

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:

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Company/Organisation <i>if applicable</i>			
Contact Person <i>if different</i>			
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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):

The specific provision of the proposal that my submission relates to is Proposed future urban zone for Judgeford flats area
Do you: Oppose the proposed industrial zoning of this area and want to discontinue the expectation that it will ever be suitable for industrial use beyond the current uses
What decision are you seeking from Council? Permanently discontinue the future expectation of industrial use for Judgeford What action would you like: Delete the designation of 'Future Urban Zone' from Judgeford and retain the area as general rural
Reasons:
<p>While I acknowledge that PCC through the National Policy on Urban Development 2020 (NPUD) and the Future Growth Strategy for Porirua 2018 is obliged to identify areas within the Porirua Region for future urban growth, I do not support this growth taking place in areas currently used as rural or semi-rural land.</p> <p>I also acknowledge that new roading links may create a demand for transport hubs and warehousing and storage facilities. HOWEVER again I do not support using rural land for these. It is my belief that it is environmentally, financially and socially more responsible for PCC to intensify current land use and make better use of land already connected to infrastructure, housing, roading and public transport links than it is to extend industrial development into rural areas.</p> <p>Specific to Judgeford, Judgeford is not a suitable area for future urban or industrial growth within the NPUD. Judgeford does not currently meet objectives or criteria related to:</p> <ul style="list-style-type: none"> • Traffic safety • Public transport provision, or scope to provide and develop this • Adequate routine 'three waters' provision for wastewater, storm water and sewerage • Geotechnical safety considering the constricted topography and local fault zones • Management measures for a flooding zone • Ensuring environmental balance, meeting environmental threats and providing some environmental protection <p>More detail on the current state of Judgeford as regards the NPUD is given below.</p>

Re the National Policy on Urban Development 2020

2.1 Objectives

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Re Objective 1: Judgeford is not an urban environment. Porirua already HAS urban environments and effort would be best placed there to improve them using the existing infrastructure.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) the area is well-served by existing or planned public transport
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Re Objective 3: Judgeford is located FAR from any centre zone and has very few employment opportunities. It is not well served by existing or planned public transport. There is no high demand for housing or for business land in the Judgeford area because there is no water supply or sewerage service available to service larger numbers of housing or increased numbers of businesses. The high cost of installing these could not be recovered from new businesses or residences alone and would have to be amortised across the ratepayer base. This is not ethical and would also create a future maintenance liability for Porirua which is already struggling with infrastructure costs.

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions; and
- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.

Re Objective 6: Integrated decision making appears to be absent, and unlikely. NZTA has not factored industrial development at Judgeford into traffic planning, in fact the current planning post-Transmission Gully is already deficient as regards existing and projected traffic volumes. Access to SH58 from Judgeford side roads as planned by NZTA would not cater for increased development at Judgeford, and the side roads themselves are not large enough or strong enough to take more traffic. Maintenance costs are already too high and maintenance is already deficient.

Further constraints and conditions for Judgeford

To recognise the character and condition of the area and to mitigate the concerns identified above, rather than a 'future urban zone, these constraints are proposed for Judgeford:

Permitted activities: The flat areas of Judgeford should never be used for industrial or higher-density activities. Permitted activities in the flat areas should be restricted to those low density light industrial activities and low-density recreation facilities as are already present, ie, a continuation of existing permitted activities: BRANZ, the Judgeford Kennels, etc. Any activity that would involve increased risks of adverse effects, due to the area's environmental and geotechnical circumstances such as areas of native bush, earthquake, slip and flood hazards, should be excluded

Existing businesses and activities as at the date of this submission should be "grand-fathered" ie deemed to be permitted.

Specific concern - water quality: Large parts of the Judgeford Flats area are subject to sudden flood water ponding area affected by tidal flows. The stream corridors drain directly into Pāuatahanui Inlet, which is an area already compromised by silt, sedimentation and runoff. There are four areas of the inlet already under Department of Conservation management. No

activities at Judgeford should be undertaken to render the state of the Inlet any worse or to make current and future management and clean-up work more difficult.

Specific concern - traffic management: Traffic on State Highway 58 is already a significant concern. The Transmission Gully works will increase traffic volumes and require larger SH58 setbacks otherwise the area's reputation for accidents will continue.

Conclusion

Given the obvious failure of Judgeford Flats to meet the objectives and criteria as set out in the NPUD 2020 I request the zoning of this area as a future urban zone be permanently removed and changed to General Rural. Retaining any mention of a future urban zone creates expectations for the future which, for the reasons above, will not be able to be met.

I request instead that PCC properly investigate and develop areas for future business/commercial growth which are already served with transport links and have infrastructure in place. Growth of this type would be less costly to implement and manage and create less impact on the environment. This means I am requesting PCC to support brownfields developments and make full use of the established and well-serviced industrial areas of Porirua.

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

Michaela REILLY

20 November 2020 _____