

SUBMISSION 115

JName (Please use your full name)

Jenny Douché

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Agent acting for submitter (If applicable)

N/A - self submitted

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I could gain an advantage in trade competition through this submission

No

The specific provisions of the proposed Plan Change that my submission relates to are as follows

Berketts Farm Precinct

My submission is that

See attached doc

I seek the following decision from the local authority

See attached doc

Please indicate whether you wish to be heard in support of your submission (tick appropriate box)

I do wish to be heard in support of my submission.

please indicate whether you wish to make a joint case at the hearing if others make a similar submission (tick appropriate box)

I do not wish to make a joint case.

If your submission is over 500 words, please upload a word document with your submission. Please provide the questions as your headers before each paragraph.

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

1. It is frivolous or vexatious
2. It discloses no reasonable or relevant case
3. It would be an abuse of the hearing process to allow the submission (or the part) to be taken further
4. It contains offensive language
5. It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

This submission does not meet any of the above criteria

Plan Change 50 submission - Berketts Farm

1. Name: Jenny Douché
2. Postal address: 79 Heke St, Ngaio, Wellington 6035 (address of our property is 751 Whitemans Valley Road)
3. Acting agent for submitter (if applicable): N/A - self submitted
4. Address for service (if different from above): 751 Whitemans Valley Road (postal address is 79 Heke Street, Ngaio, Wellington, 6035)
5. Telephone number: 021 126 5555
6. Email address: jenny@screwtop.org
7. I could gain an advantage in trade competition through this submission: No
8. The specific provisions of the proposed Plan Change that my submission relates to are as follows: Berketts Farm Precinct
9. My submission is that (free text to add your views): see below
10. I seek the following decision from the local authority: see below
11. Please indicate whether you wish to be heard in support of your submission: I do wish to be heard in support of my submission
12. Please indicate whether you wish to make a joint case at the hearing if others make a similar submission (tick appropriate box)* I do NOT wish to make a joint case.

My submission is that ...

The Southern Hills have 100% vegetation, it's not farmland

Developing the Southern Hills area contradicts the intention to improve vegetation coverage.

In the *S32 Evaluations Report, Berketts Farm Precinct* section (p5), it says "key characteristics of the Precinct is[sic] the retirement of the site from farming, protection of existing indigenous vegetation and the establishment of further planting" (p5).

The goal of retiring farmland is valid for most of Berketts Farm, namely parts of the Ridgeline, Lower Ridgeline, Valley, Valley Flats and some parts of the Northern Spur. These areas contain large areas of pasture. None of the Southern Hills area is currently farmed, it has 100% vegetation coverage, mainly bush and pines. However it's been earmarked for the most intensive development of the whole precinct.

If 36 lots were developed, and allowed a minimum of only 10% native vegetation coverage, this would significantly reduce the overall vegetation on the Southern Hills.

Therefore the Southern Hills area should be treated separately from the rest of the Berketts Farm development, with much greater restrictions on vegetation removal, and increased minimum plot sizes so that less of the vegetation needs to be removed.

The gradient of the Southern Hills is hazardous

Aside from vegetation removal, other adverse impacts of development were listed which also affect vegetation “Additional erosion and runoff from bulk earthworks” and “Potentially increased land instability through development” *S32 Evaluations Report, Berketts Farm Precinct* section (p12).

The land on the Southern Hills is mostly very steep, and so removing the vegetation (pines included) will cause significant amounts of water run-off. We need to look at what happened in Hawkes Bay to see the potential impact that severe weather events have to the valleys below.

The bush on the Southern Hills was identified as an SNA

Much of the Southern Hills is earmarked as Significant Natural Areas (SNAs). Even though SNAs have not yet been officially confirmed, every effort should be made to protect these identified areas.

S32 Evaluations Report, Berketts Farm Precinct section (p5) states that “The Berketts Farm Precinct has an area of indigenous vegetation that meets the criteria to be classified as a significant natural area. SUB-RUR-O5 will ensure this is protected and enhanced, and therefore achieves s6(c) of the RMA.”

Table 1 Shows large areas (light green) of the Southern Hills that were tagged as [significant natural areas](#)



We're protecting native bush, UHCC should too

A huge motivation for purchasing our property at 751 WVR in 2020 was to help do our bit to protect the environment. Over 90% of our 43ha lot is covered in regenerating native bush. It's one of the few such blocks in Whitemans Valley. By owning the land we could ensure that the bush was fully protected.

The plan to clear substantial amounts of land and then allow each of the 100+ allotments to have a minimum of only 10% of indigenous vegetation totally goes against our values. We hope that the council also values bush over pasture and lawns.

Buildings should not be visible from Whitemans Valley Road

Confirmation is needed that no buildings will be visible from Whitemans Valley Road.

The map in the *Plan Change 50 - Rural Review* (p134) indicates that large areas of bush (not just pines) will be developed on the Southern Hills, including land facing south-west which is easily visible from Whitemans Valley Road.

Development of these south-west-facing areas therefore goes against the statement (p134) that "All buildings in the precinct will be located and designed to not be visible from Whitemans Valley Road".

We agree with the council that it's really important to protect the aesthetics of the area. The drive through Whitemans Valley is stunning, and it is something that the council should be proud to showcase to visitors. Adding additional visible houses on small blocks will no doubt negatively impact this visual aesthetic.

Traffic and road safety will be impacted

Plan Change 50 - Rural Review (p30) states that traffic generation for any site should not exceed 100 vehicles per day in rural lifestyle, rural production and rural general zones. The proposed development will mean traffic increases far beyond this maximum. I understand that the council previously acknowledged that Blue Mountains Road was at traffic capacity.

I frequently see people pushing buggies, horses and runners along Whitemans Valley Road. People enjoy getting out and about in a way that's healthy and enjoyable. If the numbers of cars increase as predicted, many of these activities will likely cease, forcing even more people into their cars.

Every new residence in the Precinct will be reliant on their cars, and the trips will be long, which is not environmentally sustainable. Whitemans Valley is generally only accessible by car, and it's about a 20km round trip to the nearest public transport and other amenities. If the aim is to create additional housing stock, then locating these houses closer to amenities should be the focus.

S32 Evaluations Report, Berketts Farm Precinct section (p12) lists transport and infrastructure-related costs as:

- Continued reliance on private vehicles by enabling a development of this scale in the rural environment.
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- Potential for reverse sensitivity effects
- Significant changes in character.
- Significant changes in amenity.

It also notes that “No direct opportunities for economic growth have been identified”.

Housing affordability is not being well addressed

I understand the desire to create more affordable housing, however lifestyle blocks in this location are not generally classified as affordable. I realise that people moving to the area will need to sell their properties, freeing up housing stock, but I think this freed-up stock is unlikely to be affordable either.

Increasing housing stock should not be done at the expense of removing large areas of bush for a relatively small number of houses with oversized lawns.

The focus should instead be on allowing housing stock that is affordable in itself, and in locations where there are no substantial areas of bush to clear.

The economic benefits of the development are stated in *S32 Evaluations Report, Berketts Farm Precinct* section as “Enables a higher level of development than the underlying zones and therefore a higher return from development.” and “Increased economic return when compared with farming” are only from the perspective of the developer, which should not be a concern of the council. The council should be concerned with economic benefit to many, as opposed to just one entity.

Consultation and documentation is inadequate

Prior community consultation was not adequately undertaken.

I expect there will be other submissions to this effect from people who have been through similar processes before, who therefore have an understanding of what normal consultations look like.

I don't have experience, however I only found out only by chance from a neighbour two weeks ago that 350ha directly opposite us were being considered for an extensive development. From what I can see, it appears that the Berketts Farm precinct was included in counsel documents very late, and no effort was made to notify people.

This does not seem to be a fair process.

I seek the following decision from the local authority ...

My preference is for this development not to proceed, but I recognise that it could.

Therefore I am seeking the following relief in the following ways.

- **The Southern Hills should not be lifestyle zoned**, it should have much larger minimum plot sizes.
- Only pines should be able to be removed, and **all existing bush should be protected** as per the intent of the SNA.
- Most areas, especially the Southern Hills area, are very steep, and so the potential for problems caused by water run-off is high. **Here the minimum amount of vegetation required on plots needs to be far greater than 10%**, recommend at least 50%. The environment must be a key factor.
- The **visual aesthetics along Whitemans Valley Road need full protection**. It is stated that earthworks and buildings must not be visible, and this should be strictly adhered to.
- **Proper consultation with the community is undertaken.**