

Draft proposal for the Rural and Residential Chapters Review

Plan Change 50 of the Upper Hutt District Plan

Feedback from The Guildford Timber Company Ltd.

Monday 13 September 2021.

1 Introduction

The Guildford Timber Company (GTC) is grateful for the opportunity to provide feedback to the Upper Hutt City Council (Council) on its draft proposal for Plan Change 50 (PC 50).

PC 50 is a critical piece of work and GTC wishes to acknowledge the staff and Council for their hard work over the last couple of years on getting to this point.

Upper Hutt, like other cities, is facing unprecedented growth. This is evidenced by the results of the review of the Housing and Business Capacity Assessment (HBA), which Council has signaled will show that 10,000 homes will need to be built in the long term – not 5,600 as projected in 2019.

GTC owns Silverstream Forest – more than 300ha at the southern end of the city. This land has been identified as the 'Southern Growth Area' (SGA) in Upper Hutt; one of a number of strategic growth areas identified in the Council's Land Use Strategy and the Wellington Regional Growth Framework. GTC has completed a conceptual masterplan for Silverstream Forest, which at this stage shows the site could potentially provide up to 1600 homes. Silverstream Forest has the potential to make a significant contribution to Upper Hutt's future housing supply.

PC 50's urban objectives have a clear focus on the diversity of housing, sustainable urban design and climate resilience. GTC shares these objectives and they are reflected in the masterplan for Silverstream Forest.

GTC owns a number of other titles subject to the zone changes proposed by PC 50, and these are commented on separately in our feedback.

We have not taken the opportunity to explain the company's history to the area, as this has been covered in previous submissions to the Council and explained in detail on our website at www.silverstreamforest.nz

2 Silverstream Forest / the Southern Growth Area

As explained in the PC 50 FAQs, “PC 50 is not proposing to rezone the Silverstream Spur or the Southern Growth Area” for the reason stated that “There has not been sufficient supporting information provided by the landowners to consider these growth areas through PC 50”. The FAQs then state that “Therefore the Southern Growth Area and Silverstream Spur is proposed to be considered through a separate Council-initiated plan change process once sufficient information has been made available to support the plan change”.

While GTC appreciates Council’s intention to initiate a separate plan change when it has sufficient information to do so, GTC believes that expressly excluding the SGA from PC 50 is a poor outcome for several reasons.

The review of the HBA shows that projected growth is far higher than predicted in the 2019 assessment and the city now needs to provide for 10,000 homes in the long-term, rather than 5,600. We would value seeing more information about the assumptions Council is making regarding the uptake of high-density development to provide for this growth in the long-term. While we support higher density infill development in principle, we are conscious that both infill and greenfield development will be needed in order to bring on the number of homes at the required rates over the next 30 years.

GTC does not consider that insufficient supporting information provided by GTC be a reason to exclude the Southern Growth Area from inclusion in the plan change. Gillespies Road is identified as a proposed Future Urban Zone, and under the proposed provisions residential development cannot occur there until:

- Roading design provides multiple connections to the Gillespies Block
- There is the ability to service the site by three waters infrastructure
- A comprehensive structure plan has been developed; and
- The area has been rezoned

There are further requirements including reducing greenhouse gas emissions, integrating public and active transport options, maximizing density to make efficient use of land, and on-site measures be put in place to reduce dependency on network utility infrastructure.

GTC does not see why the same approach isn’t being adopted for the Southern Growth Area?

GTC appreciates the response that officers have provided about ‘legalistic’ reasons why Council is not proposing to include the SGA in the scope of PC 50 or zone the SGA ‘Future Urban’.

These included:

- That the scale of PC 50 means it is likely to take some time to complete, meaning there is a chance that legal effect of an SGA plan change could happen prior to PC obtaining legal effect, despite PC 50 being notified earlier.

- If PC 50 were to propose Future Urban zoning, it would mean that this zoning would overwrite the outcomes of the SGA plan change, making it null and void.
- Alternatively, if Future Urban were to be proposed, and a submission(s) were to be made to enable the SGA, this could force PC 50 to be re-notified through a variation process, further delaying PC 50 having legal effect.

However, GTC disagrees with the extent of those concerns and has already provided its reasoning for this to officers for consideration.

GTC's response was that:

- Regarding the scenario where the SGA is zoned 'Future Urban Zone' under PC 50 and a separate plan change for SGA is advanced in a slightly delayed timeframe, the RMA provides for the variation process to wash-up any overlap should that occur.
- Regarding the scenario where the SGA is zoned Future Urban Zone under PC 50 and GTC seek an urban zoning via submission, there is no impediment to this and it wouldn't dictate the need for a variation.
- The entirety of PC 50 that survives the submission process without appeal is effectively operative irrespective of how long it takes to resolve any appeals relating to the SGA or any other discrete aspect of PC 50.

Excluding the SGA from PC 50 is in conflict with the intent of the NPS-UD to take a comprehensive approach to providing for future growth, and amounts to a duplication in cost and process for two urban growth plan changes that should be advanced together. GTC doesn't consider this approach as good value for the community, neither in the context of Council's fiscal obligations under the LGA, nor in the context of s32 of the RMA.

GTC also notes that recently Council submitted an Expression of Interest for an infrastructure corridor that will support growth at Silverstream Forest, to the Government's Infrastructure Acceleration Fund. Excluding the SGA from PC 50 seems incongruous with that decision, as the ability to describe a structured and imminent planning process will be essential to the viability of the IAF application.

GTC requests that the Southern Growth Area either be identified as a Future Urban Zone or live-zoned for residential, community and small-scale commercial activities with appropriate rules in place around subdivision, land use and development.

3 44 Kiln St (Lot 1 DP 85787)

GTC owns approximately 3ha of land at 44 Kiln St. This has been identified for re-zoning in the draft proposal to 'High Density Residential'. Overall, GTC is supportive of this zoning as the site has potential to make a significant contribution to the residential housing market in close proximity to the Silverstream shops and its public transport node. The site may lend itself to partial commercial use alongside residential, and GTC supports the objectives and policies set out in the draft proposal to provide for this. Namely:

UFD-P18 – Consideration of non-residential activities.

HRZ – 03 – Ancillary and mixed-use development.

HRZ – P4 – Provide for ancillary services.

GTC is however, concerned with the intent of SUB-RES-P6 'Efficient development threshold' to *require* minimum densities on sites able to deliver scale intensification. It is GTC's view that requiring a minimum of 50 dwellings per ha should only be applied where there is clear and compelling evidence to support this – which should include a local market assessment of the commercial feasibility of building to that density. GTC would find it useful to see the evidential basis for this particular policy. The adjacent Amberley Gardens development is a comparable site to 44 Kiln Street. Its finished density is closer to 20 dwellings per hectare, which represents some of the highest density housing in Upper Hutt. GTC is not aware of any development approaching a density near 50 dwellings per hectare in Upper Hutt at present.

4 Other titles

GTC owns a number of other titles along Blue Mountains Rd, Avro Rd and Avian Crescent that are subject to proposed changes in zoning.

222-230 Blue Mountains Rd (Lots 265 - 269 DP 9629) are proposed to change from 'Rural Hill Blue Mt' to 'Rural Lifestyle'. Properties adjacent to these titles along Avro Rd have instead proposed zoning changes from 'Rural Hill Blue Mt' to 'Settlement Zone' (refer to maps 1 and 2 for proposed and current zone extents).

GTC requests that Council considers applying the Settlement Zone to, at least, all titles currently identified as 'Rural Hill Blue Mt' in the current District Plan. GTC also requests that Council consider applying the 'Settlement Zone' along the eastern extent of Blue Mountains Rd which has been proposed as 'Rural Lifestyle'. A key purpose of the Settlement Zone is that it is a transition zone between urban and rural areas and is in close proximity to the urban perimeter. GTC's view is that this zoning aligns more closely with the qualities of the Blue Mountains area than the 'Rural Lifestyle' zone, which seeks to achieve more open rural amenity.

GTC also notes that the layout of titles along Blue Mountains Rd will not lend themselves to achieving either the 100m or 150m minimum distance between accessways onto roads. Council should consider using metrics that are achievable and at least provide for access separations to reflect the distances 'on the ground' currently in these zones. Similarly, to facilitate logical development Council should incentivize boundary adjustments to enable:

- a more logical layout of allotments
- a more sensitive finished development pattern and / or
- the opportunity to rationalize multiple existing accesses into fewer access points to enhance the safe, efficient function of the road network.

5 Summary

GTC wishes to thank the Council and staff again for the opportunity to provide feedback on PC 50. The company appreciates the approach Council has taken by engaging the community consistently through the development of the plan change.

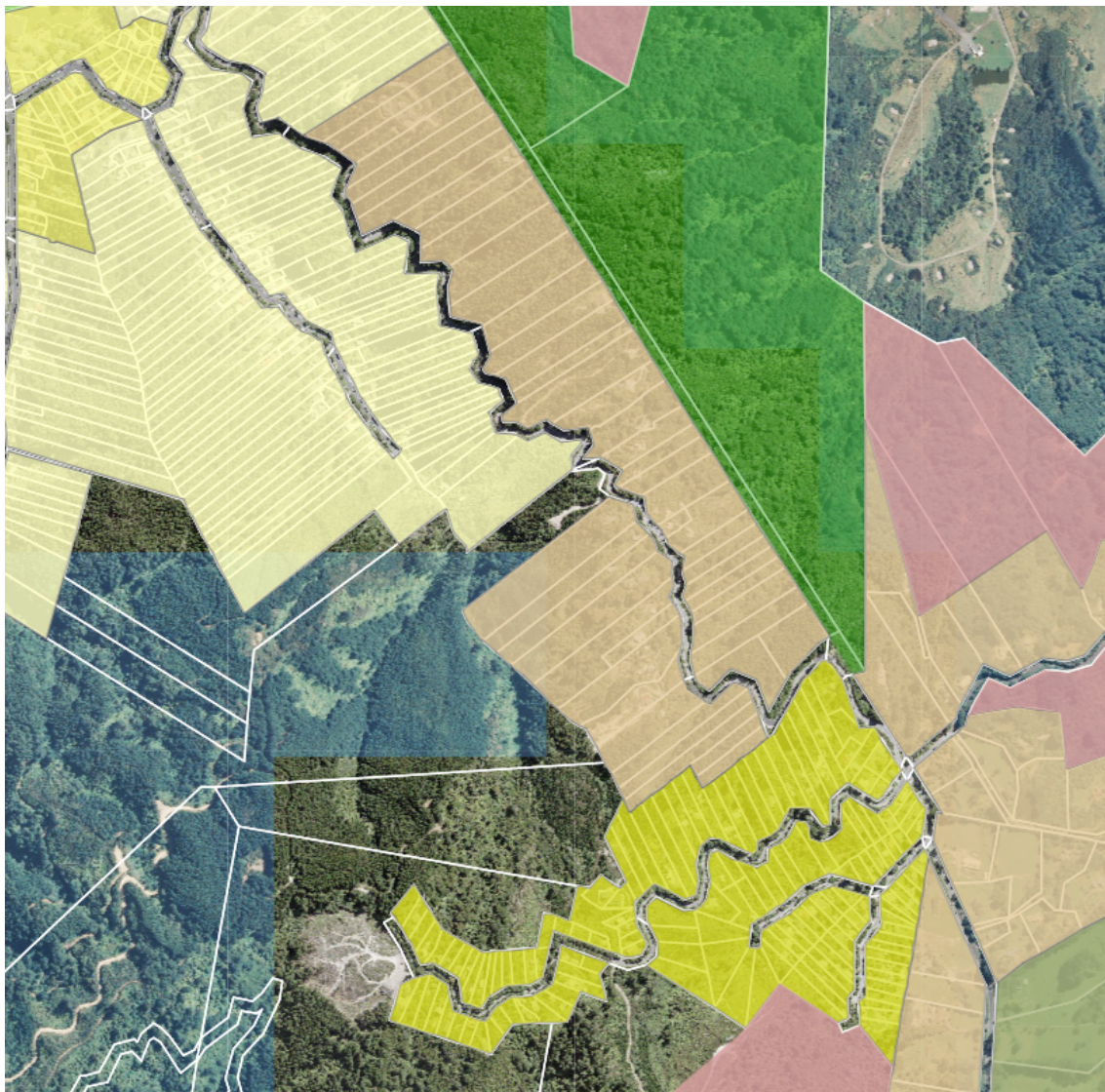
PC 50 is Council's opportunity to take a comprehensive approach to the long-term future growth of Upper Hutt. GTC considers the exclusion of one of the city's major identified future growth areas to be at odds with this approach and is seeking Council's reconsideration of the Southern Growth Area's exclusion from PC 50.

GTC would welcome the opportunity to further discuss the views presented in its feedback.

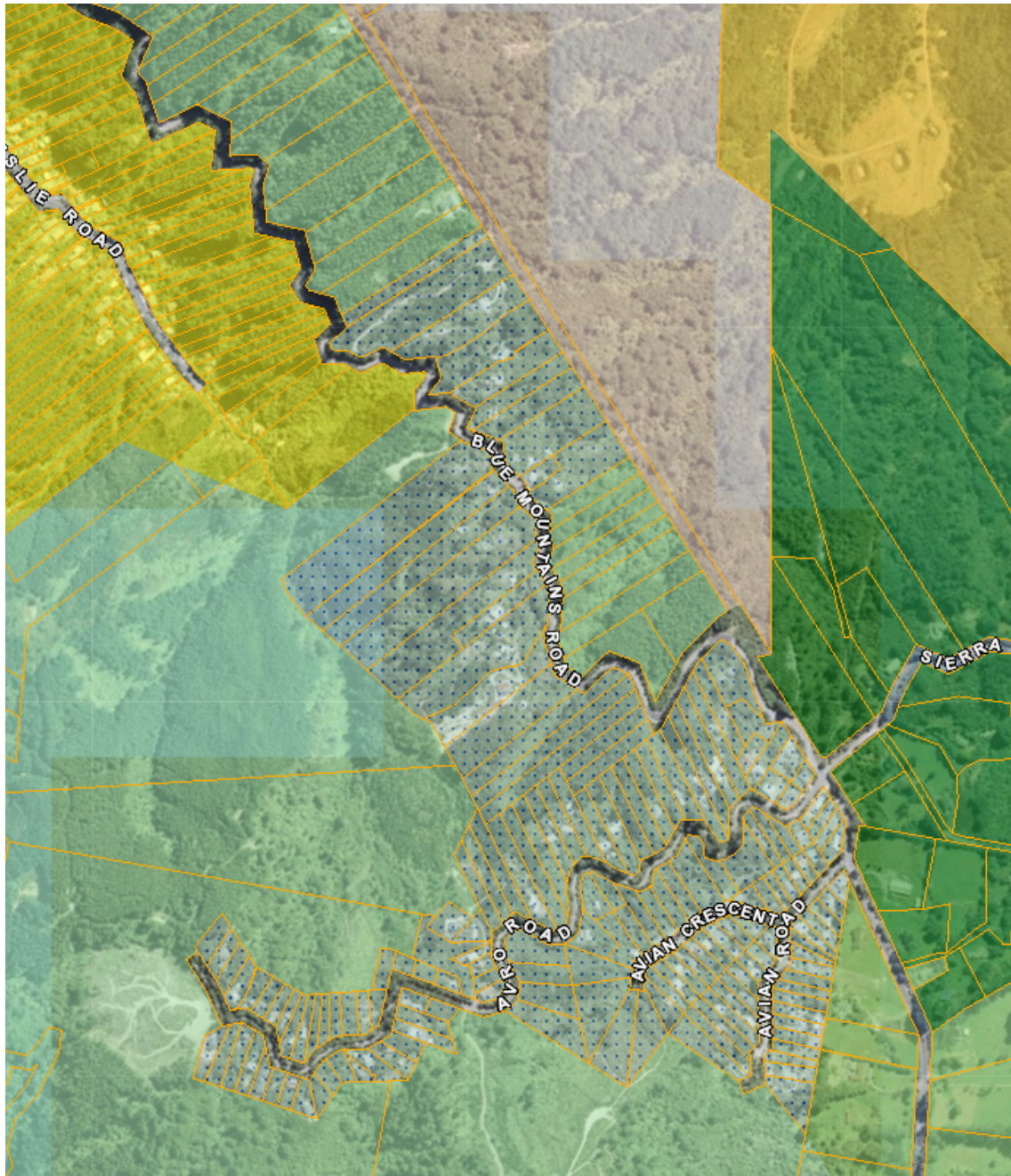
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Map 1: Draft proposed zoning – Blue Mountains Rd



Map 2: Current District Plan zoning – Blue Mountains Rd