

**SUBMITTER #21**  
**THE ROTORUA DISTRICT COUNCIL**  
**PROPOSED PLAN CHANGE 2 (PC2) – PUKEHANGI HEIGHTS**

- 1.1 My name is Linden Hunt and with my wife Robyn, we are the owners and occupiers of Utuhina Valley Farm. ( Lot 1 DPS 13271 and Lots 6 and 7 DPS 34112) Utuhina Valley Farm is located at 134 Great West Road, which is located on the southern boundary of two of the subject properties involved in PC2
- 1.2 We have owned the property since the 1990's and before that my parents owned and farmed the land. The property was originally part of the larger family land holding, owned by my grandparents Neil and Emma Hunt.
- 1.3 Utuhina Valley Farm is also the lessee of the Te Arawa Group Holdings (TAGH) land which is the subject of this application.
- 1.4 Therefore, Utuhina Valley Farm are an affected party (neighbour), landowner, lessee, and ratepayer to the Rotorua District.
- 1.5 Due to our properties location within the Rotorua caldera and being on the urban fringe, we have historically contributed to Council's planning process in various capacities including the Plan Change for the establishment of Pukehangi Parklands, the District Plan Review, the Western Structure Plan process, Long Term Community Council Plan, Development Contributions Policy, and now PC2.
- 1.6 We submitted on eight matters to PC2 and on behalf of Utuhina Valley Farm I appreciate the opportunity to discuss our concerns. I will also discuss matters that have arisen during our reading of all the submitted evidence.

**2.0: DEMAND FOR RESIDENTIAL LAND**

- 2.1 We understand that additional housing is required in the Rotorua District. However, we note that PC2 does not propose to provide a variety of housing typologies, based on the current need within the community. It is considered that Rotorua has low growth compared to other main centres including Tauranga, Hamilton and therefore the need for this additional rezoning is not clearly demonstrated. The Wharenui Bock has already been zoned for residential development within the District Plan.

- 2.2 The document indicates that additional demand is required, however re-zoning of the land will not necessarily result in vacant sites as development is determined by economic factors and the residential market. It is noted that the land has been zoned for Future Development and this has not occurred due to stormwater disposal management issues. The District Plan currently has staging mechanisms for this zone to ensure that the development occurs in a systematic manner. The staging mechanisms have been removed from PC2, however it is noted that the TAGH land is significantly affected by the development of adjoining land first.
- 2.3 Should the development of the PC2 be undertaken then it appears that the staging and timing of the development is critical for key infrastructure. For example, the staging of the development is not adequately defined, is unknown, and restricts development of TAGH land until the Hunt land is developed.
- 2.4 The caldera rim landscape is noted as being highly valued by the Rotorua community therefore if residential demand is required then it should not be located on the caldera rim. It is suggested that the development is provided in areas of the District where the caldera rim is not prominent such as Eastside or Ngongotaha. No development should be provided on the caldera rim.

### 3.0: LANDSCAPE

- 3.1 The Boffa Miskell report (March 2019) for PC2 clearly states that there will be substantial landscape and visual change with the proposed change of land use.

*"Although the proposal does present a defined transition from a pastoral outlook, to one of a more developed nature, this is consistent with existing development patterns".*

- i) *To allow continued development consistent with previous developments will dramatically change the current rural outlook. To adopt the position that what was previously acceptable is not necessarily applicable or acceptable for the future.*
- ii) *Pukehangi Southern slopes should be retained as either farm land or retired with appropriate native plantings. Production exotic forestry would not be appropriate due to contour and proximity to the Utuhina Stream.*

iii) *The existing built up nature of Matipo Avenue would allow the Mid- site Escarpment and Escarpment Transition area 2 of TAGH land to be treated as Residential 1 without lowering any visual amenity effect."*

3.2 It is considered that any high / medium density residential development should be confined to the areas shown on the PC2 map as Residential 1. To retain the current open spaces and rural aspect, Rural 2 areas should either be left undeveloped / or planted consistent with the adjacent Parklands planting or the Lot sizes increased significantly from what is proposed, with the exception of iii) above.

3.3 In May 2008 I submitted to the RDC Western Structure Plan process. My submission stated that:

*"No recommendations have been suggested as to what or if any development should take place to the west of Pukehangī Road on the current farm land. A mention has been made of the so called Urban Fence which has already been breached by the recent Rural B1 zone development (Pukehangī Parklands).*

*The community, not the Rotorua District Council or its consultants, need to decide whether they want a rural / forestry backdrop to the city or a continuous line of housing."*

3.4 Furthermore, in my feedback to the Draft District Plan in July 2011, I noted that:

*"The current District plan provides an 'Urban Fence' around the city determining where it has been considered appropriate for development. The Draft District Plan indicates that the Urban Fence has been replaced with a 385<sup>o</sup> contour. This contour is not shown on the planning maps and its determination is unclear. Has this contour been determined by topography, landscape values, or infrastructure. It is also unclear how much additional growth beyond the urban fence is provided by this change. Additional information is required before a true assessment can be provided."*

3.5 The 'Urban Fence' was provided in the previous District Plan and provided a ring around the city urban limit. The boundary was along Pukehangī Road to ensure that the southern caldera rim and farmland extent would be retained. The 'Urban Fence' has been arbitrarily replaced by the 385<sup>o</sup> contour line instead.

3.6 I am disappointed that development beyond the 'Urban Fence' and within the caldera rim is being proposed again, and that I have submitted before on this matter.

3.7 I consider that this fundamental issue has not been resolved, and furthermore this Plan Change does not address what the greater community wants to see on the caldera rim and beyond the 'Urban Fence'.

#### **4.0: ECOLOGICAL**

4.1 I consider that any retirement planting should be consistent with the Pukehangi Parklands Development, although as to be further discussed, Utuhina Valley Farm would like to be consulted on any plantings adjacent to our boundary to ensure reverse sensitivity issues can be addressed.

#### **5.0: THREE WATERS**

##### Wastewater:

5.1 I understand that the existing RDC wastewater treatment plant cannot sustain the proposed number additional dwellings. Furthermore, I understand that if reticulation cannot be achieved to the Rural 2 zones proposed then a minimum of 8,000m<sup>2</sup> will be required for on-site systems to be provided.

5.2 I consider that the proposed Plan Change should not be contemplated until the RDC Wastewater Treatment Plant can accommodate the additional load. Furthermore, I do not consider that mass on-site individual treatment systems or plants are suitable for this location.

5.3 I support the evidence of Joanne Watts of BOPRC that the nutrient issues have not been adequately addressed. It is understood that some of the subject land does not have the capacity for the proposed development.

Storm-water:

- 5.4 I have perused the storm-water submissions and storm-water expert opinions and consider that there does not seem to be a consensus of opinion and therefore I consider that until everyone agrees, the storm-water issues have not been resolved.
- 5.5 This concerns me as I consider this is a fundamental issue and should be addressed before the Plan Change and resulting developments can proceed. The deferment of the storm-water management to time of development is not suitable. The overall catchment management plan and site storm-water management plans should have been prepared prior to PC2 notification as the proposed land use change (changing from rural to residential) is known.
- 5.6 There is no point re-zoning the land if the disposal of storm-water cannot be undertaken and the assessment has not been resolved. It is not appropriate to approve this zone change in principle subject to storm-water as the downstream effects cannot be determined accurately. The potential nutrients entering the lake has not been addressed.

Water:

- 5.7 The supply of water has not been determined and should be finalised prior to development. The effects of additional aquifer drawdown has not been identified.
- 5.8 I consider that the supply and management of water is undertaken prior to PC2 approval. It is not appropriate to approve this zone change in principle subject to water as the effects on the aquifers have not been determined.
- 5.9 The location of any proposed water reservoir within the caldera rim needs to be identified now as this is potentially a significant visual 'eye-sore'. We are opposed to any reservoir placement being located adjacent to our property or located on the caldera rim.
- 5.10 In summary, it would be prudent to have the waste-water, storm-water and water issues, including downstream nutrient and storm-water effects identified and resolved prior to any Plan Change approval.

## 6.0: TRANSPORTATION

### Great West Road:

- 6.1 The use of Great West Road to serve the TAGH development is opposed. Great West Road adjacent and beyond the TAGH land is a single lane metalled road maintained by the landowners (currently me!), and **not Council**.
- 6.2 Use of this road for construction traffic and /or walkers will result in significant safety issues as there are blind corners, rural stock movements, rural stock trucks, rural contractors and forestry vehicles utilising the road.
- 6.3 I understand that reading the traffic evidence that Matipo Avenue can support any proposed development and therefore the use of Great West Road is not proposed. I support this comment.
- 6.4 However, we note that the revised structure plan map continues to show a walkway and cycleway along Great West Road. Therefore, we seek that there is a permanent removal of the proposed walkway and cycleway along Great West Road.

## 7.0: REVERSE SENSITIVITY

- 7.1 Utuhina Valley Farm operates a legitimate rural farming operation. Any proposed development cannot have any limiting effects on our current farming operation.
- 7.2 It is not considered that the provisions of PC2 adequately address the potential for visual amenity, noise and odour to be addressed.
- 7.3 We have suggested as a minimum that a reverse sensitivity / no complaints covenant is imposed on the subject land adjoining our property. However, I understand that if there was any land use change no mechanism could be imposed. Therefore, we request that Council provides additional mitigation avenues for us to consider. Furthermore, we would like to have input prior to any legal mechanism being imposed.

- 7.4 In our submission we suggested that a permanent and immediate vegetative screen is established on the common boundary of our property and the subject land. I would like this to be established on the proposed TAGH Rural 2 zoned land.
- 7.5 Any proposed vegetation along our common boundary, including plant selection and buffer width should be determined by the developer, Council and Utuhina Valley Farm. We would like to be involved in the selection of plant species to ensure that shading of our farmland does not occur and our current view shafts of the lake and city are preserved.

#### **8.0: PUKEHANGI HEIGHTS STRUCTURE PLAN RULES**

- 8.1 If PC2 is granted then I would like to see commonality of the performance standards of the Pukehangi Parklands rules and the PC2 rules to ensure that plantings and setbacks occur. Furthermore, the minimum lot sizes should also be consistent, as PC2 proposes an *average* (rather than net) minimum lot size for Rural 2. In our submission we requested that removal of the *“reference to a “minimum average area of lots in the Mid Site Escarpment Area shall be 4,000m<sup>2</sup>.” Replace with “net average area of lots in the Mid Site Escarpment Area shall be 4,000m<sup>2</sup>.”*
- 8.2 There is no suitable buffer between proposed structures on the TAGH Rural 2 zoned land and our land. We do not accept that the proposed structure setback distances are adequate. In our submission we asked *“That the minimum setback from the Rural 1 zone is 10.0m for the Residential 1 and Rural 2 zone (including southern slopes).”*
- 8.3 In our submission we requested that a reflectivity requirement of 37% for all land within PC2 is proposed.

#### **9.0: OTHER MATTERS ARISEN**

##### Southern slopes of TAGH land

- 9.1 I currently farm the southern slopes of the TAGH land. This land has been farmed for many years and has recently been included within BOPRC Nutrient Management Plan as being suitable for farming.

9.2 Council's key water infrastructure traverses this land and therefore continued access of these water lines is important. Plantings of these areas are not suitable. Furthermore, plantings of the southern slopes will also provide significant shading to Great West Road which as noted previously is already compromised due to blind corners and its single lane access width.

## **10.0: SUMMARY**

10.1 In summary, I feel that this Plan Change process has been rushed. A lot of information should have been provided at time of notification and not at the time of the Hearing. The magnitude and importance of some of the significant community issues do not appear to have been adequately addressed such as:

- the future urban development of the caldera rim;
- infrastructure to serve the development; and
- the need for an extensive zone change.

10.2 Furthermore, I am not yet convinced that the rights of my legitimate farming operation will be protected through the PC2 provisions.

10.3 We would welcome the opportunity to take the Hearings Panel for a site visit along Great West Road; and the common boundary of our property to the land subject to the Plan Change, so that you can appreciate our concerns. We also extend this offer to Council staff who to date have not contacted us to discuss our submission further.

Linden Hunt on behalf of Utuhina Valley Farm

23 September 2020