

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
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

Further Submitter Contact Details			
Full Name	Last Name		First Name
	[insert additional rows if needed]		
Or Company/Organisation Name <i>if applicable</i>	Silverwood Corporation Limited		
Contact Person <i>if different</i>	Stephanie Blick – Scope Planning Limited		
Email Address for Service	stephanie@scopeplanning.co.nz		
Address	City		Postcode
Mail Address for Service <i>if different</i>			
Phone	Mobile	Home	Work
	021823753		
Attendance and wish to be heard at the hearing: <i>you must fill in both rows below</i>			
<input type="checkbox"/> I do not wish <input checked="" type="checkbox"/> I wish			
To be heard in support of my further submission <i>(Please tick relevant box)</i>			
<input checked="" type="checkbox"/> I will <input type="checkbox"/> I will not			
consider presenting a joint case with other submitters, who make a similar further submission, at a hearing. <i>(Please tick relevant box)</i>			

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):

Silverwood Corporation Limited is the landowner of a significant landholding that is subject to a submission to rezone to Future Urban Zone ("FUZ"). Accordingly, the FUZ provisions are of direct relevance to this land holding.

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.

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



(Stephanie Blick on behalf of SCL)

Date **11 May 2021**

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

Your further submission:

Please complete section below and insert additional rows per submission point or submitter if required by using the enter button
Delete examples provided and enter your own further submission points

Submitter Name/ Submission Number <i>[See submission contact list]</i>	Submitter Address/Email <i>[if provided]</i>	Support or Oppose <i>[Only choose support or oppose]</i>	The particular parts of the submission I support or oppose are: <i>[clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal]</i>	The reasons for my support or opposition are: <i>[give reasons]</i>	Allow or disallow <i>[Only choose allow or disallow]</i>	I seek that the whole or part (describe part) of the submission be allowed or disallowed: <i>[give precise details]</i>
Kāinga Ora – Homes and Communities 81.944	developmentplanning@hnzc.co.nz KWilliams@propertygroup.co.nz	Oppose	Submission point: Seeks that any staged release of Future Urban Zoned land for future residential use take into account and monitor the uptake of intensification within existing residential zones.	The NPS-UD together with Section 31(1)(aa) of the Resource Management Act provides a clear direction in providing for urban growth in a District Plan. In particular, Section 31(1)(aa) states that a territorial authority function is: <i>the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district.</i> Obligations under the NPS-UD include that Councils must provide “at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term”. Also, as detailed in the PCC Housing Development Summary, the number of new dwellings required in Porirua City by 2048 is currently modelled as being approximately 10,500 (a figure which has been used to inform the Council’s Long Term Plan work). When considering land availability, approximately 5,000 of the required dwellings over the period to 2048 are forecast to become located in existing urban areas with the balance being needed in greenfield sites.	Disallow	Disallow whole submission point.
Greater Wellington Regional Council 137.77	Fleur.Matthews@gw.govt.nz	Oppose	Submission point: Supports the inclusion of the Future Urban Zones. However, urban development should only occur in a Future Urban Zone if it can do so within any contaminant limits set by Greater Wellington as required by the NPS-FM, and if future discharges from the development can comply with conditions on relevant discharge consents held by Wellington Water. Greater Wellington intends to notify a Plan Change in 2022 to set urban water quantity and quality limits. Structure Plans should consider these matters [urban development should only occur in a Future Urban Zone if it can do so within any contaminant limits set by Greater Wellington as required by the NPS-FM, and if future discharges from the development can comply with conditions on relevant discharge consents held by Wellington Water], as well as being based on the principles of Water Sensitive Urban Design.	While SCL supports positive environmental outcomes being achieved as part of the development of sites within the Future Urban Zone, SCL believes that there is sufficient scope within the structure plan guidance included in Appendix 11 to require this information at the future plan change stage. Given different territorial authority and regional council functions under the Resource Management Act, the extent of incorporation of these matters is limited. Also, at the time of future plan change, an assessment will be required against the relevant provisions of the NPS-FM. Further, any WSUD devices would be subject to the requirements of the Freshwater NES and GWRC’s proposed Natural Resources Plan and would require specific geotechnical and ecological assessment at the detailed design stage.	Disallow	Disallow whole submission point.

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Royal Forest and Bird Protection Society 225.19	a.geary@forestanbird.org.nz	Oppose	Submission point: Acknowledges that the policy direction in the NPSUD is to provide for urban development. This is not to be provided at any cost. The adverse effects of development must be considered in undertaking all council functions and responsibilities, and in achieving the purpose of the Act. Porirua has highly significant and sensitive environments where development is not appropriate. It also has areas where development may be appropriate but not without considering the sensitivity of the location, including potential offsite and downstream effects. The plan appears to be very focused on providing for urban development to the point of exclusion of meeting Council's other responsibilities and functions under the RMA. The approach to overlays and zoning creates an avoidable conflict between the NPSUD direction for urban environments and the protection of significant natural areas. This is avoidable because where SNAs are identified and scheduled they can be included in "natural open space zone". This would make it clear that the area of land which contains the SNA is not (and nor is it intended to be) predominantly urban in character. Amend the Plan to take a similar approach [zoning SNA overlay as "natural open space zone"] for all overlays which provide for section 6(a), (b) and (c) matters, particularly within the future urban zone (FUZ).	SCL do not consider that it is necessary to provide a separate zone for SNAs as the PRP includes a suite of objectives, policies, rules, and standards apply to the SNA overlays. Also, the use of overlays for such features is consistent with the National Planning Standards.	Disallow	Disallow whole submission point.
Housing Action Porirua 67.2	redmarting@gmail.com	Oppose	Submission point: HO-03 Opposes the expansion of the urban area onto greenfield sites until the potential for increasing housing on brownfield sites has been reasonably exhausted.	This submission point is not consistent with local authorities' obligations under the NPS-UD. The NPS-UD together with Section 31(1)(aa) of the Resource Management Act provides a clear direction in providing for urban growth in a District Plan. In particular, Section 31(1)(aa) is: <i>the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district</i> Also, as detailed in the PCC Housing Development Summary, the number of new dwellings required in Porirua City by 2048 is currently modelled as being approximately 10,500 (a figure which has been used to inform the Council's Long Term Plan work). When considering land availability, approximately 5,000 of the required dwellings over the period to 2048 are forecast to become located in existing urban areas with the balance being needed in greenfield sites.	Disallow	Disallow whole submission point.

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Royal Forest and Bird Protection Society 225.89	a.geary@forestanbird.org.nz	Oppose	Submission point: HO-03 Clarify that housing opportunities (variety, density and future supply) needs to be provided within the environmental limits of the relevant areas.	While SCL supports positive environmental outcomes being achieved as part of development of sites within the Future Urban Zone, SCL believes that there is sufficient scope within the structure plan guidance included in Appendix 11 to require this information at the future plan change stage. Also, at the time of future plan change, an assessment will be required against the relevant provisions of the NPS-FM. Further, any future development will be subject to the PNRP that now includes requirements for WSUD.	Disallow	Disallow whole submission point.
The Neil Group Limited and Gray Family 241.16	bryce@landmatters.nz	Support	Submission point: SUB-04 If Council is going to continue with a FUZ the objectives and policies need to provide for flexibility for investment/funding options for landowners/developers. The objective should also reflect that services can be provided where the impact on current infrastructure can be minimized. Amend Objective SUB-04 to (or similar intent): <u>Subdivision within the Future Urban Zone to support investment and funding of new urban development including does not result in the fragmentation of sites that would compromise the potential of: 1. The Judgeford Hills and Northern Growth Areas of the Future Urban Zone to accommodate integrated services and primarily for residential urban development:</u>	Support for the reasons identified by Submitter.	Allow	Allow subject to allowing SCL's own submission point to include Silverwood in this objective.
John Carrad 231.16		Support	Submission point: SUB-04 If Council is going to continue with a FUZ the objectives and policies need to provide for flexibility for investment/funding options for landowners/developers. The objective should also reflect that services can be provided where the impact on current infrastructure can be minimized. Amend Objective SUB-04 to (or similar intent): <u>Subdivision within the Future Urban Zone to support investment and funding of new urban development including does not result in the fragmentation of sites that would compromise the potential of: 1. The Judgeford Hills and Northern Growth Areas of the Future Urban Zone to accommodate integrated services and primarily for residential urban development:</u>	Support for the reasons identified by Submitter.	Allow	Allow subject to allowing SCL's own submission point to include Silverwood in this objective.

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The Neil Group Limited and Gray Family 241.18	bryce@landmatters.nz	Support	Submission point: The policy has been formulated in a rigid manner and is can be improved through provision of flexibility. <u>Amend Policy SUB-P7 to (or similar intent):</u> <u>Avoid Manage subdivision within the Future Urban Zone so that may result in one or more of the following does not occur: 2. The need for significant upgrades, provisions or extensions to the reticulated wastewater, reticulated water supply or stormwater networks, or other infrastructure in advance of integrated urban development where that infrastructure is not otherwise provided for within the development and/or contributed to through fair funding;</u>	Support for the reasons identified by Submitter. The 'avoid' framework sets a high threshold, particularly when servicing constraints can be dealt with via a number of mechanisms including development contributions.	Allow	Allow whole submission point.
Te Rūnanga o Toa Rangatira 264.69	resourcemanagement@ngatitooa.iwi.nz	Support	Submission point: FUZ – General Te Rūnanga supports high quality, well planned developments and where and when identified should seek to reflect Tangata Whenua. Retain as notified subject to the following amendments: Include: Future urban zones should: Tangata whenua values, mātauranga, tikanga and their ability to actively practice kaitiakitanga are recognised and reflected. Cultural expertise to inform design not just provide cultural impact advice.	Support for the reasons outlined by the Submitter. Further, the proposed amendment is consistent with Policy 9 of the NPS-UD.	Allow	Allow whole submission point.
The Neil Group Limited and Gray Family 241.6	bryce@landmatters.nz	Support	Submission point: FUZ – General Generally opposes the restrictive nature of the planning provisions in the FUZ including the objectives, policies and rules. A key principle in policy FUZ-P1 is to ensure residential areas are serviced by existing or planned infrastructure. The Proposed District Plan does not provide for flexibility and private investment into servicing. The land can be effectively serviced according to Neil group Limited's infrastructure experts. That infrastructure report is attached to the submission. [Refer to original submission for supporting documents] The policy direction to require land owners to go through a second plan change process to enable urban expansion is inefficient and will 'sterilise' investment for growth and giving effect to the Growth Strategy.	SCL agrees that the FUZ provisions should be more flexible and include the possibility of consenting new residential development, as opposed to requiring a structure plan and plan change process. Sufficient information has been provided with the SCL application, confirming that the Silverwood site is suitable for residential development.	Allow	Allow whole submission point

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			Amend the FUZ provisions to provide for a more flexible approach to development including the possibility of consenting new residential areas (discretionary activity) and a more flexible approach under policy FUZ-P1.			
Pukerua Property Group Limited 242.4	bryce@landmatters.nz	Support	Submission point: FUZ – General Generally opposes the restrictive nature of the planning provisions in the FUZ including the objectives, policies, and rules. A key principle in policy FUZ-P1 is to ensure residential areas are serviced by existing or planned infrastructure. The District Plan does not provide for flexibility and private investment into servicing. The land can be effectively serviced according to Pukerua Property Group Limited’s infrastructure experts. The infrastructure report by Orogen is attached to the submission. [See original submission for supporting documents] The policy direction to require landowners to go through a second plan change process to enable urban expansion is inefficient and will ‘sterilise’ investment for growth and giving effect to the Growth Strategy. Amend or remove the FUZ provisions to provide for a more flexible approach to development including the possibility of consenting new residential areas (discretionary activity) and a more flexible approach under policy FUZ-P1.	SCL agrees that the FUZ provisions should be more flexible and include the possibility of consenting new residential development, as opposed to requiring a structure plan and plan change process. Sufficient information has been provided with the SCL application, confirming that the Silverwood site is suitable for residential development.	Allow	Allow whole submission point.
Jason Alder 232.11	bryce@landmatters.nz	Support	Submission point: FUZ – General The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side. Amend the objectives, policies and rules to provide a resource consenting path for urban development in the FUZ including.	SCL agrees that the FUZ provisions should be more flexible and include the possibility of consenting new residential development, as opposed to requiring a structure plan and plan change process. Sufficient information has been provided with the SCL application, confirming that the Silverwood site is suitable for residential development.	Allow	Allow whole submission point
Royal Forest and Bird Protection Society 225.212	a.geary@forestanbird.org.nz	Oppose	Submission point: FUZ – General SNAs overlays within the FUZ are not adequately recognised and provided for as important values within the zone. The SCHED7 SNA overlay areas should be zones as “natural open space” to better reflect their values. The FUZ zone also does not provide adequate direction for the identification of additional SEAs or for the maintenance of indigenous biodiversity	SCL notes that protection of SNA’s is not provided for within the zone provisions as there is a separate chapter outlining the applicable provisions that relate to the SNA overlay. This is the same for other overlays like the flood hazard areas. Changing the overlays to a zone is not consistent with the National Planning Standards and would offer no additional protection than protection already afforded under the overlay provisions.	Disallow	Disallow whole submission point

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			Rezone the SEA overlay areas within the FRZ as "Natural open space" and provide policy direction for their protection Amend the FUZ provisions to provide direction for the identification of additional SEAs or for the maintenance of indigenous biodiversity			
Queen Elizabeth the Second National Trust (QEII) 216.46	mlucas@qeii.org.nz	Oppose	Submission point: FUZ – General Supports the rationale behind inclusion of a Future Urban Zone as this will ensure a well-planned and structured approach to future urban development. Supports the considered approach to urban planning indicated by the inclusion of an FUZ. Believe the FUZ Chapter will lead to improved outcomes for urban development in Porirua provided that changes are made in the FUZ Chapter to align with protections sought elsewhere in our submission. Seeks amendments to align the Objectives, Policies, and Rules with amendments sought elsewhere. For example, to ensure adverse effects on ONFL are avoided, rather than just significant effects. Amend the FUZ Chapter Objectives, Policies, and Rules to align with amendments sought elsewhere in this submission.	While SCL supports positive environmental outcomes being achieved as part of overall development of sites within the Future Urban Zone, SCL believes that there is sufficient scope within the structure plan guidance included in Appendix 11 to ensure these outcomes are achieved.	Disallow	Disallow whole submission point.
John Cody 184.5 184.6	jrcody@xtra.co.nz	Oppose	Submission point: FUZ – General That PCC enable democratic decision making informed by local experience by including a small, intelligible set of rules in the District Plan that create a process that enables communities to respond to actual housing need, potential for improvement, and global, national and local priorities Seeks the requirement that any application for housing on a Future Urban Zone (FUZ) is supported by evidence that intensification is not an option Seeks revised criteria for economic 'feasibility' to reassess the scope for redevelopment using forward looking models for providing housing in FUZs and Future Regeneration Zones.	The Council has obligations under the NPS-UD to provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. This includes both existing and new urban areas.	Disallow	Disallow whole submission point.
The Neil Group Limited and Gray Family 241.22	bryce@landmatters.nz	Support	Submission point: FUZ-O1 The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on	Support for the reasons outlined by the submitter. Silverwood has been identified as another landholding that meets the FUZ criteria.	Allow	Allow whole submission point

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			<p>the land supply side.</p> <p>Amend the objective as follows:</p> <p>FUZ-01</p> <p>The Future Urban Zone allows ...</p> <p>1. The ... Northern Growth Area to accommodate integrated, serviced and primarily residential urban development;</p>			
<p>The Neil Group Limited and Gray Family</p> <p>241.23</p>	<p>bryce@landmatters.nz</p>	<p>Support</p>	<p>Submission point:</p> <p>FUZ-02</p> <p>The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>Amend the objective as follows:</p> <p>FUZ-02</p> <p>The Future Urban Zone supports appropriate rural use and development, and maintains the character and amenity values of the General Rural Zone until such time as it is rezoned or consented for urban purposes.</p>	<p>Support for the reasons outlined by the submitter. Moreover, through the PDP process sufficient information has been provided that confirms that the Silverwood and Landcorp sites are suitable for residential development. Therefore, any future development of this site should be able to be advanced via a consent process as opposed to a plan change.</p>	<p>Allow</p>	<p>Allow whole submission point.</p>
<p>Jason Alder</p> <p>232.13</p>	<p>bryce@landmatters.nz</p>	<p>Support</p>	<p>Submission point:</p> <p>FUZ-02</p> <p>The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>The Future Urban Zone supports appropriate rural use and development, and maintains the character and amenity values of the General Rural Zone until such time as it is rezoned or consented for urban purposes.</p> <p>FUZ-P1</p> <p>Identify areas for future urban development as the Future Urban Zone where these:</p> <p>1. Are of a size, scale and location which could accommodate comprehensive and integrated future development that:</p> <p>1. Is serviced by infrastructure or planned to be serviced by infrastructure in the Council's Long Term Plan or the effects on existing infrastructure can be mitigated through provision of new services within the development site;</p> <p>2. Is connected to or planned to be connected to the transportation network where the effects on the network are minor and/or can be mitigated.</p>	<p>Support for the reasons outlined by the submitter.</p>	<p>Allow</p>	<p>Allow whole submission point.</p>

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Transpower New Zealand Ltd 60.117	Pauline.whitney@boffemiskell.co.nz	Support	<p>Submission point:</p> <p>FUZ-03 Support Objective FUZ-03 which recognises the need for use and development within the Future Urban Zone to not compromise infrastructure. Supports amendments to clause 4. to ensure that in the addition to the provision of infrastructure, the operation, maintenance, upgrade or development of infrastructure is not compromised.</p> <p>Amend Objective FUZ-03 as follows:</p> <p>FUZ-03 Maintaining the development potential of the Future Urban Zone</p> <p>Use and development in the Future Urban Zone does not result in any of the following:</p> <ol style="list-style-type: none"> 1. Structures and buildings of a scale and form that will restrict or prevent future urban development; 2. The efficient and effective operation of the local and wider transport network being compromised; 3. The need for significant upgrades, provisions or extensions to the wastewater, water supply or stormwater networks, or any other infrastructure in advance of future urban development; 4. The efficient operation, maintenance, upgrade development or provision of infrastructure being compromised; 5. Reverse sensitivity effects when urban development occurs; 6. Reverse sensitivity effects on existing rural activities or infrastructure; or 7. The form or nature of future urban development being compromised. 	Support for the reasons outlined by the submitter.	Allow	Allow whole submission point.
Royal Forest and Bird Protection Society 225.213	a.geary@forestanbird.org.nz	Oppose	<p>Submission point:</p> <p>FUZ-P1 The policy suggests that FUZ areas will or have been identified where they will avoid significant adverse effects and avoid, remedy or mitigate any other adverse effects on the identified characteristics and values of any areas identified specified schedules including SCHED7 - Significant Natural Areas. Far from certain that effects will be significant adverse effects will be avoided and that other adverse will be avoided, remedied or mitigated given the provisions for specific activities in other chapters of the plan. For example ECO-P2 as proposed provides for offsets and compensation where adverse effects are not avoided.</p> <p>Amend the zoning of identified SNAs within the FUZ to "natural open space zone".</p> <p>Amend the policy direction in the FUZ to:</p> <ul style="list-style-type: none"> • avoid adverse effects on areas meeting the significance criteria in Policy 23 of the RPS; • maintain indigenous biodiversity; • include a setback from the natural open space zone; and • avoid adverse effects on SNAs from activities in the FUZ. 	SCL notes that protection of SNA's is not provided for within the zone provisions as there is a separate chapter outlining the applicable provisions that relate to the SNA overlay. This is the same for other overlays like the flood hazard areas. Changing the overlays to a zone is not consistent with the National Planning Standards and would offer no additional protection than protection already afforded under the overlay provisions.	Oppose	Oppose whole submission point

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Pukerua Property Group Limited 242.15	bryce@landmatters.n z	Support	<p>Submission point:</p> <p>FUZ-P1 The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>Amend the policy as follows:</p> <p>FUZ-P1</p> <p>Identify areas for future urban development as the Future Urban Zone where these:</p> <p>Are of a size, scale and location which could accommodate comprehensive and integrated future development that</p> <ol style="list-style-type: none"> 1. Is serviced by infrastructure or planned to be serviced by infrastructure in the Council's Long Term Plan <u>or the effects on existing infrastructure can be mitigated through provision of new services within the development site;</u> 2. Is connected to or planned to be connected to the transportation network <u>where the effects on the network are minor and/or can be mitigated.</u> 	Support for the reasons outlined by the Submitter.	Allow	Allow whole submission point
The Neil Group Limited and Gray Family	bryce@landmatters.n z	Support	<p>Submission point:</p> <p>FUZ-P1 The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>Amend the policy as follows:</p> <p>FUZ-P1</p> <p>Identify areas for future urban development as the Future Urban Zone where these:</p> <ol style="list-style-type: none"> 1. Are of a size, scale and location which could accommodate comprehensive and integrated future development that: 1. Is serviced by infrastructure or planned to be serviced by infrastructure in the Council's Long Term Plan <u>or the effects on existing infrastructure can be mitigated through provision of new services within the development site;</u> 2. Is connected to or planned to be connected to the transportation network <u>where the effects on the network are minor and/or can be mitigated.</u> 	Support for the reasons outlined by the submitter.	Allow	Allow whole submission point.

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Pukerua Property Group Limited 242.16	bryce@landmatters.nz	Support	<p>Submission point:</p> <p>FUZ-P2 The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Amend the policy as follows:</p> <p>FUZ-P2</p> <p>Only provide for urban development within a Future Urban Zone when:</p> <ol style="list-style-type: none"> 1. A comprehensive structure plan for the area has been developed in <u>general</u> accordance with the guidelines contained in APP11 – Future Urban Zone Structure Plan Guidance and adopted by Porirua City Council; and 2. The area has been rezoned <u>or consented</u> as a Development Area which enables urban development. </div>	Support for the reasons outlined by the submitter. Moreover, through the PDP process sufficient information has been provided that confirms that Silverwood and Landcorp sites are suitable for residential development. Therefore, any future development of this site should be achievable via a consent process as opposed to a plan change.	Allow	Allow whole submission point
Royal Forest and Bird Protection Society FUZ-P2	a.geary@forestanbird.org.nz	Oppose	<p>Submission point:</p> <p>FUZ-P2 While a structure plan is to be developed there is no certainty that this process (Appendix 11) will result in the protection of indigenous biodiversity that meets the criteria for significance in Policy 23 of the RPS. Separating the currently identified SNAs into a separate zone will avoid conflicting outcomes for development within the FUZ to areas where protection is required under s6 of the RMA. Supports the retention of the structure plan process to further identify environmental constraints within the FUZ and on adjacent areas and receiving environments within or beyond the FUZ. The policy is uncertain with respect to the direction for the area to be rezoned as a Development Area.</p> <p>If this rezoning has been undertaken then the FUZ policy would no longer apply. However it is not clear which rezone would apply to a Development Area. The General Approach section sets out that there are no current development areas in the Plan. The reference to rezoning may be in error given that the definition of a development area does not refer to a zone requirement.</p> <p>A direction to “provide for” urban development on this basis is uncertain.</p>	SCL notes that protection of SNA’s is not provided for within the zone provisions as there is a separate chapter outlining the applicable provisions that relate to the SNA overlay. This is the same for other overlays like the flood hazard areas. Also, irrespective of the underlying zone provisions, the SNA overlay provisions will always apply to these areas. Changing the overlays to a zone is not consistent with the National Planning Standards and would offer no additional protection than protection already afforded under the overlay provisions.	Disallow	Disallow whole submission point,

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			<p>Amend the zoning of identified SNAs within the FUZ to "natural open space zone".</p> <p>Amend the policy direction in the FUZ to:</p> <ul style="list-style-type: none"> • avoid adverse effects on areas meeting the significance criteria in Policy 23 of the RPS; • maintain indigenous biodiversity; • include a setback from the natural open space zone; and • avoid adverse effects on SNAs from activities in the FUZ. <p>Amend the FUZ-P2 by changing the words "Only provide for" to "Only considered providing for" and to clarify the rezoning requirement in clause 2.</p>			
<p>Greater Wellington Regional Council</p> <p>137.66</p>	<p>Fleur.Matthews@gw.govt.nz</p>	<p>Oppose</p>	<p>Submission point:</p> <p>FUZ-P2 Urban Development should only occur in a Future Urban Zone if it can do so within any contaminant limits set by Greater Wellington as required by the NPS-FM, and if future discharges from the development can comply with conditions on relevant discharge consents held by Wellington Water. Any Future Urban Zones will also need to meet the requirements of the National Environmental Standards for Freshwater, particularly wetland protection and reclamation provisions. Structure Plans should consider these matters, as well as being based on the principles of Water Sensitive Urban Design.</p> <p>Amend FUZ-P2 and APP-11 to take into account the National Environmental Standards for Freshwater, contaminant limits, conditions on discharge consents held by Wellington Water, and water sensitive urban design.</p>	<p>While SCL supports positive environmental outcomes being achieved as part of overall development of sites within the Future Urban Zone, SCL believes that there is sufficient scope within the structure plan included in Appendix 11 to require this information at the future plan change stage.</p> <p>Given different territorial authority and regional council functions under sections 30 and 31 of the Resource Management Act, the extent of incorporation of these matters outlined in the GWRC submission is limited.</p> <p>Also, at the time of the plan change, an assessment will be required against the relevant provisions of the NPS-FM. Further, any WSUD devices would be subject to the requirements of the Freshwater NES and GWRC's proposed Natural Resources Plan and would require specific geotechnical and ecological assessment at the detailed design stage.</p>	<p>Disallow</p>	<p>Disallow whole submission point.</p>
<p>Royal Forest and Bird Protection Society</p> <p>225.215</p>	<p>a.geary@forestanbird.org.nz</p>	<p>Oppose</p>	<p>Submission point:</p> <p>FUZ-P5 The policy provides direction for development on the basis of the purpose, character and amenity values on the FUZ. There is no objective or policy direction on what those character and values are.</p> <p>Recognize indigenous biodiversity as an important characteristic and value within FUZ and the relationship to adjacent SNAs and wetlands, including those within "natural open space zone" as sought above.</p>	<p>SCL notes that protection of SNA's is not provided for within the zone provisions as there is a separate chapter outlining the applicable provisions that relate to the SNA overlay. This is the same for other overlays like the flood hazard areas.</p> <p>Changing the overlays to a zone is not consistent with the National Planning Standards and would offer no additional protection than protection already afforded under the overlay provisions.</p>	<p>Disallow</p>	<p>Disallow whole submission point.</p>
<p>Greater Wellington Regional Council - Matthews, Fleur</p>	<p>Fleur.Matthews@gw.govt.nz</p>	<p>Oppose</p>	<p>Submission point:</p> <p>App11 – Future Urban Zone Structure Plan Guidance</p>	<p>While SCL supports positive environmental outcomes being achieved as part of overall development of sites within the Future Urban Zone, SCL believes that there is sufficient scope within the structure plan included in Appendix 11 to</p>	<p>Disallow</p>	<p>Disallow whole submission point.</p>

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137.88			<p>Urban Development should only occur in a Future Urban Zone if it can do so within any contaminant limits set by Greater Wellington as required by the NPS-FM, and if future discharges from the development can comply with conditions on relevant discharge consents held by Wellington Water. Any Future Urban Zones will also need to meet the requirements of the National Environmental Standards for Freshwater, particularly wetland protection and reclamation provisions. Structure Plans should consider these matters, as well as being based on the principles of Water Sensitive Urban Design.</p> <p>Amend FUZ-P2 and APP-11 to take into account the National Environmental Standards for Freshwater, contaminant limits, conditions on discharge consents held by Wellington Water, and water sensitive urban design.</p>	<p>require this information at the future plan change stage.</p> <p>Given different territorial authority and regional council functions under the Resource Management Act, the extent of incorporation of these matters is limited. The NES-FM relates to regional plans.</p> <p>Also, at the time of future plan change, an assessment will be required against the relevant provisions of the NPS-FM. Further, any WSUD devices would be subject to the requirements of the Freshwater NES and GWRC's proposed Natural Resources Plan and would require specific geotechnical and ecological assessment at the detailed design stage.</p>		
John Carrad 231.29	bryce@landmatters.co.nz	Support	<p>Submission point:</p> <p>App11 – Future Urban Zone Structure Plan Guidance</p> <p>The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>APP11 – Future Urban Zone Structure Plan Guidance</p> <p>Where applicable, relevant and appropriate a structure plan is to identify, investigate and address the matters set out below.</p>	<p>Support for the reasons outlined by the submitter. Moreover, through the PDP process sufficient information has been provided that confirms that Silverwood and Landcorp sites are suitable for residential development. Therefore, any future development of this site should be achievable via a consent process as opposed to a plan change.</p>	Allow	Allow whole submission point.
The Neil Group Limited and Gray Family 241.27	bryce@landmatters.co.nz	Support	<p>Submission point:</p> <p>App11 – Future Urban Zone Structure Plan Guidance</p> <p>The suite of provisions relating to the FUZ are essentially monopolizing future urban land supply to one area of the City. This approach does not provide appropriate market forces and choice on the land supply side.</p> <p>APP11 – Future Urban Zone Structure Plan Guidance</p> <p>Where applicable, relevant and appropriate a structure plan is to identify, investigate and address the matters set out below.</p>	<p>Support for the reasons outlined by the submitter. Moreover, through the PDP process sufficient information has been provided that confirms that the Silverwood and Landcorp sites are suitable for residential development. Therefore, any future development of this site should be achievable via a consent process as opposed to a plan change.</p>	Allow	Allow whole submission point.