

RMA FORM 5

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:

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2. This is a **submission** on the **Proposed District Plan** for Porirua.
3. I could not gain an advantage in trade competition through this submission.
4. I wish to be heard in support of my submission, and may seek to introduce expert evidence at some point in the process
5. I will consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Please complete section below (insert additional boxes per provision you are submitting on):

1. The specific provisions of the proposal that my submission relates to:

1. Compliance with the Local Government Act s.10 and the National Policy Statement on Urban Development 2020 (NPSUD) including:
 - a. Lack of a demographic framework for estimating ‘sufficient’ housing for relevant population groups
 - b. Lack of residential pathways for the ageing population and the consequent effects on housing available for other age cohorts
 - c. Lack of plausible measures to achieve affordability for renters and owner-occupiers in all age cohorts and market segments
 - d. Lack of an identifiable and discrete set of rules to enable communities to optimize intensification and the life-cycle of their suburbs.
2. Intensification
 - a. Energy and water efficiency including:
 - i. Identifying implications of achieving net-zero carbon in the District and interaction within the Region
 - ii. Implementing transitional arrangements to exclude industry from active travel zones that relate to public transport hubs.
 - b. Locality design and redesign including:
 - i. Enabling decision making that includes committed residents, potential residents, their advocates and entrepreneurial builders and developers (see also 1d above)
 - ii. Addressing the provision and governance of reserves and common land in neighbourhoods.
 - c. Requiring that the case for any Future Urban Zone (FUZ) prove that intensification within the urban boundary is not an option for meeting housing need.
3. Redevelopment, FUZs and Future Regeneration Zones including:
 - a. Full off-setting of urban environmental impacts and costs during the term of the District Plan
 - b. Reviewing and revising the criteria for economic ‘feasibility’ to reassess the scope for redevelopment using forward looking models for providing housing
 - c. Rezoning the Northern Growth Area as a Future Regeneration Zone

2. Do you: Support? Oppose? Amend? Observe?

I observe that the Housing and Business Development Capacity Assessment (HBA) (also referred to as the Housing and Business Land Capacity Assessment) that is referenced by the Porirua City Council (PCC) does not comply with important aspects of the current NPSUD. The implication seems to be that PCC is leaning strongly towards a gross generic ‘solution’ to housing shortages led by developers with dominant positions in small ‘markets’ producing a narrow range of housing. The evident bias in that model is to be offset by interventions by the Crown and Ngati Toa that seem to lie outside the scope of what is regarded as ‘commercially feasible’ (see the framework referenced in Section 4). Given the evidence of past performance or lack of influence of all those parties, provided most recently in evidence to the PC18 Hearing Panel, a more purposeful and competitive environment for housing (re)development is required.

3. What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete? Explain? Reorient?

The NPSUD promotes a somewhat contradictory framework for urban development. Nonetheless it provides the Council, that is to say the Mayor and Councillors having regard to their constituencies, with an opportunity to explicitly respond to the types of housing required by residents of Porirua in the foreseeable future.

I am seeking:

An HBA that addresses the NPSUD 3.23(2) in terms that are relevant for the District, read with reference to the concept of 'sufficient' (e.g. Resource Management Act (RMA) s.31(aa)) and having regard to circumstances in which 'development' can be read as redevelopment.

Rules that ensure the findings of a revised HBA are implemented as the cumulative effects of successive resource and building consents to create 'well-functioning urban environments' (NPSUD 2.2 Policy 1(a)(i)) at the neighbourhood level .

An indication of how the mandatory monitoring of housing needs and markets will be framed and feed into applications for and decisions related to resource and building consents and other decisions by PCC.

An indication of how equitable 'competition' will work in the District and displace anti-competitive practices such as the proposed MoU strategy.

The comments that follow relate to each of the numbered points in Section 1 above.

1. Support for proposals based on the four dimensions of well-being and explicit reference to rules that enable democratic decision making about the mix of housing in neighbourhoods including:
 - a. A demographic framework for estimating and monitoring what constitutes 'sufficient' housing for relevant population groups
 - b. Reference to and provision for residential pathways related to ageing
 - c. Plausible approaches to supporting affordability for renters and owner-occupiers in all age cohorts and market segments
 - d. An identifiable and discrete set of rules to enable communities to optimize intensification and the life-cycle of their suburbs.
2. Intensification:
 - a. Energy and water efficiency
 - i. Off-set provisions based on aggregated measures of impact to support a continuous trend toward net-zero carbon in the District and interaction within the Region
 - ii. Transitional rules and provision to facilitate the exit of industry from active travel zones
 - b. Locality design and redesign:
 - i. A clear intelligible set of rules and procedures that enable decision making that includes committed residents and potential residents, and entrepreneurial builders and developers (see also 1d above)
 - ii. Rules relating to the creation and governance of reserves and common land
 - c. A requirement that any application for housing on a Future Urban Zone (FUZ) is supported by evidence that intensification is not an option
3. FUZs and Future Regeneration Zones:

- a. Designated reserves and regeneration zones that provide a full off-set of all residual urban environmental impacts, associated with improved public access to reserves within the active travel radius of public transport hubs to off-set any restrictions on activity implied by intensification
- b. Revised criteria for economic 'feasibility' to reassess the scope for redevelopment using forward looking models for providing housing
- c. Rezoning the Northern Growth Area as a Future Regeneration Zone.

4. Reasons:

One way to interpret the PCC approach to District Planning is to note: the evident enthusiasm for real estate opportunities; a partial acknowledgement of the need for sustainability and a response to climate change; and, the absence of any attention to the specific housing needs that exist or will arise in the next 20 years.

There is already sufficient land to house the population of the region over the next planning period (HBA pp. 7, 34-35). More pressing priorities are (a) coming to terms with demographic trends and (b) enabling communities to adapt to the 'life-cycles' of suburbs and households. As far as I know these priorities were not addressed in the general public consultations, but might have been discussed with residents associations.

PCC is inflating and bringing forward the demand that is sought in the 'growth strategy' segment of the framework below.

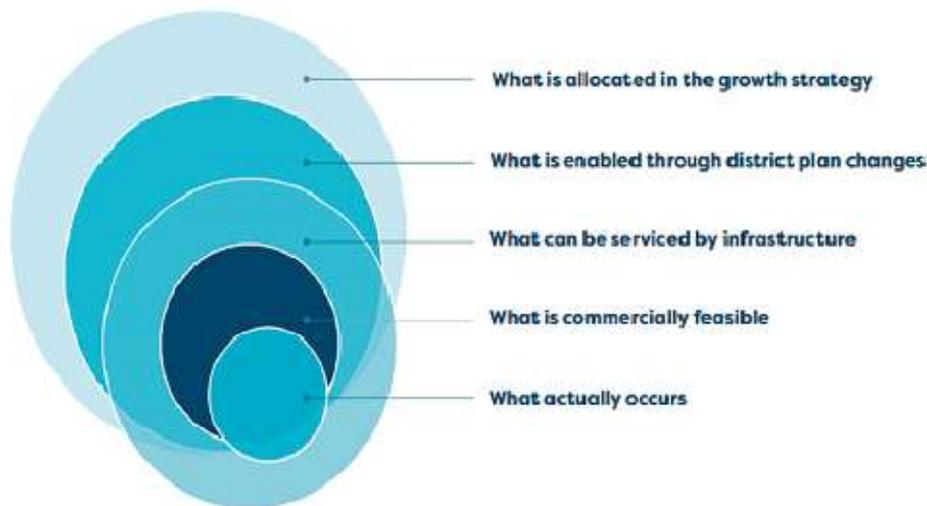


Figure 4.18: Different levels of development capacity

The main feature of the proposed 'growth strategy' is the anti-competitive use of MoUs with dominant owners, Aotea, the Landing and Plimmerton Farm being recent examples of that approach. Given the dominance of the lead participants in these initiatives it is very unlikely the strategy will led to actual over-supply to depress price increases (NPSUD 3.22). These developers are controlling markets that are driving up the overall cost of housing.

The Council would serve its statutory purpose more effectively if it began at the core of the framework (above) with a focus on what will actually occur having regard to the well-being of all residents and prospective residents. This implies the Council will, among other things:

- Examine and revise the assumptions defining commercial feasibility, noting that the current measures of feasibility are entirely backward looking

- Create conditions that facilitate the entry of forward-looking entrepreneurs willing to engage in neighbourhood redevelopment and intensification

Estimate explicitly the level of housing need that lies outside the scope of what is commercially feasible and facilitate responses appropriate to neighbourhoods and villages

Take for example ageing in the population. There are other, perhaps more pressing, priorities such as those without homes at present – a group that seems to be unacknowledged in the current HBA. However, the 65+ population contributes to rigidities in the allocation of housing and, under present conditions, will generate increasing costs, including opportunity costs, in the District and Region. This will have effects across all generations.

As far as I can tell the inflated population figures used by PCC pay insufficient attention to the short and medium term implications of the changing age structure. A relevant projection from Stats NZ is:

Population change 2018-2038 – medium projection		
Age cohort	Region	District
0-14	(4,600)	(1,700)
15-39	500	(1,400)
40-64	(700)	(200)
65-69	7,870	1,330
70-74	9,970	1,420
75-79	13,680	1,680
80-84	11,340	1,510
85+	12,280	1,410
Total	50,340	4,050
Rounded	50,400	4,000

From 2038 the projected numbers in the older age groups will also begin to fall.

How will the PCC respond to this situation? The NPSUD requires a high frequency of monitoring that could easily become onerous or pointless. That need not be the case.

There is some initial experimentation at the Landing and in the Castor Loop, and with the potential for more on Plimmerton Farm and in Titahi Bay. If the results of these and subsequent initiatives are incorporated into ongoing monitoring reports that information could provide a basis for continuous improvement in local urban design provided there are rules that allow for that to occur. Hence the suggestion above that PCC enable democratic decision making informed by local experience by including a small, intelligible set of rules in the District Plan that create a process that enables communities to respond to actual housing need, potential for improvement, and global, national and local priorities.

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 dpreview@pcc.govt.nz

Signature of submitter



20 November 2020