

Upper Hutt City Council PC50 submission

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Declarations

- I do not stand to gain commercial advantage from my submission
- I wish to be heard in support of my submission
- I do not wish to be included in a joint submission of similar submissions

Summary

My submission relates to the lack of consultation and inadequate communication about the proposed Berketts Farm Precinct in PC50, and the lack of relevant detail in the proposal, as well as the lack of environmental consideration for the Southern Hills parcel of the precinct.

Lack of consultation and transparency

Note: My concern over lack of consultation and information relates to late addition of the Berketts Farm Precinct, not to PC50 overall. I recognise that the draft PC50 process sought feedback and provided a lot of background information.

Inadequate notification of Berketts Farm Precinct

In early October we received a letter about PC50 and changes to the district plan that also invited submissions on the subject. After following links and browsing the UHCC website, I inspected maps of zoning changes in Whitemans Valley, and read through the PC50 changes to the zones affecting our property and what effect those provision changes would have on our property and future plans. I didn't feel that the changes affected us a great deal, and declined to make a submission.

Less than two weeks before the extended deadline for submissions closed, I found out from neighbours that there was a large subdivision of up to 100 allotments included in PC50 planned across the road from us - the Berketts Farm Precinct. This was very surprising as my earlier research into PC50 had not given me any indication at all that something like this was planned.

Inadequate information discoverability on UHCC website

There are several different and redundant landing pages relating to PC50 on the UHCC website, and not all are up to date with the latest copies of documents. For example, the out of date "*Plan Change 50 – Rural and Residential Chapters Review*", with no mention of Berketts Farm is more prominent from the main District Plan page than the shorter but newer "*Plan Change 50 Rural Review*" which is at the bottom of the District Plan page.

The Section 32 report on the "*Plan Change 50 Rural Review*" page is **not** the combined version that includes the Berketts Farm Precinct information. That version only seems to be available on the letskorero page, which is easy to miss if you are just researching and not planning on providing feedback yet.

The PC50 FAQ document still links to the superseded "*Plan Change 50 – Rural and Residential Chapters Review*" page which does not reference Berketts Farm Precinct anywhere.

It is also very easy to miss instructions to turn off various zoning map layers that mask the new Precincts on the interactive maps. This also impedes discovering District Plan changes that affect you, even when you do go looking for them. I was caught by this both when initially looking for PC50 zone changes after receiving the public notification letter, and later after hearing about Berketts Farm and first going looking for information about it.

These examples are forming a pattern of increased difficulty in sorting out the newest and most relevant information from older draft information.

Inadequate timing regarding inclusion of Berketts Farm into PC50

Berketts Farm appears to be a late addition to a wide ranging PC50 that happened after the bulk of the PC50 evaluations, planning and feedback stages were over. This appears to be a much accelerated time frame compared to recent comparable Private Plan Changes.

Unlike the Gabites Block, Staglands and Shooting Club Precincts that were included in much of PC50's draft planning, consultation and community feedback phases going back years, Berketts Farm does not seem to have been visible until its 30 Aug 2023 Section 32 report and related PC50 provision changes were included in the 20 Sept 2023 council meeting agenda for approving the PC50 public notification. There was no record of Berketts Farm Precinct being presented or discussed in any meeting minutes though. This final round of feedback PC50 seems to have been the only chance to learn about or comment on the Berketts Farm Precinct at all.

Inadequate information provided regarding the Berketts Farm Precinct

Even when you can find any information at all, there is very little documentation available about the Berketts Farm Precinct in either PC50 provisions document or the combined Section 32 report. This seems in stark contrast to the many detailed plans and technical reports that went into Private Plan Change 55 for Gabites Block or the smaller Private Plan Change 51 for Riverside Farm.

This is notable considering that Berketts Farm is for the most part in a more sensitive position regarding roading infrastructure, remoteness, access to public transport, existing indigenous vegetation, and steeper hillsides than Gabites Block or Riverside Farm.

The extensive PC50 policy planning, background information and reporting, as well as summaries of community feedback include no mention of Berketts Farm due to them predating its last minute inclusion. In fact many of those background reports highlight that

the middle section of Whitemans Valley is sensitive to further development and requires careful consideration.

Inaccurate information in Section 32 report for Berketts Farm Precinct

Section 1.3 Table 1 substantially understates many effects of the proposal - lots of low ratings for convenience or wishful thinking without any justification. It appears intentionally underrated to avoid proper evaluation. As stated: *"The level of detail in this evaluation report is appropriate for the level of effects anticipated"*.

- Rating *"Who and how many will be affected, geographic scale of effects"* as 1 (lowest) ignores the substantial traffic increase all the way along the tight and narrow sections of Whitemans Valley Rd and Blue Mountains Rd, affecting everyone in Whitemans Valley and Blue Mountains. There appears to be no evaluation of effects on other shared infrastructure capacity e.g. power, telecoms etc.
- Rating *"Degree of impact on or interest from Māori"* as 1 (lowest).
 - It is odd that *"Will result in retirement from farming and significant revegetation"* is included in this section, but this is completely untrue for the largest Southern Hills parcel which is already entirely covered in established vegetation and has no existing farmland to retire. This plan would end up removing large tracts of that vegetation.
- Rating *"Type of effect"* as 1 (lowest).
 - *"Improved water quality and biodiversity through revegetation"* ignores that especially in the largest Southern Hills parcel, the proposal will be clearing forest including large areas of indigenous vegetation.
- Completely unsure how *"Degree of risk or uncertainty"* could be rated as 1 (lowest) considering much of the draft PC50 planning material rated the central section of Whitemans Valley as particularly sensitive to development effects.

Section 3.1 Assessment of Proposed Objectives: *"Berketts Farm Precinct is a high quality rural residential development that integrates with the natural environment and enhances indigenous biodiversity."* There are no plans or evidence provided that this will be the case, and it also ignores that developing the Southern Hills and other pockets will be degrading the natural environment and indigenous biodiversity already in place.

Section 3.2 continues to repeat the same inaccurate statements that depict the existing land as farmland to be retired and revegetated. The reality is that only a small portion of the precinct is existing farmland, and that developing it will be destroying indigenous vegetation - especially in the Southern Hills parcel.

Sections 3.3 and 3.4 continue to falsely depict the proposal as retiring farmland instead of developing on top of existing forest and indigenous vegetation.

Section 4 reads as though Option 4 for the Bespoke Precinct was a foregone conclusion because it was the easiest most efficient way for the council to push this through for the *"consultants promoting the development"* without having to justify their inaccurate depictions or subject it to the kinds of evaluation other Private Plan Changes have. This appears unfair to both the public who get very little consultation and transparency in the decision, as well as

to other plan change applicants who had to follow the rules and do things *by the book* for their zoning changes.

The report claims that the council "*Sought feedback from the community on a draft PC50 "in order to identify other reasonably practicable options"*". This sounds true because the draft PC50 process did seek feedback, but is a misleading and irrelevant distraction - all the earlier community feedback regarding the draft PC50 predated the publication of any information about the Berketts Farm Precinct.

There is no reasoning for why this specific precinct of rezoned Rural Lifestyle Zone is different enough not to follow the standard Rural Lifestyle Zone rules. The question of why this particular site needs to be a special case is not answered.

Section 5 reads as though it was pushed through the process with as little scrutiny as possible as the "*most appropriate way to achieve the proposal*". That definitely reads like a foregone conclusion not up for debate or independent evaluation.

Environmental effects

The lack of any actual impact assessments to comment on is unfortunate, and the lack of actual development plans makes commenting difficult. It is clear that what little has been published about the environmental effects of the Berketts Farm Precinct is not complete, accurate or balanced.

Indigenous vegetation

The Southern Hills parcel is the largest parcel of the precinct with 36 properties planned. Unlike the Section 32 report claims, this parcel is not farmland to be retired but tracts of pine trees surrounded by regions of native bush. Developing this parcel would mean widespread clearing of established vegetation for roads, driveways, building platforms and lifestyle areas. This would have a detrimental and opposite effect on biodiversity and water quality contradicting the claims in the proposal.

Roughly a third of this parcel is the same valuable native bush that is being set aside in a surrounding parcel and was previously earmarked as a Significant Natural Area.

This seems at odds compared to the descriptions in the Section 32 report.

Hillslope, earthworks and runoff

The Southern Hills parcel is all hillside, and most of the block is marked as high slope risk. This means that development of roads, driveways and building platforms would require more extensive earthworks than developing on flat areas. This combined with the loss of vegetation increases the risks of erosion, runoff, and sedimentation. This is also not addressed by the information available.

The available information is completely inadequate compared to that produced for other recent Private Plan Change developments

Traffic and roading infrastructure

Adding 100+ properties to the constrained middle section of Whitemans Valley Rd between Russells Rd and Katherine Mansfield Drive increases the number of properties along that section of road by roughly 2.5x. This is a constrained section of road that is already effectively one lane in many places and has several blind corners. The existing road is already inadequate for safely sharing with more cars, horses and cyclists. As most commuters work outside Upper Hutt, a lot of this new traffic will be via the narrow twisty Blue Mountains Rd to get to either SH2 or the Silverstream railway station.

The middle section of Whitemans Valley Rd is one of the more remote parts of the Upper Hutt roading network and has no public transport available. This was mentioned in multiple places in various PC50 background documents.

No attempt was made to address the effects of traffic on this particularly remote and vulnerable section of the road network. This is also in contrast to the level of traffic analysis that went into comparable developments that are nearby to public transport. To use guidance from the *PC50 Assessment of Transport-related Provisions* report indicating that a residential property would on average generate much more than 1 vehicle movement per day, then 100 new properties goes beyond the threshold for an Integrated Traffic Assessment, and is higher than the PC50 TP-S9 limit.

PC50 TP-S10 also limits the number of allotments accessed by a private road to 6. There are no details in the Berketts Farm proposal to indicate new public roads or conversion of existing private roads to public roads.

Other infrastructure

Another aspect not addressed is how the existing power or telecommunications infrastructure would cope with a large increase in demand.

The Operative District Plan also highlighted problems for future development in the Blue Mountains area regarding inadequate septic tank soakage - it appears that Berketts Farm is a similar aspect on a similar hill.

Relief sought

The primary result I am seeking from this submission would be that the Berketts Farm Precinct is removed from PC50 so that it can go through the standard Private Plan Change process the same way comparable development proposals have had to. That way the precinct can be properly evaluated once the proposals scope and its environmental effects are better known. The Berketts Farm Precinct does give the appearance of a last minute addition to slip under the radar without any evaluation.

I would like the Berketts Farm Plan Change to be evaluated fully by independent commissioners to ensure it is handled transparently and properly.

Additionally once Berketts Farm is a separate Private Plan Change, I would like to see the Southern Hills parcel added to the protected native bush parcel. This would minimise the damage to existing vegetation and biodiversity, as well as adverse effects due to earthworks on its steep slopes, increased runoff, and the extra traffic being added to an already inadequate section of Whitemans Valley Rd.