

Plimmerton Residents' Association Submission to Porirua City Council on District Plan Review "Housing Intensification Variation 1" and PC19 - September 2022

Thank you for this further opportunity to provide feedback on the proposed variation. We noted in our preliminary feedback in May 2022 that the Housing Intensification Variation (HIV) is in response to the requirements of the NPS-UD and Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, and that there will be elements of that Act that PCC is required to implement.

Our attention remains on those matters which PCC can influence to ensure Porirua continues to be a great place to live. This submission is a high level response rather than one which seeks to influence DP provisions at the individual property or street level except where our general views have that specific effect.

We support:

- The retention and application of plan overlays and consent triggers to protect environmental, cultural and heritage values, to identify coastal, flood and fault hazard zones, and to control development in fragile or unstable environments.
- The retention of SNAs to protect significant natural areas. There are a number of significant SNAs in the Plimmerton Camborne area and we believe all of them to be contributors to the general aesthetic and environmental values of the area. As well as protecting the habitat of native flora and fauna, they are necessary to maintain protection of land that is vulnerable to degradation from heavy rainfall or subject to flooding, subsidence, rising seas etc. With the prospect of future intensification and consequent reduction in garden space, SNAs are an important tool to identify and preserve the natural environment.
- The use of the Residential Design Guide. We would be concerned if use of a clear, enforceable Design Guide was not in place against a background of increased intensification in both existing residential areas and on greenfields sites.
- The strengthening and active monitoring of controls on Subdivision and Earthworks to mitigate the adverse effects of intensification, given the steep topography and previous events with subsidence in cut & fill subdivisions, significant slips and sedimentation. Recent weather and continuing climate change effects should be acknowledged and used as a trigger both to strengthen requirements on developers and more broadly to exclude low lying and unstable areas from the intensification envisaged by the Act altogether.
- The inclusion of the Three Waters chapter - especially the concept of hydraulic neutrality, and the requirement for mitigation where this cannot be met. We'd also like to see developers encouraged to achieve hydraulic positivity in key risk areas where developments can actually improve an existing situation.
- The protection and retention of public outdoor spaces, such as reserve land, parks, recreation areas, and sports grounds.

Our Concerns:

Infrastructure

We have concerns about the overall capacity and quality of infrastructure in our area and its ability to handle projected growth. Much of the existing infrastructure in established areas being rezoned to MRZ or HRZ is already in need of renewal and will not cope with the increased load that intensification will bring. As regards the development of the Northern Growth Area, we would expect PCC to be proactive with central government and, as relevant, Kāinga Ora, in seeking caveats on significant development that ensure provision for increased / improved infrastructure is planned alongside any such development.

Zoning

We have concerns regarding the blanket application of the High Density Zone (HRZ) under provisions for distances from public transport, supermarkets etc. While we recognise the need for additional housing to meet population growth we question the effectiveness of rezoning many existing areas of Plimmerton/Camborne to HRZ to achieve this because:

(1) there are already three significant areas of greenfield growth bordering Plimmerton identified in the Growth Strategy (Plimmerton Farm, Pukerua Bay and Gray Farm), projected to add over 3,000 households. Kāinga Ora has also recently proposed using a Specified Development Project approach (supported by PCC and Ngāti Toa) to accelerate an extension of development for the area south of Pukerua Bay, including the Plimmerton Farm site, which will increase the 3,000 to somewhere in the region of 6,000 additional households for the area overall;

(2) very few of the properties identified for HRZ rezoning in existing parts of Plimmerton/Camborne should be developed as high density complexes because of coastal hazard or natural hazard overlays, topography or site instability. If the areas apart from coastal or natural hazard are given blanket approval for 6 storey developments the result is likely to be tall buildings 'pepper potted' around thereby maximising likely impacts like shading and oppressive bulk alongside lower height dwellings. We suggest better functional, liveability and design outcomes would be achieved by restricting buildings taller than 3 storeys to clusters in more suitable sites where appropriate infrastructure, accessibility and community facilities can be established in a planned manner; and

(3) in respect of sites immediately bordering the coast and flood prone areas, it would now be simply irrational to allow significant development under the HRZ provisions of the Act / NPS-UD. It would also seem to be at odds with the directives of the New Zealand Coastal Policy Statement 2010. PCC has been proactive in wisely deciding to prepare the way for retreat from some low-lying areas. This decision should be strengthened by ensuring that PCC strongly recommends excluding these areas from any HRZ.

Walkable Catchment

We query the "Walkable Catchment" used to set HRZ Boundaries. The Variation 1 HRZ chapter introduction states: *"The High Density Residential Zone has been identified as being suitable for a high density of residential development. This zone is in areas that are within a walkable catchment of the Metropolitan Centre Zone and/or a train station. This zone will contribute to a well-functioning urban environment, including high levels of accessibility to primary schools, shops and services including supermarkets, and local parks."*

There is no definition provided of the terms “walkable catchment” or “high levels of accessibility” which suggests the properties identified as HRZ may have been selected in an arbitrary manner. We urge council to share the basis for setting the HRZ zone boundaries.

We ask council to consider the following:

(1) Walkable by who? A fit 30 year old ? A parent with a baby buggy and a five year old? An elderly person or someone with mobility issues? Someone returning from the supermarket with heavy shopping bags? We ask that the needs of all users are taken into account, especially as less provision is being made for parking of private cars in new developments.

(2) Has topography been taken into account? With so many steep hill sites proposed for HRZ, this factor is important. Walking up or down a steep hill implies quite a different level of “walkability” than walking on the flat. We further note that the walkways in the Plimmerton/Camborne area are generally steep stairways, which cannot be accessed by parents with strollers or less mobile pedestrians.

(3) Another factor complicating the walkability and accessibility of the area is the location of safe pedestrian crossings across the rail line and a four lane State Highway, plus the location of access routes to the station itself.

Topography and Land Instability

Many of the properties designated as HRZ in Plimmerton/Camborne are located on or abutting steep hillsides. While lot sizes may appear large on a planning map there is little flat land available for building, and significant earthworks and retention would be required to excavate and stabilise sites for larger buildings. We note that these areas are already known for land instability and consider the risk of undertaking such major earthworks unacceptable.

Coastal Hazards, Flooding and Climate Change

To reinforce points made above, we note that properties on Plimmerton’s waterfront in South Beach Rd, Steyne Avenue, Beach Rd, Sunset Parade and Moana Rd have been proposed for HRZ rezoning. The latest NZ SeaRise report (<https://www.searise.nz>) predicts the acceleration of climate change effects in this area with sea level rise compounded by vertical land movement. On top of this, we are experiencing severe storm surge effects more frequently, and there is already discussion of insurers refusing cover for affected properties.

It therefore seems ill-advised for council to be proposing further intensification of buildings in this fragile area. While the hazard overlays do provide for consent triggers, it would seem far more sensible to avoid the cost and work involved in the consent process in the first place by removing HRZ designations on these properties.

Other HRZ areas such as James Street have already experienced significant flood events with significant consequences for residents. Again, these areas are marked as flood or stream hazards on the planning maps, and therefore should not be considered for inclusion in the HRZ.

Impact on Existing Properties and Residents in HRZ

While the planned form of a “greenfields” HRZ could allow for the application of design standards and the coordinated development of a common high-rise built form, the proposal to “pepper-pot” these structures into an existing suburban landscape does not.

We are particularly concerned about the effects of shading and loss of privacy on existing properties in the proposed HRZ, with 22 metre buildings able to extend to a metre of site boundaries. While some height controls are being proposed for south facing sloped sites, there is no protection for other existing properties that could be hemmed in by six storey buildings on three sides.

For existing residents these major changes could destroy their enjoyment of their homes and result in negative impacts on their physical and mental health. This consequence is at odds with the objective of clause UFD-07 which states *“A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.”*

We ask that the circumstances and rights of existing property owners and residents are better recognised and reflected in the PDP. Perhaps some distinction might be made between greenfields development and intensification in existing suburban areas? It would currently seem that the Mungavin netball courts are of more concern to council than the future health and wellbeing of existing residents and ratepayers.

Standards

We feel a maximum building coverage standard should be stated for the HRZ. This would provide for adequate permeable surfaces, onsite communal or private recreation spaces and the opportunity for landscaping.

Northern Growth Development Area

We ask that environmental protection for the Taupō Swamp and catchment (similar to that provided for Plimmerton Farm Zone under PC18) be applied to the Northern Growth Development Area.

We have concerns regarding the capacity of existing infrastructure to support the scale of this development.

We note that since Variation 1 was notified Kāinga Ora has announced it is assessing this area as a potential Specified Development Project. We await the outcome of this process.

Plimmerton Farm PC18 & PC19

We note that PC18 and PC19 apply to the Operative District Plan, not the PDP. There has been no indication of how the Plimmerton Farm Zone will fit into the new DP. There was extensive consultation on this Plan Change through a streamlined planning process with a final decision by the Minister for the Environment on the framework under which such a development could proceed. We note a key part of the approval was the protection of significant environmental values, including Taupō Swamp and catchment, and we would be very concerned if there was any degradation of this protection resulting from any DP variation. We ask that the Plimmerton Farm Zone be considered a special case that has already been agreed and is underway, and should therefore stand as previously determined. The proposed increase in this development zone south of Pukerua Bay is also

likely to impact the Taupō Swamp and catchment, and we ask that environmental protection similar to that of PC18 be incorporated into any further rezoning.

In regard to the PC19 intensification of Plimmerton Farm Zone, we have concerns regarding the suitability of land designated for the High Density Sub Precinct in Precinct A. Much of the flat land on this site is subject to flooding, and the steep hill side up to Mo Street is unstable, as evidenced by a major slip event this year. Significant earthworks in this area could impact adversely on existing properties both above and below the site.

Feedback from Residents

We have solicited feedback from our community via our newsletter list and Facebook, and have actively encouraged residents to make submissions.

As expected there has been a range of views on this topic. This submission reflects the views of the majority of the feedback received from our community to date.

In closing

We are asking PCC to consider the points made in this submission and reconsider the HRZ zoning decisions in Plimmerton and Camborne. We also invite any parties to the planning process to join us in Plimmerton/Camborne for a walkabout to enhance their understanding of our comments “in situ”.

We also encourage PCC to look broadly at the overall impacts of both in-fill and greenfields intensification on existing services and facilities, for example, transport planning in line with population growth, infrastructure renewal and development, access to local business areas, provision of schools and recreation areas, and protection for the environment.

We hope the overall objectives of the city’s Growth Strategy are not lost in the push for intensification, and urge council to keep alive the big picture of Porirua as a liveable, vibrant city serving its residents and communities well into the future.