

RMA FORM 5

## Submission on publicly notified Proposed

## Porirua District Plan

Clause 6 of the First Schedule, Resource Management Act 1991



To: Porirua City Council

1. Submitter details:

Full Name	Last <b>Shaw</b>	First <b>Tony</b>
Company/Organisation <i>if applicable</i>	<b>Paremata Residents Association</b>	
Contact Person <i>if different</i>		
Email Address for Service	<b>Tony.shaw@xtra.co.nz</b>	
Address	<b>31 Kahu Road, Paremata</b>	
	City Porirua	Postcode 5024
Address for Service <i>if different</i>	<i>Postal Address</i>	
	<i>Courier Address</i>	
Phone	<i>Mobile</i>	<i>Home</i>
	<b>0275755789</b>	
		<i>Work</i>

2. This is a **submission** on the **Proposed District Plan** for Porirua.

3. I could  I could not   
gain an advantage in trade competition through this submission.  
(Please tick relevant box)

If **you could** gain an advantage in trade competition through this submission please complete point four below:

4. I am  I am not   
directly affected by an effect of the subject matter of the submission that:  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.  
(Please tick relevant box if applicable)

Note:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

5. I wish  I do not wish   
 To be heard in support of my submission  
 (Please tick relevant box)

6. I will  I will not   
 Consider presenting a joint case with other submitters, who make a similar submission, at a hearing.  
 (Please tick relevant box)

Please complete section below (insert additional boxes per provision you are submitting on):

<p><b>The specific provision of the proposal that my submission relates to:</b></p> <p><b>Proposed Mixed Use Zone at the South Western End of Mana Esplanade</b></p> <p><b>MUZ- P1: Appropriate Activities</b>                  Enable activities that are consistent with the purpose, character and amenity values of the Mixed Use Zone, which provides for a large variety of compatible activities</p> <p><b>MUZ – R17: Light industrial activity</b>                  Restricted Discretionary – where the gross floor area of the activity is less than 3,500m<sup>2</sup></p>
<p><b>Do you: Support? Oppose? Amend?</b></p> <p><b>Oppose</b></p>
<p><b>What decision are you seeking from Council?</b>  <b>What action would you like: Retain? Amend? Add? Delete?</b></p> <p><b>Amend</b>                  We submit that the area should be designated as a <b>Local Centre Zone</b>.                  Any compatible Light Industrial Activity should not exceed <b>1,500m<sup>2</sup> gross floor area</b></p>
<p><b>Reasons:</b></p> <p>The Association <u>does not agree</u> that change to Mixed Use Zone is appropriate for the area at the south-western end of the Esplanade. Activities in this area service community and commercial needs, such as a fitness centre, childcare, food and beverage, realty services, retail and office space. This fits comfortably within the definition of Local Centre Zone and the area is complementary to the proposed Local Centre Zone further north on Mana Esplanade.</p> <p>We are also concerned that rule MUZ – R17 allowing <b>light industrial activity of the scale proposed</b>, is totally inappropriate for this location. Whilst the PDP makes light industrial activity restricted discretionary, the proposed floor area up to <u>3,500 square metres</u> is excessive for this site. Such a large footprint would be totally out of scale and would dominate other much smaller activities existing and permitted in the zone. In addition, it is highly unlikely that any objectionable odour, fumes, dust and noise, and any visual impacts could be avoided or satisfactorily mitigated for an activity of that size. The impact on existing residential units and childcare facilities would be unacceptable.</p>

<b>The specific provision of the proposal that my submission relates to:</b>
<p><b>Proposed Medium Density Residential Zone for Mana Esplanade</b></p> <p><b>MRZ- O2: Character and amenity values of the Medium Density Residential Zone</b>          The scale, form and density of use and development in the Medium Density Residential Zone is characterised by:</p> <p>4. Good quality amenity for adjoining sites; and          5. An urban environment that is visually attractive, safe, easy to navigate and convenient to access</p> <p><b>NH01 – Risk from Natural Hazards</b>          Subdivision use and development in the Natural Hazard Overlay do not significantly increase the risk to life or property and do not reduce the ability of communities to recover from a natural hazard event</p>
<b>Do you: Support? Oppose? Amend?</b>
<b>Oppose</b>
<p><b>What decision are you seeking from Council?</b>  <b>What action would you like: Retain? Amend? Add? Delete?</b></p>
<p><b>Amend</b>  <b>The Association believes that the residential area of Mana Esplanade should be changed to a General Residential Zone</b></p> <p><b>The Association strongly encourages PCC to decline any new multi-unit building applications in the Mana area until the sewer main is replaced and upgraded.</b></p> <p><b>The Association also encourages PCC to consider the road corridor that may be required in the future and take steps to ensure it can be achieved when necessary</b></p>
<b>Reasons:</b>
<p>Residential dwellings along Mana Esplanade consist of a wide variety of housing styles, apartments and motel accommodation. A significant number of the residential properties have been subdivided and there are a number of small businesses operating from private residences.</p> <p>We fully understand the need for more medium density development and respect the work done to identify suitable areas for such development. Some of our Executive Committee members believe that Mana would be suitable for medium density housing, however previous expressions of community feelings tell us that - after factors related to character and amenity are added to the criteria – this may not be the case. Based on a number of past community surveys and public meetings, we believe that most local residents (particularly those living within the proposed MRZ in Mana) would have difficulty in identifying more than a few properties where medium density development could be acceptable as a permitted activity.</p> <p>We believe that a change to MRZ for the residential areas of Mana Esplanade would be a mistake that would irretrievably change the village environment and compromise the community’s vision for the future functioning of this area. Three storey infill housing will not be compatible with the character and qualities of the area and will dominate adjacent sites and the ambiance of the Esplanade. We are very concerned that, over time, the current diversity and character of our existing communities will be lost.</p> <p>Unless a community has been specifically designed for higher density living, it is virtually inevitable that such a re-zoning will lead to reduced amenity values (sun, views, shading and privacy), increased noise levels, loss of character, less green space and increased run-off. In general terms we believe that medium density housing is more appropriate for greenfield and brownfield developments where there is the opportunity to do it well.</p>

The limited opportunities for in-fill medium density housing development on the Esplanade does not warrant the problems that will be created by re-zoning. In addition a report by the Property Group identifies that medium density residential development of Paremata and the Esplanade is not financially feasible.

### **Need for Public Transport**

One of the arguments put forward for MRZ zoning along Mana Esplanade is the closeness to Mana and Paremata train stations. This advantage is overstated, since the additional number of residents likely to take advantage of that closeness would be relatively small. Much greater benefit will be achieved by providing better bus services (frequency and routes) to/from train stations for surrounding communities, which will also reduce the need for car parking at train stations. Residents in most of the hill suburbs either don't have a public bus service or are too remote from it. Increased housing density in more remote suburbs would be more likely to make additional bus services a reality.

### **Resilience**

There are resilience issues that raise serious concerns over the suitability of the Esplanade and Paremata area for medium density housing or further commercial development, including sea level rise and coastal inundation, foreshore erosion, tsunamis, and of course earthquake and liquefaction.

Residential dwellings in the south-eastern end of the Esplanade lie within (or adjacent to) the earthquake exclusion zone of the Ohariu Fault. Also dwellings from Paremata Bridge up to Pascoe Avenue lie within the future coastal inundation zone and are likely to be affected by sea level rise. The Esplanade is low lying and open to sea storm surge and possible tsunami events.

There are many reasons why medium density residential buildings are not suitable for much of the Esplanade or along Paremata Crescent. While it is possible to achieve some protection from natural events, the additional cost of building may be uneconomic when compared with more suitable locations.

### **Waste Water & Storm Water Infrastructure**

The current sewerage and storm water infrastructure is already at capacity. It is essential that the sewer and storm water infrastructure are renewed and upgraded for current use and must not be expected to cope with additional discharges from more intense residential or commercial development.

Many pipes and pumping stations are near to sea level, increasing the possibility of groundwater and seawater infiltration. There is major inflow of storm water into the sewers in heavy rain, resulting in surcharging of manholes and discharge of dilute sewage onto the road and into the harbour. Flooding has occurred in parts of the Esplanade and Paremata Crescent (particularly around Paremata School, where toilets have been rendered unusable).

### **Future Roding Needs**

It is expected that one lane in each direction along Mana Esplanade will be sufficient once TGM is operating. However, there are concerns that the proposed development of Plimmerton Farm and other areas north of Plimmerton, together with normal traffic increase, means that four lanes may be required through Mana at some time in the future. We believe that allowing for this possibility would be prudent and should be provided for in the current zoning proposal.

As the present corridor has always been too narrow for a four lane road that is "fit for purpose", and tolerated by residents on a temporary basis until TGM is open, PCC should be looking ahead at the possible future need to purchase land from properties along the Esplanade. This factor alone is a strong argument against introducing an MRZ along Mana Esplanade at this stage.

### **Impact of NPS-UD**

We note that, due to the August 20 release of the new national policy statement for urban

development (NPS-UD), the PDP is based on the 2016 NPS-UDC and does not give effect to the new NPS. This means the PDP will need to change or a plan change will be required to give it effect by August 22.

While the Association believes medium density residential under the PDP is inappropriate for Mana Esplanade, six storey and above residential units over a wider area, as envisaged by NPS-UD is totally unacceptable. This may be appropriate for the CBD, but would be totally out of scale for Paremata and Mana Esplanade, and not what is envisaged by the local community. Being close to transport routes is not by itself a reason to destroy the character and amenity of a residential area. It will be very important to understand what qualifying matters are intended by PCC to avoid such a drastic change.

**The specific provision of the proposal that my submission relates to:**

**Proposed Local Centre Zone at the North-Western area of Mana Esplanade**

**LCZ- P1: Appropriate Activities**

Enable activities that are compatible with the purpose, character and amenity values of the Local Centre Zone and:

1. Service the needs of the surrounding residential catchment; and
2. Minimise any adverse effects on the use and amenity of adjoining sites in Residential Zones and Open and Recreation Zones

**Do you: Support? Oppose? Amend?**

**Support – with specific reservations**

**What decision are you seeking from Council?**

**What action would you like: Retain? Amend? Add? Delete?**

**Amend**

PCC needs to find some means to enable the BP site on Mana Esplanade to be treated as a special case in the event that BP ever proposes to sell the site or change its use.

PCC should give priority to discussing possible options with Z Energy to ensure the views from the north end of their site between McDonalds restaurant and Goat Point are retained into the future.

**Reasons:**

The Paremata community has previously expressed concerns about commercial expansion and its potential for adverse effects on the residential character of the Mana area. We believe those concerns are still valid and we see no real demand or compelling reasons to provide for further expansion. If there were any future demand, it would probably be preferable for it to be directed initially towards the CBD.

The fact that there are already so many “home-based” businesses and motels in the area suggests that it is already easy enough to obtain consent, so no rezoning for such businesses would seem necessary.

The Association accepts that Local Centre Zone is probably the most appropriate zoning for the existing Mana commercial area, although we are not convinced that allowing buildings up to 12 or 13 metres in height is necessary or acceptable – the existing heights appear adequate and have less adverse impacts on the neighbourhood.

**BP Site**

We note that the BP site is proposed to be zoned as LCZ, but this site should be treated as a special case if it is sold or has a change of use. This would recognize the fact that BP only received approval to

use the site for commercial purposes after making a number of concessions relating to operating hours, lighting, size of buildings and putting aside surplus land as green areas. It would not be appropriate to allow other commercial development on that site without taking the reasons for those concessions into account.

**Undeveloped Land North of Z Energy/McDonalds Restaurant**

The undeveloped triangular area of land between the McDonalds Restaurant carpark and Goat Point has to date provided an extremely valuable view-shaft out to the north and west. This has treated passing motorists and pedestrian/cyclists to magnificent views taking in Mana Island and Whitirea Park, different water-based activities, outstanding sunsets, etc. With trees now starting to block these views and with the existing highway reverting next year to essentially a local road and tourist route, it is important that this area of land is protected from development, allowing vehicles (including vehicles parked on the roadside) to enjoy the views from around Goat Point.

**The specific provision of the proposal that my submission relates to:**

**Coastal Environment**

**CE – P5: Restoring and rehabilitating activities within the coastal environment**

Enable activities that restore and rehabilitate the coastal environment including Te Awarua-o-Porirua Harbour and its margins, and activities which maintain or enhance the amenity, recreational, ecological and cultural values of the coastal environment.

**Do you: Support? Oppose? Amend?**

**Support**

**What decision are you seeking from Council?**

**What action would you like: Retain? Amend? Add? Delete?**

**Add**

The Association believes the District Plan should be more proactive in supporting the removal of legislative barriers and adopt policies that will enable both the ecological and recreational values of the harbour to be enhanced.

**Reasons:**

The Paremata Residents Association would like to see policies and measures within the District Plan that increase the urgency to actively protect the useful life of the harbour. Current measures to reduce sedimentation are currently focused on trying to prevent sediment from getting into the harbour by, for instance, revegetating erosion prone rural land and revegetating stream banks. Despite these measures, sediment rates in the Pauatahanui inlet have visibly increased, to a significant extent from land development. Clearly the current measures are insufficient to entirely stop infilling of the harbour.

The District Plan needs to include measures that avoid tidal flow restrictions and improve the flushing ability of the inlet. If we want to avoid condemning the harbour to extinction as an active recreational asset, more positive steps to increase the flushing ability of the harbour and to physically remove sediment from the harbour are needed. Currently there are significant legislative barriers to achieving this, primarily the regional coastal policy statement and RMA that require time, high cost and risk in gaining consents to undertake any improvements in and around the harbour.

These legislative barriers will have to be overcome if we are to carry out any changes involving the harbour waters or foreshore. Proposals in the pipeline include erosion control at Dolly Varden, extension of the pathway around Pauatahanui Inlet, a cycle/walkway between Paremata and Porirua, removal of

tidal restrictions, possible relocation of launching ramps, etc. - there needs to be greater ability to carry out sensible improvements to enable more rational processing of the communities' wishes.

The harbour is often described as our Jewel in the Crown and water based activities have the potential to make Porirua a national and international destination city. The PDP includes a policy to encourage activities that will "rehabilitate and restore the amenity, recreational, ecological and cultural values" of the harbour. The ideal would be to put together an overall, long-term "development concept" for harbour edge and waterway improvements, and to agree on a common set of rules and guidelines with all the authorities involved. This would minimise the time-consuming and costly exercises required to obtain consents for every individual improvement around this valued asset.

Please return this form no later than **5pm on Friday 20 November 2020** to:

- Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY or
- email [dpreview@pcc.govt.nz](mailto:dpreview@pcc.govt.nz)

Signature of submitter  
(or person authorised  
to sign on behalf of  
submitter):

Date:  
19/11/2020

\_\_\_\_\_  
*A signature is not required if you  
make your submission by electronic  
means*

**Louise White**

---

**From:** Tony Shaw <tony.shaw@xtra.co.nz>  
**Sent:** Friday, 20 November 2020 2:06 PM  
**To:** dpreview  
**Subject:** [EXTERNAL] Paremata Residents Association Submission on the Proposed District Plan  
**Attachments:** Paremata Residents Association Submission on PDP.pdf

**Categories:** Submission on PDP

Please find attached a PDF copy of the submission on the Porirua Proposed District Plan on behalf of the Paremata Residents Association. The Association appreciates the opportunity to provide this submission.

The Paremata Residents Association continues to have major concerns over the impact of the Proposed District Plan (PDP) on our area. Many of these concerns were raised previously in our submission on the draft District Plan, but it is disappointing to note that only minor changes have been made in the PDP to address these important concerns. We believe that most of the concerns are still relevant and, where appropriate, we repeat them in our submission. Our concerns relate to the following:

- The intention to rezone relatively extensive areas of Paremata and Mana from existing Suburban Zone to Medium Density Residential Zone
- The intention to rezone the south-western end of Mana Esplanade to Mixed Use Zone
- Ensuring the triangular area north of Z Energy/McDonalds to Goat Point remains undeveloped

Our submission provides detail on why these proposed changes are not supported and identifies alternative solutions.

The Association does, however support actions to reduce siltation of Te Awarua-o-Porirua Harbour and to maintain its active recreational values. We would like to see specific actions in the PDP, particularly on the legislative barriers that are preventing the aim being achieved.

Regards  
Tony Shaw  
President, Paremata Residents Association