

Proposed Natural Resources Plan:

Submitter:

Ian Bengé and Martin Bengé

Submitter Number:

S83

FORM 5: SUBMISSION ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN

Under Clause 6 of the First Schedule to the Resource Management Act 1991

TO Greater Wellington Regional Council (the 'Council')
SUBMISSION ON The Proposed Natural Resources Plan for the Wellington Region 2015 (the 'Proposed Plan')
NAME OF SUBMITTER Ian Benge and Martin Benge

Ian Benge and Martin Benge **could not** gain an advantage in trade competition through this submission.

Ian Benge and Martin Benge **wish to be heard** in support of its submission

If others make a similar submission Ian Benge and Martin Benge will consider presenting a joint case with them at a hearing.

INTRODUCTION / CONTEXT

The submitters being Ian Benge and Martin Benge, are shareholders in a large landholding commonly referred as 'Plimmerton Farm' located at 71 State Highway 1 Plimmerton and legally described as Pt Lot 30 DP 328137. Plimmerton Farm has a site area of 385 hectares comprises the largest single rural landholding in the Plimmerton area. While Plimmerton Farm is currently zoned Rural in the Operative Porirua City District Plan, Plimmerton Farm has been identified as an urban growth/development area in the Porirua City Council Northern Growth Area Structure Plan.

The Northern Growth Area Structure Plan was adopted by Porirua City Council in December 2014 as a strategy for guiding future long-term urban growth between Camborne and Pukerua Bay. The Structure Plan sets out the scenario for future urban development in this area over a 30+ year period. A district plan change to give legal effect to the Structure Plan is expected in the next 2 years. The plan change is expected to introduce new provisions into the District Plan for regulating future urban and rural residential development within the application site.

The majority of the Plimmerton Farm site except for the main ridgelines spanning the site are identified as being suitable for residential and rural residential development. The area contained within proposed Lot 1 and the southernmost portion of proposed Lot 2 is identified as the 'Camborne North Development Area'. The structure plan states that:

"Enabling the extension north of the existing Camborne urban area enables the increased utilisation by new residents of the amenities and infrastructure of the existing suburb and those of areas nearby such as Plimmerton. This includes schools, shops, rail station at Plimmerton, open spaces, churches, roading and other services."

Based on the details contained within the Structure Plan documents it is clear that, while Plimmerton Farm is currently zoned rural, future plan changes will allow for a more intensive development of the site. The Structure Plan report states that:

"Residential development is considered to be the likely predominant future land use in the Northern Growth Area. Such residential development could assume a variety of forms and densities...."¹

Additionally, the consultation documents for the Structure Plan include details of consultation with landowners where it was expressed that:

¹ Page 15, Porirua Northern Growth Area Structure Plan, Issues, Opportunities and Constraints Report
(file:///C:/Users/slb/Downloads/Northern%20Growth%20Area%20Structure%20Plan%20-%20Report%2031Mar14.pdf)

Farming is not an economically viable option for the future of the land. Given low financial return from farming, majority of landowners have an interest in some or all of their land being developed for urban and/or rural lifestyle purposes.

The submission points that follow correspond directly with the sites inclusion in the Northern Growth Area Structure Plan which represents Porirua City Councils intent and commitment to supporting and enabling the urban development of Plimmerton Farm.

SUBMISSION POINT 1

While it is accepted that the ecological values of the site need to be recognised in the development, there is also a need to accept that development of the area as per the intentions expressed in Porirua City Council's Northern Growth Strategy Structure Plan will require substantial earthworks and some stream reclamations. While this will come with some adverse environmental impact, this needs to be balanced against achieving an efficient and viable development. The submitters note that sites which are not earthworked will require more expensive housing design, typically require larger lot sizes, and will limit the mix of housing opportunities that can be achieved across the site. The submitters are concerned that these realities are not sufficiently recognised in the Proposed Natural Resources Plan.

While the submitters **support Policy P102(c)** insofar that it provides an appropriate exemption for development undertaken on future growth areas to be excluded from a strict avoidance of all stream reclamations, the submitters are concerned that this policy has not been carried through to a rule framework that supports the exclusion. Accordingly, the submitter **opposes Rule R127** that classifies all reclamation of the bed, or any part of the bed of a river or lake a non-complying activity. The submitters believe that in order to balance environmental effects with the provision of development within identified growth areas a Discretionary Activity status is appropriate.

RELIEF SOUGHT

Ian Benge and Martin Benge seek the following decision from the Council:

1. **Retain Policy P102(c)** as notified

AND

2. **Amend Rule R127** as follows (deletions in strikethrough, amendments underlined):

RULE R127: RECLAMATION OF THE BEDS OF RIVERS OR LAKES – NON-COMPLYING ACTIVITY

The reclamation of the bed, or any part of the bed, of a river or lake:

- (a) associated with the piping of a stream, or*
- (b) in a site identified in Schedule A1 (outstanding rivers), or*
- (c) in a site identified in Schedule C (mana whenua)*

except where the reclamation or drainage is associated with a growth and/or development framework or strategy approved by a local authority under the Local Government Act 2002

is a non-complying activity.

AND

3. Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the submitter.

SUBMISSION POINT 2

Ian Benge and Martin Benge **oppose** the inclusion of the streams that are located within the Plimmerton Farm site as a river that have of significant ecological value in **Schedule F1** of the Proposed Plan.

Although the submitters accept that the streams identified may have some ecological value, the submitters are not aware of any detailed ecological assessments undertaken on the Plimmerton Farm that have evaluated these streams as having significant ecological value. The inclusion of these streams in Schedule F1 and the policies and rule framework proposed to manage streams within this schedule sets an extremely high threshold for environmental protection and avoidance of all adverse effects which poses significant impediments for development of the Plimmerton Farm site.

RELIEF SOUGHT

Ian Benge and Martin Benge seek the following decision from the Council:

4. Delete any reference to streams identified as Schedule F1 on the Plimmerton Farm site from the Maps of the Proposed Plan.

AND

5. Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the submitter.

SIGNATURE:



(Signature of submitter or person authorised to sign on behalf of submitter)

DATE: 25 September 2015

ADDRESS FOR SERVICE OF SUBMITTER:

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