

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of the Proposed District Plan

BY **THE SURVEYING COMPANY H.B.
LIMITED**

Submitter

AND **CENTRAL HAWKES BAY
DISTRICT COUNCIL**

Territorial Authority

**SUBMISSION OF THE SURVEYING COMPANY H.B. LIMITED
To Hearing No 5 Subdivision
Dated 7 September 2022**

The Surveying Company
3/115 Avenue Road East
Hastings 4156

Ladies and Gentlemen of the Hearings Panel.

My name is Nick Wakefield, and I am here on behalf of the Surveying Company to present our case for changes to the Proposed District Plan (Subdivision Rules and Performance Standards).

I thank you for this opportunity.

We note that our submission points have been addressed in

Section 42A report – Subdivision (General)

We will address our points in the order they are presented in this report for ease of reference.

Boundary Adjustments – Rule SUB - R4

In our submission we requested that the definition of “boundary adjustment” be amended substituting the words “records of title” for the word “allotment” in this definition. We, as surveyors, who deal with these items at the coal face, believe that our wording is a more accurate definition of what occurs in a boundary adjustment. We note that the definition has been sourced from the National Planning Standards, but we can see issues occurring in the future with this limited view of what a boundary adjustment is. We ask the panel to consider using our alternative definition.

Rule SUB-R7 – Subdivision to create lifestyle sites in association with the creation of a conservation lot.

We have already provided the panel with information in regard to conservation lots in our hearing appearance in hearing 3, including the current rules used for conservation lots within the Auckland supercity. We will not reiterate our position in this particular hearing, except to say that we do not agree with the Officers’ position, and we believe that additional lifestyle lots should be able to be created in conjunction with conservation lots as the size of the proposed conservation Lot increases.

Standard SUB-S1 – Minimum Net Site Area – Settlement Zone

We believe that the minimum net site area of 600m² where public sewage reticulation is available is currently set too large for the Settlement Zone. We note that in the Officers’ Planning Report that they have stated that the average (mean) lot size could be subdivided within the Otane Settlement. We have undertaken our own analysis and we agree with the Council’s determination of the mean site size in Otane being 1359 m². However, mean averages are highly susceptible to the influence of outliers, particularly in data sets of the small nature of Otane or the other settlement zones. A more appropriate statistical average for these types of datasets could be found using either a median or a mode average value. In the three settlement zones that have sewage reticulation available, being Otane, Porangahau and Takapau these are all 1012m² or a quarter acre.

Further analysis has found approximately two thirds of the parcels in Otane, Porangahau and Takapau are less than 1350m² which, in our opinion, is the minimum area required to comply with the proposed rules.

This means that most subdivisions in these Settlement areas will end up being Discretionary Activities as only a third of the sites can comply with the minimum net site rules proposed. If the proposed rule was to strike a balance between retaining the feel of the area and allowing for further development, then in our opinion, it has missed the mark.

We believe that the panel must also take into account s5 of the RMA, particularly point 5(2)(a) – sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations.

We know there is a housing shortage in this country and one of the biggest barriers to providing housing is the lack of land supply around reasonable infrastructure. We believe Council has a duty of care to use existing infrastructure to its most efficient needs and to upgrade if necessary. Rather than restricting development in the settlement zones where sanitary infrastructure is available, Council should be encouraging development in these areas so that these services can be best utilised.

We accept the concerns of the Officer that the reduction of sites within these townships could affect the existing feel of these settlements. However, we believe that our proposed 450 m² net site area strikes a balance between retaining the feel of these settlements while providing for a community need, being housing.

Standard SUB-S1 – Minimum Net Site Area – Large Lot Residential Zone

It is for similar reasons that we do not support the 800m² minimum net site area within the Large Lot Residential Zone. Where infrastructure is available then we should be doing all we can to utilise it accordingly.

We proposed in our submission that this value should be 600m². This is still a large section and the two coastal settlements that have sanitary infrastructure available, Te Paerahi (council owned) and Kairakau (Private scheme), have multiple sites that are smaller than this figure.

Our Professional opinion is that the smaller lot size we have proposed, is in keeping with the areas where sanitary infrastructure is available while also taking into account section 5(2)(a) of the Resource Management Act.



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B R Foote



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N R H Wakefield

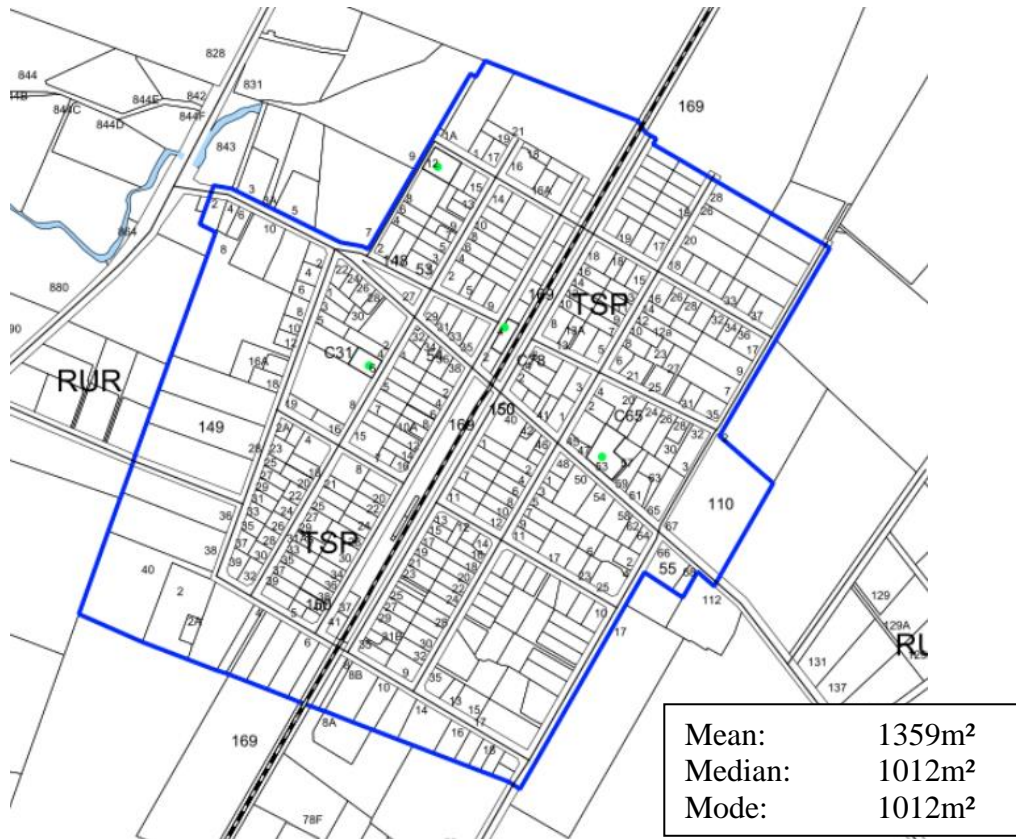
Dated this 7th day of September 2022

Appendix items

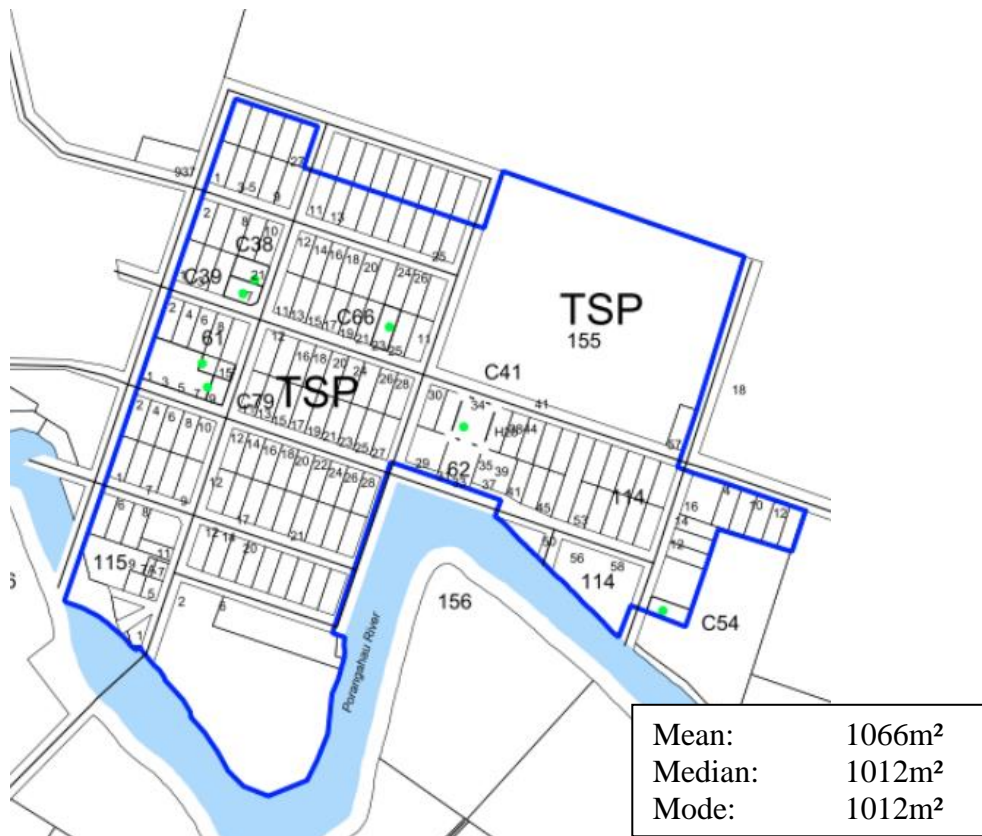
Mean Median and Mode values for the site areas of:

- Otane
- Porangahau
- Takapau
- Te Paerahi
- Kairakau

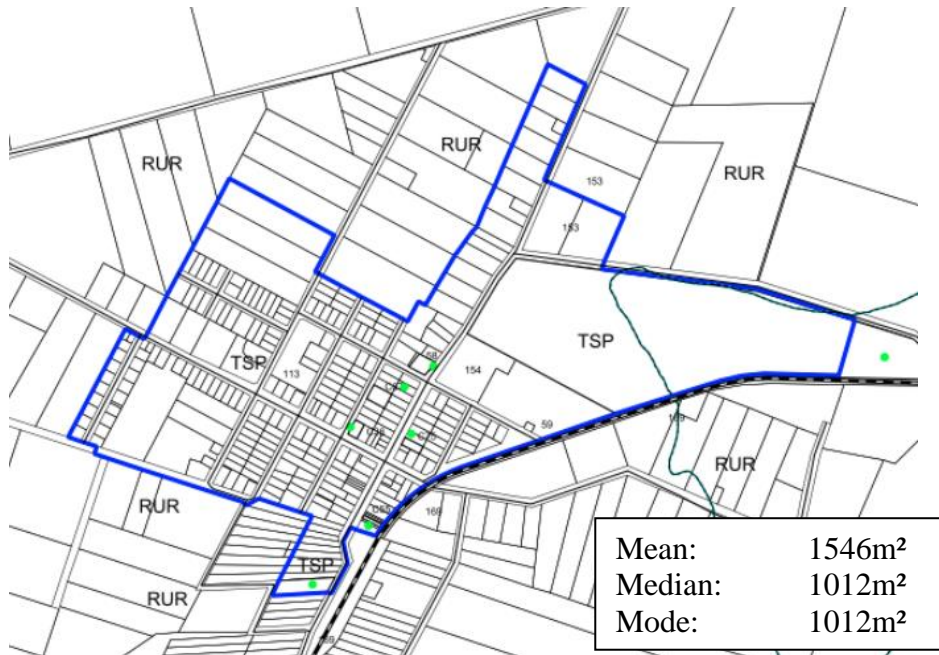
Otane



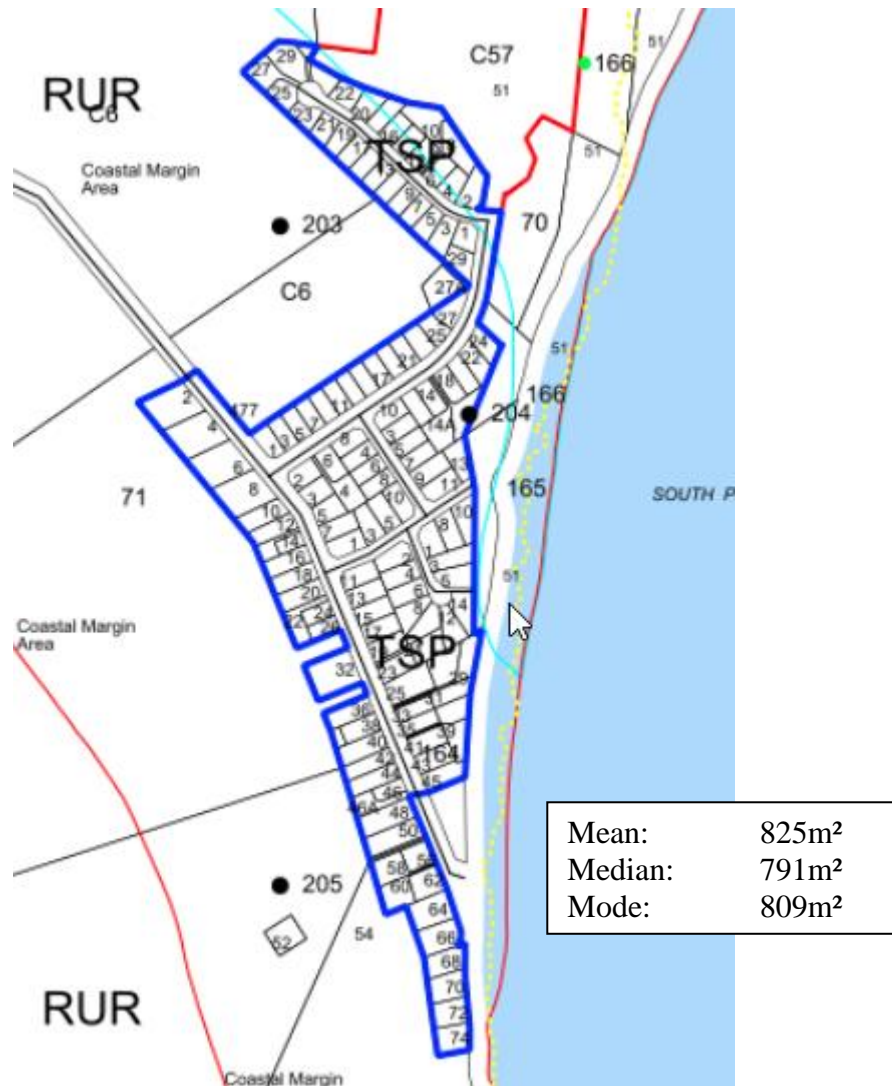
Porangahau



Takapau



Te Parehi



Kairakau

