

Fairclough /de Raadt
2401 Akatarawa Road
Upper Hutt 5372

17 November 2023

Upper Hutt City Council
838 – 842 Fergusson Drive
Upper Hutt 5018

Email: planning@uhcc.govt.nz

**Re: UHCC Plan Change 50 – Rural Review
Submission from Roger Fairclough and Anna de Raadt**

Thank you for the opportunity to provide feedback on the following:

- Plan Change 50 – Rural Review October 2023

This Submission

Please note that the submission matters below are oriented towards the **GRUZ-General Rural Zone** provisions, but many also apply to other rural zones in this document.

Number	Reference	Comments
1	Page 3, “Building NPS”	Given the functionality of caravans, they should also be excluded in this definition.
2	Page 4, “Conference facilities”	The current definition could include a private family meeting. The defining element is the commercial nature of these activities. Suggest the insertion of “commercial” in appropriate places.
3	Page 14, “Minor structures”	The current text is thoroughly confusing and unclear. This must be revised and consulted upon again.

4	Page 30, TP-S9	<p>Object as it stands.</p> <p>There must be specific exclusions to the vehicle movement limitations stated in this section. For example, construction activities, commercial activities (forestry, infrastructure provision) and, most importantly, Staglands with its associated economic benefits to the region, should all be activities excluded from TP-S9.</p>
5	Pages 33 to 42	Diagram titles are orphaned – need to change format.
6	Page 45, SUB-RUR-P5	<p>- typo, “stormwaterand”</p> <p>- The last section “provides sufficient water supply for firefighting purposes” – should be deleted (see the relevant point below, Number 10)</p>
7	Page 73, GRUZ – General Rural Zone, Background	<p>Object as it stands. Reinstate former definition.</p> <p>Because the suggested definition <u>immediately</u> focusses on primary production, there is now a risk that “other activities that require a rural location” are not fully recognising the range and value of the activities deleted from the former / current version. These (the deleted section) must be reinstated.</p>
8	Page 78, GRUZ-P9	Staglands is of, at least, regional economic benefit. Wording needs to be changed from “Recognise local economic benefits....” to “Recognise <u>regional</u> economic benefits...”.
9	Page 83, GRUZ-S2	<p>Object.</p> <p>The new drafting could effectively sterilise any new building in forested land, e.g. you cannot place a building within a forest as you cannot build 10m away from the forest.</p> <p>It is presumed that the intent is to have adequate clear space around buildings for the purpose of wildfire protection.</p> <ul style="list-style-type: none"> • this distance of 10m is best given as a guideline rather than a “hard boundary” as it may not be possible to achieve this distance; and • have it the other way around, i.e. as a guideline, when a building is being built, it is recommended that there is a clear space of 10m to any forest. This could be managed by means of existing resource consent processes.

10	Page 86, GRUZ-S14	<p>This feedback also applies to RPROZ-S12 and RLZ-S11.</p> <p>We object outright to the compulsion for sprinklers and associated firefighting water supplies.</p> <p>Refer submission from George Hare, 1975 Akatarawa Road for details (duplicated below):</p> <p>GRUZ-S14, RPROZ-S12 and RLZ-S11 will require each residential unit not connected to the council's reticulated water supply to have a potable water supply of at least 38,000L. I currently have a 15,000L tank that has never run out in the time I have owned the property, nor in the memory of the previous owner. I would be required to add a further 25,000L tank, at a cost of \$3-4k plus delivery and installation. An enquiry to a local supplier suggests that 13,000L of fresh water delivered costs me \$400 and at no cost to the council, so given I haven't required my tank to be filled currently in 7 years, the return on investment would take somewhere around 100 years to recoup.</p> <p>The same clauses also require an NZS 4541:2013 sprinkler system to be installed along with a PAS 4509:2008 compliant water supply. The current version NZS 4541 is 2020, not 2013. NZS 4541 is primarily a commercial fire sprinkler standard and does not contain a domestic hazard class.</p> <p>The only residential hazard classes identified are boarding houses, hospitals, hotels (residential portion), motels (residential portion), prisons, residential clubs and youth hostels. These are all classed as Extra Low Hazard (ELH). ELH requires a flow rate of 375L/min and sufficient stored water to supply the system for 60 minutes. This is an additional 22,500L of water required. PAS 4509 also requires a further 7,000L of firefighting water for domestic non-reticulated water supply, within 90m of the building, making a total additional fire fighting water supply of at least 29,500L.</p> <p>An NZS 4541 sprinkler system would also require separate tanks, pumps, valve gear, flow switches, etc. as well as bi-annual inspections. Maintenance can only be carried out by approved sprinkler installers and the system would have to be designed</p>
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		and installed by an approved sprinkler system installer and certified by the sprinkler system certifier. The cost of such a system is likely to run to many \$10,000's even for a new build where it could be installed during construction. A retrofit would cost \$10,000's more to replace ceiling linings and redecorate in order to run the pipework.
11	Page 87, GRUZ-S15	Item 2 is impossible to meet and therefore must be deleted. For Staglands to operate, they must bring external resources to site.
12	Page 87, GRUZ-R18	As previously mentioned, Staglands is an "economic asset" for the Upper Hutt district. Not only does it provide local employment, it attracts "out of towners" to the area who can also visit other local attractions and raise the appeal of Upper Hutt. This section will tend to constrain the value generation of Staglands by means of the traffic management demands. In general, the continued organic growth of Staglands should be enabled not constrained because: - the magnitude of economic benefits will increase - any improvements to roading will also improve a "east-west" strategic route (Upper Hutt to Waikanae).

Please note that we do not gain any advantage in trade competition through this submission.

We do wish to be heard in support of our submission.

Summary

Please don't hesitate to contact us if you would like to discuss this further.

Yours sincerely,



Roger Fairclough



Anna de Raadt