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2016 HPUDS Review Working Group - Theme 3.6: Whirinaki

HERETAUNGA PLAINS URBAN DEVELOPMENT STRATEGY (HPUDS) REVIEW 2016



Implementation Working Group Report and Recommendations – Theme 1: Brookvale / Arataki submissions

Sub #	Submitter Name	Submission Theme
8	Brookvale Road Residents Association	Rezone Brookvale Immediately
12	Daly, Brian	
14	Donovan, Jill & Jeff	
29	Mair, Peter	
32	McNamara, Steve	
33	Millward, Roger	
35	Murphy, Mike & Heather	
44	Taylor, Scott	
50	Watkins, Mark	
51	Wezel, Carl & Carl	
25	Heavey, Pat	Rezone Immediately with Romanes
6	Bourke, Michael & Bourke Family	Romanes Drive - Greenfield or Reserve
43	Stevenson Family	Supports Romanes Drive as reserve area
52	Whittaker, Michael	Brookvale opposes re reverse sensitivity
54	Horticulture NZ	Concern with Brookvale /Romanes
6	Hastings District Council	Arataki Extension - keep in strategy

Submission Theme 1.1: Brookvale Road Greenfields Growth Area and Romanes Reserve Area

Submissions Addressed:

A number of Brookvale Road landowners (Submissions: 8 (**Brookvale Road Residents' Assn**), 12 (**Brian Daly**), 14 (**J & J Donovan**), 29 (**P Mair**), 32 (**S McNamara**), 33 (**R Milward**), 35 (**M & H Murphy**), 44 (**S Taylor**), 51 (**C & C Wezel**)) supported the identification of the land on the north side of Brookvale Road as a residential greenfields growth area and urged the Hastings District Council to rezone the land immediately. The basis of the submissions was that past and projected demand in Havelock North has been underestimated and the land meets many of the HPUDS tests, particularly proximity to schooling and reserves and the landowners are willing to develop. In related submissions, three submitters (**Stevenson** (43), **Bourke** (6) **Heavey** (25)) supported in part the inclusion of Romanes Drive as a reserve area or an enlargement of the Brookvale Road area.

Michael Whittaker (52) of Te Mata Mushrooms ('TMM') however opposed the inclusion of Brookvale Road due to reverse sensitivity issues and **Horticulture NZ Limited** (54) noted concern with both the Brookvale and Romanes areas as having production values which will be lost if development occurs.

Consideration and Recommendations

It is accepted that Brookvale meets many of the tests for greenfields growth areas outlined in HPUDS, particularly in relation to proximity to intermediate and secondary education. Given that the Hastings District Council is not now in a position to deliver infrastructure and zoning to the Arataki Extension this year as planned, Brookvale can be regarded as a natural substitute for Arataki and this was signalled in HPUDS 2010.

The Working Group considered whether some of the area should be excluded because the residential amenity expected may not be able to be achieved over the full area under current circumstances due to the odour issues with the nearby Mushroom farm, and whether those expectations would create a reverse sensitivity effect which will adversely affect the mushroom farm's operations.

We note however, that all greenfields areas identified in HPUDS have indicative boundaries that are subject to further testing and refinement through the structure planning process and thereafter statutory processes. HPUDS is not expected to get down to that level of detail, but to identify preferred nodes of development. This is the case with Brookvale as well, so we do not consider it necessary to define specific boundaries in relation to the reverse sensitivity issues through the current process. On the basis of the information before the Working Group, we concluded that there is a very real prospect that some or all of the identified Brookvale growth area will be able to be developed. It is also considered that the areas within closest proximity to TMM may be able to be developed in time with further information, monitoring and technological improvements.

Horticulture New Zealand drew our attention to the fact that is that Brookvale is larger than the Arataki Extension that it is to replace and has some productive values (as identified in HPUDS 2010). On this point it is noted that the theoretical yield of 320 sites is unlikely to be achieved in practice due to the need for a reverse sensitivity buffer, the amount of land likely to be taken out of the development supply by existing dwellings and outbuildings and the uncertainty over the exact extent and timing of the land east of Davidson Road.

In any event, the 100 extra households are a consequence of logical boundaries, rather than trying to manufacture artificial boundaries to stick rigidly to aspirational based targets. In that respect we note that in any event an extra 100 households over the allocated target of 4415 over 30 years is hardly significant.

HPUDS 2016 does not describe Brookvale differently to HPUDS 2010 to reflect the new circumstances relating to Arataki and Brookvale's inclusion in HPUDS 2016. Accordingly HPUDS 2016 should include a new section that carries forward section 8.8 from HPUDS 2010 with appropriate modifications to reflect Brookvale's inclusion. Suggested wording is recommended in the section below.

On the basis that Brookvale Road is to be included, other submissions sought an enlargement of and change in status of the Romanes Drive block from "reserve" area to a full growth node. Being on the north side of Havelock North this area would be reasonably attractive to the market, has reasonable scale attractive for developers and has good transport links to the north and good vehicle and cycle links to Hastings and Havelock North. The likely replacement of Arataki Extension with the Brookvale area (referred to above) would mean that Romanes would become a logical extension to Havelock North if needed.

If developed in isolation from Brookvale, Romanes' physical separation from the remainder of the urban area would make the establishment of a defined urban edge more difficult. Integrating the site with existing development would likely require the development of the adjacent Brookvale site and Napier Road would become a natural urban edge, but a further

buffer area would need to be developed to the north of the development area. In our view an extension of Russell Robertson Road through to Thompson Road could help define a north eastern extent of urban development and better distribute traffic from the wider area and for the Brookvale/Romanes growth area. This would need to be specifically considered as part of the structure planning for this area.

Including an enlarged Romanes Drive as a full greenfields area in addition to Brookvale Road would add a further 275-350 greenfields houses, which would help meet concerns about whether supply is sufficiently matched to demand preferences for Havelock North and for retirement village development there in particular. We accept that this increase in supply in conjunction with other recommendations of this Working Party will need to result consequential adjustments to the HPUDS targets to reflect a greater supply of greenfields land beyond any required contingencies and result in less intensification uptakes. The Working Group considers that this may better reflect the current markets slowness to transition to supplying alternative housing options at the beginning of the thirty year period. Overall we consider this site would be appropriate for inclusion in HPUDS provided the Brookvale area had been developed and so we have recommend changes and consequential amendments to the Targets in a separate section of this report.

Finally, in relation to timing issues raised in submissions, the Working Group notes that HPUDS is a thirty year strategy that leaves sequencing decisions to the individual territorial authorities to decide, as a matter of policy and programming through their LTPs and district plans, given the considerable infrastructure spends involved. A number of other factors are listed in HPUDS that may be taken into account, but at this stage the Hastings District Council has not made any determination of priority and timing for Brookvale. The fact that demand exceeds supply in Havelock North at present is more a factor of problems on the supply side with the issues that developed with the Arataki Extension, rather than any under-prediction in HPUDS 2010 and the projections used in HPUDS 2016 seem to be appropriate at this point in time although this situation should continue to be monitored regularly.

HPUDS Implementation Working Group's Recommended Amendments:

Replace the Brookvale/Davidson paragraphs in Section 8.8 of HPUDSS2016 as follows:

Brookvale/Davidson Road

This area of land is located on the western side of Brookvale Road opposite the existing Arataki subdivision. The availability of services to the site would not be an issue for growth considerations. There may be issues with compatibility with adjacent land uses and this growth would not form a natural urban edge to further development, although a partial low river terrace could be reinforced by a wide planted greenbelt and buffer in public ownership.

This site is located on land currently zoned Plains and although the soils are identified as having some limitations a large portion has been and is in productive uses. Development of this area under the strategy assumptions and principles could undermine public confidence in terms of promoting the protection of versatile soils land for productive purposes, intensification and compact urban footprint and is not, **but is** considered necessary within the planning period, **due to reverse sensitivity issues impacting on Arataki Extension in the short to medium term at least. A consideration for this site is the need to buffer against productive use on land to the north. Also a consideration is the need to address the potential for reverse sensitivity from the significant Te Mata Mushrooms facility to the south east.**

Add a new paragraph in section 8.8 of HPUDS 2016 as follows:

Romanes Drive Reserve Area

This site is located on land currently zoned Plains and although the soils are identified as having some limitations a large portion of the area back to Thompson and Davidson Road has been, and is, in productive use. Being on the north side of Havelock North this area would be reasonably attractive to the market and has reasonable scale attractive for developers. It has good transport links to the north and good vehicle and cycle links to Hastings and Havelock North. The likely replacement of Arataki Extension with the Brookvale area (referred to above) would mean that Romanes would become a logical extension to Havelock North if needed. Including an enlarged Romanes Drive as a full greenfields area in addition to Brookvale Road would help meet concerns about whether supply is sufficiently matched to demand preferences for Havelock North and for retirement village development in particular.

Overall this site would be appropriate for inclusion in HPUDS, provided the Brookvale area had been developed. If developed in isolation from Brookvale the physical separation from the remainder of the urban area would make the establishment of a defined urban edge more difficult. In this case Napier Road would become a natural urban edge, but a further buffer area would need to be developed to the north of the development area. An extension of Russell Robertson Road through to Thompson Road could help define a northern extent of urban development and better distribute traffic from the wider area and for the Brookvale/Romanes growth area. This would need to be specifically considered as part of the structure planning for this area.

Submission Theme 1.2: Arataki Extension Growth Area.

Summary of Submission:

Hastings District Council (submission 54) sought the reinsertion of the 'Arataki Extension' location as a "Greenfield Growth Area" noting that its availability for residential development has been 'put on hold' in the short to medium term due to the reverse sensitivity issue with nearby Te Mata Mushroom's operations.

Consideration and Recommendations

The 'Arataki Extension' was identified in HPUDS2010 as an appropriate residential greenfield growth area, but subsequent assessments have led to HPUDS2016 no longer retaining that classification due to proximity of the Te Mata Mushroom operation. There is no clear and obvious remedy to the odour issues associated with the mushroom farm, so the Arataki Extension location is appropriately placed 'on hold.' If Arataki Extension AND Brookvale were retained as is suggested by HDC (at least in the short-term), that would skew total residential development numbers informing the Strategy's preferred settlement pattern.

Given the relative short-term uncertainty of a solution to the odour issues presenting at the Arataki Extension option, it is considered appropriate to reclassify Arataki Extension as a 'Reserve Area' in HPUDS2016, but with a clear statement intending to review that classification as part of future regular five-yearly Reviews of HPUDS. If the odour issues are resolved then it is very likely that Arataki Extension will fall back in favour as one, if not the most, appropriate locations in the Havelock North vicinity for future residential greenfield development in the next thirty years. That reintroduction may see at least one of the other

greenfield growth areas in the Hastings / Havelock North urban area being deferred beyond HPUDS' 30 year planning period, unless growth projections have increased beyond current expectations.

HPUDS Implementation Working Group's Recommendations:

1. Reclassify 'Arataki Extension' as a "Reserve Area" for residential greenfield development; AND
2. Amend HPUDS2016 Section 4.3.3 to read: "...In responding to immediate greenfields supply availability issues to 2025, the 2016 HPUDS Review confirms the replacement of Arataki Extension with Brookvale, and inclusion of the following 'reserve' growth areas:
 - a. Arataki Extension (with the intention that this area may be reintroduced (e.g. as part of regular HPUDS Review process in future or similar) as a greenfield growth area ahead of other growth areas, should the odour and reverse sensitivity issues due to proximity of the mushroom farming operations, be overcome)
 - b. ..."
3. Plus any other consequential amendments necessary to implement the amendments in 1 and 2 above.
4. Accept in part those specific amendments, as consequentially amended to give effect to recommendations 1 and 2 above, set out on pages 280-282 of the submission bundle (HDC submission pages 4-6) relating to addition of hectare figures for each of the growth and reserve areas.

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Implementation Working Group Recommendations – Theme 2: Hastings District Identified Greenfield Growth & Reserve Areas

Submissions Addressed in this Document		
Sub #	Submitter Name	Submission Theme
4	Beamish, Josi	Iona Havelock Hills - opposes
41	Rutter, Peter	
18	Graeme Lowe Properties Limited & Lowe Family	Iona Havelock Hills supports amend maps & yield
34	Mohi, Rose	General - Halt all Hastings growth for lower Havelock Hills
42	Smith, Maurice	Te Aute Rd / Middle Rd - rezone Te Aute Rd now
18	Graeme Lowe Properties Limited & Lowe Family	Support Middle Rd as a Reserve Area
41	Rutter, Peter	Supports Middle Rd area over Iona & Hills
10	Cooper, Karen	Howard St to Awahou Stream supports this area as greenfield area in HPUDS.
24	Hawke's Bay Racing	Wall Rd Reserve Area - supports
47	Troup, Jason	Wall Rd Reserve Area - supports & wants fringe areas if can be serviced
27	Magee, Alan	Murdoch Road Reserve Area – opposed
5	Bishop, Jim	Tomoana Industrial - add whole block
46	Token Holdings	
9	Clifton Bay Limited	Te Awanga South– requests mapping of property as Greenfields Area in HPUDS.
28	Mahoney, Mark	
48	Unison Networks Limited	General – cost of power supply - Te Awanga / Haumoana and Waimarama

Submission Theme 2.1: Iona and Havelock Hills Growth Node

Submissions Addressed:

Josi Beamish (submission 4) and **Peter Rutter** (submission 41) sought that the Iona Hills area be removed from the Greenfields growth area. Peter Rutter instead supported development between Middle Road and Te Aute Road, south of Upham Street, as residential area, while **Rose Mohi** (submission 34) also supported further growth in Havelock North through creation of a new suburb in poorer soil areas or on low hills, but not on Te Mata Peak.

Graeme Lowe Properties Ltd & Lowe Family (submission 18) on the other hand supported the continued inclusion of their Iona Road land (both 'triangle' (Middle Road/Iona Road) and 'hill' (Havelock North Hills) areas) as greenfield growth areas with amendments to the maps and yields.

Considerations and Recommendations:

The Working Group was advised that the Iona Triangle is already zoned for residential development in the Proposed Hastings District Plan (decisions version, September 2015), and is currently in two zones:

- i) 9.2ha zoned 'Character Residential' (this land has been zoned for residential development for more than 20 years, but has never been progressed as the landowner had no desire to develop the land for this purpose, and it remains a vacant lifestyle site); and
- ii) a further 7.5ha zoned 'Deferred Residential'.

The Iona Hill site is a series of valley areas and ridgelines which are orientated towards Iona Road and form part of the lower Havelock Hills (Kohinuraukau Range), and is zoned 'Rural Residential' in the Proposed District Plan. This site is also the subject of an appeal to the Proposed District Plan by the landowners seeking a residential zone through the application of a structure plan that allows for a greater level of residential development on this site than the current rural residential zoning allows.

In identifying these areas for future urban growth, HPUDS 2010 stated that this area:

"has a number of locational advantages being close to existing development for services, not impacting on versatile soils for productive purposes, not conflicting with adjacent land uses, not impacting on landscape qualities and not impacting on transport infrastructure. It may be marginally more expensive to develop due to the rolling nature of the topography. It is recommended as a greenfield expansion area for the period 2015-2045".

The Triangle and Hill sites are listed as residential growth areas for Havelock North in the Proposed District Plan (refer Appendix 2 Figure 2 of the Proposed District Plan), with the Hill site identified for future 'large lot' residential, meaning that this land is anticipated to be needed to accommodate growth within the 10-year life of the District Plan.

To this end, The Working Group was advised that in July 2016 Hastings District Council had released an Issues and Options Paper for the Proposed Iona Residential Growth Area, seeking landowner, mana whenua and wider community feedback on which of 3 options is preferred for development of the wider Iona Road greenfield growth area.

On that basis, it is considered that the Issues and Options analysis, and subsequent structure planning and plan change processes are the more appropriate forum in which to address the extent of area and the sequencing of development in the wider Iona Road greenfield growth area. To delete or substantially alter the extent of the 'Middle/Iona' and 'Havelock Hills Lower Extension' greenfield growth areas in HPUDS, when the area was identified in HPUDS 2010 and incorporated into the Regional Policy Statement would undermine both those public planning processes and would pre-empt the outcome of the public process that Hastings District Council has already commenced on its detailed planning.

There does however, appear to be a mapping error between HPUDS 2010, the Draft Revised HPUDS 2016 document and the website version of the map applying to the Iona/Havelock Hills greenfield growth areas. On that basis, it would be appropriate to correct this error.

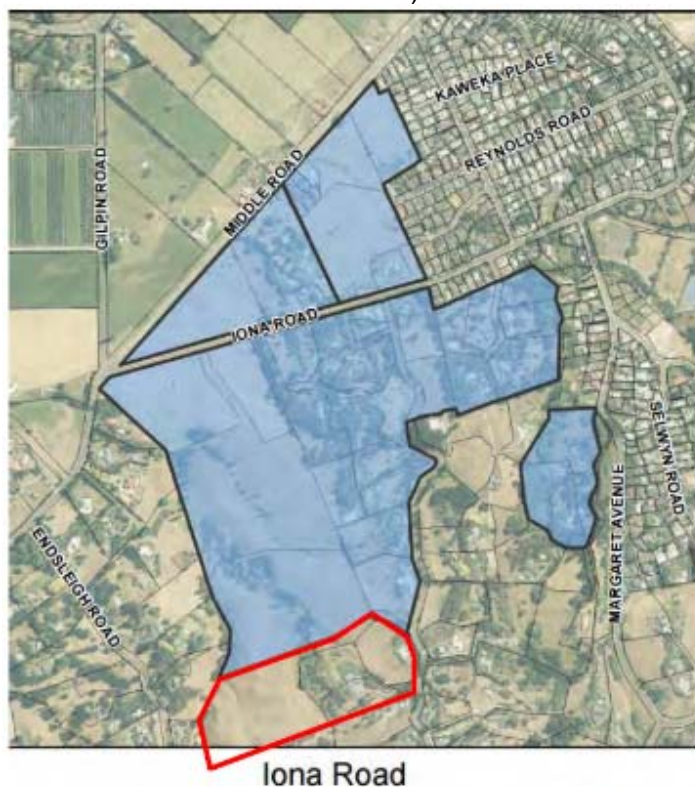
It is also important to note that the 'indicative yields' in HPUDS are not hard and fast, and their role is merely to assist in a high level analysis of long term urban development capacity and to inform broad sequencing decisions of the relevant territorial authorities. In other words, discrepancy is to be anticipated and even expected.

A preferred option for the Iona Residential Growth Area has yet to be determined, and consequently detailed structure planning and a formal District Plan Change process have yet to commence (anticipated by Hastings District Council to be 2017). Ultimate determination as to likely yield will be appropriately addressed at the Structure Plan and District Plan Change/Variation stage. In the meantime, the indicative yields expressed in the Draft Revised HPUDS 2016 document are 'fit for purpose', and not seen as being definitive or constraining.

On that basis, it is considered unnecessary (and premature) to make changes to the indicative yields for 'Middle/Iona' and 'Havelock North Hills' Greenfield Growth Areas.

Implementation Working Group's Recommendations:

1. That minor amendment is made to the 'Iona Road' residential growth area map (website version) to make it consistent with the area incorporated in the original HPUDS 2010 (Map 28 – Havelock Hills Lower Extension) and the Draft Revised HPUDS Strategy 2016 document (Map 27 – Havelock Hills Lower Extension), as follows (additional land to be included is outlined in red):



Note: base aerial photo will also need extending.

2. That no other amendments be made as a result of these submissions.
3. The IWG also noted several concerns expressed about traffic generation.

Submission Theme 2.2 Middle Road Reserve Growth Node

Submissions Addressed

Graeme Lowe Properties Ltd & Lowe Family (submission 18) and **Peter Rutter** (submission 41) supported inclusion of the Middle Road reserve area, while **Maurice Smith** (submission 42) sought: the immediate release of Te Aute Road/Karamu Stream portion from its 'reserve status' as a greenfield development area for the retirement sector.

Consideration and Recommendations:

The Middle Road/Te Aute Road area has been considered in previous urban development strategies for Hastings and HPUDS 2010, but excluded for various reasons. While the general conclusions from the Stage 1 data and assessments carried out during the HPUDS 2016 review found that the core principles and long term projections of HPUDS 2010 remained sound, it concluded that there was a need for identification of reserve areas should areas identified in HPUDS prove unviable through the detailed investigation and structure planning process as occurred with Arataki Extension.

Substituting the Middle Road reserve area for the Iona Triangle and Hills is not considered necessary by the Working Group. The Iona Triangle and lower Havelock Hills have been identified for residential development for some 20 years. Hastings District Council has embarked on a comprehensive assessment of options for development of the Iona Road area, with a view to initiating structure planning for this area in 2017. It would be pre-emptive of this process to substitute this area with that of the 'Middle Road' reserve area at this point in time.

Given that the Hastings District Council is not now in a position to deliver infrastructure and zoning to the Arataki Extension this year as planned, it has resolved to advance the Iona Road Triangle area, on the basis that this was the next priority area established in HDC's 2011 Priorities and Sequencing Policy.

The Iona Road areas are already variously zoned for residential/rural residential development in the Proposed Hastings District Plan, indicating they are anticipated for development within the 10-year life of the District Plan.

As Hastings District Council is part way through considering issues and options for the Iona Road area, with a view to initiating structure planning for this area in 2017, planning for development of the Iona Road area is some considerable way further along than is the case for Middle Road.

As a retirement village, the 162 Te Aute Road block would not be a quick fix to the pinch point in residential supply. It would potentially be slower to bring to the market than the Iona Road areas, and likely no quicker than Brookvale. At this stage, there appears sufficient large vacant greenfield land of 6+ hectares within the various Greenfield Growth Areas being progressed (including the Brookvale, Romanes and Iona Road areas in Havelock North) to cater for perceived retirement sector demand, and there is no deficit in supply sufficient to promote Te Aute Road ahead of these Greenfield Growth Areas (or the remainder of the Middle Road 'reserve area' for that matter) for this purpose.

As already noted, if any issues arise that make either of the Iona Road areas unviable, or if any issues arise that become insurmountable, the Hastings District Council is in a position to progress Middle Road (or part thereof, if considered appropriate) as a substitute, without referral back through a future HPUDS review process.

HPUDS 2016 does not describe Middle Road differently to HPUDS 2010 to reflect the new circumstances relating to its inclusion in HPUDS 2016 as a Reserve Area. Accordingly HPUDS 2016 should include a new section that carries forward section 8.8 from HPUDS 2010 with appropriate modifications to reflect Brookvale's inclusion. Suggested wording is recommended in the section below:

HPUDS Implementation Working Group's Recommendation:

Amend paragraphs relating to Te Aute Road/Middle Road in Section 8.8 of HPUDS 2016 as inserted from HPUDS 2010 as follows:

Te Aute Road/Middle Road

There were two areas of land considered in this area. The first is a 5.5ha strip of land between Te Aute Road and the Karamu Stream and the second a block between Te Aute Road and Middle Road which is approximately 55 ha in area. The smaller area of land was previously considered as a plan change request and rejected on the basis of it being a finger of residential development into the Plains Zone and consequently should not be considered alone as it would not be an efficient use of the land and would not create a defined urban boundary in the south-eastern sector of Havelock North.

The soils in this area are in three bands running parallel with the Karamu Stream. Closest to the stream they are classified as Hastings clay loam on silt loam with imperfect drainage, then Te Awa clay loam on Taupo pumice sand with imperfect drainage and then Poporangi ashy sandy loam on sandy (loes) on pan over gravel with poor drainage. The area has traditionally been cropped and there are a few smaller producing orchards and grazed lifestyle lots. There are a number of producing orchards to the south west on similar Hastings and Te Awa soils.

*The land was considered unsuited for greenfield development for a number of reasons. Firstly it is Plains zoned land that has been used productively and it would set a new direction for the development to the south of Havelock North. It is also such a large area of land it would provide for greenfield land well in excess of what is needed for the area in the time period and could reduce the incentive to intensify within the Havelock North area which under the strategy assumptions, is not necessary at the present time. Finally, the **Brookvale/Romanes/Arataki** area is a better alternative providing a smaller area of land and creating a defined urban edge. **If however there are problems with developing northwards in Havelock North, such a new direction may be justified. A smaller area has therefore been identified as a reserve site in HPUDS 2016, which largely aligns with the existing urban boundary at this time and would extend across Te Aute Road to the Karamu stream. A strong artificial urban buffer would be needed to signal the limit to further urban sprawl to the south. The area between Te Aute Road and the Karamu stream will be around half of the finger of development referred to above, and would make an attractive location for a retirement village development.***

Submission Theme 2.3 Howard Street Growth Node Extension

Submissions Addressed

Karen Cooper (submission 10) supported the inclusion of Howard Street to Awahou Drain as a residential growth area.

Consideration and Recommendations:

The principal reasons for the inclusion of this area as part of the Howard Street Greenfield Growth Area is because it is contiguous with existing residential; it is held in 6 small titles which limit productive capacity; and it has good vehicle transport links.

This submission is in support of the inclusion of Howard Street to Awahou Drain as a greenfields growth area in HPUDS and does not request any changes.

HPUDS 2016 does not describe Howard Street differently to HPUDS 2010 to reflect the new circumstances relating to its extension to the Awahou Stream HPUDS 2016. Accordingly HPUDS 2016 should include a new section that carries forward section 8.8 from HPUDS 2010 with appropriate modifications to reflect the inclusion of the Howard Street Extension. Suggested wording is recommended in the section below.

HPUDS Implementation Working Group's Recommendation:

Amend paragraphs relating to Howard Street in Section 8.8 of HPUDSS2016 as inserted from HPUDS 2010 as follows:

Howard Street

*The site in Howard Street is a 14ha area of land which is immediately adjacent to the Parkvale School and surrounded by existing urban development on three sides. There is therefore an incompatibility between rural use of the land and the adjoining school. The soils are silt/clay loam with imperfect drainage and held in small titles with dwellings and therefore mainly in rural lifestyle use. It is appropriate to mitigate the incompatibility of those land uses and use the opportunity to square up the urban boundary and ~~create a clearly defined urban edge by means of a reserve held in the ownership of Council.~~ There is a ~~potential~~ natural boundary further to the east in the form of the Awahou Stream, but a less distinct boundary to the north if development were to encroach that far, **which will need to be managed.** ~~Development as far as the stream under the strategy assumptions and principles could undermine public confidence in terms of promoting the protection of versatile soils for productive purposes, intensification and compact urban footprint, and is not considered necessary within the planning period.~~ **The area will be attractive to the market and is well placed in terms of the roading network and services***

Submission theme 2.4 Wall Road Reserve Growth Node

Submissions Addressed

Hawke's Bay Racing (submission 24) and **Jason Troup** (submission 47) supported the inclusion of the Wall Road Area as a reserve greenfields growth area. Jason Troup however, also sought the ability for any owner of land under a certain size be able to subdivide and develop if services are available, due to farming viability issues.

Consideration and Recommendations:

The submitters' support for the Wall Road Reserve Greenfield Growth Area is acknowledged. An open ended right to develop on smaller blocks as suggested by Mr Troup however, would not be in accord with HPUDS. Notwithstanding that a property may not be viable as a business, many still have productive potential and can be eventually amalgamated with other larger units and/or used productively as a lifestyle choice thereby contributing to the local economy. Residential development would prevent such productive contributions from occurring within the foreseeable future.

In any event the existing lifestyle lots still provide diversity in the market and removing those that exist creates pressure for further lifestyle subdivision of rural land elsewhere. In addition such ad hoc development can undermine the ability to achieve planned and integrated development and compact urban form.

Accordingly no amendments to the strategy are recommended.

HPUDS 2016 does not describe Wall Road differently to HPUDS 2010 to reflect the new circumstances relating to its inclusion in HPUDS 2016 as a Reserve Area. Accordingly HPUDS 2016 should include a new section that carries forward section 8.8 from HPUDS 2010 with appropriate modifications to reflect the inclusion of the Wall Road Reserve Area. Suggested wording is recommended in the section below.

HPUDS Implementation Working Group's Recommendations:

Amend paragraphs relating to Wall Road in Section 8.8 of HPUDSS2016 as inserted from HPUDS 2010 as follows:

*"This is an area of approximately 40 ha lying between Wall Road and the Upper Southland Drain. This area therefore has a strong long term physical boundary with some urbanization and lifestyle lot development at the Southland Road end. The soils are silt/clay loam with imperfect drainage like the Murdoch Road West site and the majority of the site is in cropping and some orchard use. It has not therefore been included under the current growth assumptions as other sites are available which are more compromised for production and it is not considered as being necessary within the planning period. **A smaller area of land at the eastern end has had its productive values compromised by other uses. This area may be suitable for development if there is a pressing need, provided a strong boundary is artificially created to separate it from the balance of the productive area. It has been identified a reserve area in HPUDS 2016 on this basis.**"*

Submission theme 2.5: Murdoch Road Reserve Growth Node

Submissions Addressed:

Alan Magee (submission 27) was concerned that the identification of his land, which is one of two parcels identified, as a reserve greenfields growth area would result in a sizeable increase in property values and therefore rates.

Consideration and Recommendations:

Notwithstanding the productive potential of the land, the Murdoch Road West area has many desirable features from an urban development perspective. The Working Group considers that it is prudent to identify the land as a possible reserve area as a backstop to the Hastings greenfield growth areas not proceeding in time, for whatever reason, to ensure reasonable continuity of supply of residential land in Hastings. The Working Group notes however, that this does not foreshadow any certainty that the land will be zoned for development at any time within the next 30 years of the strategy.

The concerns the Magee's have regarding property values and rates are understood. Any rate increase (over the norm) is however going to be based on an improvement in land value (given the actual rating calculation is based on current rather than future use), which can ultimately be realised by the Magee's to offset those costs. Given that the area will only have 'reserve' status, this potential value uplift may be quite low.

In any event it would not make sense to leave out the Magee land (in pastoral use) and leave in the balance (in orchard use). The orchard land will necessarily need access through the pastoral block and the Magee property would be an island of rural land sandwiched between residential developments. While it would be the Magee's choice to continue with the current use, it would be a nonsense from a planning perspective not to zone it with the neighbouring land to allow for conversion to residential use in the fullness of time.

HPUDS 2016 does not describe Murdoch Road differently to HPUDS 2010 to reflect the new circumstances relating to its inclusion in HPUDS 2016 as a Reserve Area. Accordingly HPUDS 2016 should include a new section that carries forward section 8.8 from HPUDS 2010 with appropriate modifications to reflect the inclusion of the Murdoch Road Reserve Area. Suggested wording is recommended in the section below.

HPUDS Implementation Working Group's Recommendations:

Amend paragraphs relating to Murdoch Road in Section 8.8 of HPUDS 2016 as inserted from HPUDS 2010 as follows

*"This small area of land of approximately 1 ha bridges a gap between existing residential developments on this section of Murdoch Road. It would create a natural boundary for any development and infrastructure would be readily available. The soils are silt/clay loam with imperfect drainage. An extension of this area to the Upper Southland Drain and Railway Road would also contribute to compact urban development and form a sensible round off with strong boundaries and encompass a further 25ha. It has not been included under the current growth assumptions as it has an existing producing orchard and grazing land and is not considered as being necessary within the planning period, **however, it has been included as a reserve greenfields growth area should it be needed due to a change in circumstances of the nature described in HPUDS.**"*

Submission Theme 2.6: Mapping of Tomoana Industrial Node

Submissions Addressed:

Jim Bishop (submission 5) and **Token Holdings** (submission 46) sought that the indicative Tomoana Industrial Node as represented in HPUDS by a grey circle, be replaced with a more defined area encompassing Pakowhai Road, Elwood, Tomoana Road and the Proposed North Eastern Connector.

Considerations and Recommendations:

Tomoana area is generally suitable as an industrial growth node. The main question here is should the boundary be more clearly defined at this point and if so where that boundary should be drawn?

Drawing a boundary, even if indicative, suggests a defined area is required to be converted from plains use to industrial use to meet demand, and secondly some appreciation at least at a high level of where and how interface and servicing issues can be addressed.

Hastings capacity identifies it as being the logical choice for wet industry at Whakatu and later Tomoana Expansion at either Tomoana or Whakatu is planned only after spare capacity is consumed at Whakatu. We note also that zone expansions for dry industry are currently underway at Irongate and Omahu Road. So even if the full 60 ha anticipated in HPUDS for Tomoana/Whakatu is allocated to an expansion at Tomoana, this is unlikely to be needed until Whakatu is full and predicted uptake will be tempered with the knowledge that expansion at Omahu and Irongate is likely to see relatively generous levels of land supply over all (54 ha over projected need). At this stage therefore it would seem difficult to determine with any degree of accuracy the forward land requirement upon which to draw justifiable urban boundaries there are interface and servicing issues that also come into play.

HPUDS also identifies that some of the expansion will conflict with recognised soil values, particularly in the Tomoana/Whakatu areas. This is an issue that will require careful consideration as much of the infrastructure that is suited to 'wet industry' is already in place in these areas. As such, any rezoning of this land for urban use is likely to be strongly opposed by rural land protection interests.

It should be noted that all greenfields areas identified in HPUDS have indicative boundaries and that they are subject to further testing and refinement through the structure planning process and thereafter statutory processes. Against this background, the following key points emerge:

- Uncertainty over the area required given surplus industrial land already identified/zoned beyond the projections
- Highly versatile land conversion of which to industrial use will be of interest to other parties seeking to protect such land
- Earlier preliminary Structure Plan indication of different boundary lines to those proposed for landscape/amenity and flooding reasons.
- Servicing issues have not been fully developed that may impact on land requirements.

It is therefore concluded that overall it would not be prudent to raise expectations by determining a more precise boundary at this time.

HPUDS Implementation Working Group's Recommendation:

That no amendments be made as a result of these submissions. Overall, it would not be prudent to determine any precise boundaries at this time in HPUDS.

Submission Theme 2.7: Te Awanga and Haumoana Mapping Issues

Submissions Addressed

Clifton Bay Limited (submission 9) and **Mark Mahoney** (submission 28) sought that the Strategy incorporates accurate planning maps that correlate to recent district planning from the Proposed Hastings District Plan decisions at Te Awanga and Haumoana, namely the coastal residential deferred zoning.

Consideration and Recommendations:

From HPUDS perspective, there is no dispute that the Te Awanga and Haumoana areas are generally suitable for limited coastal residential growth. However, the Working Group notes that all greenfields areas identified in HPUDS have indicative boundaries and are subject to further testing and refinement through the structure planning process and thereafter statutory plan change processes.

Recent rezoning of certain blocks of land in these areas from 'Plains' to 'Deferred Residential' through the recent Proposed Hastings District Plan process confirms that there has been some further testing and refinement of where future growth is expected to go within the 10-year life of the District Plan. The Hastings District Council however, anticipates completion of a master planning exercise before contemplating a detailed structure planning process for this area. Drawing a boundary, even if indicative, suggests a predictable area is required, and that the decisions about where all the future growth in each of the two settlements is to occur between 2015 and 2045, have been made.

We also observe that the Partner Councils are also collaborating on a joint 'Clifton – Tangoio Coastal Hazards Strategy'. The development of this Coastal Strategy is only part way through. It is likely that any master planning for Haumoana and Te Awanga will not be commenced until that wider Coastal Strategy has been completed. In essence, it is still not clear where these strategic processes will lead, and they may impact significantly on the exact location of future residential growth, and the resulting density (and ultimately the yield) that can be achieved in Haumoana and Te Awanga, beyond just the deferred zones. Precise boundaries would remove flexibility in determining where residential growth should occur in Haumoana and Te Awanga, when there is still a level of uncertainty around where that growth can and should occur.

In addition, whilst these areas have been rezoned in the Proposed District Plan for future residential growth, they are all still subject to appeals that are yet to be resolved. The Working Group agrees that given the level of uncertainty and outstanding district plan appeals applying to the Deferred Residential zoned areas in Haumoana and Te Awanga, as well as outstanding appeals on the Residential/Lifestyle Overlay zoning of the land at 380 Clifton Road, it seems prudent to leave the broad HPUDS indicative nodes as they are at the present time.

More precise boundaries could be a matter for further consideration during the next HPUDS review cycle, assuming outstanding district plan appeal matters etc. have been settled or sufficiently progressed in that time.

HPUDS Implementation Working Group's Recommendations:

That no amendments be made as a result of these submissions.

Submission Theme 2.8: Need for Electricity Upgrades

Submissions Addressed

Unison Networks Ltd (submission 246) encourages councils and developers to engage with them as early as possible to determine the exact cost implications of network upgrades associated with planned development.

Consideration and Recommendation

The Working Group notes that electricity network costs may be incurred due to the need to strengthen the network to deliver a greater capacity of service. These costs will also be dependent on location. We note that broad infrastructure assessments do need to be undertaken at the strategy level, but structure planning and financial feasibility modelling exercise prior to rezoning and resource consents is where the details on upgrading and costs can be evaluated.

HPUDS Implementation Working Group's Recommendation:

No amendments are recommended as result of this submission.

HERETAUNGA PLAINS URBAN DEVELOPMENT STRATEGY (HPUDS) REVIEW 2016



Implementation Working Group Recommendations - Theme 3: Hastings District New Areas Requested for Inclusion in HPUDS

Sub #	Submitter Name	Submission Theme
7	Boyes, Whiting & Stone	Include Ada - Howard - Awahou Drain in HPUDS as greenfields growth area / reserve area.
3	Bayley, Kevin	Include new Hastings Greenfield – Pakowhai Rd
19	Gregory Group	Include Pakowhai Rd / Lyndhurst Rd adjacent Gracelands
13	Davidson, Charlie & Susan	Include 126 Main Rd, Clive
2	Batt, Mervyn & Robyn	Include Clive South (off Read Cres) as reserve
16	Endsleigh Cottages	Identify upper terrace fronting Raymond Road, Haumoana for Rural Residential development
39	Raymond Road Rezoning Group (Development Nous)	
40	Raymond Road Rezoning Group (Mr Maurenbrecher)	
20	Gunn, Gerard	Waiohiki - provide for lifestyle dev near Marae or allow for wider development of Marae communities
17	Evans Family Trust	Whirinaki – identify land off North Shore Rd at southern end of Whirinaki for growth in HPUDS

Submission Theme 3.1: Ada Street

Submissions Addressed:

J Boyes, K & D Whiting and K Stone (submission 7), requested the inclusion of the land bounded by Howard Street and Ada Street to the Awahou Drain as a residential growth area or alternatively as a reserve area.

Consideration and Recommendations:

We were advised that current projections indicate that no additional supply is required and too much greenfield supply would affect the ability to meet the intensification targets. This is on the basis that the long term indicative yield (of the greenfield growth areas identified in the strategy) over and above projected demand is 615 dwellings or 16%, but where the proposed reserve areas are included these figures increase to 2,365 dwellings and 54%.

On this basis HPUDS identifies sufficient greenfield land over and above projected long term demand. As such, we find that the inclusion of the identified land in HPUDS as a residential growth area would be contrary to the principles of HPUDS itself and an additional reserve area is currently not required.

We were also reminded that the areas identified as 'reserve areas' in HPUDS were selected following a multi-criteria analysis undertaken by the Hastings District Council and were subsequently deemed the most appropriate ones with respect to the criteria in RPS Policy UD4.2 as assessed by Opus Consultants. The land identified by the submitters did not score as favourably as the reserve areas that were identified for inclusion in the HPUDS 2016. This is primarily as the site has soil of high versatility as well as for other reasons.

HPUDS Implementation Working Group's Recommendations:

No changes recommended as a result of this submission given in particular, HPUDS already proposes sufficient greenfield land over and above current projections of long-term demand.

Submission Theme 3.2: Pakowhai Road

Submissions Addressed:

Kevin Bayley (submission 3) sought a new greenfield growth area involving approximately 44ha of land and fronting Pakowhai Road, between Evenden Road and the Lyndhurst Extension Greenfields Growth Area, while the **Gregory Group** (submission 19) sought the inclusion of a smaller portion fronting Pakowhai Road as an addition to the Lyndhurst Extension Greenfields Growth Area.

Consideration and Recommendations:

Assessment of these areas indicates that they may meet some of the criteria in Policy UD4.2 'New Residential Greenfield Growth Area Criteria' of the Regional Policy Statement. There would, however, need to be an identified greenfields supply deficit to add either of these areas as a new HPUDS Greenfield Growth Area, given the versatile nature of the land. The majority of the land is identified as being Land Use Capability Class 1 with a 'silt loam' soil type and therefore of the highest versatility.

HPUDS 2016 provides for a long term indicative yield (of the greenfield growth areas identified in the strategy) over and above projected demand of 615 dwellings or 16%, but where the proposed reserve areas are included these figures increase to 2,365 dwellings and 54%. In keeping with HPUDS we do not consider it would be appropriate to identify this area for Greenfields Residential Development when there is no need for additional sites to be identified for such development.

With regards to the Gregory submission, there is no need either, (in terms of a supply shortage) for any additional land to be added to the HPUDS Lyndhurst Extension Greenfields Growth Area. While the submission identified how a defensible boundary of a green belt buffer strip could be incorporated into the rezoning of this land it does not fit logically with the Lyndhurst extension, which itself has defined an associated greenbelt buffer strip, nor does it have any readily identifiable physical features to better serve this buffer function.

Given the above, we see no basis on which to support the identification of either of these areas as HPUDS Greenfield Growth Areas.

HPUDS Implementation Working Group's Recommendations:

That no amendments are made to the strategy as a result of these submissions.

The Working Group agrees that the land being subject of submissions from Kevin Bayley and The Gregory Group respectively, should not be identified in HPUDS for either greenfields growth or as a reserve area and rather should remain part of the Plains Production Zone land resource.

Submission Theme 3.3: Clive South

Submissions Addressed:

Mervyn & Robyn Batt (submission 9) sought that their 4ha property at Clive South be removed from the list of 'Inappropriate Areas for Development' and included as a reserve greenfield growth area. **Charlie & Susan Davidson** (submission 13) also requested that their 1.1ha property at 126 Main Road, Clive along with a neighbouring property, be identified for the future residential development.

Consideration and Recommendations:

We were advised that two areas identified in the 'Inappropriate Areas for development' list have had some of the issues addressed that might have previously precluded suitable development. These are Clive South (an area off Read Crescent and bounded by SH2 and Muddy Creek) and Whirinaki. Both were identified as 'inappropriate' greenfield growth areas principally due to infrastructural servicing issues.

HPUDS 2016 Review amended the Inappropriate areas to provide:

"Clive (except for the area off the end of Read Crescent and between Main Rd (SH2) and Muddy Creek)"

Although the Clive South statement is specific to the Batt's property it is noted that Davidson's property is at a similar level to the Batt's property at its road frontage and slopes up towards the Clive River to be over a metre higher at the rear.

Given this it is recommended that a slight adjustment in wording be made so that the Davidson land is also excluded from the 'inappropriate area' classification otherwise applicable to the wider Clive area. This would ensure that the land was able to be considered on its merits if a consent application were to be pursued, rather than being ruled out from consideration by HPUDS and the statutory documents that flow from it.

In terms of the requested "reserve Area" status requested, we note that the purpose of the reserve areas is to be able to be called upon as a like substitute for the area that it is replacing. Although Clive is handily located to the main urban areas, it is a settlement in its own right, with its own character. For this reason, we consider that the area of Clive South that has development potential, may be better considered for development in its own right in the wider context of the HPUDS settlement pattern, rather than as a reserve area. The subject sites of the respective submissions are 1.1 and 4ha respectively so are relatively small in the context of the strategy.

We also note that the last study of residential growth for Clive was undertaken in 2002. Given that development of the rezoned land resulting from this study was completed prior to 2010 and in light of the challenges to the 2010 HPUDS' conclusions regarding Clive being inappropriate for further development, it may be timely for the Hastings District Council to consider the potential of Clive South in time for the next review. The consideration would need to be in the context of whether limited greenfield growth can be provided in Clive in a

manner that does not undermine the current HPUDS preferred settlement pattern and greenfields / intensification targets.

Given the above, we consider it is appropriate that Clive South is removed from the areas listed as 'inappropriate for residential greenfield growth', and the Batt property is shown as a Greenfields Growth area. We consider that the Davidson property is not of sufficient scale, and does not provide a sufficiently strong limit to development to the south urban limit, to warrant sanctioning in HPUDS as a greenfields growth area in its own right. However, its lack of scale in itself suggests that any development may be more properly considered by way of a resource consent application, by which it can be distinguished from the generality of other land surrounding the Clive Township. Suffice to say that the Working Group does not consider that development of this small site on its own in the peculiar circumstances of Clive would be an affront to the HPUDS' aims and principles, particularly as only four lots are likely to be created.

HPUDS Implementation Working Group's Recommendations:

1. **To the reference to Clive under the heading 'Areas Where Greenfield Growth is Deemed Inappropriate' is recommended:**
*Clive (except for the areas off the end of Read Crescent, ~~and between Main Rd (SH2) and Muddy Creek;~~ **and between Main Rd and the Clive River opposite the Mill Rd intersection**).*
2. **Identify the 4ha property at Clive South (i.e. the Batt property) as an indicative greenfield growth area.**
3. **Incorporate a map in HPUDS to illustrate the exception areas referred in the amendment above.**
4. **The Working Group agrees that the 1.1ha property at 126 Main Road Clive (i.e. the Davidson property) should not be identified in HPUDS as a greenfield growth area, but notes that the landholders could choose to pursue a development proposal through a resource consent application process.**

Submission Theme 3.4: Raymond Road

Submissions Addressed:

Endsleigh Cottages (Submissions 16), **Raymond Road Rezoning Group (RRRG)** b(Submission 39), and **(RRRG – Anton Maurenbrecher** (Submission 40) addressed a combined area of approximately 20ha of land with a number of different owners on the corner of Raymond Road/Parkhill Road and extending along Raymond Road. Essentially these submissions sought recognition for rural residential development.

Consideration and Recommendations:

The key HPUDS principle to consider in respect of the Raymond Road area is whether '*Productive value of its soil and water resources are recognised and provided for and used sustainably*'.

The productivity and versatility of the soil resource in this area's needs and Reverse Sensitivity on surrounding productive uses should be considered. A Horticulture assessment comments that wine grapes may tolerate the conditions, but with question

marks on economic viability of scale and it is noted that there are vineyards on the opposite side of Raymond Road which is the same soil type.

In terms of reverse sensitivity from surrounding productive uses setbacks and the use of 'no complaints' covenants could theoretically manage this, but there are 2 poultry farms within a 400m proximity to parts of the area included in the submission.

HPUDS and the review of it to date has not provided for any additional areas of rezoning for Rural Residential Zone land, nor has it recommended reserve areas of potential land for Rural Residential development. We were advised that the anticipated demand of 450 lifestyle lots over the period 2015-2025 can be adequately met and assuming existing incomplete subdivision consents are completed together with further assessed potential subdivision, there will be sufficient supply to meet the remaining demand of 400 lots over the period 2026 to 2045.

While there may be some uncertainty in the long term, depending upon how subdivision is realised over time, adding Raymond Road as a potential Rural Residential Zone, or as a reserve, would, not in our view, be consistent with HPUDS in its overall approach of achieving a more compact settlement pattern.

We do however, note the position of this part of Raymond Road is in close proximity to the Haumoana (and Te Awanga) settlement, the Haumoana school, and the Park Hill Rural Residential Zone. Logically, this Raymond Road area could be reasonably considered as part of this geographical area in terms of providing coastal housing choices. This could be an option for investigation as part of the foreshadowed Master Plan process for the Cape Coast originally suggested in HPUDS 2010 and carried through into the Proposed Hastings District Plan Review.

Based on the submissions received this area has a number of merits around its soils, topography, position in relation to the adjacent Rural Residential Zone and the settlements of Haumoana and Te Awanga, and could represent sustainable land use management if considered further as an option for low density housing in the future. The approximate 20ha of land included in the submissions could be expected to yield around fifteen 1ha plus sites once building platforms and access arrangements were worked through, some of these may incorporate some of the existing dwellings. Considering this against the full growth projections across the 30 year period, it would provide a relatively small amount of housing as a coastal choice that is clear of coastal hazards and flooding if the future Haumoana / Te Awanga Master plan process deemed such development appropriate.

An amendment to this description of Haumoana could be considered to reflect this approach as follows:

“There is also an area of approximately 20ha on the corner of Raymond Road/Parkhill Road opposite the Haumoana school on Ruataniwha f soils (also described as Waipukurau 30 soils), free of flooding and coastal hazard restraints that could be suitable for coastal growth choices. This would be subject to further assessment through the proposed Masterplan process to commence after the completion of the Clifton – Tangoio Hazards Strategy. This assessment would include matters such as:

- ***The productive versatility of this area and the Ruataniwha f soil type, and***
- ***Reverse sensitivity with nearby horticultural/viticultural and poultry farm activities.***
- ***Appropriateness in terms of contributing to the Haumoana / Te Awanga development options as part of the HPUDS preferred settlement pattern”***

Such an approach could provide a reasonable signal to the community and submitters of how this area could be incorporated into a coastal choices context if tested further. This

approach would enable the landowners at their own cost and risk, to work through the RMA process options available to them.

At this point no change is recommended to the maps but incorporation of the wording suggested above would be an appropriate response to these submissions.

HPUDS Implementation Working Group's Recommendations:

- 1. To include an additional description to the HPUDS 2010 assessment of growth option sites (Section 8.8) for Haumoana (additions appear in bold):**

8.8.1 Coastal Settlements

...

- *Haumoana*

Haumoana is a popular coastal settlement located approximately 9km east of Hastings. The settlement is low lying and parts of it have been subject to flooding coastal inundation, and coastal erosion. Infrastructure limitations and topographical considerations generally make the settlement unsuitable for further growth. There is however a small area of land located off the southern side of East Road and contiguous to the existing Coastal Residential Zone and close to the Suburban Commercial Zone off Clifton Road, that is free of flooding and coastal hazard constraints and suitable for residential growth.

There is also an area of approximately 20ha on the corner of Raymond Road/Parkhill Road opposite the Haumoana school on Ruataniwha f soils (also described as Waipukurau 30 soils), free of flooding and coastal hazard restraints that could be suitable for coastal growth choices. This would be subject to further assessment through the proposed Masterplan process to commence after the completion of the Clifton – Tangoio Hazards Strategy. This assessment would include matters such as:

- *The productive versatility of this area and the Ruataniwha f soil type, and*
 - *Reverse sensitivity with nearby horticultural/viticultural and poultry farm activities.*
 - *Appropriateness in terms of contributing to the Haumoana / Te Awanga development options as part of the HPUDS preferred settlement pattern.*
- 2. The Working Group also notes that the landholders could choose to pursue a development proposal through a resource consent application process, but the Working Group does not recommend amending HPUDS to get into details of sanctioning particular sites for development via a resource consent application process.**

Submission Theme 3.5: Waiohiki

Submissions Addressed:

Mr G Gunn (submission 20) requested that provisions be included in HPUDS to allow parcels of land which are not eligible for development under the existing Papakainga rules (because they are not Maori Land under the Te Ture Whenua Māori Act 1993), to be able to be subdivided and developed at higher densities where they are within or near existing Maori settlement areas such as Waiohiki and/or that the settlement of Waiohiki be included in HPUDS as a Rural Settlement Area.

Consideration and Recommendations:

Whilst it is acknowledged that smaller blocks of land are situated between Maori land titles, have limitations on productive use the development of these general titles for housing purposes would not be consistent with the HPUDS principles. This is because the projections indicate that no additional rural residential supply is required and too much greenfields and rural residential supply would affect the ability to meet the intensification targets of HPUDS.

We note that Bridge Pa and Omahu are identified as Marae Based Settlements, but does not preclude development of other marae and Maori owned land, providing that they can independently meet the servicing requirements and the district plan provisions. At this point in time the Proposed Hastings District Plan does not provide for development at Waiohiki outside of the papakainga provisions. Nevertheless HPUDS as currently worded does not preclude the possibility of future residential development in Marae Based Settlements such as Waiohiki.

HPUDS is a high level strategic document for guiding residential growth and cannot get down to the specifics of addressing individual properties. On this basis the existing reference to Marae Based Settlements is considered appropriate and no changes are recommended in response to this submission.

HPUDS Implementation Working Group's Recommendations:

No changes recommended as a result of submission.

Submission Theme 3.6: Whirinaki

Submissions Addressed:

The Evans Family Trust (submission 17) sought to have their land between the State Highway and North Shore Road in the Whirinaki area identified as a future residential Growth area, or at least as a Reserve Growth area in the Revised HPUDS document.

Consideration and Recommendations:

During the 2016 HPUDS review, it became apparent that at least some parts of Whirinaki identified in the 'inappropriate areas for development' list in HPUDS have had the servicing issues that might preclude development addressed since the adoption of HPUDS in 2010. The Greenfields report by Opus Consultants during Stage 2 of the Review concluded that Whirinaki could be removed from the list of 'inappropriate areas for development' but it did not consider that the area warranted inclusion as a Growth area or 'Reserve' growth area.

In terms of the last point we were advised that as part of the Proposed Hastings District Plan process, two submissions sought to rezone land at Whirinaki from Rural Zone to Coastal Settlement Zone. Both those submissions were rejected for various reasons, including being in an area identified in HPUDS (and the RPS) as being inappropriate for development.

Decisions on these District Plan submissions have subsequently been appealed, and have been resolved by Consent Order that provides for a 15 lot subdivision of the 2.8 hectare block in the Rural Zone, but not for it to be rezoned, and with no rezoning of the other 11.5 hectares.

The submitters argue that this area should be included as a growth area or reserve growth area. At this stage, the 2016 HPUDS review findings have confirmed that there is sufficient

land within the various Greenfield Growth Areas comprising the HPUDS Settlement Pattern to cater for future residential demand in the Heretaunga Plains sub-region over the life of the Strategy, and there is no evidence of a deficit in supply sufficient to warrant inclusion of a further growth area at Whirinaki.

In respect of assigning this area a 'Reserve' growth area status it should be noted that this concept has not introduced 'reserve areas' for every identified greenfield growth location in HPUDS, but focuses on providing substitute growth areas for the main urban areas of Napier City and Hastings District. On that basis, there is no evidence to suggest that this area is required as a 'reserve' growth area.

Ultimately, whilst the 2016 HPUDS Review concludes that Whirinaki warrants removal from the 'inappropriate' list, this area does not warrant all or parts of the Whirinaki settlement to be identified as an appropriate residential greenfield growth area (or reserve area) as part of the HPUDS Settlement Pattern.

On the basis of the above, we consider that neither 'Greenfield Growth Area' or 'Reserve Growth Area' status is appropriate for this area of land at Whirinaki at this time.

It should be noted however, that if future reviews identify rapid and significant change in growth demand that is unable to be catered for under the current HPUDS Settlement Pattern, the Whirinaki area is now able to be considered in the mix, along with other areas that are not otherwise listed as 'inappropriate areas for development'.

HPUDS Implementation Working Group's Recommendation:

That no amendments be made as a result of this submission.

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Implementation Working Group Recommendations: Theme 4 – Napier City New Areas Requested For Inclusion in HPUDS

Submissions Addressed in this Document		
Sub #	Submitter Name	Submission Theme
26	Joseph, William & Jocelyn	Jervoistown - allow development
37	Panckhurst, Guy	Seeks identification of property on cnr of Riverbend Rd / Bledisloe Rd for greenfields development
37	Panckhurst, Guy	Seeks that an identified area of Rural Residential Zoned land off Churchill Drive be identified for greenfields residential (urban cluster housing).
1	Absalom, Neal	Provide opportunity for Rural Residential development on Meeanee Road.

Submission Theme 4.1: Napier City New Areas - Jervoistown

Submissions addressed:

William and Jocelyn Joseph (submission 26) made submissions regarding their Jervoistown property summarised as follows:

- Long term resident of Jervoistown with a large section they would like to subdivide.
- Queries when sewerage will be provided to Jervoistown.

Considerations and recommendations

HPUDS is an Urban Development strategy document for the Heretaunga Plains spanning a 30 year time period. Individual properties of the size and scale of the submitter's property (0.4307ha) are of little relevance for HPUDS and are an issue that can, and should, most appropriately be considered and dealt with as part of the consenting regime under a District Plan.

In terms of Jervoistown it is understood that a recent plan change (#7 in 2012) was developed to address the cumulative effects of adhoc subdivision and the subsequent effects on existing properties as a result of inadequate servicing in Jervoistown. The purpose of Plan Change 7 was aimed at restricting further development in Jervoistown in order to minimize any further impact on the environment. The primary mechanism for achieving this being to prohibit subdivision in all but limited situations, unless the community of Jervoistown agreed they wanted and were willing to contribute to the costs of providing full urban services.

Two structure plans for the Jervoistown are included in the Appendices of the Napier District Plan to ensure that future development of is undertaken in an efficient and effective manner that avoids remedies or mitigates any effects on the environment. Residential subdivision and development on this land is tightly restricted until the area is fully serviced. It is understood that the submitters land on its own is not of a sufficient size to be able to subdivide under the rules adopted by the Jervoistown plan change. Full servicing will only occur if a clear majority of land owners in the Zone want and are willing to contribute towards paying for full urban services to be put in place. To date no such majority support has been demonstrated to the Napier City Council and therefore no such services have been provided or are planned for in the near future.

HPUDS Implementation Working Group's Recommendation:

No changes recommended as a result of this submission.

Submission Theme 4.2: Napier City New Areas – Riverbend/Bledisloe

Submissions addressed:

Guy Pankhurst (submission 37) made a submission including a number of requests two of which are summarised and assessed in this section (the remainder of the submitters requests are addressed in the report ‘Officers’ Comments 6’):

- *Has identified 2 properties in the Taradale Hills that could be included as an ‘urban cluster growth area’ with higher densities than the current Rural Residential zoning.*
- *Has identified a property on the corner of Riverbend and Bledisloe roads they would like included in the Loop greenfield area in HPUDS.*

Considerations and recommendations

Taradale Hills

The two properties in the Taradale Hills that the submitter has identified could be included as an ‘urban cluster growth area’ (“with higher densities”) are currently zoned Rural Residential in the Napier District Plan.

The original HPUDS and the underlying reports on which it was premised concluded in 2010 that there was a surplus of existing rural residential sites to meet projected market demand. While the Working Group has heard concerns that these conclusions may not be valid, following further analysis of potential uptake of rural residential/lifestyle development opportunities, the 2016 HPUDS Review ultimately concludes that sufficient supply of zoned land should be available to meet the demand of 850 rural lifestyle living lots over the period of the Strategy albeit with the necessity for subdivision to create new lots (particularly in areas of market preference).

The land subject to this submission seems to ideally meet the market preference criteria (particularly the location close to urban amenities) and the Working Group has been informed that a recently approved subdivision on one of the subject properties created an additional 7 lots fronting onto and/or having access off Puketapu Road, having exercised the development rights afforded under the existing Rural Residential Zone. The total potential yield of lifestyle lots from these properties under the existing rules could net 46 lots in this one location alone. Any rezoning of this land would reduce the potential stock of available Rural Residential zoned land in what ideally seems a market preferred location.

The Working Group understand that while there is nothing to say that the land could not be considered as an alternative urban growth option (with higher densities) there is no evidence to support that the land can actually be developed in the manner requested (access, servicing, land stability, landscape and cultural impacts etc, are issues that appear not to have been addressed to date). Notwithstanding this the HPUDS Review findings generally confirm that the 2010 HPUDS assumptions and directions around urban growth remain sound albeit with some amendments arising in response to evidence presented during these hearings. In essence, the outcome of the Review confirms that growth is able to be accommodated within the current (and proposed amended) HPUDS settlement pattern, and the Review has not identified any significant change in the underlying assumptions that would necessitate a radical change to the overall settlement pattern, although it should be noted that ‘reserve’ growth areas have been included in the strategy to act as replacement areas should some of the preferred growth options not be able to be developed in a timely manner.

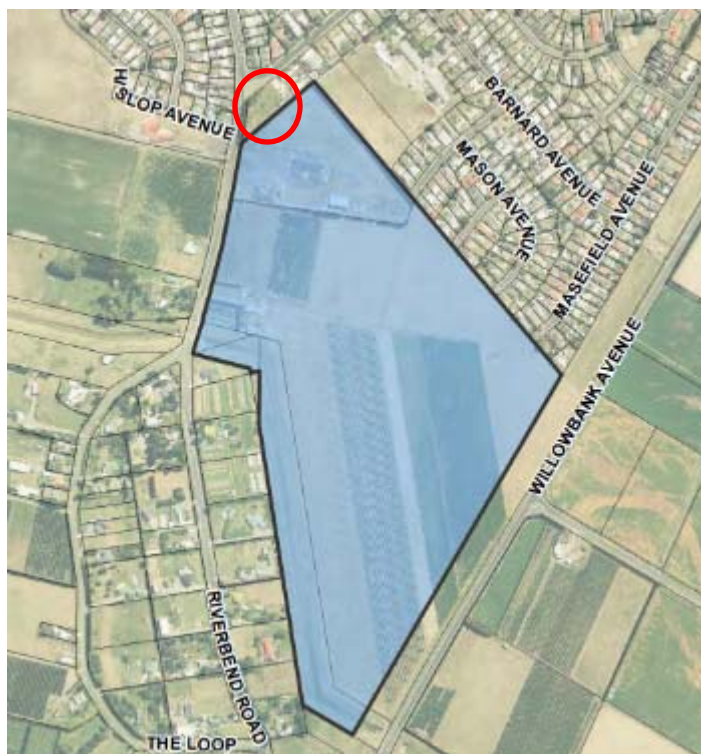
The updated projections do result in a slight population increase over the 30 year period and a more significant increase in dwelling growth (based on adopting 'medium – high' growth projections), but this increase is still able to be accommodated within the HPUDS identified greenfield growth areas and infill growth projections albeit with some minor amendments being recommended as a result of evidence presented during this hearing. Further five yearly reviews of HPUDS will provide the opportunity to retest whether the proposed supply of residential growth options remains sufficient to cater for projected growth.

Corner of Riverbend and Bledisloe Roads

HPUDS is an Urban Development strategy document for the Heretaunga Plains spanning a 30 year time period. Individual properties of the size and scale identified by the submitter (0.5620ha including at least 4 existing dwellings plus curtilage) are of little relevance for HPUDS and are an issue that can most appropriately be considered and dealt with as part of the consenting regime under the relevant District Plan. Notwithstanding this, the property that the submitter has identified on the corner of Riverbend and Bledisloe roads is an anomaly in that the Loop greenfield area will inadvertently isolate this small parcel of rural zoned land from what is ultimately intended to be residentially zoned land surrounding the property in the future. There is no logic to such a future zoning pattern and we consider the opportunity should be taken now to correct this.

HPUDS Implementation Working Group's Recommendations:

- 1. No change to the review of HPUDS in relation to the sites on the Taradale Hills.**
- 2. Include the subject property on the corner of Riverbend and Bledisloe roads (as identified on the map below) as part of The Loop Greenfield Area (Map 6 of the Revised Strategy Document).**



Submission Theme 4.2: Napier City New Areas – Meeanee Road

Submissions addressed:

Neal Absalom (submission 1) has 4 lots held in one 1.819ha title at 258 Meeanee Road. Mr Absalom's submission was as follows:

- *HPUDS strategy has insufficient regard to other forms of residential or lifestyle development or to appropriate locations for lower density development in other areas other than on the hills, even where lower quality soils are present.*
- *Meeanee Rural Residential Zone should be extended to include a ribbon development along the northern side of Meeanee Road to Tannery Road.*
- *This would not create a precedent for other areas because of the unique existing land title layout and the fact that the soils are not typical of the more versatile/fertile nature of the soils south of the Tutaekuri River. These sites can be independently serviced.*

Considerations and recommendations

The HPUDS strategy is based on a preferred pattern of compact design and recognises the community's preference to maintain the versatile land of the plains for production purposes. The direction for growth to 2045 relies on Napier City and Hastings District having defined growth areas and urban limits with the need to balance increased intensification and the provision of lifestyle choice. Defined growth areas are the key element of the settlement pattern as is the target for a development transition to 60 % intensification, 35 % greenfields, and 5 % rural.

The relevant guiding HPUDS principles are:

"Recognise versatile soils for productive purposes through minimising the need for urban development on such soils and providing for rural lifestyle development in other locations."

"Ensure there is choice in the supply and location of residential living, commercial and industrial opportunities."

With regard to the provision of lifestyle choices Napier City has a wide range of existing options. These include : Rural Residential (5,000m² minimum lot size with 1.5 ha average yield); Rural Settlement (800m² minimum for serviced sites and 1,500m² minimum for unserviced sites); Jervoistown (2,500m lot minimum); Lifestyle Character (1,000m² minimum and 3,000m² average yield), and Western Hills Residential (currently zoned for a range site sizes from 200m² to 5,000m²). Additionally single dwelling units are permitted on any existing sites within the Main Rural and Rural Conservation zones provided they are of a minimum site size of 2,500m².

While the existing Napier District Plan promotes lifestyle living options on the hills surrounding Napier City there are also existing rural settlements on the flats including Bayview, Meeanee and Jervoistown providing a range of lifestyle choices.

In terms of land intended to be used for productive rural uses, there are two areas identified as Main Rural in Napier City (4ha minimum site size for the creation of new lots). One of these is the Bayview area and the other is Meeanee. These are important rural areas for Napier and are the type of land that the HPUDS seeks to protect from further development.

With specific reference to the submitter's proposal regarding ribbon development along Meeanee Road, there are a number of smaller lots on the northern side of the road approximately 5,000m² in size. However only about four of these lots are actual standalone sites as most are amalgamated to form titles ranging from 8,000m² to 8.2ha. The Working Group have been informed that the site size averages out to approximately 1.7 ha which is close to Napier City's existing Rural Residential Zone provisions. So by default this gives another alternative lifestyle option on the fringe of the Main Rural Zone without having to change any provisions in HPUDS or compromise the potential of the land for supporting productive uses both now and into the future.

The original HPUDS and the underlying reports on which it was premised concluded in 2010 that there was a surplus of existing rural residential sites to meet projected market demand. While concern was expressed that these conclusions may not be valid, following further analysis of the potential uptake of rural residential/lifestyle development opportunities, the 2016 HPUDS Review has concluded that sufficient supply of zoned land should be available to meet the demand of 850 rural lifestyle living lots over the period of the Strategy albeit with the necessity for subdivision to create new lots (particularly in areas of market preference).

In conclusion although there are sites under 4ha along the north side of Meeanee Road, in the Main Rural Zone there is no HPUDS imperative to change this area to Rural Residential or Lifestyle development.

HPUDS Implementation Working Group's Recommendation:

No changes recommended as a result of this submission.

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Implementation Working Group Recommendations: Theme 5 – Napier City Identified Greenfield Growth & Reserve Areas

Submissions Addressed in this Document		
Sub #	Submitter Name	Submission Theme
38	Pedlow, Lyndon	Te Awa - concern with development levies - provide for development
21	Harkness, Richard	
31	Marist Holdings Limited	Western Hills - supports with amendments to map & yield Note also Matt Edwards's submission (#15) re Taradale Hills.
22	Harris, Paul	Residential Supply Issues infill contributions
15	Edwards, Matt	General concerns with growth

Submission Theme 5.1: –Te Awa

Submissions addressed:

Lyndon Pedlow (submission 38) a long term resident of the Te Awa area raised the following concerns regarding the Te Awa greenfield growth area:

- *The nature and costs associated with servicing the land for residential purposes, particularly in regard to stormwater.*
- *Would appear to want Te Awa development costs reduced/deleted or at least presumably would like alternative options for servicing Te Awa considered.*

Richard Harkness (submission 21) on behalf of Durham Properties raised a number of concerns relating to the Te Awa greenfield growth area and requested:

- *that HPUDS enables a proposed retirement village at Te Awa to be developed that is not cost prohibitive and restrictive, through consideration of alternative ways to provide servicing in a more economical way (as per what the submitter states would be consistent with a number of actions (14-18, 40, 47-49, 52, 56, 57, 58, 59-61 and 63) of the intended Implementation Plan to give effect to HPUDS). [See also Theme 6.10 for other points made by this submitter]*

Considerations and recommendations

Te Awa is one of the greenfield growth options for Napier City and has a residential zone in place along with a structure plan for coordinating the infrastructural services necessary to support residential use.

The Working Group understands concerns regarding the cost of servicing the land under the current structure plan have been widely expressed from a number of sources. As a response it has been explained that NCC have commissioned an independent preliminary review to understand the cost drivers and opportunities to reduce costs if possible. Drainage of the land is responsible for 50% of the cost and so further consideration is being given to alternatives for drainage in the first instance with a view to reducing costs.

It was identified that in order to understand drainage issues properly, and to be able to fully consider alternative options, a new model of Napier City's stormwater infrastructure was required. It is understood that when the model has been developed all potential development sites across Napier can be considered both in their own right as well as compared to alternative options to assist with future sequencing decisions, including critical infrastructure planning for Te Awa using the output of the model (assessing alternatives to those in the existing Structure Plan).

In terms of reducing/deleting development levies it is understood that the current NCC position is that the developer (as the beneficiary) pays and the costs of development are apportioned to their own specific development area rather than the whole of the city, or by a whole of catchment. Any change to this position would require The Napier City Council to decide taking into account alternative sources of funding infrastructure (such as rates) but in any case is an issue and function for NCC outside of HPUDS.

The submitter has also highlighted that a number of actions of the intended Implementation Plan to give effect to HPUDS indicate that the partner Councils' expect to continue on a work programme that seek to maximise efficiencies (and reduce costs) in the delivery of urban growth for the Heretaunga Plains sub-region. This work is intended to be ongoing (and as evidenced above currently is occurring for the Te Awa area) but ultimately there will be costs

associated with the provision of infrastructural services that have to be paid for. How the costs are apportioned is a political decision for the individual Council's to determine outside of HPUDS.

HPUDS Implementation Working Group's Recommendation:

No changes recommended as a result of this submission.

Submission Theme 5.2: –Western Hills

Submissions addressed:

Marist Holdings (Greenmeadows) Limited (MHL) (submission 31) requested the following changes to HPUDS :

- *That the map identifying the area available for greenfield growth be amended to include some of the adjacent rural residential land as defined in the MHL amended map.*
- *That the MHL land shown as greenfield growth land on the HPUDS website (i.e. the area identified as the Western Hill Residential Zone in the Napier District Plan) be expanded to include some of the surrounding Rural Residential land to align with the design led development concept (as presented to Napier Council and proposed to be followed by a private plan change request later this year).*
- *Identify the area as “Western Hills” in HPUDs not as “Taradale Hills” or “Mission”.*
- *Identify the yield of this greenfield growth area as 600 not 350 dwellings.*
- *Amend the wording in Appendix 8.8 of HPUDS*

Considerations and recommendations

HPUDS identifies greenfield growth areas and this includes “Taradale Hills” for Napier City which is the MHL land and corresponds to the Western Hills Residential Zoning in the Napier District Plan as shown on the HPUDS website.

Section 2.1.9 of HPUDS “Long Term Development Capacity” notes that the yields for the greenfield growth areas are indicative only and are subject to refinement as part of future structure planning and formal district plan change processes following further assessment. Therefore there is room for adjustment as long as the HPUDS principals are met.

The HPUDS relevant principles in this case are:

A range of densities in new residential development and more intensive redevelopment of existing urban areas that will continue to meet amenity values

Provide housing and lifestyle choice within defined locations with greater emphasis on good urban design outcomes as well as recognising an ageing population

Maintain the separation of defined urban areas by green and open space

Recognise versatile soils for productive purposes through minimising the need for urban development on such soils and providing for rural lifestyle development in other locations

Ensure there is a choice in the supply and location of residential living, commercial and industrial opportunities

Recognise the effects of climate change

Ensure that infrastructure servicing development is integrated with existing networks

The Working Group understand that the proposed development presented to the Napier City Council indicates a design led development concept which utilises the MHL land combining two adjacent land areas, “Western Hills Residential” and “Rural Residential” in a manner sensitive to the existing landscape values. The proposal will provide a variety of site sizes, interspersed with green spaces, and recognises the existing landscape values including the hill face as a backdrop to the existing winery.

As far as yield is concerned the HPUDS greenfield target is 350 for the residentially zoned portion of the site (70ha). However the Working Group understand that the rural residential part of the MHL land (196 ha) has a permitted potential yield of another 130 sites under the District Plan. The rural portion of the MHL land (22.6ha) has a permitted potential of another 6 sites. This adds up to nearly 500 sites and does not take into account that the residentially zoned land could be developed more intensively under the current District Plan provisions (currently zoned for a range site sizes from 200m² to 5,000m²).

As noted in the HPUDS documentation the figures are “indicative”. The concept plan presented to Napier City Council earlier this year apparently showed that there could be a potential yield of 550 to 600 dwellings. This yield will be dependent on the eventual design and the outcome of the private plan change process, however, it is prudent to indicate the potential yield based on the latest information in the revised HPUDS document.

We consider it is important to recognise that the indicative yields in HPUDS are not exact and their role is to merely assist in a high level analysis of long term urban development capacity and to inform sequencing decisions of the relevant territorial authorities.

In regard to the requested rewording of Appendix 8.8 this is appropriate and more correctly describes the subject greenfield growth area.

HPUDS Implementation Working Group’s Recommendation:

The changes as requested are made to the HPUDS documentation:

Amend map of area to red line as shown below:



Replace references to the 'Taradale Hills' or 'Mission' Greenfields Growth area to 'Western Hills'.

Amend Figure 6 in section 2.1.9 by deleting "Taradale Hills – 350 dwellings" and replace with: "Western Hills – 600 dwellings"

Amend Appendix 8,8 of HPUDS 2010 as follows:

This area is the area of land that ~~immediately adjoins~~ includes the Mission's Western Hills Residential Zone Plan Change fronting Puketitiri Road. This area can be readily serviced, and ~~is beyond~~ also if developed in association with replanting of the Taradale Hills backdrop to the City so there are no landscape issues can be addressed. The area is in close proximity to established residential areas for energy efficiency considerations. It is an appropriate location for a future greenfield expansion area 2015-2045.

Submission Theme 5.3: –Residential Supply Issues

Submissions addressed:

Paul Harris (submission 22) *was concerned about a shortage of residential sections in Napier, inappropriate level of development contributions and believes infill housing needs more consideration. Believes changes are required if Napier is to develop.*

Considerations and recommendations

The Working Group is reminded that one key aspect of HPUDS is to ensure a sustainable urban growth pattern for the Heretaunga Plains. In accordance with the community's preference to maintain the versatile land of the Heretaunga Plains for production purposes the direction for growth through to 2045 relies on Napier and Hastings having defined growth areas and urban limits with a need to balance increased intensification and higher densities against the provision of lifestyle choice. There needs to be a balance between supply and demand for greenfield residential housing options otherwise the intended goal of intensification is unlikely to occur. The strategy needs to make sure that there is sufficient supply to meet market demand over the life of the strategy while also influencing the market to move towards acceptance of higher residential densities than traditional housing types.

HPUDS actively encourages infill development and intends that over the life of the strategy greater emphasis is placed on this type of development. It is a core principle of HPUDS to achieve compact urban development but there remains recognition that it will take time to achieve widespread market acceptance of higher density living rather than an abrupt change in the supply side of development options.

In terms of reducing/deleting development levies to encourage infill development over greenfield options, the Working Group understands that the current NCC position is that the developer (as the beneficiary) pays and the costs of development are apportioned to their own specific development area rather than the whole of the city, or by a whole of catchment. This includes infill development which is currently expected to contribute towards the cumulative costs required to upgrade existing infrastructure to support increased urban density. Any change to this position would require a Council decision taking into account alternative sources of funding infrastructure (such as rates) but in any case is an issue and function for NCC outside of HPUDS.

HPUDS Implementation Working Group's Recommendations:

No changes are recommended to HPUDS as a result of this submission.

Submission Theme 5.4: –General Concerns With Growth

Submissions addressed:

- **Matt Edwards** (submission 15) raised concerns *about growth removing productive land for a variety of reasons (loss of valuable rural land for productive purposes, high risk from liquefaction, tsunami and flooding and other problems with existing urban growth such as low occupancy rates of dwellings). Mr Edwards supports Taradale Hills as a growth option.*

Considerations and recommendations

Mr Edwards support for development in Parts of the Taradale Hills is acknowledged. The Working group notes that this area has been identified and promoted as a potential greenfield growth option for Napier dating back to 1998 and indications are positive that it will be developed for residential purposes. ‘Reliance on a single growth option for the whole of the city comes with supply side risks and does not provide options around lifestyle choice. Residential development cannot be forced on unwilling landowners.

While the Taradale Hills is a preferred option for meeting certain market segments, the Working Group considers a range of housing options is required to meet lifestyle and locational choice and that involves providing some options for living on the Plains rather than all development being directed onto the hills. The retirement sector analysis suggest retirement units will represent 30-40% of all future new build housing in the Heretaunga Plains sub-region between now and 2045 with half of these likely in traditional retirement villages. The average size of villages of this kind is over 6 hectares and in all likelihood a significant proportion of this form of development will seek flat land opportunities on the fringe of existing urban areas for a range of factors including mobility issues associated with aged care.

The method of developing structure plans and rezoning greenfield options requires consideration and assessment of, among other things, natural hazards. Provided some methods can be adopted to address the likely impacts of natural hazards there should be no reason why the flatter areas should be excluded from consideration for supporting greenfield growth options. The existing identified greenfield growth areas in HPUDS have, at this point in time, no known fatal flaws associated with natural hazards that would preclude them from supporting urban growth.

HPUDS Implementation Working Group’s Recommendations:

No change to the review of HPUDS as a result of this submission.

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Implementation Working Group Recommendations: Theme 6 – Non-Location Specific General Submissions

Submissions Addressed in this Document		
Sub #	Submitter Name	Submission Theme
34	Mohi, Rose	6.1 General – Aquifer concerns
49	Warren, Mary Ellen	6.2 General - Premature until liquefaction report available and coastal hazard consultation complete – How will future large scale Tourist / commercial and institutional uses be accommodated?
45	Te Taiwhenua o Heretaunga	6.3 General - Protect water quality - supports papakainga
23	Hawke's Bay Fruitgrowers Association	6.4 General - Support 2010 HPUDS oppose reserve and new areas
36	New Zealand Transport Agency	6.5 General - support strategy
30	Mangin, Gillian	6.6 General - Supports strategy - hard line on additional greenfields / reserve.
54	Horticulture NZ	6.7 'Versatile land' references; retirement housing needs in greenfield areas
18	Graeme Lowe Properties Limited & Lowe Family	6.8 Seeks a new process for moving reserve areas to becoming greenfield areas
37	Guy Pankhurst	6.9 General – Greenfield options to be achievable, provision for housing needs of elderly, and greater recognition of papakainga
21	Harkness, Richard	6.10 National Policy Statement on Urban Development Capacity

Submission Theme 6.1: General - Aquifer concerns

Submissions addressed:

Rose Mohi (submission 34) made a number of general submission points including suggestions that further expansion onto fertile Plains soil around Hastings should not be allowed; and no further development over Heretaunga Plains aquifer, especially no industrial development in vicinity of Roy's Hill and Brookvale Road.

Considerations and recommendations

HPUDS 2010 already acknowledges the importance of the Heretaunga Plains aquifer system and the versatile/productive soils and the 2016 Review doesn't propose to alter that recognition. We note that the selection of appropriate greenfield growth areas considered a range of issues including potential impacts of development on nearby sensitive waterbodies and production land, but we are also cognisant that not allowing any further urban growth onto existing margins of urban Hastings could have the following effects:

- 1) need to move more abruptly to intensification potentially stimulating greater community resistance
- 2) less affordable housing choices due to servicing costs
- 3) increased housing costs due to imbalanced supply choices
- 4) people move to Napier Greenfield sites where sites will likely be cheaper
- 5) greater car dependency, fuel use and carbon emissions as people live further away from employment nodes i.e. Havelock North Hills and Napier
- 6) identified areas remain unproductive as lifestyle blocks.

This would conflict with the Strategy's principles. The Strategy strikes a balance between quality living environments, housing choice and affordability and balanced supply between Hastings, Havelock North and Napier with minimal impact on productive soils for housing. It also allows for a more even transition and is therefore more likely to gain community acceptance.

While HPUDS does provide for further limited growth, around existing settlements, (including some locations over the Heretaunga Plains aquifer system), it also contains the following two key approaches to ensure any effects are mitigated.

- 1) that an integrated, sustainable approach to the three urban waters (water supply, wastewater and storm water) occurs so that the use or discharge of one does not impact negatively on the other;
- 2) water, wastewater and stormwater management is developed with protection of ecological values a key outcome.

To achieve this for example, we note that various agencies implement a range of actions and planning processes and water quality objectives are not solely implemented via HPUDS alone.

HPUDS Implementation Working Group's Recommendation:

No changes to HPUDS2016 recommended as a result of this submission.

Submission Theme 6.2: General – hazard information and large-scale developments

Submissions addressed:

Mary Ellen Warren (submission 49) made a number of general points in her submission, including querying how HPUDS would accommodate large-scale commercial and institutional uses and also suggesting that completing HPUD2016 Review is premature ahead of new liquefaction hazard information and completion of coastal hazards consultation.

Consideration and recommendations

The Working Group understands that the Heretaunga Plains is at risk of numerous natural hazards. Those of particular relevance are flooding, earthquake, tsunami and coastal erosion. Understanding of the likelihood and consequences of such natural hazards will continue to evolve over the HPUDS' 30-year planning period and beyond. We are aware that another joint-council project is underway considering planning and actions to deal with coastal hazards. We do not think that the HPUDS Review needs to be placed 'on hold' until that project and further liquefaction research is completed.

In relation to large-scale institutional commercial and tourism activities, we were advised that the needs, timing and infrastructural requirements of these types of activities are difficult to assess in a strategic planning process. HPUDS does not shut the door on prospective tourism and large-scale commercial activities, but they would nevertheless be subject to an assessment on their merits against the relevant district planning zoning provisions, either by way of a resource consent application or a plan change process. We are satisfied that the HPUDS 2016 Review does identify sizeable areas of land for industrial activity, which may be suitable for some activities as is the case in some other cities.

HPUDS Implementation Working Group's Recommendations:

No changes to HPUDS 2016 recommended as a result of this submission.

Submission Theme 6.3: General – Water quality and papakainga

Submissions addressed:

Te Taiwhenua o Heretaunga (submission 45) raised a number of general points in their submission including suggesting that:

1. the Review needs to have reassessed ‘safe landuse’ and starting point for strategy needs to be a higher standard of drinking water quality
2. discharges into the Karamu Stream need to be stopped and diverted over the next 30 years
3. papakainga policy [presumably in reference to Hastings District Plan content] is supported and
4. marae-based reservations and facilities need to be supported in similar way as papakainga, esp. given progression of Treaty Settlement claims.

Consideration and recommendations

HPUDS 2010 already acknowledged the importance of the Heretaunga Plains aquifer system. The 2016 Review doesn't propose to alter that recognition. The selection of appropriate greenfield growth areas considered a range of issues including potential impacts of development on nearby sensitive waterbodies. We were advised that how discharges into the Karamu Stream are managed into the future is not solely a matter for this HPUDS Review process. HPUDS is a 30-year strategy for managing urban development and as such, it does not attempt to direct how impacts of rural activities on freshwater ought to be controlled. Furthermore, it is expected that the Greater Heretaunga catchment planning process (TANK) being coordinated by HBRC will build on these objectives to achieve sustainable outcome for fresh water over time.

HPUDS does not propose to constrain papakainga housing to only a small selection of locations within the Heretaunga Plains sub-region. However, the identification of several ‘marae-based’ housing nodes at Bridge Pa and Omahu might create unnecessary ambiguity by implying that those are the only suitable locations for marae-based housing. Rather the intention is that development of other marae and Maori owned land is not precluded by HPUDS, provided such developments can independently meet the servicing requirements and the relevant district plan requirements. Recent examples of this are in the Waipatu and Waiohiki areas. This suggests councils can (and do) already choose to support marae-based reservations and facilities as part of their broader Local Government Act roles.

HPUDS Implementation Working Group's Recommendations:

- 1. Amend HPUDS2016 the last paragraph of Section 2.1.8 to further clarify development of marae and Maori owned land for housing is not precluded by HPUDS, but such developments will nonetheless have to meet servicing requirements and relevant district plan requirements so it reads as follows:**

“Bridge Pa and Omahu as Marae Based Settlements represent but two locations where that may be appropriate for providing choice in the housing needs for maori. Their identification and inclusion in the growth target allocations does not preclude development of other marae and Maori owned land, providing that they can independently meet the servicing requirements and the district plan provisions. Papakainga housing is not included within the quantities of projected housing demand and housing needs so is not limited to a small selection of locations within the Heretaunga Plains sub-region. District Plans may need to consider Maori aspirations in this regard. Indeed, in the period 2010 to 2015, multiple unit papakainga developments have been constructed in the Waipatu and Waiohiki areas.”

- 2. No other changes recommended as result of this submission.**

Submission Theme 6.4: General – support HPUDS2010 & oppose ‘reserve areas’

Submissions addressed:

The Hawkes’s Bay Fruit Growers’ Association (submission 23) raised a number of points in their submission which suggested

1. 5-yearly review timeframe should be lengthened for future reviews.
2. Arataki Extension should not be “written-off” at this early stage.
3. Opposition to ‘additional areas’ (South Pirimai and Brookvale) and ‘reserve areas’ (part Romanes Drive; part Middle Road; Murdoch Road; Wall Road) that are included in the draft HPUDS2016 compared to HPUDS2010.

Consideration and recommendations

We had previously given very careful consideration to the scope of the first 5-yearly review. This was done in full knowledge that the Strategy’s planning period (2015-2045) had only just commenced, but a range of actions and events had transpired since HPUDS2010 was adopted. A five yearly review is considered appropriate given the pace of change in modern society and particularly given some of the experiences encountered within the first five years of HPUDS implementation.

In our recommendations regarding a submission from Hastings District Council (refer Theme 1.2), we are certainly not ‘writing off’ Arataki Extension as a potential future residential greenfield growth area. There is no clear and obvious remedy to the odour issues associated with the mushroom farm, so the Arataki Extension location is appropriately placed ‘on hold.’ If Arataki Extension AND Brookvale were retained as is suggested by HDC (at least in the short-term), that would skew total residential development numbers informing the Strategy’s preferred settlement pattern.

Given the relative short-term uncertainty of a solution to the odour issues presenting at the Arataki Extension option, it is considered appropriate to reclassify Arataki Extension as a ‘Reserve Area’ in HPUDS2016, but with a clear statement intending to review that classification as part of future regular five-yearly Reviews of HPUDS. If Arataki is brought back into the settlement pattern as a confirmed area we would anticipate another area being removed if the development drivers and projections have not changed to avoid this potential skewing of total development numbers.

In more general terms we consider that the concept of ‘reserve area’ has merit and is not recommended to be discarded. Amendments are recommended (refer Theme 6.8) to better clarify the purpose of reserve areas and the associated process(es) to transfer a ‘reserve area’ to replace a growth area which had been identified in HPUDS, but was no longer able to be developed to meet projected needs and demands. If these areas are not ultimately needed they will remain available for primary production. If they are needed then presumably another area has not been developed and remains available for primary production, unless there are significant and rapid changes in growth drivers. A five yearly review timeframe, rather than 10 years, enables HPUDS to be fine-tuned through a transparent process to accommodate changes in growth demand, rather than deferring too quickly to these reserve areas, unless the speed and scale of such changes necessitates it.

HPUDS Implementation Working Group’s Recommendations:

No changes recommended as a result of this submission, but also refer to:

- Theme 6.8 – amendments to clarify ‘reserve area’ classification and associated processes;
- Theme 1.2 – amendments to reclassify Arataki Extension as a ‘reserve area.’

Submission Theme 6.5: General – Support for 2016 Strategy

Submissions addressed:

The New Zealand Transport Agency (submission 36) raised the following in their submission:

1. Supports strategic approach that the councils and their partners can work towards – being crucial for development of various local and national land transport plans and programmes.
2. Signals willingness to continue working with the councils in implementing the Strategy regarding provision of transport infrastructure.

Consideration and recommendations

Support for Strategy is noted, as is NZTA's willingness to assist where relevant regarding implementation.

HPUDS Implementation Working Group's Recommendations:

No change to the review of HPUDS as a result of this submission.

Submission Theme 6.6: General – Supports Strategy, but opposes further greenfield developments

Submissions addressed:

Gillian Mangin (submission 30) raised a number of points in her submission which are included suggesting that:

1. HPUDS must continue to “hold the line” against residential, commercial and industrial expansion onto versatile soils of the Plains.
2. The Strategy needs to be flexible to changing productive land use emerging in response to changing climate over the medium term.
3. no ‘Reserve Areas’ should be identified on the Plains. Any ‘Reserve Areas’ should be off the Plains.
4. ‘Reserve Areas’ risk end up being advanced without following due consideration of HPUDS’ preferred staged and sequenced greenfield areas.
5. Hastings DC needs to make better provision for inner city off-street parking.

Consideration and recommendations

The original principles in HPUDS 2010 have not been altered as part of the 2016 Review so the general settlement pattern remains the intent. In our recommendations regarding a submission from Hastings District Council (refer Theme 1.2), we noted there is no clear and obvious remedy to the odour issues associated with the mushroom farm, so the Arataki Extension location is appropriately placed ‘on hold.’ If Arataki Extension AND Brookvale were retained as is suggested by HDC (at least in the short-term), that would skew total residential development numbers informing the Strategy's preferred settlement pattern.

Given the relative short-term uncertainty of a solution to the odour issues presenting at the Arataki Extension option, it is considered appropriate to reclassify Arataki Extension as a ‘Reserve Area’ in HPUDS2016, but with a clear statement intending to review that classification as part of future regular five-yearly Reviews of HPUDS. If Arataki is brought

back into the settlement pattern as a confirmed area we would anticipate another area being removed if the development drivers and projections have not changed to avoid this potential skewing of total development numbers.

In more general terms, we consider the concept of 'reserve area' has merit and is not recommended to be discarded. Amendments are recommended (refer Theme 6.8) to better clarify the purpose of reserve areas and the associated process(es) to transfer a 'reserve area' to replace a growth area which had been identified in HPUDS, but was no longer able to be developed to meet projected needs and demands. While staging and sequencing of identified greenfields growth areas are matters for the local Council's to determine given the high level of public infrastructure and cost involved, reserve areas are not staged, other than, when necessary, to substitute for another planned area, all other things being equal. If 'reserve areas' are to be retained, then it is impractical that any such reserve areas are located "off the Plains" as that would have them located on the surrounding hills (for example, Havelock North and Taradale) which would present other challenges and issues.

We agree with advice from the Technical Advisory Group that provision of off-street inner city parking is a specific detail that HPUDS as a strategic level document does not seek to guide or direct.

HPUDS Implementation Working Group's Recommendations:

No specific changes recommended as a result of this submission, but also refer to:

- Theme 1.2 – amendments to reclassify Arataki Extension as a 'reserve area'.
- Theme 6.7 – amendments to versatile land; monitoring and reporting of overall development pattern;
- Theme 6.8 – amendments to clarify 'reserve area' classification and associated processes;

Submission Theme 6.7: General - 'Versatile land' references; retirement housing needs in greenfield areas

Submissions addressed:

Horticulture New Zealand (submission 54) raised a number of points in their submission including suggesting:

1. replacing references to productive/versatile/fertile soils etc with references to 'versatile land'
2. concerns that greenfields are increasingly featuring as a form of development rather than Strategy's intention for intensification.
3. concerns that residential greenfields may not actually be used for retirement housing, yet retirement developments then likely to seek new greenfield development locations – therefore specific provision should be made for retirement facilities.
4. future Reviews of HPUDS clearly monitor and report on the overall development pattern targets (i.e. greenfields : infill : lifestyle : etc).

(Note: Another aspect of this submission relating to Brookvale is addressed in 'Theme 1'.)

Consideration and recommendations

The submissions refer to reserve areas possibly exacerbating the greenfields development trend. We consider that the concept of 'reserve area' has merit and is not recommended to be discarded. Amendments are recommended (refer Theme 6.8) to better clarify the purpose of reserve areas and the associated process(es) to transfer a 'reserve area' to replace a

growth area which had been identified in HPUDS, but was no longer able to be developed to meet projected needs and demands.

The Working Group oversaw an evaluation of housing needs for the retirement sector during Stage 2 of the 2016 HPUDS review. That report by EMS Ltd (Tonks) noted that over the next 30 years the 65+, 75+ and 90+ age groups will increase by 94%, 173% and 286% respectively. The Tonks report suggested retirement units will represent 30-40% of all future new build housing in the Heretaunga Plains sub-region between now and 2045, with half of these likely in 'traditional' retirement villages. The Working Group was advised that such housing is a much higher density and a very efficient use of greenfields land by comparison to the more traditional greenfields development.

What is of more concern is that other developers may take up the available greenfields supply for lower density greenfields development at the expense of retirement villages and mean creating pressure for further greenfields land for retirement village development and as a consequence the intensification targets may be impacted. One option is to reserve (or set aside) some greenfields sites specifically retirement villages. Whether that occurs given the change in relative demand for retirement housing remains to be seen and at present there is insufficient evidence to interfere in the market to the extent proposed by the submitter, unless further sites are identified. We accept that the submitter's concern is valid and should be carefully monitored. Nonetheless, no immediate change to the HPUDS settlement pattern is considered necessary as a result of findings in the Tonks report; rather what is required is an awareness that the type of homes built within the Heretaunga Plains sub-region is going to change over the study period to meet the demands of the aging population. In addition there will be a need for developers to be able to aggregate larger blocks within residential greenfield growth areas in suitable locations to accommodate retirement villages of 6ha and more in size.

We acknowledge and recommend that retirement housing needs is something warranting specific monitoring during the remainder of the 30 year HPUDS planning period. Future regular 5-yearly reviews will assess the monitoring data for emerging needs over and above current projections. In this way, HPUDS2016 does not need an immediate overhaul to accommodate a flood of retirement housing demand in the short-term.

We agree that there are various interchangeable references to productive land and soils etc which is potentially confusing. Consistent references to the term 'versatile land' is recommended.

In terms of monitoring and reporting overall settlement pattern trends, we were advised that HPUDS2010's preferred settlement pattern promoted a transition towards greater intensification over the 30 year planning period. This is the first 5-year Review of HPUDS and just entering the 2015-2045 planning period to which HPUDS applies. We were advised that while there appears to be trend toward a greater proportion of urban development in greenfields locations it is still early days. Even though this appears to be the case the trend has been for rural development to remain strong, rather than reducing, so that the actual greenfield land demand over the past five years has nevertheless been within HPUDS expectations. The Phase 1 Review Reports did report on the Distribution of New Housing Growth 2000-2015 and Review of Greenfield Land Supply and Housing Affordability, but improved monitoring of overall development pattern targets would assist future Reviews and better inform whether those Reviews needed to re-orientate implementation to ensure overall goals could still be achieved over time.

HPUDS Implementation Working Group's Recommendations:

- 1. Replace (or insert) references to versatile soils, productive soils, fertile soils, productive land etc with references to 'versatile land' where relevant throughout HPUDS2016.**

2. Include definition of 'versatile land' into HPUDS2016 Glossary as being the same as included in the Hawke's Bay Regional Resource Management Plan's glossary.
3. Amend HPUDS2016 Implementation Plan to ensure monitoring and regular reporting against overall residential development pattern targets by amending clause 22 to read as follows:

"Monitor growth management drivers and trends in demographics, growth and development, including:

- Uptake rates and land availability*
- Migration to determine its relationship to growth rates and growth impact in the area*
- Distribution of growth by type e.g. Infill:Greenfields:Lifestyle/Rural*
- Rural-residential sub-division,*
- Economic development implementation*

and report on such monitoring on a regular basis to the HPUDS IWG and Partner Councils."

4. Also refer to:
 - Theme 6.8 – amendments to clarify 'reserve area' classification and associated processes;
 - Theme 1.2 – amendments to reclassify Arataki Extension as a 'reserve area'

Submission Theme 6.8: General – process for 'reserve areas'

Submissions addressed:

Graeme Lowe Properties Limited & Lowe Family Trust (submission 18) requested a process for moving 'reserve areas' to becoming approved greenfield growth areas, be included in HPUDS2016 with the specific intent of giving priority to identified reserve areas becoming greenfield growth areas over other areas within the region.

(Note: The remainder of this submission is addressed in 'Theme 2'.)

Consideration and recommendations

We incorporated a 'reserve' growth area concept into the draft HPUDS2016 to assist the councils to provide flexibility in development staging and sequencing so that an adequate supply of new sites is provided while still avoiding difficulties associated with oversupply and ad-hoc development contrary to HPUDS. After considering several submissions on 'reserve areas', we still consider that the concept of 'reserve area' does have merit and is not recommended to be discarded.

We intend that reserve areas will act as potential replacements of a nearby greenfield growth area if that greenfield growth area proves unviable or unavailable for development; or in circumstances where the area is not able to be progressed in a timely fashion when required; or when other issues become insurmountable. Alternatively, the reserve areas may also be advanced if there is a rapid or significant change in growth demand which greenfield growth areas cannot accommodate alone, or when a reserve area has been identified as a greenfield growth area in earlier version of HPUDS but was not able to be progressed due to issues which have now been overcome. Reserve areas will not be progressed in any other circumstances by the HPUDS partner councils.

A 'reserve area' classification does not enable leap-frogging over pre-identified greenfield growth areas where the circumstances outlined above do not exist. Reserve areas have first priority for inclusion as a new greenfield growth area when any of the circumstances outlined above exist. As such, the inclusion of an area not currently listed in HPUDS would only be

possible when there is no identified Reserve Area for the city, town or settlement where the identified greenfield growth area that needs replacing is located. HPUDS2016 as currently worded does not reflect this intent.

We do not consider that it is necessary to have 'reserve areas' for every identified greenfield growth location in HPUDS, but it is prudent to have them available for the main urban areas of Napier City and Hastings District. It should also be noted that while the greenfield growth areas identified in HPUDS and any reserve areas that might also be identified in HPUDS would have passed a preliminary assessment of residential (or business use) development suitability through the HPUDS process, they will each still be subject to fuller and more rigorous assessment (i.e. structure planning, rezoning proposals etc) to determine their appropriateness, before urban development is committed to within these areas.

We recommend that Figure 7 in draft HPUDS2016, which outlines a process for introducing Greenfield Growth Areas not already Identified in the HPUDS Settlement Pattern, be amended to insert a new step two which requires a 'reserve area' to take the place of an identified greenfield growth area in the first instance.

HPUDS Implementation Working Group's Recommendations:

Amend Figure 7 of HPUDS2016 to insert a new step two i.e. between "New Area is Proposed for Development" and "Apply RPS Criteria (Policy UD4.2)" as follows:



Select an area which is identified as a 'Reserve' Greenfield Growth Area in HPUDS as the 'Proposed Development Area'. This step is not applicable for those towns or settlements which do not have an identified Reserve Area.

Submission Theme 6.9: General - Greenfield options to be achievable, housing needs of elderly, and greater recognition of papakainga

Submissions addressed:

Guy Pankhurst (submission 37) raised a number of points in his submission which included:

1. Generally supporting the intent and conclusions of the 2016 Review, and acknowledges the significant reporting that substantiates the conclusions.
2. Suggesting that the greenfield options have to be realistic and achievable, not only from councils' perspectives, but also from developer and market driver perspectives.
3. Suggesting further evaluation be done on the housing needs of elderly given projected increase in retirees in coming years.
4. Suggesting HPUDS needs to more strongly recognise that papakainga is a credible and necessary living option for Maori, and that district plans should be more receptive to alternative living options than traditional greenfield and infill housing.
5. Also refer to separate comments and recommendations in Theme 4 for:
 - a. The Loop/Bledisloe Road extension;
 - b. Taradale hills developments.

Consideration and recommendations

HPUDS2010 (and 2016) identify criteria to inform selection of appropriate locations for greenfield growth (both residential and business land). Market appeal and developer costs were also considered at the outset of HPUDS through the Phase 1 Market Demand Report. The HPUDS criteria elaborates on HPUDS' six guiding principles – one of which is

“community and physical infrastructure is planned, sustainable and affordable.” HPUDS’ identification of appropriate greenfield growth areas is akin to an initial screening, as any development location will be subject to further detailed evaluation (such as via structure planning, district plan rezoning or a resource consent application) of its merits, its impacts, and its costs before proceeding to physical works.

The Working Group oversaw an evaluation of housing needs for the retirement sector were evaluated during Stage 2 of the 2016 HPUDS review. That report by EMS Ltd (Tonks) noted that over the next 30 years the 65+, 75+ and 90+ age groups will increase by 94%, 173% and 286% respectively. The Tonks report suggested retirement units will represent 30-40% of all future new-build housing in the Heretaunga Plains sub-region between now and 2045, with half of these likely in ‘traditional’ retirement villages. Nonetheless, no immediate change to the HPUDS settlement pattern is considered necessary as a result of findings in the Tonks report; rather what is required is an awareness that the type of homes built within the Heretaunga Plains sub-region is going to change over the study period to meet the demands of the aging population. In addition there will be a need for developers to be able to aggregate larger blocks within residential greenfield growth areas in suitable locations to accommodate retirement villages of 6ha and more in size.

We acknowledge and recommend that retirement housing needs is something warranting specific monitoring during the remainder of the 30 year HPUDS planning period. Future regular 5-yearly reviews will assess the monitoring data for emerging needs over and above current projections. In this way, HPUDS2016 does not need an immediate overhaul to accommodate a flood of retirement housing demand in the short-term.

HPUDS does not propose to constrain papakainga housing to only a small selection of locations within the Heretaunga Plains sub-region. However, the identification of several ‘marae-based’ housing nodes at Bridge Pa and Omaha might create unnecessary ambiguity by implying that those are the only suitable locations for marae-based housing. Rather the intention is that development of other marae and Maori owned land is not precluded by HPUDS, provided such developments can independently meet the servicing requirements and the relevant district plan requirements. Recent examples of this are in the Waipatu and Waiohiki areas. This suggests councils can (and do) already choose to support marae-based reservations and facilities as part of their broader Local Government Act roles.

HPUDS Implementation Working Group’s Recommendations:

- 1. Amend HPUDS2016 Section 2.1.8 to further clarify development of marae and Maori owned land for housing is not precluded by HPUDS, but such developments will nonetheless have to meet servicing requirements and relevant district plan requirements so it reads as follows:**

As Marae Based Bridge Pa and Omaha Settlements represent but two locations where that may be appropriate for providing choice in the housing needs for maori. Their identification and inclusion in the growth target allocations does not preclude development of other marae and Maori owned land, providing that they can independently meet the servicing requirements and the district plan provisions. Papakainga housing is not included within the quantities of projected housing demand and housing needs so is not limited to a small selection of locations within the Heretaunga Plains sub-region. District Plans may need to consider Maori aspirations in this regard. Indeed, in the period 2010 to 2015, multiple unit papakainga developments have been constructed in the Waipatu and Waiohiki areas.

- 2. No other specific changes recommended as a result of this submission.**

Submission Theme 6.10: –National Policy Statement on Urban Development Capacity

Submissions addressed:

Richard Harkness (submission 21) on behalf of Durham Properties requested:

- *that HPUDS embraces the direction of the proposed National Policy Statement on Urban Development Capacity 2016 (NPSUDC) and other initiatives that aim to address urban growth issues through local authorities planning for growth and change, and providing critical infrastructure (by reducing regulatory barriers, enhancing infrastructure provision and connecting planning decisions to economics).*

Considerations and recommendations

In terms of the NPSUDC, HPUDS is a collaborative approach by the Hastings District Council, Napier City Council and Hawke's Bay Regional Council to provide comprehensive, integrated and effective growth management strategy for the Heretaunga Plains sub-region over the 2015 to 2045 period.

HPUDS will be adapted to take into account changing circumstances over the 30 year timeframe. The Strategy is intended to adapt to changing trends over time through 5 yearly reviews, which is supported by regular monitoring of supply and demand trends and a range of other factors.

The HPUDS partner councils are therefore already taking action which amounts to many of the requirements proposed to be placed on councils via the NPSUDC. As outlined above, HPUDS is a joint strategy that is already in place for coordinated management of urban development within the Heretaunga Plains sub-region. We need to record that at the time of hearing submissions on the HPUDS Review in October 2016, the NPSUDC was only a proposed document. The NPSUDC was and came into force on 1 December 2016.

Over the last few years, implementation of HPUDS has already seen amendments to the Regional Policy Statement (by way of plan 'Change 4') and amendments to both the Hastings and Napier district plans. In addition to those RMA planning documents, the councils have taken steps to align their respective 30-year Infrastructure Strategies and Long Term Plans with the projected needs for housing and business land. A lot of that effort already goes a long way to fulfilling many of the NPSUDC's requirements for 'medium growth areas, notwithstanding the fact that currently, Napier and Hastings are not 'medium growth' urban area within the NPSUDC's statistical classifications. The HPUDS partner councils are already actively providing for sufficient capacity for medium and longer term housing needs and business land projections in their relevant regional and district planning documents while being cognisant of reducing unnecessary regulatory barriers, enhancing infrastructure provision and connecting planning decisions to economics.

HPUDS Implementation Working Group's Recommendations:

No change to the review of HPUDS as a result of this submission.