

**SUBMISSION OF GRAEME JOHN DUFF
FOR PLAN CHANGE 48**

**On behalf of
Graeme John Duff & Marion Anne Duff
3 Ekuarangi Place, Oakura**

13th November 2019

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PRIVATE PLAN CHANGE 48 WAIRAU ROAD, OAKURA

Supplementary submission of Graeme John Duff (Submitter 167) in response to further expert evidence of Applicant, Oakura Farm Park Ltd and specifically that further evidence submitted 11th October 2019 by CM Comber and supplemented by further evidence of RA Bain, AL Doy, LE Bunn, A Skerrett.

I have read the further evidence supplied by the experts for OFPL and briefly respond below.

1. I have read the direction from Commission Wasley dated 30th October 2019 and have attempted to avoid repetition of any issues raised in my original submission.
2. My comments will be restricted to the five issues highlighted in the Commissioner's Direction on Further Evidence dated 6th September 2019.
3. Landscape and Visual Effects – The further evidence from Richard Bain does little to change the significant negative landscape and visual impacts that any residential development on the subject land would entail. Despite comments to the contrary the reduction in size does nothing to change the fact that the new proposal is still an intensive residential urban development inappropriate for Oakura.
4. Much evidence from the original Hearing highlighted the negative impact on the adjacent Paddocks rural subdivision. The reduction in the proposed section numbers does not enable the reduced scheme to be “tucked in”, and not seen from The Paddocks. The QEII land will not shield 144 residences but do nothing other than create an inappropriate intensive residential subdivision. Quite inappropriate for Oakura and its existing environment.
5. Because the change has reduced the number of sections to 144 does not stop a “climb further up the Kaitake slope”. While the new proposal is a significant reduction by section number the fact that the bund adjacent to State Highway 45 has been done away with negates any effort to move the subdivision further away from the Kaitake Ranges and National Park. The subdivision boundary has been moved 80 metres away from the edge of State Highway 45 and effectively moves the location of the proposed subdivision very close to the original proposal. I refer to Structure Plan SP01 which will illustrate the point.

6. Paragraph 11 of Mr Bain's further evidence illustrates how the applicant and his advisors do not understand the community opposition. In paragraph 11 Mr Bain states that if an unrelated third party develops their FUD west of State Highway 45 then the communities desire for the majority of future development to be on the western side of State Highway 45 will be satisfied. The applicant has no say or influence on whether this development will ever take place and therefore can't be relied upon to answer the community's desire.
7. I draw attention to Kaitake Vista (Montage) – Sheet FP03. The provision of this montage to try and show what the proposed new development would look like is significantly misleading. I ask that in viewing this, and placing any reliance on it, that one imagines 144 houses and roofs, and the impact that would have on the spectacular views to the Kaitake Ranges from State Highway 45 and many other parts of the existing Oakura township.
8. Turning to the further evidence of Mr Skerrett. That further evidence is predominated by technical information beyond the ability of most laypeople to understand. I put myself in that category but simply make the observation that a further 1,224 vehicle trips per day on upper Wairau Road will have significant detrimental effect to traffic movement between New Plymouth and Okato. There is nothing scientific about this statement but I live in upper Wairau Road and use upper Wairau Road, lower Wairau Road, State Highway 45 and the Oakura township road on numerous occasions daily, and the present roading and footpath setups will not handle the proposals.
9. The evidence of Mr Bunn also dated 11th October 2019 is a cursory summary of his views including and focusing on stormwater management. As I supplied in my original submission the whole area down from the National Park boundary is prone to surface water excesses and as was proven by the unsuccessful stormwater management in The Paddocks subdivision, it appears that appropriate stormwater management is not capable of being satisfactorily designed and implemented.
10. Turning finally to the further evidence of Mr Comber. There are many statements and assumptions contained within Mr Comber's 28-page submission which should be challenged and the logic applied questioned.
11. In paragraphs put forward arguments that because the proposed development would be staged with an average lot size of 29 that it is no different to the historic subdivisions exemplified in paragraph 22. This proposed development is significantly different. It is for 144 sections, not 29 (even if there are some timing constraints proposed).

12. Linked to the rightful community concerns regarding social impact the applicant in paragraphs 58, 59 and 60 propose the establishment of a liaison group to monitor possible social impact. This liaison group will be ineffective with no statutory rights and no rights to instruct the applicant and a liaison group would be ineffective and inappropriate.

13. In paragraphs 45 to circa 51 Mr Comber builds a picture of indecision and uncertainty by the community and quoting on numerous occasions historic planning documents and particularly the KCB 30-year vision document. He then carries forward apparent conflict to introduce a suggestion of apparent community disagreement. Let it be clear that the 470 submissions received overwhelmingly expressed the aspirations and views of the community and this Hearing is not the place to suggest uncertainty. Paragraph 48 should be read and re-read because it suggests strongly of community uncertainty which does not exist. The views of the community have been widely expressed at this Hearing and should be relied upon and recognized.

14. Mr Comber again attempts in paragraph 89 to tell the community what they want and I quote –

“Growing the population at Oakura in line with the community’s well documented aspirations.....”

I reemphasize the point that the community’s aspirations on this plan change application were clearly laid out in the 470 submissions and no amount of contrary statements or suggestions from the applicant can change this.

15. The changes proposed do nothing to relieve the inexcusable damage to the landscape or the vista of the Kaitake Ranges. It does nothing to address the damage to the outlook from The Paddocks subdivision. It doesn’t address the social and cultural risks other than to argue that they don’t need to be addressed. The application remains totally inappropriate for Oakura and should be declined.

Graeme J Duff