

## Scope of my Submission

This submission relates to the following specific provisions of the proposed Plan Change 2 :

1. GRZ-Px6 -Oppose (Area A) re.Hemi Matenga (Waikanae East) pp.1-10
2. GRZ -Px6 -Oppose (Area B) re.Whakarongotai Marae view shaft p.10
3. GRZ-Rx6 -Support: High-rise above existing carparks and retail pp.11-12
4. GRZ-Px8/Rx3 -Support: Marae Takima p.12
5. New Matter: Community Gardens and Allotments pp.12-15
6. New Matter: Existing Solar Power infrastructure compensation pp.15-16
7. New Matter: Climate Change mitigation /Ecological protection regarding existing mature trees pp.16-17

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### Introduction: My Background

Firstly, I want to commend the government and the KDC on trying to solve NZ's housing crisis and better future-proof our nation and people. We need to do better than we currently do in the areas of: housing affordability, climate change preparation, emissions reduction, sustainable energy supplies, local food production and sustainable land use.

I am concerned that some of the stated aims of Plan Change 2 actually contradict and diminish some of the other aims (above) that we need to prioritize. Even though the bulk of my submission relates to health and safety implications for Waikanae East, the 'New Matters' areas are also (in my view) extremely important in developing greater resilience and future proofing our communities.

I personally have been involved in providing accommodation and support services for people living in my homes(s) ,between 1992-1998 (Paekakariki), and 2010-2022 (Hemi Matenga). These people were all economically vulnerable, and would have been homeless or less suitably housed, even before there was a recognized 'housing crisis'. I have sometimes provided for people straight from Emergency Accommodation, and have provided accommodation for many others at short notice through word of mouth. I have lived and worked almost entirely on the Kāpiti Coast since 1991. Although my work has been largely (but not entirely) been based in education, my community interests are much broader than that.

The people I have helped (and continue to help) with accommodation and home-based support have included:

- A. elderly single people recovering from life threatening operations with residual physical and cognitive challenges
- B. young people leaving home who are building independent life skills
- C. new immigrants who suffer discrimination in our community due to their ethnicity and/or religion
- D. solo parents with young children with multiple needs (budgeting, cooking, life skills etc)
- E. climate change refugees with school age children and limited English skills
- F. immigrants who are being exploited and need extra assistance whilst negotiating with Immigration NZ and trying to work in less exploitative environments
- G. people with mental health challenges

**Given the scope of people listed above, you can see I am well aware of the need for warm, dry, safe, reliable, affordable housing in our community. I am also very aware of the need for wrap-around services for many of our more vulnerable people.**

I have also had to ask people to 'leave' when I could not personally provide the intense wrap-around support needed for a few individuals, but most people I have helped have stayed here for 'years' rather than 'days'.

I also have had longstanding interests in sustainable localized energy generation (solar power, and growing my own firewood coppices), and growing food locally. Growing and preserving home-grown food have been passions of mine since 1983.

Both these areas of interest are strongly tied to my interest in community resilience in the face of food insecurity and climate change. When I retire, I would like to further my involvement with community garden projects locally, and education of younger people in local food production and preserving techniques.

## **SUBMISSION**

### **1. GRZ -Px6 -Oppose (Area A: Hemi Matenga / Waikanae East)**

I oppose this provision in relation to the Waikanae East (Hemi Matenga) side of the railway tracks at Waikanae, for the reasons outlined below:

1.

#### **Hemi Matenga already has recognized connectivity issues with the rest of the Kapiti Coast.**

**There is only one public road connecting us to the rest of the Kapiti Coast, which traverses the Main Trunk Line.** Since Waikanae has been latterly included in the electrified KPL commuter line to Wellington, the connectivity issues have magnified exponentially. Commuter trains run half hourly most of the time in both directions (ie. Cross @4x per hour), also at slower speeds both approaching and departing Waikanae Railway Station. Sometimes stationary trains trigger the barrier arms for extended periods of time, let alone barrier arm malfunctions. Of course freight trains and long distance passenger services also traverse this crossing.

The rail crossing trapping residents on either side of the barrier arms is **3exacerbated by the Traffic Lights being triggered by the barrier arms.** Whole 'cycles' of traffic lights are cancelled for many minutes after the railway barrier arms are first triggered, lasting long after the arms have lifted. **This results in bottlenecks stretching sometimes in every direction, multiple times a day.**

The single public road that connects us to the rest of the Kapiti Coast was **never designed for the current population load, let alone the projected increase in population that Plan Change 2 decrees.**

The connectivity issues are very real because the vast majority of current users of the **one road access route in and out of Hemi Matenga need to access the West side for work, almost all community facilities, schooling and some social connections.** The population of Hemi Matenga is already increasing due to new housing developments.

It is not sufficient that there is a commuter railway station near us; the reality is, that this rail line only runs north-south (primarily south), and does not facilitate any East-West connectivity. The commuter railway line actually **impedes** Hemi Matenga's connectivity to food supplies, medical services, fire and emergency services, most schools, most community facilities.

2.

**The Health and Safety implications for increasing Hemi Matenga's population density before installing better East-West connectivity infrastructure are very negative**

Given the lack of life-sustaining/protecting facilities and services on the East side if we were prevented from being able to access the West side, it would be completely irresponsible to proceed with PC2 in its current form in Hemi Matenga.

If an **earthquake** were to down any part of the electric train lines, we would be trapped behind an electrified barrier.

If a **fire** were to occur in vegetation along the railway track, we would be trapped without fire assistance except via helicopter.

The fact that we are tenuously connected to Upper Hutt via the unstable and sometimes treacherous Akatarawa Road (23.7km) is small comfort. That journey takes 37 minutes in good weather. The Akatarawa Road is also likely to be closed due to **slips** in an earthquake, as it often is in very wet weather.

**Consider the following factors:**

**A.**

**Lack of access to emergency services**

**Hemi Matenga has always been reliant on fire and medical services from the West side of the railway line.** We have no ambulance station, no medical centre, no paramedic services, no fire engine sited on the East side.

**B.**

**Lack of access to life-sustaining services**

**We also have no supermarket, no petrol station, no EV charging station, and only one small dairy.**

**C.**

### **Vulnerable population clusters already exist in Hemi Matenga in the event of a fire**

Although there is apparently a locked gate over an 'emergency access' further north along the railway track, it is not easily accessible in case of a major emergency on the East side. The roads in that area are narrow and already easily clogged by school-based traffic.

The most **vulnerable high density areas** on the Waikanae East side in case of a large fire are already:

1. **Waikanae Primary School**
2. **Winara Bupa** eldercare complex
3. **Waikanae Memorial Hall** (during community and school events)
4. **Senior Citizens Rooms** in Utauta St. The latter are regularly used for Probus meetings etc.

Like much of Waikanae, we already have a significant proportion of the community who are of limited mobility, and not just in the large Winara Bupa eldercare complex.

**In all of the above areas, 6-storey buildings are planned under PC2. The level of fire risk mortality and morbidity would rise exponentially.**

The only emergency helicopter landing site near/within the East side residential area is the Waikanae School field, which is steadily getting smaller due to more classroom building projects.

**D.**

### **Fire Risk in Hemi Matenga exacerbated by Climate Change**

Our residential areas are also immediately adjoining the Hemi Matenga forest reserve and some private forest stands. **The risk of bush/forest fires with Climate Change induced droughts is projected to increase.** Hemi Matenga, even though it appears so 'close' to community facilities on a map, is likely to be prevented from

being assisted quickly, due to being cut off by the railway barrier arms. This has **clear Health and Safety implications for current (let alone future) residents**. There are many trees on residential properties that would further fuel a fire from the hillside towards neighbouring properties.

3.

### **School Zoning Issues**

**The current vehicle queues that already build on either side of the railway barrier arms are exponentially compounded every school day**, because all students in Waikanae Beach are zoned to attend Waikanae School (**current roll over 600**) in Hemi Matenga, over 5km away.

This is not because no school buses are available (they are also heavily subscribed), but because parents pick up children to attend after school activities etc, the vast majority of which are not within walking or biking distance of Waikanae School.

The large size of the school is disproportionate to the size of Hemi Matenga itself. This means Hemi Matenga cannot/ does not currently sustain or provide a large number of services that parents/families need to access in Paraparaumu or central Waikanae. The large size of the school also exacerbates connectivity and related Health and Safety issues caused by the railway line traversing the single public road.

The only other Waikanae-based primary school also has a roll over 600, and is also 'full'.

In addition, as there are no plans for another secondary school to be built on the Kapiti Coast, **all Hemi Matenga secondary students also need to cross the railway tracks by road (bus, car or bike) every school day**. The train does not take them near the existing local secondary schools, nor near Otaki College, even if they were zoned to attend Otaki College in the future. They are not within walking distance of any secondary school, and it currently takes a good 30+ minutes to bike from Hemi Matenga to Paraparaumu College. The current intersection over the railway track is still unsafe for cyclists.

**I seek the following decision from the Kapiti Coast District Council:**

**That GRZ-Px6 be amended to exclude Hemi Matenga until such time as Health and Safety matters are addressed regarding East-West connectivity issues.**

## **Possible Solutions**

**There are many possible solutions to the Health and Safety matters listed above.**

**GRZ-Px6 could be changed to apply to Hemi Matenga AFTER 3+ of the following infrastructure are built:**

1. A medical centre in Hemi Matenga
2. A fire station in Hemi Matenga
3. A vehicular overbridge gets built over the railway line
4. The railway line gets raised so that the sole public road can traverse underneath it
5. A gondola runs up from the Waikanae Central area to several stops along Hemi Matenga, that can ferry goods, passengers, mobility scooters, bicycles
6. A mobility-scooter / cycle/ pram friendly overpass gets built over the railway tracks with good connectivity to bike lanes
7. An underpass gets built under the railway tracks with good connectivity to bike lanes
8. The Traffic Light cycles do **not** get cancelled automatically as soon as the barrier arms are triggered
9. A 3<sup>rd</sup> Waikanae-based primary school be built (and the school zoning changed).

## **Re #9 3<sup>rd</sup> school site**

Possible 3<sup>rd</sup> Waikanae-based primary school zone sites are:

- The Ngarara subdivision
- The rural land immediately north of the Charles Fleming eldercare complex

These school sites both would reduce the need of 100s of students and their families to travel by car and bus to traverse the railway track to Waikanae School every school day. These two sites would cater better for the Waikanae Beach, Peka

Peka and Waikanae North communities, and the existing Waikanae School could then cater primarily for people who can safely walk and ride to school using active transport (Hemi Matenga and central Waikanae).

### **Re #5 Gondolas**

An electric powered gondola system is a very future-focused solution. It potentially provides age-friendly, disability-friendly, emission-friendly transport options to people on the East side, without affecting train services or other modes of transport negatively.

It is vital however, that such a system be designed, designated, and implemented **before** even 3 storey buildings be built on the East side, so as to plan gondola routes well in airborne spaces above this community.

### **Relevant section of KCDC Section 32 Report, p141**

#### **5.2.4 Giving effect to Policy 3 of the NPS-UD**

The approach taken by PC2 to giving effect to policy 3 of the NPS-UD is based on the existing hierarchy of centres zones contained within the District Plan49. The centres zones provide for commercial activities (such as shops, offices and other places of employment) and **community services** (such as **healthcare services**, libraries and **other community facilities**) in areas located throughout the District, and the hierarchy of centres zones recognises that larger centres, such as the Metropolitan and Town Centre Zones, are intended to serve broader parts of the community, whereas the **Local Centre Zone is primarily intended to serve local neighbourhoods. The level of intensification proposed by PC2 is based on, and reinforces, the relative position of each Center zone within the centres hierarchy.**

**I submit that Hemi Matenga is not yet connected well enough to existing services and facilities, to warrant being appropriate to such a level of intensification as proposed in PC2.**

**Furthermore, the National Policy Statement on Urban Development 2020 requires us to make changes that are fitting to their objectives and policies. The highlighted policies and objectives below are ones that are relevant to all the points raised above regarding Hemi Matenga.**



# Relevant Sections from the National Policy Statement on Urban Development 2020 pp9-11

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Part 2: Objectives and policies

### 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.

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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.

Objective 7:

Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.

Objective 8:

New Zealand's urban environments:

- a) support reductions in greenhouse gas emissions; and
- b) are resilient to the current and future effects of climate change

### 2.2 Policies

Policy 1:

Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: have or enable a variety of homes that:

- (i) meet the needs, in terms of type, price, and location, of different households; and
- (ii) enable Māori to express their cultural traditions and norms; and

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- (iii) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (iv) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (v) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (vi) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
- (vii) and support reductions in greenhouse gas emissions; and
- (viii) are resilient to the likely current and future effects of climate change.

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## **SUBMISSION**

### **2. GRZ-Px6 Oppose (Area B: Whakarongotai Marae view shaft)**

It is important that Whakarongotai Marae be able to sight its maunga (mountain) from its site.

Whether they choose Hemi Matenga or Kapakapanui as their maunga of choice, is their choice. For cultural and spiritual reasons, they need to be able to connect with local land/sea forms that are most relevant to their marae and turangawaewae. In the case of Whakarongotai Marae, it is the spiritual connection to their maunga (mountain).

Therefore, GRZ-Px6 needs to *not* be implemented along the view shaft to either maunga from Whakarongotai Marae.

**I propose that GRZ-Px6 be amended so as to prevent high rise high density housing initiatives within the view shaft between Marae and culturally important lands or waterbodies eg. Between Whakarongotai Marae and relevant maunga.**

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## **SUBMISSION**

### **3. GRZ -Rx6 Support (High rise buildings built above large existing carparks and retail areas first)**

I support this rule being applied to building apartment blocks above central carparking areas and retail areas in particular because:

- A. Large car parking areas for supermarkets and malls already are 'asphalt', relatively tree-less, and very centrally located
- B. It is completely architecturally feasible to build multi-storey apartment complexes above existing carpark areas, without disturbing ecosystems, amenity values etc
- C. All the objectives of the National Policy Statement on Urban Development 2020 are met by such building projects
- D. There are no existing food production areas that are compromised by high-rise buildings blocking sunlight, if existing commercial areas are prioritized
- E. Existing retail and carparking facilities will not be lost by building above them. Indeed, retailers will benefit.
- F. There will be no negative effects on emission reduction plans, nor will there be loss of canopy cover, by building on top of existing 'asphalt' or existing buildings

**I think it is just commonsense that extensive highrise apartment structures that provide affordable housing be built in central town areas, especially above existing carparks and retail space.**

Other urban areas are trying to increase their green canopy areas, to help mitigate the effects of Climate Change. We should be proactive, and protect existing canopy cover in our urban/suburban areas whilst

prioritizing intensification of housing in already-highly-concreted urban town centres.

**I propose that the Kapiti Coast District Council amend GRZ-Rx6 so as to prioritise the intensive building of affordable housing in multi-storey buildings above existing centrally located carpark areas and retail spaces.**

## **SUBMISSION**

### **4. GRZ-Px8/Rx3 -Support (Marae Takima)**

I support designated Marae areas having less intense urban density zones.

There are a number of spiritual and cultural reasons why Marae need more 'space' and more privacy.

**I propose that GRZ-Px8/Rx3 be retained and strengthened.**

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## **SUBMISSION**

### **5. New Matter: Community Gardens and Allotments**

The Kapiti Coast District Council needs to make planning provision for 'Allotment' sections and Community Gardens in every suburb, particularly in areas where there is adequate sunshine, water supply, and preferably good soil and/or room to site composting facilities.

These types of land-use arrangements have been in place for many years overseas, and are increasingly valued worldwide in the face of increased population pressures, food insecurity and the loss of valuable food-producing land to urbanization.

With the proposed suburban intensification, the Kapiti Coast residents will lose many garden areas either literally, or effectively (due to loss of sun affecting plant growth).

Many people chose to live on the Kapiti Coast because of its climate and (sometimes) because of its good growing conditions. Gardening is a very popular pastime amongst Kapiti Coast residents (and many other NZers too). It has the following benefits:

- A. Physical activity
- B. Sense of emotional wellbeing
- C. Spiritual replenishment
- D. Low food miles
- E. Local sustainable supply of food
- F. Greater control over chemicals used (if any)
- G. Greater resilience in the face of climate change and global insecurity

I can only assume that the planners who have proposed PC2 to help improve the cost and availability of housing have completely forgotten that the residents of the Kapiti Coast also have other needs and priorities, like affordable sustainably-grown food, and local community resilience.

People who live in apartments or townhouses may also want to be able to be engaged in local food growing initiatives. People whose properties are now so shaded by 3-storey or 6 storey buildings nearby may also want to be able to continue gardening in local plots elsewhere.

### **Allotments**

Allotment systems are great at providing leased land plots on areas that otherwise are unsuitable for housing eg. Immediately adjacent to railway tracks.

Small lockable sheds suitable for garden tools would be allowed on each allotment, along with wind break structures up to certain heights.

The allotment blocks would be leased to families or individuals who live nearby.

### **Community Gardens**

**Land should be set aside by the Kapiti Coast District Council for local Community Gardens and Food Forests**, particularly on sites that *cannot* be 'built out' for sun by immediate neighbours. This protection needs to be guaranteed by town planners. I suggest that one site every 1-2 kilometres be put aside, and protected under legislation, from being 'built out' of sun.

**Being able to grow and disseminate fresh food locally is a vital community-enhancing resource that needs to be prioritized more.**

Being involved in local Community Gardens adds to people feeling like they can 'make a difference' and 'belong', both of which are vital to a sense of optimism, resilience, connectedness and wellbeing.

**In this era of increasing climate change, the need to reduce carbon emissions, and the threat of world instability, it is even more vital that we prioritise local resilience. Food must be regarded as a crucial part of this.**

**I propose that a New Objective and New Policy be inserted into the PC2 that provides for the following:**

**1.**

**Leasehold Allotments on 'spare' sunny land (that is otherwise not fit for housing, abandoned, or possibly subject to weeds infestation and litter dumping) be developed and protected in every suburb, to**

facilitate community participation in gardening and local food production

2.

Sunny land be set aside at 1 -2 kilometre intervals for Community Gardens and Food Forests. This could involve:

A. The Kapiti Coast District Council buys private sites as Public Works, and protect them from being 'built out' by height covenants on neighbouring sections and/or

B. The Kapiti Coast District Council encourages and facilitates local initiatives to develop Community Gardens on 'public' land such as council berms

3.

The Kapiti Coast District Council prioritises the local production of food by community groups and individuals over other public amenity values eg. Mowing council berms

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**SUBMISSION**

**New Matter: Existing Solar Power infrastructure on private properties**

The Kapiti Coast District Council is apparently prioritizing carbon emissions reduction. This is very laudable, but **the consequences of building 3-storey, 4-storey or 6-storey buildings near to existing solar power generating infrastructure completely contradicts the KCDC's aim to reduce carbon emissions.**

It is clear and logical that high buildings will reduce sun falling on existing neighbouring buildings and land.

There are no protections in PC2 to safeguard against the climate change and economic consequences of solar power generating systems having their sun reduced or blocked completely.

It is completely iniquitous that people who have prioritized low emissions and energy self-sufficiency in the interests of living responsibly on this planet, be penalized by neighbouring properties building out their sun. This is not just 'an amenity value'.

**I propose that any developed of a 3+ storey building that negatively impacts on a neighbour's existing solar power system compensate that negatively affected property in the following ways:**

- A. Pay compensation for the value of the solar power generating and/or storage system to the owner of the negatively affected property and**
- B. Install a solar power generating and storage system on their new high-rise building, and hook the negatively affected property up to their solar-generated electricity**

**I propose that urban intensification be prioritized in areas that have the least impact on existing Solar Generation systems, and existing food production areas.**

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**SUBMISSION**

**New Matter: Climate Change Mitigation and Ecological Protection regarding existing mature trees (Kapiti Island-Hemi Matenga Reserve) bird corridor**

Climate Change Mitigation



It is well-known that existing mature trees provide valuable carbon sequestering qualities.

It is completely contrary to the Kapiti Coast District Council's stated aims and objectives regarding climate change and emission reduction, that local mature trees be removed without an excellent reason for doing so. It is not sufficient to just plant a few shrubs or grasses in their place.

### Ecological Protection of Bird Corridors

PC2 does not include any safeguards for local mature trees, particularly exotic trees. Not only do mature trees provide shade and cooling canopies for humans in an increasingly warmer climate, but they provide food and shelter corridors for our birdlife.

Waikanae is renown for its mature trees, that provide a necessary ecological corridor between Kapiti Island and Hemi Matenga reserve.

PC2 does not provide any ecological protection for the ecosystems (ie. the mature trees) that make up this vital bird corridor. It is well known that destroying corridors of food and shelter sources puts bird populations at risk of inbreeding and starvation.

There are many parts of Raumati and Paraparaumu that do NOT have so many mature trees, and do not perform this Bird Corridor ecological function. These areas should be intensified **before or instead of** areas with many mature trees.

It is completely inappropriate values-wise to only prioritise the needs of our vulnerable people, but in doing so, completely disregard ecological and carbon-emission goals.

**I propose that the Kapiti Coast District Council insert a provision into PC2 that protects the Waikanae ecological bird corridor between Kapiti Island and Hemi Matenga, by making the removal of mature trees (including exotic trees) over 40cm in diameter a Notifiable matter.**

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Conclusion

As you can tell from the effort I have put into this submission, I feel passionately about the Kapiti Coast District, its people (both current and future), its ecosystems, its resilience and self sufficiency. Accordingly, **I wish to speak to this submission in person.**

While I generally support the general aims of the PC2, I hope I have demonstrated in my submission that certain areas are much less well suited to the intensification proposed, for Health and Safety reasons, cultural, resilience and ecological reasons.

I look forward to nuanced intelligent future-orientated planning that takes whole community systems into account in a holistic way. Affordable housing will not on its own make us a safe, resilient, future-focused community. **Please let us use common sense first, intensively developing already urbanized well connected areas in central town zones first, and building necessary infrastructure *before* making our less connected areas more unsafe.**

We need to also prioritise good management of our food-producing land and mature tree zones, neither of which can be ‘manufactured’ in a couple of years. Our communities will increasingly rely on local food production, and our local ecosystems are priceless in combatting the negative effects of climate change. **We are guardians of our natural taonga, and cultural, physical and spiritual needs are also valid human needs.**





**From:** [Malu Jonas](#)  
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**Date:** Wednesday, 14 September 2022 4:24:57 pm  
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Hello,  
Attached is my Submission on the PC2.

I wish to speak to this submission too, thank you.

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