



Te Awarua-o-Porirua Harbour and Catchments Community Trust and The Guardians of Pāuatahanui Inlet Submission on Variation 1

1 General

The Te Awarua-o-Porirua Harbour and Catchments Community Trust and the Guardians of Pāuatahanui Inlet are principally interested in ensuring that Variation 1 adopts controls and limits to development in such a way that any resulting development:

- Avoids the incursion of sediment, contaminants and nutrients into the water bodies and Te Awarua-o-Porirua; and that
- The ecological integrity and functioning of Te Awarua-o-Porirua is at least preserved and preferably enhanced.

Our submission covers matters we support for the above reasons and proposes amendments to better protect the harbour and catchment integrity and ecology. These are designed to control and limit run off and its adverse effects, specifically including:

- *The effects of sediment, contaminants and nutrients entering water bodies*
- *The risks of excess and contaminated run off from stormwater and sewerage systems, and*
- *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

In making this submission we are of the view that the Government's requirements for Porirua City to apply the provisions in this amendment will inevitably risk undesirable patchwork development that will:

- Lead to an increase in sediment, contaminants and nutrients entering water bodies and then Te Awarua o Porirua;
- Have adverse consequences on the city's infrastructure and especially stormwater, sewerage, roading and transport systems; and
- Lead to progressive deterioration in the level and quality of the built environment and the level and quality of amenity that it supports.

We consider the requirement to have no mandated off-street parking is totally inappropriate for the Porirua urban area. It has developed as a low density, car-based environment. Walking and cycling provide limited options to access key services and amenities, and public transport services are limited. Any change to have a non-car based urban environment will take decades to achieve.

The provisions that the city is now forced to apply will not only result in streets being progressively congested but will increase vehicle-based contaminants (such as oil, grease, zinc and accumulated dirt), entering water bodies and Te Awarua-o-Porirua.

Further we consider the following points are important and need to be considered when any medium or higher density developments are proposed:

1. North and northwest facing hillsides such as those in the Paremata area are, with reasonable frequency, visited by high winds. Any large buildings will potentially create areas where the wind is accelerated, particularly by high buildings. These impacts should be the subject of research before any such building is allowed. The impacts will not just affect the large/high buildings and lots, but also surrounding properties. Rain will also be more forcefully driven into the hillsides increasing the erosion potential and thus sedimentation and contaminant flows into the harbour.
2. Many of Porirua's hillsides are unstable. This problem is made worse should steep sided excavations be made to accommodate high rise buildings. Excavation slopes should be limited to no more than 45 degrees. That would allow the slopes to better support the weight of higher parts of the hillsides, allow better and deeper-rooted vegetation to thrive and provide more opportunity for water to be absorbed and released progressively. Careful consideration should be given to potential hillside erosion.
3. There is already significant development of the hillsides. These developments are supported by retaining walls of various types. Potentially undermining these walls with downhill excavations could have disastrous consequences for the existing retaining walls. All developments should be closely vetted for possible impacts on stability of higher retaining walls.

We therefore consider that the higher density proposals in Variation 1 pose considerable risks to properties, hillside stability, and transport systems. These proposals also risk excess and contaminated run off from stormwater and sewerage systems and particularly risk damaging the sensitive environment of Te Awarua-o-Porirua.

This said, we consider that, in the circumstances, Porirua City has developed proposals in this Variation 1 that will help reduce some of the above adverse consequences, but we consider Variation 1 needs further amendments to lower the risk to water bodies and Te Awarua-o-Porirua.

We submit that the following amendments should be adopted:

2 Residential Zones

RESZ - General Objectives and Policies for all Residential Zones

We do not see any reference in these objectives and policies to protecting or enhancing natural resources and especially fresh and marine water ecosystems. This is in stark contrast to provisions in the Northern Growth Area (see below). The only indirect reference is to amenity values in RESZ O2, plus the mention in RESZ P2 of limiting development where it (presumably adversely) affects Māori and their culture and traditions, including water.

We therefore propose that another objective be added as RES O4:

RES O4: A Sustainable and Healthy Environment

The intensity, form and design of use and development in Residential Zones sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving [waterbodies](#) including Te Awarua-o-Porirua Harbour and other downstream catchments.

Note - these words are copied from DEV NG O2 - proposals for the Northern Growth Area. We consider them to be most appropriate and relevant and therefore **we submit they must be adopted as a requirement for all development in the city.**

RESZ P5 be amended to read:

Buildings and Structures

Enable [buildings](#) and [structures](#):

1. That meet the health and well-being needs of people and communities; and
2. Are of an intensity, form, scale and design that achieve the planned urban built form for the zone or precinct they are in; and
3. *Minimise adverse effects on natural resources including:*
 - *The effects of sediment, contaminants and nutrients entering water bodies*
 - *The risks of excess and contaminated run off from stormwater and sewerage systems, and*
 - *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

3 MRZ - Medium Density Residential Zone

We **strongly support** the site coverage limit of 50% for this zone (MRZ S4) and consider this will help reduce the impact of multi storey buildings appearing somewhat randomly in what is otherwise a lower density environment.

We consider, however, and **submit** that the landscaped area should be increased to 30% of any site. With no requirement for off street parking there is a risk that there will be too much of a site covered in impermeable surfacing. To minimise adverse effects from stormwater run-off, we consider an increase in the landscaped area is a prudent measure. A

requirement for any off-street parking areas to be in permeable surfacing would also help and **we submit** this should be mandated.

We **note** and **strongly support** the requirement that any subdivision (the definition of which includes unit titles) in any of the zones must achieve hydraulic neutrality. **This is a critically important provision.**

4 High Density Residential Zone

We note that there is no site coverage in this zone. Given the rather minimal setback provisions in HRZ S4, we **consider and submit** that a site coverage requirement of no more than 80% should be imposed. If developments are part of a precinct that has been subject of urban design across multiple sites and which incorporates appropriate collective open space, this requirement could be waived.

Similarly, we consider that landscaped areas (HRZ S5) should be increased to 30%.

In both cases having as much landscaped open space as feasible will materially help absorb and reduce water run-off.

5 Other zones

All the following proposals and related amendments are designed to have requirements in the Plan that minimise the run-off of sediment, contaminants and nutrients into water bodies (as defined in the Plan as meaning fresh water or geothermal water in a river, lake, stream, pond, wetland, or aquifer, or any part thereof, that is not located within the coastal marine area) and which eventually risks entering Te Awarua-o-Porirua.

5.1 Neighbourhood Centre Zone

Managing the scale of use and development at Zone interface

Amend NCZ O3 to read:

NCZ O3 Use and development within the Neighbourhood Centre Zone:

1. Is of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and
2. Minimises adverse effects on the amenity values of adjacent sites in Residential Zones and Open Space and Recreation Zones *and sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend NCZ P6 to read:

NCZ P6 Built Development

Provide for built development that:

1. Is compatible with the purpose of the Neighbourhood Centre Zone
2. Is well designed and contributes to an attractive urban built [environment](#); and
3. Is of a scale and intensity that is consistent with the planned urban built form and [amenity values](#) of the surrounding residential area.
4. *Minimise adverse effects on natural resources including:*
 - a. *The effects of sediment, contaminants and nutrients entering water bodies*
 - b. *The risks of excess and contaminated run off from stormwater and sewerage systems, and*
 - c. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

5.2 Local Centre Zone

Amend LCZ O3 to read:

Managing the scale of development at the Zone interface

Use and development within the Local Centre Zone:

1. Are of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and
2. Minimise adverse [effects](#) on the [amenity values](#) of adjacent [sites](#) in Residential Zones and Open Space and Recreation Zones
3. *Sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving [waterbodies](#) including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend LCZ P10 to read:

Interface with Residential Zones, and Open Space and Recreation Zones

Minimise the adverse [effects](#) from use and development within the Local Centre Zone on directly adjoining [sites](#) zoned Residential or Open Space and Recreation by ensuring that:

1. [Buildings](#) and activities are located and designed to achieve a transition at the zone interface
2. [Buildings](#) are located and designed to minimise shading and privacy effects
3. [Buildings](#) are of a bulk, [height](#) and form that minimises dominance and/or enclosure effects
4. Screening and landscaping minimise adverse visual effects
5. *The effects of sediment, contaminants and nutrients entering water bodies are minimised*
6. *The risks of excess and contaminated run off from stormwater and sewerage systems are minimised; and*
7. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients are minimised.*

5.3 Large Format Retail Zone

Amend LFRZ O3 to read:

Use and development within the Large Format Retail Zone:

1. Are of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and
2. Minimise adverse **effects** on the **amenity values** of adjacent **sites** in Residential Zones and Open Space and Recreation Zones
3. *Sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving **waterbodies** including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend LFRZ P5 to read:

Inappropriate Activities

Avoid activities that are incompatible with the purpose of the Large Format Retail Zone *and that risk causing adverse effects on natural resources including:*

1. *The adverse effects of sediment, contaminants and nutrients entering water bodies*
2. *The adverse effects caused by excess and contaminated run off from stormwater and sewerage systems, and*
3. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

5.4 Mixed Use Zone

Amend MUZ O3 to read

Managing the Scale of Development at Zone Interface

Use and development within the Mixed-Use Zone:

1. *Is of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and*
2. Minimises adverse **effects** on the **amenity values** of adjacent **sites** in Residential Zones and Open Space and Recreation Zones
3. *Sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving **waterbodies** including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend MUZ P5 to read:

Inappropriate Activities

Avoid activities that are incompatible with the purpose of the Mixed-Use Zone *and which risk causing adverse effects on natural resources including:*

1. *The adverse effects of sediment, contaminants and nutrients entering water bodies*
2. *The adverse effects caused by excess and contaminated run-off from stormwater and sewerage systems, and*
3. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

5.5 Metropolitan Centre Zone

Amend MCZ O2 to read:

Planned urban built environment of the Metropolitan Centre Zone

The planned urban built environment of the Metropolitan Centre Zone is characterised by:

1. A built form that is compact and reflects the high-density [environment](#) of the Metropolitan Centre
2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and
3. An urban environment that is an attractive place to live, work and visit
4. *An urban environment that sustains a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving [waterbodies](#) including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend MCZ P5 to read:

Inappropriate Activities

Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone and which risk causing adverse effects on natural resources including:

1. *The adverse effects of sediment, contaminants and nutrients entering water bodies*
2. *The adverse effects caused by excess and contaminated run off from stormwater and sewerage systems, and*
3. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

5.6 General Industrial Zone

Amend GIZ O1 to read:

Purpose of the General Industrial Zone

The General Industrial Zone accommodates a range of industry-based employment and economic development opportunities that:

1. Support the wellbeing and prosperity of Porirua City; and
2. Do not compromise the purpose of the [Metropolitan Centre Zone](#) or other Commercial and Mixed Use Zones;
3. *Sustain a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving*

waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.

Amend GIZ P1 to read:

Appropriate Use and Development

Allow use and development that is compatible with the purpose and urban built environment of the General Industrial Zone and which *do not risk causing adverse effects on natural resources including:*

1. *The adverse effects of sediment, contaminants and nutrients entering water bodies*
2. *The adverse effects caused by excess and contaminated run off from stormwater and sewerage systems, and*
3. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants, and nutrients.*

5.7 Hospital Zone

Amend HOSZ O3 to read:

Adverse Effects of Activities

The adverse *effects* of activities taking place in the Hospital Zone are avoided, remedied or mitigated, particularly at zone boundaries *and all activities sustain a healthy and safe natural environment that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.*

Amend HOSZ P5 to read:

Inappropriate Activities

Avoid use and development that is incompatible with the role and function of the Hospital Zone and which *risks causing adverse effects on natural resources including:*

1. *The adverse effects of sediment, contaminants and nutrients entering water bodies*
2. *The adverse effects caused by excess and contaminated run off from stormwater and sewerage systems, and*
3. *The adverse and potentially irreversible effects on the harbour and coastal environment from sediment, contaminants and nutrients.*

6 Northern Growth Development Area

This area encompasses a sensitive environment where any development risks causing adverse and irreversible effects on two large and sensitive ecosystems:

- The Taupo Swamp and its contributing catchments; and

- The Pauatahanui Inlet via the higher land that drains east, principally into the Kakaho catchment.

Any development in this area must be carefully managed to avoid risking adverse effects from sediment, contaminants and nutrients from entering these water bodies and eventually Te Awarua-o-Porirua. In particular, earthworks and related construction cause high levels of risk and must be closely managed and monitored.

This said, we **particularly note and strongly support** the provision in DEV NG O2, 8, that says:

“Development that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving **waterbodies** including Te Awarua-O-Porirua Harbour and other downstream catchments.”

We also **note and support** the provisions in DEV NG P2 that say:

- “6 Minimises adverse **effects** on **waterbodies**
- 7 Minimises **natural hazard** risk to people's lives and properties
- 8 Demonstrates that use and development within the **Freshwater** Management Areas identified on the Structure Plan:
 - a. Considers regional plan provisions and the regulations in the **NES-F**
 - b. Is consistent with Water Sensitive Urban Design principles and Wellington Water’s ‘Water Sensitive Design for **Stormwater**: Treatment Device Design Guideline’ (Version 1.1, 2019) for the design of any relevant **stormwater** treatment devices
 - c. Recognises and provides opportunities to enhance **freshwater** ecology, public access to and along **freshwater** bodies, and resilience to flood risk;
- 9 Incorporates **stormwater** management measures for the treatment and disposal of **stormwater** at catchment and **allotment** scales, and achieve **hydraulic neutrality**”

When any development proceeds in the Northern Growth Area, we consider that both the intent and detail of these provisions must be closely adhered to, monitored and enforced.

