

Marc Danzer and Adele Bentley
14 Milford Downs, Masterton
Marc 027 226 0960
Adele 021 87 87 96
Adele.bentley@me.com

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Planning Department
Masterton District Council
P O Box 444
Masterton

planningadmin@mstn.govt.nz

Dear Sir or Madam

Submission on a Notified RC Application	RM240079
Name of Applicant	G Beatson
Address of Proposal	9 Milford Downs, Masterton

We, Marc Danzer and Adele Bentley, would like to make a submission on the above Application by way of this letter (replaces MDC Form 13).

The specific parts of the Proposal that this Submission relate to are as follows (*noting where the Applicant refers to Milton Downs we are assuming they are referring to Milford Downs*):

1. Proposal Summary - Activity Status (page 4)

The applicant states that the application, under both the Operative and Proposed Plans, is Non-Complying Activity. Given this, we would assume that any application should be automatically declined?

2. Site Description (page 5)

"The property (legally described as Lot 5 DP 68587) belongs to the Applicant (in the process of purchasing)..."

Vicki and Bruce Matthews (current owners) have advised us they are selling .5 hectare (more or less) to G Beatson, however this Application states that G Beatson is purchasing the entire 1 hectare (more or less) property. Clarity on this would be appreciated.

"... with the remainder of the site in lawn"

- At least half of the 1 hectare is a paddock with rural fencing and has been up to most recently used to graze sheep. Please see Image 2 (Google screen shots August 2024) at the back of this submission.
- There is no mention of grazing paddocks at all in the Site Description.

4. The Proposal (page 7)

"The dwelling, which will be 10.7m from the new internal boundary – will be compliant with Proposed Plan standards, but not compliant with Operative Plan standards"

Does the dwelling include the raised deck attached to the back of the house? This may mean that the proposal is non-compliant for both Operative and Proposed Plans.

"Proposed Lot 2 would be vacant south lot"

Should this be north or north-west? Are we considering the correct land in this Application?

5.2 Limited Notification

"Under the Operative Plan, the subdivision is a Non-complying Activity, but actual physical effects are expected to be no more than minor ..."

This statement by the Applicant is subjective. Can they provide evidence to support this statement?

6. Assessment of Environmental Effects

- a. *"The application is considered to create less than minor effects on any person".*
- b. *"Under the Operative Plan, the subdivision is a Non-complying Activity, but actual physical effects are expected to be no more than minor."*
- c. *"The proposed activity is considered appropriate and consistent in relation to the existing land use patterns of the area"*
- d. *"The dwelling will comply with the setback standards of the Proposed Plan and departure from the Operative Plan setback standards towards the new internal boundary will have less than minor internal effect only".*
- e. *"The application site is located within the rural environment and as such the scope of the application is considered to be acceptable and consistent with the surrounding rural residential land use patterns including character and amenity values."*

All of the above statements by the Applicant are subjective. Can they please provide evidence and more definitive information to support these statements?

For sections 7.1-8 where the Applicant frequently refers to:

- a. *The property or adjacent properties having no primary production component and is not used for primary production.*

Primary production can include a family or community garden. We teach this in our schools - the Ministry of Education NCEA Achievement Standard Science Learning Area Level 6 (2007) defines primary production as *"a primary production system is a sum of all components, including the growing environment and management practices, that work together in the product of a primary product. Examples of a primary production system include: an orchard, an aquaculture farm, a family or community garden, a dairy farm."*

<https://ncea.education.govt.nz/science/agricultural-and-horticultural-science/1/1?view=standard>

The current owners (Vicki and Bruce Matthews) have raised sheep on this property for several years. Several adjacent/near properties do the same (at least seven properties in the community of Milford Downs grow their own meat, and many more their own fruit and vegetables).

This land and the surrounding area are currently defined as LUC 3 in the National Land Policy (NLP) for Highly Productive Land (HPL), sub-division is highly discouraged and is supported by *Policy 4: The use of HPL for land-based primary production is prioritized and supported.*

Milford Down's soil is fertile, productive and has a generous dense and healthy green cover (please refer Image 3). As a further example, our own fruit trees have proven prolific producers.

Therefore this proposed sub-division *will* result in a loss of primary productive land.

- b. *The proposal will have no adverse effects on production use of adjacent sites, negligible effects on the aesthetic and open space values of this semi-rural environment and is more urban than rural.*

These statements by the Applicant are subjective. Can they provide evidence to support these statements?

As the current owners have used the Proposed Lot 2 as grazing land for several years within an open space and in a semi-rural environment this proposal will have adverse effects on the aesthetics and open space values of this semi-rural environment (please see Images 1, 2 and 4).

We believe the existing character is more rural than urban – hence why we and other residents purchased our properties in Milford Downs.

We are unsure what the Applicant means by *"... and based on the Council's attitude towards subdivision lodged recently in the same zone"*. Can the Applicant please provide further reference to this statement? We are aware of only one other application for sub-division in Milford Downs and that is awaiting mediation. Have the Council given their support towards this other application?

- c. *“The surrounds of the new dwelling on the proposed Lot 2 are most likely to be landscaped for shelter and privacy, further reducing effects on the immediate area.”*

This statement by the Applicant is vague – “most likely”. What say it isn’t?

- d. *“A new access will be created to Milford Downs ... the new access will not compromise the safe and efficient use of the road network”.*

This statement is subjective and we disagree. The property is on a protruding corner (like a peninsular) and once the proposed shelter hedging, etc., is in place, may well reduce visual clearance for oncoming traffic or people exiting the property (please see Image 5).

- e. *“The proposed plan is ... in general accordance”.*

This statement by the Applicant creates an unwarranted sense of security that compliance will be met.

- f. *“The proposed activity will have no adverse effects on the environment which is any more than minor”.*

This statement by the Applicant is subjective. Can they provide evidence to support this statement?

Repeating that lawns and landscaping will be added only continue to contradict healthy environmental practices. Statistics NZ report that for period 2002-2019, the use of land for primary production purposes (specifically agricultural land uses, such as beef and sheep farming and dairying, horticultural land uses, such as fruit and berry, and vegetable growing, and other land uses, such as forestry) reduced by 208,000 hectares (more than 2%).

Meanwhile, globally, in April 2024 the international Food Security Information Network (FSIN) warned that 281.6 million people across 59 countries are currently experiencing acute hunger – 24 million people more than the previous year.

This might seem very far-removed from this Application however, giving much greater consideration to the bigger picture, reducing any land that is suitable for agriculture or horticulture use is simply burying our heads in the sand to addressing global issues. This proposal simply adds to the problem.

- g. *“No party has been identified as potentially adversely affected by the proposal”.*

This statement by the Applicant is subjective. We disagree with this statement. The issues we have addressed throughout this submission detail how we believe we, and others, will be adversely affected.

Submission Summary

1. Milford Downs is a unique and very desirable place to live in because of:

- the size and use of the blocks of land
- the significant mature, dense and healthy green cover that is enjoyed across the entire suburb and feeling of being ‘enveloped’ in nature
- privacy from neighbours (and roading)
- peacefulness, and
- location to town and amenities.

Thirty years ago the original developer also did some smart stuff like ensuring residents either had the much-valued view of the Tararuas or, if they didn’t, a pleasant outlook of a lake, pond, or waterway going through their property.

We, like so many of Milford Down’s other residents, purchased our property because of these very reasons. We believe that sub-dividing anywhere within Milford Downs will both greatly devalue the intentions of the original developer and the community as a whole.

2. While the Applicant states that care is being taken to ensure that the ‘rural’ character is not affected by this proposed subdivision much further care and consideration needs to be given to the perspective from the wider community.

3. We fully support Council's approach to integrated housing options within any urban/semi-rural area, especially with respect to addressing the 'national housing crisis'. But this proposal doesn't do this in a number ways and it doesn't add value to a well-designed, well-established unique community. If it's a .5 hectare property the purchasers are after, then there are fit-for-purpose .5 hectare properties already in the region. Carving up Milford Downs when it already feels 'completed' just doesn't make sense.
4. Just because authorities give us the tools to sub-divide doesn't mean we should if we pause and look at the bigger picture, considering the impact on others' properties, communities and that of future generations.

This application is for non-complying activity under both the Operative and Proposed Plans.

Given all of the above, we ask the Council to Decline the Consent.

Yours sincerely

The image shows two handwritten signatures side-by-side. The signature on the left is a stylized, elongated mark that appears to be 'D'. The signature on the right is a more complex, cursive signature that appears to be 'Bentley'.

Marc Danzer and Adele Bentley

Image 4



Image 5

