

Porirua's Proposed District Plan 2020

Submission on Porirua's Proposed District Plan

To - Environment and City Planning Team

Date received 20/11/2020

Submission Reference Number #56

Wishes to be heard? No

Is willing to present a joint case? No

Could gain an advantage in trade competition in making this submission? No

Directly affected by an effect of the subject matter of the submission? Yes

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Submission points

Point 56.1

Support / Support in part / Oppose

Oppose

Section: NH - Natural Hazards

Sub-section: Rules

Provision

NH-R8	Any Hazard-Sensitive Activity and Potentially-Hazard-Sensitive Activity and associated buildings within the High Hazard Areas in a Natural Hazard Overlay
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Submission

TJL Associates opposes the statements in the introduction of the Natural Hazard chapter and the corresponding policy (NH-P2) and rule (NH-R8) that are based on the presumption that the consequences from natural hazards cant be appropriately mitigated and therefore, for Hazard-Sensitive Activities or Potentially Hazard-Sensitive Activities within High Hazard Areas, the only option available is to avoid new development in these areas.

TJL considers this 'avoidance' framework is not appropriate given that, in relation to fault rupture in particular, geotechnical and structural engineering solutions can reduce / mitigate the effects of fault rupture to an acceptable. Full avoidance of development in the fault rupture zone will render the majority of the CBD unavailable for redevelopment.

Relief sought

TJL seeks that Council redraft these provisions to provide an appropriate consenting pathway, that seeks to reduce the risk of hazards instead of avoid it altogether. This is consistent with Objective 19 of the Regional Policy Statement for the Wellington Region -

The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and

climate change effects are reduced

And Policy 29 that doesn't avoid all subdivision and development in areas at high risk from natural hazards, but rather avoids inappropriate subdivision and development.

Point 56.2

Support / Support in part / Oppose

Oppose

Section: NH - Natural Hazards

Sub-section: NH - Natural Hazards

Provision

Within the High Hazard Areas of the Natural Hazard Overlay, it is unlikely the consequences from natural hazards can be appropriately mitigated, and therefore the only option available is to avoid new development in these areas.

Submission

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And Policy 29 that doesn't avoid all subdivision and development in areas at high risk from natural hazards, but rather avoids inappropriate subdivision and development.

Point 56.3

Support / Support in part / Oppose

Support

Section: CCZ - City Centre Zone

Sub-section: Standards

Provision

1. All buildings and structures must not exceed a maximum height above ground level of 30m. There are no matters of discretion for this standard.

Submission

TJL Associates supports the proposed maximum height provision of 30 metres in the City Centre Zone and seeks that this be retained. The increase in height from the current limits will provide significant development and redevelopment commercial opportunities within the CBD.

Relief sought

Retain provision as notified

Point 56.4

Support / Support in part / Oppose

Oppose

Section: NH - Natural Hazards

Sub-section: Policies

Provision

NH-P2 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas

Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the High Hazard Areas of the Natural Hazard Overlay unless it can be demonstrated that:

1. The activity has a critical operational need and functional need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option;
2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing; and building damage is avoided;
3. People can safely evacuate the property during a natural hazard event; and
4. The risk to the activity and surrounding properties is either avoided, or is low due to site-specific factors, and/or the scale, location and design of the activity.

Submission

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