

30 April 2020

By email: [districtplanreview@napier.govt.nz](mailto:districtplanreview@napier.govt.nz)

Dear Napier City Council

### District Plan Review Discussion Document.04 – Growth in the Hills

Thank you for the opportunity to provide feedback to the District Plan Discussion Document ‘Growth in the Hills’. These preliminary comments have been prepared by the Policy and Planning team at Hawke’s Bay Regional Council (HBRC). We would like to highlight that given the timing of the consultation, other teams within the organisation have not had an opportunity to provide input into this feedback due to the COVID-19 crisis. We would like to provide any supplementary comment, if necessary, once key staff become available and are no longer deployed to Civil Defence functions, we trust this will be acceptable.

We acknowledge NCC’s proposal to plan for growth as outlined in the discussion document. As you are aware, HBRC seeks to ensure effective management of growth in the region and that planning for growth complies with OBJ UD4 (below) as set out in the Regional Policy Statement (RPS) to avoid inappropriate and ad-hoc development.

*OBJ UD4 - PLANNED PROVISION FOR URBAN DEVELOPMENT (HERETAUNGA PLAINS SUB-REGION)*

*Enable urban development in the Heretaunga Plains sub-region, in an integrated, planned and staged manner which:*

- a) allows for the adequate and timely supply of land and associated infrastructure; and*
- b) avoids inappropriate lifestyle development, ad hoc residential development and other inappropriate urban activities in rural parts of the Heretaunga Plains sub-region.*

Whilst we support NCC’s desire to direct growth away from the coast, the flatlands and productive soil, we would welcome further discussions on these growth areas as they have not been identified as residential greenfield growth areas or reserve areas in the Heretaunga Plains Urban Development Strategy (HPUDS). As mentioned in HPUDS, any growth areas are to be decided in collaboration with Hawke’s Bay Regional Council and Hastings District Council, prior to any re-zoning taking place. This will ensure that the whole of the Heretaunga Plains area will be considered when any new growth areas are proposed.

Section 4 and appendix D of the technical document are helpful to show how the growth areas will meet the Managing the Built Environment chapter in the RPS. Any structure planning on the growth areas will need to confirm that the growth areas can support a compact urban form, and infrastructure, including public transport, can be made available with development at a reasonable cost. The growth areas would also need to comply with the whole of the RPS and Regional Plan.

Consideration should be given to the Proposed TANK plan change (PC9) to the RRMP. As you are probably aware HBRC will be notifying the TANK plan change on 2 May 2020. The TANK plan change is proposing to add new rules to the Regional Resource Management Plan to manage water quality and quantity for the Tūtaekurī, Ahuriri, Ngaruroro and Karamū (TANK) catchments. The new rules will better manage stormwater through integrated and low impact approaches to the design and management of stormwater networks. NCC will work with HBRC to prepare integrated catchment management plans that identify opportunities to improve stormwater. Stormwater runoff will also need to be managed.

Water is over-allocated in the Heretaunga Plains and TANK proposed to protect our drinking water supplies for the community by establishing protection zones with some new rules for risky activities. TANK also looks to allocate water for urban development projections, within limits. Water supply and management plans will need to be developed and industry good practice targets for water infrastructure management and water use efficiency will need to be used if the growth areas are developed. Policy 50 states that NCC will work with HBRC to develop an integrated planning approach through HPUDS that gives effect to the National Policy Statements. Land use change will have to be managed to ensure water quality is not further degraded. Further information on the TANK plan change can be found here - <https://www.hbrc.govt.nz/hawkes-bay/projects/tank/>.

The Natural Features and Landscapes Discussion Document identifies the Taradale Hills as being a special amenity landscape. There does not appear to be consideration of this within the Growth in the Hills document. The suggested density may be compromised if building heights and landscaping are required to protect the landscape. This will need to be considered to ensure the council is providing enough land for residential growth.

We will provide you with further comments soon, and HBRC would welcome the opportunity to speak to you further about growth in these areas.

Yours sincerely



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