

Monday, 20 April 2026

*Te Hui o Te Kaunihera ā-Rohe o Heretaunga*

**Hastings District Council**

**Hearings Committee Meeting**

*Kaupapataka*

# Attachments

## **Private Plan Change 7 – Golf Sport Development Limited Partnership – Hastings Golf Course - (RMA20230336)**

**(Rescheduled Hearing Date)**

*Te Rā Hui:*

Meeting date: **Commencing on Monday, 20 April 2026**

*Te Wā:*

Time: **9.00am**

*Te Wāhi:*

Venue: **Council Chamber  
Ground Floor  
Civic Administration Building  
Lyndon Road East  
Hastings**

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**TE KAUNIHERA Ā-ROHE O HERETAUNGA**

ITEM	SUBJECT	PAGE
2.	<b>PRIVATE PLAN CHANGE 7 - PRIVATE PLAN CHANGE 7 – GOLF SPORT DEVELOPMENT LIMITED PARTNERSHIP – HASTINGS GOLF COURSE - (RMA20230336)</b>	
	<b><u>Document 2</u></b> Containing this attachment	
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Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

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Appendix A – Summary of Recommendations on  
Submissions and Further Submissions by Topic

Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

Topic 1: Impact on Highly Productive Land / Versatile Soils

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S1.1	Save the Plains	General	Support	This land is of a non-food production soils type therefore, fits well with development.
FS6	- Gourmet Blueberries Ltd		Oppose S1.1	Reject S1.1
S7.3	Peter Steers	General	Oppose	Surely this is actual farmland anyway?
S19.2	Dr Corinna Proehl	General	Oppose	This goes against concept to preserve rural areas for agriculture, vineyards etc. While it may not be the best soils, fantastic wines are grown nearby. It allows for urban sprawl which the district plan is trying to stop. "Build up, not out". It will create a precedence to allow further urban sprawl with all the associated problems and change the character of the area.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S19.2	Accept S19.2
FS6	- Gourmet Blueberries Ltd		Support S19.2	Accept S19.2
S39.2	Bruce Mactaggart	General	Oppose	The development would impact productive Plains land.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S39.2	Accept S39.2
FS6	- Gourmet Blueberries Ltd		Support S39.2	Accept S39.2
S48.2	Hamish Ross	General	Oppose	The proposal for a dense residential subdivision in the Plains Production Zone with the associated negative effects on existing rural activities and the precedent this may create for future housing developments. The applicant is seeking to remove the Golf Course land from the region's pool of productive & versatile soils by changing the zoning, arguing that there are minimal high-quality soils within the site and no potential for highly productive land use, and that therefore little is being lost. The Gimblett wine growing area and Gourmet Blueberries show that "lower quality" soils can be very productive. This application seeks the introduction of conflicting residential activities into the Plains Zone, which undermines the ability to effectively and efficiently manage and invest in surrounding rural land for agricultural, horticultural and viticulture-based activities and appears to be completely contrary to the objectives and policies of the District Plan.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S48.2	Accept S48.2
FS6	- Gourmet Blueberries Ltd		Support S48.2	Accept S48.2
S61.2	Hawke's Bay Golf Club	General	Oppose	Soil Quality and Agricultural Productivity: The land in question is part of the Heretaunga Plains, a renowned area for its highly fertile soil. By changing the zoning to Sport & Active Recreation, the land may no

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				longer be used for agriculture, thereby reducing the region's capacity for food production. Agriculture in this area is not just a local concern—it contributes significantly to New Zealand's food security and economy. Disrupting the soil quality for recreational purposes could have long-term environmental consequences that would affect both the immediate area and the broader ecological balance.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S61.2	Accept S61.2
S66.4	Greg Reynolds	General	Oppose	<p>The Plan states that the land affected by the Plan is predominantly LUC Class 4 and 6 – so not Highly Productive Land (HPL). Whereas a look on the HBRC website map for Land Use Capability information clearly shows the land is LUC 3 and 4. So yes it includes HPL. How can there be a difference? Attachment 29 to the Plan is an independent technical review of the Land Use Capability Assessment Report and the Economic Overview Report in the Plan. There appears to be some confusion over which version of mapping should be used that identifies whether the land is HPL or not. The review states that the Plan has used the wrong mapping and therefore its recommendations are inaccurate. This affects the cost benefit analysis to such an extent it is incomplete. I play at Bridge Pā, and the vacant land besides the existing No2 and No 5 and No 17 looks to be in poor condition. Why on earth would they be proposing building the houses where the current golf course is (on HPL) and not on the current areas of poor land (sand and pumice)? This does not even appear to be an option in any iteration of the Plan though there is a comment that the council would not support the housing on the outside of the course – why not? The following section is from the original proposal presented to the members at a Special General Meeting called to endorse the Plan in Sept 2021.</p> <p>My comment is that the land outside of the current holes but within course boundary (currently pine forest and what looks to be waste land) is not HPL, whereas the golf holes are (thanks to many decades of watering and care by green keepers). So why rip up the golf holes for housing and then develop new holes on what looks to be inferior land? Isn't this just creating more work, more admin, more cost and more time. Shouldn't doing the development without affecting the golfers be a serious consideration? Can the council confirm it has told HGC and GSDLP that the houses have to go inside the golf holes? And under what rules has the council made this decision. Or have the members been misled? This would greatly reduce the impact on the golfers and mean new golf holes do not need to be built.</p>
FS6	- Gourmet Blueberries Ltd		Support S66.4	Accept S66.4
S80.5	Trevor Robinson	General	Support	<p>From a planning perspective, PC7 seeks to correct an anomaly in the District Plan. It is absurd that an 82ha site that is operated as a golf course for in excess of 100 years should be zoned for primary production purposes. It did not reflect the actual and potential future use of the land when that zoning was put in place, and it does not reflect it now. The fact that an adjoining 40 ha site has been used for golf course purposes (i.e. Hawkes Bay Golf Club) since the 1960s reinforces this fact. If PC7 is accepted, it must surely only be a matter of time before that site is also rezoned Sport and Active Recreation to recognise that practical reality. Concerns over potential loss of 'highly productive land' need to be viewed in that context also. While Hastings District Council has rightly been concerned to ensure that the National Policy Statement for Highly Productive Land 2022 is given effect, PC7's proponents have provided a detailed analysis confirming that to be the case. I focus on the purpose of that National Policy Statement. Its sole objective seeks to protect highly productive land for use in land-based primary production, now and in the future. The site has been a golf course for a very long time with primary production (small areas of production pines, which do not of course need and represent an inefficient use of highly productive soils) limited to peripheral areas. That position is unlikely to change in</p>

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				the future irrespective of the fate of this proposal. There is accordingly a degree of unreality about the entire inquiry.
<b>FS6</b>	- Gourmet Blueberries Ltd		Oppose S80.5	Reject S80.5
<b>S82.2</b>	Hawke’s Bay & East Coast Aero Club	General	Oppose	While the Aero Club is concerned primarily with aviation and related safety, future growth, and reverse sensitivity effects, the Plains Production Zone rules protecting productive soils are an important part of the buffer zone that prevents inappropriate residential activity from being created near the aerodrome. The applicant is seeking to remove the Golf Course land from the region’s pool of productive and versatile soils by changing the underlying zoning and relies upon a report from LandVision which concluded that there are minimal high-quality soils within the site, no potential for highly productive land use and therefore little is being lost. The Aero Club supports the peer review of the Land Use Capability Assessment by Stuart Ford of The AgriBusiness Group, which finds that the applicant’s evidence supporting the rezoning in this regard falls well short of the case required to support it. PC7 contemplates a dense residential subdivision proposal on Plains Production land. A development of this nature will be expected to change the character of the adjoining Plains Production zoned land.
<b>FS1, FS2, FS3, FS4, FS5, FS7</b>	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S82.2	Accept S82.2
<b>S85.2</b>	Bruce Govenlock	General	Oppose	The applicants are applying for creation of a new sport and active recreation Zone, but the capacity of the course is not being increased. The golf course and driving range already exist. Only 170 residential dwellings is being created. This application should be seen and examined clearly for what it is – a dense residential subdivision proposal on Plains Production Zoned land. Hastings District Plan 6.2.3. Policy PPP11 requires that any subdivision within the Plains Production Zone does not result in reducing the potential for versatile land to be used in a productive and sustainable manner. The applicant states that the site is currently used as a golf course and therefore is effectively already not available and already removed from the versatile soil pool of the Plains Zone and that the soils are of low quality for conventional agriculture. This argument is a nonsense as the Golf Course is predominantly undeveloped (not built out) land and is available should the land be required. A similar argument was used in the Environment Court case Ngatarawa Development Trust and others vs HDC which concerned the proposed development of a golf-residential housing development on the neighbouring Hawkes Bay Golf Course. In that case advice was provided that the soils were of low quality and not suitable for conventional agriculture. Notably that proposal was declined by the Court and afterwards a substantial portion of the Golf Course land that was largely in pine trees was sold and is now in productive horticultural use economically benefitting the Region. Notably this Hastings Golf Course also includes a substantial portion of surplus land on the eastern boundary that is in pine trees and could be sold for valuable productive use, yet the applicants proposal seeks to permanently remove this and the rest of the golf course land from the Plains Zone soil pool. I support the view of the HDC peer review - Land Use Capability Assessment by Stuart Ford of The AgriBusiness Group, that the applicant’s argument on the soil’s productive value and potential falls short.
<b>FS1, FS2, FS3, FS4, FS5, FS7</b>	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S85.2	Accept S85.2

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
FS6	- Gourmet Blueberries Ltd		Support S85.2	Accept S85.2
S87.3	Stephanie Eilers	General	Oppose	I support the Land Use Capability Assessment by Stuart Ford of the AgriBusiness Group, that the applicant's argument on the soil productive value and potential falls short. Look at the sustained growth of Gourmet Blueberries. By building the residential development on the Hastings Golf Course, that land is permanently removed from the Plains Zone. The land, the versatile soils, could be utilized more appropriately, perhaps to grow food. It is worth looking to the future when land will become scarcer for food production. Food production technology may change but the land resource will still be needed. The proposal of a new 'Sport and Active Recreation Zone' within the Plains Zone to enable an urban residential precinct within the Hastings golf course also causes concern that future use of the new zone may enable intensification of this, or development of other similar urban residential precincts in otherwise protected Plains Zone lands. What if the decision was made to reduce the 18-hole course to a 9-hole recreational course and expand the residential precinct? Will the creation of new "popup" Sport and Active Recreation Zones be used as a mechanism to bypass district planning strategies for the purpose of building urban housing on easy to develop flat Plains Zone land?
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S87.3	Accept S87.3
FS6	- Gourmet Blueberries Ltd		Support S87.3	Accept S87.3
S89.2	Gourmet Blueberries Limited	General	Oppose	The Applicant's assertion that the subject land is of a quality that is inferior for intensive and high value primary production is inaccurate. Gourmet Blueberries Limited (GBL) operates a large-scale horticulture operation, producing blueberries, blackberries and winter vegetables, in the same locality as the proposed development, and on soils with similar characteristics to those on the Golf Course's land. GBL provided evidence in Ngatarawa Development Trust & Ors v Hastings District Council (W17/2008) which persuaded the Environment Court that, while the nearby Hawke's Bay Gold Club land may not comprise elite soils, they can be very productive under the right regime (as with the Gourmet Blueberries land). If the subject land was to be used for the right type of sustainable intensive horticulture production, GBL expects that it would provide financial returns superior to those used in the economic analysis presented by the Applicant.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S89.2	Accept S89.2

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Topic 2: Reverse Sensitivity Impacts on Land Based Primary Production

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S21.1	Eventing Hawke's Bay	General	Oppose	I represent Eventing Hawkes Bay which is an affiliate of Equestrian Park. We are totally opposed to this application.
S41.1	Dharminder Singh	General	Oppose	I purchased a property on the boundary of Hastings Golf Club in 2004 and have built up a very successful business with horticulture and agriculture activities including a packhouse, storage sheds, storing heavy vehicles, storage of produce, land cultivation and cropping. These activities create aromas, noise of heavy vehicles and tractors (24 hours a day and 7 days a week) and dust during cultivation and harvesting periods. Our business does not want to be put in a situation where these necessary activities will be jeopardized. We have 20 fulltime staff employed and up to 50 seasonal workers. These jobs would be a great lose to the community. As a reference to Arataki Honey and Mushroom Farm, when housing development encroach on existing businesses its always the businesses that have to shut down. Residential development has proven to be a disadvantage for existing businesses and landowners. I have invested several millions of dollars in this property. All those years of hard work could be wasted if this project continues.
FS6	- Gourmet Blueberries Ltd		Support S41.1	Accept S41.1
S87.2	Stephanie Eilers	General	Oppose	Reverse sensitivity issues have the likely impact of curtailing current and future expansion of allowable Plains Zone activities in the vicinity of the proposed PC7 residential precinct. Frost-fans, bird scarers, and night-time harvesting work associated with horticultural and agricultural activities create noise and nuisance. Both sides of Stock Road near the golf club are identified as an area for future industrial development to support Plains Zone activities.
FS6	- Gourmet Blueberries Ltd		Support S87.2	Accept S87.2
S89.1	Gourmet Blueberries Limited	General	Oppose	<p>Gourmet Blueberries Ltd (GBL) is concerned about:</p> <ul style="list-style-type: none"> <li>the proposed re-zoning of Plains Production Zone Land and the effects of that, including precedent effect;</li> <li>the proposed development of new greenfield residential housing subdivision in an agricultural and horticultural area, and potential issues associated with that.</li> </ul> <p>GBL is NZ's largest blueberry grower by volume and a significant contributor to both the Hawke's Bay economy and NZ's export sector. GBL farms in a sustainable manner producing high value crops on land in an area considered by the Applicant to have poor quality soils. The boundary of GBL's Hastings site (which has grown from 53ha to over 160ha since 2001) is approximately 650 metres from the Applicant's property.</p> <p>Rezoning the Golf Club's land from Plains Production Zone to allow establishment of residential development is incompatible with large scale horticultural and agricultural activities in the vicinity.</p> <p>Allowing the re-zoning will set a precedent which will be relied upon by other applicants seeking to develop Plains Production zoned land in a manner not contemplated by that zoning.</p> <p>If the Applicant's proposal were to be approved, this would create a precedent for more housing in the Plains Production zone. For example, it may prompt the Hawke's Bay Golf Club to re-apply for consent to undertake its previous development proposal (the one which was the subject of Ngatarawa Development Trust &amp; Ors v Hastings District Council (W17/2008)) or something similar.</p> <p>The Hawke's Bay Golf Club is immediately adjacent to GBL's property, sharing a common boundary of nearly 600 metres on the northeast corner of the course. Any such application would give rise to reverse sensitivity issues (more on that below) which would have even greater significance given the proximity of GDL's and Hawke's Bay Golf Club's land.</p>

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				<p>The proposed rezoning is not compatible with the existing large scale horticultural or agricultural activities in the area. Rezoning land from Plains Production to allow establishment of a residential development will create reverse sensitivity issues due to the location of residential housing subdivision and developments amongst large scale primary operations (horticulture and agriculture) in Plains Production zone. The Environment Court observed in regarding Ngatarawa Development Trust &amp; Ors v Hastings District Council (a case which involved proposed development by the Hawke’s Bay Golf Course on land adjoining GBL’s land): Reverse sensitivity could be a problem and restrain rather than enable rural production and land uses (RO2 and RO3). Worse than that, the presence of residential uses around a perimeter of the golf course would impose real restraints on accepted practices in the rural area (RP2). Activities on neighbouring properties that could occur as of right under the permitted activity category would require a resource consent and that could be declined or made subject to conditions. The sustainability of surrounding productive land uses could therefore be undermined and the activities would not safeguard the sustainability of natural resources (RP3 and RP5). The reverse sensitivity issues include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Use of sprays, which could be observed and at times smelt by nearby residents.</li> <li>• Primary production at times will generate odours that can be smelt by residents, leading to objections (see Hawkes Bay Regional Council v Te Mata Mushrooms Company Ltd CRI-2015-020-1551, 30 March 2016, District Court, Hastings and Hawkes Bay Regional Council v Te Mata Mushrooms Company Ltd [2018] NZDC 16898).</li> <li>• Noise effects permitted in the Production Plains zone (including but not limited to those listed below) could lead to complaints from residents: (i) Machine work for ground preparation and harvesting of crops. (ii) Operation of machinery during the day and nighttime. (iii) Bird scaring devices. (iv) Noise from high worker numbers during manual harvest of crops. (v) Noise and lights during the night when frost protection procedures are necessary. This includes the use of permanently fixed frost fans and helicopters.</li> <li>• Visual effects of large netting structures on some properties growing high value crops (see Tasman Action Group Inc v Tasman District Council, C63/07 and C96/07). 13.5 Visual effects from establishment of growing houses, packhouses and other structures required to support primary production businesses. Some of these structures may not be considered particularly attractive by future residents who complain or object that these structures obstruct or impair their outlook.</li> </ul> <p>Despite the “No Complaints” covenant proposed by the Applicant, a vocal, politically astute and united group of residents from the proposed development could put pressure on both GBL and the District Council (and possibly the Regional Council) to implement restrictions on GBL’s business and others. GBL has established its operation in Hastings, involving considerable investment over more than 20 years. GBL is a large employer of Hastings and Flaxmere residents, a significant contributor to both the Hawke’s Bay economy and generator of export receipts for the country. GBL’s shareholders and management wish to avoid the risk of having their business activities curtailed by residential neighbours objecting to GBL’s existing and lawful practices.</p>

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Topic 3: Economic Impacts and Tourism Potential

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
<b>Economic Impacts</b>				
S1.2	Save the Plains	General	Support	Boosts high end visitor numbers into our region which is vital for our local regional economy. Gives employment opportunities to local people and companies.
S29.1	Tom Mckimm	General	Support	This proposal will create opportunity for jobs in construction short term, while long term it will create a recreation hub and residential housing that will benefit the wider area. Throughout New Zealand there are fantastic examples of redevelopment and extended developments around golf courses. The economic and social benefits to the local Bridge Pā area and wider Hawkes Bay will be very positive. Both tourism spend and residential living will increase the vibrancy and social ambience of the area while creating more jobs and increased rates take. Proposal is a great positive for Hastings Golf Course but also all of Hawkes Bay.
S54.1	Mathew Perry (Golf in New Zealand)	General	Support	Hastings Golf Club is a valuable community asset, offering year-round playable conditions and hosting every major New Zealand championship over the past 113 years. The Golf Club requires significant upgrades to maintain its relevance at the national and international levels. By implementing the proposed zoning changes and facility upgrades it can modernise and elevate its standing. The club has the potential to join Cape Kidnappers as a premier international golf destination. <ul style="list-style-type: none"> <li>• This zoning change will help solidify Hastings Golf Club as a home for the NZPGA professional tournament/event.</li> <li>• The tournament attracts 132 golfers and additional visitors, including caddies, coaches, support staff, friends, and families.</li> <li>• A significant portion of the field will travel from Australia for this week-long event, which will bring international attention and economic benefits to the region.</li> <li>• By upgrading Hastings Golf Club, more events like these can find a permanent home there, bringing valuable visitors to our region and ensuring long-term tourism growth.</li> </ul> Without these upgrades, it will struggle to compete with other premier golfing destinations and may continue to be left off the itineraries of domestic and international visitors. This project to ensure the long-term viability of Hastings Golf Club as a world-class golfing destination, a home for major tournaments, and a driver of tourism and economic growth for Hawke's Bay.
S59.5	Laura Kamau	General	Support in part	Increase in rates. This is a major concern as it is proposed that this is a lifestyle development a leisure one. That would mean a high valued homes. The increase in rates on our community to pay for infrastructure that does not cater our community Basic services to Bridge Pā. Will the development assist in beautifying our community? Have rubbish and recycling kerbside collection? The application does not include an aspirations for Bridge Pā. There are no community off setting in the application. How will their applicant address these? Is there a complaints procedure?  That the ratable value of our properties be kept within the context of our community and not the surrounds. Our community was the 'reserve swamplands' and a 120 year promise of building a township. This has yet to come to fruition. That the beautification of our community be included in the resource consent and that the applicant must have community driven design and infrastructure in place to help with these services. That the golfing community support and give back to Bridge Pā. That Bridge Pā do not wish for more of a rich man's playground while they have their primary residence elsewhere.
S63.1	Megan Frater	General	Support	The proposed development will have a positive impact on Hastings and surrounding areas. Everything we can do as a province to offer a destination option to other New Zealanders and overseas visitors can only be of benefit to Hawke's Bay. I would also expect that the

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				surrounding local area would receive a boost with regards to business and housing development.
<b>S88.3</b>	Eruera Morrison, John Newton, Edline Morrison & Maria Newton	General	Oppose	The jobs created by this development are unlikely to provide long-term security for local Māori. Furthermore, increased tourism and traffic will place strain on our community's infrastructure, with what little we do have, without guaranteeing benefits for the people of Bridge Pā.
<b>Tourism Potential</b>				
<b>S19.1</b>	Dr Corinna Proehl	General	Oppose	Who would be attracted to travel to Hastings to play golf? Wealthy tourists will prefer Cape Kidnappers and Kauri Cliff. Hard to imagine overseas tourists playing at the Hastings Golf Course as this course standard is common in New Zealand and other countries. There are more attractive locations in New Zealand and the world.
<b>S54.2</b>	Mathew Perry (Golf in New Zealand)	General	Support	<p>Golf tourism is projected to be a USD 27 billion industry by 2025 and grow to USD 65.8 billion by 2035. Over 80% of our companies international guests to New Zealand utilise private air travel (helicopters or jets) at least once during their trip. The Golf Clubs proximity to the Aerodrome makes it uniquely positioned to attract high-spending visitors arriving by air, thus supporting local businesses. There is no accommodation of scale near this area, making it difficult to attract high-value visitors who expect integrated stay-and-play experiences.</p> <p>While golf is a primary driver for inbound tourism, our international guests also consider off-course activities when selecting destinations. Hastings Golf Club benefits from the following near the course.</p> <ul style="list-style-type: none"> <li>• World-class wineries &amp; restaurants.</li> <li>• Outdoor adventure opportunities (hiking, biking &amp; cycle-ways, wildlife reserves).</li> <li>• Cultural &amp; historical attractions.</li> </ul> <p>With the proposed upgrades, the course can reclaim its place on domestic &amp; international golfing itineraries, increasing visitor numbers and economic benefits for the region.</p> <p>Long-Term Impact &amp; Recovery from Cyclone Gabrielle.</p> <p>Since Cyclone Gabrielle, golf participation and membership have continued to grow. This project presents a golden opportunity to:</p> <ul style="list-style-type: none"> <li>• Leverage the sport's growth.</li> <li>• Support economic recovery in the region.</li> <li>• Secure the club's future as a top-tier golf destination.</li> </ul>
<b>S75.2</b>	Golf New Zealand	General	Support	<p>Prior to the Covid-19 pandemic, inbound golf tourism was valued at over \$400m annually to New Zealand's economy. This success is dependent on a strong portfolio of courses which appeal to the visitor market. It's especially important that quality courses are clustered to encourage visitation and increase length of stay. In order to continuing satisfying demand, we must have more courses of interest to a travelling golfer. Our approach to golf tourism has always been focused on value rather than volume. Therefore, we target couples and families traveling together who stay longer, spend more, and are much more immersive in the regions they visit. We fully understand that not all travellers will be golfers, and this ensures that tourism spend is dispersed among the wider economy.</p>
<b>S77.1</b>	The Clubhouse	General	Support	<p>As a company with a long history of golf events, we understand the need for quality golf alongside facilities and accommodation that suit the needs of the visitor market. While this type of facility is abundant overseas, we have very few in New Zealand. Having short stay accommodation on site is of huge benefit for event organisers. Golf Tourism is a significant contributor to the New Zealand economy, with a preCovid spend of over \$400m NZD from international visitors. When domestic tourism is included, that number grows significantly, signifying that the sector is one of our most important of the tourism economy. The proposed facilities at Hastings Golf Club, alongside the improved offerings in Hastings City, make this a very attractive location for events centred around golf, sport, and recreation. The proximity to the Marquee course at Cape Kidnappers, the local</p>

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				wineries, and nearby attractions in Napier allow the events industry to have confidence in the region's ability to deliver a memorable event. There is significant global precedent for golf and residential developments like that proposed. We work for Millbrook which is an exceptional development where the broad range of facilities and the residents contribute widely to social and economic fabric of the Wakatipu basin. Hawke's Bay Airport and Bridge Pā Aerodrome provide excellent connectivity for events. Over the years, we have scouted many destinations around the country, including Hastings. To date, we have not been able to stage a major golf event in the Hawke's Bay region but definitely recognise the appeal, and if the right facilities were available, this would absolutely encourage us to give the region another serious look. From experience with events targeting domestic, short haul, and long-haul travellers, we find golfers to be excellent visitors. They are low volume with a high per person spend and significant crossover to other premium activities such as food, wine, cycling, and hiking. Golfers also travel in a much broader range of months than many other holiday travellers. Shoulder season events have been a key focus of Central Government, as they push travel and tourism spend away from the peak 100 days of summer. As a company, we focus on encouraging spouses and extended families accompany attendees. This increases per person spend and drives more value to the host region.
<b>S80.2</b>	Trevor Robinson	General	Support	If the purpose of the site-specific precinct provisions is achieved, that will also have broad economic benefits for the region from enhancing the appeal of Hawke's Bay to both domestic and international 'golf tourists'.
<b>S83.2</b>	Hastings Golf Club	General	Support	Boosting Tourism and Economic Growth By incorporating residential development and short-term accommodation into the proposal, the project promises to generate significant tourism revenue for the region. The improved facilities will not only attract golf enthusiasts but also a broader range of visitors, thereby creating local employment opportunities and stimulating additional spending in the area.
<b>S97.1</b>	Cape Kidnappers Station Limited	General	Support	Cape Kidnappers shares a commitment to enhancing the tourism ecosystem in Hawke's Bay, and to improved outcomes for the environment, both of which are addressed thoroughly in this application and will be delivered through this Project. An enhanced golf offering at the Hastings Golf Club would work to attract more golfers and premium visitors to Hawke's Bay. These visitors could be from the domestic or international market, but we know from our own experience and the available data, that clusters of export-ready courses are critical for improved visitor numbers. This is evident in Mangawhai, Taupo, and Queenstown. The proposal will provide flow-on benefits to our own guests by providing them with additional golf playing options and experiences at a local high quality course. Golfers are not high-volume visitors, but they are among the highest spending, and are willing to travel across all 12 months of the year. A focus on value over volume is one we have always believed in, and one currently being strongly pushed by Central Government. The strategy is to draw visitors to all the activities Hawke's Bay has to offer. Many local businesses are supported by these visitors, and the numbers clearly show that Hawke's Bay is not reaching its tourism potential. The development at Hastings would be complementary to the Cape Kidnappers offering. To Cape Kidnapper's knowledge, there are no other existing opportunities in Hawke's Bay to provide the type of quality development, benefits and experience that is proposed at Hastings Golf Club. We strongly believe that it will provide significant benefits for Hawke's Bay that are still needed as the region continues to recover after the cyclone.

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Topic 4: Golf Course and Facilities

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S2.1	Kim Goodwin	General	Oppose	<p>Presently a relatively cheap golfing experience top-rated golf course with a well-maintained club house and food facilities. The club is financially secure.</p> <p>There is however a need for new facilities that could easily be upgraded. Why does this need to be turned into a housing development in return for a new single storied clubhouse with poorer views of the course where we will still only have food and refreshments? Clubhouse will not become a restaurant destination when there are plenty of much closer excellent eateries around.</p> <p>The Palmerston North restaurant works well but it is right in town. Demise of Sileni Restaurant not that far away an example.</p>
S26.1	Moray Grant	General	Oppose	<p>As a member I enjoy the facilities and would like to see it remain as a standalone Golf Course. Demolition of these facilities a huge waste of resources and we should look after our Heritage. It is a huge and complex development, and if the developer doesn't finish the project, it leaves the Club with an unfinished mess. Golf Harbour is one example of rising fees and unpaid rates leading to closure.</p>
S27.1	Mike Hill	General	Oppose	<p>The development will erode the nature of the Hastings Golf Club and its history. The Club House is an iconic building with rich wooden floors throughout and has a spectacular view of the course. All this will be lost as the building and its historic value will be pulled down.</p> <p>Don't want to play golf, for the next decade or two, in the middle of a construction zone.</p> <p>With the new Pro Shop which was built a few years ago, the driving range building, the club is looking very smart. With money in the bank the clubhouse could get a well-deserved update. Future proofing for the next generations, the golf course has been through about five generations so far and if left alone will still be here for at least another five.</p> <p>This development is on the same path as Gulf Harbour which is now in ruins waiting for someone to turn it into houses. It had 1.5 million people in Auckland, the climate and the beaches to support it. We only have 150 thousand in Hawkes Bay. The viability of this development doesn't stack up for our golf club.</p>
S66.1	Greg Reynolds	General	Oppose	<p>Hastings Golf Club (HGC) approached Greg Turner in 2018 to get an independent assessment on the irrigation upgrades the course was undertaking. It is my opinion Mr Turner widened the discussions to include potential redevelopment and in 2021 a proposal was put to the members to develop the land and provide residential accommodation. The proposal was agreed by the members and thus the Plan had been developed and submitted. There is no information in the Plan on what transpired between 2018 and 2021 to get from discussing irrigation to redeveloping the golf course. The Plan states that "The HGC initially approached GSDLP in 2018 to review the operations of the HGC and provide recommendations and advice on the golf design and tourism opportunities to provide a better financial outcome for the HGC which would enable them to redevelop the existing facilities." And this is from the golf clubs Special General Meeting...</p> <p>In 2018, HGC consulted with Greg Turner (ex-professional golfer, golf course designer, and now a director/shareholder in Golf Strategy Group) about the planned new irrigation system, to ensure it was laid out and constructed in the appropriate way.</p> <p>GSDLP is documenting in the Plan that it was the golf course that initiated the redevelopment discussions when in my opinion it was the developers. Perhaps this is not a big issue, but for me, not representing the facts accurately so early in the Plan gets me concerned.</p> <p>I see no evaluation on the adverse effects to the golfers at HGC. After all it is a golf course, its purpose is to allow members and visitors to play golf. There is an expectation that a number of existing club members will reside on site in future. Has there been any work done to confirm this expectation e.g. an expression of interest? What is the impact on the Plan if there is poor uptake from the members is, for example, they have</p>

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				become frustrated with the disruptions caused by the development and moved on?
<b>S75.1</b>	Golf Zealand / New	General	Support	Golf is a growing sport, and one of the highest participation sports in New Zealand. It provides recreation, exercise, and contributes to the health and wellbeing of New Zealanders. The project at Hastings Golf Club will see improvements made to a course that is already used for regional and national events. In addition to this, the facilities will be significantly upgraded to meet an export-ready standard, and the location sits in the heart of Hastings wine and cycle region. With a world-renowned course nearby at Cape Kidnappers, there is an increased opportunity to attract lifestyle travellers and golfers to Hawke’s Bay and encourage them to stay longer. We are pleased to see such great interest from the golf club’s members, the consultation with mana whenua, and we are completely supportive of the project.
<b>S78.1</b>	Noel Martin-Smith	General	Support in part	I do NOT oppose the application to change the zoning from Plains Productive zone to Sport and Recreation zone.
<b>S80.1</b>	Trevor Robinson	General	Support	My submission reflects both my personal interest as a member of the Hastings Golf Club and my professional experience as a resource management practitioner since 1991, when the RMA was enacted. As a golf club member, implementation of PC7 will have obvious benefits in terms of an improved course layout, and improved facilities on and off the course.
<b>S83.1</b>	Hastings Golf Club	General	Support	<p>This proposal presents a unique opportunity to enhance both Hastings and indeed the wider Hawke’s Bay community—by revitalising the Hastings Golf Club at Bridge Pā and creating significant golfing, recreation, and tourism opportunities.</p> <p>Enhancing a National Sporting Icon - Hastings Golf Club, established on this site in 1912, is widely recognised as one of New Zealand’s premier club golf courses. The Club recently hosted the Wallace Development NZ PGA Championship in both 2024 and 2025. The 2024 won ‘Event of the Year’ in the Golf New Zealand annual industry awards. It has been a regular ‘home’ to the New Zealand Strokeplay on a three-year cycle and hosted New Zealand Men’s Seniors and Interprovincial tournaments several times. All bringing many visitors to our region boosting discretionary spend. Despite its sporting excellence, the club’s existing facilities no longer match the quality of its golf course. Other regions in New Zealand, particularly Queenstown, Taupo, and Mangawhai, highlight the benefit to their district by having at least two world class golfing facilities. Hastings Golf Club’s significantly improved facility will complement the Cape Kidnappers course offering. The GSDLP proposal addresses this by providing much-needed investment to “futureproof” the course and facilities and ensures that the club will remain viable and competitive for decades to come.</p> <p>Optimising Underutilised Land for Community Benefit - The small parcel of land currently owned by the club which is targeted for the development is minimally productive in its present state. Repurposing this land for residential and tourism-related use ensures that the club, residents, and the wider community benefit from an enhanced use of assets, resulting in a net positive impact for our community.</p> <p>The GSDLP proposal is a forward-thinking initiative that addresses the immediate infrastructural needs of the Hastings Golf Club while simultaneously enhancing the tourism appeal and economic vitality of Hastings and Hawke’s Bay. We firmly believe that this project will preserve the club’s prestigious heritage and contribute to long-term community prosperity.</p>

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Topic 5: Residential Development

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S2.2	Kim Goodwin	General	Oppose	Poorly located for housing. Ten minutes to anywhere therefore the sections will not be desirable compared to better located sections available in Hastings, Havelock and Napier. Very little interest from current members in moving here. To compare this with Millbrook or Jack's Point is completely unrealistic. The sections will eventually sell and there will be turnover because of their location giving cashflow to the club. Will their value go up or down. In Australia in the poorly located areas the houses are deteriorating, and the value is not rising. Developers will lose because the sections will take years to sell possibly being needed to be discounted and the club will lose because golf course will become in the short term a building site and in the long term a ruined golfing experience.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S2.2	Accept S2.2
S7.2	Peter Steers	General	Oppose	Properties proposed will out of reach for most New Zealanders.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S7.2	Accept S7.2
S54.3	Mathew Perry (Golf in New Zealand)	General	Support	Hawke's Bay has a known housing shortage, as identified in the 2021 Housing Development Capacity Assessment.
S56.1	Temple Martin	General	Oppose	Oppose the number of residences proposed. That the number of dwellings be reduced.
S57.2	Gerald Chisum	General	Oppose	I oppose the re-zoning to establish multiple dwellings. Our own land has a requirement to remain 10-acre blocks.
S58.3	Jan Chisum	General	Oppose	What about the result of the 2007 Environment Court decision that threw out the application of the proposed development of the Hawke's Bay Golf Course, saying that it should never have got past the Council - totally going beyond the District Council plans in so many ways, as this new proposal also does? In saying that is the Millbrook of the North Island is a total falsehood which any local can see.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S58.3	Accept S58.3
S66.3	Greg Reynolds	General	Oppose	Does the following comment mean there is more to the redevelopment than has been documented in the Plan? "Insert a Structure Plan into the District Plan to guide future development of the HGLP". Can this open a pathway for future developments not covered in the Plan?
S67.1	Peter Holley	General	Oppose	The location of the proposed sub-division is not suitable for a satellite residential development. It is located in a rural productive area, adjacent to an active Aerodrome Authority and serviced by a busy country road. The proposed sub-division is located close to Hawkes Bay Regional

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				Prison, well established farming enterprises and the burgeoning Irongate industrial development. There is poor connectivity and community support (schools, libraries, regular public transport and refuse collection). Retail opportunities are few and far between. The sub-division is for the sole benefit of the developers with little value accretion to the broader community or the city of Hastings.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S67.1	Accept S67.1
S68.1	Victor & Heather Saywell	General	Support	We support this carefully planned and sensible plan change and the proposed residential development.
S80.3	Trevor Robinson	General	Support	The careful and professional design work underlying PC7 will provide an additional 170 high quality residential buildings with no adverse effects on the golfing experience. That additional residential capacity will help fill a hole in the realisable residential capacity provided in Hastings District compared to the requirements of the National Policy Statement for Urban Development 2020. (Refer the analysis provided by PC7's proponents in their first response to the Council's request for further information dated 2 April 2024).
S85.1	Bruce Govenlock	General	Oppose	The applicant seeks to create an inappropriate new rural urban residential interface within the Plains Zone. The proposed new residential village of up to 170 dwellings will bound three high noise producing activities - Hastings Aerodrome to the west, Hawkes Bay Equestrian Park to the north, and the Hawkes Bay Car Club to the south. All three of these sites have valid concerns about reverse sensitivity effects and future noise and activity complaints from the location of this development. The applicant proposes the use of no complaint covenants on the dwelling titles to muzzle the future residents as a mitigation solution, but a no complaint covenant does not avoid, remedy or mitigate a problem. It seeks to remove the rights of future residents instead. In Ngatarawa Development Trust and others vs HDC in declining a similar residential golf course development on the neighbouring Hawkes Bay golf course Justice Thompson noted that the use of no complaints covenants is not an alternative for good planning.
S86.1	Ross Drew	General	Oppose	Approx. 20 years ago the Environment Court ruled against a very similar proposed housing development by the Hawkes Bay Golf club. The Environment court ruled the housing development would have a significant impact on the operation of the airfield. One would assume the Environment court would rule in a similar fashion again. Changes to the Plan would be against the existing ruling from the Environment Court. There is no need for the housing development in this location. It is a 5-minute drive from Hastings and a 10-minute drive from Havelock North to the golf club.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S86.1	Accept S86.1
S88.2	Eruera Morrison, John Newton, Edline Morrison & Maria Newton	General	Oppose	Housing Affordability and Gentrification (meaning whereby the character of a poor urban area is changed by wealthier people moving in, improving housing and attracting new businesses, often displacing current inhabitants in the process) Bridge Pā is a close-knit community, but this development threatens to increase land values, rates and house prices, pushing out Māori whānau who have lived here for generations.
FS1, FS2, FS3, FS4,	- HB Car Club - Ashley Willan - Drew Macdonald		Support S88.2	Accept S88.2

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
FS5, FS7	- Mark Baker - Nathan Tough - Aaron Young			
S96.4	Raelyn Oliver	General	Oppose	During Cyclone Gabrielle we noticed lakes where some of the dwellings are planned. Is PC7 going to give the HB Car Club, HB Deerstarkers and the aerodrome the right to apply for a Sport and Recreation Zone and have housing built? My recreation is gardening and a couple of more houses would fit if everyone else is doing it.

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Topic 6: Impact on Hawke’s Bay Car Club

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S3.1 S4.1 S6.1 S11.1 S22.1 S30.1 S60.1 S69.1 S70.1 S71.1 S72.1 S73.1 S74.1 S93.1 S94.1	Gregory Hook Aiden Hoffman Jayne Millar Matt Green Brett Paton Donna Elder Nathan Tough Ross Lawrence (Matipou Orchard Ltd) Circe Hoffman Peter Cadwallader Murray Wilson Mark Graham MG Ravenscroft Anna Murray Jonathan Bissell	General	Oppose	<p>The Hawkes Bay Car Club has been promoting motorsport, driver education, and road safety since 1947. HBCC's base, the Jack Young Motorsport Park, has been a hub for motorsport activities for over 60 years. We provide a controlled environment for young drivers to develop essential driving skills through programs like Motorkhana, which foster safe driving habits and discipline, and Autocross, combining those skills with speed in a safe environment. Beyond motorsport, the club contributes to the community. During Cyclone Gabrielle, HBCC's facilities were used to store and distribute essential supplies. HBCC's grounds are also regularly used by local Girl Guides for camping and outdoor education.</p> <p>Concerns Regarding Plan Change 7</p> <ul style="list-style-type: none"> <li>• Noise Considerations: Motorsport activities inherently generate noise, and new residential development in proximity could lead to noise complaints, threatening HBCC's long-standing operations.</li> <li>• Impact on Junior Programs: HBCC's junior driver training and development programs could be jeopardized if noise complaints or restrictions limit HBCC's ability to operate.</li> <li>• Financial Sustainability: The club relies on track access to generate income through events, memberships, and sponsorships. Losing access would threaten HBCC's viability and limit motorsport opportunities in the region.</li> </ul> <p>To protect HBCC's ability to continue operating, we request that reverse sensitivity covenants or similar be placed on any new residential properties in the proposed development. This would acknowledge HBCC's long-standing presence and ensure new residents cannot seek restrictions on club operations due to noise concerns.</p> <p>The Hawke's Bay Car Club has played a vital role in motorsport, youth development, and community support for over 70 years. We urge the Hastings District Council to ensure this development does not threaten HBCC's ability to continue operating. No one wants to see another situation like Te Mata Mushrooms, where a long-standing business was forced out due to new residential development encroaching on its operations.</p> <p>Require Reverse Sensitivity Covenants</p>
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S3.1, S4.1, S6.1, S11.1, S22.1, S28.1, S30.1, S60.1, S69.1, S70.1, S71.1, S72.1, S73.1, S74.1, S93.1, S94.1	Accept S3.1, S4.1, S6.1, S11.1, S22.1, S28.1, S30.1, S60.1, S69.1, S70.1, S71.1, S72.1, S73.1, S74.1, S93.1, S94.1
S5.1	Steven Waerea	General	Oppose	Oppose housing development due to car club noise upsetting residents long term.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S5.1	Accept S5.1

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S28.1	Grant Blackberry	General	Oppose	Oppose the building of housing in a recreation area. Hawkes Bay Car Club could be potentially stopped from running events in relation to excessive noise. The Hawkes Bay Car Club has run events on these grounds for 50 years and this development could affect events from going ahead.
S78.2	Noel Martin-Smith	General	Oppose	<p>The basis for this opposition is that residential development could pose a very real threat to the activities of the HB Car Club. There are several instances where existing activities have been adversely impacted by residential developments being allowed to occur near established activities. There is a case in the Golden Downs area of the Tasman District where an individual converted an ex community hall into a residence and subsequently complained vociferously about noise from two gun clubs located on either side of his 'residence' and a forestry operation to the rear. Locally there is the case of the "Quest" hotel being built in the Hastings CBD and subsequent complaints from guests about 'loud' music from the nearby "The Common Room" resulting in the venue having to curtail a core part of its business. Te Mata Mushrooms which had been operating on its site for over fifty years was forced to close because of complaints around smell from residents of recently built residences. The HB Car Club has two sources of income:- 1. An annual subscription from members. 2. Any profits from events that it organises. The Club has two options for running events:- 1. The use of closed public roads 2. The use of the Club's own property. In recent years the expansion of residential areas into rural areas and damage from Cyclone Gabrielle has precluded the use of some of these roads for our events. By far the major source of income for the Club in recent years has been derived from organising a round of the NZ Rally Championship. Out of deference to the local residents and in recognition that a number of them have suffered a huge amount of disruption as a result of Gabrielle the Club has not organised the event for the last two years and made the decision to not organise it in 2025. As a consequence, the Club has suffered a very significant loss of revenue. All these impediments to the continued use of public roads for HB Car Club events make it imperative that the Club can continue to use its own property and facilities to carry out its core function in the future. Income from annual subscriptions alone cannot sustain the economic viability of the Club. Any restrictions imposed on the Club's activities as a result of complaints from residents of the proposed residential development would very likely result in the Club having no option other than winding up. In the event of this happening there would be no other opportunity for those interested in car competitions to participate on a local level. It would also make it very difficult for those aspiring to race at a national or international level to obtain the requisite racing licences since there are no other Motorsport NZ affiliated clubs in this area.</p> <p>The sole reason for my objection to the application for the Plan Change is to protect the interests of the HB Car Club. This could be achieved by way of some form of no complaints covenant or reverse sensitivity covenant being included in any new development enabled under the Private Plan Change. In the event of covenants (or other legally binding mechanism that protects the activities of the HB Car Club) being made a condition of the Private Plan Change then I would withdraw my objection to the requested Plan Change.</p> <p>Request Reverse Sensitivity Covenants</p>
FS1, FS2, FS3, FS4, FS5, FS7	<ul style="list-style-type: none"> <li>- HB Car Club</li> <li>- Ashley Willan</li> <li>- Drew Macdonald</li> <li>- Mark Baker</li> <li>- Nathan Tough</li> <li>- Aaron Young</li> </ul>		Support S78.2	Accept S78.2
S79.1	Hawke's Bay Car Club	General	Oppose	While we acknowledge the potential benefits of the proposed development, we are concerned about the absence of any reference to the HBCC in the documentation, particularly concerning noise considerations. As one of the applicant's closest neighbours, we have a cordial relationship with the golf course and would like to support future development where possible. However, we are concerned about the potential consequences of encroachment, particularly for activities that generate noise. Our club, along with the Hawke's Bay Large Scale Radio

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				<p>Controlled Speedway and the Hawke's Bay Racing Lawn Mowers, has a long-standing presence in this area, and noise management has always been a priority. However, New Zealand history has shown that when residential encroachment occurs, pressure mounts on existing facilities to limit their activities.</p> <p>Impact on Junior Development Programs</p> <p>A core aspect of our mission is to provide a safe, controlled environment for young drivers. Our junior championship, particularly through Motorkhana, plays a crucial role in teaching car control, discipline, and safety. These programs introduce young drivers to motorsport and safer driving habits, making a positive contribution to the community.</p> <p>Financial Sustainability</p> <p>Access to our club tracks is crucial for our financial sustainability. Restrictions on their use would significantly impact our ability to generate income through events, memberships, and sponsorships. Without this revenue, we would struggle to maintain our facilities and continue providing opportunities for motorsport enthusiasts.</p> <p>The HBCC has been an integral part of the community for over seven decades, promoting safe driving and youth development. We urge the Hastings District Council to implement measures within its power to ensure the proposed development can coexist harmoniously with our longstanding motorsport activities. If this is not possible, we reiterate, we cannot support the application. We do not want to see a repeat of situations like Te Mata Mushrooms, where longstanding assets have faced pressure from new residential developments and ultimately had to cease operations.</p> <p>Request for Reverse Sensitivity Covenants Following discussions with your planning team and legal advice, we understand that "No complaints" or "Reverse Sensitivity" covenants cannot be requested as part of this District Plan change. However, we believe long-term protections should be established to preserve the rights of neighbours to conduct activities uninterrupted, as they have historically been entitled to do. Without such protections in place, we cannot support the application.</p>
<p><b>FS1,</b> <b>FS2,</b> <b>FS3,</b> <b>FS4,</b> <b>FSS,</b> <b>FS7</b></p>	<p>- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young</p>		<p>Support S79.1</p>	<p>Accept S79.1</p>

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Topic 7: Impact on Hastings / Bridge Pā Aerodrome

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S5.2	Steven Waerea	General	Oppose	Oppose housing development due to airport noise upsetting residents long term.
S7.1	Peter Steers	General	Oppose	The noise complaints due to the proximity of the airfield will restrict aircraft movements and encroach on flight paths into the airfield.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S7.1	Accept S7.1
S8.1	Livia Hurst	General	Oppose	Oppose the entire application to rezone as a member of the aerodrome.
S9.1	Will Brougham	General	Oppose	Hastings Aerodrome has operated for over 90 years since 1932. Important General Aviation hub for the region, as operating General Aviation aircraft from nearby Napier Airport is more costly and restrictive. The airfield is home to numerous locally owned businesses. Acts as important emergency disaster asset as shown in Cyclone Gabrielle. New residents will inevitably file noise complaints. Airfield operations could be impacted by new residents. Development should not go ahead if it is going to restrict aircraft movements at Hastings Aerodrome and should not be prioritised over the vital role that the airfield plays.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S9.1	Accept S9.1
S10.1	Thomas Hornblow	General	Oppose	Oppose as it encroaches on the aerodrome and its users.
S13.1	Nicola Curran	General	Oppose	Aero Club has been there for many years and provides both recreational flying and the academy provides training for students to become pilots. Putting residential dwellings beside or at the end of a runway is asking for trouble. The residents will complain about the planes taking off and landing and the Aero Club will suffer even though the Aero Club was there first. This residential build should not be allowed to proceed near the airport.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S13.1	Accept S13.1
S14.1	Martyn Curran	General	Oppose	This is too close to the Hawkes Bay Aerodrome and the runway itself. The Hawkes Bay Aerodrome has become one of the best in the country and their operation needs to be considered.
S15.1	Maxwell Roy Dixon	General	Oppose	Some years ago, another developer tried to get a plan change to build houses off the northern end of the aerodrome. This was met with huge opposition. Now we have the same thing proposed again. This is a long-established aerodrome (since before 1928). It is ideally placed as an emergency aerodrome in the event of a major disaster, as with Cyclone Gabrielle, and would be sorely missed if its operations became restricted.

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				The idea of building high density housing so close to a busy aerodrome is ridiculous. There will be complaints about noise etc. This is what happened at Ardmore and Paraparaumu some years ago.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S15.1	Accept S15.1
S16.1	Malcolm Belcher	General	Oppose	The Airfield adjacent to the golf club is an active airfield and used as a second airfield for the region, especially as an emergency airfield. There will noise complaints whatever covenants are put in place.
S17.1	Sarah Harper	General	Oppose	Housing development and amendment to Section 25.1 Noise would seriously impact the aero club and flying school. There would be complaints about noise. Should be well informed about the flight school and aero club or not to build housing next to the aero club and school at all. There are many businesses and the air cadets and it would seriously impact the futures of many people.
S18.1	Nigel Hammond	General	Oppose	This will have a negative impact to the aero club, flying school and any other business located at Hastings Aerodrome. It has been seen many times before when housing is suddenly located next to commercial land/ infrastructure and eventually the commercial business will lose their consent to work or operate and either close their business or relocate as it becomes a problem to the new residents. There has been an operational airfield since 1929 and this needs to remain for the future of Hastings and Hawkes Bay without any residential developments in the area.
S19.6	Dr Corinna Proehl	General	Oppose	Potential of conflict. Planes and helicopters starting and landing. The Mushroom Farm and Sale Yards had complaints about the smell etc. The new residents then expect existing activities to move as they find them annoying.
S20.1	Bruce Sutherland	General	Oppose	It doesn't matter what expert report you get regarding noise. It is never a good idea to build residential housing next to an airfield even with conditions. Building at the end of an approach and take off runway is a major safety issue.
S23.1	Mads Slivsgaard	General	Oppose	Should not build directly under the approach to Runway 29 at Hastings Aerodrome. The eastern circuit used by glider traffic and tow planes. This approach is preferred by helicopters to separate from fixed wing traffic, which uses the western circuit and is used in strong westerly winds by fixed wing aircraft, when landing on main runway is not possible. As a pilot I know from experience how difficult this manoeuvre is without buildings below to worry about. The strategically important Hastings Aerodrome must be protected at all cost as shown by the recent cyclone. No other aerodrome in Hawkes Bay can accommodate such a rescue operation. Many venues around the country have been closed or heavily restricted in operations due noise complaints and other types of complaints. Many of these venues were in the area before development. I have no faith that the measures written into the proposal will protect Hastings Aerodrome in the future.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S23.1	Accept S23.1
S24.1	Brad Stone	General	Oppose	A significant risk to the ongoing operations of the Flying Club. The club provides critical general aviation services, aviation infrastructure, emergency services, flight training, and recreational flying opportunities. Any development that jeopardizes its operations

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				could have wider consequences for the aviation community and the local economy. Increased likelihood of noise complaints and operational restrictions, which could threaten the long-term viability of the aerodrome. Noise-sensitive land uses have historically led to pressure for flight restrictions in similar cases, impacting pilots, students, and aviation businesses.
S31.1	Warrick Frogley	General	Oppose	<p>The proposed changes pose a direct threat to the ongoing operations, future viability, and safety of the aerodrome, which is an essential asset for the local community, aviation sector, and emergency response efforts.</p> <p>Safety and Operational Concerns - As a current helicopter owner and operator, I regularly use the Eastern Helicopter arrival and departure route over the golf course to safely transition to and from the aerodrome. This established flight path is crucial for avoiding built-up areas and residential housing, thus ensuring safe operations, especially during high-traffic periods throughout the day. Urban expansion onto the boundary of the aerodrome would inevitably lead to noise complaints from new residents. This could severely disrupt the current flight operations, hinder safe helicopter arrivals and departures, and create ongoing tensions between the aviation community and urban dwellers. This would compromise safety and operational efficiency for all aircraft using the aerodrome.</p> <p>Generational Ties to the Aero Club and Community - My grandfather, father, myself, and my son have all been past or present members of the club. This rich family history underscores how integral the aerodrome is, not only to my own professional development but to the broader community's aviation heritage. The aerodrome is a hub for learning, training, and recreation, and it must be protected for future generations.</p> <p>Critical Role in Civil Defence Operations - The aerodrome is also a vital infrastructure asset, as demonstrated during the catastrophic events of Cyclone Gabrielle. It served as a key base for civil defence operations, facilitating rescue, relief, and coordination efforts when other means of transport and communication were severely disrupted. The need for a functional, accessible aerodrome in times of disaster is paramount, and development would restrict this essential service. The aerodrome's ability to support emergency operations must not be compromised by urban encroachment.</p> <p>The Aero Club and aerodrome has been a cornerstone of aviation training, emergency services, and recreation for decades. The proposed development puts at risk the safety of those who rely on the aerodrome for training, business, and emergency response. The urbanisation of surrounding areas would create ongoing noise and safety concerns, drastically reducing the aerodrome's functionality and operational capacity.</p> <p>The aerodrome and the aeroclub are vital community assets that must be preserved, not only for the current aviation community but for future generations. The aerodrome needs to be safeguarded in the interests of public safety, community legacy, and operational integrity.</p>
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S31.1	Accept S31.1
S32.1	Colin Woollard	General	Oppose	<p>Keep operations, access and training to the only suitable alternative to Napier Airport for civil emergencies like Cyclone Gabrielle. There is a high westerly component in our Hawkes Bay wind at times. The 11/29 Group 5/6 cross runway cannot be closed, shortened or moved. Light aero planes and use the e-w runway circuit when there is a higher crosswind. It is used extensively for safe operation and training of rotary and some fixed wing operations. The airport provides daytime and night flying access, which is limited to realistic hours, but aviation still makes noise and night flying can only be learned in the dark. Going ahead with this proposal is putting people in danger, by living so close under the flightpath of an important community asset, some will complain. The</p>

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				aerodrome is also a backup for the Hastings Regional Hospital. Civil emergency asset severely restricted in operations by complaining owners. The district cannot afford to lose the operations and access of this most important asset, as recently witnessed with Gabrielle.
S33.1	Margaret Broad	General	Oppose	This rural location is not suitable for urban encroachment and will severely impact the local Aerodrome. Residents likely to complain about airplane or helicopter engine noise. Reminiscent of new Havelock North residents complaining about the Mushroom Farm odour during easterlies which had been there for decades. This Aerodrome is more important to Hawkes Bay than a possible golf destination or lifestyle. Aerodrome, Trainee pilots live & train there. Their flight paths might upset residents. Civil Defense and Rescue Helicopter uses it as a base e.g. Cyclone Gabrielle. If extra buildings are permitted on the Hastings Golf Course, I'm afraid for the future of this historic and essential Aerodrome.
S34.1	Francine Toki	General	Oppose	Puts the Gliding Training program, gliding club and rescue services at risk. During the Cyclone the Aerodrome was instrumental in helping us deliver supplies and generators etc. Always best to plan and have emergency facilities available. Costs to the region and community will far outweigh any benefits to the golf club.
S35.1	Sophie Blokker	General	Oppose	Oppose due to safety of pilots and aerodrome operations. Due to weather changes or forced landing occurrences it is paramount to have Runway 29/11 available with no restrictions. If there was an unfortunate accident on final approach, several houses would be in direct danger of being affected.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S35.1	Accept S35.1
S36.1	Brendon Gorringer	General	Oppose	Will negatively impact the Hastings Aerodrome, which has been serving the community since 1932. Cyclone Gabrielle showed how significant it is to the community. Reducing and limiting its current and future functionality is very short sighted. The Hastings Aerodrome reaches far into the community with flight training and recreational flying benefitting more than just the individuals. Limiting and reducing any existing organisation that has been functioning for decades for a minority is not part of the community spirit.
S37.1	John Managh	General	Oppose	Flight safety on take-off to the east will be compromised in the event of engine failure. Landing from the east will lead to noise concerns from residents compromising use of eastern approach when for flight safety such an approach should be used. To land to the west on the aerodrome requires a low approach to land touch down late on the runway. Risks being unable to stop on the available runway.
S38.1	David Mitchell	General	Oppose	The introduction of residences close to an aerodrome has historically led to negative outcomes for the aerodrome. The Aerodrome provides several important services to the area. It is a hub for many of our district's agricultural activities. It was a vital base of operations during Cyclone Gabrielle emergency response. It operates a busy flight school at which many domestic and international students study to become pilots - a source of benefit to the local economy. Should residential buildings be constructed near the aerodrome the same thing could happen here as has happened numerous times at other aerodromes. Noise complaints have led to adjustments to aircraft operations (adjustments that can compromise safety of flight) and to the outright closure of aerodromes. The proposal demonstrates that the Hastings Aerodrome is operating within its noise requirements, and to introduce new development is likely to challenge this and request further changes in the future setting the district up for trouble.
S39.1	Bruce Mactaggart	General	Oppose	Residential development would severely and adversely affect the ongoing use and future development of the Hastings Aerodrome which is a critical community asset and which provides vital civil defence services, supports agriculture and supports young people through flight

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				training and Air Cadets whilst creating many local employment opportunities. This key piece of regional infrastructure can NOT be relocated whereas there are many other locations in the region that could accommodate residential living. The proposed development must be rejected but if it is to be considered in any way then it should have covenants in place where purchasers, in perpetuity, acknowledge they are aware of the airport and undertake to make no noise, nuisance or similar complaints.
S40.1	Michael Flemming	General	Oppose	Even where residential neighbours of district airfields are aware of the potential noise factor of an airfield, and think they can live with it, they can become intolerant over time. This has led to complaints. This airfield is busy and strategic to the district and country.
S42.1	Tom Harper	General	Oppose	The plan change poses a risk to the daily operation of the aero club and its long-term future.
S43.1	Paul Bevin	General	Oppose	<p>A noise logger was used to get an idea of current noise but was only over a 10-day period. Given the diverse nature of aviation the noise levels will differ with different aircraft and changing activities as our local area develops. I have seen over the years that people do not like aircraft operating close to residential areas irrespective of noise levels and do not see this being any different if a residential area was created by the golf club, given that the approach path to runway 29 is over the housing area propose.</p> <p>Covenants can be put in place that do not allow people to complain, however the threat to the airfield operations would remain if they were to be challenged in the future as being unreasonable.</p> <p>In the event of an aircraft having an engine failure while using runways 29/11 there will be the chance that the aircraft could end up crashing into residential housing.</p> <p>The reason that the airfield can operate without undue interference is that it complies with the existing planning standards. These standards make it very clear that residential development is not an approved activity. The future of Bridge Pā airfield, apart from the current recreational and business activities, is very likely to be developed as a viable alternative to Napier airport, so that it can meet the requirements of the support required in the event of a civil emergency. Napier airport is particularly vulnerable to Tsunami and earthquake damage leaving Hastings airport the only access by air into our district. Whilst no plans have been drawn up to enhance our civil defence capabilities that I am aware of, there is good reason for the operators of the airfield to explore the opportunities for this to happen. If Bridge Pā was to become a civil defence base then it is obvious that heavy aircraft would likely be involved and that they would operate 24hrs a day if necessary.</p>
S44.1	David Palmer	General	Oppose	Intensification will create significant hazard to aircraft operating on the cross vector 11 - 29. Engine failure at take-off does occur, and landing in a built-up area leaves little hope for survival and risk of injury and death to those on the ground. Although the east - west facing runway is less frequently used than the north - south facing runway, it is used when a westerly wind has picked up during flight. Residents have unrealistic ideas around noise levels next to aerodromes and complaints will no doubt be made. The development also leaves no room for runway extension should the need arise. The aerodrome has proven itself to be a critical piece of infrastructure and is the only aerodrome outside Napier in the area to have JetA1 fuel in case of emergency or act of hostility.
FS1, FS2, FS3, FS4, FS5, FS7	- HB Car Club - Ashley Willan - Drew Macdonald - Mark Baker - Nathan Tough - Aaron Young		Support S44.1	Accept S44.1
S45.1	Guy Dever	General	Oppose	As a private helicopter operator, I oppose a residential development in the vicinity of the airdrome.
S46.1	Terry Smith	General	Oppose	Small airfields around New Zealand come under increasing pressure as communities expand outwards making their position unviable due to

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				<p>noise complaints etc resulting in night curfews, restricted hours of operation which can lead to the closure of the airfield. This no doubt will happen if the above development goes ahead.</p> <p>During Cyclone Gabrielle, the Bridge Pā airfield played a major role with support to the ongoing rescue operation. This asset should therefore be recognised as a critical piece of infrastructure for the greater Hawke's Bay and be protected. Established on this airfield are many buildings including our club house, aircraft maintenance facilities, aircraft hangars both privately owned as well as commercially owned. If this airfield was too close, then the nearest suitable airfield would be Waipukurau as Napier Commercial Airport as it stands is not available to the type of aviation operations currently carried out at Bridge Pā airfield i.e. pilot training and general recreational flying. It is a major asset to Hastings.</p>
S47.1	Brian Mackie	General	Oppose	<p>Hawke's Bay has an enviable position when it comes to aviation, because it has two choices for its commercial aviation hub: the present regional airport at Napier and the Hastings aerodrome. The closure of Napier airport either through sea level rise or a catastrophe such as tsunami or merely an earthquake damaging the airport, it is clear that the approval for any development affecting the expansion of Hastings aerodrome will be a serious strategic mistake which damages the interests of everyone living in Napier, Hastings and the wider Hawke's Bay region. Napier airport is seriously vulnerable to a natural disaster. The Hastings aerodrome played an important role during the Cyclone Gabrielle rescue and recovery. The aerodrome is an important and safe strategic asset that must be protected. Due to topography Hastings aerodrome is the only viable place to develop an alternative regional airport for Hawke's Bay. It has existing infrastructure that can be expanded. It has enough space to allow for two runways suitable for regional-type airliners, given the loss of some surrounding land - most of which is currently underdeveloped. The proposed housing development would reduce the community's potential unrealised value of Hastings aerodrome to nil. When the disaster arrives and destroys Napier airport the community will need an alternative location and the cost of creating a new hub at Bridge Pā will be astronomical, if entire neighbourhoods must then be cleared. It is never a good idea to permit medium to large residential developments anywhere near airports, no matter how small the airport is. They always invite disputes from residents and, more importantly, introduce needless safety hazards. Hastings aerodrome is fortunate, in that it has limited residential development nearby – but even that has given rise to complaints from people about aircraft noise. The airfield is a matter of strategic importance to the entire Hawke's Bay region and decision makers need to take a far longer-term view for when the need arises to build a new regional air hub for the Bay.</p>
FS1, FS2, FS3, FS4, FS5, FS7	<ul style="list-style-type: none"> <li>- HB Car Club</li> <li>- Ashley Willan</li> <li>- Drew Macdonald</li> <li>- Mark Baker</li> <li>- Nathan Tough</li> <li>- Aaron Young</li> </ul>		Support S47.1	Accept S47.1
S48.1	Hamish Ross	General	Oppose	<p>The negative effects this will have on the continued operation and development of the Hastings Aerodrome. The Hastings Aerodrome is a permitted activity and a district transportation asset. The 11/29 runway approach and departure fans pass over the Golf Club property with associated noise and possible safety implications. The helicopter eastern arrival and departure tracks pass over the Golf Club property at heights of 600 feet or below. The 01/19 helicopter, glider and tow plane circuit pass over the Golf Club property. The current two golf courses provide a buffer between aerodrome activities and residential areas. The introduction of a dense residential subdivision next door would defeat this protection. There are real concerns of noise and reverse sensitivity issues which may restrict the continued operation and development of the Hastings Aerodrome.</p>
S49.1	Philip Lowe	General	Oppose	<p>Construction of residential dwellings right next to an aerodrome is a bad idea for multiple reasons.</p>

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				<p>1. If an engine goes out and we need a place to land quickly, houses aren't the best target.</p> <p>2. Noise. A few months ago there was an incident where an upset person at a nearby funeral walked up the runway to a plane landing on the runway and abused them till the engine was shut off mid runway. Expect more incidents with more people around.</p> <p>3. Noise is the reason for constant restriction and outright banning of all sorts of activities. Take the gocart track near Fern Hill/Omahu for example. Buckets are not allowed to race there any more due to noise. The next closest track for Hawkes Bay is in Taupo or Palmy.</p> <p>4. People might view the house and think the noise isn't that bad while viewing but after moving in they want the noise to stop at any cost.</p>
S50.1	Jason Kelly	General	Oppose	<p>Safety: The gliding circuits are on the eastern side of the runway and intensive development in this area increase the risks by reducing landing options.</p> <p>Noise Considerations: Aircraft activities inherently generate noise and new residential development in proximity, despite any covenants, would inevitably lead to noise complaints, threatening the club's long-standing operations.</p> <p>Impact on Junior Programs: The club's junior training development programs could be jeopardised if noise complaints or restrictions limit the club's ability to operate.</p> <p>Financial Sustainability: The club relies on unfettered use of Hastings Aerodrome to generate income through memberships and operations. Losing access would threaten the club's viability and limit gliding opportunities in the region.</p> <p>Constraints on the future use of the aerodrome generally: especially in emergencies, will be detrimental to the entire Hawkes Bay region.</p>
FS1, FS2, FS3, FS4, FS5, FS7	<ul style="list-style-type: none"> <li>- HB Car Club</li> <li>- Ashley Willan</li> <li>- Drew Macdonald</li> <li>- Mark Baker</li> <li>- Nathan Tough</li> <li>- Aaron Young</li> </ul>		Support S50.1	Accept S50.1
S51.1	Gavin & Avon Grimmer	General	Oppose	<p>Similar application to build houses on an adjacent property besides this airport was squashed by the Environment Court just a few years back. The Environment Court in their wisdom considered it would cause undue and unfair restrictions to be placed on the airport activities. Cyclone Gabrielle and the 1931 Earthquake taught us that the adjoining property of the Hawkes Bay &amp; East Coast Aero Club must be protected at all costs due to the important strategic need of this base to exist without restrictions. This airfield was proven to be the only viable means of access in and out of Hawkes Bay in both emergencies. Allowing houses to be built so close to such a vital airfield will lead to complaining about the noise and therefore cause restrictions, or even closure to be placed on operations and placing houses in areas of danger in case of engine failures of aircraft taking off and landing. The much-needed Civil Defence activities could be put at risk for golf. Have observed several times flooding throughout the neighbourhood, yet the Aerodrome was still able to operate due to the unique free drainage of the soils the airfield is on, making this the best place for an airfield to be.</p>
S52.1	Ian Sowman	General	Oppose	<p>The development would adversely affect the continued use of the aerodrome which is a strategically important asset for the Heretaunga region. Its value to the public cannot be overstated as recently witnessed by the Cyclone Gabrielle emergency when Hawkes Bay Napier Airport was unable to operate due to flooding. In an emergency RNZAF operate their large C-130 Hercules aircraft and helicopters from the aerodrome. Any imposition that impinges on the future 100% uninhibited operation of the aerodrome (within CAA regulations and guidelines) must not be allowed.</p>
S53.1	Kathy Perry	General	Oppose	<p>The Aerodrome was very important to the whole of Hawkes Bay during Cyclone Gabrielle. It is also used by helicopters during grape season for frost protection. The helicopters come in to refuel at different times during the night. I know the application has said there will be a "no</p>

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				complaint clause" but I can't see how that will stand when there is a tournament on at the golf club and complaints are made about any aircraft noise.
S55.1	Peter Ashcroft	General	Oppose	Hastings airfield has a high proportion of daytime/nighttime training flights involving continuous circuit training. Despite assurances to the contrary, experience at other airfields show that noise complaints will inevitably arise when new housing is developed near airfield boundaries especially take-off and landing areas. The availability for Hastings to be a civil emergency flight centre for both fixed wing and helicopter operations should not be compromised.
S57.1	Gerald Chisum	General	Oppose	The airfield is surrounded largely by two golf courses and current aviation-friendly inhabitants. New residents immediately adjacent to the runway approach and departure paths will complain bitterly of the overflights. Hush-proof glass will not always be battened down. I have seen numerous airfields gobbled up by nearby housing developments and worry the same fate for ours. The recent cyclone showed the need for our airfield as a base for rescue operations when Napier's was unavailable. Any restrictions on our operations may cause a damper on medical and relief work. Golfers will lobby for restrictions on noise and operating hours that will reduce the utilisation markedly. The airfield is necessary as an alternate to Napier in times of need. Our airfield has participated in disaster relief on numerous occasions through history. The training at our club requires day and night capability. A qualified pilot can be quickly assimilated into the military in times of crises or war.
S58.1	Jan Chisum	General	Oppose	This airfield has been here for 93 years during which time it has not only trained pilots who without exception signed up to fly in WW2 but have been involved in searches for lost folk, flown supplies to flood-stricken families and was a huge factor in the recovery of hundreds of people and animals in the recent Cyclone Gabrielle. These are just some examples of the public service to members of not only our community but those up and down the East Coast over the years. It might be said that the Golf Course is a sports facility but so is the airfield as along with these lifesaving situations, there are many members who either fly Club aircraft or their own (or syndicated) aircraft in a recreational way. Despite any covenants, it is a right to complain about anything, not the least of which would be aircraft noises as they often fly at 'inconvenient' times where triple or even quadruple glazing would have no effect since many people move to Hawke's Bay for the climate so enjoying a BBQ outside throughout the summer months provides no protection against late evening aerial activity. Helicopters mainly use the East/West low-level approaches to mitigate interference with the fixed winged normal patterns so this would irritate any residents of the proposed housing. Bridge Pā Airfield has been recognised as imperative to Civil Defence during disasters as well found out during Cyclone Gabrielle when even Napier Airport was deemed unsuitable as an aerial rescue base due to the lack of proven access to the major hospital in Hastings. The RNZAF Helicopters and their crews moved to Bridge Pā very quickly and we know that C130s can operate out of here. It has happened all over the Western world (including NZ) that airfields have been impacted by housing developments that have encroached their boundaries and have either had them totally closed or had their movements severely restricted. We are not a densely populated country as many of them are so please let our 'out of the way from built up areas' airfield remain unimpeded.
S64.1	Glenn Riddell	General	Oppose	I oppose the building of a residential development in proximity to an airfield, because of the reserve sensitivity that it will create. As well as the safety issues created by having the approach fan over a residential area.
S65.1	Joe Faram	General	Oppose	As commercial heli operator based on the Bridge Pā airfield.
S67.2	Peter Holley	General	Oppose	The Bridge Pā Aerodrome has strategic and emergency response credentials. Other than rotary aircraft there is considerable fixed wing activity which needs to be considered in the context of urban development. The HB Gliding Club also makes extensive use of a right-hand base for runway 01. This involves the movement of tug aircraft and gliders who often make low level approaches in the proximity of the proposed subdivision.

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				The Aerodrome is a significant asset with considerable growth potential. It is not simply fostering the aims of General Aviation but also has demonstrable long-term connectivity with the rest of New Zealand. It is imperative that this asset be given the planning direction foresight and protection to ensure it can deliver now and into the future. Crowding out is simply not an option.
S76.1	Sean Husheer	General	Oppose	I operate aircraft for forest survey and conservation work from Hastings Aerodrome. Some of the flights require early morning departures and are likely to raise complaints when operating of runway 29. I also was involved in delivering critical supplies during Cyclone Gabrielle. The existence of Hastings Aerodrome undoubtedly saved lives during Gabrielle. It is critical that its existence is secured. High density housing threatens its existence and Plan Change 7 should be declined.
S80.4	Trevor Robinson	General	Support	The use of a modified golf course design also provides a buffer, insulating the site's neighbours from the effects of a new residential community in their midst. PC7's proponents have identified the relevance of potential reverse sensitivity effects on the adjacent Aerodrome, and have proposed a package of measures to ensure that this is not a serious issue. I note the decision of the Environment Court in Winstone Aggregates and Others v Matamata-Piako District Council (W55/2004 at paragraph [4]) confirming that unjustified complaints (or the prospect thereof) should not be considered as giving rise to a reverse sensitivity effect. Based on Marshall Day's report supporting the PC7 proposal, my submission is that provided the Aerodrome complies with its own consent requirements, complaints from new residents would be unjustified. PC7's proponents have sought to preclude even that low level risk, however, by their commitment to 'no complaint' covenants. For completeness, I submit that the Aerodrome cannot protect itself against the consequences of actions in breach of its own consent requirements.
S81.1	Gliding Hawke's Bay & Waipukurau Inc.	General	Oppose	Gliding Hawkes Bay & Waipukurau Inc. has been a part of the region since 1957, promoting gliding, training pilots and supporting recreational aviation in general. Beyond gliding, the club contributes to the community with an active junior training program, Air Training Corps (ATC) flights, supporting other community organisations by donating trial flights, e.g. Waimarama Surf Life Saving, Breast Cancer Research etc and with club facilities used as required to support police and other organisations in their operations. This proposal directly straddles the approach to runway 29 and is underneath all our gliding circuits for take-off and landings. Gliding circuits include standard gliders, motor gliders and towplanes. Any constraints on the future use of the aerodrome generally and for use as a Civil Defence base during emergencies will negatively affect the region. The airfield was shown to be critically required infrastructure in the aftermath of Cyclone Gabrielle. <ul style="list-style-type: none"> <li>• Safety: The gliding circuits are on the eastern side of the runway and intensive development in this area increase the risks by reducing landing options.</li> <li>• Noise Considerations: Aircraft activities inherently generate noise and new residential development in proximity, despite any covenants, would inevitably lead to noise complaints, threatening the club's long-standing operations.</li> <li>• Impact on Junior Programs: The club's junior training development programs could be jeopardised if noise complaints or restrictions limit the club's ability to operate.</li> <li>• Financial Sustainability: The club relies on unfettered use of Hastings Aerodrome to generate income through memberships and operations. Losing access would threaten the club's viability and limit gliding opportunities in the region.</li> <li>• Constraints on the future use of the aerodrome generally: especially in emergencies, will be detrimental to the entire Hawkes Bay region.</li> </ul>
S82.1	Hawke's Bay & East Coast Aero Club	General	Oppose	PC7 threatens the spatial protection of the aerodrome's present and future capabilities and use which are of significant benefit to the region's communities. HBECAC has operated from the aerodrome since 1932. The HBECAC is an Airport Authority by Order in Council and has the powers conferred on local authorities under section 3 of the Airport Authorities Act 1966. The Club has expanded its runway capabilities by purchasing land to the north, south and west of the aerodrome to

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				<p>extend runways. It has actively protected the approaches to the aerodrome runways by gazetting height and residential restrictions on land under the 01-19 approaches (which are to the north and south of the Club's land) and by incorporating runway approach height restriction fans on runway 11-29 (Appendix 35, Map 2). There is also a NSZ6805 noise map in the Hastings District Plan (Appendix 35, Map 1). The Aerodrome has a total of 54 hangar buildings and 100 resident aircraft. A Heli operations area was established on the eastern end of the runway bordering the Hastings Golf Course boundary in 2023. The Aerodrome is a major sport and recreational hub with 302 members. It provides a commercial flight training school and is a venue for national sporting events. It is a base for air ambulance operations and military and civil defence operations, including deployment following Cyclone Gabrielle. Commercial helicopter heavy lift, firefighting, and agricultural operations are based at the Aerodrome. In total, the Aerodrome generates 40,000 aircraft movements annually (more than Napier Airport). The Hastings Aerodrome shares a 1.3km boundary with the Hastings Golf Club property (the land proposed to be rezoned by the plan change). Runway approaches and flight paths lay directly over the Hastings Golf Course.</p> <p>The development contemplated by the PC7 will have potential safety and reverse sensitivity effects which cannot be mitigated. The eastern end of existing runway 11-29 abuts the boundary of the Golf Club. Any extension of the runway or the access road to it will require the acquisition of land from the Hastings Golf Club and would push the height protection fans for the runway further east (i.e., lower over the Golf Course). Approval of the plan change will not preserve the extension capability for runway 11-29 or protect the future capability of the aerodrome.</p> <p>The Hasting Aerodrome is recognised as a district transportation asset and a regional Civil Defence asset. The Hawke's Bay CDEM Lifeline Plan identified the Hastings Aerodrome as the backup to Napier Airport in the event of tsunami, inundation or earthquake affecting the Napier Airport. The Aerodrome was the base for first responders in three significant Hawke's Bay civil defence emergencies – the Napier earthquake in 1931, the Hawke's Bay floods in 1938, and the Cyclone Gabrielle floods in February 2023. The recommendations resulting from the Independent Review of the HB CDEM Response to Cyclone Gabrielle emphasised the need to improve and implement resilience strategies and CDEM response partnerships with lifeline utilities. The Aero Club has been working closely with HB CDEM and Hastings District Council to recognise, protect and increase the capacity of the Hastings Aerodrome to assist in an emergency. Preserving the clear flight path of the main Heliport approach/departure fan to the east over the Hastings Golf Course is a key part of this planning and capability, especially for heavy lift and sling load cargo operations. During Gabrielle and the extended aftermath operations the Aerodrome had very large Blackhawk, Airbus and RNZAF NH90 helicopters with loads using this pathway. Traditionally airports have been built on rural areas outside of towns to allow for clear unobstructed runway approaches and provide a noise buffer zone for the activity away from residential areas. Residential encroachment close to airports causes conflict between traditional airport use and new residents' expectations about noise and generates complaints about low flights over residential development. The best solution is to maintain an existing buffer zone and keep runway approaches clear of residential housing. Hastings Aerodrome at Bridge Pā has such a buffer currently and it should be preserved as good practice planning. The applicant's proposal contemplates a cluster of up to 170 residential units beneath a busy flight circuit area directly under a low-level runway approach used by helicopters, often with sling loads. The proposed residential development will lead to complaints of noise and aircraft proximity. The use of no complaint covenants does not avoid, remedy or mitigate those effects (see Ngatarawa Development Trust &amp; Ors v Hastings District Council). The helicopter operations area is at the eastern end of runway 11-29 bordering the Hastings Golf Course. All commercial helicopter operations use the eastern approach and departure over the Golf Course. For safe air traffic separation, the helicopters must operate between ground and 600 ft max height as they depart and arrive over the Golf Course. During CDEM deployments such as Cyclone Gabrielle</p>

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				<p>the eastern end of the 11-29 sealed runway is used as the cargo staging area for helicopter sling loads, some of which can hang up to 30m below the helicopter. It is inappropriate from a safety perspective to have high density houses in this location under the approach path. The height protection fan for Runway 11-29 in the District Plan passes directly over the Plan Change’s proposed houses. This fan allows an aircraft operating within safety margins down to a height of 35 metres descending to 17 metres as it passes over the proposed residential housing which includes two storey buildings. The height of aircraft in this location is likely to attract noise complaints, particularly for night and early morning operations such as frost fighting, agricultural operations and nighttime rescue helicopter training. The acoustic report from Marshall Day Acoustics which assesses the position of noise boundaries and likelihood of reverse sensitivity noise complaints from the residential area of the proposed development makes several incorrect assumptions that seriously undermine and invalidate its conclusions. For example, Marshall Day’s estimates of the proportions of helicopters using runways 01-19 and 11-29 are incorrect. Further, the Marshall Day report is based on a narrow study window (14 days from 8-23 September 2023) when: helicopter traffic from the aerodrome was much reduced due to the severely reduced agricultural helicopter work throughout the District following Cyclone Gabrielle; and the 11-29 runway over the Golf Course was not used by fixed wing traffic due to the prevailing winds at the time. Since then, the Aerodrome has relocated the base of an existing major helicopter operator on the aerodrome from the southwest boundary near Bridge Pā village to the eastern boundary with the Hastings Golf Course to a location accessing the eastern helicopter approach and departure fan. This has improved aerodrome operational separation, reduced noise for the community of Bridge Pā village, is consistent with the Heretaunga Plains Urban Development Strategy’s vision for marae-based residential development in Bridge Pā village, but has increased the noise potential in the approach and departure fan over the Golf Course. If Hastings Aerodrome were to be restricted in its current or future operations because of the development proposal contemplated by the Plan Change, there is no other suitable location in the District or Region upon which it could be relocated or replicated. By comparison, there are many alternative locations for apartment style/residential developments that will not compromise the efficient and effective operation of the regionally significant aviation infrastructure that is the Hastings Aerodrome.</p>
S84.1	Don Ryder	General	Oppose	<p>As was evidenced during the Cyclone Gabrielle event, the ability of this privately owned Aero Club to provide essential services to the community and the Defence Force was instrumental in helping with massive relief efforts. We saw similar things happening in Kaikoura with the earthquake down there. Over the many years of my involvement with aviation, I have seen too many examples of housing developments that have been approved too closely to smaller aerodromes, which in following years have then resulted in noise complaints from the new occupants (or more likely the second owners of the properties after re-sale) which have then resulted in ongoing disagreements and legal disputes that frequently end up curtailing the operations of the aerodrome and the resident Aero Clubs. If this proposal is allowed to proceed it would begin a long process of conflict and disagreement. I submit that we must protect this valuable infrastructure asset – not just for recreational flyers, but for the whole of the Hawke’s Bay community.</p>
S85.3	Bruce Govenlock	General	Oppose	<p>The applicants state that this development could not be duplicated elsewhere. In fact, a new golf course and new urban residential apartment style dwellings could be established anywhere with appropriate landscaping and a suitably sized parcel of land. An airport on the other hand is subject to numerous planning, activity-residential interface, and flight path and obstacle restrictions. If Hastings aerodrome were to close or be restricted in its current or future operations because of this development, there is no other suitable location in the region to replicate it. An important asset that is operated for public good will be curtailed for a private residential property development. The Hastings Aerodrome has planning tools and protections within the District Plan. These include the Appendix 35 noise map and runway fan height protection maps. Notably the promulgated runway 11-29 approach and departure fans and associated height</p>

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				protection fans extend over the golf course property and bisect the proposed dwelling cluster. Speaking as a pilot who has flown from Hastings Aerodrome for some years and used the approach and departure to the east of the runway 11-29 over the golf course land, the proposed site is not an appropriate location for high density residential dwellings from the perspective of aircraft noise, runway clearways, aircraft height, and ensuing reverse sensitivity issues. The Hastings Aerodrome is a recognised regionally important asset for Civil Defence, transportation and recreational activities. The Cyclone Gabrielle CDEM aerial response conducted from the aerodrome for 2 months highlighted the immense value of the aerodrome to the community and its vital role when Napier Airport capability is reduced in an emergency. The eastern aerodrome approaches over the golf course land are a vital part of the aerodrome emergency capability and functionality and must be protected and preserved.
S86.2	Ross Drew	General	Oppose	<p>The housing development will have a major impact on the operation of the Bridge Pā airfield. It would be expected that the golf club residents would eventually demand the closure of the airfield.</p> <p>The airfield is a significant resource for the local community at little or no cost to the tax and rate payers. The Aerodrome is a major sport and recreational hub with 302 members. It provides a commercial flight training school and is a venue for national sporting events. The Aerodrome has a total of 54 hangar buildings and 100 resident aircraft. I have a hanger on the airfield. It is the major centre of recreational flying and aviation sports in Hawkes Bay. There is little recreational flying at Napier airport due to the commercial nature of the airfield.</p> <p>The airfield is a significant strategic resource for the local community. The airfield played a significant role in the Cyclone Gabrielle response. The private helicopters stationed at the airfield did many of the rescues on the first day of the floods. A lot of people owe their lives to these helicopter rescues. We will get rid of these helicopter operations from the neighbouring airfield to enable a small hand full of developers to make some money. The airfield has always played a major part in all local disasters/emergencies over the last nearly 100 years.</p> <p>Hawkes Bay generates a lot of wealth from the local horticultural &amp; agricultural industry. The airfield provides a base for the local helicopter operators that provide agricultural services to the local industry. Clearly there will be noise complaints when the helicopters are operating in the early hours of the morning doing frost protection work.</p>
S87.1	Stephanie Eilers	General	Oppose	<p>The aerodrome abuts the western boundary of the Hastings Golf Course and has two runways North / South orientation (01/19) and East West orientation (11/29). The aerodrome is owned by the Hawke's Bay and East Coast Aeroclub and is base to the club with more than 300 flying members, a recreational gliding club, a large commercial flying academy with both international and domestic students, an aircraft maintenance base, a helicopter Agri services base, a commercial helicopter company and is home to over 50 privately owned aircraft. Aircraft types based on the aerodrome include gliders, single and twin-engine fixed wing aircraft and single and twin-engine helicopters. The aerodrome is used by a wide range of visiting aircraft including jets. The helicopter base, being particularly noisy and with their east/west departure arrival path designation is based on the eastern boundary adjacent to 11/29 bordering the Hastings Golf Course, away from the main operations of the fixed wing bases and away from the Flaxmere facing boundary and away from the Bridge Pā community. Night flying circuit training activities take place year-round. Frost fighting work gives rise to helicopters coming and going re-fueling and hovering though the night and early morning. Emergency services helicopter and civil defence operations and training use the aerodrome at night. Runway 11/29 flight path cuts directly across the Hastings Golf Course grounds above the club house and proposed 170 residential development. It is used by general aircraft easterly and westerly winds prevail. Helicopters arrive and depart east/west for approach and departures as standard procedure and under 600'. Helicopter circuits also are flown under 600' and operate in opposite circuit to the general traffic 01/19 pattern and so fly directly over the golf course. The aerodrome is by nature very noisy. The 2023 ten-day window of recording by Marshall Day in their Noise Assessment is too small a sampling to have any relevance. Looking</p>

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				<p>at the wind direction from the 8th September through to the 23rd September 2023 (I'm assuming September is correct as the actual logging data summary on the Marshall Day report has October dates listed), aircraft would have been using 01/19 runway apart from perhaps 13th September. Notably the dates that were excluded from the logging data due to wind were those where runway 29 would have been used. Ultimately, the data logging window is so small it is not at all representative of typical. Fixed wing and helicopter traffic fly directly over the golf course and proposed residential development creating not only noise but also nuisance due the low altitude of aircraft on approach and departure using 11/29 and helicopter flying in circuit.</p> <p>One of the principal objectives of the Aero Club since its inception in 1929 has been to assist the Government, Local Bodies and the community and citizens generally whenever practicable. Regularly through the years the club has provided emergency response by way of rescue and relief. In the 1931 earthquake response the Aerodrome was used as the base of operations by the New Zealand Permanent Air Force. The NZPAF officially took control of operations of the Aerodrome, with Club planes and pilots working together with the NZPAF directing rescue and relief operations, ensuring regular mail communications, providing medical transport and surveying land and property damage. In the 1938 floods where again Napier was isolated, the Aeroclub spearheaded rescue and relief operations until Squadron Leader Burrell arrived to take charge of flying operations and Judge Harvey ran the ground operation on behalf of the Ministry of Defense. Throughout the decades the Club and aircraft have continued to be a lifeline during natural disaster and search and rescue events. Notably again during the 2023 cyclone, the Aerodrome shut down normal operations to transform the Aerodrome to a civil emergency base of operation (Napier isolated again). Rescue work, flood survivor triaging, supply relief work, survey work. The operations lasted for two months. Granting PC7 and its associated residential proposal jeopardizes these current and future activities of the Aerodrome. The probable curtailing of the community vital Aerodrome activities to be weighed against development of 170 residential dwellings. There is no stated necessity for these dwellings to be built on the Hastings Golf Course. The proposal is a "nice to have". What to do if an aircraft engine fails on takeoff is part of standard training for pilots? Pilots are made very aware by CAA that the turn to final on approach is a manoeuvre featuring most frequently in circuit accident statistics. Wind shear and turbulence on the landing approach can lead to loss of aircraft control. Objects, trees and buildings can create turbulent conditions up to 10 x the height of the wind object according to Australian Government Guidance material on Building-Induced Wake Effects at Airports. It is preferable to have clear approach and departure paths around airfields. "No complaints" covenants and consents are a weak mitigation instrument for reverse sensitivity effects. These instruments do not prevent complaints and are contested in court. They do not generally consider future development and changes of the activities of the effects producing entity. A council may or may not be willing to act against a reverse sensitivity complainant. Political will is needed, and the perception of a bad public image (not listening to an individual's complaint regarding loss of enjoyment of their land or in this case the potential of complaints from a substantial group of affected individuals) will come in to play as will the question of the council's spending of ratepayer's money on court action. Likely any fight to uphold the covenant will be left the Aero Club. That will be very costly with no guaranteed positive outcome.</p>
S90.1	Brian Salisbury	General	Oppose	Oppose as Long-term Hawks Bay and East coast Aeroclub member.
S91.1	Aircraft Owners and Pilots Association of New Zealand	General	Oppose	<p>Importance of Hastings Aerodrome as a Regional Asset – The Aerodrome has been operational since 1932 and is a vital infrastructure asset for both recreational and commercial aviation. The aerodrome has served as a regional base for air ambulance operations, as well as military and civil defence activities. The Aerodrome plays a critical role as an emergency asset and serves as a strategic backup for Napier Airport.</p> <p>Operational Concerns - The proposed residential development would place up to 170 dwellings under active flight paths. A particular concern is the proximity of these proposed dwellings to the Helicopter East/West Arrival and Departure procedures. These procedures are crucial for</p>

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				<p>heavy-lift cargo transport, agricultural services, and emergency operations. It is essential that these approaches remain free of obstructions. Development could lead to reverse sensitivity issues, undermining the safety and efficiency of aerodrome operations.</p> <p>Section 317 of the Property Law Act (PLA) allows the High Court to modify or extinguish land covenants under the following circumstances:</p> <ul style="list-style-type: none"> <li>• Changes in the nature or extent of the use of the benefited land, burdened land, or both.</li> <li>• Changes in the character of the neighbourhood.</li> <li>• Any other circumstance the court deems relevant.</li> <li>• Continuation of the covenant would impede reasonable use of the burdened land in ways unforeseen by the original parties.</li> <li>• Agreement by all involved parties for modification or extinguishment, or evidence of abandonment or waiver of rights.</li> <li>• The modification or extinguishment will not cause substantial harm.</li> <li>• The covenant is in conflict with public policy or law.</li> <li>• Any other reasons deemed just and equitable by the court.</li> </ul> <p>These provisions demonstrate that covenants under section 317 are not automatically permanent and may be subject to modification or extinguishment through legal challenges.</p> <p>Case Law Demonstrating Covenant Modifications: Synlait Milk Ltd v New Zealand Industrial Park Ltd (2020, Supreme Court), Chand v Auckland Council (2021, Court of Appeal), Sigaporia v Auckland Council (2022, High Court). These cases highlight instances where land covenants were contested and overturned, reinforcing that covenants are subject to legal challenges.</p> <p>Potential Challenges to the Aerodrome’s Covenant Protection - For the Aerodrome, legal intervention under section 317 would likely arise after complaints and bureaucratic involvement, such as: acoustic measurements and reports, scrutiny of the aerodrome’s operations, including noise contours, low-flying complaints, concerns over leaded avgas, EFATO (Engine Failure After Take-Off) limitations, and more. The costs to defend the aerodrome in such proceedings could be substantial, potentially reaching hundreds of thousands of dollars. This raises concerns about the affordability of such a defence for the aerodrome.</p> <p>Summary of Risks to the Aerodrome - While section 317 of the PLA provides some legal protection through land covenants, the following risks persist for the aerodrome:</p> <ol style="list-style-type: none"> <li>1. Noise Complaints: The aerodrome could face noise complaints, which would need to be resolved at considerable time and cost.</li> <li>2. Perception of Legal Breaches: There is a risk that legal aviation activities, such as training exercises, could be perceived as breaches of Civil Aviation Rules or District Plan Rules.</li> <li>3. Reverse Sensitivity: The development of new subdivisions near the aerodrome increases the risk of reverse sensitivity claims, potentially resulting in legal or operational restrictions.</li> <li>4. Increased Safety Risk: The proximity of new subdivisions raises the risk to persons and property, as aviation activities near residential areas may increase the likelihood of accidents.</li> <li>5. Compliance Costs: The aerodrome could be required to prove compliance with noise contours and other regulatory controls. The financial burden of proving compliance, which has not been questioned until now, could be significant.</li> <li>6. Recent Case Specific Example: A similar situation occurred at Omaka Aerodrome, where a subdivision was built directly adjacent to the aerodrome and given the aerodrome’s opposition to its presence, a covenant was placed on the sections. Despite this, the aerodrome operator now receives noise complaints from the subdivision.</li> </ol> <p>Conclusion: Granting PC7 and allowing the development presents a significant risk to the continued operation of the Aerodrome. Even with legally binding protections under section 317 of the PLA, the risks outlined above demonstrate that the aerodrome’s operations are vulnerable to legal challenges, noise complaints, and increased scrutiny, all of which could jeopardize its ongoing viability.</p>

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S95.1	Hawke's Bay Microflight Club Inc.	General	Oppose	PC7 threatens the present and future capabilities of the aerodrome which significantly benefits the region. The aerodrome shares a 1.3km boundary with the golf club and runway 11-29 take off and approach flight paths are directly over the golf course. The aerodrome has approximately 40,000 aircraft movements per year (more than Napier Airport) including commercial jet, flight training, helicopter, air ambulance, military, civil defence, aerial survey, gliding, recreational fixed wing and gyrocopter operations. Residential encroachment causes conflict regarding low flying aircraft and noise. The current buffer the aerodrome has should be preserved.
S96.5	Raelyn Oliver	General	Oppose	How long before the complaints start concerning the aerodrome noise and they want the aerodrome gone?

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Topic 8: Infrastructure Impacts

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S12.1	Nicholas Bell	General	Oppose	Oppose the planned expansion in full, as it is profiteering on part of the golf course and will negatively impact the already stressed local infrastructure.
S19.1	Dr Corinna Proehl	General	Oppose	Attracting another lot of aging population. Hastings needs people who are young or middle aged and prepared to work to increase the wealth of the district and help the industries. The health system are already overwhelmed with the aging population and their increased health needs. Living further away from health facilities will stretch ambulances, district nurses etc even more. GP's and hospice services will be struggling to do home visits.  It will change to character of the area and existing residents will feel like "outsiders", being confronted with affluent new neighbours. Conflict is pre-programmed.
S56.2	Temple Martin	General	Oppose	Oppose the proposed location of the wastewater treatment plant, positioned on the southwestern boundary. While this has been located with consideration to the proposed residences, this shows no consideration to my existing property, this being the closest residential dwelling to the proposed location of the plant.  That the wastewater treatment plant be located away from the southwestern boundary.
S57.3	Gerald Chisum	General	Oppose	At times the water table recedes to cause dry wells. Where will the water and sewer come from if 170 houses are active?
S58.2	Jan Chisum	General	Oppose	It seems incredible that water restrictions are in place in what is considered a not normal, quite wet summer (although millions of cubic metres of water can be given to international companies to take water to bottle and send overseas) so how can so many more high-end houses be water accommodated when crops are at risk through lack of it? What about the sewage when it is incredibly expensive for private individuals?
S61.3	Hawke's Bay Golf Club	General	Oppose	Water Management and Runoff Concerns: The Heretaunga Plains are critical in terms of water management, as the land plays a role in groundwater recharge, as well as filtering and managing rainwater runoff. Converting this area into recreational land with the addition of proposed Residential and Short-term Accommodation could change how the land absorbs and drains water. Increased impervious surfaces (such as roads, parking lots, and buildings) would likely exacerbate stormwater runoff, leading to higher risks of flooding and soil erosion, potentially degrading water quality in nearby rivers and streams.
S62.4	Korongata Marae	General	Support in part	Pressure on local council infrastructure and rates. Ngati Pōporo has the following key recommendations to ensure cultural values are respected: 1. Establish a long term permanent working relationship with Ngati Pōporo, including consultation on naming and design. 2. Integrate cultural values into the development design and ensure ongoing cultural awareness initiatives. 3. Minimize environmental impacts and ensure robust management of waterways and wetlands. 4. Include Ngati Pōporo in decisions regarding community integration and benefit-sharing.
S66.2	Greg Reynolds	General	Oppose	"Future potable and firefighting water supplies for all facilities on Site will be via the existing Hastings District Council owned 200mm PVC watermain located in Maraekakaho Road". Can HDC confirm it has approved this? "Further details in the proposed water supply, including normal water demand calculations and peak demand management options, are set out in the Infrastructure Report provided in Appendix K". From Appendix K the Plan proposes to use the existing HDC watermain with 4 options – 3 to address any shortfalls associated with the current supply and a fourth that does not need to address any shortfalls based on a proposed upgrade by HDC to the watermain in the future. None of the 4 options are approved. An email from HDC was attached (Attachment 4) that states "we can make this work" but there are several options, and "we are still in the process of seeking further

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				information and are awaiting their response on a number of matters". An article earlier this year on RNZ (reference in original submission) implies that it is unlikely HB councils will allow more water to be taken. My consensus is that this matter is not resolved. It needs to be resolved for the housing development to take place. Relying on an email from a council staff member looks a bit light to me.
<b>S96.3</b>	Raelyn Oliver	General	Oppose	We had a few years that we and Bridge Pā had trouble getting water. The water level was so low due to HBRC allowing excess irrigation. Is there a guarantee all these dwellings are not going to do the same to us. The wastewater treatment plant for that amount of dwellings worries me. It has been put far away from the dwellings but close to ours, the HB Car Club and the aerodrome.

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Topic 9: Traffic Impacts

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S19.4	Dr Corinna Proehl	General	Oppose	Increased traffic and more congestion at peak times. The roads in and out Hastings are already full at peak times and this will makes matters worse. A Lifestyle Community will expect a high standard of roads. We are trying to reduce the traffic around Hastings, not increase it.
S53.3	Kathy Perry	General	Oppose	Numerous trucks and heavy machinery coming and going and the extra traffic on Maraekakaho Road. I think the referenced traffic count is outdated as there have been many new houses built out Maraekakaho way and even further with numerous farms having subdivided pieces of land off. The entrance/exit to the golf club is between two blind corners. There have been near misses and cars going through fences near the entrance. Cars pull out of the exit going at slow speeds and the volume of cars would be huge with the amount of people living/staying there.
S59.2	Laura Kamau	General	Support in part	How will the applicant ensure traffic safety of a residential road given the bends getting into the proposed development have about 20 metre visibility on a 100k zone? The current behaviour is to sit and wait in the middle of the road even though there is a waiting bay. Council resources are always tagged for outside of our community yet our road is a vital organ to the Hawkes Bay economy and the council has made rules for the road without the basics of what the district plan notes (arterial route based on urban zoning) Currently there is a ratio of 4000 vehicles coming from Maraekakaho through Bridge Pā before 8am. That's almost quarter of those who use the expressway daily. That the ratable value of our properties be kept within the context of our community and not the surrounds. Our community was the 'reserve swamplands' and a 120 year promise of building a township. This has yet to come to fruition. That the beautification of our community be included in the resource consent and that the applicant must have community driven design and infrastructure in place to help with these services. That the golfing community support and give back to Bridge Pā. That Bridge Pā do not wish for more of a rich man's playground while they have their primary residence elsewhere.
S62.3	Korongata Marae	General	Support in part	Increased traffic and potential safety risks. Ngati Pōporo has the following key recommendations to ensure cultural values are respected: 1. Establish a long term permanent working relationship with Ngati Pōporo, including consultation on naming and design. 2. Integrate cultural values into the development design and ensure ongoing cultural awareness initiatives. 3. Minimize environmental impacts and ensure robust management of waterways and wetlands. 4. Include Ngati Pōporo in decisions regarding community integration and benefit-sharing.

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Topic 10: Cultural Impacts

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S59.1	Laura Kamau	General	Support in part	<p>I'm submitting on behalf of my family who have lived in Bridge Pā for over seven generations on our ancestral property. Parts of which were seized by both the Crown and Council. The golf course was a part of my grandfather's estate and was taken for the purposes of preparing for war. It was a major chunk of our cattle farm and the area was used mainly by Māori of Hastings to learn how to play and a place for political exchange. This Plan Change and impacts on Bridge Pā zoning are a result of 'carelessness' taken by the County and now Council to continue to layer zones mainly for 'recreational use' for people outside our low decile socio economically deprived community. Currently if you look at the impacts of zoning in the pā these changes always limit the opportunity for my family to develop our land and to build our papakāinga.</p> <p>How does the applicant affect the cultural values in their application?</p> <p>That the ratable value of our properties be kept within the context of our community and not the surrounds. Our community was the 'reserve swamplands' and a 120 year promise of building a township. This has yet to come to fruition. That the beautification of our community be included in the resource consent and that the applicant must have community driven design and infrastructure in place to help with these services. That the golfing community support and give back to Bridge Pā. That Bridge Pā do not wish for more of a rich man's playground while they have their primary residence elsewhere.</p>
S62.1	Korongata Marae	General	Support in part	<ol style="list-style-type: none"> <li>1. Economic benefits for the Bridge Pā community and wider region</li> <li>2. Opportunities to restore wetland areas and native flora</li> <li>3. Enhanced reconnection with whenua (land) for Ngati Pōporo</li> <li>4. Reduced reliance on groundwater abstraction through treated wastewater reuse</li> </ol> <p>Ngati Pōporo acknowledges the project's potential benefits above but emphasizes that its success hinges on the adoption of proposed mitigations and the respectful inclusion of cultural values. They expect Golf Sport Development Ltd Partnership (GSDLP) and subsequent stakeholders to work collaboratively with Ngati Pōporo to address concerns and ensure positive outcomes for all parties.</p> <p>Cultural Impacts:</p> <ul style="list-style-type: none"> <li>• Impacts on Ngati Pōporo ability to exercise kaitiakitanga over the site and resources.</li> <li>• Possible damage to unrecorded wahi tapu during earthworks and construction.</li> <li>• Concerns about misuse of place names without proper consultation.</li> </ul> <p>Ngati Pōporo has the following key recommendations to ensure cultural values are respected:</p> <ol style="list-style-type: none"> <li>1. Establish a long term permanent working relationship with Ngati Pōporo, including consultation on naming and design.</li> <li>2. Integrate cultural values into the development design and ensure ongoing cultural awareness initiatives.</li> <li>3. Minimize environmental impacts and ensure robust management of waterways and wetlands.</li> <li>4. Include Ngati Pōporo in decisions regarding community integration and benefit-sharing.</li> </ol>
S88.1	Eruera Morrison, John Newton, Edline Morrison & Maria Newton	General	Oppose	<p>As residents of the Bridge Pā settlement we all formally oppose the District Plan Change 7. We have very deep concerns about the negative impacts that this proposal will have on our Māori community, our whenua, and our way of life.</p> <p>This whenua holds deep significance to mana whenua. The proposed rezoning will disrupt the cultural and historical integrity of the area, with potential impacts on wāhi tapu and traditional kaitiakitanga practices.</p>

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Topic 11: Noise, Light, Air and Aquifer Pollution Effects

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S53.2	Kathy Perry	General	Oppose	The noise from the construction of these buildings is going to be ongoing for years. The noise from this construction will most definitely be heard from Valentine Road and we live out here for the lifestyle. It would be intolerable putting up with the noise and traffic.
S59.3	Laura Kamau	General	Support in part	<p>How will the applicant mitigate the noise from increase construction? We already have to contend with the commercial interest of the aerodrome and their lack of adhering to their resource consent or completing their resource consent. Increase in light in a rural zone. We already see the city lights of the prison. Back to noise, we already contend with a car club who block off roads and make a lot of dust. Air pollution from the quarrying and construction. Again we have a pottery nearby that fires their kilns that travel and sit heavy in the air.</p> <p>Construction on a fragile aquifer. Puncturing the aquifer as a result of building has this been considered?</p> <p>That the ratable value of our properties be kept within the context of our community and not the surrounds. Our community was the 'reserve swamplands' and a 120 year promise of building a township. This has yet to come to fruition. That the beautification of our community be included in the resource consent and that the applicant must have community driven design and infrastructure in place to help with these services. That the golfing community support and give back to Bridge Pā. That Bridge Pā do not wish for more of a rich man's playground while they have their primary residence elsewhere.</p>
S61.4	Hawke's Bay Golf Club	General	Oppose	A zone change for the development of sports and recreation facilities and proposed Residential Housing and Short-term accommodation Development, could lead to increased traffic and pollution in the surrounding area. Not only would this exacerbate local air quality issues, but the expansion of infrastructure may increase the use of energy-intensive materials and contribute further to environmental degradation. Preserving the natural green space in the Heretaunga Plains is critical for maintaining healthy air quality in the region.
S96.2	Raelyn Oliver	General	Oppose	Construction will take years which means the noise of trucks and vehicles will be for years. Then the traffic of occupants forever – so much for a country road.

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Topic 12: Landscape and Visual Effects

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S59.6	Laura Kamau	General	Support in part	Landscaping and visual effects. Trees obstructing the landscape. Trees must be kept low as it impacts on the visual enjoyment of my property. That the ratable value of our properties be kept within the context of our community and not the surrounds. Our community was the 'reserve swamplands' and a 120 year promise of building a township. This has yet to come to fruition. That the beautification of our community be included in the resource consent and that the applicant must have community driven design and infrastructure in place to help with these services. That the golfing community support and give back to Bridge Pā. That Bridge Pā do not wish for more of a rich man's playground while they have their primary residence elsewhere.
S62.5	Korongata Marae	General	Support in part	Aesthetic concerns about how the development fits with the cultural and natural character of the area. Ngati Pōporo has the following key recommendations to ensure cultural values are respected: 1. Establish a long term permanent working relationship with Ngati Pōporo, including consultation on naming and design. 2. Integrate cultural values into the development design and ensure ongoing cultural awareness initiatives. 3. Minimize environmental impacts and ensure robust management of waterways and wetlands. 4. Include Ngati Pōporo in decisions regarding community integration and benefit-sharing.
S96.1	Raelyn Oliver	General	Oppose	We bought our block 51 years ago to be in the country. If this goes ahead, we are going to be looking at a village of units, flats, two story dwelling and storage facilities.

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Topic 13: Ecological and Biodiversity Effects

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S61.1	Hawke's Bay Golf Club	General	Oppose	<p>Our primary concern lies in the significant environmental impacts that this change would have on the local ecosystem and the surrounding environment. The Heretaunga Plains is a critically important area, not only for its agricultural productivity but also for its ecological value. We believe that converting this land to Sport &amp; Active Recreation zoning and the proposed Residential Housing and Short-term Accommodation Development would result in several negative environmental consequences.</p> <p>Loss of Valuable Green Space and Habitat: The Heretaunga Plains are home to various natural ecosystems, supporting local wildlife, plant species, and wetlands that are vital to maintaining the region's biodiversity. The proposed zoning change could lead to land-use alterations that threaten these ecosystems. Developing recreational facilities, Residential Housing and Short-term Accommodation or infrastructure on the site could disrupt existing habitats, leading to a loss of biodiversity and diminishing the natural value of the area.</p> <p>Impact on Climate Resilience: Natural green spaces such as those in the Heretaunga Plains act as carbon sinks, helping to absorb carbon dioxide and mitigate climate change. By converting these areas into built-up zones for recreational and residential purposes, we would reduce the local area's ability to mitigate the impacts of climate change. This is especially concerning when considering the urgency of preserving our environment and fostering climate resilience.</p> <p>Sustainability of Long-Term Environmental Impact: It is crucial to consider the long-term effects of this proposed zone change on the environment. Even if the immediate development may seem relatively small-scale. The additional proposed Residential Housing and Short-term Accommodation Development numbering 134 dwellings, the long-term environmental degradation caused by building infrastructure, altering landscapes, and the eventual need for more facilities could lead to irreversible damage. It is essential that the council considers more sustainable, ecologically responsible alternatives.</p> <p>While we acknowledge the desire to increase recreational facilities in the district, we firmly believe, that this proposed zone change from Heretaunga Plains to Sport &amp; Active Recreation and proposed Residential and Short-term Accommodation, presents significant environmental risks. The loss of critical agricultural land, the threat to biodiversity, changes in water management, and the long-term environmental consequences make this proposal unwise and unsustainable.</p>
FS6	- Gourmet Blueberries Ltd		Support S61.1	Accept S61.1
S62.2	Korongata Marae	General	Support in part	<p>Potential impacts on waterways and wetlands, including loss of mauri and wairua of water resources.</p> <p>Minimize environmental impacts and ensure robust management of waterways and wetlands.</p>
S97.2	Cape Kidnappers Station Limited	General	Support	We support the work this project is doing with mana whenua, its commitment to native planting, and working to established a better ecological outcome for the wider property.

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Topic 14: Impacts for Firefighting Water Supply and Emergency Access

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S92.1	FENZ	PREC1-P8 PREC1-R8 PREC1-R9 PREC1-R11 PREC1-R12 PREC1-R13 PREC1-S13 30.1.7Z	Amend	<p>Fire and Emergency requires an adequate accessible water supply to be available for firefighting activities. The Structure Plan identifies a range of development areas including a residential area with capacity for approximately 170 dwellings in the form of apartments and detached houses. The PC7 area does not currently benefit from an available connection to the Council's reticulated water network. The PC7 request is supported by an Infrastructure Report which has assessed the feasibility of servicing the future residential development of the site. The report sets out a range of potable water supply options based on a range of possible future scenarios, all of which have given due consideration to firefighting demands. As PC7 is currently drafted, the eventual potable water servicing option would be deferred until a subsequent resource consent and/or subdivision consent application(s) for the residential areas. As such, it is essential that the proposed objectives, policies, rules and performance standards for the proposed SARZ/HGLP direct future developers to deliver a compliant firefighting water supply. Fire and Emergency has some concerns regarding the robustness of the proposed rule provisions of the new Zone/Precinct in ensuring that adequate firefighting water supply is provided. Amendments to some of the proposed provisions are therefore sought to provide an adequate rule framework which will provide for the health, safety and wellbeing of future residents of the Precinct, and the wider community, and therefore achieves the purpose of the RMA. Adequate capacity and pressure for the eventual servicing of the Precinct can be determined through the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice).</p> <p>Fire and Emergency seeks the following amendments to PC7 to ensure that the District Plan secures an adequate firefighting water supply for the eventual residential development of the HGLP: • Amendments to HGLP Policy PREC1-P8 to make explicit reference to the need to provide for firefighting water supply. • Amendments to HGLP Standard PREC1-S13: – to ensure that permitted residential and visitor land use activities within the Precinct (PREC1-R8, R9 and R12) are required to demonstrate an available connection to the public reticulated water supply network; and, – to specifically reference firefighting water supply and the relevant Code of Practice for determining an adequate supply. • The inclusion of an additional Matters of Discretion for restricted discretionary activities under proposed rules PREC1-R8, R9, R11, R12 and R13 to ensure that the consequences of non-compliance with permitted activity servicing infrastructure is appropriately assessed. • Amendments to the HGLP General Site Performance Standards and Terms 30.1.7Z which confirms that: – Each site shall be connected to Council's reticulated water network, with capacity which includes firefighting water demand. – Where subdivision occurs in advance of a connection to the Council's reticulated water supply upgrades, the subdivider shall be required to demonstrate how the lots will provide Fire and Emergency will access to an alternative firefighting water supply. – Each site shall have shall make provision for emergency service access and egress.</p>
S92.2	FENZ	HGLP Rules HGLP Standards	Amend	<p>The Structure Plan and Primary Road Cross Sections drawing provide an illustration of the proposed internal roading network and road widths. PC7 states that the proposed primary and secondary roads (serving more than six dwellings) have been reviewed to confirm emergency vehicle access, which is welcomed and supported by Fire and Emergency. To ensure that the eventual development delivers a roading layout which is accessible to appliances, it is essential that the proposed new Zone/Precinct rules and standards secure suitable road widths.</p> <p>Proposed HGLP Standard PREC1-S1 requires activities to be carried out in a manner that "ensures all aspects of the HGLP Structure Plan can be implemented as outlined, including infrastructure services and roading..." With respect to the proposed HGLP subdivision performance standards, which is likely to be more relevant for the development of roading infrastructure, 30.1.7Z requires: i. The subdivision of land to be</p>

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Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
				<p>generally in accordance with the HGLP Structure Plan. It is unclear whether this standard also requires the subdivision of land to be in general accordance with the HGLP Primary Road Cross Sections drawing. There are also no other subdivision standards which stipulate the minimum road widths for the internal roading layout within the Precinct. To ensure a road network accessible for emergency vehicles, it is requested that the land use development and subdivision rules and standards of the HGLP are amended to achieve this. For all emergency vehicle access requirements, reference should be made to the Designers' guide to firefighting operations Emergency vehicle access FS-02 GD.</p>

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Topic 15: Consultation

Sub Point	Submitter / Further Submitter	Provision / Section	Position	Summary of Decision Requested
S66.5	Greg Reynolds	General	Oppose	This is an important decision for the golf club, it will involve a number of years of building work with potential impact on the golfers. It also requires the golf club to sign over a swathe of land to the developers in return for new buildings (I think 13 - 15 Ha). Because of this high impact on the club members, I would expect to see a section in the Plan on consultation with the HGC members as they are the most impacted stakeholder. There is mention of consultation but no dedicated section.
S88.4	Eruera Morrison, John Newton, Edline Morrison & Maria Newton	General	Oppose	Lack of Meaningful Consultation - The voice of mana whenua must be central in any decision affecting our whenua. There has been little transparency in how Māori concerns are being addressed in this proposal.



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Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

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Appendix B – Independent Technical Review of Noise  
Report by Malcolm Hunt Consulting



# MALCOLM HUNT CONSULTING

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<b>Date of Issue:</b>	2 May 2025
<b>To:</b>	Rebecca Hill rebeccah@hdc.govt.nz Senior Environmental Planner – Policy Hastings District Council
<b>Project :</b>	Review & Assessment of Noise & Acoustic Matters – Private Plan Change 7 – 1523 Maraekākaho Road, Bridge Pā (Hastings Golf Course)
<b>Prepared By :</b>	Malcolm Hunt, Malcolm Hunt Associates

## Hastings District Plan - Private Plan Change 7 – 1523 Maraekākaho Road, Bridge Pā (Hastings Golf Course) Review of MDA Noise Assessment & Discussion of Noise Issues Raised within Submissions

### 1. Introduction

Hastings District Council have engaged Malcolm Hunt Consulting<sup>1</sup> (formerly *Malcolm Hunt Associates*) to provide an independent review of noise matters associated with a recreational and residential development proposed on land near to Bridge Pā Aerodrome, referred to as Plan Change 7 to the Hastings District Plan. Specifically, we have reviewed the noise assessment report included in the application entitled “*Hastings Golf Club - Proposed Plan Change - Noise Assessment*” by Marshall Day Acoustics dated 23 February 2023<sup>2</sup> (Report ref; 001 20230459) hereafter referred to as the “MDA Report”. While potential noise effects within the plan change area of helicopter and fixed wing aircraft movements at the aerodrome are a focus of this review, other ‘reverse sensitivity’ noise effects raised within submissions received following notification of Plan Change 7 are also commented on.

This report sets out general recommendations based on available noise information and assessments undertaken. This review has taken into account information set out in the following documents;

- Plan Change 7 application documents (<https://www.hastingsdc.govt.nz/services/district-plan/changes/plan-change-7/>),
- Plan Change 7 Submissions and Further Submissions received.
- Further information request from Hastings District Council dated 15 January 2024 and response(s) provided to Council.
- Norman Disney & Young 2012 *Bridge Pā Aerodrome Noise Management Plan* (the NDY Report)<sup>3</sup>
- NZS6805:1992 *Airport Noise Management & Land Use Planning*
- NZS 6807:1994 *Noise Management & Land Use Planning For Helicopter Landing Areas*
- Operative Hastings District Plan especially Chapter 25 “Noise”.

### 2. Context

Private Plan Change 7 was initiated by Golf Sport Development Limited Partnership who have applied to change to the Hastings District Plan to rezone land situated at 1523 Maraekākaho Road, Bridge Pā (Hastings Golf Course) from Plains Zone to ‘Sport and Recreation Zone’ with a ‘Heretaunga Golf and Leisure Precinct’ overlay which includes providing for housing and accommodation development. The new zone provides for the existing golf course facility and for future development incorporating new recreational facilities along with associated commercial, residential dwellings, and visitor accommodation. The development includes approximately 170 residences.

Noise is an environmental effect requiring assessment under Resource Management Act 1991 [RMA] procedures. An individual’s reaction to noise can vary widely due to differing individual sensitivity to noise. Many factors affect sensitivity to noise including time of day, state of mind, and the activity being undertaken at the time. Available guidelines usually establish daytime and night time noise limits to protect sensitive activities. Effects of noise can include ‘reverse sensitivity’ effects on the operation of established infrastructure which may be exacerbated when district plans are amended to increase noise sensitive development on sites affected by noise from existing infrastructure.

An assessment of noise effects in accordance with RMA procedures involves assessing effects of noise emitted by activities proposed to take place on the plan change site, together with assessing ‘reverse sensitivity’ effects where the proposal provides for noise sensitive activities to be developed on sites currently (or likely to be in the future) exposed to noise due to existing activities established in the local area. Both assessments are relevant considerations however, owing to the relatively benign noise emission status of activities proposed for the plan change site (residential, visitor accommodation, sporting and recreational activities, etc) the latter ‘reverse sensitivity’ effects due to aircraft noise from the nearby Bridge Pā aerodrome are of far greater significance in land use planning terms. As described below, Plan Change 7, if approved, is identified as having the potential to generate reverse sensitivity effects on the operation of Bridge Pā Aerodrome.

NZS 6805:1992 *Airport Noise Management & Land Use Planning* guides on land use planning within areas affected by noise from current and future aircraft movements at airports and aerodromes. The main unit for noise measurement is the Level Day-Night (Ldn) which is a 24-hour average of received noise, with a 10 dB penalty applied to noise exposure during nighttime hours (10 pm to 7 am). This penalty is added to account for the increased sensitivity to noise during nighttime.

<sup>1</sup> See **Appendix A** for Malcolm’s background and experience.

<sup>2</sup> While the report is dated February 2023, we believe this to be a typographical error (should read [February 2024](#)). This is because this final version of the report includes a response to Hastings District Council’s s.92 request for further information which is dated January 2024.

<sup>3</sup> The Hastings District Plan aircraft noise contours for Bridge Pā Aerodrome are based on the noise prediction inputs and results set out within this 2012 report by consultancy firm Norman, Disney Young (the NDY Report).

In terms of managing the effects of aircraft noise around airports, NZS6805:1992 recommends noise sensitive activities<sup>4</sup> do not establish on sites located within the future Ldn 65 contour area (Airnoise Boundary). Sensitive land use activities are also recommended to be prohibited within areas likely to experience Ldn 55 to 65 (an area encompassed by the Outer Air Noise Boundary) *‘unless a district plan permits such uses subject to a requirement to include acoustic insulation to ensure a satisfactory internal noise environment’* [underlining added] (ref. Table 2, NZS6805:1992). However, Hastings District Plan (Chapter 25) permits new noise sensitive activities to establish within areas potentially affected by noise emitted by Bridge Pā Aerodrome, up to Ldn 55 to 65 dB Ldn. In terms of reverse sensitivity effects on Bridge Pā Aerodrome where noise sensitive uses establish within the Outer Air Noise Boundary (Ldn 55 to 65 dB Ldn) Chapter 25 provides for ‘optional’ acoustic insulation for habitable rooms within new buildings housing noise sensitive activities<sup>5</sup> and provides for Consent Notices to be registered on the Certificate(s) of Title *“to ensure landowners are aware of the operations of the Bridge Pā Aerodrome and agree not to complain if the aerodrome is operating within the noise requirements of this standard”*<sup>6</sup>. In addition, potential owners may receive a noise advisory notice within any LIM or PIM reports<sup>7</sup> for properties within the areas expected to receive up to Ldn 55 to 65 dB Ldn. As an overall observation, compared to the recommendations of NZS6805:1992, the Hastings District Plan provides only limited reverse sensitivity protection to the aerodrome operation<sup>8</sup>.

The 2018 environment court decision *Ngatarawa Development Trust Limited v Hastings District Council*<sup>9</sup> identified Bridge Pā Aerodrome as a regionally significant aerodrome and to a large extent, this is confirmed within the status Hastings District Plan. Available information<sup>10</sup> confirms, the airport is busy as it is home for several light aircraft operators including the Hawke’s Bay and East Coast Aero Club, all producing approximately 33,000 annual aircraft movements per annum and is a significant base for commercial helicopter operations in the Hawke’s Bay region. Noise from helicopters is assessed in NZ using NZS 6807:1994 *Noise Management and Land Use Planning for Helicopter Landing Areas*. This standard assesses noise from helicopters on a slightly different basis than that adopted within NZS6805:1992 for fixed wing aircraft. This is alluded to in clause 4.1.2 of NZS6807:1994 which states:

*“This standard has been prepared taking into account the distinctive character of helicopter noise, and the nature of operations from helicopter landings areas. NZS6802 “Assessment of environmental sound” and NZS 6805 “Airport noise management and land use planning” are inappropriate for the assessment of noise from helicopter lands areas”.*

Table 1 of NZS 6807:1994 (limits of acceptability) indicates residential zones and buildings in rural areas housing noise sensitive activities should receive not more than Ldn 50 dBA per 24 hour day (on average) and Lmax 70 dBA for any individual helicopter event during night time. The equivalent Ldn guidance for noise from fixed wing under NZS6805:1992 is Ldn 55 dB<sup>11</sup>. While the noise effects of aircraft operations at Bridge Pā (occurring over the Plan Change 7 site in particular) are due to a mix of fixed wing and helicopter aircraft movements, overall this mix of noise sources is likely to be more annoying (at the same Ldn noise level) than noise due to fixed wing movements alone.

The district plan Airnoise boundaries are based on the aircraft noise predictions set out in the NDY report prepared in 2012. The MDA Report submitted as part of the plan change has attempted to repeat those earlier aircraft noise predictions, based on the same air traffic data set out in section 3.3 of the NDY report. Aircraft noise prediction results set out within both the NDY Report and MDA Report confirm areas proposed for noise-sensitive visitor and residential accommodation within the Plan Change 7 area lie outside the Ldn 55 dB Outer Air Noise Boundary.

Based on MDA noise predictions, proposed noise sensitive sites will be located within areas expected to receive future aircraft noise at levels up to Ldn 50 to 52 dB. A discussion on potential noise effects on sites expected to receive less than 55 dB Ldn is set out below, also referring to:

- a) Plan Change 7 includes golf club land which is located within the Outer Air Noise Boundary (>55 dB Ldn) however according to the layout shown in the structure plan, this part of the plan change site is not proposed to be used for noise sensitive activities within. To ensure adequate mitigation within this most noise-exposed portion of the plan change area, a recommendation is set out below which recommends District Plan provisions applying in this area to ensure that establishing noise sensitive activities within this area be a non-complying activity, and if approved, be subject to mandatory compliance with the district plan acoustic insulation standards for habitable rooms<sup>12</sup>; and

<sup>4</sup> The Hastings District Plan defines ‘noise sensitive activities’ as *“any use of land and/or buildings which is likely to be susceptible to the effects of noise emitted from nearby land uses in the course of their legitimate operation and functioning; and for the purposes of this plan, includes early childhood centres, educational facilities (but not any trade training or other industry-related educational facility), health care service, places of assembly, residential activities, retirement villages, visitor accommodation, and camping grounds”.*

<sup>5</sup> Chapter 25.1.F(f) states: *“To avoid doubt there is no requirement for noise sensitive activities to incorporate acoustic insulation or obtain an acoustic design report within the Outer Air Noise Boundary (excluding the Air Noise Boundary)”.*

<sup>6</sup> See District Plan Chapter 25.1.F(e)

<sup>7</sup> Chapter 25.1.4 provides for notices to be included in any *Land Information Memorandum* and *Project Information Memorandum* for sites located within the Outer Control Boundary Area, indicating the site is subject to aircraft noise *“...and that the property owner should take this into account when considering future development of the site”.*

<sup>8</sup> This is despite Policy TP8 of the Transportation Chapter which seeks to *“Manage the effects associated with the operation of the Bridge Pa Aerodrome on adjoining activities”.* This is accompanied by an explanation which states *“Noise associated with the use of the Bridge Pa Aerodrome will generate negative effects on adjoining land uses. The District Plan will control the establishment of activities which are incompatible with the operation of the aerodrome, as well as establishing appropriate noise limits for the operation of the aerodrome and its associated activities.”*

<sup>9</sup> Environment Court, Napier, W017/2008, Thompson J, 15 April 2008.

<sup>10</sup> For example, section 2 “Hawke’s Bay Airport - Long-Term Traffic Forecasts” JULY 2019 prepared by Christchurch International Airport Limited.

<sup>11</sup> There are no fixed wing aircraft Lmax noise criteria set out within NZS6805:1992.

<sup>12</sup> To accord with District Plan Chapter 25 - TABLE 25.1.7F Acoustic Insulation Standard.

- b) There are two existing residences located in the proposed Maintenance Area<sup>13</sup> expected to receive about Ldn 55 dB. Below it is recommended that no new buildings (or building extensions) housing noise-sensitive activities be established within that part of the Plan Change 7 sites located within the district plan's Outer Air Noise Boundary (OCB) for Bridge Pā Aerodrome.

Land use planning guidance within NZS6807:1994 regarding noise emitted from helicopters landing areas recommends sensitive receiver sites be protected to noise standards set generally 5 dB below those applying to noise from fixed wing aircraft under NZS6805:1992. This difference reflects the special nature of helicopter noise which is generally found to be 5 dB more annoying (at the same sound level) compared to noise from fixed wing aircraft. The Lmax limit of NZS6807:1994 applies to helicopter movements taking place between 10pm and 7am as a means of protecting sleep during night time hours<sup>14</sup>. This noise limit of 70 dB Lmax received at sensitive receiver sites between 10pm and 7am is a threshold within NZS6807 for use when deciding whether noise emissions are significant at landing sites with low levels of use<sup>15</sup>. The Lmax limit of 70 dB limit is also adopted within district plan Rule 25.1.7G (a) *Noise associated with helicopter depots* as a night time noise performance standard for helicopter depots.

Lmax 70 dBA during night time is therefore considered a relevant noise threshold when assessing effects of Plan Change 7, specifically for assessing the effects of current and future night time helicopter activity at the Bridge Pā Aerodrome on areas proposed to be developed for noise-sensitive residential and accommodation facilities. Although helicopter operations at Bridge Pā aerodrome occur both regularly and frequently (including during night time), it is instructive that the Lmax 70 dB night time threshold is one of the thresholds to consider within NZS6807:1994 when considering whether this Standard should be applied to any specific helicopter landing site (ref. clause 1.1 NZS6807:1994).

### 3. MDA Aircraft Noise Predictions

The MDA Report sets out information on the planning framework, the existing noise environment, the future noise environment as predicted by aircraft noise modelling, reviews noise effects from other surrounding activities and provides conclusions on potential conflict between the aerodrome (and other activities) and the proposed plan change 7 activities. According to the MDA Report, the noise sensitive development associated with Plan Change 7 lies some 700m east of the Bridge Pā Aerodrome. However, using Council's online map tools, we have found the closest plan change residential and visitor accommodation sites will lie some 442 metres along the centreline of crosswind runway 29/11.

Aircraft noise predictions set out within the MDA report have sought to replicate the NDY aircraft noise predictions, extending the predictions to include an Ldn 50 contour line and have separately modelled Ldn noise levels associated with helicopter movements undertaken from Bridge Pā Aerodrome. NZS6805:1992 recommends future predicted Ldn values take into account variations in airport operations within a year (e.g. due to seasonal effects) and would normally be based on the busiest 3 month period. In this case predicted Ldn values are based on NDY aircraft movement data for a future "average day" (total annual forecast movements divided by the number of days in a year). While no specific allowance seems to have been made in the NDY contours to account for busier periods, the district plan airnoise boundaries are now well established and could not be amended under the current plan change.

Within their predictions, MDA appear to have located the helicopter landing area on the aerodrome site in the same general area as the NDY report - south of RW29 between RW01 and RW29. There does not appear to be any substance to submitter claims that the MDA Report has not located the helicopter landing area correctly on the aerodrome site.

Information contained within submissions to Plan Change 7 confirm Runway 11/29 flight paths which lie directly across the Hastings Golf Course and plan change 7 site are regularly used. It is said the Runway 11/29 is used by general aviation aircraft when easterly and westerly winds prevail. Submitters have confirmed helicopters arrive and depart east/west for approach and departures as standard procedure and pass over the plan change site at under 185 m. Helicopter circuits also are said to operate in the opposite circuit to fixed wing circuits on the 01/19 runway and directly overfly the golf course site.

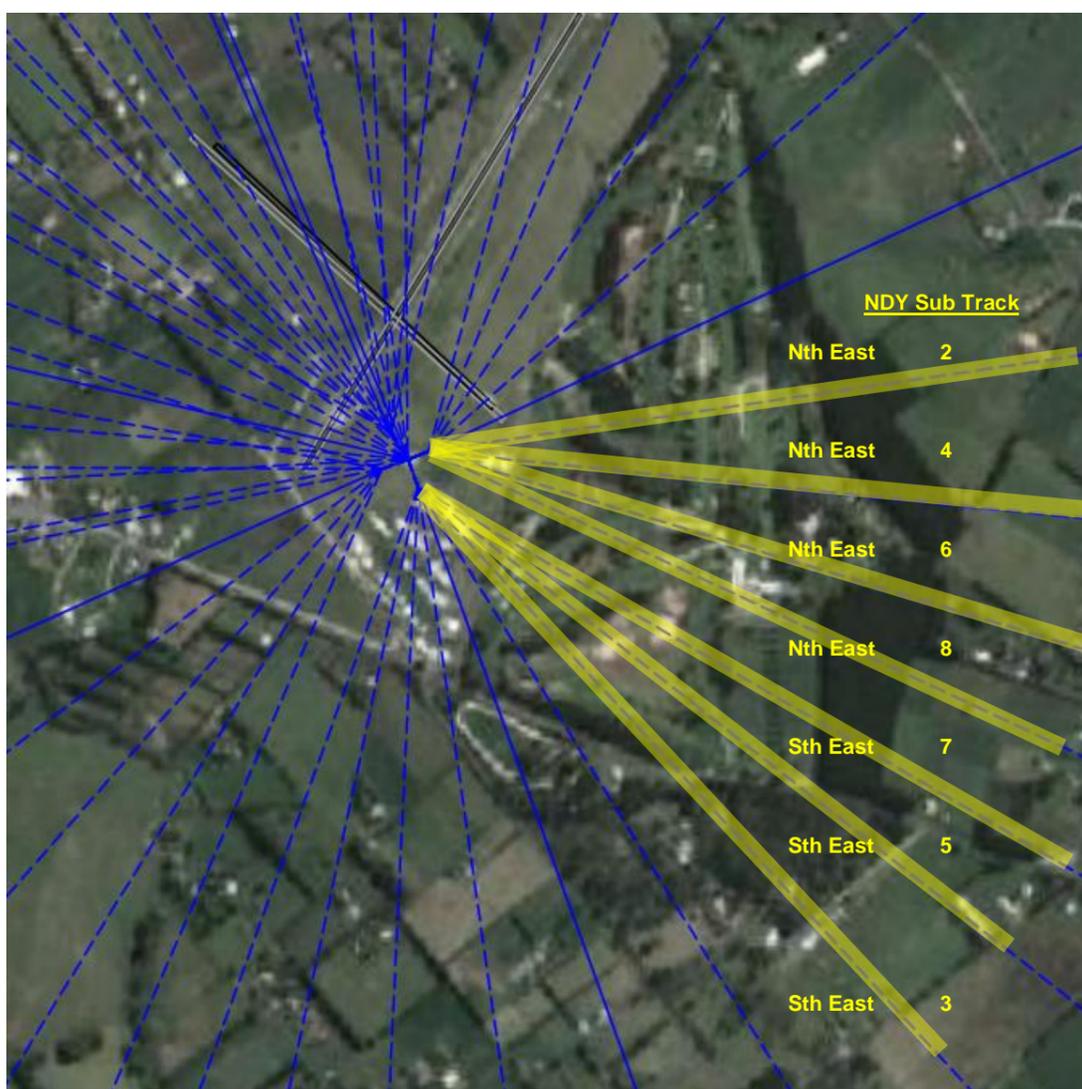
Information on fixed wing aircraft and helicopter flight tracks for arrival and departure and touch-and-go landings are as set out within diagrams attached as Appendix B to the NDY Report (which we understand may not have been available to the MDA). Appendix G to the MDA Report sets out how the MDA predictions adopted aircraft movement data from tables in the NDY report (Table 3 and Table 4) but appear to have adopted different flight tracks and runway split factors.

The outcome appears to be that the MDA Report refers to helicopter movements distributed over a different set of flight tracks than those used for modelling helicopter movements within the NDY predictions. MDA state they have assumed 10% of helicopter movements flying straight tracks aligned with runway 11/29 over the golf course, travelling to/from the nominated helicopter landing area. The MDA Report (Appendix G - INM Input Data) states the MDA predictions include "no night flights on Runway 29" yet Appendix G, Table G2 refers to 10% of helicopter movements taking place on being on Runway 29, the use of which results in helicopters overflying the golf course site. This differs from the NDY predictions which assume a distributed pattern set out in Tables 6, 7 and 9 of section 3.3 of the NDY Report. The following excerpt from the helicopter flight track diagrams appended to the NDY report show the flight tracks and sub-tracks assumed within the NDY modelling of helicopter movements, within the overall modelling of fixed wing and helicopter movements to derive the district plan air noise boundaries.

<sup>13</sup> According to the application, Maintenance Area provides "staff accommodation facilities" in addition to a range of golf maintenance facilities and yards for the onsite wastewater management and refuse collection.

<sup>14</sup> Although both NZ standards 6805 and 6807 both adopt Ldn noise levels within their noise exposure guidance, only NZS6807:1994 recommends noise be assessed during night time hours using criteria based on a maximum sound measured using the Lmax metric.

<sup>15</sup> Note, the companion daytime NZS6807:1994 application criteria set a threshold is 90 dB Lmax during daytime within any residential zone or within the notional boundary of any rural dwelling. Daytime helicopter noise levels across the plan change site would be unlikely to emit this level of sound, in any event, impact of daytime helicopter noise effects is adequately assessed using the Ldn metric.



**Figure 1** Helicopter flight tracks (sub tracks) extracted from the NDY 2012 report and which the district plan aircraft noise contours are based. Highlighted helicopter sub-tracks are those estimated to overfly the Plan Change 7 site.

In summary, while the NDY modelling assumes night time helicopter movements across land subject to Plan Change 7, it is not clear from the MDA Report the extent to which night time aircraft movements may take place over the plan change area. There is no assessment of this noise effect within the MDA Report. As below, the importance of night time helicopter overflight of the plan change area is based potential sleep disturbance effects generated by helicopters legitimately overflying proposed noise sensitive areas during night time hours .

Section 3.3 of the NDY Report sets out forecast helicopter movements separately for day time and night time, distributing these movements across the nominated flight tracks and sub-tracks (such as those which travel over the plan change area shown in Figure 1 above). Based on the NDY data tables we have calculated the expected number of helicopter overflights (approach or departure) expected to pass over that part of the plan change site proposed to be developed for noise sensitive activities as follows;

	Approach		Depart		TOTAL (App & Dep)	
	Day	Night	Day	Night	Day	Night
PER DAY	1.0	0.0	1.0	0.0	2.1	0.1
PER WEEK	7.3	0.3	7.3	0.3	14.6	0.6
PER MONTH	31.2	1.4	31.2	1.4	62.4	2.8
PER YEAR	379.4	16.9	379.4	16.9	759	34

This table indicates the number of helicopter movements that may take place over the plan change site in compliance with the Bridge Pā noise contour limits set out in Chapter 25 of the Hastings District Plan. Section 4 below discusses the effects associated with night time helicopter movements taking place over the plan change site.

**4. Night time maximum noise levels**

As above, the relevant guidance on night time noise effects of helicopter operations indicates a threshold for acceptability would be Lmax 70 dB received at noise sensitive locations. Overflight of the plan change 7 site is explicitly indicated within the NDY (and is possibly included the MDA Report). The available information confirms parts of Plan Change 7 area to be used for noise sensitive activities will be affected by daytime and night time overflight noise. While it is acknowledged such aircraft overflight noise maybe infrequent with a low number of night-time events over the plan change area, it does suggest that this noise environment is adversely impacted to some reasonably significant extent, especially as this involves potential sleep disturbance. It is noted that clause 1.4.3.6 of NZS6805:1992 states;

“For small airports or airports with infrequent or irregular daily usage patterns, planning on the basis of sound exposure contours may not provide an adequate protection area around the airport to avoid sleep disturbance”.

The situation described in this clause of NZS6805:1992 aligns well with potential night time noise impact identified as likely to occur across the Plan Change 7 application site as a result of night time helicopter over flights, including within Plan Change 7 areas proposed to be used for noise sensitive activities. In other words, simply because those parts of the Plan Change 7 area proposed to be used for noise sensitive activities are located outside the Outer Air Noise Boundary, this does not mean these sites will receive adequate protection to avoid sleep disturbance.

Helicopter overflight noise is likely to be received at significant levels at ground level, within the plan change area. Helicopter noise levels are certified internationally. In terms of helicopter Lmax levels, the FAA certification noise limits under 14 CFR Part 36 "Noise Standards: Aircraft Type and Airworthiness Certification" Appendix G to that document sets out helicopter Lmax noise criteria with the following extract from the regulations summarising the approach:

*The noise level must not exceed Lmax 76 dB (A) up to and including aircraft weights of 1,320 pounds (600 kg). For aircraft weights greater than 1,320 pounds, the limit increases from that point with the logarithm of airplane weight at the rate of 9.83 dB (A) per doubling of weight, until the limit of 88 dB (A) is reached, after which the limit is constant up to and including 19,000 pounds (8,618 kg). The following figure shows helicopter noise limits vs. airplane weight.*

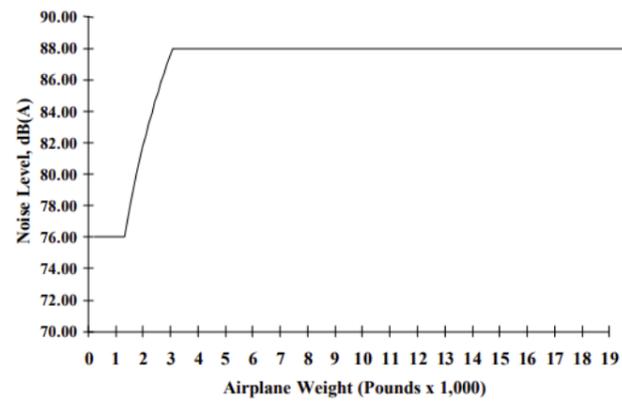


Figure 17 - Noise Level vs. Airplane Weight (Figure G2 of part 36, Appendix G)

As can be seen from the above graph, for typically sized modern helicopters (between 600kg to 8,618 kg) the noise limit certified under the FAA Regulations lies between Lmax 76 and 88 dB. This limit applies to the sound level measured 120 metres below the helicopter on approach or departure. These levels are measured beneath the flight track as shown in Figure 2.

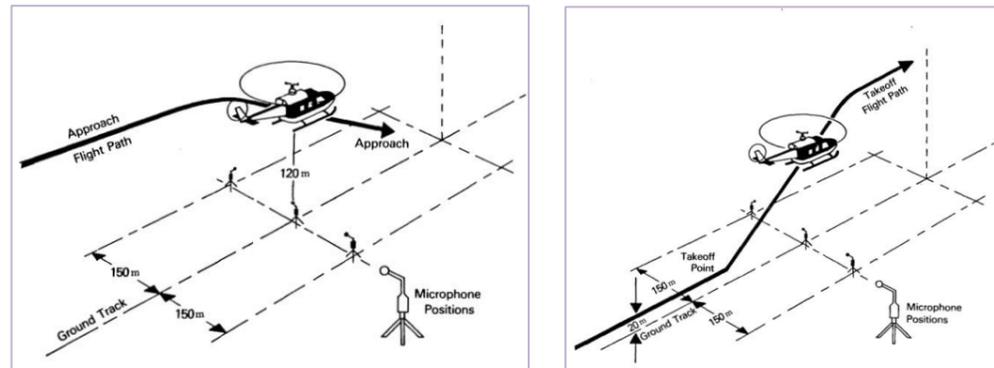


Figure 2 Microphone locations for certification measurement of helicopter approach and departure noise levels (ref. FAA Advisory Circular “Noise Standards: Aircraft Type And Airworthiness Certification” Dated: 7/15/03 Initiated by: AEE-100 AC No: 36-4C)

Thus, it is reasonable to expect helicopter models certified under the almost universally accepted FAA Regulations would result in an Lmax level of between 76 and 88dB being received on the ground beneath the helicopter flight track. Based on aircraft regulations, levels of noise (Lmax) during helicopter flyover are likely to be received during nighttime within the plan change site at levels exceeding the Lmax 70 dB night time helicopter noise criteria set out the Hastings District Plan<sup>16</sup> and the relevant NZ Standard NZS6807:1994 (Table 1) for assessing noise impacts of helicopter landing areas.

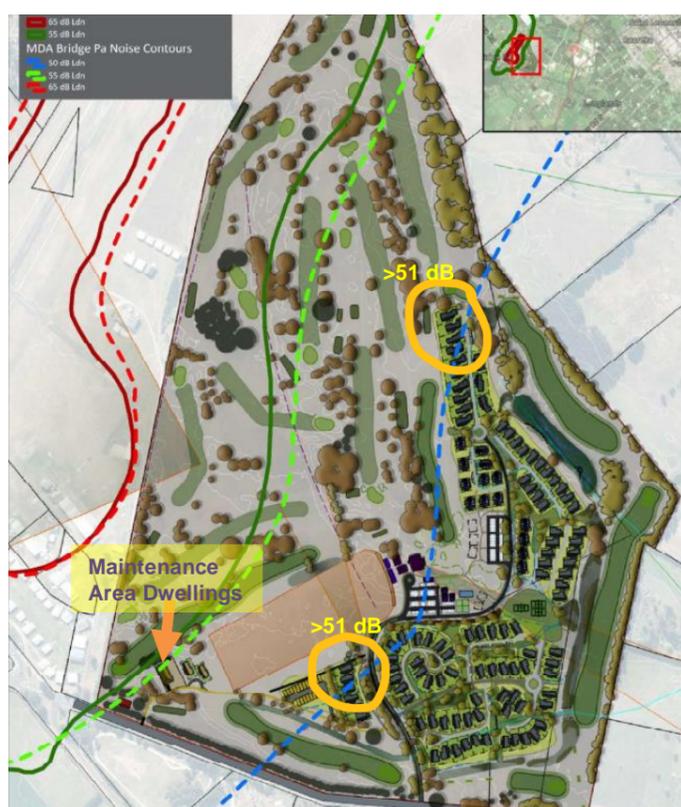
On this basis, it is considered there is significant potential for night time noise disturbance within the plan change site due to noise from helicopter over-flight during night time hours, in addition to noise disturbance due to daytime fixed wing and helicopter movements at Bridge Pā Aerodrome.

<sup>16</sup> TABLE 25.1.7G Noise Limits For Helicopter Depots – Lamax 70 dB night time limit for Rural Zones (at any point within the notional boundary)

**5. Noise Exposure >50 dB Ldn**

Aircraft noise exposure maps attached to the MDA Report show future aircraft Ldn noise levels (fixed wing + helicopters) generally align with (but are slightly bigger than) the NDY aircraft noise predictions published in 2012. In general, the results show residential development will be exposed to slightly more than 50 dB Ldn (or less) from the future aerodrome operations. 50 dB Ldn is 5 dB lower than the 55 dB Ldn used in the District Plan for the onset of planning controls ( Outer Air Noise Boundary) however across all sensitive receiver sites excluding existing dwellings in the proposed maintenance area, future aircraft noise levels will be up to 53 dB Ldn. This is an appreciable average level of daily noise exposure, in this case due to daytime and night time overflying events coupled with sideline noise emitted from aircraft using the main runway. As discussed below, aircraft engine testing noise will be emitted from Bridge Pā aerodrome from time to time and would be experienced within the plan change site in addition to aircraft noise.

Apart from the Maintenance Area (discussed below) the structure plan shows two areas where proposed residential sites are expected to receive future aircraft noise levels exceeding 50 dB Ldn. These are shown in two locations marked below in Figure 3.



**Figure 3** MDA aircraft noise contour diagram indicating MDA predictions of future aircraft noise in addition to the district plan Ldn noise contours. The two circled areas indicate proposed noise sensitive sites likely to receive future aircraft noise >50 dB Ldn.

WHO 2018<sup>17</sup> published public health and subjective response data including widely referred to ‘dose response’ relationships between aircraft noise exposure (outdoor Ldn) with expressed noise annoyance. Within higher noise environments (greater than 65 dB Ldn) 46% of the population living within these areas were found to be highly annoyed. For aircraft noise environments of 55 dB Ldn, 27% of the population were highly annoyed by the noise, which is of significance. Recent overseas studies have shown that between 50 dB and 55 dB Ldn, 18% to 33% of people were found to be highly annoyed by aircraft noise<sup>18</sup> which can result in adverse noise effects within a high amenity environment.

In this case, a specific concern is occasional night time helicopter overflights resulting in received noise effects >70 dB Lmax potentially causing sleep disruption effects and/or cause complaints regarding airport operations. Over the years various noise experts have expressed concerns regarding development of sites within areas moderately affected by aircraft noise, i.e. less than Ldn 55 dB. The nature and scale of these potential effects in this case, including night time disturbance, are considered to be of significance and deserve close scrutiny when assessing effects of allowing noise sensitive development within noise affected areas, as proposed within the plan change documents.

**6. Ambient Sound Level Survey**

Section 3 of the MDA Report summarises the results of measurements of existing ambient sound levels taken at one location on the Golf Course site, adjacent to Bridge Pā Aerodrome. As some submitters to Plan Change 7 have pointed out, Appendix E sets out logger results for the period 9th to 22 October 2023, however this conflicts with Section 3 of the MDA Report which states the noise logger was in operation for a period of two weeks from 8 September 2023 to 22 September 2023. This discrepancy needs to be resolved however it seems historical

<sup>17</sup> World Health Organization, Environmental Noise Guidelines for the European Region. 2018

<sup>18</sup> As per evidence to the of C.Day to Plan Change 14 (Housing and Business Choice) to the Christchurch District Plan on behalf of Christchurch International Airport Limited. Sept 2023.

meteorological results ([www.weatherunderground.com](http://www.weatherunderground.com)) indicates neither 14th and 15<sup>th</sup> nor 17<sup>th</sup> and 18<sup>th</sup> of either September or October 2023 experienced adverse weather requiring the results for these dates to be discarded.

The results of the ambient survey are presented in detail in Appendix E, specifically Table E3 of the MDA Report. No Lmax values have been recorded within the logger results presented in Table 3. The daily Ldn average noise level results (due to identified aircraft events) ranged from 43 to 52 dB Ldn with a 10 day average of 48 dB Ldn. The overall ambient noise level (all sources including aircraft events) ranged from 48 to 55 dB Ldn with a 10 day average of 53 dB Ldn.

Whereas the monitoring results confirm current Ldn levels (aircraft noise only) at the monitoring site are experienced at levels in the region of 5 dB below the maximum Ldn noise levels provided for by the location of the district plan airnoise boundaries. Due to the prospect of potential adverse effects of aircraft overflying the plan change site, it is considered a short-coming that no Lmax readings have been logged for overhead aircraft movements. These overhead aircraft movements were clearly signalled within the NDY noise predictions upon which the district plan contours are based.

Noise readings measured manually with a sound level meter next to the noise logger microphone were undertaken on 8 September 2023 between 2:00 pm and 2:40 pm. These readings are summarised in Table E2. These results do include Lmax readings. Lmax readings taken over this 40 minute period resulted in two Lmax readings being 56 to 59 dB Lmax however there appear to have been no aircraft overflights undertaken during the manual monitoring period. Overall, the results of ambient noise readings undertaken by MDA at the identified monitoring location are of limited value to the assessment of noise effects of Plan Change 7.

**7. Engine Testing noise**

Under District Plan clause 25.1F (d) noise at Bridge Pā Aerodrome due to aircraft engine testing activities is controlled to the following limits at any point within any Residential Zone or within the notional boundary of any noise sensitive activity (*underlining added*):

Control Hours	Noise Level
0700 to 1900 hours	55 dB LAeq(15 min)
1900 to 2200 hours	50 dB LAeq (15 min)
2200 to 0700 hours the following day	45 dB LAeq (15 min)
2200 to 0700 hours the following day	75 dB LAF max

It is a CAA safety requirement that aircraft engines are tested following any significant engine maintenance work. While aircraft engine testing noise received in compliance with the above limits is not necessarily likely to be a regular noise source causing adverse effects within the plan change site, this is nevertheless a noise source which may affect local amenity, including during night time<sup>19</sup>.

Potential noise effects associated with noise from aircraft engine testing at Bridge Pā Aerodrome are not considered within the MDA Report. The point to note is that, should Plan Change 7 be approved, proposed dwellings and accommodation facilities will likely represent the closest receiver sites to engine testing carried out adjacent to the crosswind runway or near the helicopter landing area on the aerodrome. Under Rule 25.1F(d), an effect of approving Plan Change 7 may mean the Aerodrome is no longer be able to carry out engine testing in compliance with district plan noise limits when engine testing is undertaken within those parts of the Aerodrome site within proximal distance to new residential sites proposed to be established under Plan Change 7. This would be an obvious and direct reverse sensitivity effect on aerodrome operations.

**8. Noise Sensitive Uses In Maintenance Area**

A Maintenance Area within the Heretaunga Golf & Leisure Precinct (PREC1) provides for a range of golf maintenance facilities, yards for onsite wastewater management and refuse collection as well as staff accommodation facilities). There are two maintenance staff dwellings shown in the development plan which are located at approximately 54 to 55 dB Ldn<sup>20</sup>.

Should the plan change be approved, the plan change provisions this review recommends that these dwellings, being the most exposed residential sites within the plan change site, not be permitted to expand or intensify or any new dwellings permitted to occur within that part of the Maintenance Area that lies within the Outer Air Noise Boundary. This would reflect the recommendations of NZS6805:1992 and support district plan Policy TP8 which seeks to manage effects associated with the operation of the Bridge Pā Aerodrome on adjoining activities. In this regard, should Plan Change 7 be approved, it is recommended that requested rule PREC1-R6 *Residential Activities within the Maintenance Precinct* be modified to ensure that, should any replacement dwellings or expansions be proposed within the Maintenance Area, the result would not worsen the noise exposure of the existing dwellings. The recommended amendment is to stipulate that establishing any new or altered habitable room within the Maintenance Area located within *Outer Air Noise Boundary* (55 dB Ldn) would be a classified as a non-complying activity based on potential noise effect basis managed in accordance with the land use planning guidance set out in NZS6805:1992.

<sup>19</sup> Even for compliant engine testing noise, there may be adverse effects for sensitive receivers established within the plan change site. This is because the LAeq noise limits of 25.1F(d) are based on levels assessed over only 15 minutes. Even when engine testing noise is compliant Rule 25.1(d) noise effects may may not be controlled adequately where engine testing is carried in compliance with he stated limits over longer periods such as 2 to 3 hours in duration (this has been found to be the case with engine testing noise effects at some other NZ aerodromes and airports).

<sup>20</sup> As shown in MDA Figure 2 contour diagram, the Ldn 55 dB contour almost impinges on these dwellings.

## 9. Non-Aerodrome Reverse Sensitivity Noise Effects

Apart from the significant issue of reverse sensitivity effects of Plan Change 7 on the operation of Bridge Pā Aerodrome, submissions received following public notification of Plan Change 7 frequently mention potential reverse sensitivity noise effects for other industrial, rural or club activities established in the local area. The concern is that, should Plan Change 7 be approved, noise emissions from existing non-aerodrome activities in the area will generate complaints from the new dwellings and accommodation facilities developed on the plan change site.

Submitters mentioning potentially adverse reverse sensitivity effects on existing activities and operations are listed as follows;

- 1) 41 Stock Rd (Industrial Activity Packhouse)
- 2) 76 Stock Rd (Industrial Activity Recycling Facility)
- 3) 237 Chatham Rd (Intensive Rural Production Gourmet Blueberries)
- 4) 116 Raukawa Rd (Industrial Activity Gravel Extraction)
- 5) 1424 Maraekakaho Rd (Industrial Activity Beacham Car Restoration)
- 6) 1534 Maraekakaho Rd (Deerstakers Club)
- 7) 1558 Maraekakaho Rd (Hawke's Bay Car Club)
- 8) 66 Rosser Rd (Intensive Rural Production Green Acres Poultry Farm)

In relation to non-aerodrome activities, this review has identified two relevant concerns, should Plan Change 7 be approved;

- a) Noise from existing non-aerodrome activities in the area may cause complaints to arise from the new noise-sensitive receivers established within the plan change area. This may potentially result in unwanted additional activity controls being placed on the noise-generating activity; and
- b) Noise from existing non-aerodrome activities in the area may encounter district plan compliance issues given that noise rules for permitted activities in the Rural Zone are based on compliance with stated noise limits "at any point within the notional boundary of any noise sensitive activity on any other site within a Rural Zone" and "at any point within the boundary of any site, in any Zone other than an industrial zone". Approving Plan Change 7 would result in re-zoning the golf club site 'Sport and Recreation Zone' meaning a new 'zone boundary' compliance location would apply around the golf club site. As below, the MDA analysis found compliance locations (rural dwellings) already exist that are closer to the above various noise-generating activities, compared to the new zone boundary.

Within its s.92 request for further information, Council requested MDA to assess each of the above 8 non-aerodrome noise sources in terms of potential reverse sensitivity effects, should the plan change be approved. The MDA response to this request is contained within Appendix H - *Reverse Sensitivity Noise Effects Analysis (Non-Aerodrome Activities)* of the MDA Report. Each activity is commented on in terms of potential for reverse sensitivity effects. In all cases the MDA assessment found, so long as the industrial, rural production or club activities are undertaken in accordance with noise limits set out within a relevant resource consent, or with the permitted activity noise standard for rural areas, there would be low potential for reverse sensitivity noise effects on these existing activities. A key finding was that existing rural dwellings were located closer to each noise-generating activity than the plan change site boundary, meaning approving Plan Change 7 would not be likely to cause noise compliance to be assessed at locations closer to the activity than existing rural dwellings. Subject to comments below regarding the Car Club site, this review has found the MDA finding to be reasonable (that existing noise compliance locations would not change should Plan Change 7 be approved).

In relation to 1558 Maraekakaho Road (Hawke's Bay Car Club), the MDA report identifies dwellings within the car club site as the closest noise compliance locations (and hence establishing the proposed Sport and Recreation Zone across the road would not be likely to affect compliance with district plan noise limits). However, we find this too simplistic. It is generally accepted that noise compliance is not enforced at dwellings located on the same site as the activity. This review considers establishing the proposed Sport and Recreation Zone directly across the road Maraekakaho Road from the car club site does heighten risk of non-compliance with district plan noise limits, as far as these apply to Car Club activities.

We consider there to be low risks regarding complaints arising from noise sensitive activities establishing within the plan change area where non-aerodrome activities operate in compliance with the relevant noise limits. While there can be unusually sensitive people who may complain at low levels of received sound, compliance with the relevant day/night consent or district plan noise limits is considered to be generally sufficient to avoid complaints and thereby avoid reverse sensitivity noise effects caused when new noise sensitive uses establish on the golf course site, should Plan Change 7 be approved.

## 10. Non-Complaint Covenants

The district plan sets out a covenant 'tool' within Hastings District Plan clause 25.1F(e)<sup>21</sup> however, while some legal cases have found in some circumstances these have useful mitigation role to ensure that the purpose of the RMA is able to be achieved, this review considers this tool to be inferior as it fails to effectively avoid, remedy, or mitigate the noise which causes reverse sensitivity noise effects. Such covenants registered on the title of properties are not considered effective in ensuring noise is managed appropriately at source, which is a prime consideration (RMA s.16 duty to avoid unreasonable noise).

<sup>21</sup> Requiring, as a condition of subdivision of any site within the within the Outer Air Noise Boundary to Bridge Pā Aerodrome , a Consent Notice to be registered on the Certificate(s) of Title of the relevant lot(s) so formed. The purported function of the notice is to '....ensure landowners are aware of the operations of the Bridge Pā Aerodrome and agree not to complain if the aerodrome is operating within the noise requirements of this standard'.

The Environment Court in *Ngatarawa Development Trust Limited v Hastings District Council W017/2008* observed: “such covenants do not avoid, remedy and mitigate the primary effects – nothing becomes quieter, less smelly or otherwise less pleasant simply because a covenant exists”. Broad imposition of covenants of the kind proposed, over the Plan Change area, are not supported by this review as they are not considered consistent with the requirement to promote the sustainable management of resources, or are necessary for the sustainable management of the Airport and its operations. It is considered unwise to rely on this method for long term land use compatibility around Bridge Pā Aerodrome.

### 11. Overall Assessment

Taking each of the above matters into account, the overall assessment is that there is significant potential for reverse sensitivity noise effects to impact on the operation of the Bridge Pā Aerodrome should the private plan change request be approved as applied for. Although the plan change simply seeks to rezone from Plains Production to a new ‘Sport and Active Recreation Zone’, with a new ‘Heretaunga Golf and Leisure Precinct’ overlay, the development involves establishing approximately 170 new residential dwellings together with visitor accommodation within an area significantly affected by aircraft noise, including overflying activities likely to result in noise on the ground exceeding 70 dB Lmax during night time at sensitive receiver locations across the plan change site.

The review raises questions regarding aspects of the MDA Report including inadequate assessment of the effects of night time helicopter movements from Bridge Pā Aerodrome. Section 3.3 of the NDY Report clearly indicates (within the air traffic data and track split data tables) helicopters are modelled as flying over the plan change site during night time (from time to time). Putting aside omissions and errors discussed above, the MDA report is considered adequate for the purpose of assessing noise effects of Plan Change 7.

The overall finding is that the plan change site, despite being located within proximal distance to Bridge Pā Aerodrome, will likely receive moderate but not excessive levels of aircraft noise in the future with received noise exposure levels limited by airport noise boundaries and applicable noise emission limits set out within the Hastings District Plan<sup>22</sup>. However, while noise effects on people living and staying within the proposed plan change area are unlikely to be wholly unacceptable to them, some sleep awakening effects and annoyance due to aircraft overflights can be expected from engine testing noise and night time helicopter overflights in particular.

Should the plan change application be approved, this review identifies the main risks regarding noise effects would be:

- a) The risk of noise complaints and community actions due to aircraft noise annoyance and possible sleep disturbance effects on occupiers of the proposed noise sensitive sites within the plan change area leading to complaints and possibly actions taken to restrict aerodrome activities in the long term;
- b) Due to noise from night time helicopter movements overflying the plan change area, approving Plan Change 7 may cause ‘Helicopter Depot’ district plan permitted activity Lmax noise limits of rule 25.1.G(a) to be breached. This could have serious compliance effects on the aerodrome should the helicopter landing site at the aerodrome be considered to fall within the district plan definition of a ‘Helicopter depot’.
- c) Approving Plan Change 7 may potentially cause non-compliance with engine testing noise limits of Rule 25.1F(d) meaning the Aerodrome may no longer be able comply with district plan limits for engine testing undertaken within those parts of the Aerodrome site within proximal distance to new residential sites proposed to be established under Plan Change 7.

For the reasons set out in section 9 above, this review does not attach significance to submitter claims that approving the plan change would be likely to give rise to non-aerodrome reverse sensitivity effects on established noise-generating activities in the area. Non-complaint covenants are proposed as a means of managing potentially adverse reverse sensitivity effects on the operation of the aerodrome. This review does not support such covenants as an effective or efficient means of dealing with noise effects that may cause reverse sensitivity effects on the aerodrome.

### 12. Proposed Plan Change Noise Provisions

Should Plan Change 7 be approved, the following comments and recommendations are made with respect to noise controls requested to be included with the district plan as part of the Plan Change7 application;

#### Heretaunga Golf & Leisure Precinct (PREC1)

PREC1-R7 *Any noise sensitive activity within the Air Noise Boundary* sets out a minimum acoustic insulation standard for any ‘noise sensitive activity’ establishing within the Airnoise Boundary. The Air Noise Boundary is referred at 25.1.7F(a) of the District Plan and is depicted on Appendix 35 (Bridge Pā Aerodrome) appended to the district plan. PREC1-R7 is not needed as Plan Change 7 area does not include any land located within the Airnoise Boundary. The ‘Introduction’ to the states on page 1 that “*The residential development area is located away from the Bridge Pā Aerodrome Noise Contour boundary line*”. As the term ‘Bridge Pā Aerodrome Noise Contour Line’ is not a term used within the Hastings District Plan, there is a possibility PREC1-R7 was intended to apply to the Outer Air Noise Boundary (Ldn 55 dB) which does affect a significant portion of the plan change site. As above, while this land is not proposed for noise sensitive activities within the layout shown in the structure plan provided, it is recommended this most noise-exposed portion of the plan change area be subject to a requirement which makes establishing noise sensitive activities in this area a non-complying activity, and if approved, be subject to mandatory compliance with

<sup>22</sup> Hastings District Plan Rule 25.1.7F Aircraft Noise - Bridge Pā Aerodrome

the district plan acoustic insulation standards for habitable room. This would reflect the recommendations of NZS6805:1992 and support district plan Policy TP8 which seeks to manage effects associated with the operation of the Bridge Pā Aerodrome on adjoining activities.

Noise Emission Limits

PREC1- S11 “Noise” sets out limits on noise emitted by activities undertaken within PREC1. A new rule (25.1.6Dx Heretaunga Golf & Leisure Precinct) is proposed to apply to all land uses within the Heretaunga Golf & Leisure Precinct other than those exempted in Rule 25.1.6B. Proposed standard PREC1-S11 sets the following noise standards shall not be exceeded at any point beyond the site boundary:

Control Hours	Noise Level
0700 to 1900 hours	55 dB LAeq(15 min)
1900 to 2200 hours	50 dB LAeq (15 min)
2200 to 0700 hours the following day	40 dB LAeq (15 min)
2200 to 0700 hours the following day	75 dB LAF max

In addition, proposed SARZ (Sport And Active Recreation Zone) provisions includes limits on noise emitted by activities undertaken within this zone. A new rule (25.1.6H Open Space Zones, and Sport & Active Recreation Zone) sets out noise limits proposed to apply to noise generated by activities taking place in the Open Space and Active Recreation Zone, other than those exempted in Rule 25.1.6B:

The proposed new noise rule are applied at any point within any Residential Zone or within the notional boundary of any noise sensitive activity:

Control Hours	Noise Level
0700 to 1900 hours	55 dB LAeq(15 min)
1900 to 2200 hours	50 dB LAeq (15 min)
2200 to 0700 hours the following day	45 dB LAeq (15 min)
2200 to 0700 hours the following day	75 dB LAF max

It is not known why there is a 5 dB difference between the night time noise limit applying within these two sets of noise limits. Overall, it is not considered necessary to stipulate new noise limit tables for inclusion in district plan noise chapter (as proposed) when, in fact, suitable existing noise limits already exist in section 25 of the district plan. Rather than standalone noise limits for the proposed zone and overlay, noise from PREC1 could instead be linked to compliance with existing noise limits for the rural zone (25.1.6D(a)) while noise from the SARZ could be linked to the existing noise limits for the 25.1.6H(a) Open Space Zones. This could be considered a more efficient method for achieving the same outcome.

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I confirm that have prepared this advice in accordance with the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I also confirm the issues addressed in this review are within my area of expertise except where I state that I am relying on the evidence or advice of another person or published reports.

  
**Malcolm Hunt**  
 Bachelor of Science  
 Master of Engineering[mech]  
 RSH Diploma in Public Health

#### APPENDIX A – CONSULTANT QUALIFICATIONS & EXPERIENCE

1. Malcolm holds a Bachelor of Science Degree from Victoria University and a Master of Mechanical Engineering Degree specialising in Acoustics from the University of Canterbury. His 38+ years' experience has comprised assessment of noise-related effects of a wide range of commercial, industrial, transportation, or energy type projects. He has advised on noise control measures through both engineering methods and management plans. He has assessed noise effects within sensitive receiver sites such as residential sites, aged-care facilities, schools and hospitals. In many projects he has provided advice in relation to appropriate building materials and methods to control the intrusion of outdoor noise sources.
2. He is an associate member of the New Zealand Acoustical Society. He has been a member of various national and international acoustic standards committees, and expert working groups regarding environmental acoustics, including transportation noise. He has been a number of past New Zealand Standard's committees for acoustics, including the past New Zealand Standards committees reviewing NZS6801 and NZS6802 [covering the measurement and assessment of environmental noise].
3. In 2011 he was awarded a *Meritorious Award* by Standards New Zealand for involvement in development of New Zealand acoustic standards. He has acted as a noise expert in many Resource Consent Hearings, District Plan Hearings, Environment Court, High Court Hearings and Boards of Inquiry.
4. He has developed experience in the technical evaluation of aircraft noise and planning proceedings relating to airport noise. He has provided on-going noise advice to Wellington International Airport between 1993 and 2009 and managed various automated aircraft noise monitoring systems at this airport. He has also wide experience with "hands on" measurements of noise from fixed-wing aircraft and helicopters at a number of airports and aerodromes in New Zealand. He has general knowledge and experience with the aircraft noise prediction programs.
5. In addition to work at Wellington International Airport, Malcolm has been involved with noise investigations at other airports as follows:
  - Palmerston North Airport
  - Queenstown Regional Airport
  - Gisborne Regional Airport
  - Whangarei Regional Airport
  - Nelson Regional Airport
  - Ardmore Airstrip
  - Kaipara Airstrip
  - Thames Airfield
  - Waipukurau Airfield
  - Timaru Airport
  - New Zealand Defence Force Airbases at Ohakea and Whenuapai.



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Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

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Appendix C – Technical Memorandum from Hastings District Council’s 3 Waters Growth and Planning Manager



## MEMORANDUM

**File Ref:** Record Number

**To:** Rowena Macdonald – Sage Planning

**Author:** Vicki Koopal

**Approver:** Kelly Nikora

**Date:** 27 March 2025

**Subject:** Private Plan Change 7 - Hastings Golf Course

### Introduction

A development has been proposed for the Hastings Golf Club, located at 1523 Maraekakaho Road near Bridge Pa. Previous modelling has indicated that the water supply pressure in Maraekakaho Road and the water level in the Bridge Pa Reservoir will remain at acceptable levels with the addition of the demand for this proposed subdivision. This was outlined in the report 'Hastings Golf Club Development Modelling Aug 2024' (August 2024).

The previous modelling was carried out for a peak demand day of 54,700 m<sup>3</sup>/day and the peak demand day over the summer of 2024/2025 was 61,000 m<sup>3</sup>/day. The analysis needed to be carried out using this higher demand. An assessment of the ability to provide a 25l/s fire flow at the connection to the development in Maraekakaho Road was also required.

This report outlines the modelling carried out to determine the effect of the higher demand day, along with the fire flow analysis.

#### Exclusions

Note that a response to wastewater and stormwater submissions does not form a part of this memorandum as Hastings District Council does not provide wastewater and stormwater services for this area and the surrounding communities and there are no plans to do so in the future. As such, Hawkes Bay Regional Council are the regulatory authority for the proposed wastewater and stormwater infrastructure servicing solutions.

### Background

#### Current Model

The model used in the assessment was from the Flaxmere/Hastings/Havelock North model M06 04 model series. This model was originally set up to represent the proposed network with the Frimley and Waiaroha WTP's operational. It was used as a base and the operation of these



WTP's, and the Havelock North Booster Pump Station was updated to represent what is occurring currently. The base model pipes and demand are from 2018.

The total demand in this model was scaled up to 61,000 m<sup>3</sup>/day, which represents a peak demand day experienced in early December 2024. The pressure settings at the Waiaroha, Frimley, and Wilson Road WTP's from this time were used in the model, as were the flow settings at the Havelock North Booster Pump Station.

Comparisons with the available SCADA data show the model result is a reasonable match with what is actually occurring. The flows over the railway line were also checked and showed a good match.

This model includes the Bridge Pa Reservoirs and Pump Station and the supply to Paki Paki. The Bridge Pa Pump Station and Reservoir are operational with all Bridge Pa demand supplied through this. There is a pressure sustaining valve prior to the reservoir that prevents the Bridge Pa Reservoir filling if the pressure upstream of the valve is less than 40m.

In the model the pipework through Irongate is open and can supply Bridge Pa and Paki Paki from Hastings, but the cross connection between the two pipes in Stock Road is closed.

### Proposed Development

The proposed development is at the Hastings Golf Club, located at 1523 Maraekakaho Road near Bridge Pa. The location of this is shown on Figure 1.

There is currently a 200mm dia pipe in Maraekakaho Road that provides water to Bridge Pa and Paki Paki from Flaxmere and Irongate. The proposed development will be connected into this pipe.



Figure 1: Hastings Golf Club Development Location



The total development will have 170 properties, and a proposed layout is shown in Figure 2.



Figure 2: Hastings Golf Club Development Proposed Layout

## Model Scenarios

There is potential to construct the proposed development in stages, therefore scenarios were created to represent 25%, 50%, 75%, and 100% of development. Table 1 shows the number of houses modelled for each stage.

Percentage Developed	Number of Houses
25	43
50	85
75	128
100	170

Table 1: Hastings Golf Club Development Stages

To calculate the water use for each property a consumption of 400 litres/person/day was multiplied by 3.5 people per house, to give a consumption per property per day of 1,400.

### Fire Flow Analysis

A fire flow is represented in the modelling software using an exceptional flow. The fire flow required for a residential development is 25l/s with a residual pressure of 10m. The fire flow was applied in Maraekakaho Road on the node that the development connection is closest to.



The fire flow was applied for two hours from 3:00pm to 5:00pm. This time was chosen as it coincides with the time that the Bridge Pa Reservoir was at the lowest point in its operating cycle, so will be the worst-case scenario for the reservoir level.

The modelling software also has the option to remove consumer demand at the node the fire fighting flow is applied on, to represent a reduction in water use near the fire while it is burning. In this exercise the local demand was kept on the node to be more conservative.

## Results

### At Peak Demand

Figure 3 shows the pressure at the Hastings Golf Club connection for the existing conditions and for each of the four stages on the peak demand day of 61,000 m<sup>3</sup>/day. This shows that there is not a substantial difference in the pressure between any of the staging options. The pressure is always above 40m.

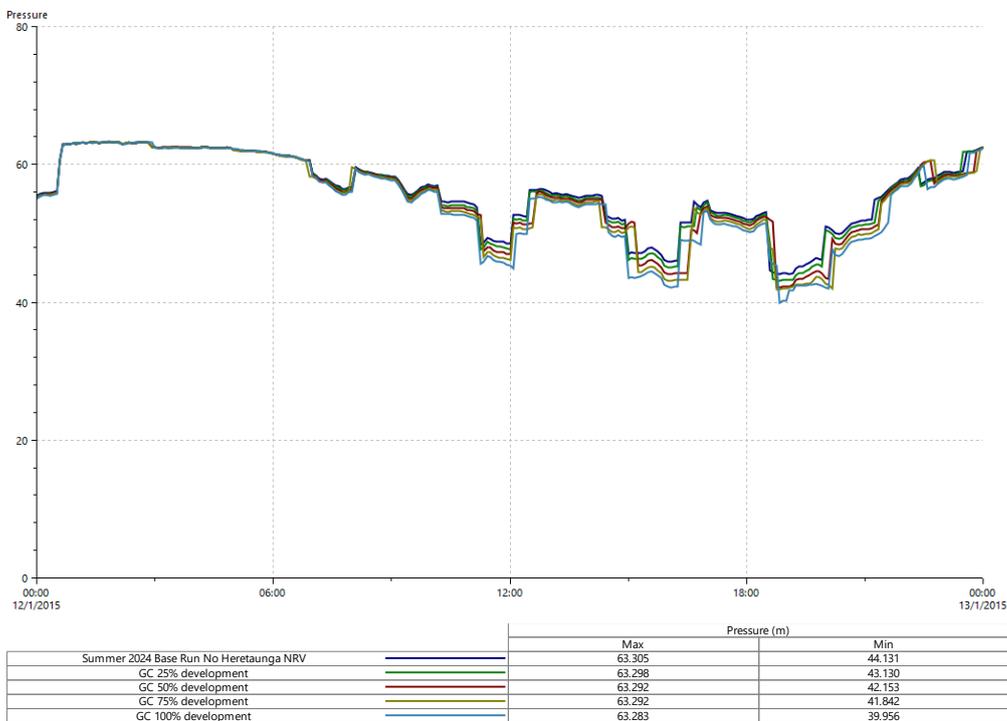


Figure 3: Pressure at Hastings Golf Club Development – 61,000 m<sup>3</sup> Demand Day



Figure 4 shows the water level in the Bridge Pa Reservoir for the existing condition and for each of the four scenarios. On the peak demand day, the reservoir water level is maintained between its set points.

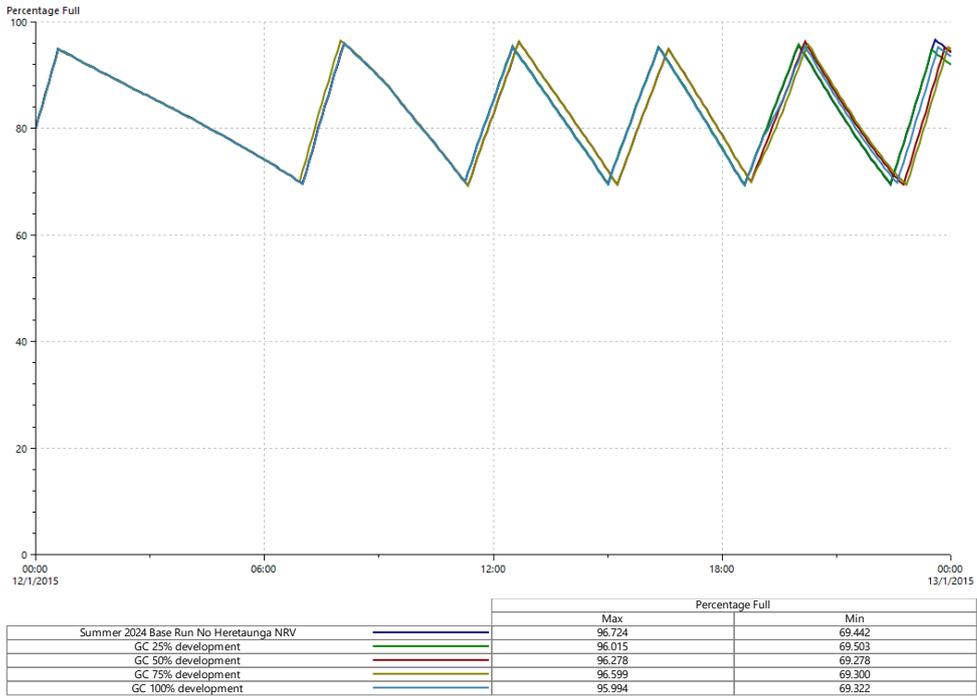


Figure 4: Water Depth in Bridge Pa Reservoir – 61,000 m<sup>3</sup> Demand Day



Figure 5 shows the water level in the Paki Paki Reservoir for the existing condition and for each of the four scenarios. On the peak demand day, the reservoir water level is maintained between its set points.

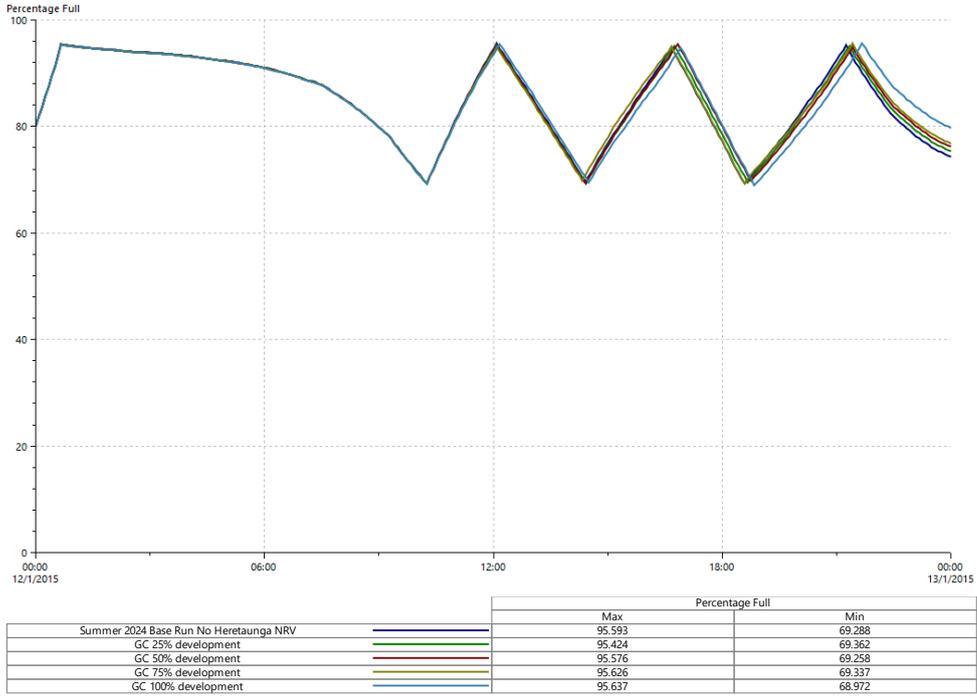


Figure 5: Water Depth in Paki Paki Reservoir – 61,000 m<sup>3</sup> Demand Day



### Fire Flow Analysis

The fire flow analysis was carried out for the base scenario and for the fully developed subdivision.

Figure 6 shows the pressure at the Hastings Golf Club connection with the fire flow between 3:00pm and 5:00pm on the peak demand day of 61,000 m<sup>3</sup>/day. This shows that a residual pressure of over 10m is maintained during the fire flow. The residual pressure is lower when the subdivision is fully developed but still well above the requirement.

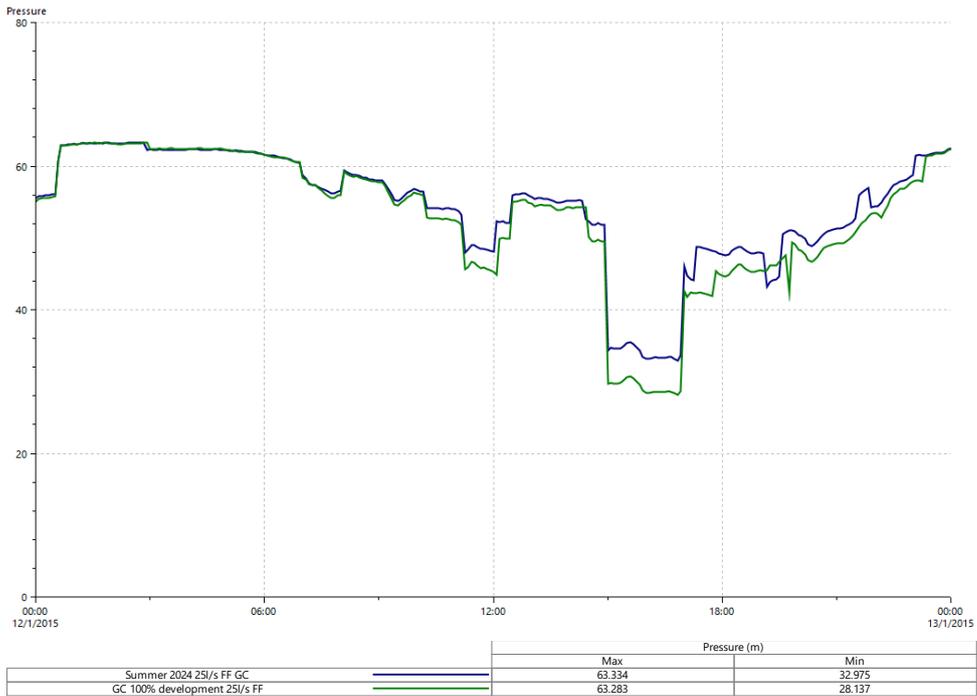


Figure 6: Pressure at Hastings Golf Club Development – 61,000 m<sup>3</sup> Demand Day, 25 l/s fire flow

During the fire flow the pressure drops below 40m, therefore the Bridge Pa Reservoir is unlikely to be filling during this time.



Figure 7 shows the water level in the Bridge Pa Reservoir for the existing condition and for the fully developed subdivision. On the 61,000 m<sup>3</sup> demand day, with the 25 l/s fire flow starting when the reservoir is at its lowest operating level (70%), the reservoir water level will drop to just under 50% for a short period of time. There is no discernible difference in the lowest level between the current setup and the fully developed subdivision, but the reservoir does recover slightly slower with the development.

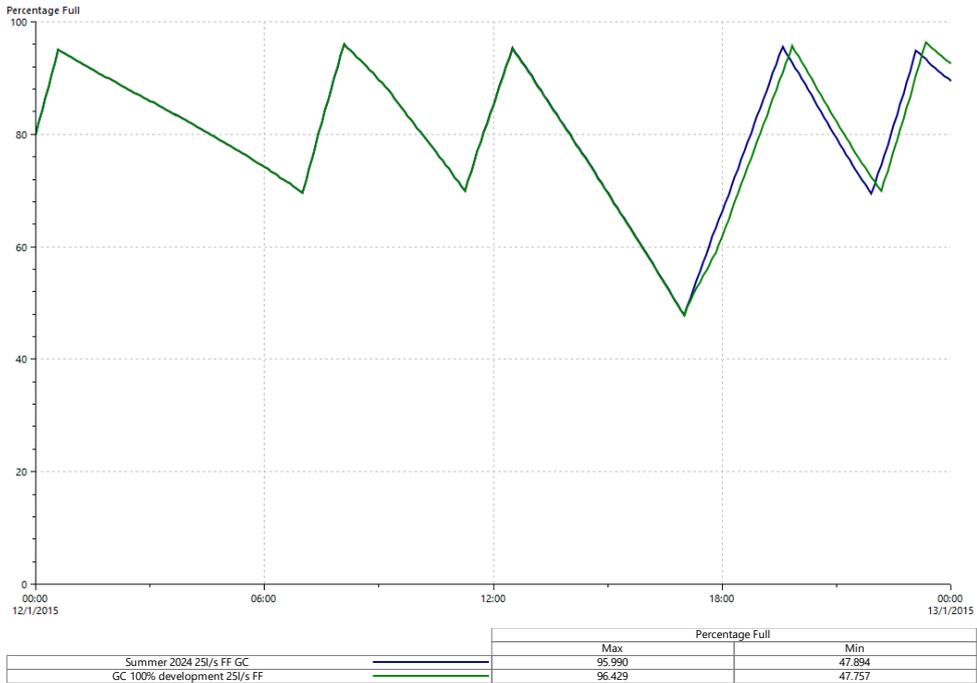


Figure 7: Water Depth in Bridge Pa Reservoir – 61,000 m<sup>3</sup> Demand Day, 25 l/s fire flow



Figure 8 shows the water level in the Paki Paki Reservoir for the existing condition and for the fully developed subdivision. This reservoir will still fill during the fire flow, it is just at a lower rate than normal. The level does not drop outside of the normal operating zone.

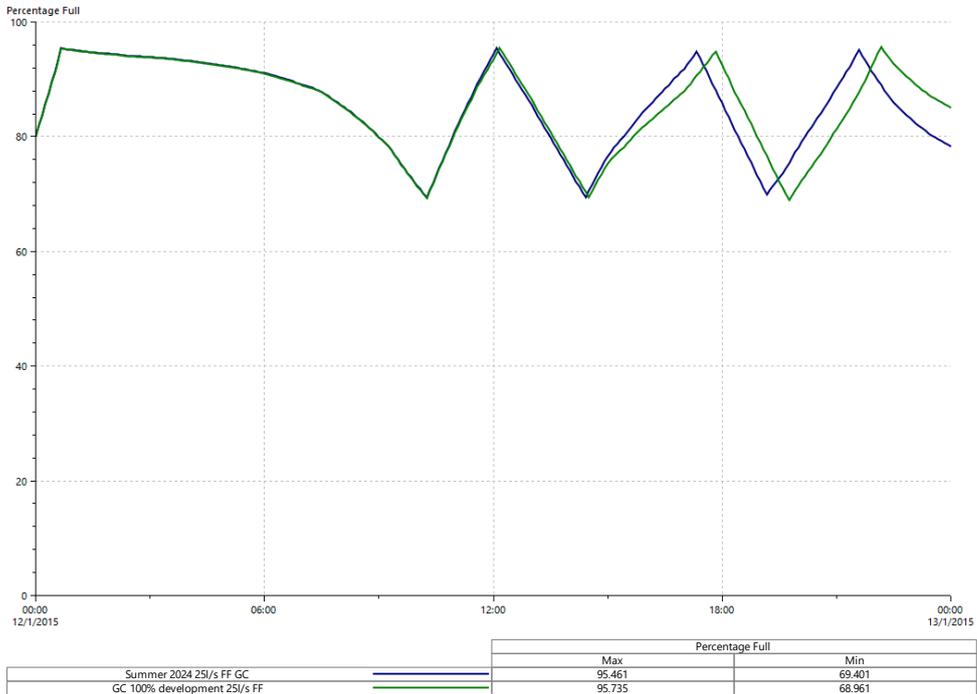


Figure 8: Water Depth in Paki Paki Reservoir – 61,000 m<sup>3</sup> Demand Day. 25 l/s fire flow

## Review of Submissions

A number of submitters expressed concerns regarding the 3 waters infrastructure implications of the proposed residential development at the Hastings Golf Club site.

- S56.2 and S 96.3: It is noted that submissions will be addressed by Hawkes Bay Regional Council who will be the regulatory authority in assessing and approving the wastewater treatment plant including its location and proximity to neighbouring properties and subsequent discharge consent approval.
- S57.3, S58.2, S61.3 and S96.3: It is noted that these submissions relate to ground water capacity and recharge, however the water supply will be via the HDC reticulation network.
- S92.1: Modelling investigations demonstrate that the network supports a 25 L/s fire flow with residual pressure above 10m, which is the required minimum.
- S66.2 and S62.4: Modelling investigations demonstrate that the current network has the capacity to service peak development during peak season, peak hour demand without adverse impacts on network and existing communities.



## Conclusions

While the proposed development will introduce additional demand on the water supply network, hydraulic modelling confirms that this additional load will not have an adverse effect on surrounding communities.

System pressures remain within acceptable limits, and both the Bridge Pa and Paki Paki reservoirs retain sufficient capacity to meet current supply needs.

Importantly, firefighting requirements can still be met, with residual pressures and available flow remaining above the minimum threshold during a 25 L/s fire flow event, even under peak demand conditions.

The infrastructure, as currently configured, has the resilience and capacity to accommodate the full development without compromising service levels or emergency response capabilities.

A handwritten signature in black ink, appearing to read "Kelly Nikora".

Kelly Nikora

**3 Waters Growth and Development Manager**



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Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

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Appendix D – Technical Memorandum from Hastings District Council’s Transportation Policy and Planning Manager



## MEMORANDUM

File Ref: Record Number

To: Rowena Macdonald – Sage Planning

From: Bruce Conaghan

Date: 4 April 2025

Subject: Private Plan Change 7 – Hastings Golf Course

### Introduction

Golf Sport Development Limited Partnership has requested a change to the Hastings District Plan (Private Plan Change 7) to rezone approximately 82.12 hectares land situated at 1523 Maraekākaho Road, Bridge Pā (Hastings Golf Course) from Plains Production Zone to 'Sport and Recreation Zone' with a 'Heretaunga Golf and Leisure Precinct', which includes housing and accessory development. The site proposes a new clubhouse, associated golf and leisure facilities and buildings, four golf holes, and a new driving range. Also to be accommodated within the site are a mix of residential dwellings and visitor accommodation, with 170 units developed in total. The proposed development is shown in Figure 1 below.

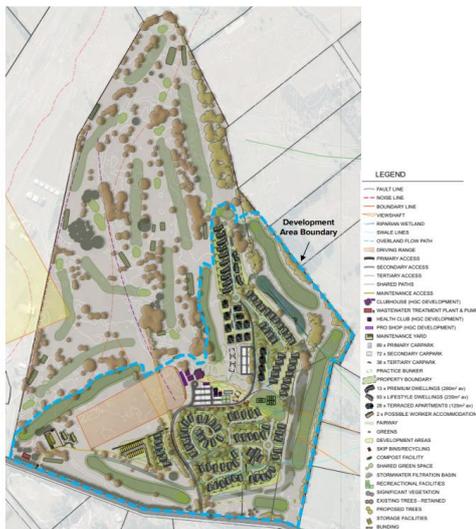


Figure 1 : Proposed Development

The purpose of this memorandum is to provide a review of the transportation impacts and to provide a response on the submissions received.

## Review of the Traffic Impact Assessment

Urban Connection Limited provide a detailed description of the existing traffic and roading environment at the site as part of their Traffic Impact Assessment ("TIA") report dated 4 October 2023.

With respect to future trip generation estimates, the TIA adopted a highly conservative approach where the following "worst case" assumptions were applied to the effects assessment:

- That existing peak golf related traffic coincided with maximum estimated residential and visitor accommodation related traffic; and
- That peak golf related traffic does not change, whereas, as a result of the expectation that a number of existing club members will reside on site in future, and the fact that there will be no future increase in club members (i.e. the club is currently full so no additional golfers can physically play on the course in future), it is more likely that future golf related traffic will actually reduce as a result of this development; and
- That all residential housing is occupied, whereas there is the potential of up to approximately 20% of the proposed residential units being available for short term visitor accommodation, it is more likely that, at any one time, a number of future dwellings will be vacant; and
- That the occupation rate for short stay visitor accommodation is 100%, whereas this level of occupation is considered to be rare; and
- That all people visiting or leaving the site are doing so by road vehicle, whereas it is expected some people will utilise the shared path along Maraekakaho Road for cycling to nearby wineries or for general exercise; and
- That future site will employ 20 staff compared to the existing site which employs less than 10 people.

The total traffic generation of the proposed development is expected to be approximately 1,642 vehicles per day ("vpd") and 273 vehicles per hour ("vph") in the peak hour. Approximately 1,232 vpd and 181 vph in peak hours are additional trips to be generated primarily by the residential development at the site. 410 vph and 92 vph in the peak hour relate to the site's existing use

The TIA makes the following key conclusions in respect of traffic effects associated with the proposed development:

- While the peak hour traffic flows at the site are likely to coincide with the surrounding network peak, the development's traffic flows are expected to be absorbed in adjacent intersections and the existing roading network.
- The preliminary internal roading layout design is considered to meet the existing objectives of the Hastings District Plan.
- With the additional traffic generation, a right-turn bay is proposed at the main accessway to maintain and enhance safety performance.
- Minimum sight distance requirements are achieved at both future vehicle accesses.
- One adjacent vehicle access is located within the minimum separation distance given by the Hastings District Plan. However, this is considered to have less than minor adverse effects due to clear intervisibility between turning vehicles and relatively low volumes from the adjacent site.

From the overall assessment, the recommendations from the TIA are pertinent and the following will be necessary for the proposed development:

- A right-turn bay is provided on Maraekakaho Road at the site vehicle access as per the Concept Access Design in the TIA;
- Street lighting is to be provided, which should adequately light the whole right-turn bay, including the tapers, and the shared path;
- Markings and signage for high-use driveways are installed at the site vehicle access onto Maraekakaho Road to highlight the shared path crossing;
- Advance warning signs (intersection ahead) are also recommended to be provided;
- Speed humps are installed for vehicles exiting the site at both the primary and maintenance vehicle accesses onto Maraekakaho Road;
- Stop control to be installed at the primary site access onto Maraekakaho Road;
- Vegetation trimming/removal is undertaken to ensure that a SISD of 248 m is achieved to the west at the primary vehicle access with Maraekakaho Road;
- The road carriageway for access roads serving more than six dwellings is to be widened to 5.5 m wide;
- Speed management measures be provided to ensure that on-site vehicle speeds are limited to a maximum of 30 km/h;
- A Traffic Management Plan is prepared for events/tournaments that take place at the site.

Additionally, there are no other traffic engineering or traffic planning reasons to preclude the approval of the proposed development.

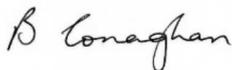
### Review of Submissions

A total of 4 submissions related to traffic were received. 3 of the submissions (S53, S59, S62) related to increased traffic volumes and safety on Maraekakaho Road while 1 (S19) was more general in respect of increased traffic and congestion at peak times with a focus on reducing traffic.

There is little that can be done about the increased traffic volumes on Maraekakaho Road as these will continue to increase as activity changes or increases to the west. However, given the nature of the proposed development and traffic generation in the TIA, the majority of traffic entering or leaving the proposed development will be from the east meaning that the increase in traffic through Bridge Pa would be expected to be small.

A dedicated right turn bay on Maraekakaho Road to serve the proposed development will be necessary to improve safe access to the site. This is to be complemented with streetlighting to provide a safer road environment at night-time for both the access and the cycle path.

With the submission related to increased traffic and more congestion at peak times, the site location and traffic generation is unlikely to impact on either the peak hour traffic in this area or on the wider road network. The broader concern about roads in and out of Hastings raised though has been noted.



Bruce Conaghan

**Transportation Policy and Planning Manager**

[brucec@hdc.govt.nz](mailto:brucec@hdc.govt.nz)

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Section 42A Report for Private Plan Change 7: Hastings Golf Course Rezoning

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Appendix E – Legal Memorandum from Hastings District Council’s Legal Counsel



## memo

**TO:** Rowena Macdonald, Reporting Officer for Hastings District Council

**DATE:** 23 April 2025

**SUBJECT:** Private Plan Change 7 – Legal Issues

### Introduction

1. I have been asked to assist in the preparation of a s 42A report for Private Plan Change 7 – Hastings Golf Course (**PPC7**) by providing a summary of relevant caselaw and a legal opinion as to its application. The issues on which I have been asked to advise relate to the application of the National Policy Statement on Highly Productive Land (**NPS-HPL**), specifically:
  - (a) Whether the area of highly productive land (**HPL**) within the subject site is determined by the LUC maps or the more detailed soils mapping undertaken for the applicant by LandVision; and
  - (b) The approach of the Environment Court to applying cl 3.6 NPS-HPL when rezoning land comprising HPL.

### Area of HPL

2. Prior to Hawke’s Bay Regional Council undertaking mapping of HPL, the NPS-HPL provides an interim definition whereby land must be treated as HPL if it meets certain criteria, including land that “*at the commencement date...is...LUC 1, 2, or 3 land*” (cl 3.5(7)(a)(ii)).
3. “*LUC 1, 2, or 3 land*” is defined as “*land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory or by any more detailed mapping that uses the Land Use Capability classification*” (cl 1.3).
4. In the period immediately following the NPS-HPL coming into force, there was debate as to whether the words “*more detailed mapping*” allowed applicants for consent or rezoning to undertake site specific analyses to refute the LUC status of land otherwise identified in the NZLRI. The applicant for PPC7 took this position in its application, where at p 140 it notes:

... during the transition period ..., there is the opportunity for site specific reports to confirm or update the LUC classification on the basis that:

  - The NZLRI LUC maps adopted during this transition period are high-level and until the remapping exercise has been completed by the Council a site-specific LUC assessment could confirm the LUC classification in more detail than relying on the high-level mapping as is appropriate;
  - Such a more detailed LUC assessment could go either way – show less or more LUC 1-3 land across the site (so at landowner’s risk); and
  - The MfE guidance document on the NPS - HPL states: “Detailed site- specific assessments may be provided and considered as part of a resource-consent application or rezoning process”.

- In this instance, therefore, a site-specific assessment report has been undertaken by LandVision. The report has completed a full site analysis using the Land Capability classification and confirms that the site is predominantly LUC Class 4 and 6.
5. The application nevertheless included some minor commentary on the NPS-HPL, and further information was provided in response to Council's request that the relevant tests be addressed.
6. It may be that the applicant now accepts its initial approach was incorrect, but for completeness, I summarise the Environment Court's decision in [Blue Grass Ltd v Dunedin City Council](#)<sup>1</sup> which confirms the correct approach to be applied to the definition of HPL in the transitional period.
7. In *Blue Grass*, the Court considered the preliminary question (at [2]):
- [C]an more detailed mapping undertaken since 17 October 2022 [LUC] classification prevail over the identification of land as Land Use Capability Class 1, 2, or 3, as mapped by the [NZLRI] and determine for the purposes of cl 3.5(7) of the NPS-HPL whether land is [HPL]?
8. The Court at [47] repeated findings made in any earlier decision<sup>2</sup> concerning the application of the NPS-HPL that:
- (a) the transitional provisions can be assumed to take a deliberate holding position;
- (b) the clear intention of the NPS-HPL is that HPL is not to be given any kind of planning permission for development for urban or lifestyle purposes before the mapping exercises are completed and given effect to; and
- (c) during the transitional period the court is obliged to have regard to the NPS-HPL in considering appeals.
9. From that starting point, the Court accepted the argument that if land was classified as LUC 1, 2 or 3 at the commencement date (17 October 2022), then a later mapping exercise could not change the land's status as HPL. It rejected the argument that the reference in cl 3.5(7)(a) to "at the commencement date" applied to the state of the land at that time (such that if it was later proved to not be LUC 1, 2, or 3 land, it would then not be HPL) (at [50]).
10. The rationale for that approach was set out at [51], with the Court noting the interpretation:
- (a) accords with the intention of the NPS-HPL to protect HPL for primary production (particularly during the transitional period);
- (b) is also in accordance with the intention of the NPS-HPL that the proper process for determining what land will ultimately be mapped as HPL is the Schedule 1 RMA process, and not an ad-hoc process undertaken by private landowners as suggested by the appellants;
- (c) does not, in my opinion, introduce retrospectivity. The NPS-HPL applies from its commencement date. Whether the land is considered HPL for the purposes of the transitional period is also to be ascertained at the commencement date. There is instead an element of retrospectivity in the appellants' arguments — if the 'state of the land' is to be ascertained as at the commencement date, but by assessments occurring after that date, that means that the status as HPL would be retrospectively amended;
- (d) does not 'freeze' or 'sterilise' the land: it means that, during the transitional period, the relevant land will be treated as HPL. The appellants are not prevented from obtaining more detailed assessments of the land during that period. Those assessments can be fed into the mapping process that regional councils must undertake;
- (e) does not introduce 'nonsensical' outcomes. The evidence presented is that the LUC classification in the NZLRI can be ascertained as at the commencement date. In contrast, if it was open to landowners to obtain more detailed LUC classifications of their land at any time (but assessed as it existed at the commencement

<sup>1</sup> [2024] NZEnvC 83 (*Blue Grass*).

<sup>2</sup> *Balmoral Developments (Outram) Ltd v Dunedin City Council* [2023] NZEnvC 59 (*Balmoral*)

date) then the status of the land as HPL could change and change repeatedly throughout the transitional period in an ad-hoc manner. There are no mechanics in the NPS-HPL to show how a site-specific assessment is then received and the manner in which it changes the transitional status;

- (f) does not render the words ‘or by any more detailed mapping’ otiose. The definition of LUC 1, 2 or 3 land in cl 1.3 of the NPS-HPL applies to all references to LUC 1, 2 or 3 land in the NPS-HPL. It does not apply only to the transitional period meaning of HPL in cl 3.5(7). ‘More detailed mapping’ after the commencement date might reveal that the land is or is not LUC 1, 2 or 3 land. However, the purpose of the NPS-HPL and in particular the transitional period, is that any new information concerning LUC classification is to be fed into the Schedule 1 mapping process to be undertaken by regional councils. Clause 3.4(5) (for example) anticipates that a regional council might accept any more detailed mapping (that uses the LUC classification).”

11. The decision in *Blue Grass* makes clear that the area of land identified as LUC 3 as at 17 October 2022 must be treated as HPL for the purposes of an assessment against the NPS-HPL.<sup>3</sup> LandVision’s “more detailed mapping” was not available at the commencement date and the LUC 3 status cannot now be revisited.

#### Judicial application of clause 3.6 NPS-HPL

12. Given that there is a significant quantity of HPL within the subject site, the NPS-HPL is a relevant planning document which Hastings District Council is required to “give effect to” (s 75(3)(a) RMA). The objective, policies and clauses will be addressed in detail in the s 42A report.
13. To assist in that assessment, I have been asked to summarise case law which has considered the test for rezoning HPL for urban purposes, as set out in cl 3.6 NPS-HPL. The cases addressed are:
- (a) [Drinnan v Selwyn District Council](#) [2023] NZEnvC 180 (*Drinnan*);
- (b) [Save the Maitai Inc v Nelson City Council](#) [2024] NZEnvC 155 (*Maitai*); and
- (c) [Gardon Trust v Auckland Council](#) [2025] NZEnvC 058 (*Gardon*)
14. I have also commented briefly on the application of these decisions to the issues raised by PPC7, however have not undertaken a full legal analysis. The Council may still wish to present legal submissions at the hearing should there be matters of dispute at that time. In this regard I note that the *Gardon* decision was not available at the time the request for PPC7 was made and has not to date been addressed by the applicant. No doubt this will be done through evidence and/or legal submissions at the appropriate time.
15. For ease of reference, the relevant parts of cl 3.6 are as follows:

#### 3.6 Restricting urban rezoning of highly productive land

- (1) Tier 1 and 2 territorial authorities may allow urban rezoning of highly productive land only if:
- (a) the urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020; and
- (b) there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and
- (c) the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
- (2) In order to meet the requirements of subclause (1)(b), the territorial authority must consider a range of reasonably practicable options for providing the required development capacity, including:
- (a) greater intensification in existing urban areas; and

<sup>3</sup> Note that the Court’s analysis was accepted by Judge Hassan’s division of the Court in *Save the Maitai v Nelson City Council*, discussed below – see Appendix 1, para [44]. Judge Smith’s division in *Gardon Trust v Auckland Council* at [58] also accepted, with reference to *Balmoral*, that “pending identification of the land by the Council its Land Use Classification as LUC 2 and LUC 3 is sufficient to determine it is highly productive land”.

- (b) rezoning of land that is not highly productive land as urban; and
  - (c) rezoning different highly productive land that has a relatively lower productive capacity.
- (3) In subclause (1)(b), development capacity is within the same locality and market if it:
- (a) is in or close to a location where a demand for additional development capacity has been identified through a Housing and Business Assessment (or some equivalent document) in accordance with the National Policy Statement on Urban Development 2020; and
  - (b) is for a market for the types of dwelling or business land that is in demand (as determined by a Housing and Business Assessment in accordance with the National Policy Statement on Urban Development 2020).
- ...
- (5) Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.

*Drinnan*

16. *Drinnan* concerned whether a 2.2-hectare block of land owned by the appellants near Prebbleton in Canterbury should be included in a plan change (PC72) to rezone land for urban residential development. The block in question contained LUC 1 soils and had been excluded from PC72, primarily due to the NPS-HPL.
17. The Court accepted that the size and location of the land meant it would possibly, if not probably, be zoned for urban use following the required regional council mapping exercise (at [10]) but in the meantime the urban rezoning of HPL was required to be avoided except in accordance with the NPS-HPL ([11]).
18. The Court considered evidence on demand for housing in Prebbleton, and development capacity expected to be provided over the short to medium term (i.e. the next 10 years). It concluded at [66] that there was already adequate feasible plan enabled development capacity to meet housing demand by some margin and there was therefore, no “requirement” to include the *Drinnan* land in PC72. The Court held that “*having failed at the first hurdle*”, there was no need to assess subclauses (a) and (b) given the conjunctive nature of the tests (at [66]).
19. While the failure to meet criterion (a) was determinative, the Court did, however, briefly address the test in cl 3.6(1)(b) as to whether the development capacity identified in the Prebbleton market was “feasible”, within the meaning of cl 3.6(1)(b). It considered whether the need for a new wastewater pump station to deal with rezoning beyond two known plan changes meant that such development might not be “feasible”. The court accepted evidence that the need to install new infrastructure would not be a “dealbreaker” and upgrades would be “manageable”.
20. I note here that the Court considered supply and demand in Prebbleton, being the market to which the appellants’ land would contribute to, rather than the wider Selwyn area or the Greater Christchurch area which was covered by the Housing and Business Capacity Assessment. The reason for this is not discussed in the decision but appears to have been assumed by all parties as correct. I note this because it is consistent with the approach later taken in *Gardon* discussed below, which held that both cl 3.6(1)(a) and (b) should both consider the same “locality and market”, which in *Drinnan* was Prebbleton.
21. Relevant points for PPC7 include:
- (a) The NPS-HPL puts in place a “very high bar” to rezoning HPL with the tests to be applied strictly;
  - (b) That the tests in cl 3.6(1) are conjunctive. Failing one is sufficient to prevent the rezoning – there is no balancing to be undertaken.
  - (c) The assessment under cl 3.6(1)(a) should be focused on the locality and market to which the proposed housing will contribute. Presumably this is Hastings, however the land’s physical separation means it would not form part of the Hastings urban area, so in my view, this presents a challenge, which is discussed further below in relation to *Gardon*;

(d) If one of the criteria in cl 3.6(1) cannot be met, the rezoning the land is contrary to the NPS-HPL.

*Maitai*

22. *Maitai* concerned a plan change to rezone mostly rural land to the northeast of Nelson City to residential and open space. The appeal concerned two issues, one of which was whether the NPS-HPL precluded the rezoning of two areas of HPL that had been included in the plan change. At [15](d), the Court held that the NPS-HPL applied to both regional and district plans (the plan in question being a combined plan and “[t]herefore, the court must satisfy itself that approving PPC28 will give effect to the NPS-HPL”).
23. At [10] of Appendix 1,<sup>4</sup> the Court described the NPS-HPL as operating “as a moratorium on the rezoning and development of HPL until the assessment under cl 3.6 and following has taken place”. There were various arguments about whether the land was HPL for the purposes of the NPS. The full plan change area had, for instance, been identified in the Future Development Strategy for urban development, which was in force at the NPS-HPL’s commencement date. However, the FDS did not give a timeframe for development and this was only clarified in the later Implementation Plan. In the absence of a clear indication in a strategic planning document in force at the commencement date that land would be developed in the next 10 years, the exclusion in cl 3.5(7)(b)(i) was not met (see discussion [76] – [88]).
24. The outcome of the Court’s analysis was that one of the two areas was excluded, due to not having a Rural or Rural Production equivalent zoning. However the other area, known as Walters Bluff, was treated as HPL and the test under cl 3.6 needed to be applied to that land.
25. The Court did not receive evidence on the tests in cl 3.6 and was not satisfied that the statutory tests were satisfied. Inclusion of the land in the FDS was insufficient to address the cl 3.6 tests.
26. From [101] it held:

We have already noted that the NRMP must “give effect to” the NPS-HPL. The relevant provisions in the NPS-HPL are highly directive. Objective 2.1 provides:

“Highly productive land is protected for use in land-based primary production, both now and for future generations [our emphasis]”

Policy 5 which deals specifically with rezoning provides:

“The urban rezoning of highly productive land is avoided except as provided for in this National Policy Statement. [our emphasis]”

These provisions set a very high bar to meet the statutory obligation in ss 75(3) and 67(3) for the NRMP to give effect to the NPS-HPL.

PPC28 must treat the Walters Bluff area in a way that gives effect to the NPS-HPL. We find that the most appropriate way to deal with the Walters Bluff area is for it to retain its current Rural zoning.

27. Relevant points for PPC7 include:
  - (a) The decision makers must be satisfied that the tests in cl 3.6 are met – this places the evidential onus on the applicants to persuade the Panel that each of the three criteria are satisfied;
  - (b) If the land is included in the FDS (noting that at the time of drafting, no decisions had been made on the final content of this document), the tests in cl 3.6 still need to be fully addressed.

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<sup>4</sup> The Court’s findings on the application of the NPS-HPL are mainly included in Appendix 1 of the judgement, and paragraph references are to the appendix.

*Gardon*

28. *Gardon* concerned a private plan change to provide 30 hectares of urban land for housing to the south / southwest of Waiuku Township to provide approximately 750 homes and specialised housing for aged residents (at [44]). The request had been declined at first instance by commissioners, and the Council opposed the appeal on a number of bases, including failure to meet the requirements of cl 3.6 NPS-HPL, the subject site being comprised of LUC 2 and 3 soils.

29. The Court upheld the appeal and summarised its approach early on as follows (from [13]):

The NPS-HPL provides for certain exceptions to the use of land containing elite and prime soils for residential purposes. To be clear, this Court agrees that such exceptions should be applied strictly, and all sub-requirements must be met in order that the application meets the necessary tests.

Nevertheless, we have concluded, for the reasons which we will go into in some particular detail, that the tests are not intended to exclude all development on elite and prime soils, and that where a proper exception is established, an allowance should be made on a reasonable basis.

For these reasons, we conclude this minor extension, which will allow the development of 30 hectares directly adjacent to the Waiuku township, is an exception and also forms a sound planning approach to an existing well-functioning urban area. It will assist in consolidating the town centre and the utilisation of its facilities.

30. The judgment contains a detailed assessment of the tests in cl 3.6, including the relationship between those tests and the National Policy Statement on Urban Development (NPS-UD).

31. A key finding was that the term ‘locality and market’ was relevant to *both* cl 3.6(1)(a) and (b). That is, the first task is to consider the locality and market and the next was to consider, first, whether there was sufficient development capacity, and second whether there were other options to better provide that capacity.

32. One such close analysis was of the terms “locality and market” used in cl 3.6(2). The Court considered at [167] that:

It is worth noting the use of the phrase ‘within the same locality and market’, and particularly the use of the word ‘within’. To us, this signals clearly that the concept of ‘locality’ is distinct from that of ‘location’ in that it implies an explicitly defined spatial extent of an area, as distinct from a point on a map or an undefined area. Defining the spatial extent of a locality is clearly essential to any exercise of assessment of housing demand, housing supply, development capacity and well-functioning urban environment.

33. It held that defining the spatial extent of a locality was essential to assessment of housing demand, supply, development capacity and well-functioning urban environments and related parameters (at [169] and that this was critical to determining whether the exception test in the NPS-HPL was met (at [170]). Considering a range of evidence the Court concluded (at [222](d) and (e), emphasis added):

The Court disagrees strongly with the spatial extent adopted by Dr Fairgray and Ms Trenouth of the ‘same locality and market’ being the West Franklin area, principally because it seems to be totally blind to the important requirement that any urban growth promoted under the NPSUD should provide for a well-functioning urban environment. Therefore, if it is to provide for urban growth to meet demand for Waiuku, it needs to be contiguous with Waiuku’s existing urban zoning;

Put another way, if we focus carefully on the wording in NPS-HPL clause 3.6(1)(b) “sufficient development capacity within the same locality and market while achieving a well-functioning urban environment”, the clause refers to ‘a well-functioning urban environment’ (singular) and therefore it is illogical that the Council would consider including fragments of development capacity from elsewhere in West Franklin in its assessment calculations in order to imply that sufficient development capacity does potentially exist. And there are only two ‘urban environments’ in West Franklin – Pukekohe and Waiuku. As Dr Fairgray has helpfully explained, the more extensive the spatial extent of the defined ‘locality and market’, the less likely that any insufficiency will be identified;

34. From [229], *Gardon* also considered cl 3.6(1)(c) noting:

We do not see the social and economic benefits as being the key weighting item in this case. If that were the case, there would never be an instance where highly productive land could be preserved.

35. The Court considered the land to be indistinguishable from other areas of prime land within the sub-region and considered it, at less than 30 hectares, to be a “small area”. It held (at [232]):

Overall, looking at both the NPS-HPL and NPS-UD, we do not consider that it is intended that all development around towns be precluded simply because they would involve inclusion of land with prime soils. Small areas of land, say less than 40 to 50 hectares, may be justified if they become defensible boundaries. They may also be justified where they add significantly to a well-functioning urban environment already existing.

36. The fact that there were only two towns which constituted urban areas (i.e. populations of 10,000 people) meant that this was not a ‘widespread issue’ (at [234]).

37. At [236] the Court noted that cl 3.6(1)(c) of the NPS-HPL “has already required us to undertake an evaluation of the balancing required under both the NPS-HPL and the NPS-UD and in terms of the broader plan”. It held that the development met cl 3.6 and also clearly met the purpose of the NPS-UD and was “an exemplar” of the type of development anticipated by that policy (at [237]).

38. For the purposes of assessment of PPC7, I note the following matters that will need to be considered:

- (a) As noted, the Court held that the ‘locality and market’ are relevant to both cl 3.6(1)(a) and (b), which in the *Gardon* case was Waiuku. This conflicts with the applicant’s argument that the test in cl 3.6(1)(a) refers (presumably) to Hastings, and the test in cl 3.6(1)(b) refers to a very small subset of demand, namely golf related tourism housing. Applying *Gardon*, the Commissioners will need to identify the ‘locality and market’ in question before undertaking the analysis in cl 3.6 at all, and not only at the cl 3.6(1)(b) stage. I comment here that given cl 3.6(1)(a) refers to development capacity required to meet the NPS-UD, it seems doubtful that supplying demand for golf related tourism housing would be so required – the NPS-UD is simply not directed at that level of granularity and the applicant’s arguments in this regard are not supported by the Court’s approach in *Gardon*.
- (b) In determining the ‘locality and market’ for which there is demand, the tests require that the supply generated by the plan change area satisfy that demand. In *Gardon*, in identifying the locality and market, the Court limited its consideration to the urban area, and excluded smaller housing areas, or ‘fragments of development capacity’ which were separate from Waiuku and separated by rural land. In PPC7, the applicants are proposing a ‘fragment of development capacity’ separated by rural land and arguing it is ‘required’ to meet demand in Hastings. On its face, this conflicts with *Gardon* and the position will need to be carefully considered;
- (c) The Court in *Gardon* placed weight on residential supply needing to achieve a ‘well-functioning urban environment’ and that growth to meet demand needed to be contiguous with the existing urban zoning. Again, this conflicts with the applicant’s position that rezoning PPC7 would have “no impacts on achieving well-functioning urban environments elsewhere in the District” (Further information Response, p12, emphasis added). It is not asserted that the PPC7 area itself would achieve a well-functioning urban environment because it does not form part of an urban area. Again, this conflict between the approach in *Gardon* and that advocated by the applicant will require careful consideration;

- (d) In terms of cl 3.6(1)(c), the Court accepted that small areas of HPL might be justified for rezoning if they met other objectives such as providing defensible boundaries or adding significantly to an existing well-functioning urban environment. While acknowledging the HPL in this case is relatively small, it appears to lack the other features which caused the Court to be satisfied that the loss of HPL was warranted. The Commissioners may also consider whether the approach of rezoning a physically separate area might create more of a ‘widespread issue’ of loss of HPL, compared to the approach of limiting extensions to areas contiguous to urban areas.

**Asher Davidson**