### RMA FORM 5

## poriruacity

# 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> Jones		First Robin		
Company/Organisation	Plimmerton Residents' Association Inc				
if applicable					
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	021 129 3321				

2.	This is a <i>submission</i> on the <b>Proposed District Plan</b> for Porirua.			
3.	I could □ I could not ☑ gain an advantage in trade competition through this submission.  (Please tick relevant box)			
	If <b>you could</b> gain an advantage in trade competition through this submission please complete point four below:			
4.	<ul> <li>I am □ I am not □</li> <li>directly affected by an effect of the subject matter of the submission that:</li> <li>(a) adversely affects the environment; and</li> <li>(b) does not relate to trade competition or the effects of trade competition.</li> <li>(Please tick relevant box if applicable)</li> </ul>			

	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):			
	pecific provision of the proposal that my submission relates to:			
Rezor	Ting			
Resid GRZ ( MRZ / Do yo We o	3 - Area Specific Matters ential Zones General Residential Zone Medium Density Residential Zone  w: Support? Oppose? Amend? ppose the rezoning of properties in Plimmerton from General Residential to Medium ty Residential.			
	What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?			
(1) We detail design	e submit that the MRZ designation is inappropriate for <u>all</u> the lots identified in Plimmerton(see s below under Reasons) and therefore ask that this designation be lifted from all properties so nated in:			
Bath S Grays James St And Schoo				

Pope Street (130, 130A, 132B)

(2) We are also concerned that residents are not being properly informed under the Proposed District Plan regarding zone changes affecting their own or neighbouring properties. We ask that for all zone reclassifications PCC contact the affected landowners and their immediate neighbours directly to advise them of the change, the implications of the zone change, and give them a chance to submit /comment directly. The Proposed District Plan should include the process for rezoning properties and the notification and consultation required.

#### Reasons:

#### (1) Objection to MRZ Zoning

The Proposed District Plan zones the majority of properties in Plimmerton/Camborne as General Residential, but also rezones certain properties (around 70-75 residential lots) in Plimmerton as Medium Density Residential (MRZ). This would enable sites to be developed as multi-unit properties, up to three storeys high (11 metres). Our established and longstanding community is currently mostly comprised of one to two storey buildings.

The properties affected by MRZ zoning in Plimmerton are on St Andrews Road (SH1), Pope Street, Taupō Crescent, Steyne Avenue, Bath Street, School Road, Grays Road and James Street.

Plimmerton Residents' Association (PRA) oppose this change for the following reasons:

- 1) The criteria for identifying these properties for MRZ as opposed to others is unclear. While we understand the proximity to services and commerce, most of the MRZ properties identified in our community are topographically unsuitable for intensification or are subject to coastal and flood hazard tags. This rezoning is therefore unlikely to add significantly to the city's housing stock. The General Residential Zone appears to adequately provide for one to two storey multi-unit development where it is viable on these lots, and it is noted that several of the lots already have multiple low-rise units.
- 2) The higher height allowed under MRZ means developments would be totally out of context with existing character of Plimmerton as a coastal and suburban village environment. For example, if the five properties from 14 to 20A Steyne Ave were redeveloped as three-storey multi-unit properties heritage properties would be destroyed, coastal sight lines would be impacted, and neighbouring properties could have light, sun and privacy issues with an 11 metre high property set back just one metre from their boundary.

There are already multi-unit properties in our community, mostly one to two storeys high. We note that elderly residents downsizing favour single level dwellings on flat sites with good access to the village and transport, as is evidenced by the current multi-unit properties in James Street and School Road.

- 3) The existing stormwater and wastewater infrastructure struggles to cope already, especially in James St and St Andrews Road. These issues are well documented in Wellington Water's Taupō Stream Stormwater Model Build report (supplied as a supporting document to inform the Proposed District Plan). PCC DP overlays clearly show the existing flood hazards. There have been significant flooding events (most notably in 2016), and less significant events occur regularly. If additional housing and new connections are being added, the infrastructure needs to be upgraded first. The concept of hydraulic neutrality should be replaced with hydraulic positivity where the existing infrastructure is failing to cope.
- 4) Many of the MRZ properties have been identified as subject to flood or coastal hazards. We do not believe these properties would be suitable for intensification.
- 5) Many MRZ properties fall into the Rail Corridor and would be subject to acoustic constraints We note that the current upgrade to Plimmerton Station is to allow for increased rail movements with an additional track, thereby adding to the noise and vibration impacts of the rail corridor.
- 6) Many MRZ properties are accessed directly off SH1, and subject to with NZTA constraints. We have been informed by NZTA and PCC officers that it is likely that St Andrews Rd will continue to have SH status after Transmission Gully opens, and that it will continue to service high volumes of traffic. It does not therefore make sense to increase the number of vehicles entering/exiting the state highway

from private properties.

Some additional comments on specific properties/groups of properties identified for MRZ rezoning:

36A Taupō Crescent & 36B Taupō Crescent - These properties are a steep walk-up path from St Andrews Road and have drive-on only down a very steep narrow shared driveway from Taupō Crescent.

2 Bath Street (HHB031) and 14 Steyne Avenue (HHB030) - Heritage overlay and listed on Plimmerton Heritage Trail

192-194 St Andrews Rd - no heritage overlay but the Kirkcaldie House is listed on Plimmerton Heritage trail.

<u>All</u> of James Street and some St Andrews Rd and Grays Road properties are subject to flooding and ponding hazard overlays. We note that several multi-unit/subdivision developments have already been approved in James Street and Grays Road. Two of these sites are requiring extensive earthworks to prepare the land and raise it above the flood plain. One even includes plans for a pole house with a Flood Escape route! It does not seem sensible to consider building three storey blocks and potentially compounding existing flooding issues in this fragile area.

130, 130A and 132B Pope Street - steep hillside sites on a narrow shared driveway

14, 18, 20 Grays Road - no drive on access from Grays Rd. #14 is a steep walk up, 18 & 20 have steep drive-on access over road reserve on Taupō Crescent.

1, 3, 5, 7 Steyne Ave - flood hazards and ponding, Rail corridor. Impact on village character.

School Road (<u>all lots</u>) - flood hazards and ponding, coastal hazard (future), Rail corridor. Would increase traffic adjacent to school.

St Andrews Road (all lots) and 65A-D Steyne Ave - NZTA and KiwiRail corridors.

Summary: We ask that PCC reconsider the reclassification of <u>all</u> MRZ properties in Plimmerton. Very few of the properties identified could be developed to add significant additional housing stock and the negative impacts on the existing community amenity values through larger and higher multiunit developments far outweigh any benefit gained. We ask that these properties be zoned General Residential like their neighbours, and subject to the provisions for multi-unit developments allowed for under that zone.

#### (2) Comment re notification re re-zoning

We ask that for <u>all</u> zone reclassifications the Proposed District Plan should include the process for assessing re-zoning requests and the required public notification/consultation. PCC should be required to contact the affected landowners and their immediate neighbours directly to advise them of the change, the implications of the zone change, and give them a chance to submit /comment directly. The public notification given of the Proposed District Plan Consultation in August was very general and affected residents were not alerted to changes specifically relating to their property. An example of this is the planned rezoning of rural land at 10A The Track (DP 86437) to enable a five lot subdivision. This subdivision will directly impact on the residents of Corlett Road as access for earthworks, construction and future landowners will be via that narrow cul de sac but neither the current residents nor an immediate neighbour on The Track have been notified of this significant change. We also note that the property borders the Taupō Swamp Outstanding Natural Feature and Landscape (ONFL002) and we wish to see that any development requires appropriate mitigation in place to ensure it is protected.

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 <a href="mailto:dpreview@pcc.govt.nz">dpreview@pcc.govt.nz</a>

Signature of submitter			
(or person authorised			
to sign			
on behalf of submitter):			
		Date:	
	A signature is not required if you make your submission by electronic means		