



## RMA Form 6

### Further submission – Proposed Porirua District Plan

*Clause 8 of First Schedule, Resource Management Act 1991*

**To:** Porirua City Council  
**Email to:** [dpreview@porirua.govt.nz](mailto:dpreview@porirua.govt.nz)  
**Subject:** Further submission - PDP  
**Post:** Proposed District Plan,  
 Environment and City Planning,  
 Porirua City Council,  
 PO Box 50-218,  
 PORIRUA CITY  
**Delivery:** Ground Floor, Council Administration Building, Cobham Court, Porirua City, marked "Attention:  
 Proposed District Plan, Environment and City Planning"

**Closing date for further submissions is 5pm Tuesday, 11 May 2021**

Submissions, a summary of decisions requested and submitter contact details can be viewed at:  
[www.porirua.govt.nz/proposeddistrictplan](http://www.porirua.govt.nz/proposeddistrictplan)

Further Submitter Contact Details			
Full Name  <b>Michael Peter Jebson</b>	<i>Last Name</i>		<i>First Name</i>
	<b>Jebson</b>		<b>Michael (Mike)</b>
	<i>[insert additional rows if needed]</i>		
Or Company/Organisation Name <i>if applicable</i>	n/a		
Contact Person <i>if different</i>	n/a		
Email Address for Service	<b>mpjebson@gmail.com</b>		
Address	<b>3 Gray Street</b>		
	<b>Pukerua Bay</b>		
	<b>Porirua</b>	<b>5026</b>	
Mail Address for Service <i>if different</i>	Same as above		
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
	<b>021 499 759</b>	<b>same</b>	<b>same</b>

**Attendance and wish to be heard at the hearing:**  
*you must fill in both rows below*

I do not wish       I wish

**To be heard in support of my further submission**  
*(Please tick relevant box)*

I will       I will not

**consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.**  
*(Please tick relevant box)*

**Relevance - you must select one box that applies to you:**

- I am a person representing a relevant aspect of the public interest
- I am a person who has an interest in the proposal that is greater than the interest the general public has
- I am the local authority for the relevant area

**Explain/specify the grounds for saying that you come within this category (you must fill this in):**

My wife Ann and I are the joint owners of our family home, located at 3 Gray Street, Pukerua Bay. Due to its location, our home (and all our surrounding neighbours' homes) would be directly impacted by the proposals contained in submission No. 81 from Kāinga Ora (KO) to establish a high-density residential zone (HDRZ) within 400m of Pukerua Bay Rail Station. (See the map on page 302 of KO's submission.)

Our property is directly south of Pukerua Bay Station and as such, is located within the proposed southern edge of the proposed HDRZ. It is at the top of the Bay and looks north down the central valley of the Bay and over the railway station out to sea. The proposed high-density zone would dominate the heart of Pukerua Bay and fundamentally negatively change the character of Pukerua Bay as a quiet, semi-rural coastal village.

**Note to person making further submission:**

*A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.*

*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):*

- *it is frivolous or vexatious;*
- *it discloses no reasonable or relevant case;*
- *it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;*
- *it contains offensive language;*
- *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.*

**Privacy note:**

*When a person or group makes a submission or further submission on the Proposed District Plan this is public information. Please note that by making a submission your personal details, including your name and addresses will be made publicly available under the Resource Management Act 1991. This is because, under the Act, any further submission supporting or opposing your submission must be forwarded to you as well as to PCC. There are limited circumstances when your submission or your contact details can be kept confidential. If you consider you have reasons*

*why your submission or your contact details should be kept confidential please contact the Environment & City Planning Team at [dpreview@porirua.govt.nz](mailto:dpreview@porirua.govt.nz).*

Signature of person making further submission  
(or person authorised to sign on behalf of  
person making further submission)

A handwritten signature in black ink, consisting of stylized initials followed by a long horizontal line.

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Date: **10 May 2021**

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

Your further submission:

Submitter Name/ Submission Number	Oppose	The particular parts of the submission I oppose are:	The reasons for my opposition are:	Allow or disallow	I seek that the whole submission be disallowed:
Kāinga Ora (KO) Submission 81	Oppose	<p><b>Kāinga Ora (KO)</b> has requested that certain areas of Porirua City (including the centre of the coastal village of Pukerua Bay within 400m of Pukerua Bay Rail Station) be rezoned as a High Density Residential Zone (HDRZ) as specified on pages 9 (paragraph 29), Attachment Two (pages 295 thru 301) and maps (pages 302 to 310) of its submission)</p> <p><b>Kāinga Ora</b> has in the balance of its 352 page submission also requested major and far reaching changes to the PCC-DP in addition to its proposal in regard the HDRZ. These changes appear to mainly focus on how to minimise costs of urban development to increase the availability and density of affordable housing. This is at the expense of wider factors that need to also be considered to ensure good urban design and to meet the wider objectives of the Resource Management Act and relevant national and regional policies.</p>	<p>I oppose the KO proposal to amend the Porirua City Council-District Plan (PCC-DP) to rezone my property at 3 Gray Street Pukerua Bay and the surrounding properties within 400m of Pukerua Bay Station as a high-density residential zone (HDRZ).</p> <p>I also oppose the broader impacts of the proposed changes to the district plan, as detailed in KO's submission, and seek that the whole of the KO submission relating to HDZs and urban intensification be disallowed.</p> <p>I am not opposed to greater urban intensification per se in Pukerua Bay, including the potential for low- and medium-density housing. I am opposed to poorly designed, one-dimensional zoning, based on a one-size-fits-all approach. A proposal based solely on the presence of a railway station hub, without proper consideration of the wider principles of good urban design and the extent to which other policy reasons for urban intensification would apply to Pukerua Bay, relative to other parts of Porirua City, is unlikely to contribute to a well-functioning urban environment.</p> <p><b>In summary, my opposition is because:</b> Both the KO provisions related to the imposition of HDRZ and its wider changes to support urban intensification outside the HDRZ appear to have been put forward without due consideration of:</p> <ul style="list-style-type: none"> <li>• relevant matters under the Act and the National Policy Statement – Urban Design (NPS-UD) including the potential of qualifying matters as envisioned by the NPS that may dictate a revised approach to the proposed zone;</li> <li>• local factors (other than the presence of a rail station) that impact on the suitability of Pukerua Bay for high-density residential development;</li> <li>• how principles of good urban design apply to the intensification of Porirua City.</li> </ul> <p>The changes as proposed by KO have the potential to profoundly change the character of Pukerua Bay and negatively impact its community. These changes need considerably more scrutiny to ensure these proposals:</p> <ul style="list-style-type: none"> <li>• satisfy the purposes and objectives of the RMA and other national instruments, including, but not limited to the NPS-UD;</li> <li>• are consistent with all relevant policies contained in the Wellington Regional Policy Statement;</li> <li>• help achieve the purpose of the Act by sustaining and enhancing the overall economic, social, environmental, and cultural wellbeing of residents of Porirua City and the current and future residents of Pukerua Bay in particular.</li> </ul> <p>Any further consideration of these changes should be as part of a standalone and fully consulted plan change process in 2022, dedicated to this issue. It should not be rushed through at the last minute as part of the current PCC-DP, as there has not been sufficient opportunity for proper scrutiny by the effected communities, iwi. or the Council itself. A dedicated plan would allow the opportunity for proper consideration of the proposed changes by the Council, Ngāti Toa, and other interested parties, including KO and the various communities that will be directly affected, both in Pukerua Bay and in other parts of Porirua.</p> <p>This would still allow time for Porirua City to meet the statutory timeframes required by the NPS-UD ,which requires Tier One councils, including Porirua City to give effect to the NPS by July 2022.</p> <p>The reasons for my opposition are provided in more detail on the next page.</p>	Disallow	<p>I request that the whole submission from Kāinga Ora be disallowed.</p> <p>This is on the basis that the KO proposals are so significant in regards the future social, economic, cultural, and environmental wellbeing of the many communities that make up the city of Porirua, including Pukerua Bay, that it would be more appropriate for these proposed changes to be given proper consideration, including widespread consultation, through a separate and dedicated plan change process.</p>

**Your further submission:**

Submitter Name/ Submission Number	Oppose	The particular parts of the submission I oppose are:	The reasons for my opposition are:	Allow or disallow	I seek that the whole submission be disallowed:
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**Continued: The reasons for my opposition to KO's submission are:**

I, and all residents of Pukerua Bay, will be directly impacted by the adoption of Kāinga Ora's (KO's) submission in regards the proposed HDRZ. I am opposed to poorly designed, one-dimensional zoning, based on a one-size-fits-all approach. A proposal based solely on the presence of a railway station hub, without proper consideration of the wider principles of good urban design and the extent to which other policy reasons for urban intensification would apply to Pukerua Bay.

I note that KO's statutory objective requires it to contribute to sustainable, inclusive, and thriving communities and that, amongst other things, this includes sustaining or enhancing the overall economic, social, environmental, and cultural well-being of current and future generations. I also note that its submission purports to support the strategic vision of the Wellington Regional Policy Statement ("RPS") and is informed by the National Policy Statement on Urban Development ("NPS-UD") 2020, which provides direction around where growth should be located (that is, within proximity to transport hubs, urban centers, jobs, education, amenities, and services).

The Ministry for the Environment's guidance to councils in regards 'Understanding and Implementing the Intensification provisions for the NPS-UD' states that "applying the intensification requirements should also take into account the other objectives, policies and requirements of the NPS-UD. In particular, intensification outcomes need to contribute to well-functioning urban environments (as described in Policy 1 of the NPS-UD)"

It is apparent to me in my review of KO's 352-page submission that it has taken a crude one-size -fits-all one-dimensional approach to the application of the development of urban intensification zones under the National Policy Statement – Urban Development (NPS-UD) and the Wellington RPS without due consideration of:

- local conditions at Pukerua Bay (proximity to urban centers, jobs, education, amenities and services); or
- potential qualifying matters (as provided for under the NPSUD) that might dictate a more tailored application of the NPS UD directives with regard to urban intensification to Porirua city and particularly areas on the fringe of the city, like Pukerua Bay.

What is warranted is instead a multifactorial analysis to identify the most suitable urban areas in Porirua City for high-density housing to ensure well-functioning urban environments.

**Why a high-density urban zone is unlikely to be appropriate in Pukerua Bay and, at the very least, needs further consideration!**

Pukerua Bay is a sleepy coastal village on the northern fringe of Porirua city, with a central heart around its rail station dominated by low intensity housing and significant areas of natural vegetation at its center next to its railway station. The Bay has few amenities itself, with the nearest high school 13 kms away and just a few small shops (a small dairy, secondhand book shop, beauty spa, and hairdresser). There are no supermarkets or entertainment facilities. Employment opportunities are severely limited, and most residents in employment must travel to other centres. There is no doctor or pharmacy, the nearest of either being 6.5 km from the proposed zone. In respect to services, while Pukerua Bay has the essential services of the three waters and electricity, it must be noted that residential intensification would put a strain on water supply and sewage disposal. In both those matters, Pukerua Bay is at the end of the line for these city services. A major increase in the Bays population is likely to require costly upgrades to piping and pumping to meet the increased demand on water supply and sewage disposal. This means the cost of servicing high-density zones is likely to be significantly lower in other parts of the city than in Pukerua Bay.

It appears the sole key principle the submitter, Kāinga Ora, has applied in determining the HDRZ (page 16, paragraph 38) is a 400m proximity to a railway station, which it designates as a Rapid Transit Stop. While the Greater Wellington Regional Council has embarked on increasing rail transport capacity and the frequency of services on the Kapiti line, the resulting increased capacity and frequency terminates 7 kms south of Pukerua Bay at Plimmerton and does not extend to Pukerua Bay. While Pukerua Bay provides medium frequency public transport at best that is often compromised at weekends with buses often replacing trains. Ideally, urban intensification in the city should be close to high frequency public transport, employment opportunities, and urban facilities, not at the fringe of the city.

There has been no opportunity for either Porirua City or the local community to consider which qualifying matters under the NPS-UD would justify alternative building heights or densities around the rail station in the heart of Pukerua Bay.

The approach advocated by KO will substantially minimise costs to land developers and may support the achievement of low cost, (and potentially low-quality) high-rise housing that does not adhere to proper urban design disciplines and is out of character with the rest of the Bay. I would contend that such developments would be unlikely to achieve the wider purpose of the RMA or support the overall economic, social, environmental, and cultural well-being of current and future generations. This is due to KO's narrow focus on high-rise housing around all the rail hubs at the expense of good urban design and lack of consideration of local factors including consideration of 'qualifying matters' when considering the establishment of HDRZ.