

Proposed Napier District Plan

Hearing Stream 2

December 2nd 2024

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Submission Points

210.1 – SUB-R5 - Cross Lease to Freehold Subdivision – stormwater assessment

201.2 – SUB-S12 – Transport, access – vehicle crossings

201.3 – SUB-S16 - Utility Services – electricity and telecom connections

210.6 – SUB – P9 – Provision of Infrastructure – electricity and telecom connections

201.8 – SUB- S1 – Definition of Allotment Size – agree with s42A report

210.10 – SUB-S1- Minimum allotment size – rural – agree with s42A report

210.11 – SUB-S1- Minimum allotment size – residential – 350m² vacant sites

210.12 – SUB-S8 – Building Platform – agree with s42A report

210.1 – SUB-R5 - Cross Lease to Freehold Subdivision – stormwater assessment

I agree with the s42A suggested changes to the applicable standards by deleting those not relevant. See Para 115 &116 on page 34.

However, I do not agree with the proposal to retain SUB-13 Stormwater.

On converting to freehold, there are no physical changes – pre- and post-development stormwater runoff is exactly the same. There is no development occurring. There should be no need to make an assessment of runoff, nor any requirement for attenuation in this particular situation.

201.2 – SUB-S12 – Transport, access – vehicle crossings

The s42A report at Para 191 p53 states deferral of vehicle crossings should be on a case-by-case basis. The issue here is that whenever we request deferral in a consent application, it is rejected as being “not to Code”. At 224(c) stage we then need to negotiate the deferral with the roading engineer - a very inefficient process. If the standard allowed consideration of deferral this could be established at resource consent stage.

Another issue with SUB-S12 (p50) is that it anticipates all allotments need vehicular access. We are completing urban subdivisions now with pedestrian access only, which is likely to become more common. This should be allowed for in the standard.

201.3 – SUB-S16 - Utility Services – electricity and telecom connections

210.6 – SUB – P9 – Provision of Infrastructure – electricity and telecom connections

The s42A report at Para 213 p58 uses wording “enables” electricity ...to be reticulated to each site. What does this mean?

Para 216 p58 SUB-S16 (2) Each allotment in a rural environment must “make provisions” for an electrical connection. What does this mean?

Para 228 p63 SUB-P9 (c) – For urban infill subdivision, can telecommunications be wireless? Why “reticulated” when there is existing reticulation in the road reserve.

Urban greenfield is different to urban infill – one requires new reticulation services and the other doesn't.

210.11 – SUB-S1- Minimum allotment size – residential – 350m² vacant sites

The s42A report at Para 252 p69 rejects the concept of Consent Notices for vacant sites which would prevent building development until land use consent is obtained. Coupled with minimum 350m² site sizes, this will preclude many infill subdivisions, since it is often the case that one of the sites is less than 350m².

Why does there need to be a 350m² minimum for the allotment containing the existing dwelling when this can be fully assessed at consent stage?

Staging of developments will be difficult as they always create vacant lots, and mandating a minimum 350m² appears arbitrary and unsupported, rather than allowing flexibility through a Consent Notice.

The standard as written does not support intensification objectives, and uses a “blunt instrument” to cover all scenarios.