

Pukerua Bay Residents Association

Submission on the District Plan Variation 1 Northern Growth Development Area

11 September 2022

This development proposal and the associated District Plan and structure plan have been the cause of significant concern within the Pukerua Bay community. Residents understand the likelihood of significant disruption to the community during construction and a profound change to the feel and operation of the community as its population more than doubles in size.

The Residents' Association shares many of those concerns. However, we also acknowledge that more intensive housing development is a government imperative and both we and the local councils are largely powerless to prevent it. The feedback we have had from our community is that, while some people want the community to remain unchanged, other residents see the potential for improvements in the range of dwellings in the community and the benefits that could bring to community diversity and scale to support a wider range of services. We need to find a balance, and the District Plan variation and structure plan provide a means to achieve this.

We also acknowledge that PCC has already incorporated many of the concerns and suggestions from residents about the development, and we are pleased to see much of the feedback provided in submissions and collected at the community workshop the Association organised in April reflected in the plans we are submitting on here.

We have structured our submission in two documents: the first is this document, which includes a list of requests for items or changes to the wording to be included in the text of the District Plan, and some discussion on the management of the plan; the second is a marked-up copy of the District Plan variation. There is, sometimes extensive, discussion of each of these points to back up our requests. Our approach is to both identify points where suitable or stronger protections can be built into the plans, and to suggest changes that would improve the quality of living in the urban environment for new residents.

Issues that should be included in the District Plan or its management

Climate change

Climate change is a significant issue for Porirua, and the City Council has a strategy to respond, based on engagement with communities. We were surprised that the District Plan, which manages the use of resources in the area, did not mention it. We believe it should be explicit in the DP, particularly in an area that, like most of the farmland around here, is susceptible to slips in wet weather.

We believe there needs to be explicit linkage to PCC's climate change strategy, which we have done with new text in the introductory principles. We have also included two points in the text of the DP to reflect the following:

- Low-carbon future — links made to transport and connectivity to minimise use of private vehicles and maximise use of public transport and links to cycle paths;
- Resilient communities — build to withstand extreme weather events. Some of this will be at the resource consent stage, but it needs to be captured in the plan to give it weight for subsequent decision-making.

Natural hazards

The city has suffered significant damage to land in recent years from slips and floods caused by heavy storms. Serious storms in 2017 caused more than 100 slips on PCC land, which cost more than \$5 million to fix. Recent storms have seen more, similar damage. There are new slips on the Mt Welcome block after the recent rains. There aren't any on the Muri Rd block, but it is currently covered with forest and will be more vulnerable when the trees are removed. Both sites will require stabilisation as part of the subdivisions. With extreme weather events becoming ever more likely, we can expect the recent high number of slips from rainfall and storms to continue.

Subdivision landform needs to be designed to prevent future damage from erosion as much as possible. This might limit the ability to maximise the efficient use of land for housing, but will prevent longer-term damage, costs and problems for residents and PCC. Paying for the damage caused by slips can often fall into a black hole between private insurers and EQC, causing much misery and financial distress for home owners. PCC's rules need to take a precautionary approach to this wherever possible.

According to the online PCC hazard maps, the area in the Structure Plan is relatively free of natural hazards. There are no earthquake fault lines through the site, although there is one to the west of the existing village, and another to the east of the development site. There are some small areas of flood potential identified close to Grey Street.

Expert reports provided in support of the DP variation say the existing PDP provisions are sufficient. However, pg 93 of the Section 32 Evaluation Report says, "While some of the western part of the site has been modelled for flood hazard risk and consequently has identified Flood Hazard overlays identified on the PDP maps, *a large portion of the site has not been modelled* [our emphasis]."

Our request

1. We have suggested wording for a new principle 'Climate change and resilience' in the introduction to the DP variation that states that preparing for the impacts of climate change and natural hazards must be a fundamental principle of the plan and stated up front.
2. PCC should prioritise modelling of natural hazards across the whole site and the identification of adaptation required to changing risks from climate change impacts before development of the site.

Cultural values

We have inserted another reference into DEV-NG-P4 (Inappropriate development) to areas of significance in the area to Māori and the cultural values and historic sites to be recognised, identified and protected during development, and to be protected and enhanced (if possible) in the future, as the community develops. We believe it needs more recognition than simply being something to consider, as stated in DEV-NG-P3 (Potentially appropriate development).

Our request

Retain the extra wording added to DEV-NG-P4 (3).

Transport and movement

Walkability is an issue for all movement around the development and as part of an integrated transport system. A key way to reduce fossil fuel use and thus mitigate climate change is to design walkable neighbourhoods, where people are c.15–20 minutes walk from key amenities, such as schools, supermarkets, medical centres, etc., and have access to regular, convenient and efficient public transport.

At the moment, the plan variation doesn't talk about the design of roading in the development, other than the indicative routes and the incorporation of public transport into them. The transport analysis paper (prepared by Tim Kelly Transport Planning for PCC) discusses the assumption that most traffic in and out of the site will be via the SH59 connection. This background paper also identifies the need to provide a safe crossing point at the southern end of the new development across SH59 to Ara Harakeke for cyclists and pedestrians. This is important for both recreation and transport to facilities and shopping in Plimmerton and Mana.

However, there will be a period of transition while stage 1 on 34 Muri Road is being built and people start to live there when there will not be any access directly from SH59. During this time, the traffic along Muri Road will increase significantly from logging trucks taking logs out, commercial vehicles in and out during construction, as well as new residents, until the SH59 access is open.

While Muri Road has the appearance of a quiet country lane, there are approximately 70 houses at the northern end of it past the intersection with Sea Vista Drive, and there are (according to the vehicle survey in the transport analysis) almost 260 vehicle movements a day coming from or entering the northern end of Muri Road at the Muri Road/Sea Vista Drive intersection, which was 47 percent of the vehicles counted during the morning and evening peak periods.

This stretch of road is also popular with pedestrians. It is both part of a popular walking circuit around Pukerua Bay, and the most direct pedestrian route for people living on Muri Road to get to the train station. Many of these commuters walk along the road, which does not have a built footpath for most of its length, in the dark during winter. Some people walking the Te Araroa walkway use Muri Road.

There will need to be clear grade separation along this stretch to keep pedestrians safe, which will take up a considerable amount of space.

Our request

1. Ensure that people living in houses across the whole development are within a safe and reasonable walking distance of public transport, whether that be buses (which would require one or more new bus routes being created) or train stations.
2. Ensure the connection to SH59 includes a safe crossing for pedestrians and cyclists over the state highway to allow non-car access to train stations to the south. Investigate the feasibility of building another train station around Airlie Rd to provide more convenient access to public transport to reduce the increase in traffic heading south on the state highway.
3. It would appear that, because the land for Stage 1 is already zoned residential, it is not covered by this DP variation. However, this is a critical issue of both safety and convenience to residents along most of the length of Muri Road, and many other recreational users of the road. These concerns must be noted and be part of PCC's consideration of resource consent applications for this and subsequent stages of the development.
4. PCC needs to work with other agencies and the developers to adequately support the stages of development to mitigate the impacts of development, particularly on access to public transport and movement into, around and out of the new communities, and to allow progressive access to these forms of movement as the new community is developed.

Infrastructure

The provisions for this and the capacity of the system in the whole Northern Growth Area (NGA) are currently inadequate, particularly for storm and wastewater management.

This is by far the weakest part of the whole proposal, given current funding limitations.

Waste water

According to the 'Infrastructure Report' prepared by Envelope Engineering, the proposed on-site storage of wastewater, which would be held during peak flow and then released up to 24 hours later, would be sufficient to manage the waste water produced by the development without adding to the capacity constraints in the existing system (i.e. limited extra capacity in the pipes to the existing Waste Water Treatment Station).

PCC's ability to pay for infrastructure

The requirement of extra infrastructure exceeds PCC's ability to pay for it. The application to the Infrastructure Acceleration Fund (IAF) in August 2021 shows PCC expects the cost of extra infrastructure in the NGA to be \$260,535,504. One third of that (\$81,657,881) was to come from the IAF, with the remaining two thirds (\$178,877,623) to come from council, developers and Waka Kotahi. PCC is currently borrowing to its 'prudent limits' over the 30-year term of the LTP, and its ability to increase rates to cover the extra cost is limited. Although developers say they understand the need to pay

for it, they will naturally try to negotiate the cost down to minimise their costs. The current financial limitations restrict the number of houses that can be built, meaning the proposals are less likely to meet the government's expectations or policy objectives.

The impact on the system is greater than the immediate site impacts, and there is a significant cumulative impact further along the system, which is already often operating at capacity. The suggestions in the Envelope Engineering report for managing waste water on-site look like attempts to create workarounds for an overburdened system, rather than a system-wide, sustainable solution (as mentioned in the PCC IAF excerpt below).

Having missed out on the funding from the IAF, PCC now seems to be putting its faith in a combination of the government's Three Waters proposal and Kāinga Ora taking over governance of the NGA to possibly unlock extra central government funding. However, hope is not a strategy, and this seems to be the weakest aspect of the whole proposal. If it is not clarified, it brings into doubt the ability of the NGA to meet its objectives.

In PCC's own words (PCC IAF application, Part B, 1(c)):

"A principle we have applied is that individual, on-site infrastructure solutions that are temporary work-arounds ahead of global solutions to network infrastructure problems should generally be avoided. This is because the on-site solutions duplicate infrastructure costs, which ultimately add to per unit housing costs. Funds spent on-site are funds not applied to network solutions and may adversely affect the affordability and viability of network solutions. On-site solutions also lead to future maintenance issues, often with blurred responsibilities.

PDL [Plimmerton Development Limited] is able to advance, in the short term, a 50 lot subdivision that can use existing infrastructure capacity. The subdivision is at the resource consent pre-application stage. The remainder of the site depends on upgraded network infrastructure. Master planning and design documentation for a precinct of 600 dwellings will be ready for resource consent lodgement in Q1 2022. Without IAF funding, PDL will deliver 700 houses by 2029 and 1400 by 2036 (out of the NGA potential 6000 houses). IAF funding would accelerate PDL housing provision to 1400 houses by 2029 and 2000 by 2036.

The BCL [Barber Construction Limited] site includes approximately 13ha of land zoned General Residential in the Operative District Plan (and the PDP) that can use existing infrastructure capacity for 20-40 lots. BCL is progressing design for that area and intends to lodge resource consent applications in 2021. Development of the remainder of the site depends on upgraded network infrastructure and rezoning.

Development of the Classic site depends on upgraded network infrastructure and rezoning. Once these constraints have been resolved, Classic intends to lodge subdivision and land use consent, with site works to follow immediately.

In summary, without IAF funding, the NGA will deliver 720 houses by 2029 and 1420 by 2036 (out of the potential 6000 houses). IAF funding would accelerate housing provision to 2600 houses by 2029 and 4300 by 2036.”

PCC has included several potential infrastructure projects for Pukerua Bay in the IAF application:

- a new water reservoir — building starts in 2023 with IAF funding, and 2037 without (\$24million),
- pedestrian, cycling and micromobility access across SH59 to the train station — building starts in 2025 with IAF funding, and 2039 without (\$10million),
- SH1 gravity sewer capacity increase (Pukerua to Plimmerton) (\$24million),
- a number of increases in gravity sewer capacity and pumping station upgrades south of Plimmerton.

There are also two reservoirs proposed for the Plimmerton Farm development.

According to the Section 32 Evaluation Report, pg 74, “The NGA is already identified in the PDP as FUZ is also there ‘infrastructure-ready’ under clause 3.4(3)(f) [of the NPS-UD].”

Clause 3.4 of the NPS-UD says:

*“(3) Development capacity is **infrastructure-ready** if:*

(d) in relation to the short term, there is adequate existing development infrastructure to support the development of the land

(e) in relation to the medium term, either paragraph (a) applies, or funding for adequate development infrastructure to support development of the land is identified in a long-term plan

(f) in relation to the long term, either paragraph (b) applies, or the development infrastructure to support the development capacity is identified in the local authority’s infrastructure strategy (as required as part of its long-term plan).”

LTP 2021-51, pg 170 says

“Infrastructure for future urban zones

The Proposed District Plan identifies future urban zones including Judgeford Flats, Judgeford Hills and the Northern Growth Area. As the Proposed District Plan and subsequent variations become operative, we will understand more clearly the level, type and location of infrastructure investment needed to facilitate development within these areas. The Council will consult the public on this as part of future LTP processes. There is a possibility that privately-led development could come forward within the current LTP period, in which case developer agreements would be entered into to secure funding for enabling infrastructure, which would in turn provide clear direction for future LTP processes.”

Included in the table showing 'Planned Developments 2021-51' on pages 143 and 182 of the LTP 2021-51 are two projects: 'Pukerua Bay East & West 1200 dwellings' and 'Mount Welcome 625 dwellings'. This identifies these developments in the LTP, but it does not identify any funding for them. Therefore, neither 3(d) and 3(e) in clause 3.4 of the NPS-UD apply. We would argue that 3(f) possibly does not apply either, given that PCC not identified the infrastructure required or any funding for these works in the LTP.

To say that these developments are 'infrastructure-ready' because they are listed in the LTP, with no associated infrastructure funding identified (and with the limitations to funding discussed above), seems unjustifiably optimistic.

Our request

1. PCC does not issue resource consents for the developments allowed by the DP variation until funding for the extra infrastructure is identified.
2. Insert the word 'extra' into DEV-NG-P4 (4) to make it clear that development must provide the extra infrastructure needed in order to be considered 'appropriate' under this plan.

Urban form

Housing type

Feedback to our Village Plan survey showed that people valued a variety and diversity of houses that would suit a range of living arrangements and households, as well as stages of life. People said the housing stock in PKB lacked variety, availability and affordability, and these developments should provide these attributes. Pukerua Bay is a community that people like to stay in for a long time, even after their households change (e.g. children leave home while 'empty nesters' remain), but there are few options for people to downsize. These new communities should provide a range of dwelling options to allow people to downsize and remain in their community. There should be options between the extremes of a family home and a retirement village.

The experience of visitors and residents with limited mobility is that many areas of Pukerua Bay are inaccessible unless there is a hard formed path. We should learn from the mistakes past communities have made and ensure the new developments are as accessible as possible for people with limited mobility. This also applies to the design of buildings and sections to create communities that everyone can find a home in.

Our request

1. Keep the new wording added to the first principle in the introduction to the DP, 'Urban form'.
2. PCC continues to support the development of a design guide that supports and encourages universal design principles for homes and recreational spaces.

Open spaces

There needs to be a network of open spaces at street level where neighbours can gather informally. They should have all-weather surfaces (i.e. paving), seats, shade trees and other vegetation. The point of these is to create spaces for passive recreation and

socialising close to people's homes so they do not have to walk any great distance to a larger park or reserve, which are more active zones. These should also provide safe places for small children to play close to their houses.

Our request

Keep the extra wording added to the introductory principle 'Recreation areas' and to DEV-NG-P2 (10).

Freshwater

There needs to be a high bar for protection of freshwater areas not included in the SNAs, such as streams and gullies on the Mt Welcome block. The Structure Plan identifies many new freshwater management areas in both blocks. DEV-NG-P2(8) invokes the NES-F, water sensitive design principles and Wellington Water Water Sensitive Design for Stormwater guidelines, and "Recognises and provides opportunities to enhance freshwater ecology, public access to and along freshwater bodies, and resilience to flood risk;".

To be clear, as well as our desire for access right around these areas for recreation and maintenance, our intention here is to also make it explicit that neighbouring properties must not be allowed to encroach on reserves, ecological corridors, freshwater areas and SNA buffer areas, and restrict public access along the margins of these areas. We want these areas to be as accessible as possible in perpetuity.

Our request

1. Include the suggested wording into the DEV-NG-R3 1(a)(iv) and (v) to provide access around freshwater areas, ecological corridors and SNAs for recreation and maintenance.
2. Include the suggested wording in DEV-NG-O2(9).

Monitoring and evaluation

These two developments will be almost as big as Plimmerton Farm. The issue of regulatory bodies, in particular PCC and Greater Wellington, being able to properly monitor compliance with resource consents and the DP was extensively litigated during the Plimmerton Farm DP and resource consent stages. PCC has allocated dedicated staff resources to these tasks. Given the scale of the two developments included in the Pukerua Bay Structure Plan and the land already zoned residential, they need the same amount of PCC staff resources dedicated to monitoring compliance with the DP variation, the Structure Plan and any resource consents issued for the work.

Our request

PCC to allocate dedicated resources to monitoring and evaluating the works to ensure compliance with the DP, resource consents and the provision of medium density housing with a variety of housing types, sizes and tenures envisaged in the DP.

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