

# SUBMISSION 79

## Name (Please use your full name)

Lisa and Andrew Plimmer

## Postal Address

115 Russells Road, RD1 Upper Hutt 5371

## Agent acting for submitter (If applicable)

This submission is on behalf of both myself (Lisa) and my husband (Andrew)

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## I could gain an advantage in trade competition through this submission

No

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## My submission is that

Overall position: We acknowledge that New Zealand is in the grip of a housing crisis due to housing supply not meeting demand. We also acknowledge that different types of housing at different price points are needed. We do not oppose adjusting the zone settings within the Rural Zone to enable more housing. Being able to live rurally but still close to urban areas is a very attractive lifestyle choice which should be made available to more people. But, decisions about how many houses are built and where must be carefully considered; and all risks and issues appropriately mitigated. Also, genuine consultation with rural communities must occur (not just appear to occur). Too often, consultation with communities is seen as an obstacle or threat to be overcome. Rural communities have invested a lot into their communities (and not just in financial terms) and are rightfully protective of it. We have a right to receive honest and comprehensive information about changes being proposed. We also have a right to expect that our voice will be given at least the same weight as any other key stakeholder. So, while we do support aspects of the proposed provisions, there have been significant deficiencies in the consultation process and information made available:

- The Council has not acted in accordance with some of the principles of consultation set out by the Environment Court: The scale and nature of changes between the provisions that were publicly consulted on in 2021 and the proposed provisions released in 2023 are so significant that no reasonable person could say that the nature and object of the 2021 consultation relates to the circumstances presented in 2023; The community has not been given a reasonable opportunity to state their views on the Berketts' Farm Precinct. This Precinct was not included in the 2021 consultation. The first time that the community was made aware of this proposed development was when the 2023 Proposed Provisions document was released in October 2023; The way that the Berketts' Farm Precinct is presented suggests that this development is a 'done deal' therefore the Council does not appear to be approaching the consultation with an open mind; and The information provided in the proposed changes are not enough for those being consulted to know what is being proposed.
- The quality and comprehensiveness of the information provided on Berketts' Farm Precinct is seriously deficient. 125 words across two documents and a vague map with no identifying landmarks is not good enough. Smaller development proposals within rural Upper Hutt have come under far more scrutiny than the Council appears to require from the developers of Berketts' Farm Precinct. We have provided more detailed comments in the following pages. Request for change/Relief being sought: Put the review on hold until the community have been genuinely consulted and appropriate assessment of the impact of the proposed Berketts' Farm Precinct has been undertaken and published. Thank you for the opportunity to voice our concerns and for your careful consideration.

Lisa and Andrew Plimmer

1. Adequacy of consultation The Environment Court, which is the primary judicial decision-making body under the Resource Management Act, has developed a statement of principles to guide councils when consulting on proposals or other matters. These principles are centred on fairness and transparency. While Council appears to be acting in accordance with some of these principles, there are four on which Council has fallen short:

1.1. The nature and object of consultation must be related to the circumstances. Paragraph 20 of the Introductory Section 32 Report states that 'Genuine engagement with the community has been a guiding principle for the development of PC50.' It goes on to say: 'A key milestone for PC50 was the release of a draft set of provisions for the community to provide feedback on, and this occurred in July 2021.' While the essence of some of the provisions contained within the 2021 draft have been reflected in the 2023 Proposed Provisions document, the details bear very little resemblance. Therefore, the Council cannot claim that there has been genuine engagement when the current proposed provisions are so very different to those that were consulted on. No reasonable person would say that the nature and object of the 2021 consultation was related to the proposed provisions presented in 2023.

- Requested change/relief: put the review on hold until the public have been genuinely consulted on the new proposed provisions.

1.2. Those consulted must be given a reasonable opportunity to state their views. References to the Berketts Farm Precinct within both the 2023 Proposed Provisions document and the Section 32 Evaluation Report suggest this development is a 'done deal'. The community has not been consulted on this development. The first time many people heard of the proposed development was when the proposed provisions document was released in October 2023. In 2019, Perception Planning Limited prepared a report for the Upper Hutt City Council called Rural Land Use Assessment for Upper Hutt. In this report, Perception Planning Limited undertook a SWOT analysis. One of the threats noted (on page 6) was: "Parts of the rural community have previously been resistant to strategic development, like the Maymorn Structure Plan. The local community will need to be part of the development of any future proposals of this nature." You were advised that the local community should be included during the development of any future proposals but appear to have ignored this regarding Berketts Farm Precinct and the provision changes being proposed to enable this development. Also, paragraph 21 of the Introductory Section 32 Report notes that "PC50 which has been notified under Schedule 1 of the RMA has been significantly influenced by the feedback provided by the community, landowners, key stakeholders, iwi and detailed workshops with elected members". Who are these 'key stakeholders'? Given the scale and nature of the changes between the 2021 and 2023 provisions, it appears that these 'key stakeholders' have had a disproportionately larger influence on the Council's processes than the community (the ratepayers).

The community has the right to know who these 'key stakeholders' are.

- Requested change/relief: put the review on hold until the community have been genuinely consulted on the proposed Berketts Farm Precinct. And specify clearly within the documentation who the 'key stakeholders' are.

1.3. The parties are to approach consultation with an open mind. As noted above, the proposed Berketts Farm Precinct appears to be a 'done deal'.

- Requested change/relief: put the review on hold until the public have been genuinely consulted on the proposed Berketts Farm Precinct.

1.4. Adequate information of the proposals is to be given in a timely manner so that those consulted know what is proposed. Many people have expressed frustration that they are struggling to understand what is being proposed. We have personally found the proposed provisions document very difficult to read due to the tracked changes. We understand that the tracked changes are intended to enhance transparency but, without access to a 'clean version', the proposed provisions are made opaquer due to reduced readability.

- Requested change/relief: put the review on hold and make a clean version available for the public to read. The information regarding the Berketts Farm Precinct is not sufficient to enable the community to understand what is being proposed. Between the Proposed Provisions document and the Section 32 Evaluation Report, there are 125 words describing the proposed Precinct area plus a map with questionable scaling and no identifying landmarks. Surely a development that is 353 hectares in size deserves more analysis and assessment.

- Requested change/relief: put the review on hold while more detailed information, analysis, and assessment is either undertaken or released so that the community is properly informed about the proposed development.

2. Quality and comprehensiveness of information provided on Berketts' Farm Precinct is inadequate.

2.1. Conflicting information across the 2023 Proposed Provisions document The 2023 Proposed Provisions document contains conflicting information relating to the number of allotments within the proposed Precinct: - SUB-RUR-57 (on page 52) suggests that there would be 103 allotments. - The paragraph under Appendix 3 (page 133) suggests there would be up to 100 allotments. - The table under the Berketts Farm Precinct Development Areas map (page 134) suggests there are 105. How many are planned?

- Requested change/relief: update the Proposed Provisions document to reflect the correct number of allotments proposed.

2.2. It is unclear in the 2023 Proposed Provisions where this Precinct is. There is a map in the Berketts' Farm Precinct Structure Plan in Appendix 3. We assume the intention of this map is to notify the community as to where the proposed location of the development is and what it might look like. However, there are no road names or identifying landmarks that the community can use to figure out where it could be. On 8 November (just nine days before submissions were due to close) I, and many others in the community, finally found out exactly where the proposed development was planned to go. We attended a community meeting to discuss the plan changes at a property that is right on the boundary of the proposed area. It is not the responsibility of a small number of community members to make the rest of the community aware of the location. You have an obligation to make sure that those you are consulting with have at least a basic understanding of the proposals.

- Requested change/relief: update the Proposed Provisions document to properly identify the location of the proposed development.

2.3. The amount of analysis and assessment provided is not commensurate with the scale of the proposed development. Between the 2023 Proposed Provisions document and the Section 32 Evaluation Report, there are 125 words describing the proposed Precinct area plus one map with questionable scaling and no identifying landmarks. Surely a development that is 353 hectares in size warrants more analysis and assessment. In comparison: - Private Plan Change 55 – Gabites Block refers to the rezoning of 74.5 hectares of land in Maymorn Road, Maymorn, Upper Hutt. That Plan Change included the following: Archaeological Assessment Integrated Transport Assessment Landscape Analysis Geotechnical Assessment Soil Contamination Assessment Soil and Land Use Capacity Assessment. -Private Plan Change 51 – Rezoning of Riverside Farm relates to the rezoning of a 77.8-hectare site in Mangaroa Valley. The Structure Plan for this allotment was 34 pages long (versus 73 words for Berketts Farm Precinct). The Plan Change also included the following: Landscape Assessment Engineering Assessment Traffic Assessment Report Farm Plans

- Requested change/relief: either,

- a) [if these assessments haven't been undertaken yet] put the review on hold until similar assessments and analysis is undertaken on the Berketts Farm Precinct area and released to the community so that they can understand what is being proposed; or

- b) [if these assessments have been undertaken] put the review on hold and publish these assessments so that the community can look at the information and understand what is being proposed.

2.4. The Council is underestimating the scale and significance of the effects of development. On pages 232 and 233 of the Section 32 Evaluation Report, the Council has scored the scale and significance of the Berketts Farm Precinct area at 10 points out of 35 (the lower the score the lower the scale and significance of the effects). The most significant understatement is regarding who and how many will be affected, geographic scale of effects. The evaluation score given to this criterion is 1 (i.e., low). The summary of effects justifying this score is "Localised as it is only restricted to the 353 hectares covered by the Precinct". This low score does not make sense. If the proposed Precinct area were to go ahead it would increase the number of properties within the Valley significantly. We estimate there could be about 300 existing properties in the Valley. An additional 100 properties mean an increase of a third%. This rapid and concentrated growth will most certainly affect the Valley more broadly. Let's stop ignoring the 'elephant in the room': roading. Claiming that the only geographic area that is impacted will be the 353 hectares covered by the Precinct feels like a gross over-simplification. Surely Council is not thinking that the residents in the Precinct will not travel outside the boundaries of the 353 hectares. The residents will have jobs in Upper Hutt, Lower Hutt, or Wellington that they need to get to; they may have children that need to get to school; they will have friends and family that will want to visit etc. This all results in increased traffic on the Valley's roads. One drive right through the valley should be enough to know that adding 100 properties will have more than just a 'low' impact.

2.5 Traffic coming out of Berketts' Farm Precinct will face constraints in both directions: Based on what we have learned about the location of the Berketts' Farm Precinct, the proposed Precinct area lies right between a set of three one-lane bridges and Blue Mountains Road – a steep, narrow, windy road. In both directions, free traffic flow is difficult. A major upgrade of the main distribution roads through and out of the valley is needed before further developments proceed. This is supported by SUB-RUR-13 in the Operative District Plan which states: 'Blue Mountains Road requires major upgrading to accommodate further development, and this may result in significant adverse environmental impacts'. The Operative District Plan goes on to say: 'The present capacity of Blue Mountains Road is a limiting factor in considering development proposals in areas served by it'. This is echoed in paragraph 116 of the Upper Hutt Rural Land Use Assessment Report prepared by Perception Planning Limited in 2019 which states: 'Many of the rural roads in Upper Hutt are narrow, winding and steep, with single lane bridges ... Unless developers are required to contribute to the upgrades of such roads to improve their resilience and capacity, it does not seem appropriate to accommodate further rural residential development in these areas.' The current number of Valley residents struggle with the Road. Not a week goes by without at least one complaint on the Valley Facebook page about a near-miss on that road. I, Andrew, have had first-hand experience of that type of driving when I was injured in a head-on collision in 2021 when a driver coming up the hill came around a corner on the wrong side of the road. Also, the nature of rural living means there will be large vehicles on narrow roads. In summer, tractors and hay bailers are common sights on the Valley roads. With forestry being a key industry in rural Upper Hutt and forests within Whitemans Valley reaching maturity, logging trucks manoeuvring along Whitemans Valley Road and up and down Blue Mountains Road is becoming increasingly common. There have been three log harvests within the last two years (two on Blue Mountains Road and one on Russells Road) plus another two planned for Russells Road – one starting shortly and another in the planning phase. There is no information within the Berketts' Farm Precinct Structure Plan which identifies measures to mitigate the additional strain to that will be placed on already strained roading. • Requested change/relief: a) [if an assessment of the traffic impacts and identification of mitigation measures hasn't been undertaken yet] put the review on hold until a traffic assessment has been done and mitigation measures identified; or b) [if an assessment of traffic impacts and identification of mitigation measures have been undertaken] put the review on hold and publish the traffic assessment and mitigation measures identified so that the community can look at the information and understand what is being proposed. There is no information within the Structure Plan which provides any mitigation to the fact that the roads are already under pressure. 2.6 Access points from the Berketts' Farm Precinct on to Whitemans Valley Road: The proposed standard – TP-S10 – states that the maximum number of allotments

accessed via a right of way or private road must be no more than six. The rationale for this maximum is that it will result in a safer transport network. However, with around 100 properties planned in the Berketts' Farm Precinct, there must be plans to add 16-18 access roads along a 3km stretch of Whitemans Valley Road. How can this possibly result in a safer transport network?

- Requested change/relief: put the review on hold until Council and the developers can provide a mitigation strategy for the additional strain to that will be placed on already strained roading.

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

Put the review on hold until:

- a) proper assessment of the site, and mitigations of the risks and issues associated with the site are undertaken and published; and
- b) there has been genuine consultation with the community

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**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.

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

I do wish to make a joint case.

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**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.**

[https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/64bc79976d8192f9b7c7783586631a32348673e0/original/1699935292/dab6b75081a8bfad9a34a053a112c5fb\\_Plan\\_Change\\_50\\_-\\_Rural\\_Review\\_%28submission%29.docx?1699935292](https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/64bc79976d8192f9b7c7783586631a32348673e0/original/1699935292/dab6b75081a8bfad9a34a053a112c5fb_Plan_Change_50_-_Rural_Review_%28submission%29.docx?1699935292)

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## Plan Change 50 – Rural Review

Submission from Lisa and Andrew Plimmer  
115 Russells Road, Whitemans Valley, Upper Hutt  
[Lisa.andrewnz@hotmail.com](mailto:Lisa.andrewnz@hotmail.com)

### Declarations:

- We do not stand to gain commercial advantage from e submission.
- We wish to be heard in support of our submission.

### Overall position

We acknowledge that New Zealand is in the grip of a housing crisis due to housing supply not meeting demand. We also acknowledge that different types of housing at different price points are needed.

We do not oppose adjusting the zone settings within the Rural Zone to enable more housing. Being able to live rurally but still close to urban areas is a very attractive lifestyle choice which should be made available to more people.

But, decisions about how many houses are built and where must be carefully considered; and all risks and issues appropriately mitigated. Also, genuine consultation with rural communities must occur (not just appear to occur). Too often, consultation with communities is seen as an obstacle or threat to be overcome.

Rural communities have invested a lot into their communities (and not just in financial terms) and are rightfully protective of it. We have a right to receive honest and comprehensive information about changes being proposed. We also have a right to expect that our voice will be given at least the same weight as any other key stakeholder.

So, while we do support many aspects of the proposed provisions, there have been significant deficiencies in the consultation process and information made available:

- The Council has not acted in accordance with some of the principles of consultation set out by the Environment Court:
  - The scale and nature of changes between the provisions that were publicly consulted on in 2021 and the proposed provisions released in 2023 are so significant that no reasonable person could say that the nature and object of the 2021 consultation relates to the circumstances presented in 2023;
  - The community has not been given a reasonable opportunity to state their views on the Berketts' Farm Precinct. This Precinct was not included in the

2021 consultation. The first time that the community was made aware of this proposed development was when the 2023 Proposed Provisions document was released in October 2023;

- The way that the Berketts' Farm Precinct is presented suggests that this development is a 'done deal' therefore the Council does not appear to be approaching the consultation with an open mind; and
  - The information provided in the proposed changes are not enough for those being consulted to know what is being proposed.
- The quality and comprehensiveness of the information provided on Berketts' Farm Precinct is seriously deficient. 125 words across two documents and a vague map with no identifying landmarks is not good enough. Smaller development proposals within rural Upper Hutt have come under far more scrutiny than the Council appears to require from the developers of Berketts' Farm Precinct.

We have provided more detailed comments in the following pages.

**Request for change/Relief being sought:** Put the review on hold until the community have been genuinely consulted and appropriate assessment of the impact of the proposed Berketts' Farm Precinct has been undertaken and published.

Thank you for the opportunity to voice our concerns and for your careful consideration.

Lisa and Andrew Plimmer

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## 1. Adequacy of consultation

The Environment Court, which is the primary judicial decision-making body under the Resource Management Act, has developed a statement of principles to guide councils when consulting on proposals or other matters<sup>1</sup>. These principles are centred on fairness and transparency.

While Council appears to be acting in accordance with some of these principles, there are four on which Council has fallen short:

### 1.1. The nature and object of consultation must be related to the circumstances.

Paragraph 20 of the Introductory Section 32 Report states that '*Genuine engagement with the community has been a guiding principle for the development of PC50.*' It goes on to say: '*A key milestone for PC50 was the release of a draft set of provisions for the community to provide feedback on, and this occurred in July 2021.*'

While the essence of some of the provisions contained within the 2021 draft have been reflected in the 2023 Proposed Provisions document, the details bear very little resemblance. Therefore, the Council cannot claim that there has been genuine engagement when the current proposed provisions are so very different to those that were consulted on. No reasonable person would say that the nature and object of the 2021 consultation was related to the proposed provisions presented in 2023.

- **Requested change/relief:** put the review on hold until the public have been genuinely consulted on the new proposed provisions.

### 1.2. Those consulted must be given a reasonable opportunity to state their views.

References to the Berketts Farm Precinct within both the 2023 Proposed Provisions document and the Section 32 Evaluation Report suggest this development is a 'done deal'. The community has not been consulted on this development. The first time many people heard of the proposed development was when the proposed provisions document was released in October 2023.

In 2019, Perception Planning Limited prepared a report for the Upper Hutt City Council called *Rural Land Use Assessment for Upper Hutt*<sup>2</sup>. In this report, Perception Planning Limited undertook a SWOT analysis. One of the threats noted (on page 6) was: "*Parts of the rural community have previously been resistant to*

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<sup>1</sup> What are the Underlying Principles – Quality Planning ([www.qualityplanning.org.nz/node/967](http://www.qualityplanning.org.nz/node/967))

<sup>2</sup> Rural Land Use Assessment for Upper Hutt – Perception Planning Limited (<https://www.upperhuttcity.com/files/assets/public/v/1/districtplan/pc50/rural-land-use-assessment-rlua-report.pdf>)

*strategic development, like the Maymorn Structure Plan. The local community will need to be part of the development of any future proposals of this nature.*”

You were advised that the local community should be included during the development of any future proposals but appear to have ignored this regarding Berketts Farm Precinct and the provision changes being proposed to enable this development.

Also, paragraph 21 of the Introductory Section 32 Report notes that “*PC50 which has been notified under Schedule 1 of the RMA has been significantly influenced by the feedback provided by the community, landowners, key stakeholders, iwi and detailed workshops with elected members*”.

Who are these ‘key stakeholders’? Given the scale and nature of the changes between the 2021 and 2023 provisions, it appears that these ‘key stakeholders’ have had a disproportionately larger influence on the Council’s processes than the community (the ratepayers). The community has the right to know who these ‘key stakeholders’ are.

- **Requested change/relief:** put the review on hold until the community have been genuinely consulted on the proposed Berketts Farm Precinct. And specify clearly within the documentation who the ‘key stakeholders’ are.

### **1.3. The parties are to approach consultation with an open mind.**

As noted above, the proposed Berketts Farm Precinct appears to be a ‘done deal’.

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describing the proposed Precinct area plus a map with questionable scaling and no identifying landmarks. Surely a development that is 353 hectares in size deserves more analysis and assessment.

- **Requested change/relief:** put the review on hold while more detailed information, analysis, and assessment is either undertaken or released so that the community is properly informed about the proposed development.
-



## 2. Quality and comprehensiveness of information provided on Berketts' Farm Precinct is inadequate.

### 2.1. Conflicting information across the 2023 Proposed Provisions document

The 2023 Proposed Provisions document contains conflicting information relating to the number of allotments within the proposed Precinct:

- SUB-RUR-57 (on page 52) suggests that there would be 103 allotments.
- The paragraph under Appendix 3 (page 133) suggests there would be up to 100 allotments.
- The table under the Berketts Farm Precinct Development Areas map (page 134) suggests there are 105.

How many are planned?

- **Requested change/relief:** update the Proposed Provisions document to reflect the correct number of allotments proposed.

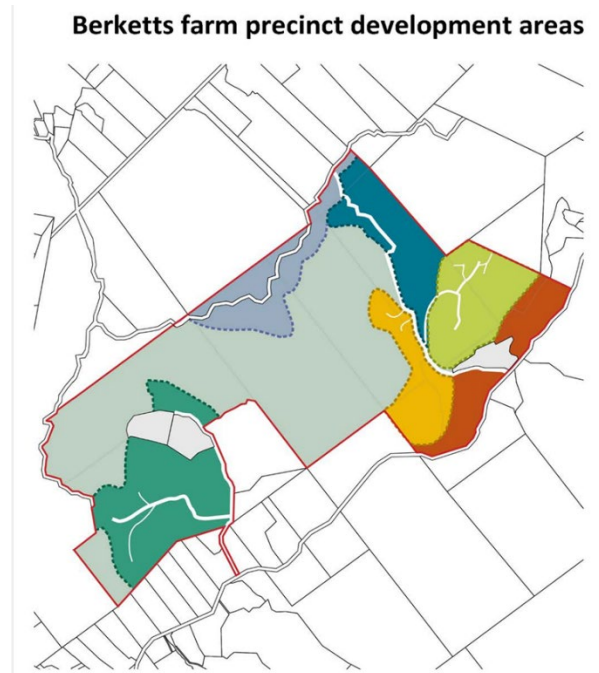
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To the right is the map in the Berketts' Farm Precinct Structure Plan in Appendix 3. We presume the intention of this map is to notify the community as to where the proposed location of the development is and what it might look like.

However, there are no road names or identifying landmarks that the community can use to figure out where it could be.

On 8 November (just nine days before submissions were due to close) I, and many others in the community, finally found out exactly where the proposed development was planned to go. We attended a community meeting to discuss the plan changes at a property that is right on the boundary of the proposed area.

It is not the responsibility of a small number of community members to make the rest of the community aware of the location. You have an obligation to make sure that those you are consulting with have at least a basic understanding of the proposals.



- **Requested change/relief:** update the Proposed Provisions document to properly identify the location of the proposed development.

### **2.3. The amount of analysis and assessment provided is not commensurate with the scale of the proposed development.**

Between the 2023 Proposed Provisions document and the Section 32 Evaluation Report, there are 125 words describing the proposed Precinct area plus one map with questionable scaling and no identifying landmarks. Surely a development that is 353 hectares in size warrants more analysis and assessment.

In comparison:

- *Private Plan Change 55 – Gabites Block*<sup>3</sup> refers to the rezoning of 74.5 hectares of land in Maymorn Road, Maymorn, Upper Hutt. That Plan Change included the following:
  - Archaeological Assessment
  - Integrated Transport Assessment
  - Landscape Analysis
  - Geotechnical Assessment
  - Soil Contamination Assessment
  - Soil and Land Use Capacity Assessment.
- *Private Plan Change 51 – Rezoning of Riverside Farm*<sup>4</sup> relates to the rezoning of a 77.8-hectare site in Mangaroa Valley. The Structure Plan for this allotment was 34 pages long (versus 73 words for Berketts Farm Precinct). The Plan Change also included the following:
  - Landscape Assessment
  - Engineering Assessment
  - Traffic Assessment Report
  - Farm Plans
- **Requested change/relief:** either,
  - a) [if these assessments haven't been undertaken yet] put the review on hold until similar assessments and analysis is undertaken on the Berketts Farm

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<sup>3</sup> Private Plan Change 554 – Gabites Bock (<https://www.upperhuttcity.com/Home/Tabs/New-page/Your-Council/Plans-policies-bylaws-and-reports/District-Plan/PPC-55>)

<sup>4</sup> Private Plan Change 51 – Rezoning of Riverside Farm (<https://letskorero.upperhuttcity.com/68366/widgets/335583/documents/201175> )

Precinct area and released to the community so that they can understand what is being proposed; or

- b) [if these assessments have been undertaken] put the review on hold and publish these assessments so that the community can look at the information and understand what is being proposed.

#### **2.4. The Council is underestimating the scale and significance of the effects of development.**

On pages 232 and 233 of the Section 32 Evaluation Report, the Council have scored the scale and significance of the Berketts Farm Precinct area at 10 points out of 35 (the lower the score the lower the scale and significance of the effects).

The most significant understatement is regarding **who and how many will be affected, geographic scale of effects**. The evaluation score given to this criterion is 1 (i.e., low). The summary of effects justifying this score is "*Localised as it is only restricted to the 353 hectares covered by the Precinct*".

This low score does not make sense. If the proposed Precinct area were to go ahead it would increase the number of properties within the Valley significantly. We estimate there could be about 300 existing properties in the Valley. An additional 100 properties mean an increase of a third%. This rapid and concentrated growth will most certainly affect the Valley more broadly.

Let's stop ignoring the 'elephant in the room': **roading**. Claiming that the only geographic area that is impacted will be the 353 hectares covered by the Precinct feels like a gross over-simplification. Surely Council is not thinking that the residents in the Precinct will not travel outside the boundaries of the 353 hectares.

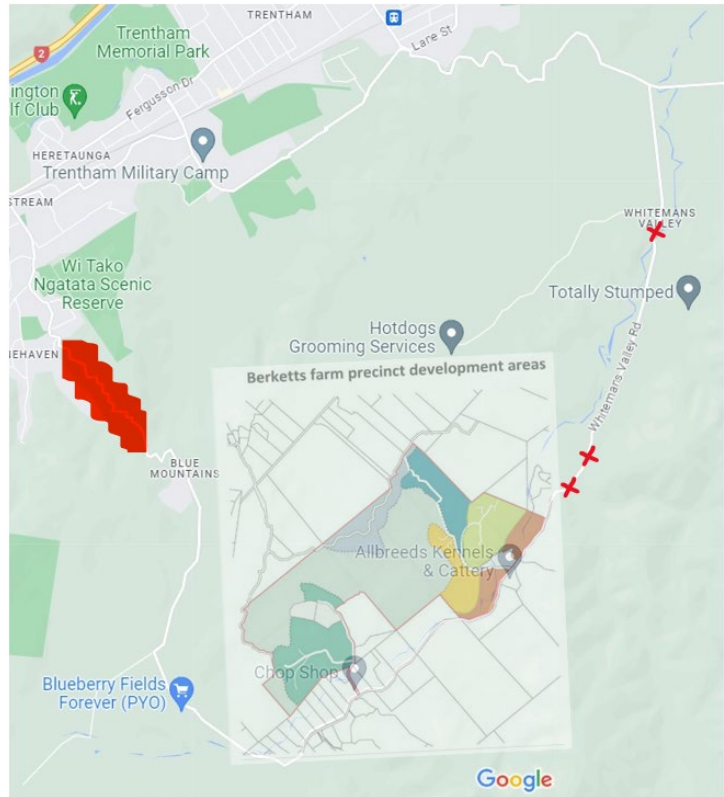
The residents will have jobs in Upper Hutt, Lower Hutt, or Wellington that they need to get to; they may have children that need to get to school; they will have friends and family that will want to visit etc. This all results in increased traffic on the Valley's roads.

One drive right through the valley should be enough to know that adding 100 properties will have more than just a 'low' impact.

### Traffic coming out of Berketts' Farm Precinct will face constraints in both directions.

Based on what we have learned about the location of the Berketts' Farm Precinct, we have managed to overlay a map of the valley with the map provided in Appendix 3 of the 2023 Proposed Provisions Document (see below).

The proposed Precinct area lies right between a set of three one-lane bridges (indicated by the three red 'x') and Blue Mountains Road – a steep, narrow, windy road (indicated by the red shaded area). In both directions, free traffic flow is difficult.



A major upgrade of the main distribution roads through and out of the valley is needed before further developments proceed.

This is supported by SUB-RUR-13 in the Operative District Plan<sup>5</sup> which states: *'Blue Mountains Road requires major upgrading to accommodate further development, and this may result in significant adverse environmental impacts'*. The Operative District Plan goes on to say: *'The present capacity of Blue Mountains Road is a limiting factor in considering development proposals in areas served by it'*.

This is echoed in paragraph 116 of the Upper Hutt Rural Land Use Assessment Report<sup>6</sup> prepared by Perception Planning Limited in 2019 which states: *'Many of the rural roads in Upper Hutt are narrow, winding and steep, with single lane bridges ... Unless developers are required to contribute to the upgrades of such roads to improve their resilience and capacity, it does not seem appropriate to accommodate further rural residential development in these areas.'*

<sup>5</sup> Operative District Plan: <https://www.upperhuttcity.com/files/assets/public/v/6/districtplan/operative-district-plan/uhcc-full-plan.pdf>

<sup>6</sup> Rural Land Use Assessment for Upper Hutt – Perception Planning Limited ( <https://www.upperhuttcity.com/files/assets/public/v/1/districtplan/pc50/rural-land-use-assessment-rlua-report.pdf>)

The current number of Valley residents struggle with the Road. Not a week goes by without at least one complaint on the Valley Facebook page about a near-miss on that road. I, Andrew, have had first-hand experience of that type of driving when I was injured in a head-on collision in 2021 when a driver coming up the hill came around a corner on the wrong side of the road.

Also, the nature of rural living means there will be large vehicles on narrow roads. In summer, tractors and hay bailers are common sights on the Valley roads. With forestry being a key industry in rural Upper Hutt and forests within Whitemans Valley reaching maturity, logging trucks manoeuvring along Whitemans Valley Road and up and down Blue Mountains Road is becoming increasingly common. There have been three log harvests within the last two years (two on Blue Mountains Road and one on Russells Road) plus another two planned for Russells Road – one starting shortly and another in the planning phase.

There is no information within the Berketts' Farm Precinct Structure Plan which identifies measures to mitigate the additional strain to that will be placed on already strained roading.

- **Requested change/relief:**
  - a) [if an assessment of the traffic impacts and identification of mitigation measures hasn't been undertaken yet] put the review on hold until a traffic assessment has been done and mitigation measures identified; or
  - b) [if an assessment of traffic impacts and identification of mitigation measures have been undertaken] put the review on hold and publish the traffic assessment and mitigation measures identified so that the community can look at the information and understand what is being proposed.

There is no information within the Structure Plan which provides a mitigation to the fact that the roads are already under pressure.

### **Access points from the Berketts' Farm Precinct on to Whitemans Valley Road**

The proposed standard – TP-S10 – states that the maximum number of allotments accessed via a right of way or private road must be no more than six. The rationale for this maximum is that it will result in a safer transport network. However, with around 100 properties planned in the Berketts' Farm Precinct, there must be plans to add 16-18 access roads along a 3km stretch of Whitemans Valley Road. How can this possibly result in a safer transport network?

- **Requested change/relief:** put the review on hold until Council and the developers can provide a mitigation strategy for the additional strain to that will be placed on already strained roading.

