

Chair and Commissioners
Hearing Panel
Proposed Porirua District Plan

Responses to arguments that rebut points in my original submission 184

Introduction

1. Two elements of my original submission have been rebutted. Officers believe my recommendation that the District establish Future Regeneration Zones to complement FUZ is unnecessary because the provision for reserves in the Proposed District Plan is adequate. Silverwood oppose my support for prioritising intensification of existing urban areas before increasing provision for ‘greenfield’ settlement.

Future Regeneration Zones

2. This point relates to the discussion of ‘open’ and ‘rural’. As far as I can tell the Council is strongly biased towards maintaining the status quo and has not considered the potential for regenerating native vegetation including accessible bush. This is one aspect of my general point that the Council has not sought to comprehensively fulfil the purpose of local government as defined in the Local Government Act s.10. In response to the comments made by officers: the fact that such a zone does not currently exist is the point, not a reason to dismiss the suggestion, and the current plans for reserves do not cover regeneration to offset and complement the impact of FUZ. Providing detailed protection for some existing vegetation is important but can only have a limited effect. In the long term, accessible indigenous vegetation that contributes to the urban environment will diminish unless assertive measures are taken when there are opportunities to do so.
3. In terms of the objective of my submission there are four types of reserve: (a) open recreational areas, (b) existing bush adjacent to residential areas, (c) regeneration on existing reserves, and (d) future forest and bird reserves. The need for specific attention to be paid to (d) is evident in the decision to locate ‘rural lifestyle’ settlement (e.g. Precinct C of Plimmerton Farm)¹ within easy access of an intensifying upgraded rail hub (e.g. Plimmerton). If all four dimensions of well-being had been considered during the SPP complete

¹ Sweetman 28 June 2022 para.18

regeneration of that Precinct would have provided a mix of activities in the zone with greater benefits to many more people.

Intensification

4. Silverwood opposed my submission that intensification of existing urban areas be prioritised over ‘greenfield’ development. As far as I know there has been no explicit discussion of adverse economic effects that would result from adopting the submission. Consequently I submit that this provision be adopted as a condition to be met by Structure Plans for FUZ.
5. Both the Council and Silverwood have contributed arguments that support the objective of my submission. The Council has supported intensification in principle, in the long term. However, it is in a very weak position that requires a great dealing of frequent ‘monitoring’ with very little ability to act on the findings. The Council evidence confirmed that the provision of potential ‘greenfield’ sites will satisfy housing demand for the foreseeable future² and that some clear incentives will be required for coherent intensification³ of existing housing to gain momentum. Requiring Structure Plans to consider the context of redevelopment in the District as a whole would provide a mechanism to emphasise the importance of efficient and compact urban form⁴, particularly to those with the wherewithal to respond and, if necessary, compete.
6. The most recent submissions from Silverwood make several points that lend support to my original submission and which are evident in the following excerpt:

‘In order for PDP to meet housing demand for 500 dwellings per annum over the next decade, there would need to be a decrease in price. The average price of a house in Porirua would need to drop from \$963,000 to (for example) \$500,000 in order to meet demand. It should be noted that the ‘price elasticity of demand’ for housing in Porirua would need to be determined in order to estimate the approximate price of housing that would be required to meet demand. As context, the average price of dwellings demanded in Porirua is estimated at \$560,000 (accounting for income and the ability for households to raise a mortgage).’⁵

Firstly, housing markets are deeply stratified and exclusive; a fundamental issue that has not been addressed by the Council. Second, supply, demand and price elasticity are important

² Essentially a continuation of the Aotea, Landing, Plimmerton Farm strategy to Pukerua Bay dominated by one or few developers

³ Wellington Regional Growth Framework <https://wrgf.co.nz/>

⁴ A position that is similar in principle to the GWRC approach to limiting cumulative effects of storm water runoff.

⁵ Thompson 20 June 2022 para.93

features of the market sector but relate to marginal adjustments not the structural problems faced by a significant proportion of the population. Third, the thresholds⁶ cannot be predicted with sufficient accuracy to be useful for these purposes over the medium to long term. Consequently, it is more productive to enable measures that influence short term flows of actual housing rather than hypothesise about the total stock in 30 years time.

7. The Council emphasis on abstract estimates of supply and demand has resulted in it pulling up short with the more useful analysis that was initiated in the Housing and Business Development Capacity Assessment: Porirua City Council (2019). In that assessment the Council acknowledged that markets are necessary but not sufficient to create the actual housing stock in the city⁷. The assessment also contained a realistic range of scenarios of total population that can be updated to guide estimates of the flows of housing required⁸. Those estimates will become useful if the Council adds a cohort structure along the lines proposed by all the other TLAs in the metropolitan area in that HBA⁹. Add to that the Silverwood contribution to a more discriminating approach to stratification that is also evident in the NPS-UD (e.g. 3.23(2)) and the Regional Housing Action Plan 2022-2027 adopted by the Wellington Regional Leadership Committee.
8. My submission is that it is important that the Hearing Panel establish an expectation that the Council will address the housing required by the total resident population. An inclusive framework for structure and neighbourhood planning will be essential as the process becomes ever more 'streamlined'. Given such a framework and TROTR willingness to operate outside the market envelope, it is quite possible that a Structure Plan for the Silverwood-TROTR block, integrated in a walkable Waitangirua neighbour, would cross the threshold I have suggested for transitioning from a FUZ. At least the contribution to compact urban form and meeting actual housing need is likely to exceed that of Precinct C in the Plimmerton Farm zone.



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⁶ As distinct from the theoretical dynamics

⁷ Housing and Business Development Capacity Assessment: Porirua City 8 November 2019 ISBN 978-0-947521-14-1 Fig. 4.18 p.197

⁸ ibid Fig.4.15 p.185

⁹ ibid Appendix 1.5 pp.32-33