

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	<i>Last</i> Ballinger	<i>First</i> Murray	
Company/Organisation <i>if applicable</i>	Ballinger Industries Limited		
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Phone	<i>Mobile</i> 0272208305	<i>Home</i>	<i>Work</i>

- 2. This is a **submission** on the **Proposed District Plan** for Porirua.
- 3. I could not gain an advantage in trade competition through this submission.

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

- 6. I will
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):

The specific provision of the proposal that my submission relates to:
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Mixed Use Zone

Specific Controls

Active Street Frontage - Primary Frontage Control

The imposition of a Specific Control in the form of an Active Street Frontage on the Kenepuru Drive boundary of the property known as 35 Kenepuru Drive (accessed from Peti Lane.) (Part lot 2 DP 48357 and Lot 2 DP 48404) The property is owned by Ballinger Industries Limited and is leased to two tenants, firstly a 10 Pin bowling and entertainment facility and secondly a contractor’s yard.

The Property 35 Kenepuru Drive is zoned “Industrial” under the Operative District Plan and is proposed in the PDP to be part of the Mixed Use Zone.

Do you: We wish to Amend?

Amend the PDP by deleting the Active Street Frontage line from the PDP Planning maps and any other part of the PDP that refers to the imposition of this Specific Control in the PDP on 35 Kenepuru Drive.

What decision are you seeking from Council?

What action would you like: Delete

Delete the Active Street Frontage line from the PDP Planning maps and any other part of the PDP that refers to the imposition of this Specific Control in the PDP on 35 Kenepuru Drive.

References to the “McIndoe Report” refer to;
https://porirua.govt.nz/documents/4080/McIndoe_Urban_2020_Urban_Design_Advice_on_Rules_and_Standards_-_Part_3.pdf (part attached)

Reasons:**Summary;**

The imposition of an Active Street Frontage Specific Control is not appropriate for the subject property as the topography of the site makes it impossible for the public to “engage” with the site from Kenepuru Drive. The imposition has been made contrary to the criteria set out in the “McIndoe Report part 3”. The site is not contiguous with any other Mixed Use Zone properties as it is separated by a large roundabout to the South and PCC reserve playing fields to the North.

A) Topography:

Refer to Aerial Map “A” below, the whole of the subject site is located at the bottom of a steep bank. The site road boundary and the active street frontage (shown as a red line) is at the bottom of the bank. Access to the site is via the newly created road called Peti Lane marked with red arrows. Peti Lane is to vest in PCC as part of the process of creating the new roundabout intersection of Transmission Gully expressway with Kenepuru Drive. No access direct from Kenepuru Drive is practical or available. PCC roading staff have confirmed that there are no plans to lower Kenepuru Drive to a level that would make the imposition of an Active Street Frontage on the subject property a practical proposition. The level of the roundabout dictates that Kenepuru Drive remain at the existing height in the vicinity. Refer to photos below showing the view from and towards the site at points A, B and C. It is clear that any compliance with the requirements imposed by the Active Street Frontage as set out in MUZ-P6 items 3 and 4 will be impractical as road and pedestrian traffic will not access the site from Kenepuru drive and would not be able to see into transparent glazing on the ground floor. The owner of the subject site will be forced to obtain a resource consent when applying for future Building Consents so as not to comply with the requirements of the Active Street Frontage Specific Control. A cost and time imposition that is not a good planning outcome.

B) McIndoe Report part 3. This report was commissioned by PCC to assess the potential extent of Active Street Frontages (ASF) within the Local Centre and Mixed Use Zones (LCZ and MUZ). The Report used 10 criteria to assess each zone and gave a score to each zone by rating each criterion between 1 and 5, with 5 being a low need for ASF and 1 a high need. The Kenepuru MUZ (which the subject premises form part of) scored 44 out of 50 which indicated a very low support for an ASF. (Refer to pages 4,5,11 and 12 of the report) The report

recommends on page 12 not to introduce ASF standards in the MUZ. PCC have not been able to advise why the report's recommendation was not accepted and incorporated in the PDP.

C) Had the subject site been assessed individually and not as part of the Kenepuru MUZ an even higher score would have resulted as follows.

Criteria	Score
1- Pedestrian oriented setting	5 as pedestrians are located on the footpath way above the site
2- Extended spatial pattern	5 the subject site is divorced from the rest of the nearby MUZ
3- Contiguous building frontage	5 the building on site is nowhere near any other buildings
4- Continuous active edge	5 the active edge is not continuous with other MUZ edges
5- Continuous sheltering edge	5 no shelter is available from the edge
6- Beneficial pedestrian linkage	5 no linkage exists due to the steep bank in road reserve
7- Coherent on-site open space	5 incoherent
8- Coherent public streetscape	5 incoherent
9- Positive residential interface	5 no residential interface exists
10- Clear place-based identity	5 not applicable
Total 50	

Clearly the subject site does not meet the set criteria for the imposition of an Active Street Frontage control.

D) The "PCC Mixed Use Zone Design Guide 21/7/2020" contains guidelines that will ensure any future buildings built on the subject site have interesting roof lines and upper floor details. The upper floor and roof design will be the aspect of any new building which is seen by passing traffic, pedestrians and retirement village residents living across Kenepuru Drive.

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



Signature of submitter
(or person authorised to sign

on behalf of submitter):

Director of Ballinger Industries Ltd

Date:
18/11/2020

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

Aerial "A"





View looking from
"A" towards
Kenepuru Drive



View from point "B" towards Kenepuru Drive



View from Kenepuru Drive
towards point "C"

View from
Kenepuru Drive
towards point "B"

Level 2 of the existing
building is just visible



View looking from
Kenepuru Drive
towards point "A"



VIEW NORTH FROM PETI LANE

Retirement village units that will benefit from good design but not active street frontage on level one



VIEW NORTH FROM PETI LANE
(PORIRUA STREAM ON RHS)





1 Local Centre and Mixed Use Zone Frontages


1.1 Analysis of potential for defined Active Street Frontages in the Local Centre and Mixed Use Zones (LCZ and MUZ)

(Urban Design Memo 7 of 17 February 2020)

Scope

PCC have requested that MUL assess the potential extent of 'Active Street Frontages' (ASFs) within nine Local Centre Zones (LCZs) and seven Mixed Use Zones (MUZs). Recognised ASFs could be protected through the introduction of a new District Plan standard. If adopted, a standard would define required building frontages in specific locations. Output from MUL's assessment is confirmed in this memo. The memo recommends including or not including a defined 'Active Street Frontage' in each LCZ and MUZ. These recommendations are accompanied by supporting rationales. Proposed ASFs are shown on cadastral plans in Maps 1-4.

Methodology

1. Overlay planned LCZs and MUZs on cadastral plans with building footprints.
2. Develop assessment criteria and associated recording template.
3. Conduct desktop review of cadastral plans and footprints (augmented by aerials).
4. Conduct field study of LCZs and MUZs. 
5. Formulate conclusions and recommendations.

Criteria for assessment

Extent to which a defined building frontage (existing or proposed) contributes to:

- contiguous building frontage across multiple adjoining sites;
- continuous active edge with significant visual interest;
- coherent and convenient pedestrian linkages between adjacent sites/activities;
- continuous shelter for pedestrians;
- coordinated pattern of on-site open spaces along street frontages;
- high-quality streetscape (including positive interface with residential areas); and
- clear formal/spatial identity for local centre or mixed-use destination.

Further characteristics that support defining specific building frontages:

- extended and persistent pattern of connected building frontages; and/or
- pedestrian-oriented environment with primary building access from pathways

Characteristics that support not defining specific building frontages:

- dispersed stand-alone buildings and/or variable setbacks; and/or
- vehicle-oriented environment with primary building access from roads/car parks

These criteria are summarised as ten attributes. The desktop review and field study gauge the strength of each attribute in a specific LCZ or MUZ:

1. Pedestrian oriented setting
2. Extended spatial pattern
3. Contiguous building frontage
4. Continuous active edge
5. Continuous sheltering edge
6. Beneficial pedestrian linkage
7. Coherent on-site open space
8. Coherent public streetscape
9. Positive residential interface
10. Clear place-based identity

Assessment was carried using a five-point scale. A score of “1” identifies the attribute as strongly evident (indicating strong support for an ASF according to this measure). A score of “5” identifies the attribute as weakly present (indicating weak support for an ASF according to this measure). All the attributes are equally weighted. However, if an attribute is irrelevant (e.g. Positive residential interface), no score is entered against this criterion and the aggregated score is adjusted to maintain parity with other assessments. A low aggregated score indicates strong overall support for ASF recognition, and a high aggregated score indicates weak overall support.

Observations

LCZs and MUZs have been ranked using aggregate scores from the assessment. Subsequently, the areas have been grouped based on key shared attributes:

GROUP A	Ranui Local Centre	13	} GROUP B
	Titahi Bay Local Centre	13	
	Plimmerton Local Centre	16	
	Cannons Creek Local Centre	19	
	Whitby Local Centre	21	
	Mana North Local Centre	28	
	Mana South Mixed Use	33	
	Waitangirua Local Centre	35	
GROUP C	Porirua City Centre Mixed Use (1)	36	
	Mana South Local Centre	38	
	Titahi Bay Mixed Use	38	
	Aotea Local Centre	41	
	Porirua City Centre Mixed Use (2)	43	
	Kenepuru Mixed Use	44	
	Waitangirua Mixed Use	47	
	Plimmerton Mixed Use	47	

Mana North Local Centre

Mana North Local Centre is the best example of a strip mall. Here, discrete commercial developments have created a series of loosely aligned frontages along Mana Esplanade. All buildings address the highway in some manner, e.g. with prominent entrances, large-scale signage or familiar corporate colour schemes. However, most frontages are located 10-30m from the public right-of-way. Few buildings are accessed directly from the esplanade. Instead, they are approached via side roads, car parks and an elaborate on-site circulation system.

Mana North's front setbacks vary in quality and character as well as depth. Some are utilitarian car parks, which make few concessions to pedestrian comfort. Others are landscaped forecourts with a sense of enclosure and one or more active frontages. Although it is possible to walk from one frontage to the next, the route is indirect and sometimes illegible. It is also interrupted by vehicle circulation.

As noted above, Mana North's retail premises are located within large privately owned lots, which are effectively land banks for more intensive land use. In this context, an ASF standard would impose an unnecessary constraint on future comprehensive redevelopment.

Mana South Mixed Use

Although Mana South is identified as a Mixed Use Zone, the area resembles a Local Centre and exhibits many of the same "strip mall" features as its larger neighbour, Mana North Local Centre. As at Mana North, an ASF standard is unhelpful as it could inhibit comprehensive redevelopment.

Waitangirua Local Centre

The other noteworthy member of Group B is Waitangirua Local Centre. Here, a row of outward-facing shops is the only functioning component of a failed shopping mall. Two anchor stores have closed, and access to the internal mall space is shuttered. The capacity of surrounding parking lots far exceeds present-day needs. Now, a single aisle of parking serves surviving businesses within the external "strip mall", and a public park occupies the site's Warspite Avenue frontage. Elsewhere the remaining expanse of asphalt calls attention to disuse and helps to isolate the retail complex from its surroundings.

In Waitangirua, existing retail accommodation is sub-optimal and results from a failed building type. It would be unhelpful to perpetuate this outcome, especially given the transformative effect of Waitangirua's new motorway connection. In this context, a District Plan standard is unnecessary and imposes a constraint on future comprehensive redevelopment.

GROUP C

Group C is the largest and most diverse of the three groups. It contains all but one of the MUZs. The exception is Mana South Mixed Use Zone, which closely resembles a Local Centre (see above). **All other MUZs occupy the lower half of the ranking table, indicating that there is little support for an ASF standard within this zone.**

Typically, Mixed Use areas contain stand-alone buildings in vehicle-oriented environments. Building entrances are often conspicuous. However, car parks mediate between public and private domains, and signage becomes the principal means for addressing passers-by. Uniform front setbacks are rare. If any visual cohesion exists, it

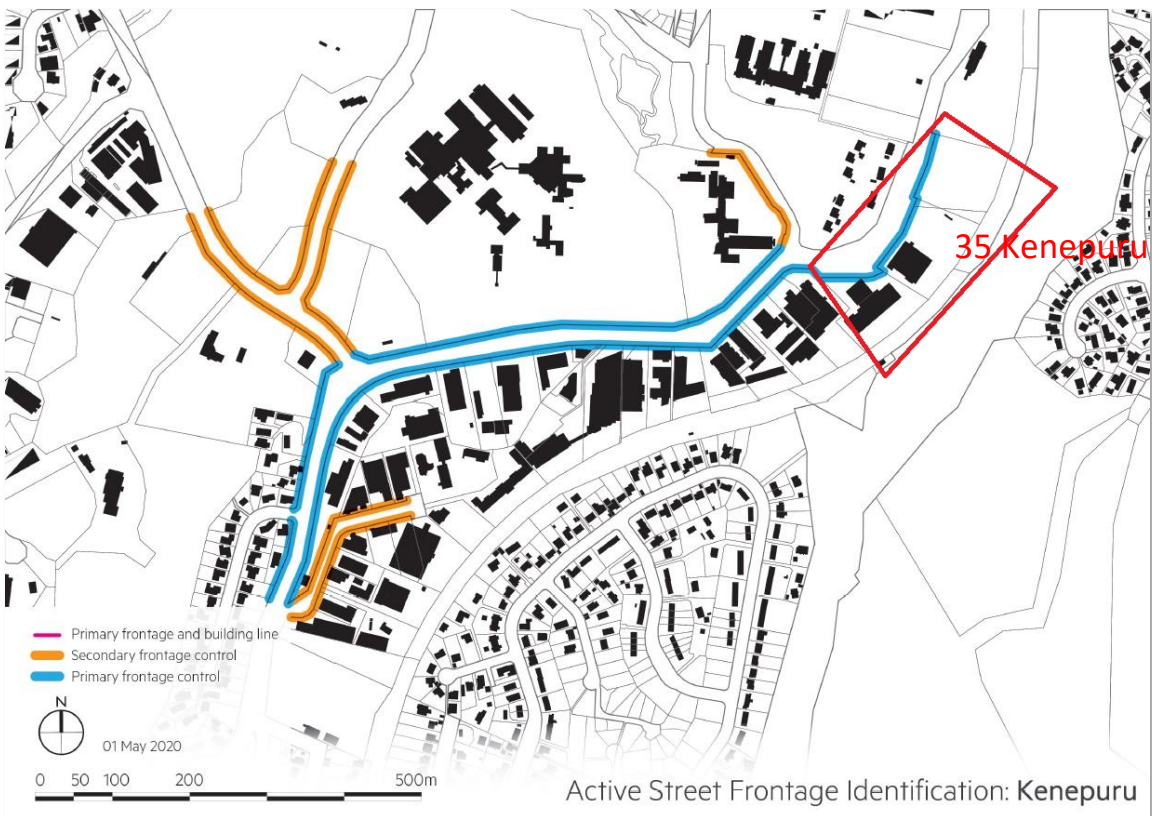
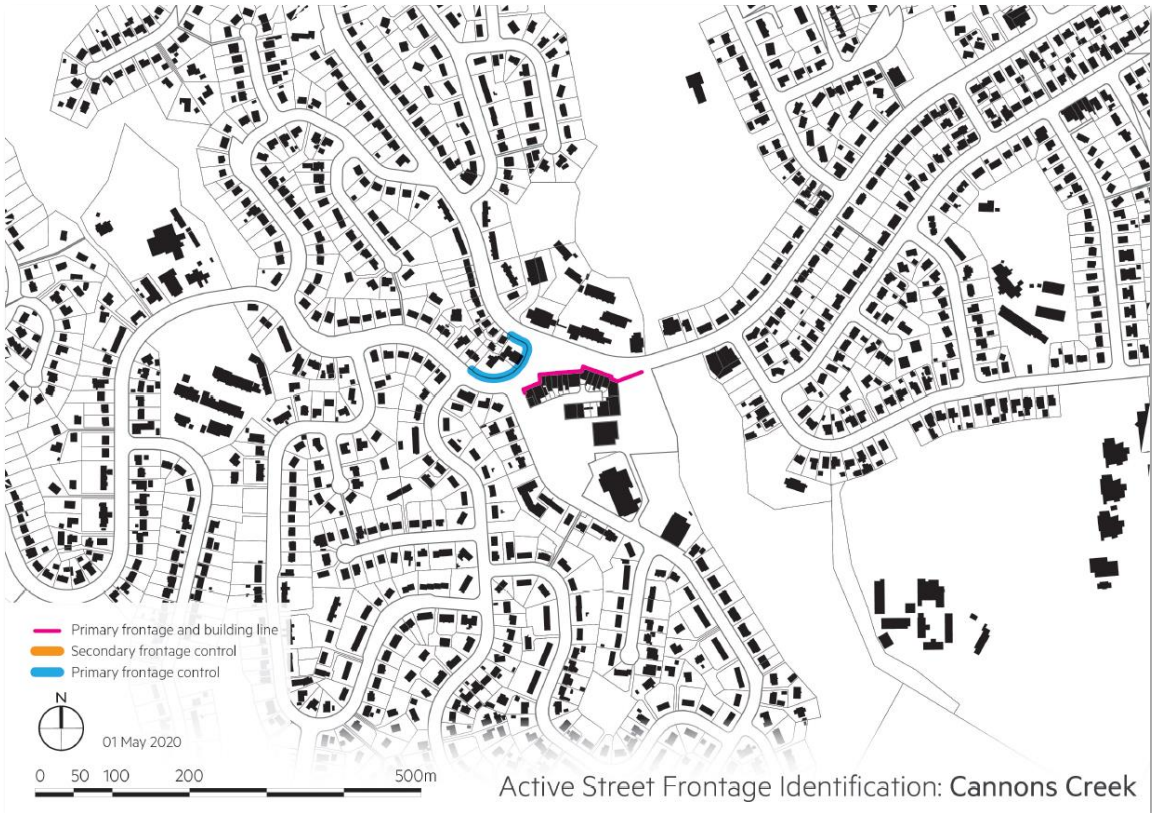
derives from an extended planning grid rather than common building lines. These characteristics make an ASF impractical and unnecessary.

Group C also contains two Local Centres, both of which are outliers. Aotea Local Centre consists of a single large format retail building: a stand-alone Countdown supermarket. Although site and building are well designed, the location ranks poorly because of its isolation (as a lone commercial entity), and because it has a strong vehicle orientation. The other outlier is Mana South LCZ, which resembles a MUZ rather than a Local Centre. Here, most buildings resemble industrial sheds and the only significant retail activity is a service station. Neither of these locations warrant the introduction of an ASF standard.

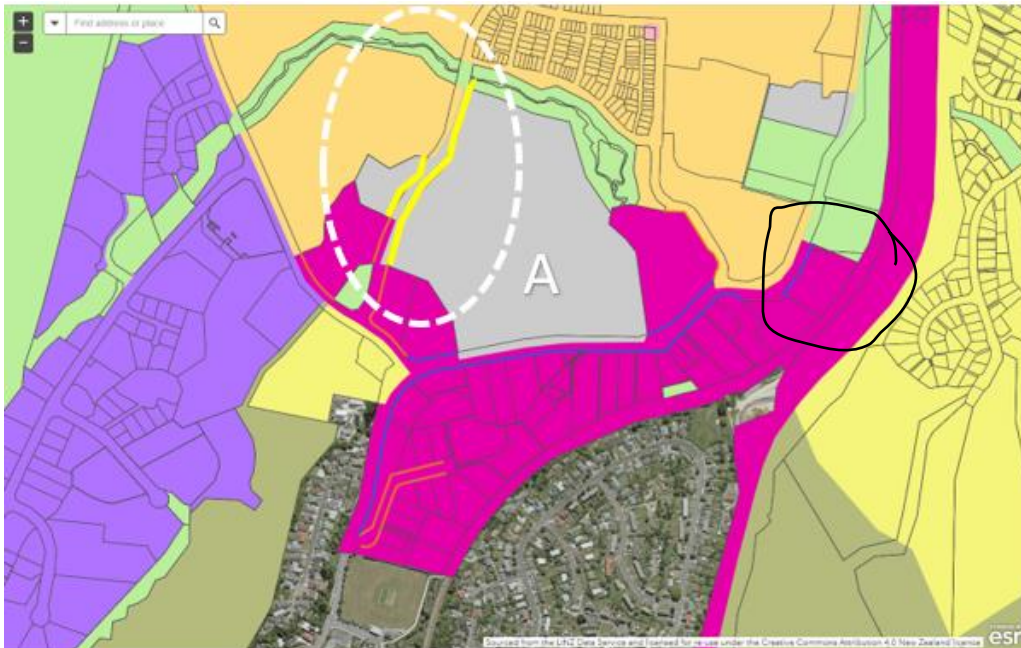
The treatment of Group C frontages remains important, because all MUZs should contribute to high-quality public streetscape. Furthermore, if they adjoin residential areas, Mixed Use areas should have a positive visual relationship with neighbouring housing. However, these objectives do not require introduction of an ASF standard. Instead, they suggest a need for more generous front setbacks and significant investment in on-site landscape.

Summary of Recommendations

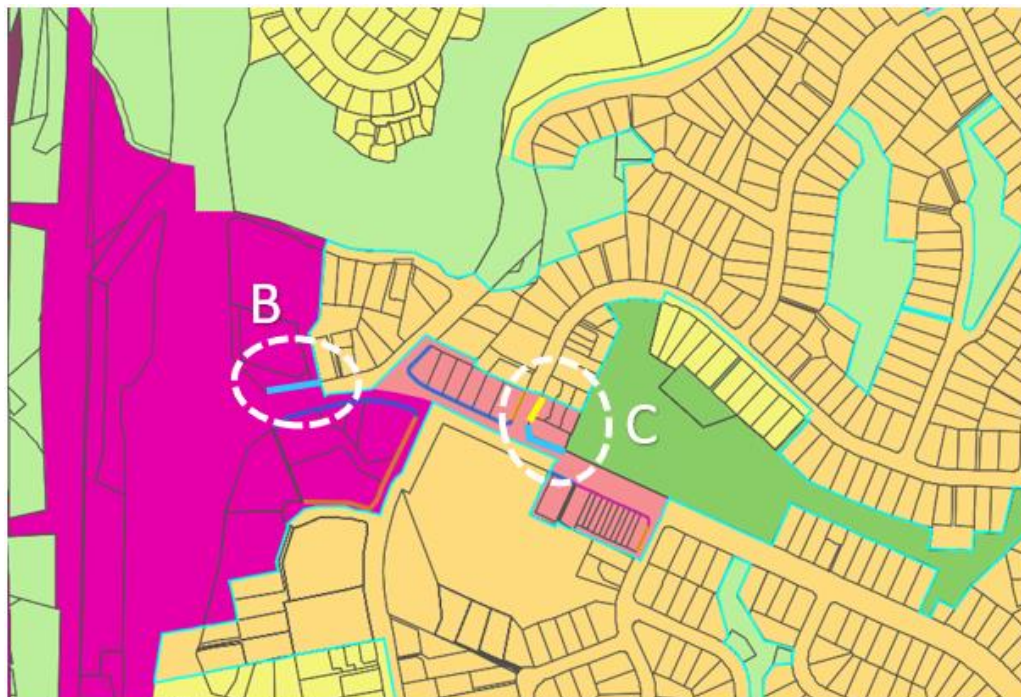
1. Introduce a *generic* ASF standard to the LCZ in four locations (see below). This standard should require an active built edge along the full length of designated front boundaries (see Maps 1-4):
 - a. Ranui LCZ (Mungavin Ave turning into Martin Street)—see Map 1
 - b. Titahi Bay (Whitehouse Rd and Little Theatre site)—see Map 2
 - c. Plimmerton (corner of Beach Rd and Steyne St)—see Map 3
 - d. Cannons Creek LCZ (Mungavin Ave and Champion St)—see Map 4
2. Introduce a *special* ASF standard to remaining Steyne Street frontages within the Plimmerton LCZ. This special standard should require an active built edge occupying between two-thirds and four-fifths of designated front boundaries (see Map 4).
3. Do not introduce ASF standards to the Local Centre Zone in five locations:
 - a. Aotea
 - b. Mana North
 - c. Mana South
 - d. Waitangirua
 - e. Whitby
4. Do not introduce ASF standards to the Mixed Use Zone.



1.3 Urban Design Review of District Plan Maps (20 July 2020)



KENEPURU MUZ: Extend secondary frontage control within hospital zone (see A above). Agree all other changes.



RANUI LCZ: Extend primary frontage along western end Mungavin Ave (see B above). Extend primary frontage along eastern end Mungavin Ave and add secondary frontage along west side McKillop St (see C above). Agree all other changes.