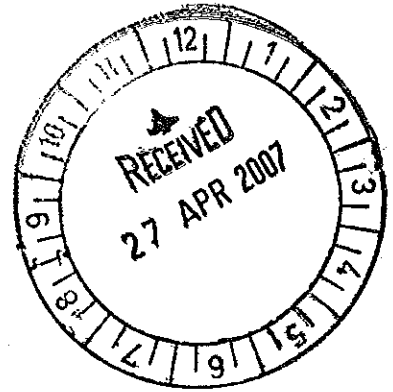


SUBMISSION
27 APR 2007
NO: 7



SUBMISSION ON PROPOSED PLAN CHANGE
Clause 6 of First Schedule, Resource Management Act 1991

To Porirua City Council, Cobham Court, P O Box 50 218, Porirua City, New Zealand

Name of Submitter: [Full name] BLOOMFIELD FAMILY TRUST

ALLAN ULAF BLOOMFIELD & MYREINE ALICE BLOOMFIELD

This is a submission on the following proposed plan change to the Porirua City District Plan.

EQM FARMING - PRIVATE PLAN CHANGE TO
PORIRUA DISTRICT PLAN
[name of proposed plan change]

The specific provisions of proposed plan change that my submission relates to are:
[give details]

a.

SEE ATTACHMENT ITEMS 1.a, 2.a,
3.a, 4.a, 5.a, 6.a, 7.a, SUMMARY

[continue on separate sheet(s) if necessary]

b.

My submission is:
[include-

- whether you support or oppose the specific provisions or wish to have them amended; and*
- reasons for your views.]*

SEE ATTACHMENT ITEMS 1b, 2b,
3b, 4b, 5b, 6b, 7b, SUMMARY

[continue on separate sheet(s) if necessary]

C. I seek the following decision from the Porirua City Council:
[Give precise details.]

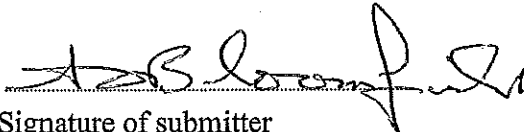
SEE ATTACHMENT ITEMS 1c, 2c,
3c, 4c, 5c, 6c, 7c, SUMMARY

[continue on separate sheet(s) if necessary]

I wish (~~or do not wish~~) to be heard in support of my submission.
[please delete one option]

~~*If others make a similar submission, I will consider presenting a joint case with them at a hearing.~~

*Delete if you would not consider presenting a joint case



Signature of submitter

[or person authorised to sign on behalf of the submitter.]

27 APRIL 07

Date:

(A signature is not required if you make your submission by electronic means)

Address for service of the submitter:

51 BRADLEY RD,
PAUATAHANUI
PORIRUA CITY

Telephone number:

2341166

Fax/email:

(04) 2341166
a.bloomfield@paradise.net.nz

Contact Person: [name and designation, if applicable]

ALAN BLOOMFIELD - TRUSTEE.

**Submission; EQM Farming Application for a Private Plan Change
Objections**

1. a. We object to this application proceeding at this point in time.

b. It seems that this application by EQM Farming for a Private Plan Change to the District Plan is being fast tracked with almost indecent haste. Given that the Rural District Plan is to be reviewed within the next eighteen Months, any decision to grant this application now will surely compromise and prejudice that review.

The most likely objections to this Plan Change will, in the main, only come from those property owners who are in close proximity to the proposed development and/or directly effected. Conversely, the review of the total Rural District Plan will probably receive submissions from a much wider representation of the Porirua community. Approving this application now will remove the ability for much wider representative consultation.

c. We believe that this application should not proceed at this time but should be included in the review of the total Rural District Plan when it occurs.

2. a. We object to this proposal for a forty minimum? Cluster housing development at Judgeford Hills.

b. There is already a village(Pauatahanui) in the Rural Zone consisting of some fourteen houses plus services. Why on earth would the Porirua City Council wish to approve what amounts to an additional village some 250% larger?

We can not understand why this area of land could not be developed into conventional Lifestyle Blocks within the restrictions and conditions that apply in the current Rural District Plan. Much of the "Economic Analysis of Alternative Land Uses" attached to this application is factually and practically incorrect. For example it is surprising that to arrive at the number of 5ha minimum size lifestyle blocks the Author's simply divided the total land area by 5ha and arrived at a total of thirty.

It would not have been too difficult to establish that the Elmwood Subdivision consists of fourteen Lifestyle Blocks at an average size of 7.5ha. We have no reason to believe that the Developer was overly generous and that he would not have tried to get more Lot's out of the available land. The reason that he could not was because of the land form, access considerations, Covenanted of Significant Ecological Areas, roads, main transmission lines, Easements and practical considerations of where boundary fencing needed to be placed. All of these factors are just as applicable to the Judgeford Hills development. An error of this magnitude casts doubts on the accuracy of the rest of this Analysis.

In our view, only a maximum of twenty Lifestyle Blocks could be established with may be four to six obtaining access via Belmont Road.

Currently, bare Life style Blocks are on the market for \$520,000 to \$699,000 in the Judgeford Area. If we assume an average selling price of \$500,000 for Lifestyle Block's in the Judgeford Hills subdivision this would provide a gross return of \$10,000,000 and with considerably lower development costs than the Cluster Housing proposal.

Given the above what is the real long term agenda of EQM Farming?

This is only one example of the somewhat dubious figures and statements in the "Economic Analysis of Alternative Land Uses contained in this application.

Allowing this Plan Change will, in effect, reduce the minimum lot sizes to 2.5ha (double the number of possible 5ha minimum lifestyle blocks) on this development. This in turn will mean that the District Plan Review will, without wider consultation, be forced to accept a 2.5ha minimum lot size in the future and also lead to the subdivision of existing 5ha lots.

c. We believe this application should be declined and suggest that a conventional Rural development be progressed, to which we (and probably most Bradey Road residents) would have no objection.

3. a. **We object to a traffic increase on Bradey Road of 333%. This is not the minor increase that the Applicant's refers to in their submission.**

b. Given that this development fronts Belmont Road the Developer should be required to upgrade Belmont Road at no cost to the Council and use this Road for all access. This is a cost that the Council would have to face at some time in the future, so this Development gives them an opportunity to have the upgrade carried out without cost to ratepayers.

The request by EQM Farming for a Private Road will eventually become a long term cost to the Council and it's Ratepayers and is nothing more than a subsidy to a Private Developer.

The initial Resource Consent in 1995 for the Elmwood (Bradey Road) subdivision required that Developer to install a two lane bridge to service a total of twelve Properties. This requirement was later rejected by the Environment Court and a single lane bridge installed. If in 1995 the Porirua City Council required a two lane bridge to service twelve properties then surely they need to specify a two lane bridge to service a total of fifty two or more properties. If they do not, then at some time in the future Ratepayers will be faced with the cost of upgrading the current one lane bridge. Perhaps this is another subsidy for this Developer?

Currently Bradey Road is deteriorating badly in several areas where the road foundations have started to sink. Increasing the traffic volume by 333% will surely accelerate these problems and create another unneeded cost to Ratepayers.

If indeed Bradey Road becomes a future access to the Belmont Regional Park why is not a Road Reserve shown to the Southern boundary of the Judgeford Hills Subdivision? In addition it should be recognised that in the event of a major Wind Farm being established within the Belmont Regional Park, Bradey Road and it's extension could become the preferred route for large volumes of heavy construction traffic. That would be very bad news for the existing one lane bridge and the failing road foundations!

c. **For a forty plus development the only roading option should be a redeveloped Belmont Road at the developer's cost.**

As an alternative, a twenty lot Lifestyle Block development, with four to six lots accessing via Belmont road and the remaining fourteen to sixteen lots accessing via Bradey Road and the existing one lane bridge.

4. a. **We object to the contents of Section 2.2 of the "Economic Analysis of Alternative Land Uses".**

b. The above section try's to make a case against traditional 5ha minimum size Lifestyle Blocks but is factually incorrect.

The Elmwood Subdivision in Bradey Road has been established for seven to ten years. These Lifestyle Blocks have made a major contribution to an improved environment, improved and more intensive land use. Beautification, weed control, fertiliser application, pest control, fencing, an enormously reduced Carbon Footprint and significant protection and regeneration of Native plants and Forest. Just to reinforce the above in excess of 20,000 trees have been planted in the Elmwood Subdivision to date!

All through this application there is absolutely no indication that either the present EQM Farming operation nor the proposed development will ever achieve the standards that have already been achieved by the current Life style Blocks in Bradey Road.

c. **We believe the hearing should ignore totally the factually incorrect assumptions in Section 2.2 of the 'Economic Analysis of Alternative Land Uses'.**

5.
 - a. **We object to Standard D4A.7.1 on Page 39 requiring no Reserve Contribution be made by this Developer.**
 - b. All other Developer's provide infrastructure but still have to provide a Reserve Contribution in cash or kind. Why should this applicant be subsidised once again by not having to make a contribution?
 - c. **This developer should be liable for the self same Reserve Contributions as any other Developer.**

6.
 - a. **We object to the Primary Production land having a minimum subdivision area of 30ha. (D4A.5.1.) Page 38.**
 - b. This entire scheme is predicated on the Primary Production Area being "part of the whole" and available for access to all of the purchaser's of Cluster Housing for recreational purposes and access. Accordingly any future subdivision could lead to this area not being available for the purposes for which it was created. All that then would be left would be a village of 0.2ha lots!
 - c. **No future subdivision of any sort should be allowed to any part of the Judgeford Hills subdivision.**

- 7.a. **We object to the lack of guarantees contained in this proposed Private Plan Change to the District Plan.**
 - b. There is no guarantee that the Capital Gain (gross Profit) of approximately six million dollars will be invested in improving (badly needed) the Primary Production Area. (see Page 6, paragraph 2.4 of the Economic Analysis of Alternative Land Uses).
 There is no guarantee that the Primary Production Area will be excluded from subdivision or additional Cluster Housing (see 6 above).
 There is no guarantee that the Primary Production Area will be accessible for freedom of movement for Cluster Housing Purchaser's for a forty years minimum. Forty years is not an uncommon period for this type of development.
 There is no guarantee that sufficient funds will be put into a Trust for future and ongoing maintenance of a Private Road for forty years.
 - c. **Any Private Plan Change must list, as a minimum, the guarantee's listed above.**

- 8.a. **We object to the lack of quantitative and/or qualitative research to substantiate claims of a market requirement for small Cluster Housing lots (see Page 12, Paragraph 4.3).**
 - b. Purchaser's of these Cluster Housing Lots will have to provide boundary fencing, septic tanks, water tanks and pumps over and above the cost of the Lot and a House. It is difficult to believe that there would be acceptance of these not insubstantial costs just to get a 0.2ha building site.
 - c. **Until qualitative and quantitative market research is available the validity of the claim that there is market demand is more than somewhat suspect.**

Summary

All through this application by EQM Farming they bleat about the uneconomic viability of their farming operation. It is quite apparent that they paid too much for the land, in which case, it was purchased for development purposes rather than for farming.

They do not want to pay for upgrading Belmont Road.

They do not want to pay for a two lane bridge at the entrance to Bradey Road.

They do not want to pay for a Public Road extension to Bradey Road.

They want more Lots, through Cluster Housing, than from a normal Rural Subdivision and

thus increase their total probable gross revenue by more than \$1million.

They do not want to pay a Reserve Contribution.

They want to retain the ownership and further subdivision rights to the Primary Production Land.

They want the Porirua city Council and the Ratepayer's to subsidise their private development.

All of this to attain a 60% Gross Profit (Capital Gain) and with few if any guarantees.

To us, this spells nothing short of greed!

For the Bloomfield Family Trust

A.O.Bloomfield. Trustee

A.O. Bloomfield 27/4/07

M.A.Bloomfield. Trustee

M.A. Bloomfield 27/4/07