29 September 2022

Hamilton City Council
Private Bag 3010,
Hamilton 3240

Attn: City Planning

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SENT VIA EMAIL: haveyoursay@hcc.govt.nz

Tēnā koutou

Dear Sirs/Madams,

RE: SUBMISSION ON HAMILTON CITY COUNCIL DISTRICT PLAN CHANGE 12 – ENABLING HOUSING SUPPLY

1. I submit on the Hamilton City Council District Plan Change 12. Thank you for the opportunity to provide this submission.

2. I wish to be heard in respect of this submission. If others make a similar submission, I am prepared to consider presenting a joint case with them at a hearing.

3. I am not a trade competitor.

4. My submission is framed as a resident, owner and occupier. 10 Taniwha is proposed to be zoned Residential High Density under PC12 and as an owner who is directly affected.

5. My contact details are:

10 Taniwha Street Frankton Hamilton 3204
laurakellaway121@gmail.com
027 4751715

SUBMISSION ON PROPOSED PLAN CHANGE 12 HAMILTON CITY COUNCIL

Kia whakatōmuri te haere whakamua:

'I walk backwards into the future with my eyes fixed on my past'

This whakataukī or 'proverb' speaks to Māori perspectives of time, where the past, the present and the future are viewed as intertwined, and life as a continuous cosmic process. Within this continuous cosmic movement, time has no restrictions – it is both past and present. The past is central to and shapes both present and future identity.

My standing place is Frankton. My mountain is Pirongia te aroaro O Kahu**.** My awa is Waitawhiriwhiri.

I am a long-term resident of Frankton and Maeroa, and have lived in Taniwha Street for over 28 years.

In my view respecting the past and present, of neighbourhoods, is very important in new proposals for intensification in residential areas. But it is not just about scheduling historic heritage.

The potential impacts of the Hamilton City Proposed Intensification under Plan Change 12 will likely include ongoing demolition and removal on some of Hamilton's residential suburbs being in a state of construction transition for a long time, as result of hasty implementation. Some of this is already underway in a number of eastern and northern suburbs. Other old existing neighbourhoods, facing new clearance policies, will be destroyed. This is acknowledged in some of the short precise of the current proposal.

PC12 documents mentions good quality design but does not have a robust integrated master plan or indeed objectives, policies and rules that support good quality environments, that retain the past and present, with controlled developments that make maintain strong neighbourhoods.

The potential impacts on neighbourhoods is insufficiently addressed and appears to focus on a new model of redevelopment [previously known as clearance], along with infill.

This new plan change proposal has not in my view been carefully considered or integrated as part of a wider agreed community's plan- it is piecemeal, rapid, has been poorly consulted on, and includes extremes that remove existing residential communities. The Medium Density Residential Zone (MDRZ) is a blunt standardised tool that has forgotten basics which communities expect- sun, privacy, quality living environments, and not to be stuff with parking issues.

The evidence that housing will be provided for all levels of the community by the MDRZ approach remains an unknown.

It is difficult to work through what is the actual housing shortage and if new developments will actually improve the long term, as many cannot afford rentals let alone a home.
The issues are much more complex and require careful consideration with the locals.

'Urban renewal and intensification' in the past has not necessarily been the solution, but has displaced existing communities, and may in more recent times include the financialization of housing, which has been seen in developed cities in other countries by the UN.

Clearing existing neighbourhoods has a long history including in New Zealand. There is no process in the PC12 that addresses this significant neighbourhood impact on people.

Whether the land is cleared by government, council or developers the result is the same- loss of existing neighbourhoods and structures that support people- intangible things not able to be written into a rule book which includes the MDRS with minimal design standardised approach.

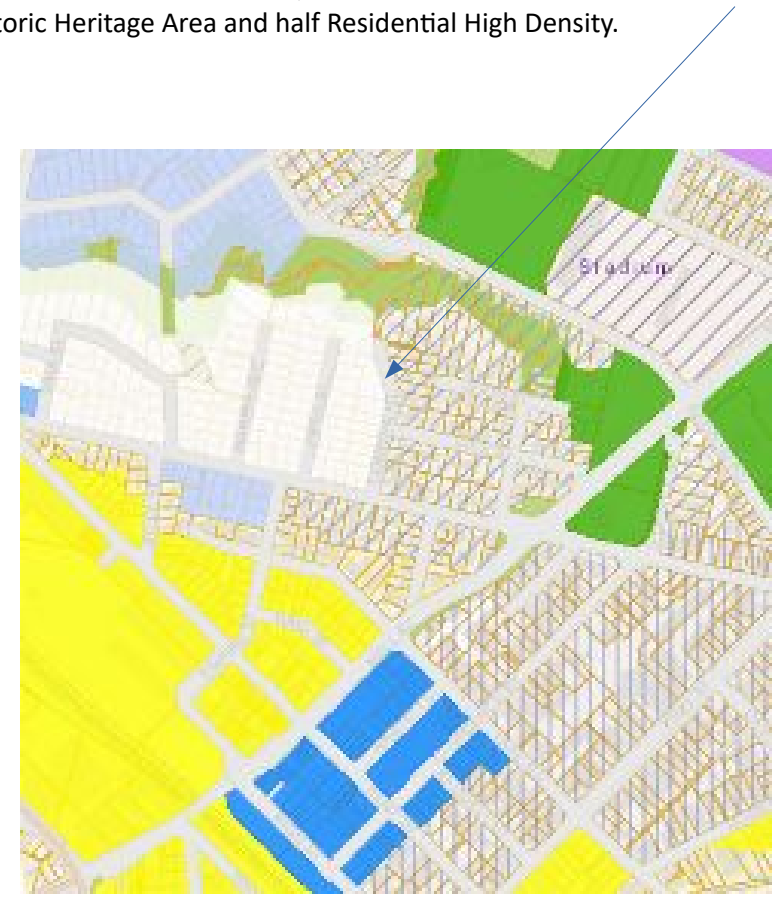
Words like 'character' and 'neighbourhood' remain in PC12 but neighbourhoods are not planning outcomes, they are made by those who live in a particular place, or who are welcomed and integrate into a community or may be lucky to have generational roots- a turangawaewae.

The MDRZ and Plan Change 12 will likely impact on many neighbourhoods in Hamilton, and have long term consequences that are potentially hard to fix. Alternative locations and options within the existing city have not been discussed with the community, before selecting residential neighbourhoods to removed or be highly modified.

Everyone has the right to a good place to live- but it is how and where you do this. Who do you displace in order to do this? If Hamilton was a clean slate – i.e. no people and no places then this is would potentially work as an experiment of creating a new sense of place. But what happens when the place is inhabited?

The proposal is piecemeal and has been poorly communicated to the neighbourhoods. It gives lip service that the 'impact' will be greater on a few for the good of more?

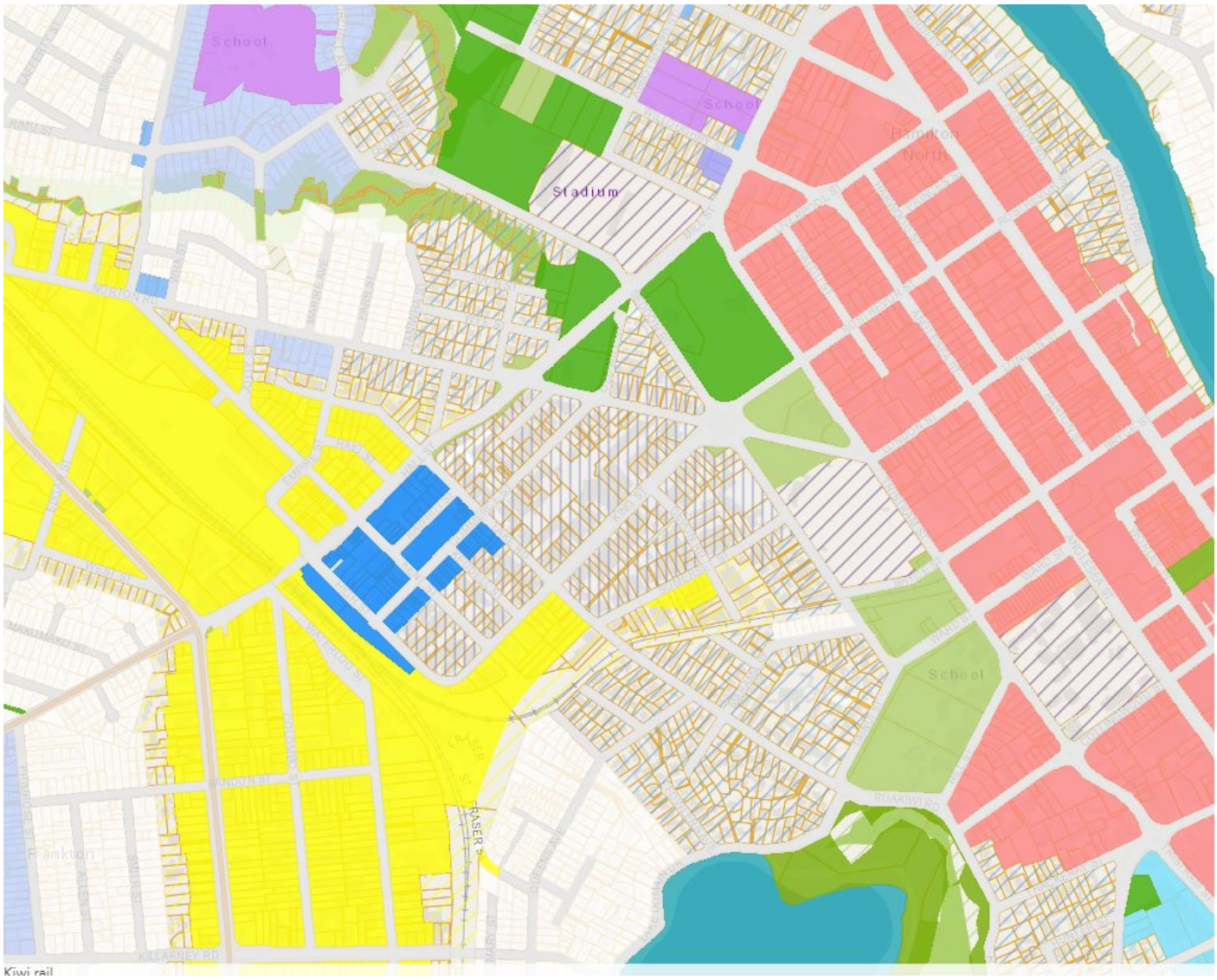
Below is an insert of the Frankton East suburb, under PC 12. The arrow shows Taniwha Street, which is proposed as half Historic Heritage Area and half Residential High Density.



The Proposed planning map below shows large parts of Frankton zoned High Density Residential Zone. This area is situated between an Industrial area (marked in yellow) and the Central City Zone to the east (shown in pink).

This proposal destroys almost all of the old residential areas of Frankton East, apart from two and a half street which may be made historic heritage area.

Whilst the central city zone is nearby, it is not directly adjoining and Frankton is not walkable to many of the key city facilities such as the bus station. The walkable catchment needs to be reviewed in this area.



For those in the proposed high-density zone such as parts of Frankton it takes away sense of place, it takes the past and present and certainly does not provide a positive future. The premise is they should live, take the money, move into a retirement home or put up with the uncertainty, the demolition, relocation, noise, dust, then the overshadowing and issues of the new environment for a year or two or a decade.

Our neighbourhood in Frankton East, proposed for High Density six storey and above apartment blocks, is not empty or vacant. It should not be seen as suitable for market driven intensification that far exceeds

current and historical land uses. It is vastly different to the current environment, made up low level residential dwellings.

In selecting Frankton East for Residential High-Density Zone while it may be close to facilities it is also a place that has had decades of underinvestment and continual cutting into.

In the last fifty years- part of Frankton was cleared for the industrial estate of Hamilton, and then for the overbridge bypass for those moving from the east to Dinsdale in the late 1970s. And then again more recently the ‘clearance’ for the Mill Street main East to West bypass. There were no gains for this neighbourhood, cut in half, and no benefits- just rearrangements of park facilities and four lanes going through the centre of our suburb. Yet the Frankton East neighbourhood has survived and has for over 120 years supported itself and retained its character.

The current HCC proposal is not in my view inclusive of neighbourhoods and the land is not vacant. The 3×3 storey high MDRS requirements is not in my view a good solution for Hamilton. Homing people is complex and needs innovative community-based solutions. The issues are long term, assisted by successive governments who have failed to provide quality social housing, followed by local bodies who sold off council housing.

While loss of parking and removal of good design criteria is the result of a government policy, this does mean you should support a poor model that will likely have generational impacts, and unlikely to strengthen existing communities that can support well managed change.

Being able to stand in your place, have a strong sense of place, of existing neighbourhoods who can support each other, who hold the past, live in the present and move to the future are surely one of the keys.

In my view long agreed controls that allow neighbourhoods to be thrive, have quality spaces, and relationships, and to have a voice are removed in the current proposed process.
Finding those ‘empty spaces’ within the city that can take good quality housing developments is possible, that tie in beside existing neighbourhoods.

The residents in Frankton already have experience of loss of community facilities- a hall, a library, and direct access to their suburban centre by the equivalent of a motorway. More recently demolition has become common as homes in parts of Maeroa and Forest Lake are rapidly removed and replaced with infill and apartments, without a cohesive plan to retain neighbourhoods. Parking is already an issue with 2 storey developments.

'Amenity Values' is defined under the Act to mean those 'natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes' (Section 2). Existing amenity values (s7 RMA) are not protected in PC12 for our residential area, and adverse effects are not addressed, and controlled within PC12 in the proposed redevelopment within our existing neighbourhood.

Sustainable management (Part 2 RMA) has not been addressed. Demolition of existing neighbourhoods and buildings is not sustainable management. Sustainable management allows development that integrates environmental, social and economic objectives. It does not enable our community to provide for our well being.

The following concerns are not addressed adequately in the chapters of PC12.Issues include but are not limited to:

- Universal application of the MDRZ within the city is inappropriate and will likely have significant impacts on existing communities, and does not support a range of good quality. Council should challenge the requirements.
- The MDRZ actively promotes a 'backyard infill' type of development, which limits more significant and higher quality 'comprehensive intensification, which would benefit Hamilton City.
- Over shadowing of neighbouring properties is a significant impact on existing homes. Greater built height is to be developed adjacent to a single level or two storey houses with over 21 metres in Residential High Density Zone and up to five storeys in Medium Residential. Shading and lack of sunlight will be a significant issue along with wind.
- Privacy control has been substantially removed at government level and it is no longer important to have sun and daylight in our residential environments
- The Chapter on Urban design of the District Plan sets objectives and policies but there are no rules (within this Chapter) to support good urban design practice.
- Use of the word 'character' in PC12 is not backed up with information on what the specifics character of existing neighbourhoods, or associated controls to retain character or sense of place
- Character values are acknowledged in Hamilton yet removal of character areas zone and rules was not explained in Plan Change 9, nor adequately in PC12. Character forms the base of many residential areas but these needs describing and in some cases controls. Other councils are retaining character areas. If proposed historic heritage areas do not proceed there is no fall back for the existing extents of character areas and proposed historic areas.
- 'Neighbourhood urban character' is within the objectives of the new Residential Zones, but there are no area plan models developed based on this concept, with these neighbourhoods.
- Existing non statutory community plans for Frankton and Hamilton East have been ignored.
- There are no new design guidelines provided in PC12.
- There is no maximum heights in the Residential High Density Zone.
- The selection of existing established neighbourhoods for clearance for high density has been poorly communicated and there is no evidence that this aggressive form of removal is acceptable and to be well controlled.
- Amenity values (s7 RMA) are not protected for our neighbourhood.
- Adverse effects, to our community which include but are not limited to noise, demolition, dust, and living within a commercial scale construction block have not been addressed under RMA
- Removal and or demolition of existing homes, in good condition, and of our community is not in my view sustainable management (Part 2 RMA).

I OPPOSE THE FOLLOWING:

- The proposed plan changes PC 12 housing intensification, and seek a considered communities-based consultation and review
- The proposed Residential High-Density zone over Frankton East block which includes Wye Street, Torrington Avenue, Taniwha Street, Norton Road to Wha Street, and seek a more appropriate review of the existing neighbourhood and how new housing is incorporated while retaining its existing characteristics and buildings. I seek a lower density for our specific neighbourhood which recognises the existing community and character including historic heritage, and a height limit in this zone chapter.

- Blanket introduction of MDRZ 3×3 high developments city wide, when the MDRS requirements do not have good quality design as a base for the site, the neighbours and the neighbourhood.

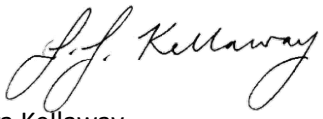
I SEEK THE FOLLOWING:

- An integrated master plan that looks cohesively at all of Hamilton, across all zones, and how it is developing based on its existing neighbourhoods, and in non-residential areas that can take change without 'clearance and poor infill outcomes'.
- Stronger design rules that include good design outcomes and include privacy, sun, warm living outdoor spaces, control of over shadowing, and provide quality, within the Urban Design and Residential Chapters.
- Urban design standards and rules that require review by the Urban Design Panel for all residential developments (not only those with 4 or more units)
- integration of geology including building on the sides of gullies, including the earthquake faults, and how this effects these places for future urban design
- Rules that address wind on sites and down streets in high density zones
- Rules that make inner central city apartments good quality places to live, including privacy, access to sun and good ventilation.
- Provision of more accessible units across all residential types including the 3×3- as 24 % of the population in 2020 is said to be in this category. This should be about accessibility for all.
- Mixed use zoning throughout the city including residential in industrial and areas that are being left as industries move to the far north and east
- intensification first in the inner central commercial city and in vacant areas, not existing residential neighbourhood
- Neighbourhood urban character area plans before significant intensification takes place, undertaken with the specific neighbourhoods
- Correction of details within the section 32 report - North of City Area plan. The plan should be amended to 'East of Norton Road' as Frankton East, and as part of Frankton suburban area. It is divided by a very large geographical gully. The Stage 1 extent should be amended.
- include objectives and policies on how existing neighbourhoods are to be protected from the ongoing cumulative effects.
- Include in the Infrastructure chapter protection of historic streets and historic landscape.
- Rule to protect the drip line of existing trees that are keep by developers so not covered in concrete
- Rule for cumulative assessment of impacts on streets and neighbourhoods when more than 10% of the properties are in 3×3 high buildings format. To be completed by council and resulting character-based street plans
- Infrastructure rules which allow council to pre-plan appropriate neighbourhood character streets with both trees and parking bays, preferably before 10% intensification [height and density] change.
- Retention of Character chapter but amended as an overlay zone
- Existing use rights rule for residents in the Residential High Density zone to allow for the activities that were permitted in the operative district as at 01 July 2022 in order to have some reassurance of continued use as a residential property while in existing ownership.
- A rule for Height limits in Residential High Density that are reasonable for established residential areas.
- Protection of amenity values under s7 RMA and adverse effects of the proposed clearance of the suburb,
- Sustainable management (Part 2 RMA) of our existing residential area.

I SUPPORT:

- intensification in principle of apartments in the inner central city [commercial], but seek improved rules for providing quality living environments
- retaining existing site trees, but include a lower size than 6m, and include both exotic and native trees
- mixed use zones (which include apartments) in non-residential areas that are close to transport and facilities
- a community-based approach to planning changes within the City.

Yours faithfully



Laura Kellaway