

# Submission for the National Policy Statement for Highly Productive Land

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## Saving our Heretaunga Plains

The area of the Heretaunga Plains covers approximately 30,000 ha.

The Plains were formed over the last 250,000 years from sediment deposited by the Tutaekuri, Ngaruroro and Tukituki Rivers and from coastal marine deposits. It consists of layers of gravel, sand and silt. Permeable gravel beds form aquifers and the artesian groundwater provides 85% of the requirements for public water supply, irrigation and industrial use on the Heretaunga Plains and adjacent areas.

The fertile soil, the warm, dry climate of the area, and the water for irrigation make the plain an exceptional geographic location for horticulture, viticulture and agriculture. Half of the total New Zealand production of fruit, vegetables and grapes is produced from the soils of the Heretaunga Plains. It is one of New Zealand's leading [wine](#) producing areas.

For too long now, successive councils (Hastings District Council (HDC), Napier City Council (NCC) and the Hawkes Bay Regional Council (HBRC)) have encouraged and supported unsustainable growth of urban developments across the Heretaunga Plains, little by little creeping over the precious fertile soils that feed us locally, nationally and internationally, locking away forever these soils from any chance of producing food for export, for our children, for our grandchildren and generations to come. This urban concrete creep is also having a disastrous effect on the aquifer that everyone agrees is the basis of our future sustainability.

We have a document called Heretaunga Plains Urban Development Strategy (HPUDS) which is the result of a collaborative approach by the Hastings District Council, Napier City Council and Hawke's Bay Regional Council towards managing urban growth on the Plains from 2015 to 2045. The joint Strategy was first adopted in 2010, then a reviewed version re-adopted by the three councils in early 2017. The next review of HPUDS is due 2021/2022.

HPUDS sets a relatively strategic plan to predict population growth as well as to target growth areas for development for the next five years for urban and industrial expansion.

In the last 2017 HPUDS document, 800 ha (2,000 acres) was identified for expansion of urban development over the Heretaunga Plains, all planned on fertile soils.

And since around 1960, approximately 3,400 hectares of land has been taken for urban development. This area **does not** include lifestyle blocks which also become unproductive and non producing!

Attached to and supporting this submission are some rather crudely produced numbers that give an overview of the expansion of urban growth on the Heretaunga Plains. To obtain more accurate datasets and historic aerial imagery that may have helped generate greater accuracy in the numbers, was well out of our expertise and capabilities, however for the purposes of the figures, it should go without saying these are approximate only.

However, despite this, these images produce bold assumptions and approximations as to what was pre/post WW2. This was particularly the case at Bay View and Taradale.

C.1940s aerial imagery for those places was challenging to source, so we have simply amalgamated all of what might've been 1940s Taradale and Bay View into Napier's post WW2 figures.

Also attached are a few other images:

1. PowerPoint file that can be used in full slide view /presentation mode to see animated 'swipe' from c.1940/50s era to 2018 imagery. No historic images were available for Napier & surrounds.
2. Screenshots to illustrate approximate areas tagged as pre/post WW2 era. (green approx. pre-WW2 and purple approx. post-WW2)
3. PDF of 2 maps generated using some patchy datasets we sourced from Hastings District Council re 'age' of zone expansions around Hastings' periphery and building consent 'ages' around Havelock North.

One can see clearly how urban sprawl has gradually crept over the Heretaunga Plains in the last almost 100 years and as we move forward in time, to cater for our ever increasing population, the pace of this urban sprawl, unless terminated, will gather pace at an unprecedented and alarming pace covering even more of our fertile soils at a faster rate year on year.

We consider what has happened in the past is a derigation of duty by our elected Councils who have paid scant regard to our sustainability and the plight of future generations and as a result have been responsible for this permanent blight on our landscape. It is NOT too late to rein in on this reckless policy of sacrificing the one scarce commodity that is no longer made and that is our fertile soils.

The two councils have a view that as all the infrastructure is already in place, the easy option is to just tag new developments onto existing roads, water, sewage, waste water systems and power supplies that already exist on the Plains.

Two people within council; one a senior councilor, the other a senior planner, have admitted to the writer that the HDC agenda is to continue urban creep across the Plains because all the infrastructure is in place. In other words, it's the easier option and it's cheaper...!!

We consider this attitude to be very short sighted and the actions of a negligent and irresponsible authority.

Included in the 2017 HPUDS document, the following areas have been designated for future urban and industrial development:

1. The new designated areas for Residential Growth areas in Napier take up 277 ha of land. Apart from 43 ha on the "Western Hills", all the rest is on the "Plains" which includes approximately 100 ha in the Te Awa area.
2. In the Hastings area (HDC boundaries), there's 367 ha designated for Residential Growth...!! 257 ha is on the "Plains"...!! Areas off the Plains, such as Haumoana / Te Awanga (East Rd), Maraekakaho Settlement, Middle Rd / Iona Rd and Waimarama, take up the remaining 110 ha.
3. What is termed Residential Reserve areas such as South Pirimai (Napier), and in the Hastings District, Arataki Extension, Middle Rd (in part) which is each side of Te Aute Rd from the Karamu Stream over to Middle Rd, Murdock Rd / Railway Rd South and Wall Rd (in part) are all areas for possible new future residential development on the "Plains". The total area of these areas is approximately 150 ha.
4. The designated Industrial / Business areas are: the Awatoto Growth Area, Napier Business Park, Irongate Industrial, Omahu Industrial, Tomoana Industrial and Whakatu Industrial which in total cover another 110 ha (maybe more). Over and above this, there seems to be another 225 ha required for industrial and business expansion by 2045...!!
5. So in summary:
  1. 534 ha is already earmarked for residential growth in the Napier and Hastings areas... all on the "Plains".
  2. Another 150 ha for possible new residential growth over and above the above.
  3. Then there's a further 110 ha already planned for industrial / business development.
  4. That's a total of 800 ha of our Heretaunga Plains gone...!! Gone forever...!!

This writer has just completed a subdivision on poor unproductive land on the hills near Havelock North and all the infrastructure (roads, water, sewage, waste water systems, power supplies and fast internet broadband fibre optic system) had to be created from scratch with NO connections with existing services and NO financial input from the HDC. Then when title was issued, "Development Levies" were charged to the developer, being the writer of this submission.

Development contributions fund upgraded or new infrastructure which is a result of growth identified in Council's Long Term Plan 2018-28.

These Development Contributions are used to part fund such activities that include the roading infrastructure in the district, water supplies, waste water, storm water disposal, playgrounds, toilets, libraries, parks and reserves, etc.

In the writer's case, as the developer, the council had no financial input into the roading infrastructure, water supplies and waste water or storm water supplies, yet was forced to pay a contribution, in the form of Development Contributions, towards implementing these services.

To incentivize developers to create housing away from the already existing infrastructure, there should be leniency towards paying these "Development Contributions" to councils, and instead of and in place of, gathering revenue from these areas through the rating system. In other words, charge the property owners, as it is the property owners that are using these activities, not the developer.

The writer makes these points for no other reason other than to explain the impossible and often financially crippling demands that are made upon enterprising developers who dare to attempt to take their project outside Councils comfort zone on the Heretaunga Plains. HDC, NCC and HBRC need to embrace and support enterprising development that is not taking place on “stolen” high yielding agricultural land.

So what are the writers’ suggestions to move urban development off the fertile soils of the Heretaunga Plains?

We believe the way forward is:

1. Build up instead of out.
2. Be creative and develop subdivisions on unproductive soils instead of fertile soils.
3. Create new and exciting satellite subdivisions that will turn into villages and eventually towns on unproductive land surrounding our two main cities.
4. Make it easier to get resource consent to develop subdivisions on unproductive land on and off the Heretaunga Plains. This includes our systems and rules that make it difficult to change existing zoned areas. We have a case at the moment where a collective of property owners on Raymond Road want to change the zoning of their land. It’s zoned “Plains Zone” and the HDC believe it’s on Class 1 and 2 soils. However, it has been proven to be Class 3 and 4 (unproductive) so the HDC’s answer to this is for the property owners to do “mounding”. “Mounding” is where the top soil is mounded up into rows for planting; a system unproven and expensive. This case has just been through the Environmental Court and a decision is pending. A costly exercise for the applicants as well as the Hastings District ratepayers.
5. Incentivize developers in creative ways (such as scrap the Development Levies) to create these much needed areas to house people. (It is a known fact that 50% of developers that get involved with creating subdivisions go into receivership. I ask the question? Is this an incentive to be bold and brave to become a developer? Why would one risk so much to do this?)

The HDC and (NCC) are very inconsistent in some of their decision making.

1. The HDC granted resource consent for a subdivision on East Road, very near the area where the sea is eroding into an urban area; probably the worst case of sea erosion on a coastal community in NZ. To make matters worse, this subdivision has been created on a swamp area which was below sea level!
2. The NCC has also giving resource consent for a large infill development called Te Awa that is also below sea level. They have installed large pumps to discharge water from this area out to the sea. The longevity and survival of this area is totally dependent on these pumps functioning at all times.
3. Are these good sound decisions in light of Climate Change and impending rising sea levels? We suggest they are not.
4. The Te Awanga and Haumoana areas are exactly in the correct areas to encourage development, so why is the HDC attempting to block urban housing on unproductive soils on Raymond Road when they have just given consent to a housing development called Matinga further up the road?

There are lots of areas within and surrounding the Heretaunga Plains that have poor unproductive soils that can be exploited for urban living.

1. Te Awanga and Haumoana are areas already mentioned. People like living in these coastal areas. The Te Awanga Downs Residential Subdivision Development has been given resource consent for 83 sections with an average size of 800 sq.m.
2. Maraekakaho has begun a satellite area for housing which is proving to be very successful and popular with property owners.
3. The hills surrounding the Heretaunga Plains are completely unproductive. They are very dry in the summer months and have very poor soils even by agricultural grazing standards. This vast area should be encouraged to be urbanized as is already proven by the popular Havelock North "village" area, the Enfield development at the southern end near Paki Paki, some parts of Fernhill, the Taradale hills and Poraiti.
4. The Middle Rd / Iona Rd area has almost got resource consent for approximately 400 dwellings. This is a good thing as it's off the Plains but the local infrastructure within Havelock North will need thought and investment to cope with the increased population in the area. Thought also needs to be given to a much needed extra school for Havelock North. This plus a shopping area to be planned for and developed near this subdivision south of Havelock North.
5. The Tuki Tuki area is becoming popular with many existing subdivisions, lifestyle blocks and small land titles for housing.
6. Waimarama is also a very popular coastal community that is restricted for expansion by zoning issues on the surrounding hills.

#### In Summary:

We support the new National Policy Statement for Highly Productive Land to save our fertile soils throughout all New Zealand. These areas are limited in size and can not be replaced once taken by urban development.

The Heretaunga Plains comprise some of the best and most fertile land in the world. It is with horror and despair that one can see from the 1960's through to present day, what appears to have been a somewhat undisciplined and piecemeal urban sprawl on the Plains.

This is even continuing to occur under the present HPUDS document at an alarming rate.

We cannot continue to be influenced by existing infrastructure which invariably leads to taking the easy options for future developments.

As a group, we have identified alternative areas for development around Havelock North, out towards Te Awanga and other areas where it is only logical to concentrate future housing developments.

Some tough and enduring protection needs to become THE MAJOR part of any future HPUDS documents.

Central Government needs to give direct and clear direction to Local Government entities to establish regulations that draw “a line in the sand” giving the strongest message that “enough is enough”. The time is right NOW; we have no choice but to “save our fertile soils”.

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