

SUBMISSION 222

Name (Please use your full name)

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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

Please see attached documents.

My submission is that

Please see attached documents.

I seek the following decision from the local authority

Please see attached documents.

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.

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/2ede1811f2e6ad40ba54d23e38bf8fb11b991e2b/original/1700192685/05f427f35dfa7e1bc5dbca20f20548f9_PC_50_Rural_-_Submission_-_Mary_Beth_Taylor.doc?1700192685

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.

It was impossible for me to open and check the Word file I attached. Is it possible to send through a PDF?

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15 November 2023

PC50 Rural Review

Musings of a submitter on our relationship with the Land.

We came as cruel colonisers.

We became clumsy collaborators.

Can we be compassionate kaitiaki?

Below is my submission to the Upper Hutt City Council in relation to this consultation.

I could not gain an advantage in trade competition through this submission.

I wish to be heard in support of this submission.

General Comments

In general I am in general agreement with the proposed four zone descriptions, proposed objectives, policies and rules.

I do, however, have concerns about the omission of definitions and abbreviations in the introductory material and the omission of some relevant background information and recent environmentally protective legislation that underpins PC50 Rural. I have very serious concerns around the extent of the proposed rural zones and severity of zoning changes in some rural areas. I am totally opposed to the Berketts Farm Precinct.

There are limits to growth and development in our city. We are already feeling the effects of exceeding limits to growth on the local environment. The factors that naturally limit growth must be explored, understood and respected. These limits must form part of the land use decisions and zoning that will protect and enhance a thriving environment for all species. It's not just about us.

I would also like to propose some additions to the PC50 Rural Review.

I will present my concerns and additions in a table following these general comments:

PC50 Rural focus group

As a member of the PC 50 Rural Focus Group 2019 to 2021, I can see how this group's collective input has been valued and included in the consultation material.

In our earliest sessions members were asked to project our thinking out 50 years and to imagine “How Upper Hutt would look in 2070?” We took time to define what ‘rural’ means to our community and its importance to well-being. We discussed zoning for the future, not for the current land owners and developers. We brainstormed zone definitions, objectives, policies and rules. We re-hashed the history of the Maymorn Structure Plan to help inform better zoning decisions in that area. At the end of our focus group consultation we had reached general agreement on the earlier draft of PC50 Rural.

Focus group members I have spoken to recently are disappointed with the severe changes made between the earlier draft and the current draft consultation version before us.

Snippets from the Land Use Strategy 2016 as a reminder

Please add these points to pg 9 Section 32 Report point 17

Recent consultation highlighted some key outcomes that residents of the **rural area** saw as important:

Future development needs to be in keeping with the surrounding environment

- Rural landscape, natural and amenity values should be maintained
- Infrastructure needs to adequately accommodate future development
- The rights of established rural activities should be protected
- Maintaining or improving water quality and biodiversity is important

Desired environment outcomes

1. Appropriate protection for the qualities of the environment that contribute to the city’s image, identity and biodiversity
2. Identification of significant natural areas, followed by ensuring that these are appropriately managed and protected, particularly where they contribute to enhancing networks
3. Careful and sustainable long-term management of growth so that development pressure on the quality of natural areas and the rural environment is minimized.

Housing capacity and affordable housing

- The UHCC IPI and the HBA indicate that there will be at least sufficient capacity for new dwellings over the next 30+ years and that housing demand is expected to be largely met through urban intensification.
 - **Please apply these tools to PC50 Rural zoning extents.**
- This means that intensifying zoning provisions and extents in the rural areas will not be needed in the foreseeable future.
- Rezoning rural areas to produce small numbers of costly and unaffordable housing will not solve a housing crisis.
- Rural housing and infrastructure is generally very costly to build and maintain.

Zoning pressures

- Current ownership and developer pressure should not determine PC 50 Rural zoning extents for future land use.
- Zoning priorities should respond to:

1. Environmental protection (NPS IB, NPS FM, RRP)
2. Human housing needs (UHCC IPI, HBA, PC50 Residential)
3. Please use these resources to support good zoning extent decisions, not current landowners and developers.

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

PC50 Rural Provisions:

Definitions and abbreviations
Transport (Roading)
Minimum requirements for subdivision
Zoning extents in Whitemans Valley
Appendix 3 - Berketts Farm Precinct
Additional Precincts
Wallaceville Church

Please see table that follows which sets out the Provisions/Concerns, Descriptions and Decisions/Changes Sought from Council.

My submission is that:

Please see table that follows which sets out the Provisions/Concerns, Descriptions and Decisions/Changes Sought from Council.

I seek the following decision from the local authority:

Please see table that follows which sets out the Provisions/Concerns, Descriptions and Decisions/Changes Sought from Council.

PC50 Rural Review – Table - MB Taylor

Provision/Concern	Description	Decision/Change Sought
<p>Definitions and abbreviations missing: pg 1-29</p>	<ul style="list-style-type: none"> • Precinct • Peatland • NPS IB • NPS UD • NPS FM • Draft GW Future Development Strategy • UHCC IPI 	<p>Add definitions and abbreviations to draft proposed provisions of PC 50 Rural Review and Section 32 Report</p>
<p>Omissions: PC50 Rural does not satisfactorily give effect to all of the relevant national policy statements and the Wellington Regional Policy Statement (WRPS) and does not correctly align with other strategies and relevant plans and policies, draft or published.</p>	<ul style="list-style-type: none"> • NPS IB – 4 August 2023 1.5 Decision-making principles of the NPS IB <ul style="list-style-type: none"> ○ NPS IB signifies a shift in tone and intention that must be applied to PC50 Rural. ○ Future land use and development will recognise the obligation and responsibility of care that council, community and land owners have as kaitiaki/stewards of indigenous biodiversity. This begins with the District Plan which will support the protection and enhancement of IB on all lands within our city, both rural and urban. • UHCC PC47 Natural Hazards (especially slope risk in rural areas) • GW Draft Future Development Strategy November 2023 This strategy signifies a shift in tone and intention that must be applied to PC50 Rural. • IPI UHCC requested an extension from the Ministry for the Environment of four months to make a decision 	<p>Add reference to these policy statements, plan changes, strategies and planning tools to the Draft PC50 Rural Review and Section 32 Report. Indicate in PC50 Rural how the review will give effect to these policy statements, strategies and relevant plans, draft or published.</p>

on the IPI from the original date of 20 August 2023 to **20 December 2023**. This tool will indicate that Upper Hutt will have more than sufficient capacity for dwellings over the next 30+ years within the urban and transitional urban/rural areas.

- **HBA 2022 update**
indicates sufficient housing capacity for next 30 years
- **NPS UD 2020** Rural development must be considered alongside urban development , not in silos.
- **NPS FM 2020** Reference to the importance of water and the protection of the quality and quantity of fresh water in the rural areas of Upper Hutt as it contributes to the health and well-being of the wider environment. The Mangaroa River that runs from the Blue Mountains through Whitemans and Mangaroa Valleys, through Maymorn and into Te Awakairangi at Te Marua is one of the most contaminated rivers in the region.
- **Draft PC50 Residential**
Rural zoning must be considered alongside Residential (urban) zoning, not in silos.
- **Affordable Housing Strategy 2020**
Ensure PC50 assists in delivering affordable housing outcomes, in addition to a net increase in supply of new housing. Focus on urban areas.

<p>Transport</p> <p>TP-R3 Traffic generation complying with TP-S9</p> <p>TP-S9 Traffic generation for any site shall not exceed:</p> <ul style="list-style-type: none"> • 100 vehicle movements per day in the General rural, Rural production, Rural lifestyle zones. • 250 vehicle movements per day in the Settlement zone. <p>TP-MC1</p>	<p>Current rural roading is inadequate for further rural development in terms of safety and capacity.</p> <p>Rural roads in NZ are notoriously dangerous and the rural roads in Upper Hutt are no exception. Huge amount of resource would be needed to upgrade and maintain the local rural roading network. There are limits to what Council can do and what rate payers will contribute to ongoing roading costs.</p> <ul style="list-style-type: none"> • How and when will this happen? • Why is Berketts Farm Precinct not mentioned in TP-R3? <p>These are unrealistically low estimations. Based on my experience living on KMD in a rural lifestyle zone of approx.160 allotments for 37 years with no public transportation these estimations must be upgraded to reflect the reality of the current situation looking to the future.</p> <p>Do these movements include school bus movements or construction vehicles?</p> <ul style="list-style-type: none"> • There are current traffic problems in the Whitemans and Mangaroa Valley, and Maymorn areas. • There are current accessibility issues for cyclists, pedestrians and horse riders. • There is current conflict 	<p>Improve the safety and capacity of rural roading in Upper Hutt well in advance of rural zoning changes and further subdivision.</p> <p>Provide timelines for rural roading improvements.</p> <p>Include Berketts Farm Precinct in PC50 Rural Transport Provisions.</p> <p>These estimations must be upgraded to reflect the current situation looking to the future.</p> <p>Suggest increasing movements to 200 movements per day in the General rural, Rural Production, Rural lifestyle zones. Suggest increasing movements to 350 movements per day in the Settlement zone.</p> <ul style="list-style-type: none"> • Suggest improving existing rural roads well in advance of intensifying zoning and road usage in the rural areas.
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<p>TP-SCHED 1 Hierarchy</p>	<p>between motorists and cyclists.</p> <ul style="list-style-type: none"> • The existing roading network in the Whitemans and Mangaroa Valley, and Maymorn areas will be unable to cater for increased traffic generation especially at the one lane bridges and entrances and exits to the valleys onto State Highway 2 • Rural distributor routes are low priority on the roading hierarchy. <p>Most rural roads are currently 80kph speed limit which is excessive and dangerous. What speed limits will be imposed on rural roads in PC50 Rural?</p> <p>Current rural residents have had to sacrifice many of their simple rural activities and pleasures as a result of rural intensification over the past 20 years or more. Walking, cycling, dog walking and horse riding alongside rural roads are now considered dangerous activities in the rural community.</p>	<p>Any rural subdivision activity must be preceded by significant roading improvements to accommodate increased movements.</p> <p>Suggest maximum 60kph speed limits in the PC50 Rural zones.</p> <p>The provision for cycle lanes or shared pathways is essential for the rural zones. These should be provided in advance of zoning intensification in the rural areas.</p> <p>Suggest consideration for widening the single lane bridges in the rural zones to two lanes.</p>
<p>Pg 48 PC50 Rural Review: Minimum requirements for subdivision</p>	<p>Query around minimum net site area for General Rural. Average lot size for General Rural is 20 ha.</p> <p>Is 1 ha correct for minimum net site area for General Rural?</p>	<p>Please clarify reasoning behind the 1 ha minimum net site area for General Rural. Correct if needed.</p>
<p>Zone extents are overly and aggressively applied, especially for Whitemans Valley.</p>	<p>Rural lifestyle zoning change from the entrance to Katherine Mansfield Drive (KMD) along the eastern side of Whitemans Valley Road to</p>	<p>Maintain operative DP zoning, Rural Production and General Rural, for land from the entrance to KMD east along</p>

	<p>the Berkett Farm is inconsistent with Rural Production and General Rural zoning on west side of Whitemans Valley Road.</p> <p>This is a zoning change never discussed in the PC50 Rural focus group. It is an unpleasant surprise.</p> <p>In light of the adequate provision for future housing capacity in Upper Hutt, this zone change is completely unnecessary. There is no need for housing intensification in this area.</p> <p>This zoning change would cause fragmentation in the rural area and would be disruptive to the rural amenity of the zone.</p> <p>This proposed Rural lifestyle zone change would necessitate the building of bridge/s over the Mangaroa River that separates this proposed zone change from Whitemans Valley Road. This is costly and environmentally risky.</p>	<p>Whitemans Valley Road through to the Berkett Farm.</p>
<p>Appendix 3: Berketts Farm Precinct</p> <p>SUB-RUR-O5</p> <p>SUB-RUR-S7</p>	<p>Berketts Farm Precinct was never proposed or discussed in the PC50 Rural focus group. It is another unpleasant surprise.</p> <p>This would be a very unwelcome anomaly in one of the deepest rural areas of the valley.</p> <p>Rural intensification to this level and in this area is completely unneeded.</p> <p>Section 32 Report states <i>"The Precinct is located on</i></p>	<p>Remove the Berketts Farm Precinct from PC50 Rural in its entirety.</p> <p>Maintain the General Rural and Rural Production zoning for the Berketts Farm Precinct.</p> <p>This land should be available to future farmers for productive purposes or to return to native bush.</p> <p>Correct reference in Section 32 Report to the</p>

	<p>number of domestic predators.</p> <ul style="list-style-type: none"> • Where humans settle biodiversity inevitably suffers and diminishes. NPS IB states no further biodiversity loss. • Unacceptable additional rural roading stress is too costly to the community and environment (TP-P1). • ‘Out of sight...out of mind’ zoning style is a Professional Planning FAIL (won’t be visible from Whitemans Valley Road). • The Berketts Farm Precinct borders (at the ridgeline) with many of the lifestyle properties along the southern end of Katherine Mansfield Drive. It will be visible and noticeable to these residents. • KMD residents will be negatively affected by having 100+ additional dwellings on small sections and their associated activities, domestic animals, domestic predators just over their upper boundary fences. • Very human-centric approach to zoning that ignores the effects of intensification on the rural environment, habitat, species and existing rural residents. 	<ul style="list-style-type: none"> • Develop an action plan to mitigate the effects of the Berkett Farm Precinct on the residents of Katherine Mansfield Drive.
<p>Additional Precincts:</p> <p>1. Mangaroo Peatland Energy and Conservation Precinct</p>	<p>The regional Flood Hazard Extent maps make it clear that the Mangaroo Peatland is not suitable for additional subdivision.</p> <p>Create:</p> <ul style="list-style-type: none"> o Solar farm on southern most degraded area of the 	<p>Establish the Mangaroo Peatland Energy and Conservation Precinct on the Mangaroo Peatland in PC50 Rural.</p> <p>Engage renewable energy experts (EECA and</p>

<p>2. Kidd Farm Village Precinct</p>	<p>peatland.</p> <ul style="list-style-type: none"> ○ Enable local renewable electricity generation /distribution activities. ○ Light grazing would still be available. <ul style="list-style-type: none"> ○ Open Space reserve on the most viable northern SNA area of the peatland. ○ Protect, restore, reconstruct peatland ecosystems. ○ Re-introduce species. ○ Create regional park with eco-tourism potential. <ul style="list-style-type: none"> ○ Hold the place for a future rural village near the junction of Mangaroa and Whitemans Valley Roads. ○ Currently zoned Rural Production. ○ Provide space and planning for community facilities including community centre, café, commercial kitchen, general store, PO, learning centre, farm stay accommodation. ○ Incorporate parking space for Wallaceville Church. 	<p>others) to conduct a feasibility study into the creation of a solar farm on the peatland. (Step 1)</p> <p>Engage with land owners.</p> <p>The Mangaroa Peatland has the potential to provide ongoing eco-system services including carbon sequestration, water filtration, flood mitigation, species habitat.</p> <p>Engage ecologists to assess the Mangaroa Peatland. It would need thorough and comprehensive assessment of the geomorphology, hydrology, botanical and biological features.</p> <p>NPS IB and NPS FM provide environmental protection on private as well as public lands. The Mangaroa Peatland is currently in private ownership.</p> <p>Engage with land owners.</p>
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<p>Wallaceville Church 1893</p>	<p>○ This is a historic, cultural, architectural taonga that currently has no protective status.</p>	<p>Assess this historic, cultural, architectural resource under the NPS Historic Heritage for protection.</p> <p>Engage with owners/trust.</p>
<p>Extend Rural lifestyle zoning extent at Maymorn</p>	<p>There may be space for an additional Rural Lifestyle zone on ridgeline that runs from the end of Parkes Line Road by the Maymorn entrance to Pakuratahi Forest Park SW toward Colletts Road.</p> <ul style="list-style-type: none"> • Currently zoned General Rural. • Would transition into Maymorn Farm PPC55 and the Settlement zone. • Would be similar to the Katherine Mansfield Drive subdivision. • Access would be a dead-end road, not connected to Colletts Road. • This idea was put forward by UHCC planner Ike and discussed during PC50 Rural focus group. 	<p>Assess the feasibility of an additional Rural Lifestyle zone at Maymorn.</p>