
Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - Planning Unit

Date received: 15/12/2023

Submission Reference Number #:207

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Submitter:

Anna and Ben Sanders

Address for service:

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I wish to be heard: Yes

I am willing to present a joint case: Yes

Could you gain an advantage in trade competition in making this submission?

- No

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- Yes

Submission points

Point 207.1

Section: PREC4 - Jervoistown Precinct

Sub-section: Objectives

Provision:

PREC4-O2: Inappropriate subdivisions, use and development

Subdivision, use and development is restricted within the Jervoistown Precinct, and only occurs in accordance with the relevant structure plan in APP8(a).

Relates to PREC4-I1, PREC4-I2 , PREC4-I3 and PREC4-I4

Sentiment: Amend

Submission:

Note that this submission has a direct correlation to SETZ Settlement Zone.

The inclusion of Jervoistown as a Settlement Zone and a Precinct (PREC4) as an overlay is unnecessarily complicated. In preparing this submission, a check and comparison of the two, show duplication for almost all or certainly similarities which can be dealt under its proposed Settlement Zoning. Putting duplication to one side, the only reason the Precinct appears to of been included is to signal Jervoistown's potential suitability as a new urban development area, as explained in the [Rural topic summary document](#) *"The rural precinct of Jervoistown is identified as a potential new development area, and the form it takes is dependent on a clear consensus from the community"*.

This is understood to have been based on a previous Plan Change 7 agreement in 2013 which is now 10 years old. The details of this agreement are not included in what is proposed but is included to an extent in the current Operative Plan. As part of the preparation of this Proposed Plan no recent discussions have occurred with residents and given that District Plans among other things should reflect forward looking aspirations of its community, this should have occurred in targeted stakeholder, affected party and engagement phases and not through a proposed District Plan submissions process. If you are signalling potential suitability for greater or more residential intensification (Urban Growth) then this should more appropriately occur through the Future Development Strategy, so a complete and current assessment can be carried out of both this area and any surrounding areas considered and effects appropriately managed.

Under the National Planning Standards template, Precincts are to be used where you are attempting to achieve particular outcomes on a smaller scale, for example (which is intimated here) enabling development. However, the proposed Plan is not enabling more intensive residential development by way of the proposed plan provisions, it is simply signalling it, with no subdivision standards included should the key identified infrastructure occur. If the infrastructure is to occur you would need development agreements with multiple landowners, and then a plan change would need to follow to introduce an effect's based subdivision minimum. I submit that all of which is sought to be achieved can be done more simply and if the Precinct remains, needs to be undertaken in meaningful engagement with current property owners.

For your awareness, as a property owner in Jervoistown we did not receive initial notification of the Proposed Plan on September 21 which we should of, rather a letter some days later (no date included, which implied we had been directly notified) regarding a Major Hazard Risk Management Overlay in Ahuriri.

Relief sought

Amendments to the Settlement Zone (SETZ) and Jervoistown Precinct (PREC4)

Point 207.2

Section: SETZ - Settlement zone

Sub-section: Policies

Provision:

SETZ-P6: Cumulative effects

Ensure that the cumulative adverse effects of subdivision, use, and development of land do not deplete the versatility and productive capacity of the soil resource, natural resources, or the ability of infrastructure to perform efficiently.

Relates to SETZ-01, SETZ-02, SETZ-03, SETZ-04, and SETZ-05

Sentiment: Oppose

Submission:

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