

## 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>Danielle Marie Millar</b>	<i>Last Name</i>		<i>First Name</i>
	<b>Millar</b>		<b>Danielle</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>d.millar@hotmail.co.nz</b>		
Address	<b>66 Rawhiti Road</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>022 053 1031</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):**

I am the owner of my home in Rawhiti Road, Pukerua Bay. Due to its location, my home (and all of my surrounding neighbours' homes) would be directly impacted by the proposals contained in submission No. 81 from Kāinga Ora to establish a high-density residential zone within 400m of Pukerua Bay Rail Station. (See the map on page 302 of Kāinga Ora's submission.)

My property is on the northern outskirts of the high-density residential zone, proposed by Kāinga Ora. My home is down a quiet road, purchased because of the quiet, small coastal village character that Pukerua Bay offers. The proposed high-density residential zone would dominate the heart of Pukerua Bay and negatively impact the small, quiet coastal village character of Pukerua Bay.

**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)

**Danielle Millar**

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 Submission 81	Oppose	<p><b>Kāinga Ora</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 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 high-density residential zone. 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 Kāinga Ora proposal to amend the Porirua City Council-District Plan (PCC-DP) to rezone a large span of 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 Kāinga Ora’s submission, and seek that the whole of the Kāinga Ora submission relating to high-density residential zone and urban intensification be disallowed.</p> <p>The proposal is based solely on the presence of a railway station, without proper consideration of the proposed area such as the lack of amenities, reliability on a fragile train service and the impact to the already strained services.</p> <p><b>In summary, my opposition is because:</b></p> <p>The Kāinga Ora proposal for high-density residential zoning appears to be have been put forward without due consideration of:</p> <ul style="list-style-type: none"> <li>• local factors (other than the presence of a rail station) that impact 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 Kāinga Ora 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 will 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.</p> <p>Further consideration of these changes should be as part of a standalone and fully consulted plan change process in 2022, dedicated to the proposal of high-density residential zoning in Porirua City. This consultation should not be rushed as there has not been sufficient opportunity for proper scrutiny by the effected communities, iwi, or the Council itself.</p> <p>A dedicated plan would allow for proper consideration of the proposed changes by the effected communities, Ngāti Toa, the Council and other interested parties, including Kāinga Ora and the various communities that will be directly affected, both in Pukerua Bay and in other parts of Porirua.</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 Kāinga Ora 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 Kāinga Ora’s submission are:**

I, and all residents of Pukerua Bay, will be directly impacted by the adoption of Kāinga Ora’s submission in regards the proposed high-density residential zone. I am opposed to the seemingly rushed proposal based solely on the presence of a railway station, without proper consideration of suitability of the area for high-density residential housing, or how this would impact the small community of Pukerua Bay.

I note that Kāinga Ora’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).

It is apparent that Kāinga Ora has taken a one-size-fits-all 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 NPS-UD) 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 required, is a thorough analysis to identify the most suitable urban areas in Porirua City for high-density housing to ensure well-functioning urban environments.

**Why high-density urban housing is not appropriate in Pukerua Bay**

Pukerua Bay is a small coastal village on the northern outskirts of Porirua city, the community has very few amenities itself, with the nearest high school 13 kms away and just a handful of shops (a small dairy, secondhand book shop, beauty spa, and hairdresser). There are no supermarkets or entertainment facilities. Employment opportunities are practically non-existent, and most residents in employment must travel to other centres. There are no medical facilities nearby, the nearest doctor or pharmacy is 6.5km away 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 villages 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 Kāinga Ora’s proposal to make the hub of Pukerua Bay (400m proximity of the railway station) a high-density housing zone, is based purely on the location of the local train station, which is designated as a Rapid Transit Stop. While the Greater Wellington Regional Council has increased rail transport capacity and the frequency of services on the Kapiti line, the increased capacity and frequency terminates 7km 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 with replacement buses. Because of the remoteness of the area, relying on an unstable train service is near impossible without a private vehicle. To get to an area where employment is likely, such as Porirua City, this would take just under 3 hours to walk, or 45 minutes on a bicycle.

Ideally, urban intensification in the city should be close to high frequency public transport, employment opportunities, and urban facilities, not in a remote coastal village.

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 Kāinga Ora’s will substantially minimise costs to land developers and may support the achievement of low cost, low-quality, high-rise housing that is out of character with the rest of Pukerua Bay along with putting an increased strain on the already struggling services. 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 Kāinga Ora focusing on increasing high-density housing around all railway stations, at the expense of good urban design with lack of consideration of local factors or proper consultation with the impacted communities.