

9 March 2018

Chief Executive
Hutt City Council
Private Bag 31-912
Lower Hutt 5040

Regarding: Proposed District Plan Change No. 43: Residential and Suburban Mixed Use

Tēnā koe Tony

Thank you for the opportunity to provide a written submission on this consultation document.

Regional Public Health (RPH) serves the greater Wellington region, through its three district health boards (DHBs): Capital & Coast, Hutt Valley and Wairarapa and is based at the Hutt Valley District Health Board.

We work with our community to make it a healthier and safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

The reason for this submission is to ensure that the public health risks associated with the District Plan objectives, policies and rules are considered. The Ministry of Health requires us to reduce potential health risks and promote good health by various means, which includes making submissions on resource management matters.

RPH could not gain an advantage in trade competition through this submission.

We are happy to provide further advice or clarification on any of the points raised in our written submission. We request to be heard in support of our written submission. The contact point for this submission is:

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Ngā mihi

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INTRODUCTION

Regional Public Health (RPH) **welcomes the active role Hutt City Council (HCC) is taking to enable greater housing capacity and a wider range of residential development within the existing Lower Hutt urban area to ensure greater availability of affordable and quality housing.**

RPH's submission to HCC provides information on the public health implications of the *Proposed District Plan Change 43: Residential and Suburban Mixed Use* as the proposed changes influence health and wellbeing of the Lower Hutt population. For some issues, the link is direct and immediate: the increased provision of housing reduces homelessness, and decisions on urban form influence people's immediate access to social structures needed for healthy living. For other issues, links can be less direct and immediate, but the long-term impacts are cumulative and intergenerational: for example, urban form can influence physical inactivity and poor diet and associated diseases, road traffic injuries, respiratory disease and cardiac conditions and social isolation.

Our submission focuses on six specific areas that impact on population health:

1. Housing capacity and variety
2. Housing quality
3. The management of risks from natural hazards
4. The provision of green spaces and communal open spaces
5. The provision of goods, services and community facilities that meet local needs
6. The new medium density design guide

This submission has been structured using these specific areas and the relevant objectives and policies, which have either been amended or newly introduced in the proposed District Plan change. Consideration has been given to the impact of the proposed changes on our priority populations of low socio-economic groups, Māori, Pacific peoples, refugees and youth. To inform the RPH submission, RPH talked with local stakeholders and collected personal stories of Lower Hutt residents and community organisations to ensure that these voices are heard through this process and inform HCC's decision-making process.

OBJECTIVES AND POLICIES ADDRESSING HOUSING CAPACITY AND VARIETY

RPH **supports** the objective of increasing the range of housing options for whānau in Lower Hutt as outlined in the following objectives and policies:

New Chapter 4A General Residential Activity Area

- **Objective 4A 2.2** – Housing capacity and variety are increased.
- **Policy 4A 3.1** – Provide for residential activities and those non-residential activities that support the community’s social, economic and cultural well-being and manage any adverse effects on residential amenity
- **Policy 4A 3.2** – Enable a diverse range of housing types and densities

New Chapter 4F Medium Density Residential Activity Area

- **Objective 4F 2.3** – Housing capacity and variety are increased
- **Policy 4F 3.1** – Provide for residential activities and those non-residential activities that support the community’s social, economic and cultural well-being and manage any adverse effects on residential amenity
- **Policy 4F 3.2** – Enable the efficient use of land by providing for a diverse range of housing types at medium densities.

Those requiring housing and those interested in medium density housing come from diverse backgrounds and have diverse needs. The proposed changes have given thought to the changing composition and demographics of those seeking and requiring housing in Lower Hutt.

Creating increased opportunity for affordable housing will contribute to increased intergenerational equity. The proposed change will help create opportunities for affordable housing that will be attractive and accessible to younger buyers who currently are unable to enter the housing market and youth unable to access the private rental market.

Below is a story that demonstrates the difficulties young people face in accessing housing and an example of why it is important to increase the housing capacity and variety to ensure the most vulnerable are able to meet their basic needs.

Jane's story: The unseen struggle of young people looking for housing

(Vibe – Hutt Valley Youth Health Service)

I first met with Jane (17) in September 2017 when she applied for the Youth Payment. At the time she was living in her car. She had been living with her mum but has a long history of family breakdown and had previously been on the Youth Payment, she had been trying to reconcile and rebuild the relationship with her family, but this had broken down and her mum had kicked her out. Jane was living in her car in the driveway of her sister's house. Her sister was in a volatile relationship and so this was obviously not the best place for Jane to be living. Once the payment was re-granted, Jane continued to live in her car in her sister's driveway. She regularly came into Vibe to use the computer and look for housing. I helped her with this, advised her on what to say in the applications and also how to talk to and present herself to prospective landlords.*

We often found it frustrating that Jane was dismissed before she could even get a look in at some of the rentals or flatmate's wanted, simply due to the fact she is young and on a Youth Payment. The frustration with this is that the fact she is on the Youth Payment actually guarantees her board or rent is paid directly to the landlord before she even receives her weekly payment.

Jane has no previous rental or credit history, and no references, and this also makes it almost impossible to even get a viewing. I often emailed landlords and advocated on her behalf, trying to explain that as Jane is on the payment, it means she also has a Youth Coach as support for any problems that may arise, and that the landlords would be welcome to have their contact details if they needed them.

At the end of November 2017 Jane came to me to ask to be put into emergency housing as her sister had been kicked out of her flat by the landlord, meaning Jane could no longer live in her car in the driveway, and it was not safe for her to try parking it elsewhere. We applied for her to go into the DuPont Motel in Lower Hutt. The DuPont is our main emergency housing provider, and they charge full rate for our young people to stay there. Jane's emergency housing is currently costing \$1253 a week, paid for by WINZ. She has now been there for 11 weeks, and she has still had no luck with finding alternative accommodation.

Although Jane is paying such a high amount for the motel room, it is definitely not a luxury room. It has the basic needs, and situated in a row of rooms mostly comprised of others in emergency housing. This often means there is a volatile mix of people and issues, we have constant phone calls, complaints from the owners and the police have to be called frequently to deal with the different issues. This is not an ideal situation for a 17 year old girl to be living in.

*Jane ages out of our service in a couple of months and she will transfer to WINZ on a main benefit. Once there, she will not receive the extra support that our service can give her in regards to the accommodation searches. She will also have to organize her own emergency accommodation and then apply weekly at WINZ for the payment for it. There are no options for her apart from finding a private rental or flatting situation. Jane has done a Housing NZ assessment but as she is a single young person with no dependents, she will possibly not even make it onto the waitlist. Jane's story is similar to many of our young people's; some of them have their children in the emergency accommodation. Many of them spend a large amount of time there before they can find alternative accommodation. There are too few rentals and when they are competing against working prospective tenants they really have no chance of securing a home. *Name changed to protect privacy.*

Specific recommendations

Partitioning

RPH **recommends** that AMENDMENT 10 is amended to:

Dwelling: a building or unit within a building that is used or designed to be used as a single household residence either as it is or through the partitioning or conversion of existing houses or structures and:

(a) is a self-contained unit;

(b) includes kitchen and bathroom facilities.

The National Science Challenge, Building Better Homes, Towns and Cities (BBHTC), carries out robust research into ways forward for New Zealand to generate sufficient housing stock to meet its current and future needs. Through their research BBHTC have identified that New Zealand, Lower Hutt included, have dwellings which could be partitioned to create additional dwellings due to the surplus of bedrooms relative to the number of residents. With HCC support and the reduction in barriers for whānau to partition their houses, additional housing stock could be made available from current housing supply. According to the Centre for Research, Evaluation and Social Assessment (CRESA) there are over 6,000 dwellings in Lower Hutt that are under-utilised¹ and have the possibility of being partitioned to increase the existing housing stock².

RPH **recommends** that AMENDMENT 16 is amended to include:

Minor Additional Dwelling: a dwelling that is located on the same site as and secondary to a primary dwelling and has a gross floor area that does not exceed 50m². This includes additional dwellings created by converting the interior of a dwelling such as a basement or attic, internal subdivision or partitioning, extending the existing home to accommodate a separate unit, for instance over an attached garage, or building a separate, smaller dwelling, such as a “granny flat” on the same lot.

The above addition to the definition comes from the report on ADU Potential by Building Better Homes, Towns and Cities (BBHTC). BBHTC have identified the need for a wider range and variety of housing in light of the New Zealand context where there are changing composition of households but an ongoing predominance of developments of large homes designed for the traditional single family. This has contributed to a shortage of options for elderly, single people, childless couples and low-income families.³

¹ Under-utilised is defined as a house in which there are two additional bedrooms to a room for each adult in the house.

² Data sourced from Kay Saville-Smith, Director of the Centre for Research, Evaluation & Social Assessment (CRESA)

³ Saville-Smith, K., Saville-Smith, N., & Fraser, R. ADU Potential: Have we the potential to use our existing stock of homes to create a bigger stock of affordable, fit for purpose homes? (2017). National Science Challenge’s Building Better Homes, Towns and Cities. Retrieved from http://www.buildingbetter.nz/publications/SRA1/Saville-Smith_et_al_2017_ADU_Potential.pdf

Inclusionary zoning

RPH **recommends** that HCC introduce inclusionary zoning⁴ for a specific time period for Comprehensive Residential Developments and Medium Density Residential Areas.

HCC has an opportunity to take an active role in targeting the development of affordable and quality housing for low-income and low-wealth household, Māori, Pacific peoples, refugees and youth. Housing need is particularly high among this group. The changes to the district plan will allow for a diverse range of housing types and densities but will not ensure affordable and quality housing for the higher need groups. HCC cannot rely on private enterprise to provide affordable and quality housing to whānau with low-incomes and low-wealth. The development of new housing will have benefits in terms of growing the HCC population but may not address the existing housing need.

Inclusionary zoning can be a short-term solution where there is a shortage of affordable housing; population growth, and the housing supply is slow to respond. There is insufficient housing stock for the current population in Lower Hutt. This has a direct impact on low-income families with specific impacts on Māori, Pacific peoples, refugees and youth who are unable to find appropriate or affordable housing to meet their basic needs.

There were 246 applications on the Ministry of Social Development social housing register for Lower Hutt City as of 31 December 2017⁵, making up 29% of the applications across the wider Wellington Region⁶, this was up from 198 applications at the end of September. This data only captures those who have registered with MSD and are eligible for social housing. It does not include whānau who are ineligible for social housing and cannot afford private rentals, those who have dropped off the MSD list, and those who are “couch surfing” or are staying with extended whānau in overcrowded housing.

Evidence from Queenstown as well as internationally found inclusionary zoning to have a very minor impact on neighbouring properties. The use of inclusionary zoning is beneficial when introduced for a limited time. There are opportunities for developers and Council to work together with community housing providers, like Dwell Housing Trust, to support whānau into affordable housing.

A type of inclusionary zoning was trialled during the re-development of Pomare. Below is one example from Lower Hutt where a community housing provider was able to support a low-income family into home ownership which resulted in secure housing and educational opportunities for a young boy.

⁴ Inclusionary zoning requires new developments to provide a component of the new supply that is affordable and ensures any new supply also meets the needs of low-income and low-wealth citizens. For more information see the report: *Inclusionary Zoning: The evidence from Queenstown*. March 2017. Carried out by Sense Partners on behalf of Community Housing Aotearoa.

⁵ Ministry of Social Development. (2017). *Housing Register*. Retrieved from <http://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/index.html>

⁶ This includes the three councils in the Wairarapa as well as Kapiti Coast District Council.

Shared-ownership model of home buying: “I’m living in my forever home!”

(Dwell Housing Trust)

Mary, a single mother, with her son Sam now live in their own home in Riverside Garden, Pomare. Prior to moving into what Sam describes as his “forever home”, Mary and Sam, who was 8 at the time, lived in seven different places over a period of 20-months. Unable to afford to buy their own place and through a series of bad luck with the private rental market, Mary and Sam moved from friend to family member. In 2014, Dwell Housing Trust put out a call for low-income families who were interested in buying a new affordable home. Dwell Housing Trust trialed a shared-ownership model of providing affordable housing with six properties in Riverside Gardens. How this model of ownership works is that the whānau buy into a percentage of the market price (this is between 70-90% based on what they can afford) and Dwell owns the remaining share of the home (e.g. 30%) and acts as a silent co-partner. The whanau is then expected to buy-out Dwell’s share over a period of 10 years. Mary with support from her wider family was able to pay off her other debts and make the required deposit for the shared-ownership purchase model and has had safe and secure housing for her son.*

**Names changed to protect privacy.*

OBJECTIVES AND POLICIES ADDRESSING HOUSING QUALITY

RPH **supports** the focus on quality housing as outlined in the following objective:

New Chapter 4F Medium Density Residential Activity Area

- **Objective 4F 2.5** – Built development is of high quality and provides on-site amenity for residents as well as residential amenity for adjoining properties and the street.

Specific recommendations

RPH **recommends** that a definition of “high quality housing” be provided in reference to warm, dry, safe housing.

RPH recognises the role the Medium Density Design Guide (MDDG) has in promoting good design to achieve high quality built environments but lacks a definition of quality that includes indoor and external environments.

Two useful definitions for adequate or healthy homes can be found below:

- Statistic New Zealand uses a definition by Edward John Clark from *The Housing Quality Questionnaire: A New Self-report Measure for Public Health Assessment* (2009) which defines adequate housing as:

*“protection from the cold, damp, heat, rain, wind, structural hazards, disease vectors, and other threats to health”.*⁷

- The Ministry of Business, Innovation and Employment’s new Healthy Homes Guarantee Bill (No 2) focus is on ensuring quality housing and will work to ensure that rental housing will:

*“meet minimum standards relating to heating, insulation, ventilation, moisture ingress, draught-stopping and drainage.”*⁸

Ensuring that houses are warm and dry and utilise the natural environment will contribute meaningfully to ensuring a community of healthy people in Hutt City and achieving a high quality built environment. Poorly designed and built infill and medium density housing can deteriorate quickly, lead to isolation and concerns for safety. This has contributed to New Zealanders’ negative

⁷ Statistic New Zealand. *Introduction to housing quality and measuring it.* (2015) Retrieved from http://archive.stats.govt.nz/browse_for_stats/people_and_communities/housing/measuring-housing-quality/intro-to-housing-quality-measuring.aspx

⁸ Ministry for Business, Innovation and Employment. *Housing quality.* (2017). Retrieved from <http://www.mbie.govt.nz/info-services/housing-property/housing-quality>

perceptions⁹ of medium density housing (i.e. leaky homes, multi-level social housing). The way an urban environment is designed, developed and built can create or diminish community cohesion.

RPH **commends** HCC on the work it has done through the provision of an Eco Design Advisor and online resources to improve the energy efficiency and health of existing homes.

Below is a story from the RPH Well Homes Programme of a family in Wainuiomata, although this story does not reflect the current standards required of new builds (e.g. double glazing, insulation), it highlights the importance and impact the indoor environment has on health and wellbeing of families.

Well Homes Programme: Housing is a key contributor to family health

(Regional Public Health, Tu Kotahi Maori Asthma Trust)

In March 2017, the Well Homes programme carried out a house assessment with a whānau living in Wainuiomata. The house visited was 3-bedrooms private rental and was home to 3-generations of 14 people. The house was uninsulated and the grandchildren were sharing a single damp bedroom. Since the grandchildren had moved in they had experienced issues with dry skin, itching, rashes, running noses, sore throats and coughs. While the home had a heat pump this only provided heat for the living area and left the bedrooms cold.

While the Well Homes programme was able to provide heaters, blankets, window tape to reduce drafts and a referral for insulation it is unable to address the underlying challenges under-supply of affordable housing and the low quality housing both which contribute to Rheumatic Fever among children.

⁹ Byrson, Kate. (2017). *The New Zealand Housing Preference Survey: Attitudes towards medium-density housing*. BRANZ. Retrieved from <https://www.branz.co.nz/mdh>

OBJECTIVES AND POLICIES ADDRESSING THE MANAGEMENT OF RISKS FROM NATURAL HAZARDS

RPH **supports** the following objectives and policies that identify the importance of managing risk from natural hazards:

New Chapter 4A General Residential Activity Area

- **Objective 4A 2.6** – Built development is located and designed to manage significant risk from natural hazards.
- **Policy 4A 3.11** – Manage medium density residential development in areas of high natural hazard risk.

New Chapter 4F Medium Density Residential Activity Area

- **Objective 4F 2.7** – Built development is located and designed to manage significant risk from natural hazards.
- **Policy 4F 3.11** – Manage medium density residential development in areas of high natural hazard risk.

Specific recommendations

RPH **recommends** that further consideration and provision be required of the developers as to how medium density housing developments will manage the risk of water, hygiene and sanitation in the case of a natural hazard.

RPH **recommends** that areas with plans for intensification are well linked to emergency planning for neighbourhood resilience.

RPH **recommends** that the MDDG include reference to planning for natural hazards and require developers to include space for emergency water storage by residents.

In the Wellington region, fault lines run through highly populated areas and close to major infrastructure. In the case of a major earthquake normal community and business life is expected to be disrupted for a considerable period of time and individual areas. An event like that would cause significant disruption to the provision of clean drinking water and the management and treatment of wastewater. Where this occurs, the risk of disease outbreaks and spreading of waterborne diseases will be higher where population density is higher – which will be the case with medium density housing. In the case of Christchurch, many homes were left without working indoor toilets and had only limited numbers of portable toilets available, as a result many households dug long-drops in their backyard. This solution will be less viable in medium density housing developments.

Further recommendations on managing risks from natural hazard through building community resilience have been made under the section on the Medium Density Design Guide.

OBJECTIVES AND POLICIES ADDRESSING THE PROVISION OF GREEN SPACES AND COMMUNAL OPEN SPACES

RPH **notes** that there is no objectives or policies addressing green space and no objectives or policies to ensure that there is communal open space with medium density developments. Although this has been encouraged in the MDDG this is unlikely to be sufficient to support high quality intensification, especially in some of the areas that have limited access to nearby areas of green space.

Specific recommendations

The provision of communal open space

RPH **recommends** that AMENDMENT 8 is amended to:

'Definition for Comprehensive Residential Development: a development of three or more dwellings that is designed and planned in an integrated manner, on a site of at least 1400m² with the provision of communal open space. The development may incorporate accessory buildings, infrastructure, landscaping, ~~communal open space~~ and communal carparking.'

RPH **recommends** that communal open spaces be required as part of a Comprehensive Residential Development and Medium Density Residential Areas.

RPH acknowledges that communal open spaces is addressed in the MDDG under Key Design Element 3.4, but including open spaces in the definition above increases the priority that should be given to this important design element that directly impacts on wellbeing.

The changes to the district plan will reduce open space, trees and vegetation in the identified areas. Within vulnerable groups, such as low-income families and individuals, there are a significant number of children and older people who are particularly impacted by the reduced access to open and green spaces. It is important for parents to be able to have outdoor space for their children which is in plain sight of the house.

Communal open spaces provide opportunities for residents to interact and build relationships which contribute to community cohesion. The presence of more communal spaces in a neighbourhood is associated with higher levels of community participation and create place-based social capital and neighbourhood attachment, which ensure thriving communities.

Further recommendations regarding qualities of open space have been include in the section on the MDDG.

Accessibility to green space

RPH **recommends** that HCC prioritise implementing recommendations from the *Review of Valley Floor Reserves* report that has been included in the supporting documentation for this proposal.

As noted on page 36 in the *Review of Valley Floor Reserves* report:

*“Residents in parts of Waterloo and Fairfield, central Avalon, and smaller areas within Naenae, Taita, Epuni and Woburn and in western parts of Alicetown also **cannot reach a reserve within the 8.5 minute threshold.**”*

In regards to this submission on the proposed district plan change, the “Review of Valley Floor Reserves” report recommendations are particularly important for the following areas: Alicetown, Epuni, Naenae, Taita and Waiwhetu/Woburn who scored below 3 on the Amenity / Open space in the “Planning for the Future: A long-term vision for future housing growth and choice” report.

Furthermore the report notes:

*“In parts of Taita, Naenae and central Epuni, people live within 400 metres of more than one reserve. These are the areas with more social housing, higher levels of social deprivation and poorer health than other parts of the valley floor. The value of public open spaces for recreation and health is well recognised, and reserve supply in these areas is justified. Moreover, **it is important in these areas to have a variety of reserve facilities for different experiences. It is also important that reserves are high quality and well-maintained, and that people in the neighbourhood have opportunities for input into the design and development of reserves.**”*

RPH **recommends** that HCC ensures that green spaces in the areas of Taita, Naenae and Epuni provide a variety of reserve facilities for different experiences as well as ensuring that they are high quality and well-maintained.

It is important to ensure that sufficient green space is provided for the increased population density. Green spaces contribute to social well-being by providing places for people to meet and increasing social cohesion and inclusion and can provide a sense of place and source of pride as well as promoting physical activity. Evidence suggests that for residents of medium density housing that the two important facilities that improve quality of life and urban sustainability are supermarkets and green space.

To ensure that positive outcomes are achieved from these proposed changes to the District Plan, it is essential that the implementation of the improvements to reserves and parks are carried out alongside the intensification to achieve a healthy community and a healthy and attractive built environment.

OBJECTIVES AND POLICIES ADDRESSING THE PROVISION OF GOODS, SERVICES AND COMMUNITY FACILITIES THAT MEET LOCAL NEEDS

RPH **supports** the inclusion of Suburban Mixed Use Activity Areas that focus on goods, services and community facilities that meet local needs as identified in the following objective and policy:

New Chapter 5E Suburban Mixed Use Activity Area

- **Objective 5E 2.1** Commercial activities which primarily serve the local community coexist with residential living and provide good community access to goods, services and community facilities.
- **Policy 5E 3.1** Provide for a range of commercial, retail and community activities with a focus on local needs.

Specific recommendations

RPH **recommends** that HCC proactively ensures that the goods, services and communities facilities offered in these commercial buildings support the wellbeing of the community through the provision of accessible health and social services and the creation of healthy food environments.

RPH acknowledges the work and thought gone into developing the plans to ensure that intensification is targeted around suburban hubs. The proposal includes analysis of each location and identifies, in a limited way, access to local shops. The report, “Planning for the Future: A long-term vision for future housing growth and choice”, referenced in the documentation, offers no analysis regarding what access these communities have to healthy food which is a local need.

RPH **recommends** HCC provide clearer guidance as to how it is decided that the commercial, retail and community activities meet local needs.

RPH **recommends** HCC give strategic consideration to creating healthy food environments by¹⁰:

- Providing further analysis that robustly looks at the variety and diversity of existing shops within the community hubs
- Supporting and encouraging an increase in the availability and access to healthy food such as local markets, supermarkets and greengrocers (e.g. developing guidelines promotion and favourable zoning for fruit and vegetable store outlets).
- Creating communities that support healthy eating through street layout, land use, and location of food outlets, markets and supermarkets

¹⁰ Agencies for Nutrition Action. *Promoting Healthy Eating at the Local Government Level*. (2016). Retrieved from: http://ana.org.nz/wp-content/uploads/2016/08/Evidence-Snapshot_0.pdf

- Ensuring planning applications for new developments in the Suburban Mixed Use Activity Areas prioritise access to healthy food
- Using the deprivation index to identify high risk communities and limit the introduction of new fast food outlets through zoning rules. In such cases, a proposal to develop an outlet in a high risk area would then require notified resource consent. This would give an opportunity for community members to express their views on the potential of a new fast food outlet opening in their neighbourhood.
- Creating and supporting local community gardens

INCLUSION OF THE NEW MEDIUM DENSITY DESIGN GUIDE

RPH **supports** the inclusion of the Medium Density Design Guide (MDDG).

Specific recommendations

Place-based and people-centred urban design

RPH **recommends** that the MDDG has a greater emphasis on place-based and people-centred urban design.

RPH **recommends** that amendments be made to MDDG to include place-based and people-centred urban design in recognition that the built form and the relationships of buildings with adjoining properties, streets and neighbourhoods contributes to building cohesion, resilience and thriving communities.

The MDDG can add benefits from including a place-based and people-centred urban design approach. Building strong, thriving and inclusive communities begins with good neighbourhood urban design. The opening up of housing developments is an opportunity to build communities. Prioritising the building of communities will lead to healthy people who live in a healthy and attractive built environment. Each neighbourhood included in the proposal is different and has different needs, each new development would benefit from good stakeholder engagement with the existing community to ensure buy-in and community building.

RPH **recommends** that consultation on the design of any substantial new medium density or comprehensive residential development is held with each of the individual communities as the developments begin.

People, Places, Spaces: A design guide for urban New Zealand (2002) developed by The Ministry for the Environment¹¹ outlines a comprehensive approach to urban design which places equal importance on the steps followed to develop and implement a design for a building, space or wider area it as it does on the specific design ideas themselves.

A place-based and people-centred design approach takes into account the community within which the development is being undertaken (interest groups, iwi, individuals), urban design and development (sustainability, economics, form, infrastructure) and the place itself (natural and built environment) within which is taking place.

People, Places, Spaces: A design guide for urban New Zealand identifies that a successful urban design involves an approach that:

- Understands the urban context

¹¹ Retrieved from <https://www.boprc.govt.nz/media/90678/peopleplacesspacesurbandedesignguideentirereport.pdf>

- Ensures there is a community-led definition of vision and values
- Brings together different sectors, the public and professional groups involved in place-making
- Emphasises a place-based analysis of issues and options
- Develops plans that use an urban design approach that builds on planning, urban economics and community values
- Responds to different cultural issues
- Combines public and private endeavours.

Building resilience through the use of communal open spaces

RPH **recommends** that the MDDG be expanded to support Objectives 4A 2.6 and 4F 2.7 with regards to *the design of the built development to manage significant risk from natural hazards*.

People-centred urban design contributes to increasing community cohesion and resilience. Buildings and urban design that fosters communal space and builds neighbourhood relationships result in well-connected and supportive neighbourhoods.

High quality communal open spaces are core to building community connectedness, cohesion and resilience.

RPH **recommends** that Key Design Element 3.4 of the MDDG be expanded to include qualities that contribute to high quality open space and to residential satisfaction in medium density housing. These qualities¹² could include:

- Access to nature in as many locations as possible
- Design that aims to encourage maximum use and enjoyment
- A variety of types of spaces, potential uses (active and passive) and locations to meet a diversity of resident needs, including children and older people
- Ability to be adapted to meet the needs of a changing resident population over time
- Climate-responsive design that supports site and building cooling and ventilation
- Opportunities for personalisation and territorial expression
- Encouragement of social interaction and participation in activities
- Clear definition of proposed uses of each space
- Universal design principles to achieve accessibility to all people
- Consideration of microclimate: heat, cold, sun, glare, shade and wind

¹² Sarkissian, W., Bateman, R., and Hurley, B. *Open Space in Medium-Density Housing Guidelines for Planning and Design*. (2013). Retrieved from <https://www.sarkissian.com.au/wp-content/uploads/2013/09/Open-Space-in-Medium-Density-Neighbourhoods-web.pdf>

Accountability mechanism

RPH **recommends** that an accountability mechanism for developers be introduced to ensure that the MDDG facilitates both the soft and hard¹³ requirements being met and that all new builds contribute to building thriving and healthy communities as well as a healthy and attractive built environment.

¹³ 'Soft' is in reference to the people, place and process orientated guidelines, while 'hard' references the more build components of the design.

OTHER RECOMMENDATIONS

Lessons from previous work

RPH **recommends** that HCC reviews past housing developments within the Lower Hutt area to ensure that learnings from these experiences can be incorporated into HCC's processes and approaches to new and different developments. Specifically, work with Housing New Zealand to identify lessons from the Pomare housing redevelopment of Farmer Crescent into Riverside Gardens with regards to:

- Use of mixed tenure
- Introduction of new housing into a predominately social housing area
- Integration of new residents into the existing community
- Community voice and input into the design
- Other valuable lessons

Spatial planning

RPH **note** the use of spatial planning to review the Hutt Central Business District development.

RPH **recommends** that spatial planning is considered to support achieve the objectives for Residential Intensification. The high quality housing and neighbourhoods can only be achieved by integrated planning with transport (public and active), amenities and high quality communal and accessible open/green space.

Opportunities for innovation

RPH **recommends** that HCC utilises this opportunity to work in innovative ways with a wide range of private developers and community organisations to revitalise and extend the range and diversity of housing available.

RPH recognises that HCC is exploring alternative and innovative ways of building communities and increasing the number of houses available. Below is one example of where one community is seeking to work in a context-specific way to build a thriving neighbourhood of new housing that places people and their needs at the centre of the design approach.

**He Tipu Manahau: Kia Mau Te Rā (To grow resilience: to keep hold of the sun): Wainuiōmata
Marae's Eco-Papakāinga Co-housing Project**

“We could just plonk down housing with a picket fence and people might even be happy but for us its more than this, it’s about growing healthy families”

(Cheryl Davies, He Tipu Manahau Research Project Lead)

With the return of the land surrounding the Wainuiomata marae to the marae, the marae committee have been working on a plan for how they can best serve the needs of the local community. Their vision is to build a community with 25-30 dwellings to provide short and long term leases to whānau in Wainuiomata of all ethnicities. The complex will be designed around core principals of sustainability, affordability and community with planned use of renewable energy to ensure low-cost warm housing, community gardens and parking to the side of the papakainga. Residents will have access to services, such as, budgeting support and health services with residents agreeing to certain marae tikanga while living there. The development process for this project is also important with plans to ensure local youth can do apprenticeship in solar panel installation and maintenance. Outcomes and learning of the project will be tracked by He Kainga Oranga: Healthy Housing who will providing research and evaluation support. He Tipu Manahau: Kia Mau Te Rā aims to be a model of community-led kaupapa Māori marae based design where the vision for the future of housing in Hutt City starts not with houses but with building healthy families and communities.

RPH OFFERS ITS SUPPORT TO HCC:

RPH offers its support, skills and knowledge in the areas of housing quality, public and active transport, community development and empowerment, and healthy food environments to ensure the Proposed District Plan Change 43 leads to the people of Lower Hutt thriving.

RPH thanks HCC for the opportunity to comment on this Proposed District Plan Change.