

1 July 2020

Plan Change 18 Plimmerton Farm
Environment and City Planning
Porirua City Council
PO Box 50-218
PORIRUA CITY

Re: Proposed Plan Change 18 Plimmerton Farm

Tēnā koe,

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

Regional Public Health (RPH) is the public health unit for the greater Wellington region (Wairarapa, Hutt Valley and Capital & Coast District Health Boards). Our purpose is to improve and protect the health of the population in the greater Wellington region with a focus on achieving equity.

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.

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 Porirua City Council (PCC) is taking to increase housing and housing typology in Porirua.**

RPH's submission to PCC provides information on the public health implications of the *Proposed Plan Change 18 Plimmerton Farm* as the proposed changes influence health and wellbeing of the Porirua population. For some issues, the link is direct and immediate. For example, 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, poor diet, associated diseases, road traffic injuries, social isolation, respiratory diseases and cardiac conditions.

Our submission focuses on the specific areas listed below that impact on population health along with a section of additional recommendations.

1. Housing capacity and variety
2. Transport
3. Water quality
4. Road type
5. Green Spaces and Communal Open Spaces
6. The provision of goods, services and community facilities that meet local needs

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.

OBJECTIVES ADDRESSING HOUSING CAPACITY AND VARIETY

RPH **supports** the aim of increasing the number of houses, housing typologies, and employment opportunities for whānau in Porirua as outlined in the following objectives:

Objective PFZ-O1– Integrated Development: *Development of Plimmerton Farm occurs in a comprehensive, structured and integrated way to increase housing supply, housing diversity, and employment opportunities.*

Those requiring housing in Porirua City and the wider Wellington region come from diverse backgrounds with diverse needs. Providing a range of housing within the Plimmerton Farm Zone will support and contribute to the richness of the diversity of Porirua.

Porirua has a youthful population and creating increased opportunities for affordable housing will contribute to increased intergenerational equity. Medium density housing provision can lead to affordable housing that is attractive and accessible to younger buyers who are currently unable to enter the housing market and those unable to access the private rental market.

Specific recommendations

Inclusionary zoning

RPH **recommends** that PCC introduce inclusionary zoning¹ for a specific time period for Plimmerton Farm Zone.

There is a risk, with housing and urban development, of creating a Porirua of two-halves, with clear delineations between those with wealth and those without. The proposed Plimmerton Farm Zone will allow for a diverse range of housing types and densities but the plan must also ensure **affordable and quality** housing. PCC cannot rely on private enterprise alone, 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 PCC population but may not address the existing housing need. Home ownership in the Wellington region is one of the most expensive in the country. For Porirua, the lower quartile house price is estimated at \$594,358 in October 2019². Through the development of Plimmerton Farm Zone, PCC has a prime opportunity to take an active role in integrating housing by ensuring that developers include affordable and quality housing for low-income and low-wealth households, Māori, Pacific peoples, refugees and youth. Housing need is particularly high among this group.

Inclusionary zoning can be a short-term solution where there is population growth, a shortage of affordable housing and where the housing supply is slow to respond. There is insufficient housing stock for the current population in Porirua. 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 304 applications on the Ministry of Social Development (MSD) social housing register for Porirua City as of March 2020³, making up 16% of the applications across the wider Wellington Region⁴. This is an increase from 247 applications in March 2019. 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 in transient accommodation or are staying with extended whānau in overcrowded housing.

Evidence from Queenstown, as well as internationally, has found that inclusionary zoning has a very minor impact on neighbouring properties. The use of inclusionary zoning is beneficial when introduced for a limited time.

¹ 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.

² Home Loan Affordability report Porirua. October 2019. Available at: <https://www.interest.co.nz/sites/default/files/hla/2019/october/Porirua-city-Oct19.pdf>

³ Ministry of Social Development. (2020). *Housing Register*. Retrieved from <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/index.html#DownloadthelatestnumbersfortheHousingRegister3>

⁴ This includes the three councils in the Wairarapa as well as Kapiti Coast District Council.

A type of inclusionary zoning was trialled during the re-development of Pomare, Lower Hutt City. Below is one example 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.

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 ADDRESSING TRANSPORT

RPH **supports** the focus on a safe, resilient and well-connected transport network that encourages public and active transport, as outlined in the following objectives and standards:

Objective TRPFZ-O1: Transport Network – *A safe, efficient, resilient and well-connected transport network that: (1) Is integrated with land use; (2) Meets local, regional and national transport needs; (3) Enables urban growth and economic development; and (4) Provides for all modes of transport.*

Objective TRPFZ-O1: High Trip Generating Use and Development – *Provide for high trip generating use and development, where these: (1) Integrate and coordinate with the transport network, including proposed transport infrastructure and service improvements; (2) Consider alternatives for access or routes; (3) Encourage public transport and active transport; and (4) Consider opportunities for positive transport effects.*

Standard TRPFZ-S11: On-Site Bicycle Parking Spaces – *Buildings and developments must provide bicycle parking that complies with Table TRPFZ-S11 below except that short stay parking does not need to be provided in Precinct D because public facilities are provided.*

Specific recommendations

RPH **recommends** that the **Objective TRPFZ-O1: Transport Network** and **Objective TRPFZ-O1: High Trip Generating Use and Development** provide further policies that directly address ways in which public and active transport will be encouraged. The intent of the objective is well-intentioned with aims of creating a safe, resilient and well-connected transport network that encourages public and active transport. This objective needs to include:

- Easy, safe and accessible active transport connections with the Plimmerton train station;
- PCC working closely with Greater Wellington Regional Council to ensure regular and reliable public transport options are available from various hubs in Porirua City to Plimmerton Farm including Eastern Porirua where individuals may live who work in the Plimmerton Farm area (i.e. care givers, retirement home workers etc.);
- Urban design of pathways and streets that take into account aging populations.

RPH **recommends** that the **Table TRPFZ-S11: Minimum Number of On-Site Bicycle Parking Spaces** be increased beyond a minimum of 1 park.

Recent years have seen a growth in intergenerational use of e-bikes and e-scooters. The proposed building of a retirement village will likely result in some of the local community of Plimmerton Farm utilising e-bikes and e-scooters for local use. Increasing the minimum requirement of bike parks will support this growth and reflect PCC's support and encouragement for active transport modes.

OBJECTIVES ADDRESSING WATER QUALITY

RPH **supports** the focus on stormwater management and the protection of the receiving waters as outlined in the following objective:

Objective SWPFZ-O1: Water Sensitive Design – Subdivision, use and development contribute to maintaining or improving the water quality of receiving waters, including Taupō Swamp, Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua Harbour.

Objective SWPFZ-O2: Hydraulic Neutrality – Subdivision, use and development achieve hydraulic neutrality.

Specific recommendations

Improving water quality

RPH **recommends** that Objective SWPFZ-O1: Water Sensitive Design be amended as follows:

Objective SWPFZ-01: Water Sensitive Design – Subdivision, use and development contribute to ~~maintaining~~ or improving the water quality of receiving waters, including Taupō Swamp, Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua Harbour.

PCC's stated strategic priorities include, "A healthy and protected harbour and catchment - Te Awarua-O-Porirua". It is widely recognised that Te Awarua-o-Porirua Harbour is in an extremely unhealthy state. PCC's survey from 2018 revealed sediment as a significant threat and heavy metal contamination from roads and stormwater systems. A key finding demonstrated that "reducing sediment run-off from rural erosion and urban development is key to protecting and improving long-term harbour health"⁵. As such, maintaining the current water quality is insufficient and it is in the interest of PCC to ensure that any stormwater management contributes to improving the water quality.

PRECINCT PLAN ADDRESSING ROAD TYPE

RPH **supports** the focus on amenity through shared pathways and tree planting as demonstrated on the Precinct Plan's Road Type 1-10 sketches.

Specific recommendations

RPH **recommends** that the healthy streets design indicators⁶ be considered and incorporated into the design of road types, specifically in Precinct A and Precinct B where the higher density housing will be located. The Healthy Streets Approach was an initiative by the city of London that aims to put people and their health at the centre of decisions about how public spaces are designed, managed and used with the intent of making streets healthy, safe and welcoming for everyone. The development of a new suburb allows PCC to explore the opportunities of designing an area that places health and wellbeing at the centre, creates a community where people, young and old, interact with each other and the environment, choose to travel by active and public transport and enjoy living in the area. Plimmerton Farm Zone provides the perfect opportunity to do this with its likely population of young families buying their first home and older people looking for a safe and welcoming place to retire. The healthy streets design indicators include:

- 1. People choose to walk, cycle and use public transport** – shared pathways and cycleway provided;
- 2. Pedestrians from all walks of life** – clearly marked and smooth walkways;
- 3. Easy to cross** – safe, easy, clearly marked and accessible crossings with Plimmerton Farm and across St Andrew's Road. It is important that it is easy for people of all ages and abilities to find a safe place to cross without having to go out of their way;

⁵ Harbour research & publications <https://porirua.govt.nz/your-council/city-planning-and-reporting/our-strategic-priorities/healthy-harbour/research-publications/>

⁶ Guide to the Healthy Streets Indicators: Delivering the Healthy Streets Approach, Transport for London. Retrieved 25/06/2020 from: <https://healthystreets.com.files.wordpress.com/2017/11/guide-to-the-healthy-streets-indicators.pdf>

4. **People feel safe** – measures such as appropriate lighting, hand rails and traffic calming measures around key destinations (retirement village, childcare facilities, schools, commercial areas) all ensure that people feel safe from crime and injury;
5. **Things to see and do** – visually appealing streets encourage active transport;
6. **Places to stop and rest** – resting places encourage mobility for people who maybe ill, injured, older or very young;
7. **People feel relaxed** – people are more likely to walk or cycle when they feel relaxed and find it enjoyable;
8. **Not too noisy** – noise barriers from St Andrew’s Road (SH1) traffic;
9. **Clean air** – consideration for any air pollution from St Andrew’s Road (SH1) traffic;
10. **Shade and shelter** -- public areas that have shade and shelter encourage people to gather and spend time together despite the varied weather.

OBJECTIVES 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 alongside the medium density developments. Although green spaces and open spaces are planned for within Precinct C, this is unlikely to be sufficiently close to support high quality intensification in Precinct A where private open space will be reduced.

Specific recommendations

The provision of communal open space

RPH **recommends** that communal open spaces be required as part of Precinct A.

RPH **recommends** that **Objective PAPFZ-O2: Character and Amenity Values of Precinct A** be amended to include point (4) as follows:

PAPFZ-O2 Character and Amenity Values of Precinct A

The scale, form and density of subdivision, use and development in Precinct A is characterised by:

1. A built form of predominantly two-storey and three-storey buildings, detached, semi-detached and terraced;
2. High quality urban design and residential amenity; and
3. An urban environment that is visually attractive, safe, easy to navigate and convenient to access
4. Communal open spaces and green spaces for community use

The introduction of medium density housing will reduce open space, trees and vegetation in Precinct A. Children and older people are particularly impacted by the reduced access to nearby 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 creates place-based social capital and neighbourhood attachment, which ensure thriving communities.

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

RPH **supports** the rule that gives permission for activities that include Healthcare, Educational, and Community Facilities in Precinct D.

Rule PDPFZ-R1 Retail Activity, Commercial Service Activity, Healthcare Activity, Entertainment and Hospitality Activity, Educational Facility, Community Facility

Specific recommendations

RPH acknowledges the importance of including Precinct D that ensures easy access to goods, services and community facilities.

RPH **recommends** that PCC proactively ensures that the goods, services and community facilities offered in the commercial area of Precinct D support the ongoing wellbeing of the community through the provision of accessible health and social services and the creation of healthy food environments.

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

RPH **recommends** PCC give strategic consideration to creating healthy food environments by⁷:

- Providing further analysis that robustly looks at the variety and diversity of existing shops within the community hubs;
- Supporting and encouraging the availability and accessibility of healthy food, such as local markets, supermarkets and greengrocers (e.g. developing guidelines around 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;
- Ensuring planning applications for new developments in Precinct D prioritise access to healthy food

⁷ 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

OTHER RECOMMENDATIONS

Ecological assessment

RPH notes the ecological assessment of the site (Section 32, Attachment 9). As described in this report, the majority of the site at Plimmerton Farm lies in the Taupō stream catchment area draining to Porirua harbour and contains areas of native wetlands. Consequently, land use at the site has an affect not only on water quality and safety, (as addressed previously) but also on marine life, and animal and plant biodiversity of the site.

The area has a number of Significant Natural Areas (SNA) such the Taupō Swamp Wetlands Complex. Exposure to the natural environment or knowing that it is nearby is important for residents and contributes to an increased sense of personal wellbeing and to an enhancement of community wellbeing. It is important local SNAs are protected both for now and in the future. **RPH supports the Objectives and Policies in Section 7 (Ecosystems and Indigenous Biodiversity).**

Lessons from previous work

RPH **recommends** that PCC reviews past housing developments within the Porirua and the wider Wellington region to ensure that learnings from these experiences can be incorporated into the development of Plimmerton Farm. Specifically, consider:

- Use of mixed tenure;
- Integration of new residents into the existing community;
- Community voice and input into the design;
- Other valuable lessons

Spatial planning

RPH **recommends** that the Plimmerton Farm development be assessed in light of the themes and approaches developed in the Wellington Regional Growth Framework that is currently being facilitated by Greater Wellington Regional Council. Spatial planning considers plan changes and development of urban areas (housing, transport, etc.) in context and across a region rather than in isolation. 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 PCC continue to utilise this opportunity to work in innovative ways with the private developer to extend the range and diversity of housing availability. There is potential that this development be a model of a community that supports the health and wellbeing of its population.

RPH OFFERS ITS SUPPORT TO PCC:

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 Plan Change 18 Plimmerton Farm leads to a thriving community in Porirua.

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