

**ORDINARY MEETING
OF
STRATEGY AND POLICY COMMITTEE
AGENDA**

Time: 9:30 am
Date: Thursday, 26 November 2020
Venue: Ngake (16.09)
Level 16, Tahiwi
113 The Terrace
Wellington

MEMBERSHIP

Mayor Foster
Councillor Calvert (Deputy Chair)
Councillor Condie
Councillor Day (Chair)
Councillor Fitzsimons
Councillor Foon
Deputy Mayor Free
Councillor Matthews
Councillor O'Neill
Councillor Pannett
Councillor Paul
Councillor Rush
Councillor Sparrow
Councillor Woolf
Councillor Young

NON-VOTING MEMBERS

Te Rūnanga o Toa Rangatira Incorporated
Port Nicholson Block Settlement Trust

AREA OF FOCUS

The role of the Strategy and Policy Committee is to set the broad vision and direction of the city, determine specific outcomes that need to be met to deliver on that vision, and set in place the strategies and policies, bylaws and regulations, and work programmes to achieve those goals.

In determining and shaping the strategies, policies, regulations, and work programme of the Council, the Committee takes a holistic approach to ensure there is strong alignment between the objectives and work programmes of the seven strategic areas covered in the Long-Term Plan (Governance, Environment, Economic Development, Cultural Wellbeing, Social and Recreation, Urban Development and Transport) with particular focus on the priority areas of Council.

The Strategy and Policy Committee works closely with the Annual Plan/Long-Term Plan Committee to achieve its objective.

To read the full delegations of this Committee, please visit wellington.govt.nz/meetings.

Quorum: 8 members

TABLE OF CONTENTS
26 NOVEMBER 2020

| Business | Page No. |
|---|-----------------|
| 1. Meeting Conduct | 5 |
| 1.1 Karakia | 5 |
| 1.2 Apologies | 5 |
| 1.3 Conflict of Interest Declarations | 5 |
| 1.4 Confirmation of Minutes | 5 |
| 1.5 Items not on the Agenda | 5 |
| 1.6 Public Participation | 6 |
| 2. General Business | 7 |
| 2.1 Our City Tomorrow: Draft Spatial plan for Wellington City Hearings | 7 |

1. Meeting Conduct

1.1 Karakia

The Chairperson will open the meeting with a karakia.

| | |
|--------------------------------------|--|
| Whakataka te hau ki te uru, | Cease oh winds of the west |
| Whakataka te hau ki te tonga. | and of the south |
| Kia mākinakina ki uta, | Let the bracing breezes flow, |
| Kia mātaratara ki tai. | over the land and the sea. |
| E hī ake ana te atākura. | Let the red-tipped dawn come |
| He tio, he huka, he hauhū. | with a sharpened edge, a touch of frost, |
| Tihei Mauri Ora! | a promise of a glorious day |

At the appropriate time, the following karakia will be read to close the meeting.

| | |
|---|---------------------------------------|
| Unuhia, unuhia, unuhia ki te uru tapu nui | Draw on, draw on |
| Kia wātea, kia māmā, te ngākau, te tinana, | Draw on the supreme sacredness |
| te wairua | To clear, to free the heart, the body |
| I te ara takatū | and the spirit of mankind |
| Koia rā e Rongo, whakairia ake ki runga | Oh Rongo, above (symbol of peace) |
| Kia wātea, kia wātea | Let this all be done in unity |
| Āe rā, kua wātea! | |

1.2 Apologies

The Chairperson invites notice from members of apologies, including apologies for lateness and early departure from the meeting, where leave of absence has not previously been granted.

1.3 Conflict of Interest Declarations

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as a member and any private or other external interest they might have.

1.4 Confirmation of Minutes

The minutes of the meeting held on 19 November 2020 will be put to the Strategy and Policy Committee for confirmation.

1.5 Items not on the Agenda

The Chairperson will give notice of items not on the agenda as follows.

Matters Requiring Urgent Attention as Determined by Resolution of the Strategy and Policy Committee.

The Chairperson shall state to the meeting:

1. The reason why the item is not on the agenda; and

2. The reason why discussion of the item cannot be delayed until a subsequent meeting.

The item may be allowed onto the agenda by resolution of the Strategy and Policy Committee.

Minor Matters relating to the General Business of the Strategy and Policy Committee.

The Chairperson shall state to the meeting that the item will be discussed, but no resolution, decision, or recommendation may be made in respect of the item except to refer it to a subsequent meeting of the Strategy and Policy Committee for further discussion.

1.6 Public Participation

A maximum of 60 minutes is set aside for public participation at the commencement of any meeting of the Council or committee that is open to the public. Under standing order 31.3, no request for public participation for this meeting will be accepted as this meeting has been scheduled for the purpose of oral hearings only.

2. General Business

OUR CITY TOMORROW: DRAFT SPATIAL PLAN FOR WELLINGTON CITY HEARINGS

Purpose

1. This report asks the Strategy and Policy Committee to recognise the speakers who will be speaking to their submissions regarding the *Our City Tomorrow: Draft Spatial plan for Wellington City* consultation.

Recommendation/s

That the Strategy and Policy Committee:

1. Receive the information.
2. Thank the oral submitters for speaking to their submissions.

Background

2. The Strategy and Policy Committee approved *Our City Tomorrow: Draft Spatial plan for Wellington City* for public consultation on 6th August 2020.
3. Wellington City Council consulted on *Our City Tomorrow: Draft Spatial plan for Wellington City* between 10th August 2020 and 5th October 2020.
4. Following the consultation, each submitter was asked if they would like to speak to their submission at an engagement forum.

Discussion

5. Attachment 1 is the fourth tranche of oral submitters' written submissions.

Next Actions

6. Following the hearings, the analysis of submissions and accompanying report is due to come before the Strategy and Policy Committee in early 2021.

Attachment 1

Oral Submitters' Submissions on Draft Spatial Plan for Wellington City – Part 4

| | |
|------------|---|
| Author | Cyrus Frear, Senior Democracy Advisor |
| Authoriser | Jennifer Parker, Democracy Services Manager Stephen McArthur, Director Strategy & Governance |

SUPPORTING INFORMATION

Engagement and Consultation

This report provides for a key stage of the consultation process – the opportunity for the public to speak to their written submission.

Treaty of Waitangi considerations

There are no Treaty of Waitangi considerations arising from this report. Submitters may speak to matters that have Treaty of Waitangi implications.

Financial implications

There are no financial implications arising from this report. Submitters may speak to matters that have financial implications.

Policy and legislative implications

There are no policy implications arising from this report. Submitters may speak to matters that have policy implications.

Risks / legal

There are no risk or legal implications arising from the oral hearing report. Submitters may speak on matters that have risk or legal implications.

Climate Change impact and considerations

There are no climate change implications arising from this report. Submitters may speak to matters that have climate change implications.

Communications Plan

Not applicable.

Health and Safety Impact considered

Participants are able to address the Committee either in person or via virtual meeting. Democracy Services staff have offered full assistance to submitters in case of any unfamiliarity with using Zoom.

Attendees – Thursday, 26th November 2020

| | | |
|-----|--|--------------------|
| 1. | Judith Graykowski | Pg. 11 |
| 2. | Lynn Cadenhead on behalf of WCC Environmental Reference Group | Pg. 16 |
| 3. | Robert Gray | Pg. 20 |
| 4. | Joanna Newman on behalf of Mt Victoria Historical Society | Pg. 24 |
| 5. | Rachel Macfarlane | Pg. 41 |
| 6. | Sonia Dolan on behalf of Kāinga Ora | Pg. 43 |
| 7. | Ben van den Eykel | Pg. 83 |
| 8. | Michael Gibson | Pg. 87 |
| 9. | Ross Macfarlane | Pg. 90 |
| 10. | Julie Ward | Pg. 93 |
| 11. | Tony Randle | Pg. 117 |
| 12. | Alison Kuiper & Koenraad Kuiper | Pg. 133 Pg. 139 |
| 13. | Bernard O'Shaughnessy | Pg. 144 |
| 14. | Dave Smyth on behalf of Mt Cook Mobilised | Pg. 150 |
| 15. | James Coyle | Pg. 157 |
| 16. | Bianca Tree on behalf of Stride Investment Management Limited | Pg. 163 |
| 17. | Cherie Jacobson & Nicola Saker on behalf of Katherine Mansfield Birthplace Society | Pg. 195 |
| 18. | Lawrence Collingbourne on behalf of Onslow Resident's Association | Pg. 199 |
| 19. | Sam Donald on behalf of FIT Wellington | Pg. 206 |
| 20. | Matthew Tucker | Pg. 212 |
| 21. | Laura Jackson on behalf of Wellington City Youth Council | Pg. 217 |

| | | |
|-----|----------------|---------|
| 22. | Karun Lakshman | Pg. 232 |
|-----|----------------|---------|

Attendees – Tuesday, 1st December 2020

| | | |
|-----|---|---------|
| 1. | Anna Kemble Welch | Pg. 236 |
| 2. | Rosalind McIntosh | Pg. 248 |
| 3. | Marian Evans | Pg. 258 |
| 4. | Marko Garlick on behalf of Generation Zero (original submission made by Eleanor West) | Pg. 267 |
| 5. | Rhona Carson on behalf of Newtown Residents' Association | Pg. 282 |
| 6. | Johanna Drayton | Pg. 288 |
| 7. | Jonothan Briscoe | Pg. 292 |
| 8. | Roland Sapsford | Pg. 302 |
| 9. | Daniel James Coffey on behalf of Thatcher Crescent Residents | Pg. 335 |
| 10. | Kaya Shlomi & Michael on behalf of Forest & Bird Youth | Pg. 353 |
| 11. | Emma Osborne | Pg. 359 |
| 12. | Diana Munster | Pg. 364 |
| 13. | Christopher Finlayson | Pg. 369 |
| 14. | Clara Breitenmoser | Pg. 370 |
| 15. | Craig Thomas Palmer | Pg. 376 |
| 16. | John Bryce | Pg. 383 |
| 17. | Kirsty Wood | Pg. 387 |
| 18. | Robert Brown and Diane Jordan | Pg. 391 |
| 19. | Ellen Blake | Pg. 399 |
| 20. | Philippa Williams | Pg. 403 |

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID **14978**

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Judith M Graykowski

Suburb: Mount Victoria

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Neutral

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

It appears the Urban Design and Planning forecasts for population increase and residential needs are based on flawed assumptions, Statistics NZ numbers based on the 2013 Census. The Draft Planning for Growth document published online is date-stamped 2017, i.e. before the (flawed) 2018 Census data was compiled, and before the fallout on inward migration and desertion of the workspaces as a result of the Covid19

emergency. Please recalculate your forecasts "for the additional 80,000 people" your writers have put forward.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

Cultural vandalism will result if WCC's Spatial Plan removes the pre-1930's demolition rule for the heritage and character dwellings.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Commercial activity (retail, cafes, local businesses), Employment opportunities, Infrastructure (stormwater, water supply, wastewater)

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Landscaped spaces/plantings, Shops and businesses, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.)

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

The Hub in Elizabeth Street, Mt Victoria was a helpful neighbourhood centre

What amenities or facilities were missing or could have been improved?

The branch libraries struggled to turn over bookstocks, the loss for use of the Central Library is massive.

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

2. What would you change or improve?

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Disagree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

The Miramar Peninsula could be the crown jewel for demonstrating ecological values and appropriate attractions for engaging with Maori and Pacifica in cultural pursuits: the mix of land, seashore, the Mt Crawford site on the hilltops is a jewel in Welling

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

I endorse new modern or upgraded state housing with better public transport connections to the rest of the City. What about linking the public transport options with an upgraded Seatounb ferry service to and from the CBD ?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Strongly Disagree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Not sure

11. If you answered yes to the question above, what types of assistance would help landowners?

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Primary point of view on Draft Spatial Plan:

a monstrosity of Urban Planning design, as no designated public transport routes are in place, and the funding of generations of infrastructure spending deficits in the CBD and inner suburbs must precede intensification.

Where are the plans for

- 1) light rail lines
- 2) the potable, stormwater and wastewater upgrades,
- 3) the ambition and requirement for achieving carbon neutrality by 2050, as mandated by the Zero Carbon Act ?

We do not want Wellington's present residents to have to accept degraded environments, poor water quality, sewerage in the harbour from overflows in climate-related weather events, let alone serve up the chaos to newcomers who want to live in a Sustainable City.

1. The Pre-1930 heritage protection should NOT be removed for Mt Cook, Mt Victoria, Thorndon. Heritage suburbs need heritage protection.

2. The Council should NOT change the District Planning rules to allow 4- or 6-storey buildings in Mt Cook, Mt Victoria, Thorndon. Blocks that many stories high will create shading problems for their neighbours, reducing their quality of living, and will wreck the suburbs.
3. Adelaide Road between the Basin Reserve and John Street may be more appropriate for high-rise residential developments, because it is a major transport route and occupied largely by light industry.
4. Sightlines of major heritage structures such as the National War Memorial Campanile (the Carillon building) and old Dominion Museum building (Massey University) should be preserved, so that they can be seen from points around Mt Cook.
5. Where is the Formal Processional Route, from Government House on Dufferin Street to Parliament? Wellington is the capitol of the nation. It's processional route for dignitaries needs to have an Urban Design that reflects its status, and a streetscape more inspired than Taranaki Street (in its present dilapidated shape) or the multiple embarrassing car yards lining Kent and Cambridge Terrace.

Have you provided an attachment? No

WCC Environmental Reference Group Submission to Wellington City Council Spatial Plan

Contact name: Martin Payne, Chair, [REDACTED]

ERG Email address: c/- Hedi Mueller, Democracy Advisor and contact for WCC ERG
[REDACTED]

Postal address: WCC PO Box 2199 WELLINGTON 6140 Attn: Hedi Mueller

Purpose of the Environmental Reference Group (ERG)

Advise Council on the best ways to improve Wellingtonian's quality of life environmentally, socially, culturally and economically by protecting and enhancing the local environment.

Bring knowledge and insight into Council around the environment, including water, energy, waste, biodiversity, urban design and transport management, in the context of Council's roles and priorities.

Our Submission

1. Support in principle for vision, outcomes, direction

ERG supports the intent of the proposed vision "to be the most-liveable city."

ERG supports the aspirational goals and directions signalled in the spatial plan seeking that Wellington be:

- Compact / Denser
- Resilient
- Vibrant & Prosperous
- Inclusive & Connected
- Greener.

Our Reasons:

ERG supports the overall direction of the spatial plan because:

- It clearly signals significant natural areas, landscape areas and natural features for protection and / or higher levels of development control reflecting 'our natural capital' that is 'wild at heart.'
- It aligns areas to be densified with existing key transport routes, enabling the benefits of compact form to be felt through reduced dependence on fossil fuels, and private car use.
- It takes into account the need for Wellington to spread business activities and services across suburban centres: steps that help build resilience in the face of earthquake and other natural hazard risks, and which will improve the liveability through more people being able to live closer to their workplaces.
- Archaeology, heritage items, buildings, places, stories and trees are protected including for mana whenua.
- It signals further changes to further remove on-site parking requirements, supporting moves towards safe and convenient active and public transport modes. New infill and medium density housing, without on-site parking, could create more affordable options for city residents. On-street parking will need to be carefully managed to ensure transport corridors can operate efficiently.

2. Broaden the scope

ERG is concerned that the detail of this spatial plan is primarily focused on signalling areas for housing growth. We seek that the scope of the spatial plan be broadened to signal the future direction for other critical matters to realise the outcomes.

Our Reasons:

- Some important information is missing from the spatial plan for example routes for future mass transit which is a major gap when transportation routes are so critical to densification.
- The plan overlays should signal where the city should NOT grow / further develop, e.g. areas subject to earthquake hazard (the fault lines etc), slips, floods and so forth, including where there is a need to 'strategically retreat' e.g. those areas at risk of inundation from sea-level rise and/or other climate change related risks, e.g. increased storm frequency.
- Also missing is provision for infrastructure, e.g. future locations for waste processing / landfill, three-waters plant, e.g. will the city really continue to rely upon a small number of centralised wastewater plants?

3. Include a set of principles

Our Reasons:

ERG recommends that the spatial plan include a clear set of principles to frame and guide the statutory plans, by-laws and investment decisions that will realise the vision and outcomes of the spatial plan over time. ERG seeks that these guiding principles include, but are not necessarily limited to, the following topics:

- Diversity and equity*
- Quality, availability and affordability of housing
- Moving people and goods around Wellington
- Energy use / carbon
- The natural capital
- Heritage
- Character
- Resilience and infrastructure.

* Whilst ERG do not wish to presuppose the direction taken in regards these principles, we do seek that the Diversity and equity principle explicitly include the matters of honouring Te Tiriti o Waitangi, universal access, and the rights of the child.

Honouring Te Tiriti o Waitangi should be key in all policies developed by WCC. It is very important that the voices of mana whenua are listened to and acted on, and that their taonga in Te Whanganui-a-Tara is preserved and enhanced.

The rights of the child i.e. UNESCO's Growing Up in Cities Project and Child Friendly Cities Project become increasingly important as a city densifies as without forethought, places for children to be active, sufficient outdoor space for children, places where children could play without too much supervision can suffer: we have heard of instances, for example, of children being banned by body corporate rules from outdoor communal space without an adult. There is a need for indicators to monitor 'child-friendliness' and for child impact assessments. This is much more than providing playgrounds.

Universal access. ERG seeks that universal design be embraced and encouraged: intentionality to this matter in plans, rules and decisions will progressively improve the lived experience for people of all ages and abilities. The

Spatial Plan needs to include an in principle commitment to accessibility to be implemented under the District Plan to ensure buildings and public spaces are designed for people of all abilities.

4. Include waterways in the overlays

ERG seeks that the spatial plan incorporates into its various green space overlays the city's streams and wetland areas, including urban streams currently piped.

Our Reasons:

- As a very long-term plan, the spatial plan has the opportunity to signal areas where streams might be 'daylighted' in the future as part of progressive improvements to water quality and associated habitats, and / or future stormwater and/or wastewater infrastructure redevelopments, as well as increasing access to green spaces as living densifies.
- "Ribbons of blue" are as critical to the city as "corridors of green" if we are to progressively enhance the city's status as the 'natural capital,' and in many cases, will be one in the same. The nature of this spatial plan is that its impact will be felt well beyond 30 years - a good reason to signal in this plan what 'could' be in regards to our streams.

5. More aspirational vision needed, described at level of the neighbourhood

ERG seeks that the vision statement be strengthened in a way that better articulates what is sought for the 'lived experience' of future Wellingtonians.

Our Reasons:

- ERG submits that this vision needs to be more tangible, and tell the story of the lived experience Wellingtonians are looking to see for the future - firstly at the level of their local neighbourhood, and that this has coherence in light of the wider city – and region. What's the lived experience we want a young family to be having? An older couple? A group of young entrepreneurs? Students? Immigrants to our town?
- ERG's view is that an important element of this needs to be Wellington as the 'natural' capital, a city that is 'wild at heart.'
- ERG submits that the spatial plan needs to also tell the story of the city at the landscape level – what is the whakapapa of the land? The stories of the hills, the streams and the sea.
- ERG seeks that the spatial plan better reflects the cultural landscape and that this is done in partnership with mana whenua, as well as in consultation with heritage NZ and local groups with historic expertise and interest. The resource focused on cultural value to date has been applied with a very colonial focus - there needs to be more focus and resource used on the cultural values of mana whenua, and the natural value of the city.

6. Engage to capture desirable 'lived experience' with youth, children, low income renters etc

Our Reasons:

ERG is of the view that capturing the aspirational 'lived experience' at the level of the neighbourhood be achieved through engaging with those for whom Wellington is their future (including youth, people who rent, recent arrivals to the city and those on lower incomes). This is essential if a meaningful vision is to be developed as it will enable a better idea of what people actually want and how they want to live, so that this can be better provided for.

7. Include quality public space outcomes

Our Reasons:

ERG recommends that the spatial plan include another outcome seeking quality public spaces. This should include the streetscape/public realm and the quality of living provided to the resident. Solving climate change, reducing

energy use and waste, demands attention to the quality and longevity of buildings and public spaces. Dwellings need to be warm, dry and functional and that our public spaces invite participation in the life of the city rather than isolate individuals from it.

ERG encourages the Council to seek a more integrated approach when enabling larger scale redevelopment, for example through partnership with mana whenua, Kāinga Ora, property developers and social housing providers. Alternative development mechanisms should also be explored.

Thank you for the opportunity to make this submission.

ERG DOES wish to be heard on this submission.

Martin Payne

Co-Chair

for the Wellington City Council Environmental Reference Group

Submission: Wellington City Council Draft Spatial Plan

Submitters;

Robert and Chris Gray

[REDACTED]
Mt Victoria
Wellington 6011

Mobile:

Robert [REDACTED]
Chris [REDACTED]

Email:

[REDACTED]

Personal

I was born in Wellington and have lived and worked here all my life, my wife has lived in Wellington for 50+ years. Eighteen months ago my wife and I fulfilled a long-held desire to live in Mount Victoria when we purchased an 1890 villa in Porritt Avenue. We have since completed major renovations to the inside and grounds, retaining all the original external heritage aspects of the villa.

One of our sons and his family also lives in Mt Victoria, and the other and his family in Mt Cook.

The reasons for wanting to live in Mt Victoria included;

- The uniqueness of the Edwardian and Victorian architecture of Mt Victoria which is instinctively recognised as Wellington in both New Zealand and overseas.
- Its history
- Its ethnic diversity
- The sunlight which was one of our must haves when purchasing in Mt Victoria.
- The close-knit community which is very active and is a good mix of ages. (Owners, Renters, Students and Families)
- Backyard privacy.
- Ease of walk to the city and shops.
- Closeness to Hospital
- Nearby bus route.
- Close to children and grandchildren.
- The greenery and bush walks on Mt Victoria.
- The Bowling club.

From a work point of view I have been CEO of large national and multi-national companies (Datacom and EDS), a director of a number of businesses including Council controlled entities, Wellington Economic Development agency, Creative HQ and Chairman of the Wellington Waterfront Company.

I have been heavily involved throughout my career in strategic planning which provides me with a good background in commenting on the Spatial Plan.

Robert Gray

Christine Gray

Submission: Wellington City Council Draft Spatial Plan

Submission - WELLINGTON'S FUTURE DEPENDS ON IT

We understand the need to make Wellington a modern vibrant city but to strip away its historical past is wrong, and once done **there is no going back**. Many of the houses built prior to 1890 have been brought up to modern day standards. They have stood the test of time through the many earthquakes over the years. The same cannot be said with many new buildings that have succumbed to both earthquakes and weather tightness issues.

The proposed Spatial Plan appears to have not been thought through properly, which is supported by the number of un-notified changes being made during the submission period, which is unacceptable. As the plan currently stands our fear is that Wellington is going to lose its identity which will be lost forever. This Council needs to stand up and be counted to ensure Wellington's unique Character is retained.

Our Submission:

1. **PRE-1930 DEMOLITION:** We strongly disagree with the Council's proposed intensification in the inner suburbs, the removal of the pre-1930 character demolition controls and the prescribed height and scale of replacement buildings.

2. **PROJECTED GROWTH:** We strongly refute the projected growth numbers and recommend that the review of the Spatial plan is deferred until the impact of Covid on the future of our city is better known. Having realistic growth figures is critical to the future of Wellington and it would be **irresponsible** for the Council to go ahead with the current numbers.
 Due to Covid the world is changing where historical data is becoming irrelevant and the way business's operate in the future is already changing. People have tended to live close to their work, but level 4 of Covid has shown that working from home is now practical and efficient and that many organisations are looking at restructuring their companies to allow for this option. This argument can at this early stage be supported by Public Servants currently working either part-time or fulltime from home. I have also been advised by my insurer AMI that they will close all branches by June 2021 and all future business will be conducted on-line. This is only the beginning and was further supported by newscast and articles last week stating that some of the world's larger cities are starting to see the restructuring of companies to cater for on-line business and moving out of cities.
 The benefits for these changes are companies reducing high costs of city buildings by either moving out of the city or downsizing and for workers to live in areas to meet their lifestyle and budgets.
 The above changes to companies will free up commercial property in the city which could then be converted to residential apartments/flats which would add to available residential stock in the city.

3. **EXCLUSION OF HERITAGE AREAS:** We believe that all "Heritage" and "Character" areas should be excluded as areas designated for intensification in the draft Plan. Based on a projected medium by Statistics (46,700), and not including the Covid effect, there appears to be sufficient space to meet the future growth. Areas such as Adelaide Road, Kent and Cambridge Terraces have potential to grow with a mixture of Residential/Commercial buildings, and at the same time improve the appearance of what are currently run-down areas. With business's restructuring (refer Projected Growth above) this will open up the opportunity to convert vacant commercial

Submission: Wellington City Council Draft Spatial Plan

buildings in the city to residential. Removing the Character areas from intensification designations would **alleviate any risk of Wellington losing its unique “Heritage” identity**. There will always be the opportunity to relook at this sometime in the future if further expansion is required and the effect of Covid-19 is better understood.

4. **CAR PARKING:** We oppose multi-story buildings being erected without on-site car parking in Mount Victoria. We have now lived in Porritt Avenue for a year with car-parking availability in the street initially comfortable but over the last six months space is difficult to find at many times of the day. The last thing that we need is more cluttering of our streets through residents not being able to park on their property. It is unrealistic to think that many people won't require a car because they live close to the city.
5. **SITE COVERAGE:** The proposed Spatial plan as it stands will compromise sunlight, view, light and privacy for those properties neighbouring to the proposed high-rise buildings due to their height and extension of the site coverage.
We oppose extending the current site coverage formula and proposed height levels particularly where neighbouring existing Character and Heritage houses.

As previously requested we would like a copy of the **planned process** for moving forward with the Spatial Plan once submissions are received.

Questions:

1. Could you please provide the rationale for not including all of Austin St and part of Brougham St, Mt Victoria, in the Character sub-areas?
2. Myrtle Crescent, Mt Cook, is made up of many pre 1900 villas. Why is this street designated to have 6 storey buildings replacing the heritage area?

Submission on the Draft Spatial Plan addendum

Robert and Chris Gray

[REDACTED]
Mt Victoria
Wellington 6011

Mobile:

Robert [REDACTED]

Chris [REDACTED]

Email:

Please note that our main submission was sent on the 27 September and acknowledged by the Council of receipt on the 28 September.

This submission is an addendum to the first one which is attached and should be read as one.

6. We reject the proposal for 3-4 storey buildings allowed to be erected between 84-128 Austin Street plus those on Ellice Street between Porritt and Austin St. These properties back on to houses along Porritt Avenue and will have a major negative impact on these properties.
 - This puts at risk loss of individual houses and groups of houses that are an important part of our identity, history and culture. An example being 49 Porritt Ave, once home of Kate Edgar, first woman to gain a university degree in New Zealand and one of the 39 houses featured in the Wellington City Council's Mt Victoria Heritage Study report.
 - Currently Porritt Ave houses have a full view of Mt Victoria. 2-4 Storey houses built on the boundaries will block out ALL of Mt Victoria to many of them.
 - Privacy, some sunlight and light will be compromised.
 - Property values will be negatively effected.
 - The no onsite parking recommendation, particularly for apartment buildings, will add further to congestion of carparks in the streets.
 - Currently there are students utilising affordable accommodation in these streets, which will be replaced by new more expensive accommodation in the future.



October 5, 2020

Wellington City Council
P O Box 2199
Wellington 4140

Submission on the Draft Spatial Plan

This submission is made on behalf of an organisation, **Mt Victoria Historical Society Inc.**

It is an incorporated society with the aims of researching and sharing the history of the suburb of Mt Victoria and promoting interest in, and preservation of, its unique heritage.

Contact details: Joanna Newman, Convenor
[Redacted]
Phone [Redacted]

As appropriate to our mandate, this submission focuses on aspects relating to Mt Victoria and its heritage.

PART 1: INTRODUCTION

1. Summary Position

- 1.1 We believe the Council's underlying population forecasts are exaggerated, and so the number of new dwellings that will be needed in future is as well.
- 1.2 We call on the Council to designate the whole of Mt Victoria as a heritage area and for the pre-1930s demolition rule (or something similar) to continue to be applied across the whole suburb.
- 1.3 We believe that the housing typology applied to the majority of Mt Victoria, excluding the Kent Terrace border, should be Type 1. This is what fits most appropriately with existing pre-1930s buildings.
- 1.4 Intensification should be phased, with changes in height controls introduced only as blocks of new capacity are actually shown to be needed, with more fundamental reviews at, say 10 and 20 years, to see how demand has been met. This would mean that the heritage of Mt Victoria does not need to be destroyed from day one for capacity that may not be required.

- 1.5 The process has been badly managed, with documents unavailable in an accessible form, new documents being added throughout the process until just over a week before consultation ended, and documents constantly changing – all without notification. We submit that a new scheme for Mount Victoria needs to be developed, based on an expanded set of qualifying matters and that the Council complete a design for this in close consultation with affected stakeholders, while also completing a draft evaluation report in support of it.

2. General

- 2.1 We are not opposed to intensification or increased development of affordable housing. We understand the need for the city to accommodate more people in a sustainable way.
- 2.2 We do not accept, however, that the removal of heritage protection in Mt Victoria or other areas with heritage housing stock is required to achieve the Council's goals of providing sufficient housing in Wellington.

There are, for example, significant areas of Te Aro, Adelaide Road, Kent and Cambridge Terrace, and Thorndon Quay that could be developed for housing before any requirement to even consider destroying the valuable heritage precincts of the city.

- 2.3 As WCC's own statistics show, Mt Victoria is already a medium density housing area - in fact relatively high for a residential suburb. It is the third-most densely populated inner suburbs (after Mt Cook and Newtown West) despite over half of its area being Town Belt, three schools and Government House.

To increase the quantity of housing in this suburb would make it statistically high density, which would completely destroy its character and the qualities of life which help preserve that character.

- 2.4 Mt Victoria has already suffered from poor planning decisions. We would press for greater adherence to the heritage protection rules in the current District Plan and strengthening of rules in future.
- 2.5 There is considerable strength of feeling among Mt Victoria residents – tenants as well as landowners – about the proposed changes. This strength of feeling is evident in the number of signatures on our petition calling on Wellington City Councilors & Mayor to reject the Spatial Plan proposal and retain the pre-1930s demolition rule for all of Mount Victoria, a copy of which is attached as Appendix 2.

PART 2: SUBSTANTIVE ISSUES

1. Forecasts underlying the Spatial Plan

- 1.1 The numbers underpinning the proposed density maps are highly questionable, to the point of being misleading. The NPS-UD July 2020 in Section 3.24, 5(b) says that the Council must “identify which of the projections are the most likely in each of the short term, medium term, and long term”. On page 22 of the Council’s HBA¹ it states that it believes the “the Forecast.id projection [i.e. the medium forecast] is a more accurate predictor of likely growth for Wellington City over the long term”, and the high-growth forecast is 74,484, and yet The Council has consistently stated in the Draft Spatial Plan and in promotional material that it needs to plan for an increase of 80,000 people over the next 30 years.

MVHS argues that WCC has not shown there is a material shortfall in housing capacity over the next 30 years (under the current rules), sufficient to justify removing the pre-1930s non-demolition rule to provide for intensified development.

- 1.2 Furthermore, on September 25, the Council issued a new document. Where the Draft Spatial Plan document says that the inner-city suburbs must accommodate 14,000 people and 4100-5400 additional dwellings over the next 30 years, Council believes the spatial plan will deliver only an additional 1083-1895 dwellings.² Although the new estimates use different assumptions, so they are not directly comparable, it is clear that variations in the modelling can have a dramatic effect on the results.

Three to six new dwellings per annum for Mount Victoria can clearly be met under the current rules – the equivalent of the suburb’s share of the total for the inner city that is projected.

- 1.3 There is a widespread view that the Council’s work is lacking in rigour.

We call on this Spatial Plan process to stop now and for the Council to go back to the drawing board to get the basics right, using much wider consultation and expert input.

2. The value of Mt Victoria’s built environment to the city

- 2.1 The built form and heritage of Mt Victoria are too important to Wellington’s identity to lose. And, it would be lost, if the protection of its character were to be removed.

Of all the historic areas in Wellington, this is the one most visible to all visitors, national and international. It is the backdrop to a high percentage of images promoting and defining the city, as shown in both the New Zealand and French tourist publication examples below.

¹ https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0015/3282/Wellington-Regional-HBA-Chpt-2-Wellington-City-Council.pdf

² See Appendix 1 for our detailed analysis.



In April and May 2019, 1,372 people made a submission on the WCC Planning for Growth Survey. The council feedback summary noted “adamant opposition to character loss was expressed in around 200 comments with the main sentiment being that the essence of what makes Wellington a great city would be lost if character was not protected”

- 2.2 To help preserve the heritage of Mt Victoria and Wellington, we believe that new building within the overall ‘character’ area of Mt Victoria should be restricted to Type 1 of the Draft Spatial Plan housing typology.
- 2.3 The potential for further promotion of its heritage to Wellingtonians and visitors is strong. It has been the home to many famous or well-known figures (e.g. Bernard Freyberg, Kate Edgar, William Waring-Taylor) and their original homes are still standing.
- 2.4 We also believe it is important that views of this suburb (and the Town Belt) are not blocked by a wall of multi-storey buildings along Kent Terrace, and the character of the Kent/Cambridge Terrace is not destroyed by creating a shaded wind-tunnel.

3. Heritage not character

- 3.1 We call on the Council to designate the whole of Mt Victoria as a heritage area and for the pre-1930s demolition rule (or something similar) to continue to be applied across the whole suburb.
- 3.2 Mt Victoria is one of the oldest suburbs in Aotearoa, laid out in Mein Smith's 1840 plan for the city. Its 'character' derives in particular from the heritage of its Victorian and Edwardian housing stock. 85% properties pre-date 1930, 90% of these categorised as primary and contributory³ (38% and 52% respectively). It has a number of houses built in 1869 – some of the earliest extant dwellings in the city.

But more than buildings representing the architecture of a certain period, these are 'living' reminders of the people who have built our city: labourers, small and prosperous businessmen, temperance leaders, educators and brilliant men and women, workers for their churches and social causes. Many of these layers of history behind the façade of a house are already known: many more are yet to be told. It can be visualised and understood by walking through Mt Victoria.

Once this heritage is gone, it is gone forever. It is not just character, as represented by a gable shape.

4. Flawed application of NPS-UD 'qualifying matter'

- 4.1 The Council Strategy and Policy Committee paper of August 6 explained:

The proposed approach to pre-1930s character protection in the inner suburbs meets the criteria of a 'qualifying matter'. This is because a site-by-site assessment of the existing character in these areas has been undertaken which the proposed approach is based on. Without this, a significant amount of the inner suburbs would be captured by the broad requirement to enable building heights of at least 6 storeys within a walkable catchment of the Central City.

The "site-by-site assessment" referred to was initiated with the Boffa Miskell Pre-1930 Character-Area Review.

- 4.2 In relation to this report, we would comment:
- It lacks depth and, taking a streetscape-based approach to individual houses and collections of houses, is wholly inadequate as a means of understanding the heritage values of those streets. It demonstrates no recognition of the role that historic and social values play in understanding the heritage values of streets, subdivisions or the entire suburb.
 - The report's conclusions, particularly as they are laid out in the maps in the appendices, are very broad-brush and avoid any particular conclusions about the value of the Mt Victoria Character Area except for Appendix 4, Figure 8, 'Indicative Character Contribution Sub-Areas: Mt Victoria', where areas are explicitly labelled either primary/contributory or neutral/defective. (There are also areas left blank, without explanation).

³ Boffa Miskell Pre-1930 Character-Area Review 23 January 2019

- While the general conclusions reached about the value of the so-called neutral/defective areas might be roughly accurate from a streetscape perspective, these areas make up only a small part of the suburb. The implication therefore is that everything outside of this has heritage value.

4.3 In light of this, the Spatial Plan seems to relate only superficially to the conclusions reached in the Boffa Miskell report. The disconnect between the two is alarming, given that we have been repeatedly told that the Spatial Plan was supposed to be based on the conclusions reached in that report. The Spatial Plan offers such a dramatic change to the built environment that we question why there is no explanation or justification for this, given the importance and significance of the change.

To the extent that it takes account of the Boffa Miskell report, the Spatial Plan simply expands on those areas identified as neutral or defective in that report and creates much larger areas for intensification. It is a crude approach, completely lacking in nuance, and it means that important heritage streetscapes will eventually be destroyed by intensification. Some of the consequences of this are described below.

- 4.4 Under the NPS-UD Section 3.33, 3 b) a matter is not a ‘qualifying matter’ unless it: *includes a site-specific analysis that:*
- identifies the site to which the matter relates; and*
 - evaluates the specific characteristics on a site-specific basis to determine the spatial extent where intensification needs to be compatible with the specific matter*

We do not believe that the Draft Spatial Plan ‘character sub-areas’ meet this requirement and that designating the suburb a heritage area is more justifiable and sound (see 6 below).

- 4.5 We also submit that the list of qualifying matters needs to be expanded to include:
- **Heritage:** It is important that heritage and not just “pre-1930s” character is included, as heritage is listed under RMA s6(f) as a matter of national importance, and so a qualifying matter that is more readily substantiated in response to NPS requirements. Pre-1930s character is just one aspect of heritage.
 - **Shape and Form of Buildings:** Even where buildings do not exhibit heritage qualities, if they are of a similar form and scale to neighbouring heritage structures, then the suburb is more cohesive and heritage can be better sustained.
 - **Views from the City:** The integrity of Mount Victoria’s built environment is critical to the maintenance of the iconic views from Wellington city of the suburb.

5. Character sub-area problems

- 5.1 There are streets that contain important heritage but only on one side. However, because the other side of the street has less authenticity or homogeneity, the whole street is excluded from protection. A good example of this is Lipman Street, the east side of which is near intact.
- 5.2 Streets and collections of houses of heritage value that will be threatened by this plan in Mt Victoria include (but are not limited to):

South and central Austin Street and associated side streets Rixon Grove, Westbourne (east)

Although parts of Austin Street have been affected by townhouse and apartment developments from various eras and it therefore does not have a contiguous heritage streetscape, it still contains clusters of important single and two-storey houses. There is also much of value remaining in eastern Pirie Street, Rixon Grove and Westbourne Grove. These no-exit streets have a particular character that is derived from having no through traffic, low-scale cottages and villas and a proximity to the Town Belt.

North Austin, Majoribanks, Port and Stafford Streets, Earls Terrace and Vogel Street

The presence of pockets of newer houses and larger apartment complexes in this area is presumably the reason why it has been proposed to be stripped of protection, but again this area contains no-exit streets with a particular character, which is also partly derived from the hillside locations they occupy and the backdrop of the Town Belt.

Central and south Brougham Street plus intersections with side streets

The exclusion of this area, with a few exceptions, is difficult to understand. There are intact stretches of heritage housing on both sides of the street; there is a Council District Plan-heritage-listed building (former Crossways); there is the recently restored 1869 Carroll house; and important side streets (or parts of) are excluded, including, inexplicably, the corners of Queen and Elizabeth Streets. Within this area are many 19th century houses, some with relatively high integrity.

Ellice and Paterson Streets

Again, the exclusion of these streets, which contain stretches of heritage housing, some dating from as early as 1869, is hard to fathom. Lower Ellice Street was identified as a significant heritage area in the Wellington City Council Mt Victoria Heritage Study, June 2017. (See also 6 below). There are specific groups of houses and notable individual houses included in these streets. Some of those precincts only occupy one side of the street and in the case of Paterson Street, there is only one side extant. These factors should not be disqualifying.

- 5.3 There are completely illogical exclusions from character sub-areas, such as Tutchan Avenue in the middle of the Porritt/Amour/Albany Ave area. This small dead-end street, with mostly original housing (including the home of last harbour pilot to live in the pilot's cottage at Worser Bay, William Shilling, who lived there for over 40 years before he died in 1939). This is designated for "3-4 storey apartment buildings, may be mixed use". This is a complete travesty from a heritage and a town-planning perspective.

6. Legal precedent for recognition of Mt Victoria's historic heritage

- 6.1 The Basin Bridge Inquiry and the following successful High Court Appeal concluded that the southern end of Mt Victoria – essentially Ellice and Paterson Streets - is a significant part of the historic heritage of Wellington.

The High Court Decision⁴ concluded that the Board of Inquiry did not err in recognising 'a "wider heritage area" which it considered could be affected by the Project, which stretched from Taranaki Street in the west through the Basin Reserve and Council Reserve areas to Government House and the Town Belt in the east' [para 339] and that 'The

⁴ IN THE HIGH COURT OF NEW ZEALAND WELLINGTON REGISTRY, CIV 2014-485-11253 [2015] NZHC 1991, July 2015

cumulative adverse effects of dominance and severance caused by the proposed transportation structure and associated mitigation structure in this sensitive heritage precinct, particularly on the northern and northeastern sectors of the Basin Reserve Historic Area setting.' [para 340, our underlining].

In addition, the High Court Decision stated:

[381] In seeking to identify from the Board's broad review the interpretation which the Board placed on s 2, there are three paragraphs which I consider are particularly instructive:

... [557] The protection given by Section 6(f) extends to the curtilage of the heritage item and the surrounding area that is significant for retaining and interpreting the heritage significance of the heritage item. This may include the land on which a heritage building is sited, its precincts and the relationship of the heritage item with its built context and other surroundings.

... [615] In defining historic heritage, the RMA makes a clear distinction between historic sites and historic heritage. At their conferencing, the experts drew attention to the definition of historic heritage in the RMA – which includes (b)(iv) surroundings associated with the natural and physical (historic heritage) resources.

... [623] We agree that we are obliged to consider the effects on historic heritage and that historic heritage includes not only built heritage but the surroundings and setting in which the built heritage exists. In our view, the explicit focus of [NZTA], Wellington City Council and Heritage NZ heritage assessments on built heritage, as distinct from historic heritage, unduly limited the scope of those assessments.

- 6.2 The above provides a clear legal opinion and precedent for southern Mt Victoria being an area of historic heritage, which should therefore be a “qualifying matter” that exempts it from the requirement under the NPS-UD to allow buildings up to 6-storeys in height.

Furthermore, if this character is recognised for southern Mt Victoria under the RMA, then it should apply to the entire suburb.

7. Kent Terrace and the border of Mt Victoria

- 7.1 We appreciate that Kent Terrace is an opportunity for intensification, with car-yards in particular being an inappropriate land use.

We do not, however, believe building up to 8 storeys is appropriate. This is in the transition zone to Mt Victoria and the Town Belt, so a more appropriate height would be 6 storeys. This would also help preserve the open boulevard aspect of Kent/Cambridge Terrace and the Canal Reserve.

On the eastern side of buildings fronting Kent Terrace, 4 storeys would be appropriate.

On the eastern (hill) side of Hania Street, buildings would preferably be Type 2, 2-3 storeys terrace-type housing in order to preserve the amenity and heritage of the very significant Moir Street character sub-area.

7.2 Other areas of Mt Victoria which are designated “Central City” which, for transition zone reasons, should particularly not be built up to 8 storeys are:

- the west side of Lipman Street
- the corner of Roxburgh/Majoribanks Street to Fallowfield Ave
- the east side of Home Street

8. Amending ground level open space and recession planes controls

8.1 We are very concerned to read of the vague description in the Draft Spatial Plan of proposals to amend “specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed.” This potentially gives residents of these new builds no amenity, but also destroys the amenity of existing residents on all boundaries. In an example of this currently under construction in a Mt Victoria character sub-area, there is not a square metre of open space on the property. Covering an entire property with building or concrete is also not environmentally sound.

9. Phasing

9.1 The potential over-estimation of housing requirements by the Council, coupled with post-COVID uncertainty and potential government intentions to move functions out of the central city (Dominion Post 29.9.2020), suggest that a sensible way to plan for intensification would be to phase it.

9.2 Renewal and new building currently takes place at a rate capable of more than meeting the numbers required by the Council’s latest calculations to satisfy Mount Victoria’s allocated share of planned growth. At this moment, eight new dwellings are under construction in character sub-areas, replacing two.

9.3 In other words, heritage suburbs should not be opened up for developer-led intensification until the need is proven. While the NPS requires sufficient capacity to be identified for the coming 30 years, it does not require that all of this be made available immediately. Only what it defines as ‘short term’ capacity – that required in the next 3 years – needs to be available at any one time. As one block of such capacity is nearly used up, more can be made available as there is evidence of need. And if the early blocks of capacity are targeted at areas that are a priority for redevelopment, this will protect heritage areas meanwhile. If subsequent reviews in, say, 10 and 20 years show that housing demand cannot possibly be met without seriously compromising Mt Victoria, a revision of the general plan for Mount Victoria can be undertaken in light of such evidence.

PART 3: PROCESS

1. The Draft Spatial Plan is subtitled an “Integrated Land-use and Transport Strategy” but it is effectively only a housing density plan. It has no mention of a transport strategy other than that housing intensification should take place close to “a future mass rapid transit route”. No “future mass rapid transit route” is shown on the maps.
2. The consultation process has been unacceptable. It does not meet the standard expected from local government consultation for such an important issue as the future of the city for the next 30 years. Evidence of this includes:
 - 2.1 The Council had clearly not done enough research or preparation before putting documents out for consultation. Throughout the process it has issued new or amended documents without public notice, even to those signed up to the official Planning for Growth ‘newsletter’ since July.

A table showing the changes in documentation of housing typologies for Mt Victoria is used here as an example:

| Housing Type | Full DSP 11 August | Summary DSP 11 August | Summary DSP 25 August | Mt Victoria Oriental Bay Map version 2 | Mt Victoria Oriental Bay Map version 3 Sept 10 |
|--------------|---|--|---|--|---|
| 1 | 1-2 storeys detached, semi-detached infill housing | 1-2 storeys detached, semi-detached infill housing | 1-2 storeys | 1-2 storeys detached, semi-detached infill housing | 1-2 storeys detached, semi-detached infill housing |
| 2 | 2-3 storeys terrace type housing | 2-3 storeys terrace type housing | 2-3 storeys | 2-3 storeys terrace type housing | 2-3 storeys terrace type housing |
| 3 | 3-4 storey apartment buildings | 3-4 storey apartment buildings, may be mixed use | 3-4 storeys | 3 to 4 storey apartment buildings | 3 to 4 storey apartment buildings, may be mixed use |
| 4 | At least 6 storey mixed use and apartment buildings | Mixed use and apartment buildings up to 6 storeys | <u>Type 4a</u> Up to 6 storeys | <u>Type 4a</u> Up to 6 storeys mixed use & apartment buildings | <u>Type 4a</u> Up to 6 storeys mixed use & apartment buildings |
| | | | <u>Type 4b</u> Enable at least 6 storeys | <u>Type 4b</u> Council must enable at least 6 storeys, as per the NPS-UD 2020 | [removed] |

- 2.2 The housing typology map for Mt Victoria has contained a misleading error through all three versions and several rounds of correspondence with council officers did not succeed in providing an adequate explanation or a correction. Colouring on all versions of the map shows Tutchon Avenue included in a character sub-area but officers repeatedly confirmed it was not. There were clearly two opportunities when this could have been corrected as new versions of the map were issued.
- 2.3 The Council has misleadingly spoken and written about needing to provide accommodation for 50,000 to 80,000 people over the next 30 years, when its own highest forecast is for 74,484. This is a material difference. For Council to knowingly inflate numbers in publicity or in other public forums is irresponsible.
- 2.4 The process has been so mismanaged and shoddy that residents trust in the Council to manage it well has been shaken, while the expected transparency has not been forthcoming.

This, added to the well-researched submissions the Council will no doubt receive, should result in a radical re-write of the Draft Spatial Plan and, possibly even, a reset for the whole strategy.

We therefore do not want to see submissions just ‘taken into account’ behind closed doors before publication of a final Spatial Plan without further engagement. We submit that a new scheme for Mount Victoria needs to be developed, based on an expanded set of qualifying matters and that the Council complete a design for this in close consultation with affected stakeholders, while also completing a draft evaluation report in support of it. These documents need to be prepared well in advance of any consultation on proposed revisions to the district plan.

We call for all submissions to be made publicly available, in an accessible manner.

- 2.5 We were advised that there would not be public hearings for submissions on the Draft Spatial Plan and are therefore not requesting this right in our submission. We are disappointed that, unlike most Wellington City Council consultations, there is no opportunity for citizens to speak to their submissions at hearings.

APPENDIX 1

Population Forecast Analysis

This Appendix is largely the content of a paper presented to the Council Strategy and Policy Committee meeting on August 6, 2020.

Key Points

1. All the figures we use below are from the Housing and Business Development Capacity Assessment (HBA), Forecast.id or Statistics NZ.
2. The “Housing Sufficiency” table (see Table 1 below) summarises the key inputs in arriving at Housing (Sufficiency) or the Shortfall/Surplus of Dwellings in Wellington City, which determines what additional capacity may or may not be needed.
3. Population Growth is a key driver of the outcome. The HBA assesses demand for residential dwellings based on two growth scenarios – a “Medium Growth” projection produced by Forecast.id and a “High Growth” projection from Statistics NZ.
4. We conclude that using the Higher Growth projection is not valid:
 - a. The High Growth figure of 74,484 is a very unlikely scenario in statistical terms. In fact, it is as likely to occur as “low growth”, which is circa 20,000.
 - b. The HBA states that the primary reason for using High Growth is that “parts of the Wellington region have been growing at faster rates than expected over recent years” (see Table 2 below).
 - The rate of growth in Wellington City has ebbed and flowed over the last 23 years with periods of higher growth (shown in blue – greater than 1%) and lower growth (shown in green - less than 1%). The lower growth years have outnumbered the higher growth years by 13-10. While there has been a recent period of higher growth, the last two years to 2019 have in fact been a period of population loss. It is also worth noting the higher period of recent growth 2014-17 cited is likely, in expert opinion, to have been a temporary phenomenon related to high levels of migration into the country.
 - Additionally, Policy PC1 of the National Policy Statement (NPS) requires that an oversupply is provided to account for uncertainty in demand and in supply being available, i.e. margins are built into both the demand and capacity numbers to help ensure that there is more than enough capacity to meet demand. It is therefore unnecessary to incorporate a higher growth projection as the NPS methodology provides the necessary margins (see Table 1).

Taking the Statistics NZ medium population growth figure of 46,766, equating that to Housing Demand (adjusted figure of 24,929) and deducting the Housing Capacity (adjusted figure of 20,294), there is a shortfall of 4,635 dwellings over 30 years or just 153 dwellings per year, city wide.

5. The reason for such a low shortfall is that the analysts have calculated there is already capacity for 20,294 dwellings under existing rules i.e. “the population is growing and they will need to be accommodated but provision already exists to satisfy most of this demand”.
6. The planner’s riposte to this might be that in the inner-city areas there is greater demand for what they call “terrace housing” and apartments so, even though the shortfall is only 4,635, there is a high demand for terraced housing/apartments. However, looking at a breakdown of the Forecast.id “medium growth” population projection (see Appendix C), the majority of the increase in population – i.e. 83% - is from a natural increase in the population (not external/internal migration). This is unlikely to be the demographic looking for apartments or terrace housing.

Summary

- Does Wellington City have sufficient feasible residential capacity that will be realised over the next 30 years to meet expected population growth to 2047?

No, it does not, but the shortfall is minor.

- Yet it appears from Summary Spatial Plan that the Council is planning to provide an enormous amount of additional capacity from the outer suburbs, central city to the inner-city heritage or “character” areas.

We question why all this additional capacity is being created when the Council’s own figures show the shortfall is minor. It does not appear to be justified.

- Unfortunately, there are real-world and irreversible outcomes if the plan is implemented as proposed. The outcome for “character” inner city areas could be significant. In the 2019 WCC Planning for Growth Survey “Appropriate management of character protection was the most discussed issue. Adamant opposition to character loss was expressed in around 200 comments, with the main sentiment being that the that the essence of what makes Wellington a great city would be lost if character was not protected”. This is a quote from the Council’s own report.

Table 1 Housing Sufficiency table (summarising how the Demand/Capacity numbers are derived)

| Wellington City - Housing Sufficiency (shortfall/surplus) TOTAL 2017 - 2047 (30 Years) | | | |
|---|-----------|--------------------|----------------------|
| | Incr/Decr | Medium Forecast ID | High Growth Stats NZ |
| 4) Population Growth - Projections (Low Growth circa 20,000) | | 46,766 | 74,484 |
| 3) Housing Demand (New Build Demand) | | | |
| - Required Dwellings | | 21,339 | 32,337 |
| - Adj. Required Dwellings (+20% Short-term & 15% Long-term) | 3,590 | 24,929 | 32,337 |
| 2) Housing Development Capacity (Existing Capacity for New Build) | | | |
| - Plan Enabled Capacity | | 106,411 | 106,411 |
| - Adj. Economically Feasible to Develop (26%) | -78,457 | 27,954 | 27,954 |
| - Adj. Realisation Capacity | - 7,660 | 20,294 | 20,294 |
| 1) Shortfall (Demand less Capacity) - Over 30 Years | | 4,635 | 12,043 |
| 1a) Shortfall (Demand less Capacity) - Average Each Year | | 155 | 401 |
| | | | 260% |

NOTE: All Figures from : Housing and Business Development Capacity Assessment Wellington City Council Report 8 Nov'19

The underlying assumptions about growth are driving a process leading toward reduction in protection for inner city character areas in order to provide intensified development.

Key points to note:

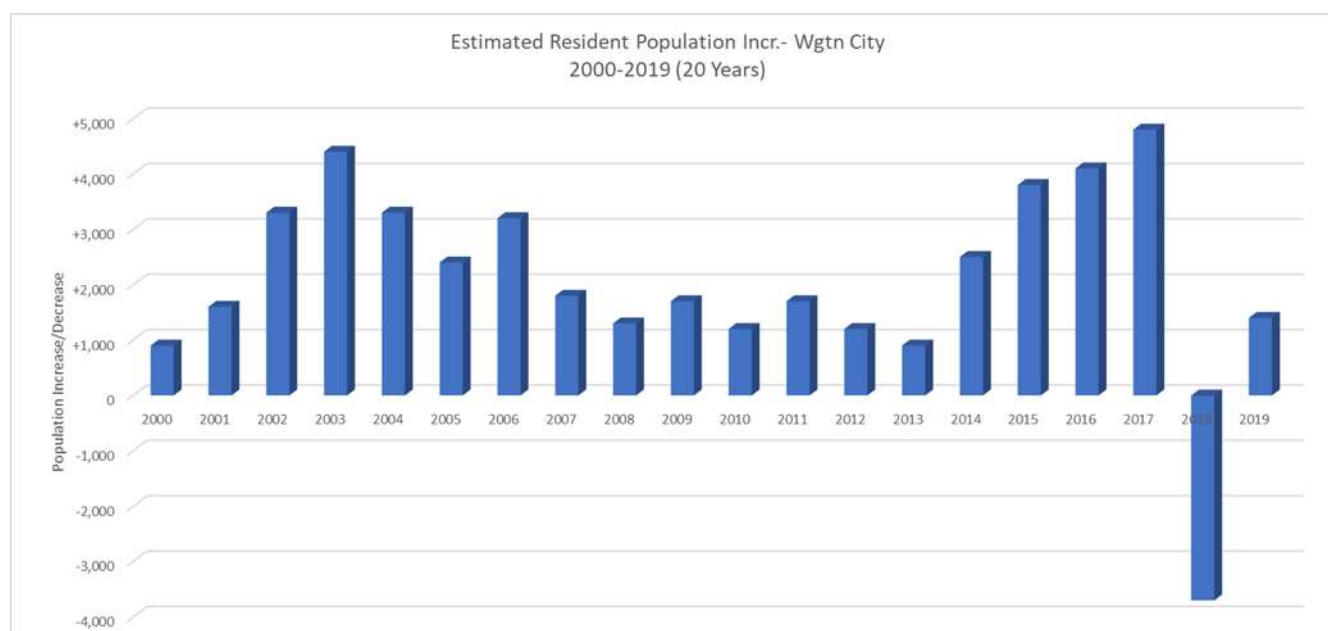
- **The Required Dwellings** - are increased by 3,590 to factor in a “suitable buffer of over-supply” to 24,929 Dwellings.
- **The Housing Development Capacity** - starts at 106,411 & finishes at 20,294.

An economically feasible overlay is applied (at the point in time of the analysis) massively dropping the number to 27,954 dwellings. Then the realisable capacity is applied (recognising that only some will build within the 30-year duration) reducing the capacity by a further 7,660 to 20,294 dwellings.

Table 2 Growth Rates

| Estimated Resident Population (ERP) | | | |
|-------------------------------------|---------|------------------|-------------------|
| Wellington City | | | |
| Year (ending June 30) | Number | Change in number | Change in percent |
| 2000 | 169,500 | +900 | +0.5 |
| 2001 | 171,100 | +1,600 | +0.9 |
| 2002 | 174,400 | +3,300 | +1.9 |
| 2003 | 178,800 | +4,400 | +2.5 |
| 2004 | 182,100 | +3,300 | +1.8 |
| 2005 | 184,500 | +2,400 | +1.3 |
| 2006 | 187,700 | +3,200 | +1.7 |
| 2007 | 189,500 | +1,800 | +0.9 |
| 2008 | 190,800 | +1,300 | +0.7 |
| 2009 | 192,500 | +1,700 | +0.9 |
| 2010 | 193,700 | +1,200 | +0.6 |
| 2011 | 195,400 | +1,700 | +0.9 |
| 2012 | 196,600 | +1,200 | +0.6 |
| 2013 | 197,500 | +900 | +0.5 |
| 2014 | 200,000 | +2,500 | +1.3 |
| 2015 | 203,800 | +3,800 | +1.9 |
| 2016 | 207,900 | +4,100 | +2.0 |
| 2017 | 212,700 | +4,800 | +2.3 |
| 2018 | 209,000 | -3,700 | -1.8 |
| 2019 | 210,400 | +1,400 | +0.7 |

High
Immigration



Source: Statistics New Zealand, Subnational Population Estimates - information releases for 30 June 2013

Compiled and presented in profile.id by .id, the population experts. <https://home.id.com.au>

Table 3 Breakdown of medium population growth statistics

| | | | | | | | |
|--|--|------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| The official population of the Wellington City as of the 30th June 2019, is 210,400 | | | | | | | |
| The Wellington City population forecast for 2020 is 214,537, and is forecast to grow to 248,953 by 2043 | | | | | | | |
| Wellington City | | | | | | | |
| | Component | Total 2019-2043 | 2019 to 2023 | 2024 to 2028 | 2029 to 2033 | 2034 to 2038 | 2039 to 2043 |
| | Births | | 12,191 | 12,475 | 12,620 | 12,842 | 13,290 |
| | Change in persons in non-private dwellings | | 371 | 305 | 245 | 282 | 105 |
| | Deaths | | 5,247 | 5,877 | 6,578 | 7,321 | 7,997 |
| | Natural increase/decrease | 30,396 | 6,943 | 6,597 | 6,042 | 5,521 | 5,292 |
| | Net migration (external & internal) | 6,107 | 2,964 | 980 | -1,305 | 827 | 2,640 |
| | Total population change | | 10,279 | 7,883 | 4,982 | 6,630 | 8,038 |
| | | | 10279 | 7883 | 4982 | 6630 | 8038 |
| <i>Population and household forecasts, 2013 to 2043, prepared by Forecast .id , the population experts, November 2019.</i> | | | | | | | |

APPENDIX 2

**Petition calling on Wellington City Councillors & Mayor
to reject the Spatial Plan proposal
and retain the pre-1930s demolition rule for all of Mount Victoria**

This petition was conducted largely face-to-face, but with some signatures also collected at The Mt Vic Hub and one local business. There was no online version. This method was chosen so that we could engage directly with residents, inform them about the Draft Spatial Plan and so they were clear about what they were signing. As much of Mt Victoria as possible was covered within the limited timeframe.

The action petitioned for was: We, the undersigned Mt Victoria residents, call on WCC Councilors and Mayor to reject the Spatial Plan proposal and retain the pre-1930s demolition rule for all of Mt Victoria.

This statement

Owing to the size of the petition, it is not possible to attach it as an electronic appendix.

It can be accessed at:

<https://www.dropbox.com/sh/srlgmoq7ng04o5f/AADg4ttNJxUyqjllNi1kbshGa?dl=0>

Summary details are:

| MVHS PETITION - WCC Draft Spatial Plan | | |
|---|------------|------------|
| Population Mt Vic - 2018 Census | 4527 | |
| Total Signatures | 752 | |
| Non Mt Vic Residents | <u>67</u> | |
| Mt Vic Residents | 685 | 15% |
| | | |

Submission on Wellington City Council Draft Spatial Plan

This submission is made on my own behalf and I would wish to speak to my submission should this be possible.

Rachel Kay Macfarlane

[REDACTED]

Mt Victoria

Wellington 6011

[REDACTED]

I am opposed to the removal by the Council of the pre-1930 demolition controls in Mount Victoria.

The heritage nature of our suburb is what makes it so liveable. It keeps the housing to a comfortable human scale. It builds a community spirit. It preserves a connection with people who have lived here in the past. It preserves the social history of the area. It is a pity that the City Council does not yet have a system of plaques to acknowledge the roles played by people and their houses in the development of the Wellington City as this history and sense of identity is in danger of being lost.

Most of the pre-1930s houses are attractive and good to live in. They can be modified and modernised without losing their essential character. They can survive earthquakes, when not all multi-story buildings can.

An increase in density can be, and is being achieved, without repeating the mistakes of the past and allowing multi-story buildings to invade the area.

I am opposed to the shrinking and piecemeal approach to the “character areas.”

As drawn in the Council’s Spatial Plan there is no logic to what is included or excluded.

I am in favour of an extension of the “character areas” into a “heritage” category to cover the suburb.

The heritage nature of our suburb is an asset to the city of Wellington. The historic housing stock of Mt Victoria and its unique suburban form are used to promote Wellington, not least by Wellington City Council. The suburb is visited and appreciated by New Zealanders and international tourists.

The Council should continue to recognise the special heritage characteristics of this area and when, taking into account the need for denser development, ensure that it is appropriate to this environment.

A continued emphasis should be placed on streetscape character and building design. Retention of a general character overlay over the suburb would ensure that any new development respects the local streetscapes.

I object to the blanket treatment of Ellice Street as suitable for Type 3 (3-4 Storey apartment buildings) and Type 4b (buildings up to 6 Storeys and mixed use and apartment buildings).

Ellice Street, where we live, is essentially a street of pre-1930 houses forming a coherent streetscape of character houses. Its overall character is still intact. The strong, cohesive architectural character of Ellice Street was recognised by the Board of Enquiry in the decision on the proposed Basin Reserve Flyover. Ellice Street and Wellington East Girls School behind are part of the suburb's wider cityscape when seen from across the city. Ellice Street is a key walking route for tourists travelling from Pukeahu National War Memorial Park to the town belt at the top of Ellice Street to look at the sites used in filming the *Lord of the Rings* series. Our own house at 94 Ellice Street was considered by Charles Fearnley as worthy of inclusion in his book *Vintage Wellington*.

Ellice Street is already a medium density area with a lot of rental properties in high demand for the affordable space and proximity to the city that they provide. Building 4--6 storey apartments in Mt Victoria is unlikely to provide affordable housing that the young and impecunious can afford and will, in fact, expel the many young people currently occupying the large houses that have been divided into multiple flats.

The treatment of Ellice Street Spatial Plan does not take into account the proposed second Mt Victoria tunnel.

The tunnel will have a protection buffer zone around it, which affects houses in Paterson Street, Austin Terrace and Ellice Street. Surely the City Planners do not wish to compromise the ability of the City to improve transport links to the Eastern Suburbs. The NZTA would not want developers to start building multi-storey buildings in this protection area.

I am not against more housing or more affordable housing in Wellington.

But such development should be phased, so that it first takes place in areas which need regeneration e.g. Adelaide Road and from Kent Terrace through to Willis Street. In these areas the effect of multi-storey apartments can be blended with other similar buildings.

Spatial Planning must be underpinned by realistic projections of future growth.

This does not seem to be the case.

Rachel Kay Macfarlane



9th October 2020

Attn: Planning for Growth Team
Draft Spatial Plan review
Wellington City Council

FEEDBACK ON THE DRAFT WELLINGTON CITY SPATIAL PLAN 2020-2050

Introduction

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service set out below provides the following feedback on the Draft Spatial Plan 2020-2050 for Wellington City dated 19th March 2020 (“**draft Spatial Plan**”). We note that Wellington City Council (“**the Council**”) have prepared the Draft Spatial Plan that will sit above and feed into the Wellington City Council District Plan review process currently underway.

Background

1. Kāinga Ora was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown agent and is required to give effect to Government policies.
2. Kāinga Ora consolidates Housing New Zealand Corporation (“**Housing NZ**”), HLC (2017) Ltd and parts of the KiwiBuild Unit and is the Government’s delivery agency for housing and urban development. Kāinga Ora has two core roles:
 - a) Being a world class public housing landlord; and
 - b) Leading and co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and

- b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
5. The public housing portfolio managed by Kāinga Ora in Wellington City comprises approximately 1668 dwellings¹. Wellington City is identified as an area to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.
6. In terms of its role as a public landlord, there has been a marked change in the type of housing that is required by Kainga Ora's tenant base:
- a. Demand in particular for the Wellington city area has increased for apartments, terraced housing and for single bedroom housing required for single persons. Currently the demand for a 1 bedroom typology sits at 62% of the waiting list total.
 - b. As a result the size of many public houses do not match the changing demand for public housing, with a large proportion of the Kainga Ora's housing stock comprising older 3-4 bedroom homes on large lots which can be too large for smaller households and not fit for purpose.
7. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing will require close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.

¹ As of March 2020

Outline of Feedback on the draft Spatial Plan

8. Kāinga Ora thanks Council for the opportunity to provide feedback on the draft Spatial Plan. Kāinga Ora recognises that the draft Spatial Plan out a strategic vision and direction for growth and development within the region over the next 30 years, and will inform planning, investment, and development opportunities in the Wellington City District Plan review.
9. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing. These include the provision of services and infrastructure and how this may impact on Kāinga Ora existing and planned housing, community development and Community Group Housing (“CGH”) suppliers.
10. Kāinga Ora has a shared interest in the community as a key stakeholder, alongside local authorities. Kāinga Ora’s interests lie in the provision of public housing to persons who are unable to be sustainably housed in private sector accommodation, and in leading and co-ordinating residential and urban development projects. Kāinga Ora works with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
11. There is significant potential to better and more efficiently use land across the Wellington City. Kāinga Ora believes there is a significant opportunity to redevelop its land holdings to increase intensity and variety of housing types, and free up under-utilised land for private, affordable and third-sector housing for the benefit (social and economic wellbeing) of the whole community.
12. Kāinga Ora seeks further changes to the Draft Spatial Plan as outlined in the following:
 - a. Attachment 1 – Table – This table has the Kāinga Ora commentary and key recommendations to the Draft Spatial Plan
 - b. Attachment 2 - Maps – These maps are with recommended amendments and changes to the Draft Spatial Plan maps

Next Steps

13. Kāinga Ora welcomes the opportunity to workshop and meet with Council on the feedback provided and seek that Kāinga Ora is engaged in an ongoing manner as the detailed provisions and spatial maps. We would be interested to do this workshop soon.
14. We are of the understanding that hearings will take place in **November 2020** and Kāinga Ora wishes to be heard when these hearings take place.



.....
Brendon Liggett
Development Planning Manager
Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE: Sonia Dolan, Kāinga Ora – Homes and Communities, PO Box 74598, Newmarket, Auckland 1023. Email: developmentplanning@kaingaora.govt.nz. Sonia Dolan: Mobile - 021 198 1825

Attachment 1: Kāinga Ora – Homes and Communities feedback on the Wellington City Council Draft Spatial Plan (“Draft Spatial Plan”)

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| Overall Commentary on the Draft Spatial Plan | <p>Kāinga Ora – Homes and Communities (“Kāinga Ora”) supports the development of the Draft Spatial Plan but recognises that the Draft Spatial Plan is not a complete picture for delivering housing in Wellington City Council (“the Council”).</p> <p>Kāinga Ora recognises that the Draft Spatial Plan has addressed the housing supply and delivery but does not appear to provide for the complete picture for spatial delivery of infrastructure, business land supply, employment, education and health/wellbeing and accessibility to open space. For example, more work is needed to understand the staging and allocation the infrastructure, the pipeline of transport projects and its effects on areas allocated for growth, and how business land will be provided for.</p> <p>In the Draft Spatial Plan, Kāinga Ora considers that further work is necessary to confirm the housing typologies needed over the short, medium and long term. It is noted that the Council considers that larger homes (4+ bedrooms) will comprise nearly 40% of demand in the period 2020 – 2047. Kāinga Ora notes that the market demand and supply models have recently not considered and met the needs of all household cohorts leading to a gap between the housing needs of all people and the supply of housing generally in the market. This growing gap between market supply and housing need has recently resulted in rapid growth in the social housing waiting list. In planning over the short, medium and long term Kāinga Ora considers that additional investigations into the housing needs of all people and supply/demand models are necessary to inform spatial planning that meets the needs of all people.</p> | <p>Kāinga Ora recommends that the Spatial Plan:</p> <ol style="list-style-type: none"> 1. Includes further research and evaluation of the short, medium and long term housing needs by population cohort and how the needs of each cohort are expressed in terms of market demand (overall numbers and typology mix) to allow for spatial planning outcomes that seek to close rather than increase the gap between market activity and actual housing need for all people. 2. Prioritise and allocate infrastructure as identified in the Wellington Water Three-waters Assessment dated November 2019. Strategic direction is required for what the foreseeable infrastructure constraints in the stormwater, potable water, and wastewater networks, and any subsequent upgrades which may be required as a result. There needs to be an action plan to better understand the staging and allocation of the infrastructure in the priority areas. 3. Detail how business land supply is to be provided according to the growth projections for 2020-2050. For example, in relation to business land supply, beyond the City Centre / Central Area, there does not seem to be any spatial allocation of land for business needs. 4. Provides more detail on the projects and sequence of activity to address provision of infrastructure, business land supply, employment, education and health/wellbeing and accessibility to open space. Further assessments will be required and that these assessments would need to integrate with the assigned densities. For example, a calculation should be factored in for what health, education and community facilities are required based on the growth trajectory of housing numbers and typologies and spatial solutions and priorities should be provided in the plan. |
| Goals and Directions | Kāinga Ora supports the overarching high level goals and directions set out in the Draft Spatial Plan, but recommends the following changes to achieve alliance across the Draft Spatial Plan intent. | To help inform and support these goals and directions, Kāinga Ora recommends that the Council ensures that the action plan identifies the range of interventions necessary including provision of targets and timeframes to deliver the Spatial Plan’s intentions. |
| Disjoint between the National Policy Statement on Urban Development 2020 (“NPS-UD”) intent and the extent and scale of intensification areas in the Draft Spatial Plan | <p>Kāinga Ora notes that the Draft Spatial Plan splits areas, outside the City Centre, into inner and outer suburbs. Whereas the Operative Wellington City District Plan (the “District Plan”) clearly sets out a centres hierarchy at section 6 from the Central Area down to the Neighbourhood Centre. This is derived from Centres Policy document dated from 29 August 2008.</p> <p>It is unclear if the Draft Spatial Plan seeks to continue this or seeks to refresh this in a manner consistent with the NPS-UD objectives and policies in regards to well-functioning urban environments and associated hierarchical approach to centres.</p> | <p>Kāinga Ora are of the view that in order to best inform the subsequent District Plan review/s, the Spatial Plan needs to:</p> <ol style="list-style-type: none"> 1. Clearly articulate the hierarchical relationship between the differing centres in a manner consistent with the definition of ‘centre zone’ in the NPS-UD; and 2. Review and reconsider the status of the existing centres in light of NPS-UD objectives regarding well-functioning urban environments. For example, are Johnsonville and Kilbirnie the only ‘metropolitan centres’ for Wellington, Kāinga Ora suggests that Newtown may also be able to be assessed as a ‘metropolitan centre’. |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|---|--|---------------------|--|--------|--|--------|--|--------|----------------------------------|--------|--|--------|--------------------------------|---------|--|--------|---|---------|--|--------|---|---------------------------|---|
| | <p>Kāinga Ora recognises that Policy 3 in the NPS-UD provides for clear requirements for enable intensification of city centres, metro centres, and walkable catchments of the same and walkable catchments of existing / planned rapid transit stops.</p> <p>Kāinga Ora considers that intensification within walkable catchments and in city / other centres has not been sufficiently enabled. The Draft Spatial Plan only seeks to provide for the minimum enablement set out by the NPS-UD and instead considers that in some areas the Council should be seeking to enable more than the minimum.</p> <p>Further Kāinga Ora recognises that within proposed Character Areas and Sub Areas (where pre-1930 demolition controls are intended to apply), Kāinga Ora are of the view that more detailed work is necessary to identify those particular values to be managed within these areas and that a revised management approach is necessary to better provide for growth and development in a manner that is sympathetic to those specifically identified and valued attributes rather than simply manage change via a demolition control related to the age of buildings.</p> | <p>Kāinga Ora recommends that the Spatial Plan:</p> <ol style="list-style-type: none"> 1. Provides for greater enablement of intensification throughout the city, through increased building heights in the key areas: city centre, metro centres (where identified) and walkable catchments as prescribed by Policy 3 of the NPS-UD; and 2. Undertakes further detailed investigation to the proposed Character Areas and identify only those areas with specific attributes that are of value to the area, including a complete review of the management approach relating to controls of buildings constructed prior to 1930 as being a determining matter. In doing so develop a management approach that provides for ongoing growth and development of these communities (including a greater variety of housing types and increased housing quality over time) in a manner that is sympathetic to those values identified for management. | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Disjoint between the National Planning Standards and the proposed zoning and typologies within the Draft Spatial Plan</p> | <p>Kāinga Ora has reviewed the proposed residential land use types against the NPS-UD and National Planning Standards and considers that 7 types are too many. Kāinga Ora recommends that the formulation of these types be changed to simplify the structure and achieve alignment with the principles of the National Planning Standards.</p> <p>Kāinga Ora recommends only 3 residential land use types in the Spatial Plan with an Additional Height Control that can manage height within those areas of the High Density Residential land use type. This will ensure a consistent planning approach and language that will inform the future of the District Plan. A proposed approach to achieve this is recommended by Kāinga Ora.</p> | <p>Kāinga Ora recommends that the residential land use type structure be changed as follows:</p> <ol style="list-style-type: none"> 1. Type 1 – General Residential: maximum of 2 stories; 2. Type 2 – Medium Density Residential: 3 to 4 stories; 3. Type 3 – High Density Residential and Mixed Use: minimum of 5 stories; and 4. Proposed Additional Height Control on ‘Type 3’ – variable heights from 6+ stories (to enable taller buildings to be built in Type 3 locations suitable for higher stories). <p>This will enable a gradation of heights and scales of residential development to be built across the city, around centres and rapid transit stops. Kāinga Ora’s attached maps references these typologies <u>as listed above</u>.</p> <table border="1" data-bbox="1380 1346 2294 1850"> <thead> <tr> <th colspan="2">WCC Draft Spatial Plan</th> <th colspan="2">Kāinga Ora Proposed</th> </tr> </thead> <tbody> <tr> <td>Type 1</td> <td>1-2 storeys detached, semi-detached and infill housing</td> <td>Type 1</td> <td>1-2 storeys detached, semi-detached and infill housing</td> </tr> <tr> <td>Type 2</td> <td>2-3 storeys terrace type housing</td> <td rowspan="2">Type 2</td> <td rowspan="2">3-4 storey terrace and apartment buildings</td> </tr> <tr> <td>Type 3</td> <td>3-4 storey apartment buildings</td> </tr> <tr> <td>Type 4a</td> <td>Up to 6 storey mixed use and apartment buildings</td> <td rowspan="2">Type 3</td> <td rowspan="2">Minimum 5 storeys mixed use and apartment buildings</td> </tr> <tr> <td>Type 4b</td> <td>Enable at least 6 storey mixed use and apartment buildings</td> </tr> <tr> <td>Type 5</td> <td>Up to 8 storeys mixed use and apartment buildings</td> <td>Additional Height Control</td> <td>Variable height areas from 6+ stories (to enable taller buildings to be built in Type 3 locations suitable for higher stories) i.e. 6, 7, 8, 9, 10+ stories</td> </tr> </tbody> </table> | WCC Draft Spatial Plan | | Kāinga Ora Proposed | | Type 1 | 1-2 storeys detached, semi-detached and infill housing | Type 1 | 1-2 storeys detached, semi-detached and infill housing | Type 2 | 2-3 storeys terrace type housing | Type 2 | 3-4 storey terrace and apartment buildings | Type 3 | 3-4 storey apartment buildings | Type 4a | Up to 6 storey mixed use and apartment buildings | Type 3 | Minimum 5 storeys mixed use and apartment buildings | Type 4b | Enable at least 6 storey mixed use and apartment buildings | Type 5 | Up to 8 storeys mixed use and apartment buildings | Additional Height Control | Variable height areas from 6+ stories (to enable taller buildings to be built in Type 3 locations suitable for higher stories) i.e. 6, 7, 8, 9, 10+ stories |
| WCC Draft Spatial Plan | | Kāinga Ora Proposed | | | | | | | | | | | | | | | | | | | | | | | | |
| Type 1 | 1-2 storeys detached, semi-detached and infill housing | Type 1 | 1-2 storeys detached, semi-detached and infill housing | | | | | | | | | | | | | | | | | | | | | | | |
| Type 2 | 2-3 storeys terrace type housing | Type 2 | 3-4 storey terrace and apartment buildings | | | | | | | | | | | | | | | | | | | | | | | |
| Type 3 | 3-4 storey apartment buildings | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type 4a | Up to 6 storey mixed use and apartment buildings | Type 3 | Minimum 5 storeys mixed use and apartment buildings | | | | | | | | | | | | | | | | | | | | | | | |
| Type 4b | Enable at least 6 storey mixed use and apartment buildings | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type 5 | Up to 8 storeys mixed use and apartment buildings | Additional Height Control | Variable height areas from 6+ stories (to enable taller buildings to be built in Type 3 locations suitable for higher stories) i.e. 6, 7, 8, 9, 10+ stories | | | | | | | | | | | | | | | | | | | | | | | |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| Central City | <p>Kāinga Ora generally supports the identification, creation and/or and protection of 'place identifying' and 'place making' features/initiatives set out for the Central City as these are complementary to enhancing amenity and liveability for a compact urban city.</p> <p>Kāinga Ora recognises that place defining (heritage, public buildings) features assist with creating good quality urban environments and that ongoing use and development of these features require specific management (and in some cases protection). Kāinga Ora does however consider that decisions between protection and management require careful consideration balancing all aspects of a place making approach to avoid buildings or features becoming unusable and/or derelict.</p> <p>Kāinga Ora recognises that management of natural hazards impact on the feasibility or appropriateness of development activity in some areas, however Kāinga Ora considers that it is the mitigated risk of the hazard that requires consideration and that in some instances the mitigated risk may or may not require alteration to the intended spatial land-use allocation. It is therefore recommended that Council undertake the identification of areas subject to natural hazards and the potential mitigation approaches to the identified hazard and develop a framework to appropriately manage the risk to people's safety, well-being and property having regard to the potential mitigation options rather than simply reducing landuse intensity in areas subject to a potential hazard.</p> <p>Kāinga Ora generally supports appropriate business activity to be accommodated within the Central City, subject to being in alignment with a city-wide approach to provision of land for business purposes. This will ensure a vibrant and economically prosperous Central City aligned to the goals and directions of the city and Spatial Plan.</p> | <p>Kāinga Ora recommends that the Spatial Plan:</p> <ol style="list-style-type: none"> 1. Retain the place making and place identifying initiative as they are complementary to achieving a liveable compact city; 2. Provide for more intensification within the Central City's Low City areas, particularly that part of the Low City to the south of the High City (please refer to recommendation below); 3. Enable more intensification, through increased maximum building heights, in the proposed Central Area extensions (please refer to recommendation below); 4. Recommends that the Council review the hazard risks and provide a framework to manage these risks to peoples safety, wellbeing and property; and 5. Provide for business and residential activity in the Central City that will create a vibrant and economically prosperous Central City where people can live, work and play. <p>Kāinga Ora generally supports the review of the Low City and enablement of increased heights in this geography, however seeks that a greater level of intensity is enabled in the Low City areas in all respects. This should be read alongside seeking greater levels of enabled intensity in the Inner Suburbs (those within walkable catchment of Central City). Kāinga Ora recommends that the Spatial Plan:</p> <ol style="list-style-type: none"> 1. Increase height limits in Te Aro area, but recommend that the 'target' height be increased from 6-10 stories to 6-15 stories development (i.e. matching 43.8m height limit on edges of High City); 2. Recommend areas around Thorndon (excepting Lambton Harbour Area and existing 50m height limit area as mapped in operative plan) are enabled with similar heights of 6-15 stories; and 3. The principle of the Transitional Heights Area is acknowledged; however, Kāinga Ora is of the view that the application of this should be outside of the Central City and not within the Central City. <p>Kāinga Ora generally supports the proposed extensions of the Central City in the northwest (Thorndon) and south beyond the Basin Reserve toward Newtown; however, considers that the heights to be enabled in these areas should be at least:</p> <ol style="list-style-type: none"> 1. Thorndon: Consistent with Kāinga Ora recommendations made elsewhere around Low City building heights; and 2. South of Basin Reserve: Consistent with Te Aro / Transitional Height Area recommendations. Noted that this area extends towards Newtown, so a compromise height could be achieved. <p><i>See map reference: 710-BH-1.</i></p> |
| Inner Suburbs | <p>Kāinga Ora's review of the Draft Spatial Plan has concluded that the Plan does not adequately enable growth / intensification within either the 400m or 800m walkable catchments of the Central City.</p> <p>While the inner suburbs do contain proposed character areas, Kāinga Ora seeks that improved housing quality, variety in supply, increased</p> | <p>Kāinga Ora recommends that more intensification be enabled in following edges of the Central Area to include:</p> <ol style="list-style-type: none"> 1. South and east (Mt Victoria, Mount Cook, Newtown) beyond the Central City extension; and 2. Northwest (Thorndon) beyond the Central Area extension. |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|---|--|
| | <p>intensity and character is balanced with facilitating and enabling more density whilst managing any identified and valued special attributes. Kāinga Ora seeks a number of spatial mapping changes with regard to residential land use types and heights across the Inner Suburbs. These are articulated in more detail below.</p> <p>Kāinga Ora also supports the removal of pre-1930 demolition controls in character areas and the objective of requiring new developments to achieve good urban form and design, anticipated by the future residential land use types and heights.</p> | <p><i>See map references: 710-UZ-14 through 710-UZ-18.</i></p> |
| Thorndon | <p>Kāinga Ora generally supports the removal of existing character areas (as part of Central City extension over that part of Thorndon to the Wellington Urban Motorway).</p> <p>Kāinga Ora seeks greater enablement of increased intensity within the 400m and 800m walkable catchments of the edge of the Central City. Kāinga Ora notes that the written intent for Thorndon to have 4-6 storey buildings enabled outside of Character Sub Areas is not shown on the spatial maps as part of the draft Spatial Plan.</p> <p>Kāinga Ora seeks spatial map changes to address the written intent and seek further intensification is enabled to support growth and development within the 400m and 800m walkable catchments of the Central City.</p> | <p>Kāinga Ora recommends that at least 5 stories development in height is enabled across Thorndon.</p> <p><i>See map reference: 710-UZ-14 and 710-UZ-08.</i></p> |
| Aro Valley, Holloway Road and The Terrace | <p>Kāinga Ora seeks greater enablement of increased intensity within the 400m and 800m walkable catchments of the edge of Central City and specifically in Aro Valley and The Terrace. Kāinga Ora notes that the written intent for these areas to have 4-6 storey buildings enabled outside of Character Sub Areas is not shown on spatial maps as part of the Draft Spatial Plan.</p> <p>Kāinga Ora seeks spatial map changes to address the written intent and seek further intensification is enabled to support growth and development within the 400m and 800m walkable catchments of the Central City.</p> | <p>Kāinga Ora recommends that:</p> <ol style="list-style-type: none"> 1. Holloway Road area is maintained as a lower intensity area; and 2. Outside of Holloway Road, at least 5 stories development is enabled. <p><i>See map reference: 710-UZ-15.</i></p> |
| Mt Victoria and Oriental Bay | <p>Kāinga Ora generally supports the greater enablement of increased intensity within the 400m and 800m walkable catchments of the edge of Central City. Kāinga Ora notes that the written intent for these areas to have 4-6 storey buildings enabled outside of Character Sub Areas is not shown on the spatial maps as part of the Draft Spatial Plan.</p> <p>Kāinga Ora seeks spatial map changes to address the written intent and seek further intensification is enabled to support growth and development within the 400m and 800m walkable catchments of the Central City.</p> | <p>Kāinga Ora recommends that at least 5 stories development is enabled across Mt Victoria and Oriental Bay and in key areas, additional height control of 6+ stories is enabled.</p> <p><i>See map reference: 710-UZ-18.</i></p> |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| Mount Cook and Arlington | <p>Kāinga Ora generally supports the extension of Central City along the edge and towards Mount Cook to better align with the planned outcomes for Central City extensions.</p> <p>Kāinga Ora seeks the greater enablement of density within a walkable catchment of edge of Central City. Kāinga Ora supports the greater enablement of increased intensity within the 400m and 800m walkable catchments of the edge of Central City.</p> | <p>Kāinga Ora seeks the retention of the proposed extension of Central City along the edge and towards Mount Cook.</p> <p>Kāinga Ora recommends that at least 5 stories development is enabled across Mount Cook and Arlington and in key areas, additional height control of 6+ stories development is enabled.</p> <p><i>See map reference: 710-UZ-16.</i></p> |
| Newtown | <p>Kāinga Ora generally supports the extension of Central City along edge / towards Newtown to better align with planned outcomes for Central City extensions.</p> <p>Kāinga Ora seeks the greater enablement of increased intensity within Newtown, given Newtown's proximity to the Central City and proposed stop on the planned rapid transit network. Newtown is planned to accommodate a new rapid transit stop that aligns with the definition of a rapid transit stop under the NPS-UD. There is also potential for Newtown to be identified as a metropolitan centre, located outside of the Central City, which in itself would align with the policies of the NPS-UD to seek higher residential development (of at least 6 stories).</p> | <p>Kāinga Ora seeks the retention of the proposed extension of Central City along the edge and towards Newtown.</p> <p>Kāinga Ora recommends that at least 5 stories development is enabled across Newton and in key areas, such as around the planned rapid transit stop and centre, additional height control of 6+ stories development is enabled.</p> <p>Kainga Ora suggests that Council consider if Newtown should become a metropolitan centre.</p> <p><i>See map reference: 710-UZ-17.</i></p> |
| Berhampore | <p>Kāinga Ora generally supports increased heights to provide for development of at least 6 stories along the existing and proposed rapid transit network in Berhampore and around Berhampore centre.</p> <p>Kāinga Ora seeks the greater enablement of density within Berhampore, given Berhampore's proximity to the Central City and proposed stop on the planned rapid transit network. Berhampore is planned to accommodate a new rapid transit stop that aligns with the definition of a rapid transit stop under the NPS-UD.</p> | <p>Kāinga Ora recommends that at least 5 stories development is enabled across Berhampore and in key areas, such as around the planned rapid transit stop and centre, additional height control of 6+ stories development is enabled.</p> <p><i>See map reference: 710-UZ-09.</i></p> |
| Outer Suburbs | <p>Kāinga Ora's review of the Draft Spatial Plan has concluded that the Plan does not adequately enable growth / intensification within either the 400m or 800m walkable catchments of the centres of the Outer Suburbs or rapid transit stops in these communities.</p> <p>While the outer suburbs do contain proposed character areas, Kāinga Ora seeks that improved housing quality, variety in supply, increased intensity and character is balanced with facilitating and enabling more density whilst managing any identified and valued special attributes. Kāinga Ora seeks a number of spatial mapping changes with regard to residential land use types and heights across the Inner Suburbs. These are articulated in more detail below.</p> <p>Kāinga Ora also supports the removal of pre-1930 demolition controls in character areas and the objective of requiring new developments to</p> | <p>Kāinga Ora recommends that greater levels of intensification be provided for and enabled within the 400m and 800m walkable catchments of the Outer Suburbs centres and rapid transit stops along the network. In doing so, Kāinga Ora seeks that the transport park and ride services around the existing rapid transit stops is upgraded and identified as projects within the implementation of the Spatial Plan.</p> |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|---|
| | achieve good urban form and design, anticipated by the future residential land use types and heights. | |
| Tawa | Kāinga Ora generally supports increased heights to provide for development of at least 6 stories around the existing rapid transit stop at Tawa. Tawa is an existing rapid transit stop that aligns with the definition of a rapid mass transit stop under the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Tawa and in key areas, such as around the existing rapid transit stop, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-02 and 710-UZ-01.</i> |
| Linden | Kāinga Ora generally supports increased heights to provide for development of at least 6 stories around the existing rapid transit stop at Tawa. Linden and Kenepuru is an existing rapid transit stop that aligns with the definition of a rapid mass transit stop under the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Linden and in key areas, such as around the existing rapid transit stop of Linden and Kenepuru within Wellington City, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-01.</i> |
| Churton Park | Kāinga Ora generally supports increased heights to provide for development in Churton Park. | Kāinga Ora seeks the retention of the proposed intensification and height in Churton Park. <i>See map reference: 710-UZ-02a.</i> |
| Johnsonville | Kāinga Ora generally supports increased heights to provide for development of at least 5-6 stories around Johnsonville centre and existing rapid transit stop. Johnsonville is an existing rapid transit stop that aligns with the definition of a rapid mass transit stop in accordance with the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Johnsonville and in key areas, such as around the existing rapid transit stop of Johnsonville, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-03.</i> |
| Newlands | Kāinga Ora generally supports increased heights to provide for development in Newlands. | Kāinga Ora seeks the retention of the proposed intensification and height in Newlands. <i>See map reference: 710-UZ-03a.</i> |
| Khandallah | Kāinga Ora generally supports increased heights to provide for development of at least 6 stories around the existing rapid transit stop at Khandallah, Box Hill and Simla Crescent. All of these stops are existing rapid transit stops that align with the definition of a rapid mass transit stop in accordance with the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Khandallah and in key areas, such as around the existing rapid transit stop of Box Hill, Simla Crescent and Khandallah, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-04.</i> |
| Ngaio | Kāinga Ora generally supports increased heights to provide for development of at least 6 stories around the existing rapid transit stop at Ngaio. Ngaio is an existing rapid transit stop that aligns with the definition of a rapid mass transit stop in accordance with the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Ngaio and in key areas, such as around the existing rapid transit stop of Ngaio, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-05.</i> |
| Crofton Downs | Kāinga Ora generally supports increased heights to provide for development of at least 6 stories around the existing rapid transit stop at Crofton Downs. Crofton Downs is an existing rapid transit stop that aligns with the definition of a rapid mass transit stop in accordance with the NPS-UD. | Kāinga Ora recommends that at least 5 stories development is enabled across Crofton Downs and in key areas, such as around the existing rapid transit stop of Crofton Downs, additional height control of 6+ stories development is enabled. <i>See map reference: 710-UZ-06.</i> |

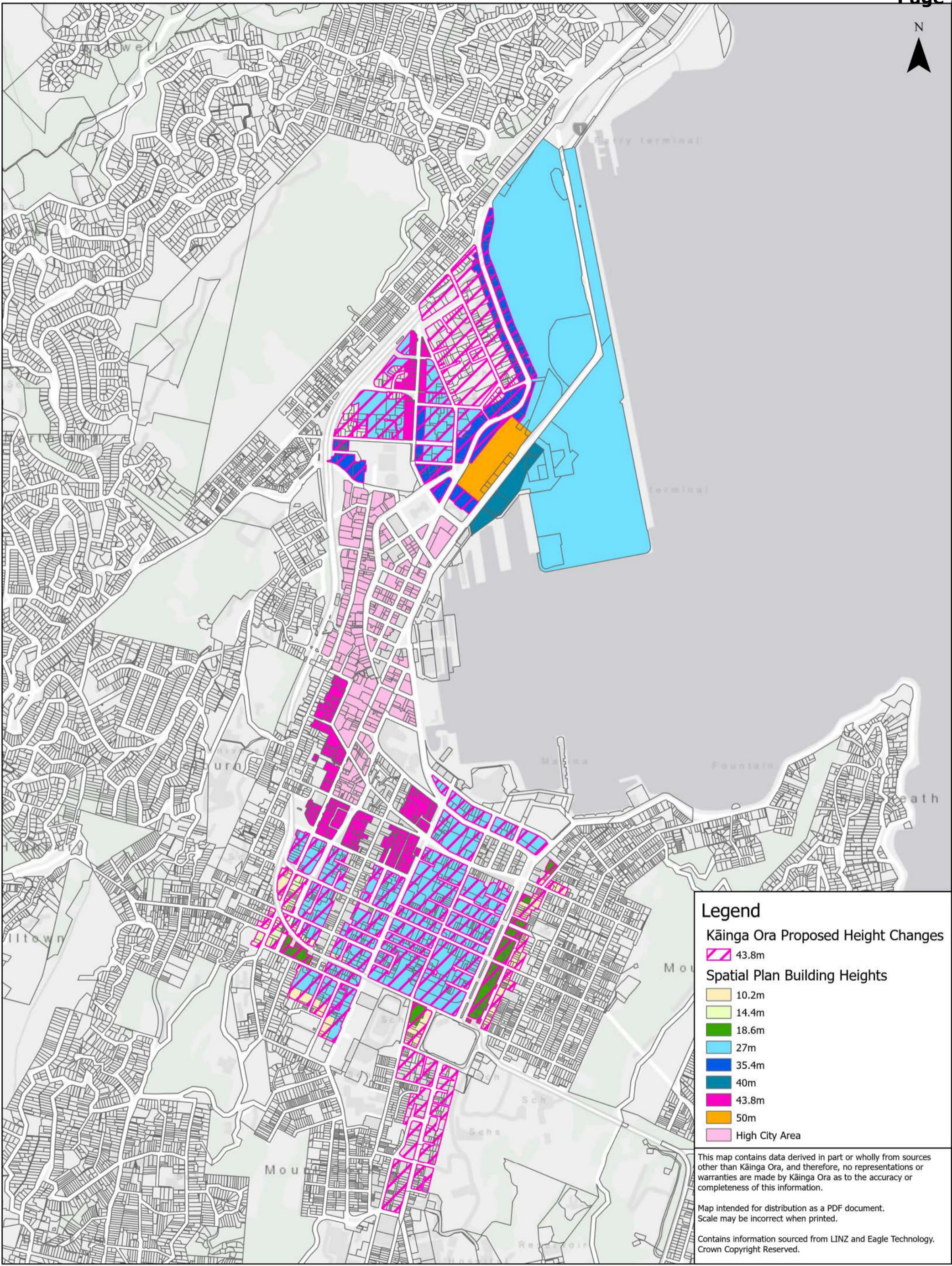
| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|---|--|
| Karori | Kāinga Ora generally supports increased heights and residential intensification along rapid transit networks, centres, amenities and schools located in Karori. | Kāinga Ora recommends that at least 5 stories development is enabled across Karori, and in some locations, adjacent to proposed high density residential areas, schools and along key public transport routes, at least 3-4 stories development is enabled. <i>See map reference: 710-UZ-07 and 710-UZ-08.</i> |
| Kelburn | Kāinga Ora generally supports increased heights and residential intensification in Kelburn. | Kāinga Ora recommends that in some locations, adjacent to proposed high density residential areas, schools, open spaces, community facilities and along key public transport routes, at least 3-4 stories development is enabled. <i>See map reference: 710-UZ-08a.</i> |
| Hataitai | Kāinga Ora generally supports increased heights to provide for development in Hataitai. | Kāinga Ora seeks the retention of the proposed intensification and height in Hataitai. <i>See map reference: 710-UZ-08b.</i> |
| Northland | Kāinga Ora generally supports increased heights and residential intensification around centres, amenities and schools located in Northland. | Kāinga Ora recommends that in some locations, adjacent to proposed high density residential areas, schools, open spaces, community facilities and along key public transport routes, at least 3-4 stories development is enabled. <i>See map reference: 710-UZ-08.</i> |
| Kilbirnie | <p>Kāinga Ora generally supports increased heights and residential intensification in Kilbirnie, especially if Kilbirnie is considered to be a 'sub-regional' centre that could be seen as a metropolitan centre outside of the Central City and is planned to accommodate a new rapid transit stop in the future. Under the NPS-UD, higher residential intensification is to be enabled around rapid transit stops and Kāinga Ora would support such intensification in Kilbirnie.</p> <p>Kāinga Ora recognises that management of natural hazards impact on the feasibility or appropriateness of development activity in some areas such as Kilbirnie, however Kāinga Ora considers that it is the mitigated risk of the hazard that requires consideration and that in some instances the mitigated risk may or may not require alteration to the intended spatial appropriateness of land-use allocation. It is therefore recommended that Council undertake the identification of areas subject to natural hazards and the potential mitigation approaches to the identified hazard and develop a framework to appropriately manage the risk to people's safety, well-being and property having regard to the potential mitigation options.</p> | <p>Kāinga Ora recommends that:</p> <ol style="list-style-type: none"> 1. At least 5 stories development is enabled across Kilbirnie, and in key areas, such as around the existing sub-regional centre and proposed future rapid transit stop in Kilbirnie, additional height control of 6+ stories development is enabled; 2. Adjacent to proposed high density residential areas, schools, open spaces, community facilities and along key public transport routes, at least 3-4 stories development is enabled; and 3. The Council review the hazard risks and provide a revised framework to manage these risks to peoples safety, wellbeing and property that does not unduly or inappropriately apply more restrictive land use allocation without reference to the potential mitigation options. 4. The Council consider Kilbirnie as a metropolitan centre <p><i>See map reference: 710-UZ-10.</i></p> |
| Miramar | Kāinga Ora generally supports increased heights and residential intensification in Miramar, especially if Miramar is planned to accommodate a new rapid transit stop in the future. Under the NPS-UD, higher residential intensification is to be enabled around rapid transit stops and Kāinga Ora would support such intensification in Miramar. | <p>Kāinga Ora recommends that:</p> <ol style="list-style-type: none"> 1. At least 5 stories development is enabled across Miramar, and in key areas, such as around the proposed future rapid transit stop in Miramar, additional height control of 6+ stories development is enabled; and 2. Adjacent to proposed high density residential areas, schools, open spaces, community facilities and along key public transport routes, at least 3-4 stories development is enabled. |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| | | <i>See map reference: 710-UZ-12.</i> |
| Lyll Bay | <p>Kāinga Ora generally supports increased heights and residential intensification in Lyll Bay.</p> <p>Kāinga Ora recognises that management of natural hazards impact on the feasibility or appropriateness of development activity in some areas such as Lyll Bay, however Kāinga Ora considers that it is the mitigated risk of the hazard that requires consideration and that in some instances the mitigated risk may or may not require alteration to the intended spatial appropriateness of land-use allocation. It is therefore recommended that Council undertake the identification of areas subject to natural hazards and the potential mitigation approaches to the identified hazard and develop a framework to appropriately manage the risk to people's safety, well-being and property having regard to the potential mitigation options.</p> | <p>Kāinga Ora recommends that:</p> <ol style="list-style-type: none"> 1. At least 5 stories development is enabled across Lyll Bay, and in key locations, such as along Endeavour Street, additional height control of 6+ stories development is enabled; 2. Adjacent to proposed high density residential areas, schools, open spaces, community facilities and along key public transport routes, at least 3-4 stories development is enabled; and 3. Recommends that the Council review the hazard risks and provide a revised framework to manage these risks to peoples safety, wellbeing and property that does not unduly or inappropriately apply more restrictive landuse allocation without reference to the potential mitigation options. <p><i>See map reference: 710-UZ-11.</i></p> |
| Brooklyn | Kāinga Ora generally supports increased heights to provide for development in Brooklyn. | <p>Kāinga Ora seeks the retention of the proposed intensification and height in Brooklyn.</p> <p><i>See map reference: 710-UZ-11a.</i></p> |
| Island Bay | Kāinga Ora generally supports increased heights to provide for development in Island Bay. | <p>Kāinga Ora seeks the retention of the proposed intensification and height in Island Bay.</p> <p><i>See map reference: 710-UZ-11b.</i></p> |
| Opportunity Sites | <p>Kāinga Ora generally supports the identification of all four key locations and the Future Mass Rapid Transport Station Precincts for the development of a masterplan and rezoning:</p> <ul style="list-style-type: none"> • Upper Stebbings Valley and Glenside West • Lincolnshire • Te Motu Kairangi / Miramar | <p>Kāinga Ora recommends:</p> <ol style="list-style-type: none"> 1. That a master-planning exercise be expedited to properly inform the current District Plan review; 2. That a master-planning aligns with the proposed Action Plan objectives (as sought in this submission) and the NPS-UD objectives and policies on residential intensification; 3. That the Council through its master-planning exercise identifies potential new and existing infrastructure, facilities, schools and amenities that may be required or could be leveraged-off in the area; 4. That the Council provides clarity on sequencing for the greenfield opportunities, or at least identification of what areas or features within a particular area are to be sequenced first e.g. Glenside West prior to Upper Stebbings; 5. That any master-planning optimises existing rapid transit stops and connections through to other stops and service networks including the 400m and 800m walkable catchments around the rapid transit stops; and 6. That engagement with key stakeholders is done early and as part of the master-planning exercise to ensure any landowner aspirations is considered alongside urban regeneration objectives of these areas. For example, Kāinga Ora notes that the Department of Corrections is a significant land owner within the Glenside West area and their land provides a critical linkage between Upper Stebbings and Takapu Station. <p><i>Miramar - see map reference: 710-UZ-12.</i></p> |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| | | |
| | <ul style="list-style-type: none"> • Strathmore Park <p>Kāinga Ora generally supports the identification of Strathmore Park for the development of a master-planning exercise and/or place based plan exercise that will expedited to properly inform the current District Plan Review.</p> | <p>As recommended above, Kāinga Ora seeks:</p> <ol style="list-style-type: none"> 1. That a master-planning exercise for Strathmore Park be expedited to properly inform the current District Plan review and any proposed rezoning to be included in the upcoming Draft District Plan; 2. That a master-planning aligns with the proposed Action Plan objectives (as sought in this submission) and the NPS-UD objectives and policies on residential intensification; 3. That in undertaking a master-planning exercise in this geography that the Council undertakes this in collaboration with key landowners including Kainga Ora; 4. That the Council through its master-planning exercise identifies potential new and existing infrastructure, facilities, schools and amenities that may be required or could be leveraged-off in the area; 5. That the Council along with Wellington Water undertake a detailed assessment of the existing three-waters (water, stormwater, wastewater) network capacity to determine the level of investment required to service the projected growth; 6. That any master-planning optimises existing and future rapid transit stops and connections through to other stops and service networks including any 400m and 800m walkable catchments around these rapid transit stops; and 7. Recommend that Get Wellington Moving prioritise the mass transit route to extend to Strathmore Park and/or provide connections to rapid transit service. The improvement to the public transport links would optimise and provide for growth within the Strathmore area. |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|---|--|
| | | <i>See map reference: 710-UZ-13.</i> |
| Opportunity Sites | <ul style="list-style-type: none"> • Future Mass Transit (via Let's Get Wellington Moving) <p>Kāinga Ora generally supports the concept of a mass transit route and the benefits it can provide to Wellington City and the Greater Wellington Region.</p> | <p>Kāinga Ora recommends:</p> <ol style="list-style-type: none"> 1. That the Council provides clarity on the proposed route of the rapid transit network include any new or future transit stops in the Spatial Plan and as part of the District Plan Review; 2. That the future rapid transit service actively provides for or extend to include the 'Strathmore Park from/to Miramar and/or Airport' area (depending on exact terminus); and 3. Identify the 400m and 800m walkable catchments around the proposed transit stops to enable higher residential density to be located in close proximity to any proposed rapid transit service. |
| Natural and Open Spaces | <p>Kāinga Ora generally supports the ongoing provision of natural and open space to complement the built environment and enhance the livability of the city / sense of place / character, particularly where they are in close proximity to intensified urban areas.</p> <p>Kāinga Ora also generally supports the identified hierarchy of natural and open spaces to be protected and enhanced and the ongoing investment in open space networks and uptake of multi-use facilities.</p> | <p>Kāinga Ora recommends:</p> <ol style="list-style-type: none"> 1. That the Spatial Plan outlines the hierarchy of green spaces and status of standalone guidance documents; 2. That the Council through any master-planning and any structure planning in greenfield areas and opportunity sites identifies appropriate levels of open space that meet the projected growth needs, based on international best practice according to area required per capita; 3. That the Spatial Plan provides direction to how the city plans to minimise impacts on the natural environment, such as green infrastructure, planting and ecological restoration works; 4. That the Spatial Plan expands the local parks network (city and neighbourhood reserves) to align with planned growth demands and needs; and 5. That Council clarity and consistency in guidance / expectations on what measures are anticipated and that these are guidelines / assessment criteria, and not highly prescriptive standards unless substantiated. |

| Issues identified in the Draft Spatial Plan | Kāinga Ora feedback | Recommendation/s |
|---|--|--|
| Action Plan | <p>Kāinga Ora generally supports the high level principle of <i>good quality</i> intensification in Central City and along key transit routes as articulated in this submission and in a manner that is consistent with the NPS-UD and National Planning Standards.</p> <p>Kāinga Ora generally supports:</p> <ul style="list-style-type: none"> - the intent to promote good design guidance through non regulatory means and welcomes the opportunity to be involved in place based planning processes around areas of intensification and where Kāinga Ora's interests are / will be (e.g. brownfield and greenfield areas), - the resolution of investment is critical to realising any development potential that the Spatial Plan / District Plan could allow; and - enabling and providing for a range of housing typologies that can enable and support social and affordable housing including Papakāinga housing. <p>However, Kāinga Ora is concerned with the lack of detail around the proposed rapid transit network and stops, and what this means for the future redevelopment of these urban areas in the Draft Spatial Plan.</p> | <p>Kāinga Ora recommends:</p> <ol style="list-style-type: none"> 1. The Spatial Plan is amended as per the feedback provided by Kāinga Ora and in a manner consistent with the NPS-UD and National Planning Standards requirements; 2. That the Council expedites the master-planning of opportunity sites and greenfield areas to inform the current District Plan Review underway; 3. That a range of non-RMA and RMA tools be used to achieve good design outcomes, universal access and good urban environmental outcomes, inclusive of place-based planning processes to inform greenfield and regeneration developments; 4. That early prioritisation of, and sourcing of funding for, supporting infrastructure (three waters, transport), schools and community facilities is identified. For example, schools or medical clinics; these will require other government organisations and departments to be involved in the long-term planning and funding of services in new and growing urban areas. 5. That the details of the specific route of the proposed rapid transit network including stops are provided for along with the future residential development potential in the Spatial Plan and District Plan Review; 6. That Council ensures that the process of identification and protection of places of cultural and historic significance is set out in accordance with what is deemed appropriate under s.6(f) of the RMA. The Council would need to provide sound evidence base to any new / revised character areas whilst recognising the need to intensify urban areas; 7. That Council reviews its Development Contributions Policy to respond to the growth planned and infrastructure necessary to support increased intensity within the city or in future greenfield areas. Kāinga Ora would welcome any opportunities to engage further with Council on any future revisions to the Development Contributions Policy. |
| Other aspects of Action Plan | <p>Kāinga Ora generally supports measures:</p> <ul style="list-style-type: none"> - to promote and secure better management of water / stormwater, but this needs to be matched by catchment management solutions led by Council inclusive of upgrades to hard infrastructure. - that acknowledge and protect significant landscapes and biodiversity areas, for their enhancement of quality of life and also for future of intensified neighbourhoods. - to enhance the public realm and promote the regeneration of areas of change in the Central City using both regulatory and non-regulatory tools; and - including the investigation into and confirmation of risks associated with climate change, other natural hazards, and associated impacts on the unmitigated risk on the anticipated urban form, transport networks and infrastructure. | <p>Kāinga Ora recommends:</p> <ol style="list-style-type: none"> 1. The Spatial Plan is amended as per the feedback provided by Kāinga Ora and in a manner consistent with the NPS-UD and National Planning Standards requirements; 2. That the Council leads the delivery of stormwater infrastructure to ensure a coordinated and consistent delivery; 3. That in managing the needs of infrastructure servicing requirements that the Council considers holistic catchment based solutions rather than solely site by site mitigation and management, this may necessitate Council undertaking physical upgrades to facilitate improvements in overall network performance and capacity. |



- Legend**
- Kāinga Ora Proposed Height Changes**
- 43.8m
- Spatial Plan Building Heights**
- 10.2m
 - 14.4m
 - 18.6m
 - 27m
 - 35.4m
 - 40m
 - 43.8m
 - 50m
 - High City Area

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

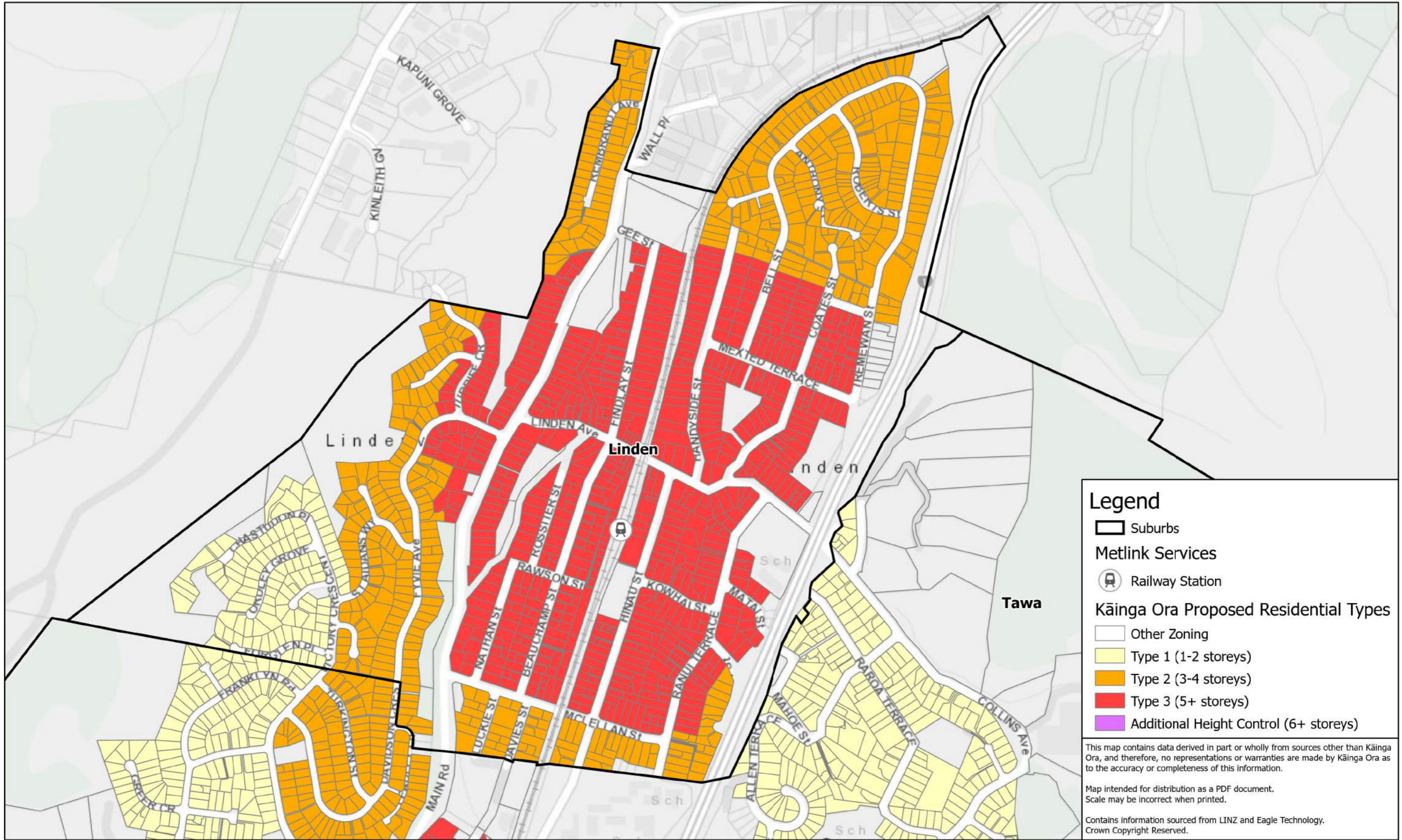
Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.

Scale @ A3: 1:15,000
 0 100 200 400
 Meters

Central Area Building Heights 710 - BH - 1
 Kāinga Ora Proposed Changes to WLG Draft Spatial Plan





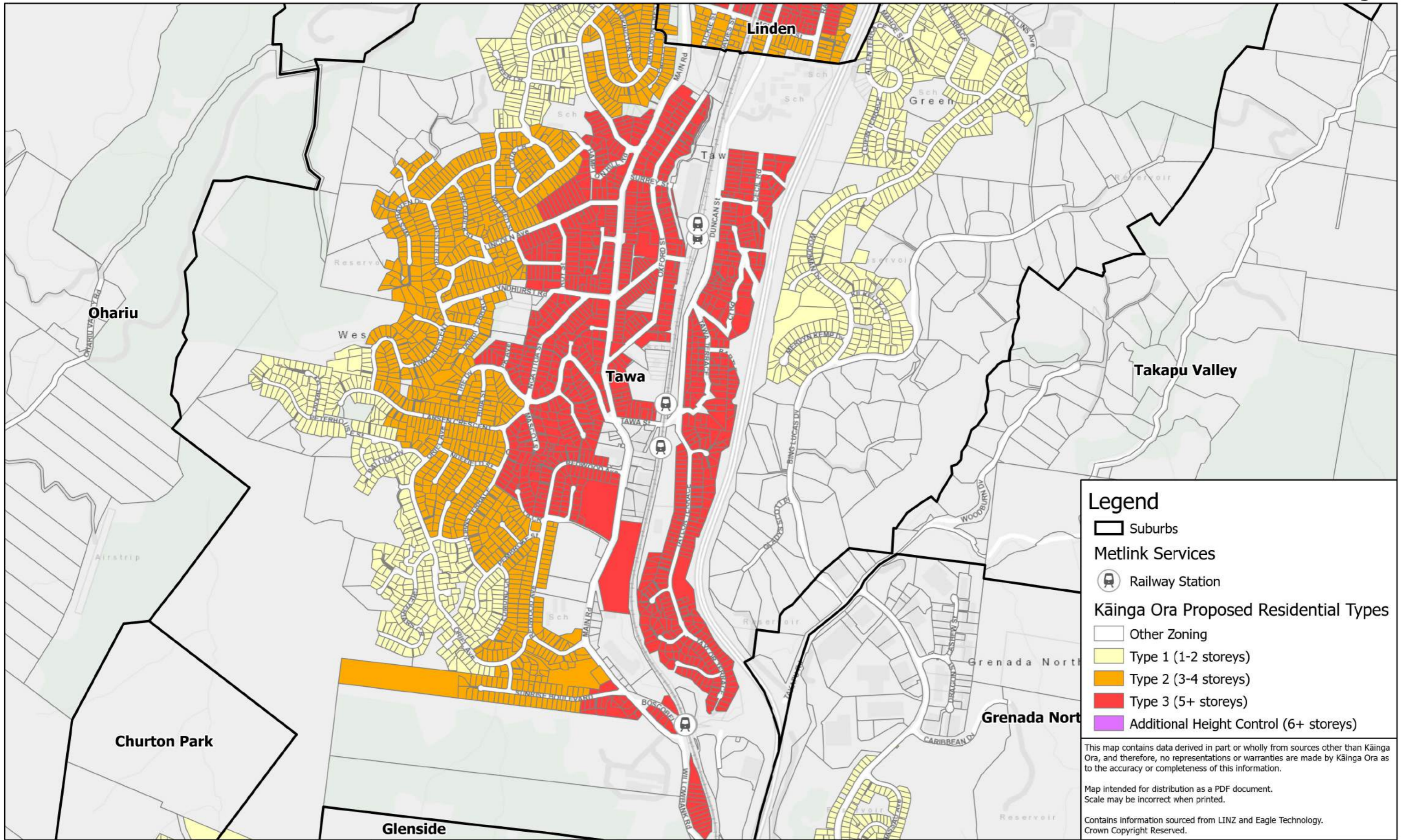
Scale @ A3: 1:7,500

Linden

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-1



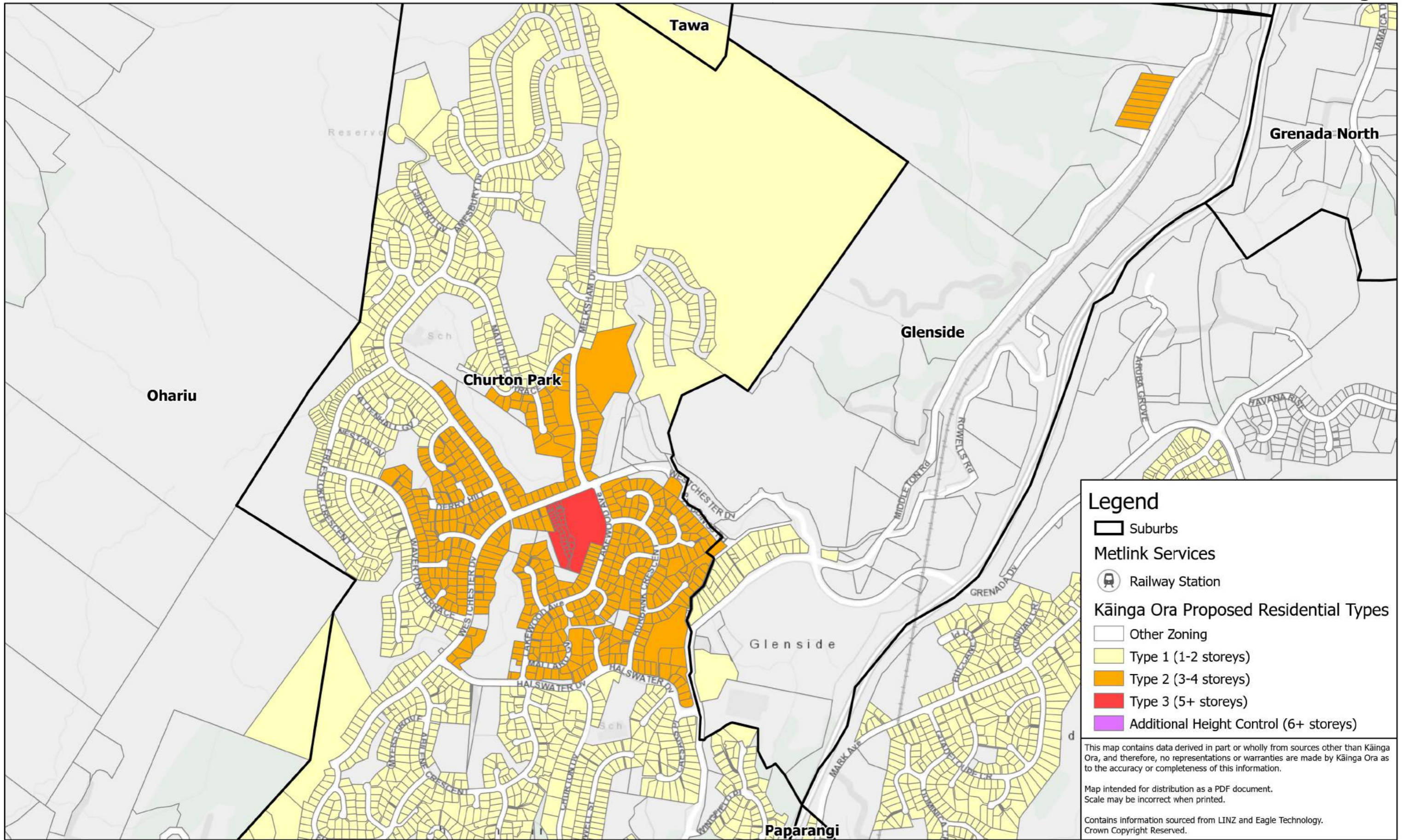


Scale @ A3: 1:12,500

Tawa
 Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-2



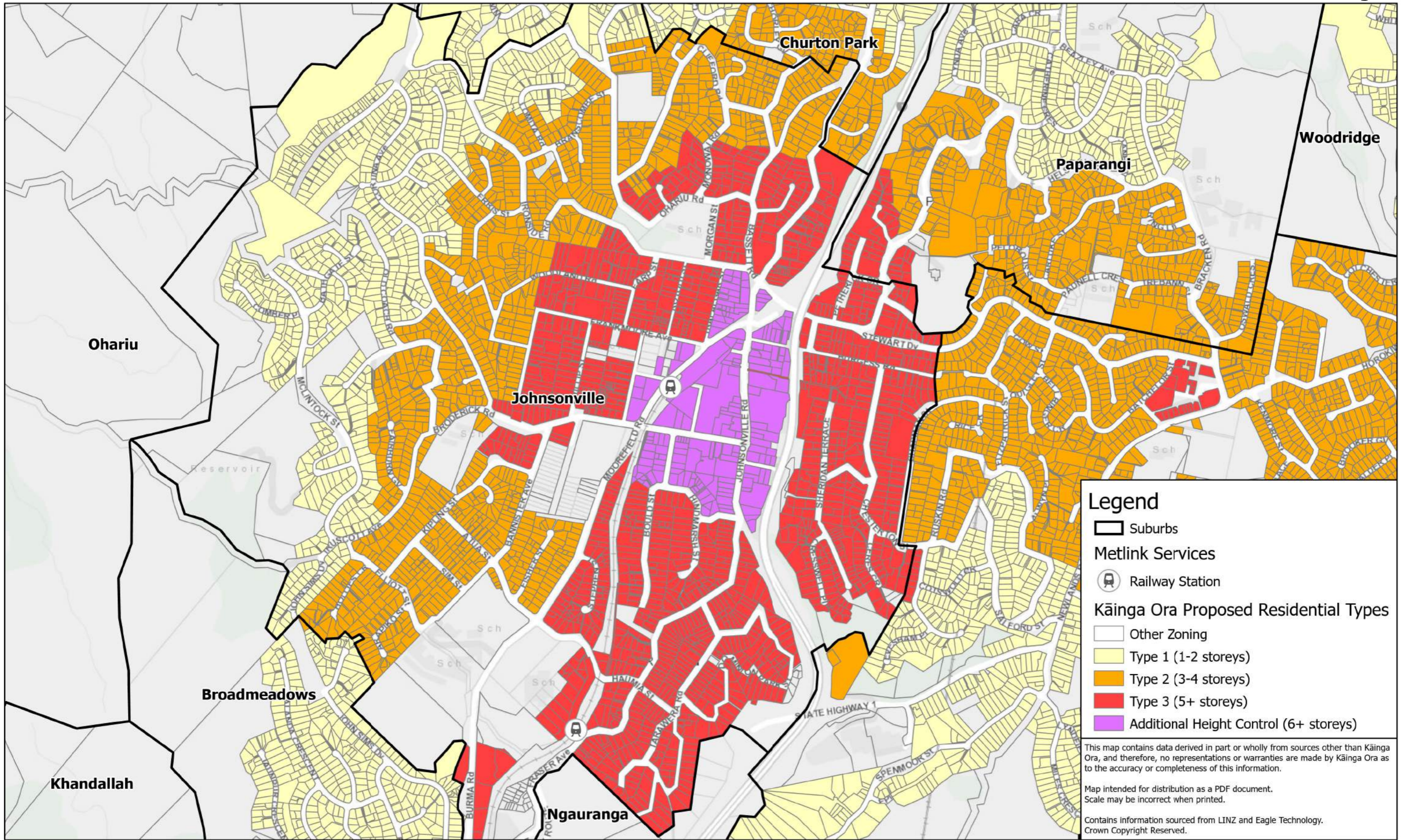


Scale @ A3: 1:10,000

Churton Park
 Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.

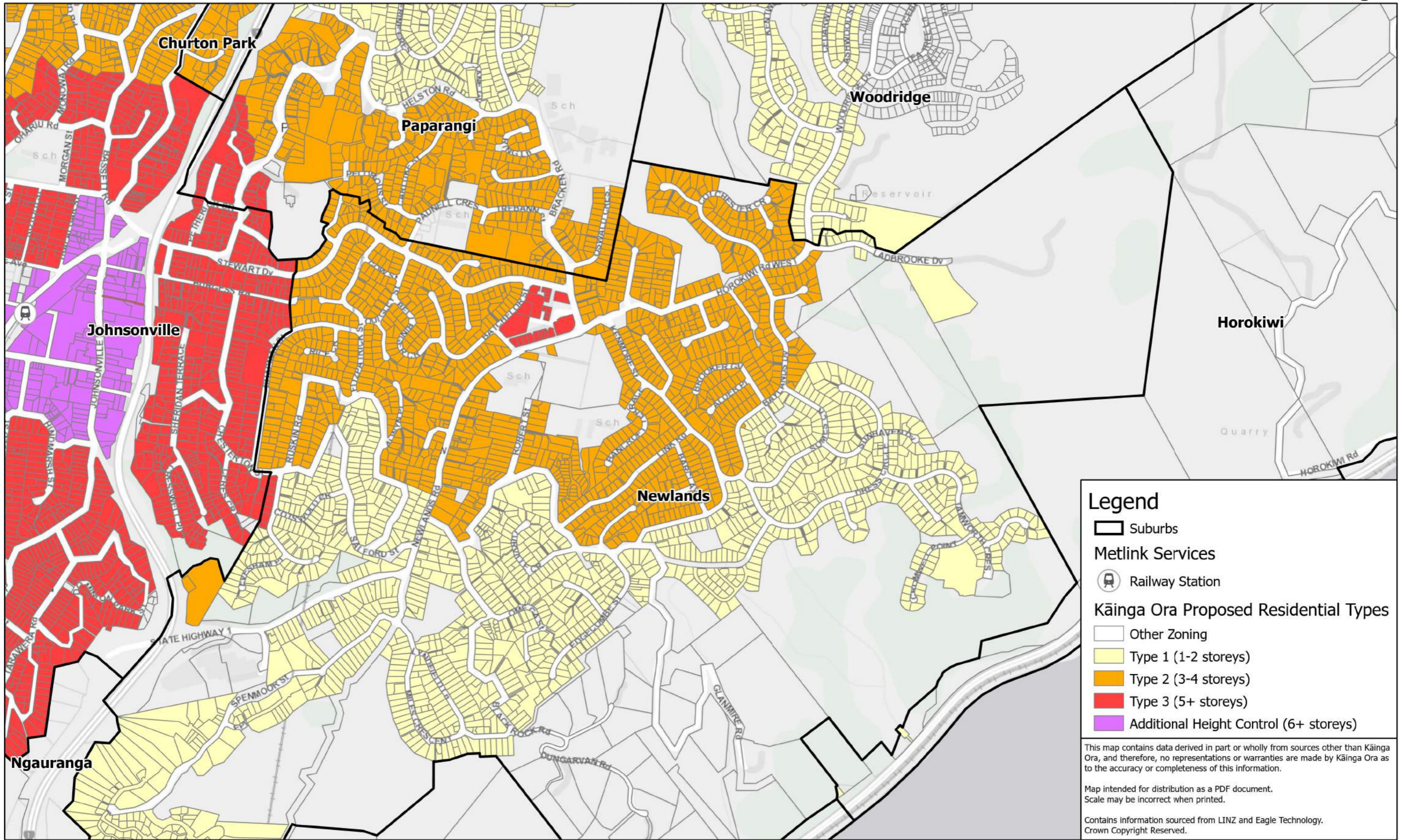


Scale @ A3: 1:10,000

Johnsonville
Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-3





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document.
Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology.
Crown Copyright Reserved.



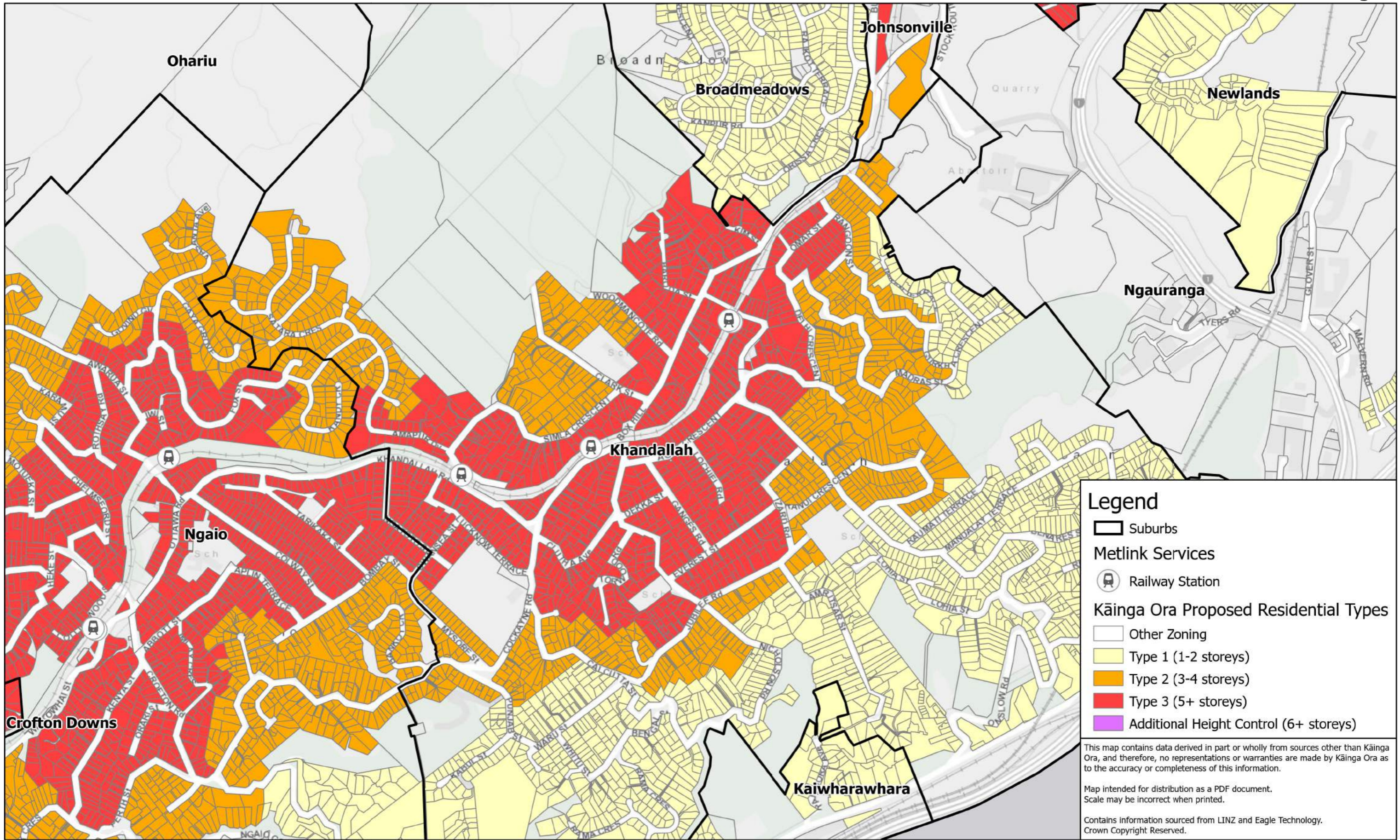
Scale @ A3: 1:10,000

Newlands

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-





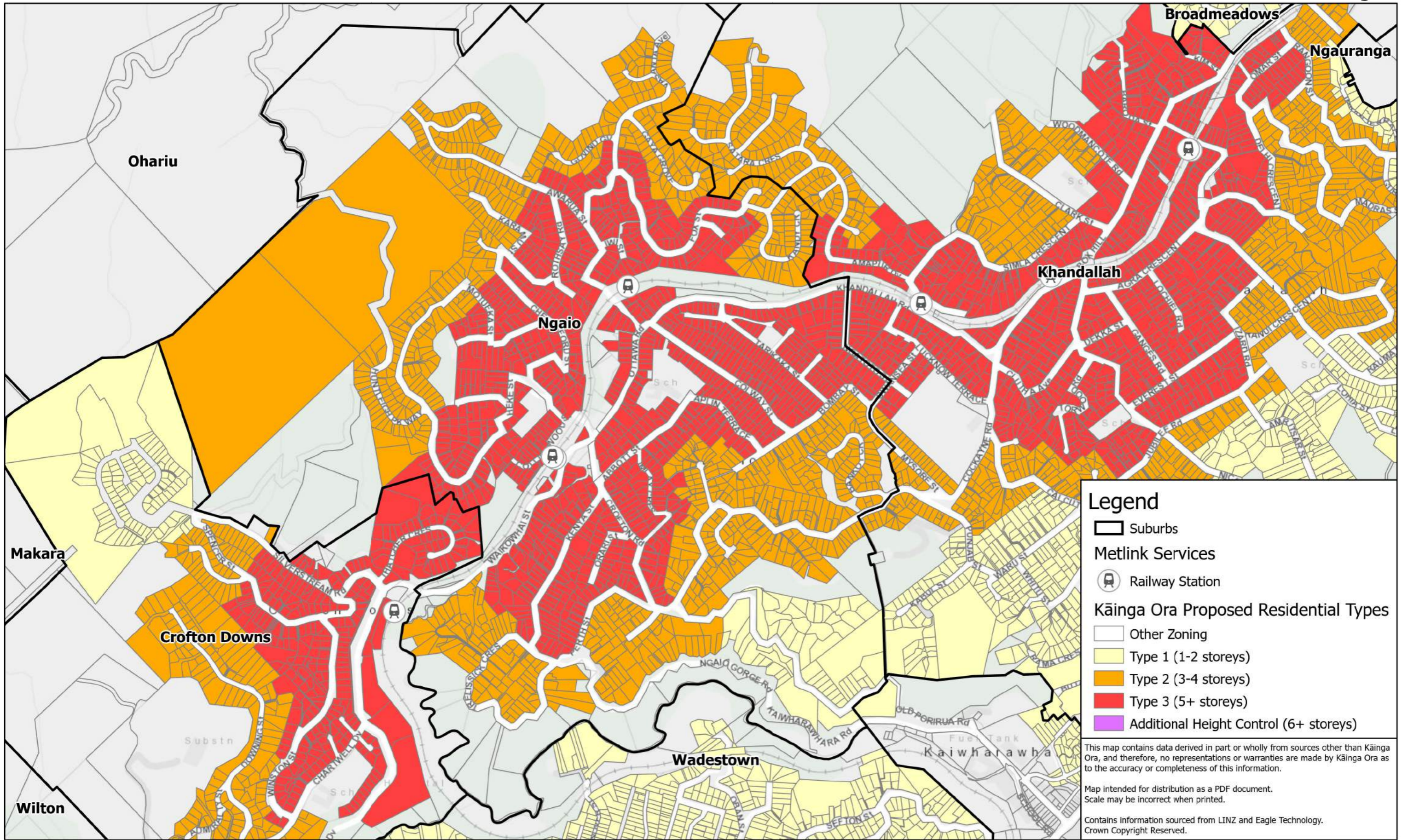
Scale @ A3: 1:10,000

Khandallah

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-4



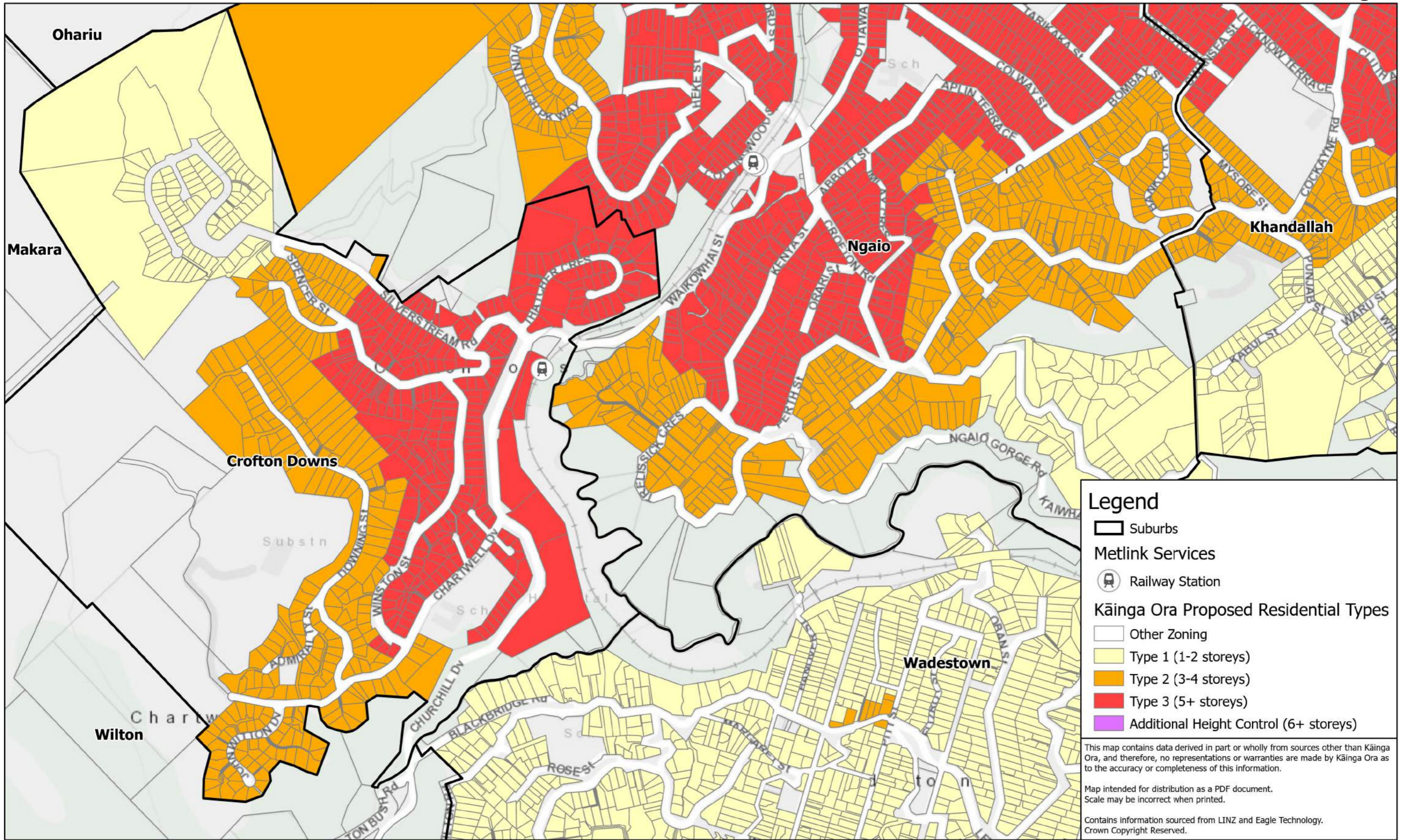


Scale @ A3: 1:10,000

Ngaio
Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-5





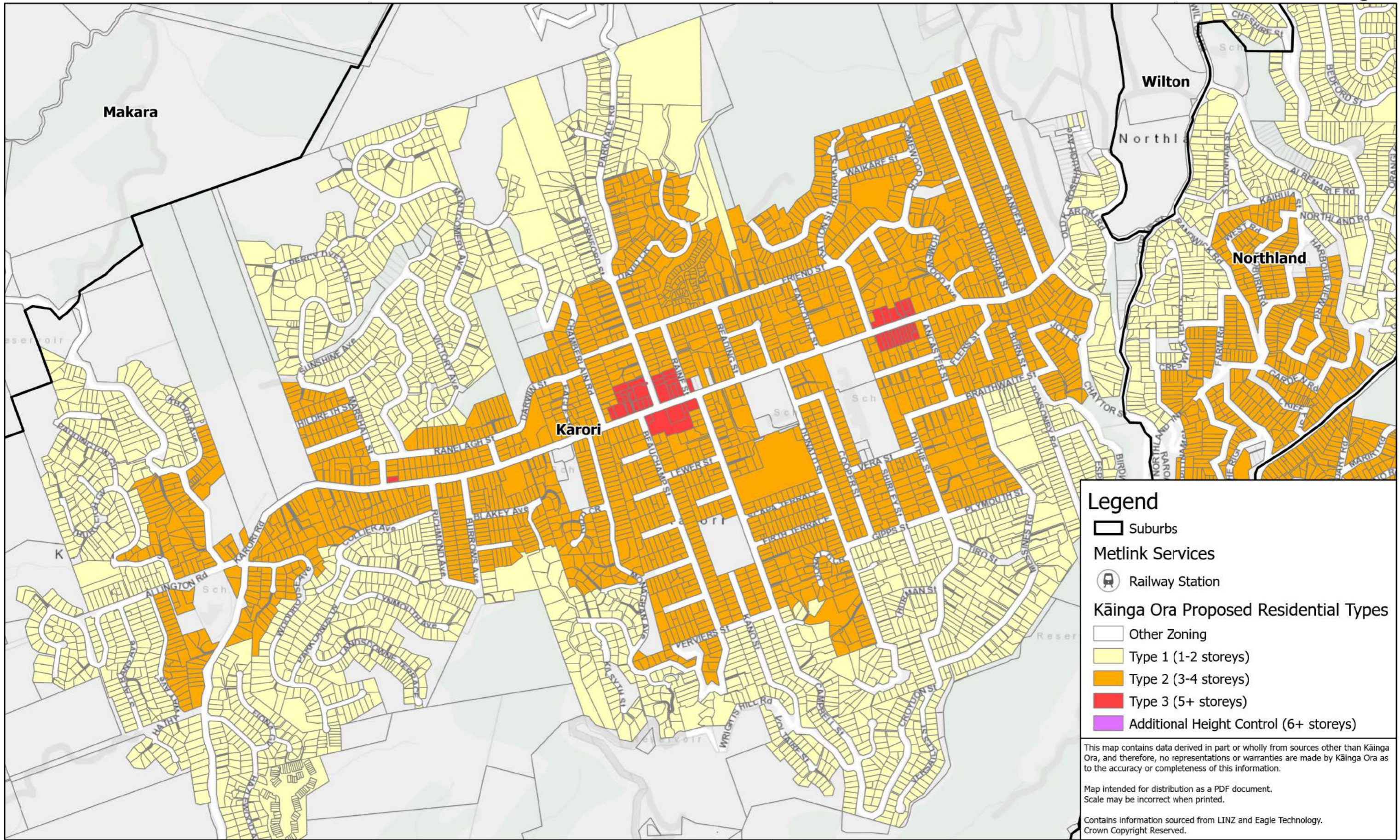
Scale @ A3: 1:7,500

Crofton Downs

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-6





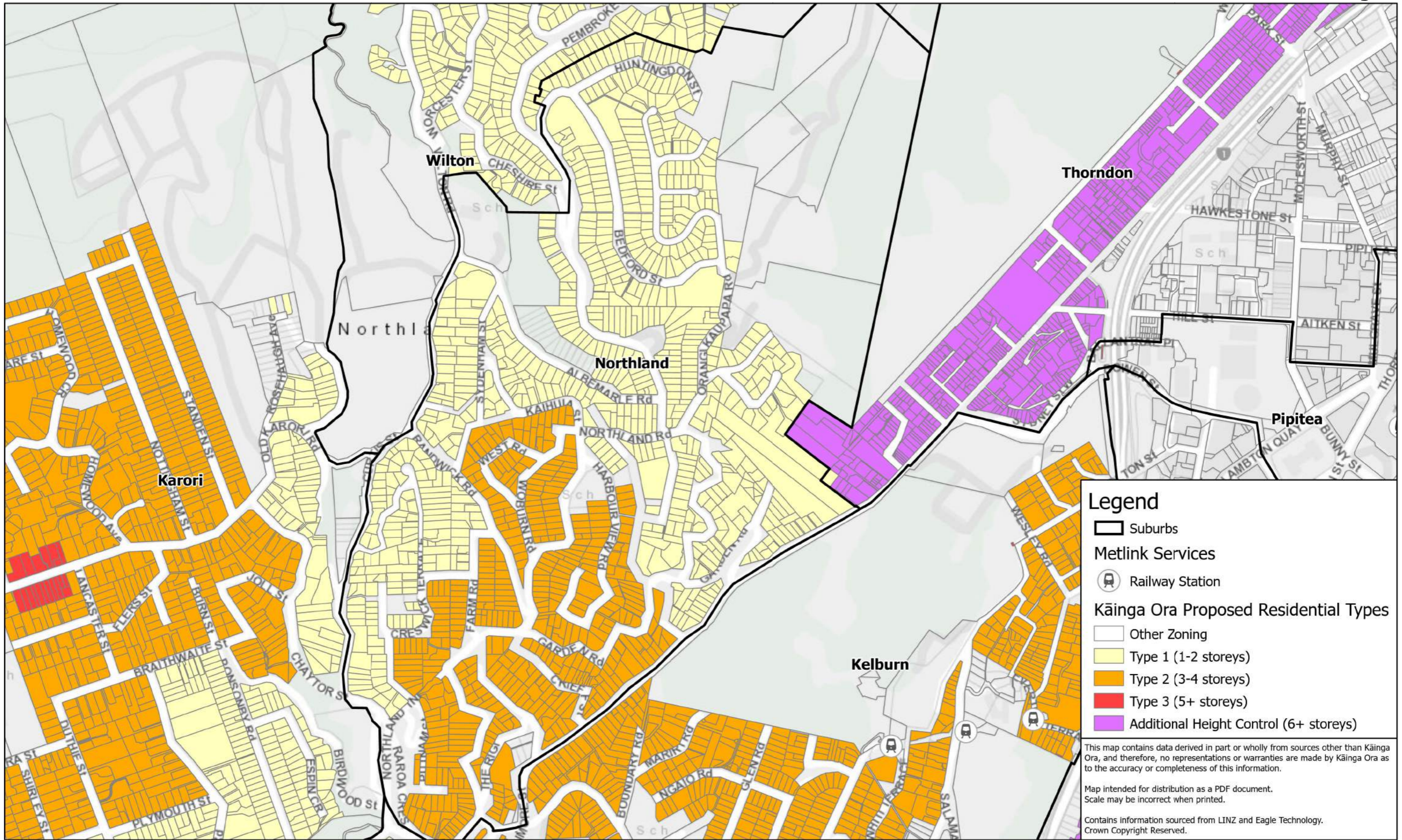
Scale @ A3: 1:10,000

Karori

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-7





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.

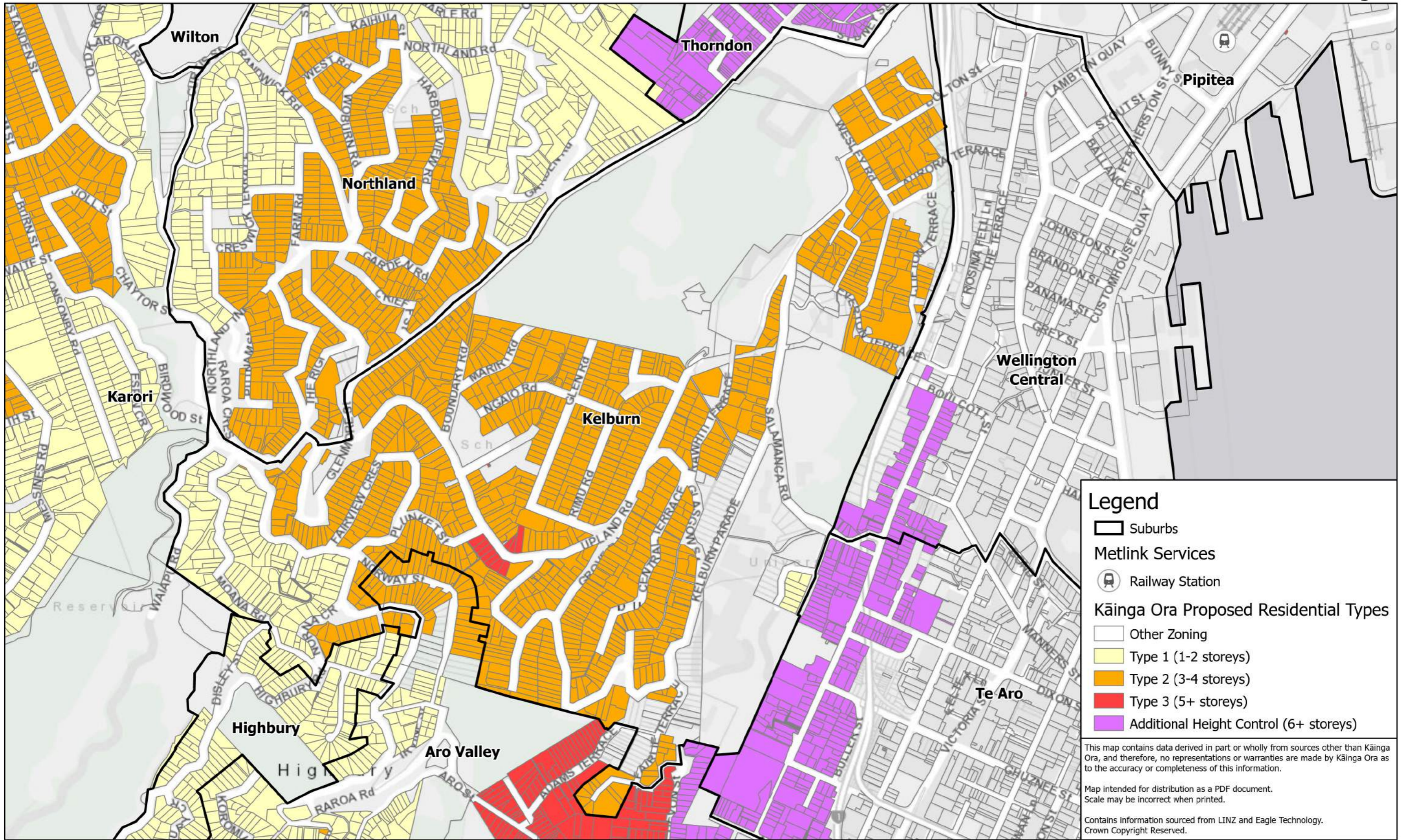


Scale @ A3: 1:7,500

Northland
Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-8





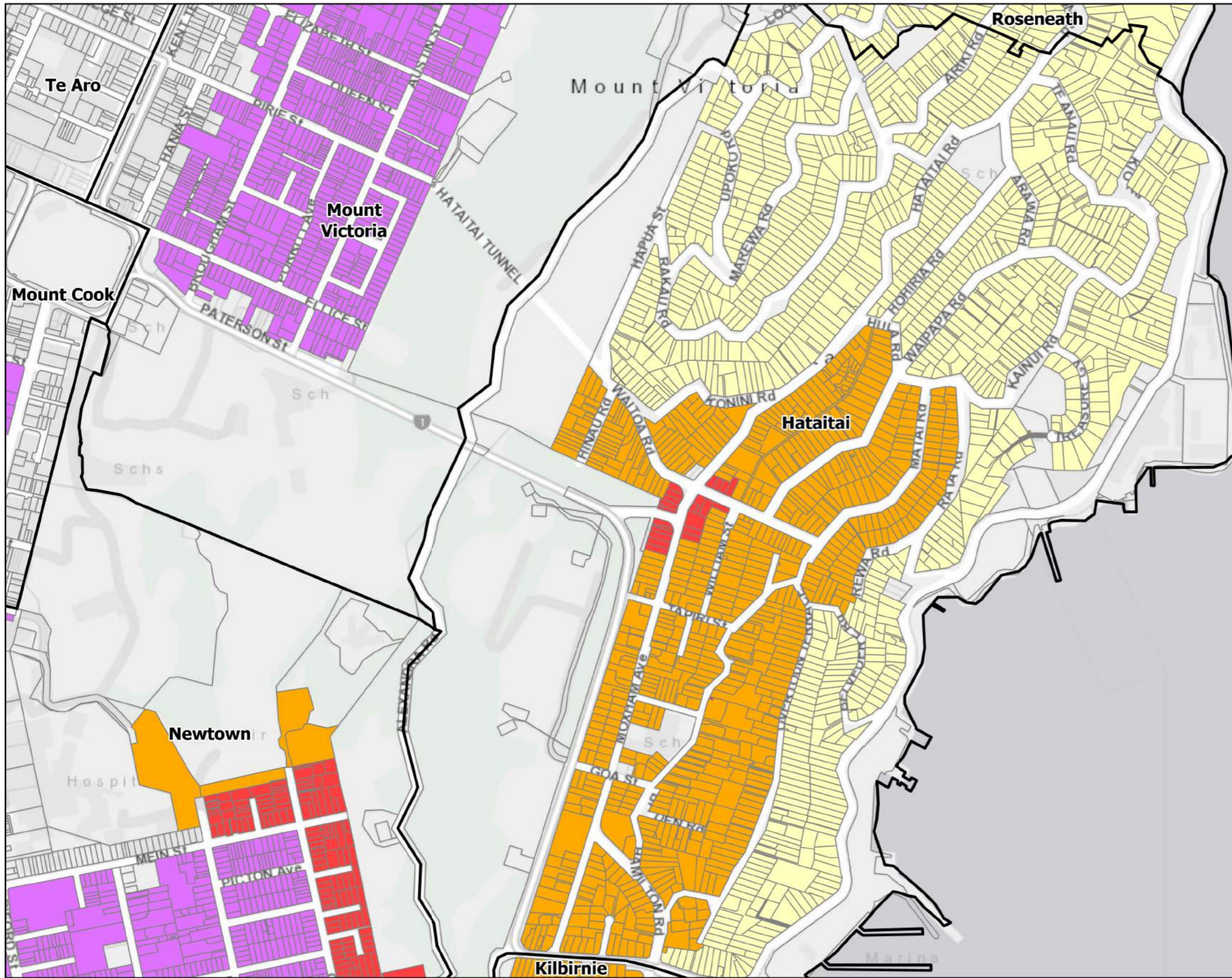
Scale @ A3: 1:7,500

Kelburn

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

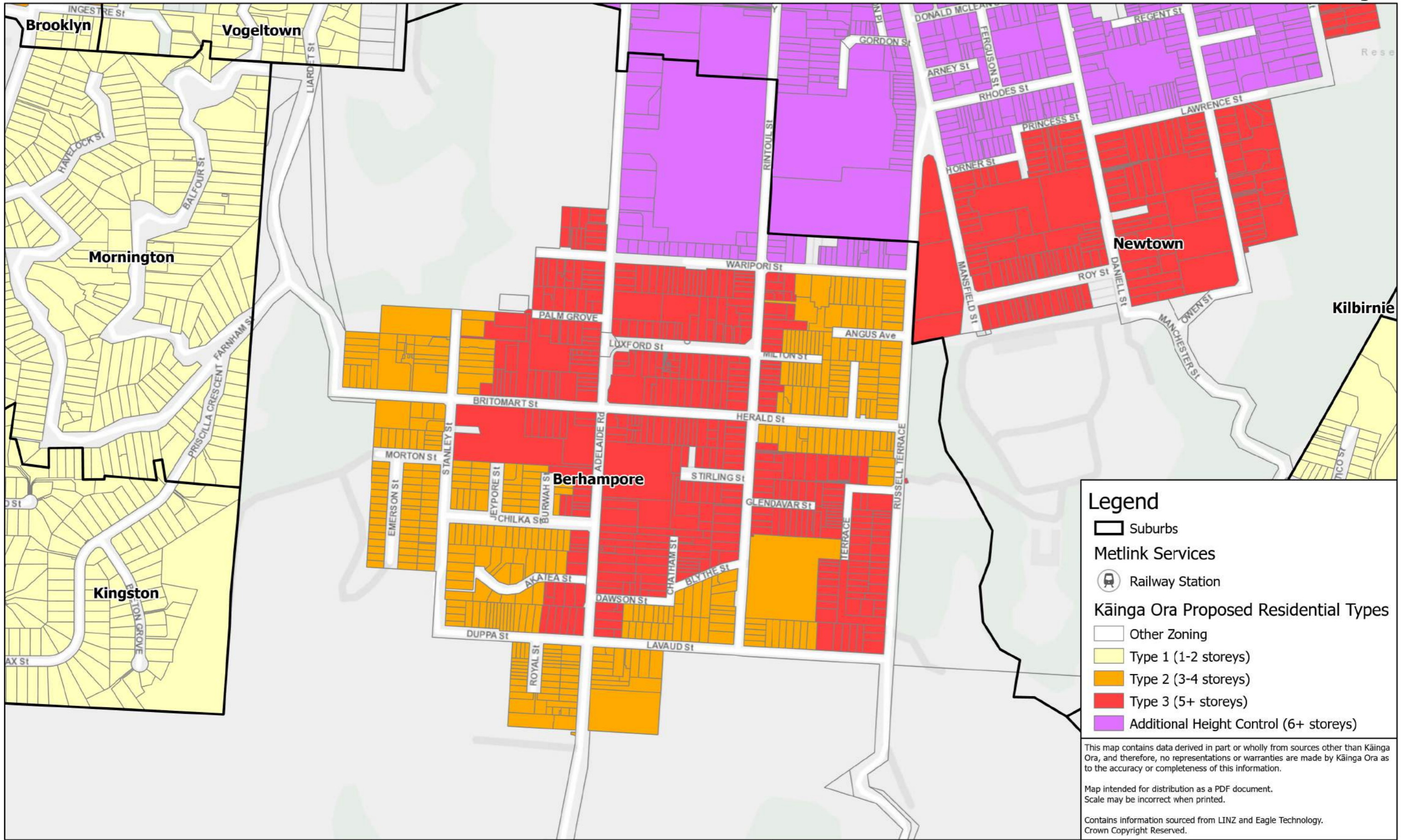
Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.



Scale @ A3: 1:7,500





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.



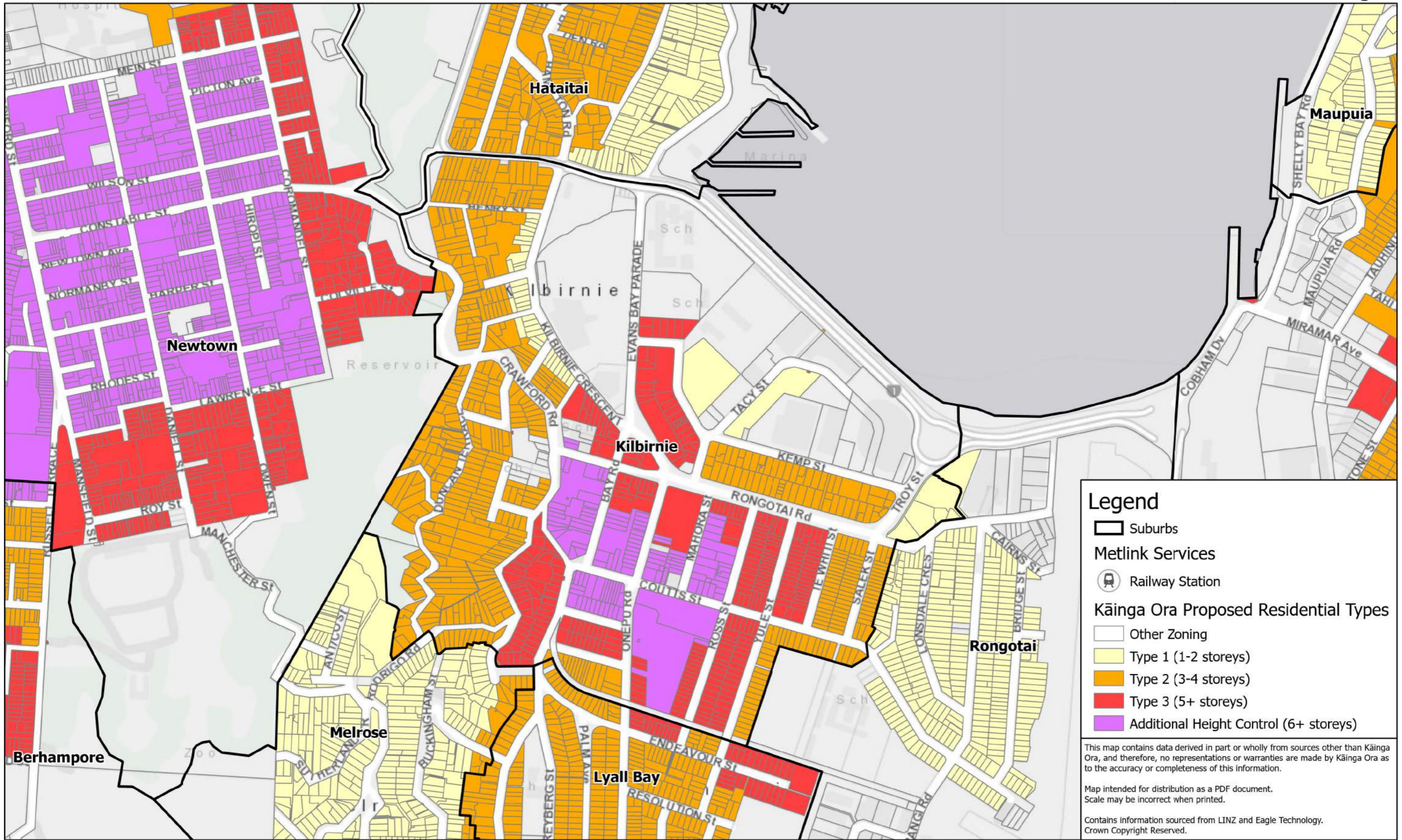
Scale @ A3: 1:5,000

Berhampore

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-9





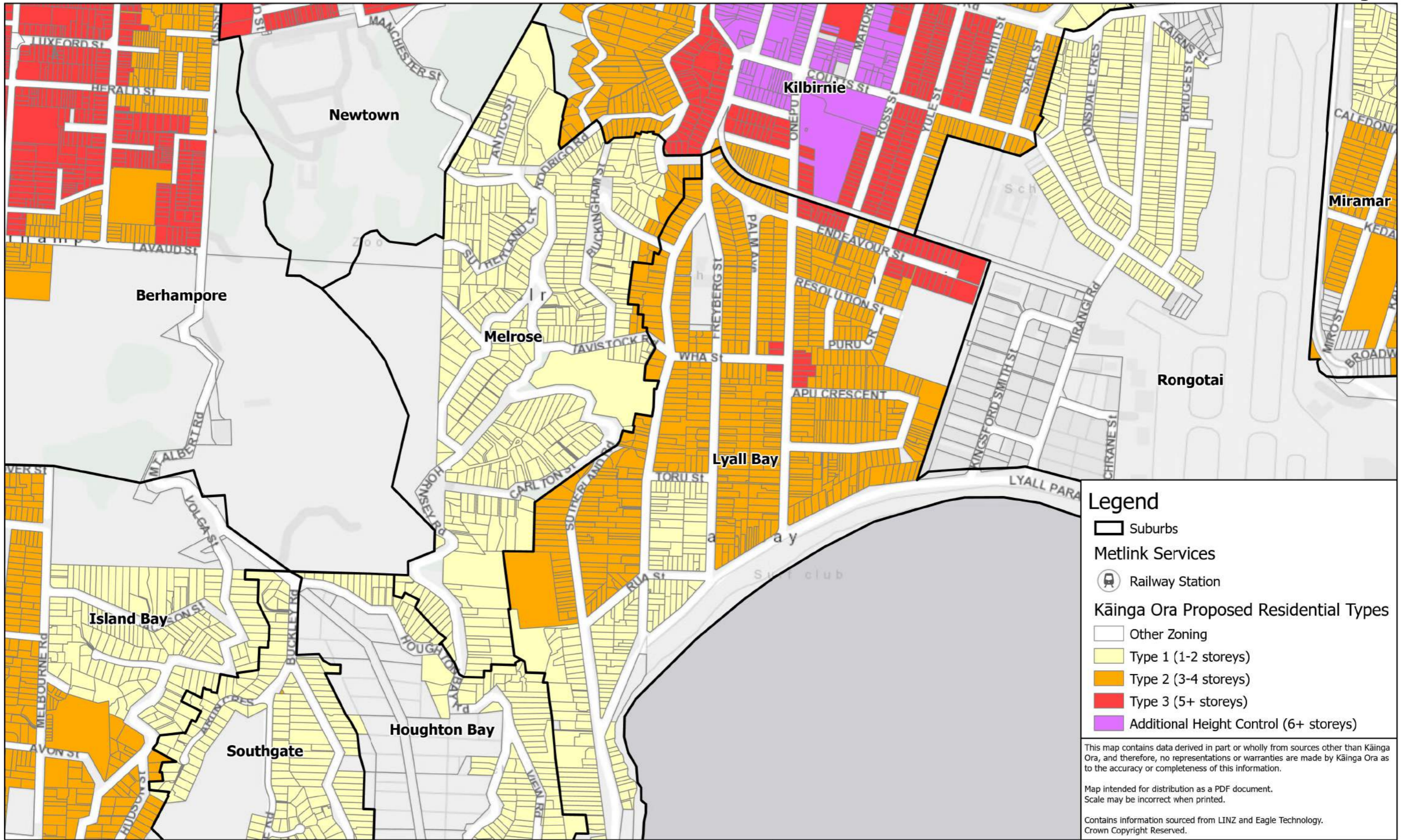
Scale @ A3: 1:7,500

Kilbirnie

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-10





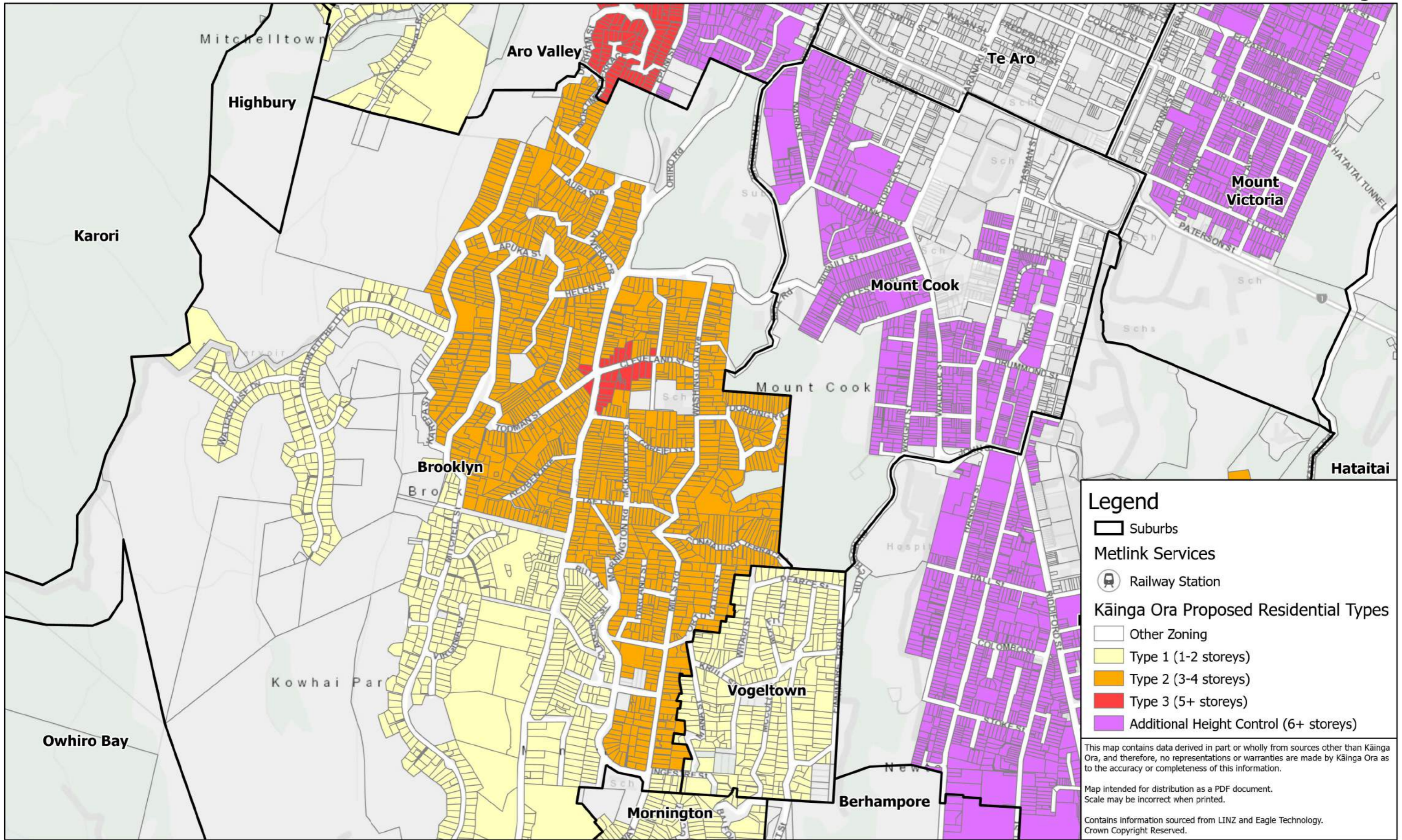
Scale @ A3: 1:7,500

Melrose & Lyall Bay

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-11





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.

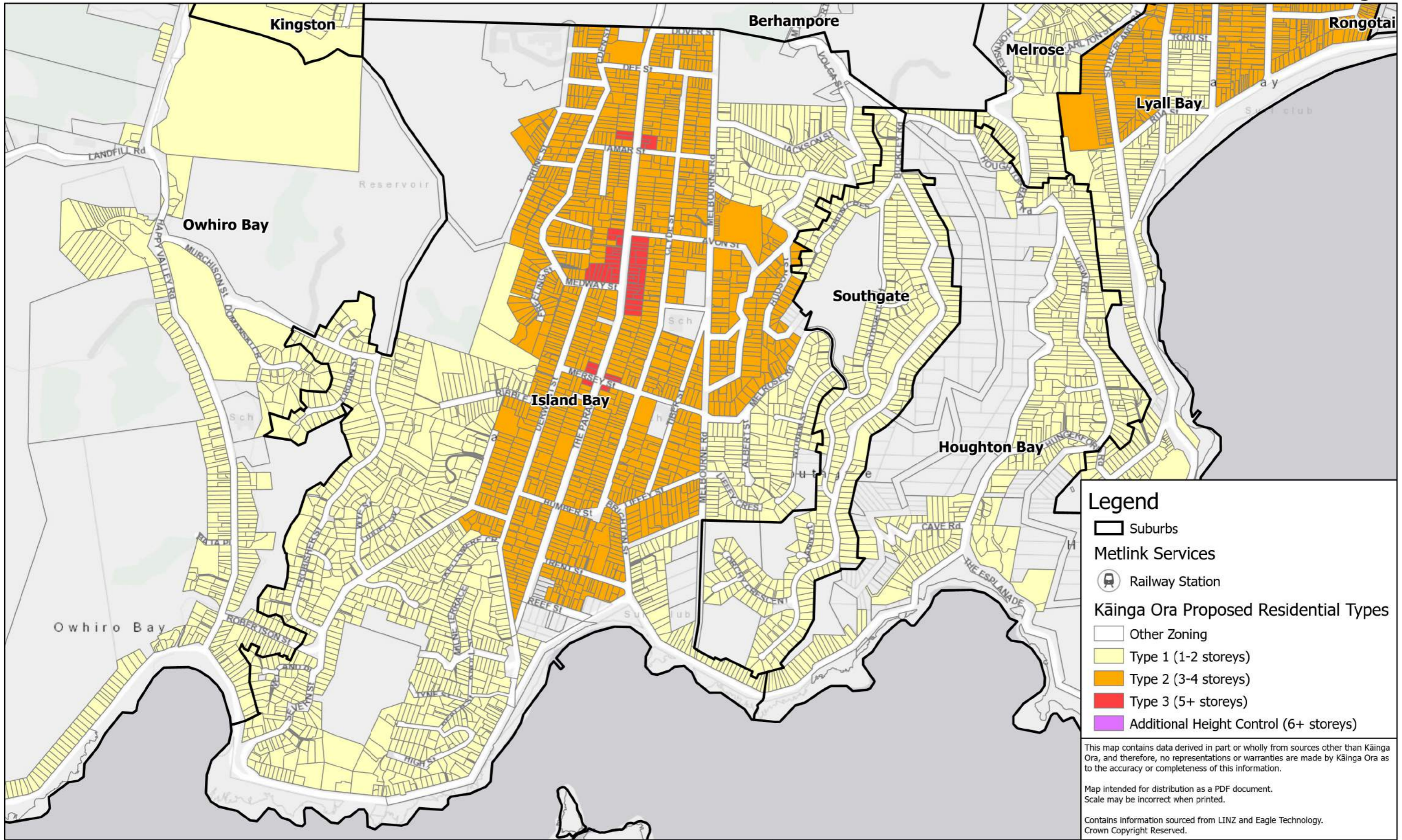


Scale @ A3: 1:10,000

Brooklyn
Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-



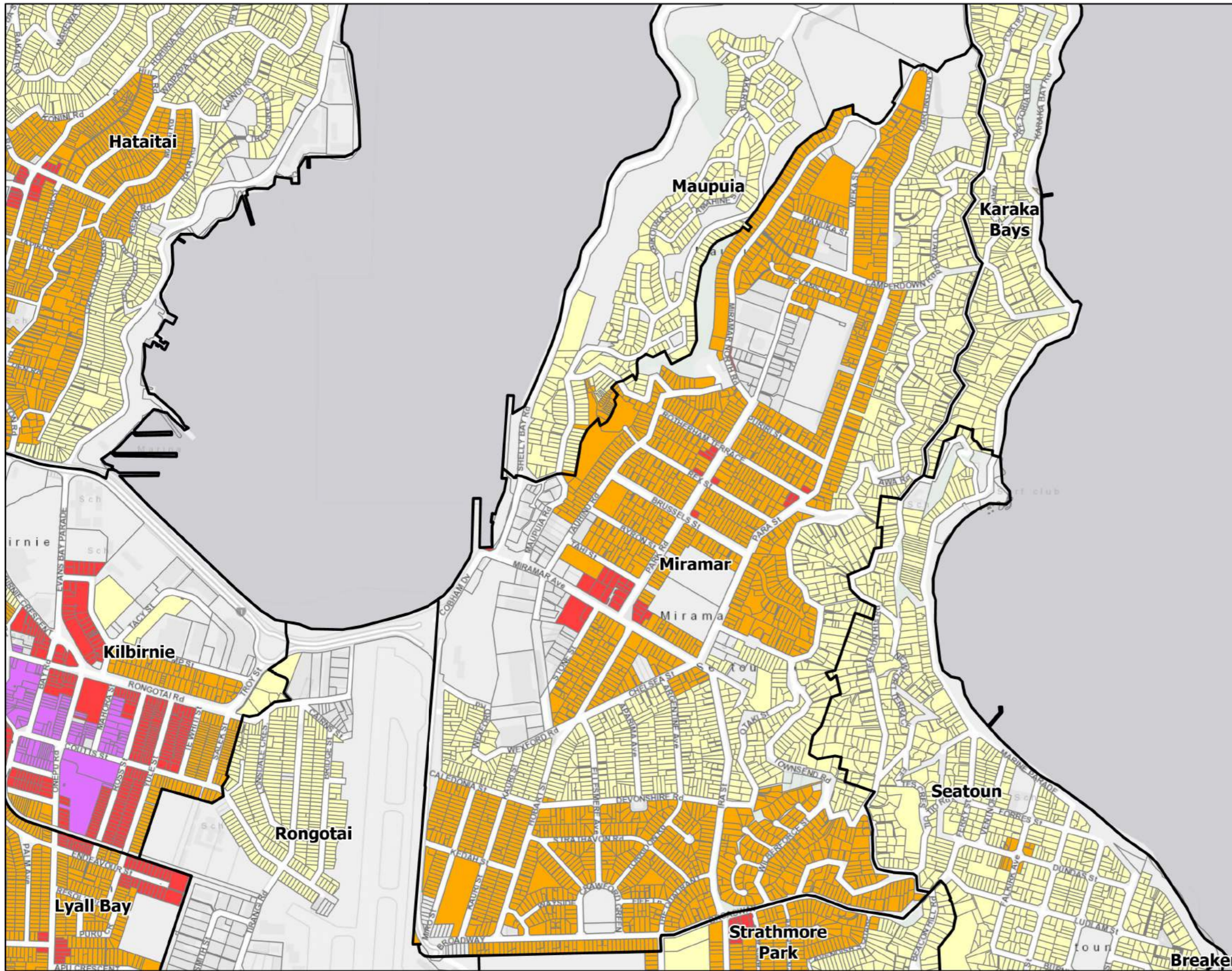


Scale @ A3: 1:10,000

Island Bay
Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-





Legend

- Suburbs
- Metlink Services**
- Railway Station
- Kāinga Ora Proposed Residential Types**
- Other Zoning
- Type 1 (1-2 storeys)
- Type 2 (3-4 storeys)
- Type 3 (5+ storeys)
- Additional Height Control (6+ storeys)

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information.

Map intended for distribution as a PDF document. Scale may be incorrect when printed.

Contains information sourced from LINZ and Eagle Technology. Crown Copyright Reserved.

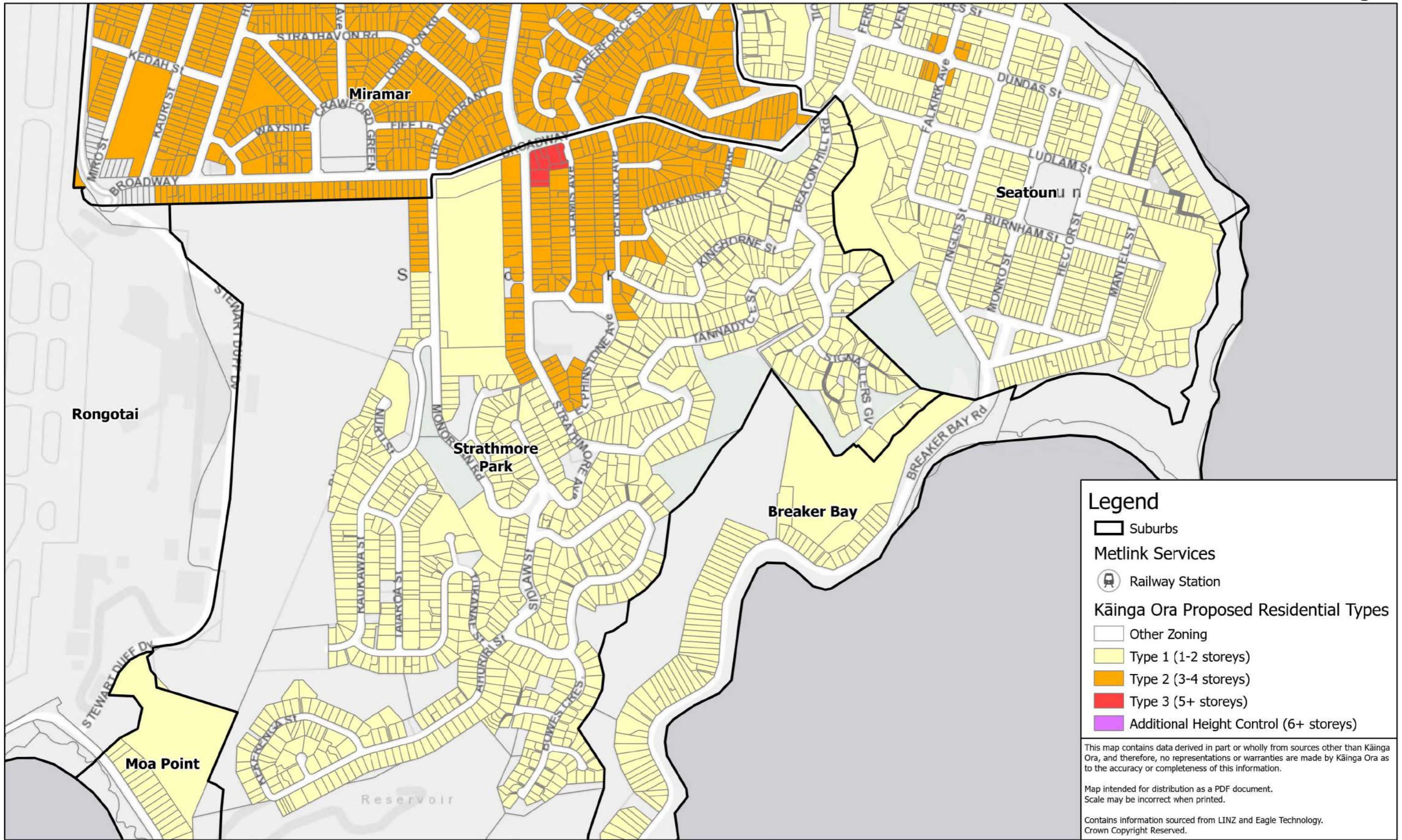


Scale @ A3: 1:12,500

Miramar
 Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-12





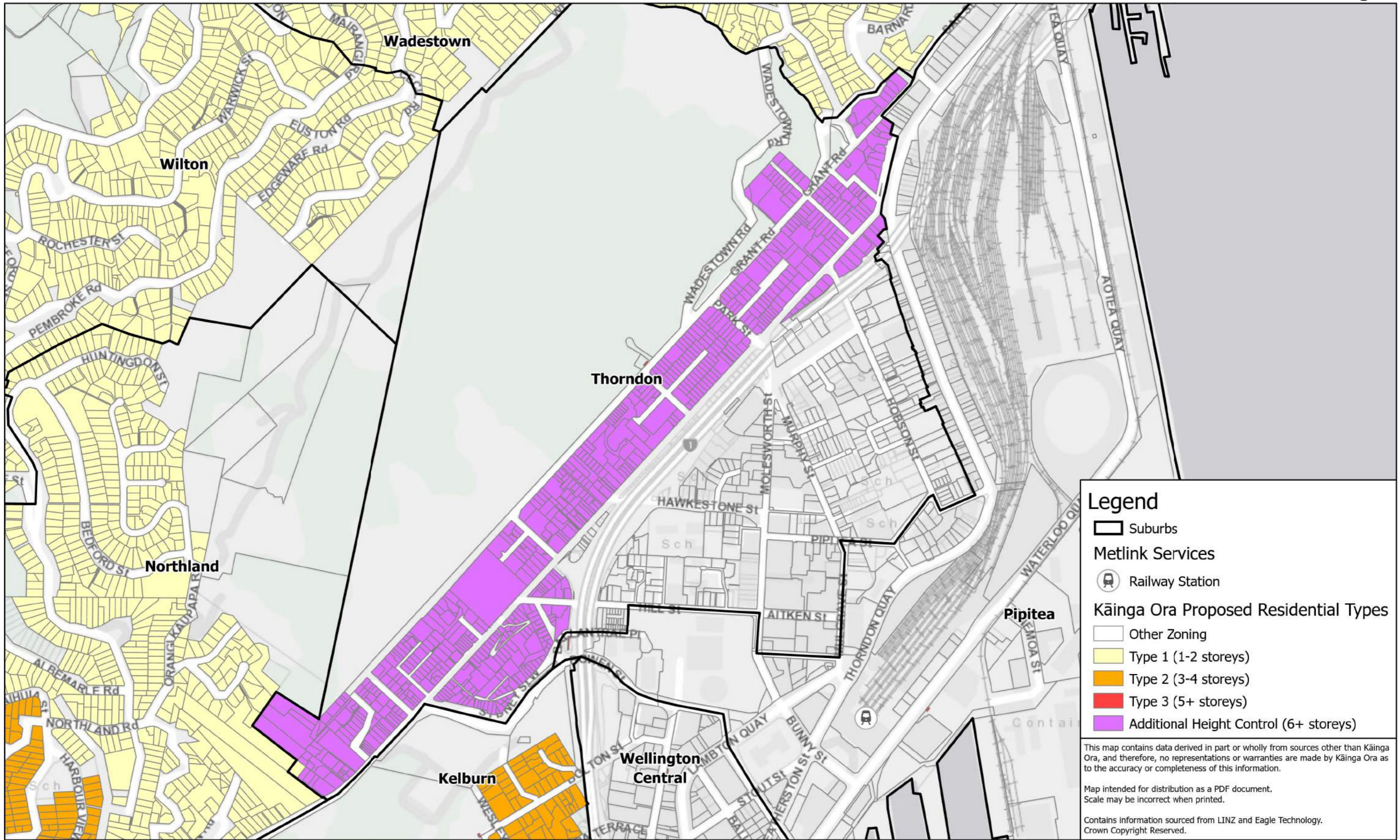
Scale @ A3: 1:7,500

Strathmore Park

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-13





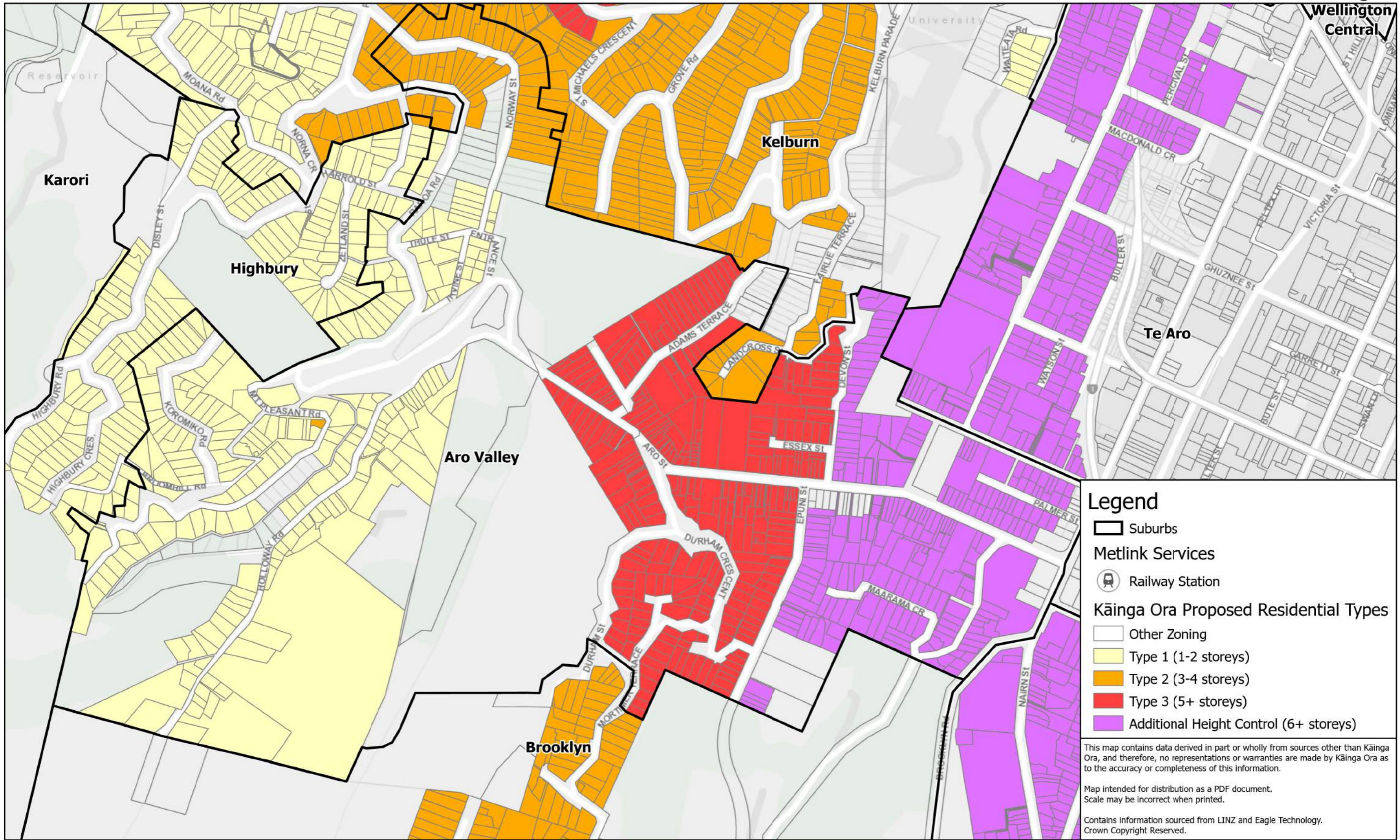
Scale @ A3: 1:7,500

Thorndon

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-14





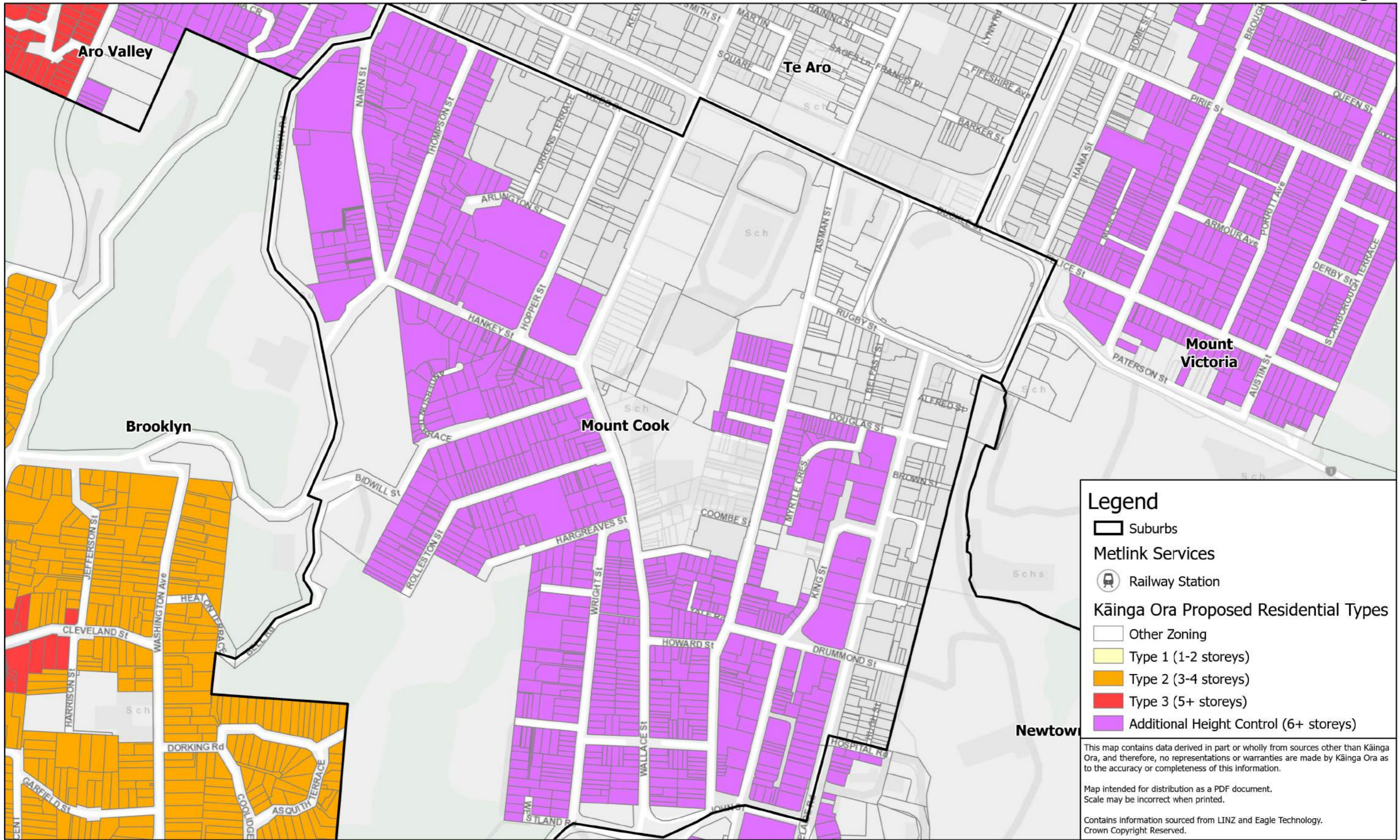
Scale @ A3: 1:5,000

Aro Valley

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-15





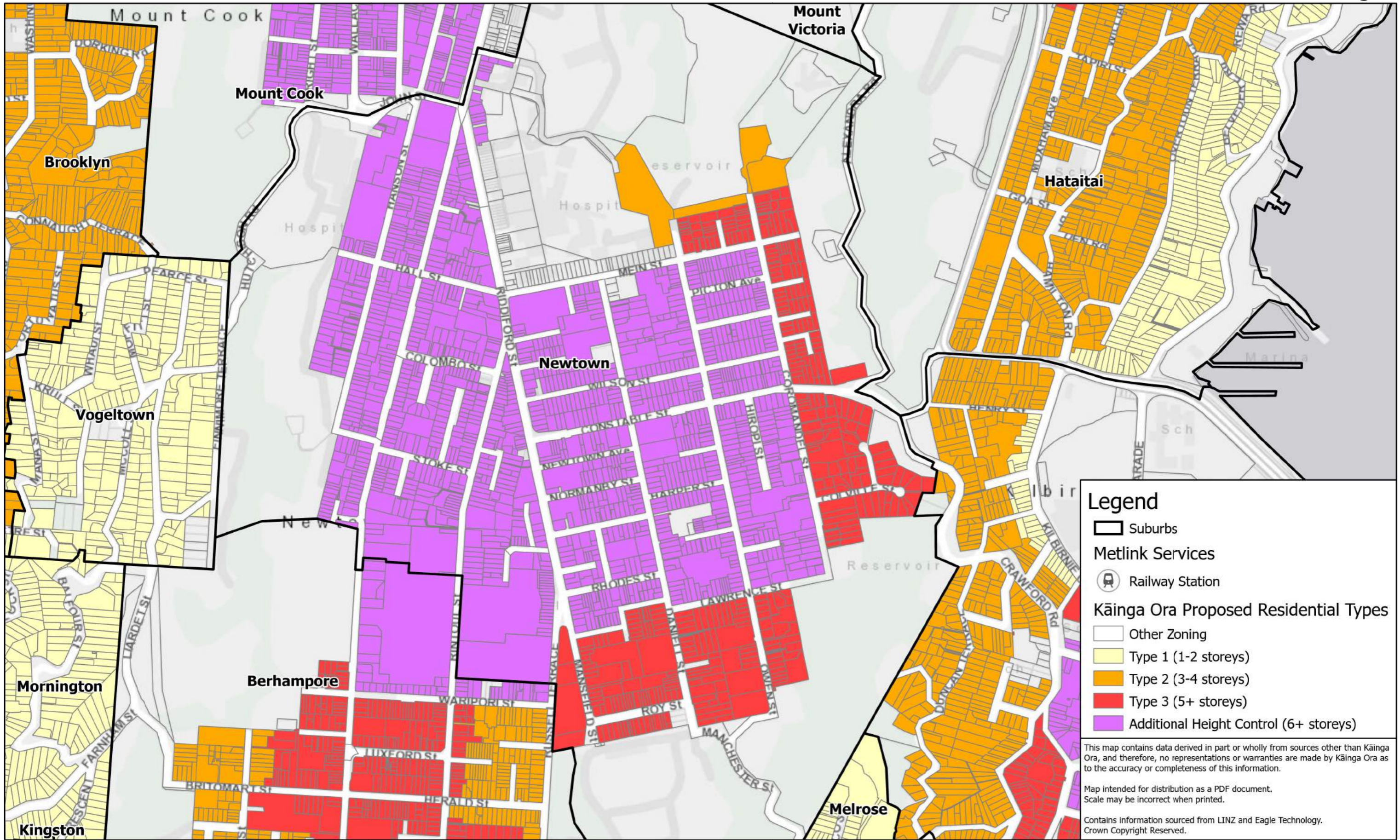
Scale @ A3: 1:5,000

Mount Cook

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-16





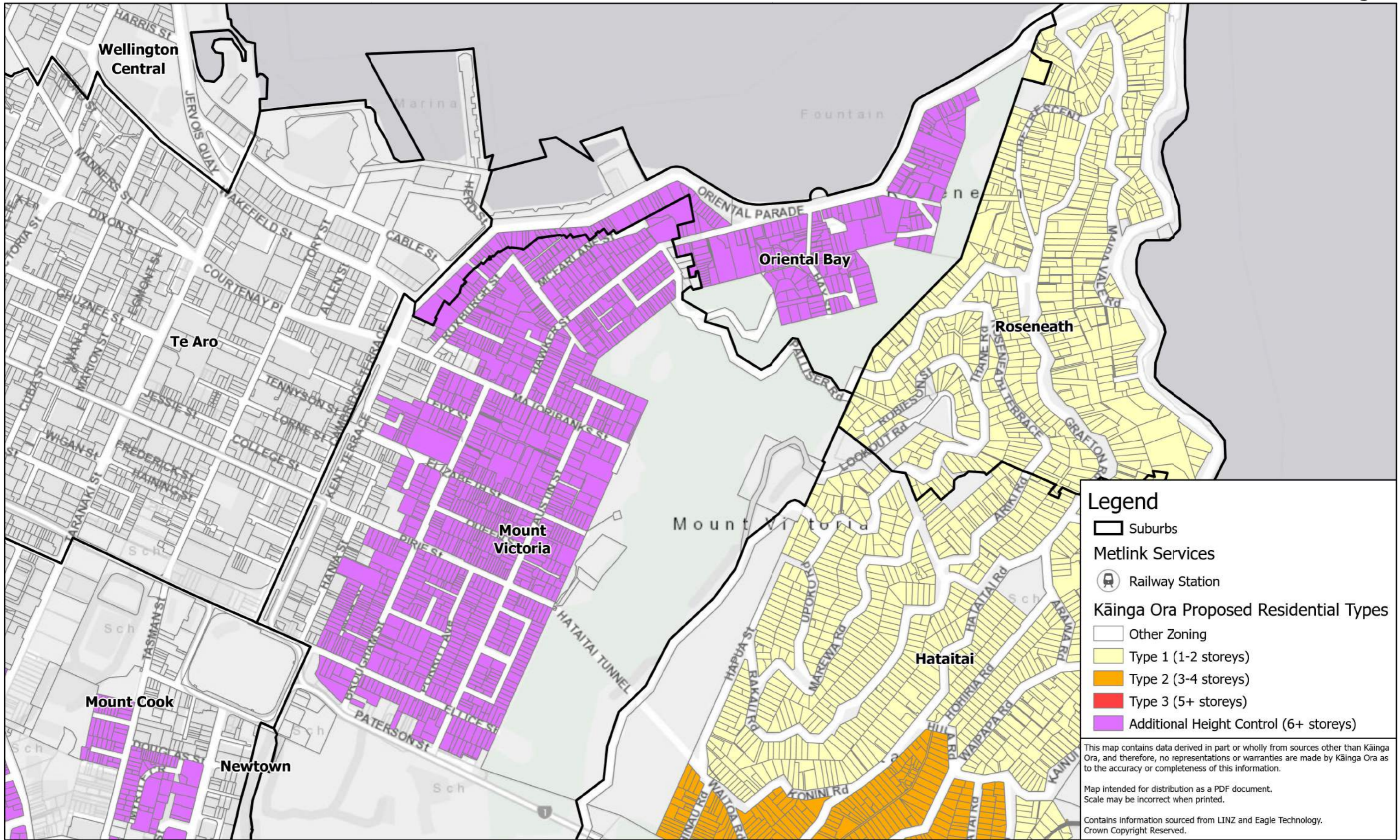
Scale @ A3: 1:7,500

Newtown

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-17





Scale @ A3: 1:7,500

Mount Victoria & Oriental Bay

Kāinga Ora Proposed Changes to WLG Draft Spatial Plan

710-UZ-18



Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16029

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Dirk Benjamin van den Eykel

Suburb: Aro Valley

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

I own a house in Aro Valley and I like the bohemian atmosphere most of all.

I don't want to preserve the special character of the suburb at the expense of people being able to live in warm and dry homes. So many beautiful character buildings are cold and drafty and mainly rented out, and I have strong ethical objections to the poorest having to bear the brunt of the cost of keeping that special character.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Commercial activity (retail, cafes, local businesses), Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Medical facilities/centres, Access to cyc

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Parks and playgrounds, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.), Child care, Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Nearby grocery shops and green spaces. During our one allocated walk a day we discovered so many new green spaces around Wellington.

What amenities or facilities were missing or could have been improved?

More rain covers - waiting outside in a line makes you aware just how many of Wellington's streets are not covered and exposed to the rain, especially on the arterial routes from the Inner Suburbs to the City Centre (i.e. Willis Street, Adelaide Road, Kent/Cambridge Terrace).

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

I like how boldly it wants to embrace compact living.

2. What would you change or improve?

I would want more intensive development along Adelaide Road, there's so much potential in that area.

3.

4.

5.

6. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**

More rain shelters on arterial roads to encourage people to walk from the Inner Suburbs even when the weather is acting up. I have to acknowledge it's one feature of malls that I like, being able to better regulate their environment and keep shoppers dry.

7.

8. **To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:**

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Agree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Agree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Agree

5. **Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?**

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. **Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?**

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in

this area).

Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

Mitigating the risk of rich landowners abusing the system by using their wealth and influence to buy representation.

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Stongly Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Not sure

11. If you answered yes to the question above, what types of assistance would help landowners?

Planting

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

I think it's great that Wellington is building upwards more, but I also think those apartments are best suited to renting out.

I think townhouses like you get in places like Amsterdam or Melbourne are a better model of compact housing for people who are buying.

Have you provided an attachment? No

From: Info at WCC
Sent: 28 September 2020 08:31
To: [REDACTED]
Cc: Info at WCC; BUS: Planning For Growth
Subject: Re: [#SR-34366] Fw: Draft Spacial Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue Category

Kia ora Michael,

Thank you for your email regarding the draft spatial plan submission.

We have forwarded your email to the Planning For Growth Team as they are best suited to reply.

Ngā mihi,

Kate

P [REDACTED] F [REDACTED] Customer Service Rep | Customer Contact Centre |
W Wellington.govt.nz
PO Box 2199 Wellington 6140

!-- Initial customer request --!

| | |
|-------------|--|
| Description | <p>Two things about my submission (see below): 1/ I wish to make an oral submission as well please. 2/ Please advise what level of consideration will be given to submissions noting that the Council is required by law to give "due consideration" to submissions re its Annual Plan. Thank you. Michael Gibson</p> <hr/> <p>From: Michael Gibson Sent: Friday, 25 September 2020 10:02 AM To: [REDACTED] Subject: Draft Spacial Plan</p> <p>I submit that no new building should be permitted if sunlight or a view is taken from an existing building. Michael Gibson [REDACTED] Karori Wellington 6012</p> |
|-------------|--|

On Mon, 28 Sep at 8:01 AM , Michael [REDACTED] wrote:
Two things about my submission (see below):
1/ I wish to make an oral submission as well please.
2/ Please advise what level of consideration will be given to submissions noting that the Council is required by law to give "due consideration" to submissions re its Annual Plan.
Thank you.

Michael Gibson

From: Michael Gibson
Sent: Friday, 25 September 2020 10:02 AM
To: [REDACTED]
Subject: Draft Spacial Plan

I submit that no new building should be permitted if sunlight or a view is taken from an existing building.

Michael Gibson

[REDACTED]
Karori
Wellington 6012

[REDACTED]

From: Macfarlane <[REDACTED]>
Sent: 30 September 2020 15:00
To: BUS: Planning For Growth
Subject: Submission on Mt Victoria
Attachments: Submission on Wellington City Council Draft Spatial Plan.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue Category

My submission is attached.
Regards
Ross Macfarlane

Submission on Wellington City Council Draft Spatial Plan

This submission is made on my own behalf and I would wish to speak to my submission should this be possible.

Ross Macfarlane

[REDACTED]

Mt Victoria
Wellington 6011

T: [REDACTED]

The proposed Spatial Plan for Mt Victoria appears to have been done without full reference to the history of the suburb, its demography and its topography.

I share the concerns of other groups that the amount of housing required is probably inflated. The Spatial Plan appears to have been designed to meet the highest possible growth in population, which is not feasible. Almost all the additional housing required could be built under existing rules. What has been proposed is a 30-year Plan but it requires development in heritage areas from Day One, which may never be needed. We live in a changing world and the impact of the Covid 19 pandemic is a long way from being fully realised. There are likely to be significant changes to the number of businesses, the way businesses operate and how people work.

It is clear from the Council's most recent document – **Citywide estimated growth figures** - issued on 25 September 2020, that the Council believes it now only needs to find room for 2720-4731 people and 1083-1895 dwellings. At the high end, this is 6 new dwellings per annum in Mt Victoria. Right at this moment, there are 8 new dwellings under construction in character sub-areas of Mt Victoria replacing two that have been demolished i.e. 6 additional dwellings *under the current rules*. There is therefore no need for dwellings in Mt Victoria to be higher than 3 storeys.

I am not against more housing or more affordable housing in Wellington, but such development should be phased, so that it first takes place in areas which need regeneration e.g. Adelaide Road and from Kent Terrace through to Willis Street. In these areas the effect of multi-storey apartments can be blended with other similar buildings.

I am particularly concerned about the blanket treatment of Ellice Street as suitable for Type 3 (3-4 Storey apartment buildings) and Type 4b (buildings up to 6 Storeys and mixed use and apartment buildings).

Under the NPS-UD there is provision for an exception to the building heights if consideration is given to 'qualifying matters', including **special characteristics** where there is sufficient evidence to show that providing for development to the required density would be inappropriate.

The historic housing stock of Mt Victoria and its unique suburban form are used to promote Wellington, not least by Wellington City Council. The suburb is visited and appreciated by New Zealanders and international tourists. Ellice Street is a key walking route for tourists travelling from Pukeahu National War Memorial Park to the town belt at the top of Ellice Street to look at one of the sites used in filming the Lord of the Rings series.

Ellice Street is essentially a street of pre-1930 houses forming a coherent streetscape of character houses. Its overall character is still intact.

The strong, cohesive architectural character of Ellice Street was recognised by the Board of Enquiry in the decision on the proposed Basin Reserve Flyover. I also question the assumptions underlying the draft Spatial Plan - essentially, you don't need to destroy the city's heritage for the additional dwellings needed each year.

At the Board of Enquiry in to the Basin flyover in 2014 the Board noted that:

The NZ Urban Design Protocol itself identifies seven essential design qualities, of which we find **Context and Character** are expressly relevant to heritage matters. Quality urban design sees buildings, places and spaces not as isolated elements but as part of the whole town or city ... a building is connected to its street, the street to its neighbourhood, the neighbourhood to its city... Quality urban design understands the social, cultural and economic context as well as physical elements and relationships ... recognises the heritage values of a place.

and ... reflecting and enhancing the distinctive character, heritage and identity of our urban environment ... recognises that character is dynamic and evolving ... protects and manages our heritage, including buildings, places and landscapes.

I urge the Council to have a re-read of this report.

Ellice Street is already a medium density area with a lot of rental properties in high demand for the affordable space and proximity to the city that they provide. The number of electric rental scooters left in the street is clear evidence of a youthful occupancy in the area. Building 4--6 storey apartments in Mt Victoria is unlikely to provide affordable housing and will, in fact, expel the many young people currently occupying the large houses divided into multiple flats.

Ellice Street and Wellington East Girls School behind it is part of the suburb's wider cityscape when seen from across the city. More so than some of the areas in Mt Victoria which are deemed to be part of the character zones of Mt Victoria such as Armour Ave and Caroline Streets which are hidden away.

I am opposed to the removal by the Council of the pre-1930 demolition controls.

I urge the Council to retain the protection provided by Rule 5.3.11 in the District Plan which does afford pre-1930s residential buildings in Mt Victoria some degree of protection by virtue of requiring a consent application for demolition.

The Council should continue to recognise the special heritage characteristics of the broader area and the need for sensitive, denser development especially in the Character Areas. A continued emphasis should be placed on **streetscape character and building design** in those areas outside designated sub-areas. Retention of a general character overlay over these areas would ensure that new development respects the local streetscape.

As far as the history of Wellington is concerned, there are a number of houses in Ellice Street and Austin Terrace which are physical links to the social history of the city. It is a pity that the City does not have a system of plaques to acknowledge the role played by people and their houses in the development of the City.

Two properties (53 and 68) are among the 39 houses of particular interest featured in the Wellington City Council's [Mt Victoria Heritage Study Report](#). Refer to [Appendix 5](#).

Our own house at [REDACTED] was considered by Charles Fearnley as worthy of inclusion in his book *Vintage Wellington*.

57 Ellice Street was house where the Brougham House School was established. This school was the forerunner of today's Chilton St James School in Lower Hutt.

Finally, there is another important factor that appears to have been overlooked in the treatment of Ellice Street.

That is the **proposed second Mt Victoria tunnel**. The tunnel will have a protection zone around it which affects houses in Paterson Street, Austin Terrace and Ellice Street. I am sure that NZTA would not wish developers to start building multi-storey buildings in this protection area. Nor, I would hope, would the City Planners wish to compromise the ability of the City to improve transport links to the Eastern Suburbs. The second tunnel would be a key transport link for new modes of public transport, such as trackless trams.

R C Macfarlane

[REDACTED]

From: Julie Ward [REDACTED]
Sent: 03 October 2020 11:30
To: BUS: Planning For Growth
Subject: Submission on the Draft Spatial Plan
Attachments: Draft Spatial Plan Submission 2020 09 29.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning,

I am writing to respond to the Council's recent request for responses to the Draft Spatial Plan (DSP).

Mandatory Information

My name is Julie Ward.

My email address is [REDACTED]

My phone number is [REDACTED]

My postal address is [REDACTED] Khandallah, Wellington 6035
[REDACTED]

My preferred method of contact is email.

I already receive the WCC email newsletters regarding Planning for Growth.

I am making this submission as an individual.

My submission is attached as a Word document.

Please acknowledge safe receipt.

Regards,
Julie Ward

I am writing to respond to the Council’s recent request for responses to the Draft Spatial Plan (DSP).

Mandatory Information

My name is Julie Ward.

My email address is [REDACTED]

My phone number is [REDACTED]

My postal address is [REDACTED] Khandallah, Wellington 6035
[REDACTED]

My preferred method of contact is email.

I already receive the WCC email newsletters regarding Planning for Growth.

I am making this submission as an individual.

Executive Summary

- Process
 - Website forces responses
 - Covid
 - Timing is inappropriate
 - Engagement Schedule very limited
 - No notification to ratepayers
 - Non-statutory consultations are poor process
 - Plan differs significantly from the 2019 consultation
 - No explanation of “Density Done Well”
- A Note on Affordability
- NPS-UD 2020
- Regional Approach
- Specific responses to DSP as Presented
 - My response to the Compulsory Questions
 - Comments on DSP:
 - Khandallah does not have access to a high frequency transport route so NPS-UD 2020 does not apply
 - Population increase estimates are too high
 - Three waters capacity in Khandallah is not sufficient to service the level on densification proposed
 - No information on capacity of the electricity network
 - WCC must retain power to regulate parking
 - Existing section sizes and configurations severely limit design possibilities for medium density housing or apartments and will result in suboptimal outcomes
 - Demographics of many suburbs including Khandallah through to 2047 will be increasingly elderly and DPS must plan for this situation
 - Encouraging demolition of existing quality housing stock is wasteful and environmentally irresponsible
 - The character of the Khandallah is its connection to the natural environment and the surrounding hills

- Universities should be encouraged to provide more student accommodation

I believe any action to develop a Spatial Plan for Wellington should be postponed until after the effects of Covid Pandemic become clearer.

At present there are too many unknowns:

- Will there be a vaccine?
- How will migration patterns change if and when our borders reopen?
- Will work from home become a permanent fixture?
- Will there be an ongoing deep recession?

GENERAL COMMENT ON PROCESS

The Council's website says "Between 8 April and 17 May 2019 we asked people to have their say on the pros and cons of four growth scenarios.

The numbers are in, you had your say, and now we know what you want for your city tomorrow."

It is truer to say a very small number of people had their say in a survey which was framed in a way that subtly directed responses to the responses the Council appears to have wanted.

The website goes on to say: "Between 10 August and 5 October you can have your say on the future shape of our city.

Go to the Planning for Growth website to see the DSP and make your submission."

Website form forces responses: The electronic submission form reads like an NCEA exam paper "Section 2 – Compulsory Questions". Why are they compulsory? The questions ask for yes/no answers to questions that are far too complex to answer in that way. I have spoken to many people who have given up on the process before they have even got to the "non-compulsory questions".

Timing: The timing of this consultation has been most unfortunate. Covid has made predicting the future even more uncertain. Previous patterns of employment, family formation, migration, overseas student arrivals, and location of workplaces (home or office) among others are in a state of flux. The assumptions as to population growth and land utilisation on which the Spatial Plan is predicated will always be guesses but are now even more likely to turn out to be inaccurate because individuals may make quite different life decisions and future governments may change national policy settings particularly in relation to international student intakes and immigration post-Covid.

Currently Wellingtonians are worried about keeping their jobs and keeping their businesses afloat. The last thing they need is to be forced think about where people will live in 30 years' time. I am sure there are many who are far too stressed about paying the rent or the mortgage and worried about where they will work or live next year to consider the implications of the DSP.

Public and media attention during the consultation period are being taken up with the Covid pandemic and the general election so there has not been sufficient time or space for comprehensive public debate.

Level 2 restrictions have made it very difficult for residents and ratepayers to meet together, or with councillors and council officers, to discuss the proposals.

The Engagement Schedule was extremely limited: The Engagement Schedule did not seem to ever contemplate councillors or planning officers fronting up to residents in some of the Outer Suburbs. In the case of Khandallah there was no offer of any engagement at all. Fortunately, the Onslow Residents Community Association was able to arrange for the Mayor, three of our ward councillors and Councillor Iona Pannett to attend a meeting on 24 September. Planning officers declined the invitation to attend which I consider to have been a sign of contempt for the residents and ratepayers who pay their salaries. I am left with the impression that the Councillors have no control over Council employees.

No notification to ratepayers: On 4 August 2020 I received my quarterly rates invoice by email and I expect many other Wellingtonians received theirs at about the same time by post. There was no mention with the rates notice that only six days later the Council would be commencing consultation on a plan which contemplates the most dramatic changes to the nature of our city I have seen in my thirty years as a resident. The DSP affects almost every part of the city in some way. If adopted it will completely change the look and feel of our city. It is all very well to say material was on the website but most of us do not prioritise scanning the Council website every day.

Non-statutory consultations are not good practice: I have had to spend a huge amount of time reading the material attached to the Spatial Plan consultation and researching material from numerous previous non-statutory consultations in order to give a considered response to the DSP. I had to do this for the 8 April to 17 May 2019 consultation and for earlier consultations on Medium Density Housing in Khandallah. Next year it seems I will have to do it all again for a non-statutory District Plan. The process is wearing me down. I would rather be out walking in the hills or in my garden than sitting in front of a computer to respond yet again to a “non-statutory consultation” but I am stuck between a rock and a hard place because if I don’t respond the Council will come out the next time and make an updated statement along the lines of : “Between 8 April and 17 May 2019 we asked people to have their say on the pros and cons of four growth scenarios. The numbers are in, you had your say, and now we know what you want for your city tomorrow.”

Covid: At present the effects of Covid Pandemic are unclear. We are in limbo.

There are too many unknowns:

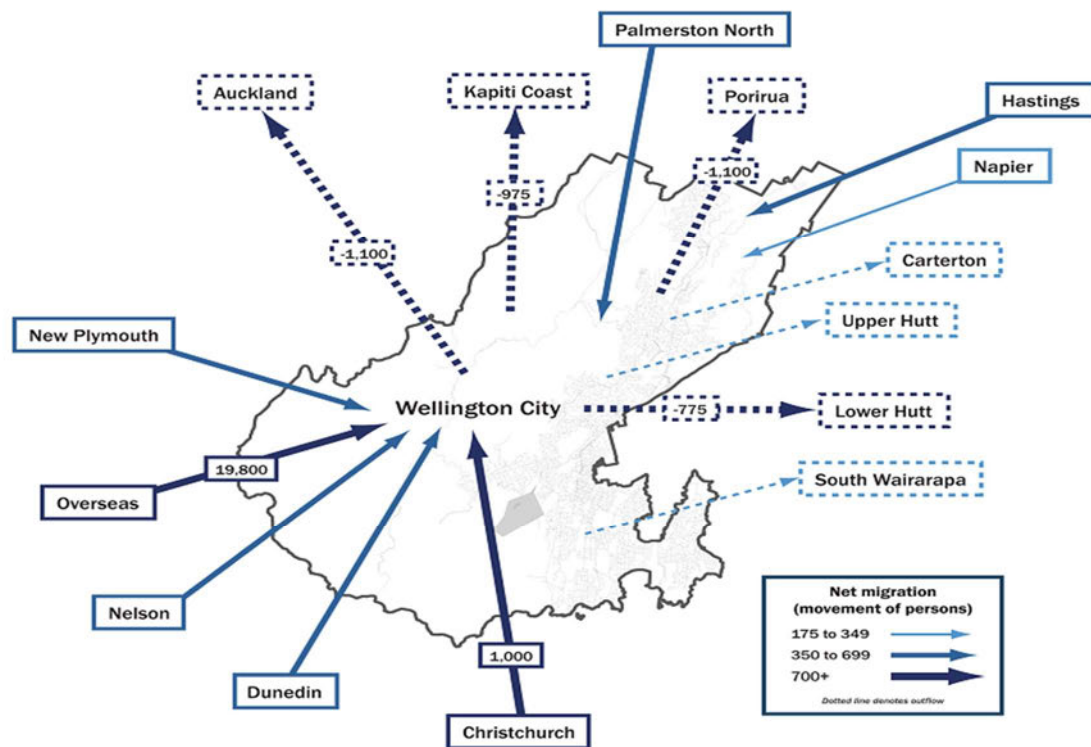
- Will there be a vaccine?
- How will migration patterns change if and when our borders reopen?
- Will work from home become a permanent fixture?
- Will there be an ongoing deep recession?

The diagram below created by idnz

(<https://forecast.idnz.co.nz/wellington/drivers-of-population-change>)

shows historical migration flows into Wellington City from 2008 to 2013. If we had not had the 19,800 people from overseas there would have been no almost no population growth at all. It is conceivable that migration will stay stalled for some years as a result of Covid and even if it resumes the rate may be lower than in the past.

Historical migration flows, Wellington City, 2008-2013



Population and household forecasts, 2013 to 2043, prepared by .id the population experts, November 2019.

.id
the population experts

Any action to develop a Spatial Plan should be postponed until the effects of the Covid Pandemic on life and the economy in Wellington, nationwide and in the whole world become clearer.

The Outer Suburb Densification in the DSP is not what was presented in the 8 April to 17 May 2019 survey: Proposal 2 (suburban densification) of the 8 April - 17 May 2019 survey asked us to comment on medium density of 2 to 3 storeys near

Khandallah Village. The comment on this proposal attached to the most recent publicity material says, "I think there's a real opportunity here to build some very modern well -designed town houses/medium density options that could blend well with character buildings that remain and this would create a leading city blending the old with the new". I agree with that comment but the goalposts have moved, as the Spatial Plan now proposes 6 plus storeys by the train line, and up to four storeys for Central Khandallah.

On 16 March 2016 the Council's Transport and Urban Development Committee resolved:

"Agree that officers continue with additional targeted engagement with the Khandallah, Island Bay, and Karori communities on options for medium-density housing and town centre planning, that timelines are set, and that any engagement with communities and stakeholders is ongoing, early and clear."

I am not aware of an additional engagement and now we have a high-density proposal instead.

No explanation of what is meant by Density Done Well: We are being asked to endorse a plan with no detail from the Council of how it will encourage developments that are sensitive to character, sustainability and affordability. There is no indication of what "density done well means". There is no comfort for existing residents that proposals will be fully notified so residents can raise concerns. All we really have is a list of height zones framed by a lot of aspirational words. We are being asked to trust the Council. In the past Khandallah residents "trusted" the Council to enforce the existing District Plan. The Council lost a huge amount of trust when it gave a non-notified consent for the three storey five town house development in Agra Crescent which breached both height and land coverage standards set out in the District Plan. The Council seems to have already decided that exceedance criteria will usually allow new developments of up to 12 metres high (effectively 3 storeys) in the outer suburbs. It appears as if new builds over two storeys are generally approved by officers with delegated authority on the grounds of minor impact. Given that this is the Council's interpretation of the current District Plan there seems no need to allow any further leeway.

In light of the Council's historic failures to get things right - leaky buildings, blocking the development of Johnsonville and now doing a complete U-turn, the Shelly Bay shambles, the approval of buildings of the waterfront which were advised against and which have now had to be demolished - how can residents and ratepayers have any faith that the Council's proposals are in the best interests of Wellingtonians? How can we reasonably expect the Council to follow through on the lofty goals set out in background material provided with the Spatial Plan aimed at softening the harsh reality that Council want to turn our small "biophilic" (the Council's term) city into a hodge-podge with tall and out of character

buildings popping up randomly and unpredictability throughout the CBD and in the inner and outer suburbs?

Action I would like WCC to take:

At the very least extend the consultation period on the DSP and work harder to ensure residents and ratepayers are adequately informed of the proposals but preferably take on board my comments below and start again with a regional spatial plan freed from the shackles of NPS-UD 2020.

A NOTE ON AFFORDABILITY

The introduction to the DSP records that concerns have been expressed about current housing affordability and supply issues. There is no doubt that Wellington does face housing affordability and supply issues. The DSP in conjunction with NPS-UD 2020 takes the view that “up-zoning’ will contribute to a solution.

Enabling has not encouraged the regeneration of Adelaide Road nor Kent and Cambridge Terraces. There are great ambitions for Johnsonville but unless there is some kind of cooperation with, or compulsion of, the owners of the flat land in the town centre (which are mostly carparks) it is hard to see that there will be any more progress there than there has been over the past thirty years.

I agree the DSP may be a component in addressing affordability but there are other factors in play including very low interest rates, quantitative easing by the Reserve Bank, New Zealand having had pre-Covid the highest intake of immigrants per head of population of any almost any country in the world, the tax advantaged position of residential housing relative to other investment options, the lack of a viable funding model for three waters infrastructure, and the lack of a mechanism for councils to ‘capture value’ from increased land prices when re-zoning decisions deliver an un-earned capital gains. In this environment the DSP isn’t a silver bullet.

I am starting to feel that successive governments have let things get so out of control that only a massive public building programme will fix the problem.

My concern is the DSP may result in unintended consequences for Wellington but not solve the problem of housing affordability. I have read a lot of comments from young people living in the CBD on social media while I have been researching for this submission. Many seem to think if only heritage protections were removed then their crumbly old flat would be miraculously transformed into a lots more base-isolated, spacious, warm, dry apartments. Density Well Done shouldn’t ruin neighbourhoods but it may gentrify them to the detriment of students who have historically lived couple of years in a rundown pre-1930’s house. “Life changes and decisions seem to play a large role in the decision to move out of the central city for a certain segment of the population. This includes students and younger respondents who may have moved on from the life stage where it is more convenient for them to live in the central city.”

<https://wellington.govt.nz/-/media/services/environment-and-waste/urban-development/files/survey-of-central-city-dwellers-final-report.pdf> (2015).

The increase in supply in the CBD where most future population growth is predicted at present appears to be at the high end so while there might be overall increase in supply, the supply of “student flat type housing” and homes suitable young workers in the CBD may actually end up being reduced. There will be cheaper options available but they may end up being in the Outer Suburbs or our neighbouring cities which does not seem to be the expressed preference of our young population.

NPS-UD 2020

NPS-UD 2020 seems to be a “one size fits all” directive from central Government which extends way too far into matters that should be locally decided.

The Ministry for the Environment consultation on NPD-UD in 2019 took place during the period immediately prior to the Local Body elections. Councillors may well have been too concerned about getting re-elected to pay it much heed. There were around 250 submitters to the MFE consultation including 80 individuals around 30 of whom chose to be anonymous. This was supposed to be a nationwide consultation. Although beyond the control of WCC I wish to record my view that the consultation was cursory and feels decidedly undemocratic.

I appreciate Wellington City Council did try to put Wellington’s case. The MFE summary says “The councils are concerned that the drafting of the NPS in places does not currently recognise that each area in the country is different, and requires contextual and community-based application.”

(<https://www.mfe.govt.nz/sites/default/files/media/Towns%20and%20cities/FINAL-NPS-UD-Summary-of-submissions.pdf>)

That view was not taken on board.

Further the MFE report says: “Individuals largely supported the proposal, but where there was opposition, it was largely Christchurch-based and on the grounds of loss of sunlight or increased density.” Was this because Christchurch has had medium density housing since 2016 and so they have seen unsatisfactory outcomes? Stuff recently covered the current Christchurch situation

<https://www.stuff.co.nz/the-press/news/122695983/new-christchurch-apartments-criticised-for--poor-urban-design>

The use of executive power to force through such a major change without the oversight of Parliament and exposure to the Select Committee Process seems an abuse of power.

Action I would like WCC to take:

Push back on Government regarding NPS-UD 2020 in this matter so that Wellingtonians have more flexibility to create their own solution to their own housing needs.

This would give greater opportunity to reach consensus on a nuanced Spatial Plan that takes into account our topography and existing layout of our city. It would also allow a greater opportunity to balance the competing interests of owners in existing suburbs and our heritage against the significant number of Wellingtonians who are in need of more and better housing.

REQUEST FOR A REGIONAL APPROACH

In 2016 the Local Government Commission commissioned Boffa Miskell to prepare a Wellington Region Spatial Plan Report.

(<http://www.lgc.govt.nz/assets/Wellington-Spatial-Planning/Wellington-Region-Spatial-Plan-Report-May-2016.pdf>)

The report recommended a Spatial Plan for metropolitan Wellington but WCC has chosen to go it alone.

Quotes from the 2016 Report (Bolded mark-ups are mine):

“A spatial plan would provide an **overarching strategic plan that clearly lays out how and where metropolitan Wellington is expected to grow** over the medium-term, the location and form of future development (including within existing urban areas), the transportation networks, infrastructure and community facilities needed to facilitate such growth. Such a plan would be based on integrated regional modelling and forecasting, with input from a range of government agencies, stakeholders and the wider community.”

“Wellington is unique within New Zealand in having its metropolitan urban area administered by five territorial local authorities. Each of these councils currently undertakes district-scale planning that incorporates elements of spatial planning to varying degrees, including development frameworks, urban development plans, urban growth strategies and similar planning instruments. However, **uncertainty exists as to whether these plans represent component parts of an overall ‘spatial plan’, or are in effect ‘competitive strategies’** as they are usually prepared without reference to the planning undertaken by other councils in the region.”

Comment: The DSP appears to me to be the competitive strategy; Wellington City Council wants to pack more people into Wellington City rather than consider whether better quality of life for everyone could be achieved by gentle densification throughout the Greater Wellington region.

“The major roading projects underway or proposed in the region as part of the Wellington Northern Corridor improvements (for example, Transmission Gully) have **significant implications for growth**; ideally, these are matters that should be addressed at a regional level given the nature and scale of such projects. Similarly, **in terms of housing, no clear collective position on regional supply and affordability is apparent, as is any evidence of a deliberate, co-ordinated regional response to these matters.**”

Comment: As it was in 2016 so it is now.

Action I would like WCC to take:

Go back to the drawing board and cooperate with all the adjoining councils to establish a deliberate, co-ordinated regional response to housing and transport in the Wellington Region.

SPECIFIC RESPONSES TO THE SPATIAL PLAN AS PRESENTED

MY RESPONSE TO THE “COMPULSORY QUESTIONS”

1. I do not live in the central city so I do not want to express a view.
2. I do not live in the inner suburbs so I do not want to express a view.
3. I strongly disagree with what is proposed for Khandallah. I realise I risk being labelled a NIMBY. In my defence I am addressing matters with which I am familiar and I respect the rights of others to speak to their area’s needs and circumstances. I have commented on Johnsonville because it has been a hub that I have relied on in the past but services there have greatly reduced over time.
4. (a) I would have liked to see more widespread but less intense densification of 2 to 3 storeys throughout the Outer Suburbs. At present some parts of Khandallah are zoned for significant densification while others appear to be left with the current infill rules of a single storey building on any lot smaller than 800m². The proposals for densification, because they are linked to the railway line, primarily affect the north facing slopes where it is more difficult to deal with sunlight and shading issues than might be the case on south facing slopes. This house recently built in Madras Street illustrates my point. It hugs faces south and hugs the bank. It does not affect the views or sun of any adjoining properties. Eventually greenery will re-establish around it. I would like to see densification in Khandallah happen first on sites like this irrespective of their location within the suburb.



(b) I see no reason why Wellington cannot expand out as well as up, especially into Ohariu Valley. Looking from the top of the top of Mt Kaukau it is difficult to see what logical delineation there is between the existing development at Churton Park and the wider Ohariu Valley. The land is already subdivided into lifestyle blocks, which I consider to be the most inefficient land use possible, so developing it more densely would not be taking away valuable farmland. This area can potentially accommodate 28,000 people which would meet half of the optimistic high estimate population gain (or almost all of the lower estimate) in one development. The reality is that people from outside Wellington City are commuting by car from the Wairarapa and Levin to Wellington. If we take a wider view of “green’

aspirations then Ohariu Valley which is close to Wellington City is a viable option.

5. I strongly disagree with the approach taken to protecting Special Character. See comments on NPS-UD 2020 above.
6. The character of Wellington is quite tightly packed wooden houses nestled in the hills. Random high rises sprinkled throughout the city and suburbs is not my vision of the future Wellington.
7. Why do I have to choose? The essential thing is infrastructure which in addition to the items listed includes roads, footpaths, electricity, gas and internet but all the items listed will contribute to a vibrant suburban centre.
8. What “mass transit stops are you talking about? It seems to me most the stops on the Johnsonville “mass rapid transit line” would not be able to accommodate or sustain any of the items mentioned.
9. To agree with the “blueprint” is to agree with the goals. The goals seem merely aspirational rather than concrete.

Compact? Wellington City is a component of a region should be viewed as such. Many people who work in Wellington live within the boundaries of other local authorities so if compact means living near to work it does not consider all the people who commute by choice from Kapiti, the Hutt Valley, Porirua and the Wairarapa. Even Horowhenua is now viewing Transmission Gully as opening up an hour’s commute to Wellington.

Resilient? Many tall buildings did not hold up well in the Kaikoura earthquake, base isolation is expensive and will not be an economic option in all but the highest specified and therefore most expensive high rises. We have low and medium rise (up to 3 storey) buildings that seem to perform well in earthquakes but these are to be discouraged going forward.

Inclusive? The inflexible nature of the DSP is pitting young against old, owners against renters, heritage against high rise. The Spatial Plan makes no mention of accessibility issues. In my view it is divisive and unhelpful.

Connected? At present I feel connected to my community in Khandallah and to the hills around me. The DSP seeks to sever these connections by blocking out the views and reducing amenity with our trees giving way to random high rises.

A survey this year, conducted by Inner City Wellington (ICW), shows that only 30.8 per cent of people in inner city Wellington feel a sense of community. Only 23 per cent of inner-city Wellington dwellers have asked if their neighbours are doing okay, 60 per cent have never shared a drink with them, and only 15 per cent have shared a meal.

(<http://wellington.scoop.co.nz/?p=130979#more-130979>)

In my street of 34 households I know every person by name, I have shared a drink and a barbeque with most of them on many occasions, I shopped for the elderly couple across the road during the Level 4 lockdown, children from the street play hide and seek in my garden. This is connectedness, this is what people have in the outer suburbs. When I see reports that “apartment dwellers in the inner city have never asked if their neighbours are okay” I feel that a mass of apartment style living has potential to disrupt the community we have worked to build and could make my community more disconnected. Vibrant and Prosperous? This is an aspiration. One person’s vibrancy is nightlife and restaurants while another’s is green space and connection with the natural environment. Flexibility is needed to support both. The DSP is not flexible so does not support this aspiration.

Greener: In the proposed denser ways of living on the outer suburbs many people will not be able to have productive gardens, will have reduced opportunity to install rooftop solar power, collect rainwater even for emergency water or hang their washing outside.

The main thrust of the DSP seems to be focussed on reducing the use of private motorised transport particularly peak time commutes to the CBD. It assumes the majority of residents in Khandallah commute to the CBD every day to go to work. Even before Covid this was not the case. In my street of 34 households I estimate almost half are either retired, work from home, walk to work in Khandallah Village or work somewhere other than the CBD. On current estimates by 2028 from a population of 10,810 in the Kaiwharawhara-Khandallah-Broadmeadows catchment 3197 or almost 30% will be over 65 most of whom will most likely not to be regular commuters so the proximity to commuter transport should not be the major consideration. (<https://forecast.idnz.co.nz/wellington/population-age-structure-map?CustomAgeFrom=65&CustomAgeTo=85>)

The future envisaged by the DSP for Khandallah seems to me not greener but greyer. There are other initiatives which can make our city greener other than reducing vehicle use. Examples are retrofitting existing buildings as opposed to relying on carbon emitting new construction, productive gardens, rooftop solar power, rainwater collection, composting and drying washing outside. In Khandallah we do a lot of these things already and I would like to see the Khandallah of the future welcoming more residents but offering a plan that enables everyone to keep up with these micro-green activities. The DSP will reduce these kinds of actions and lead to the loss of many mature trees, unless wind tunnels without views of the distant green hills, so not greener but greyer.

Comments on DSP:**KHANDALLAH DOES NOT HAVE ACCESS TO A HIGH FREQUENCY TRANSPORT ROUTE**

The Johnsonville branch line exists as an accident of history. It was built in 1880 and became part of the Main Trunk Line in 1908. In 1938 the Main Trunk Line was rerouted through a tunnel to Tawa and the existing track was terminated at Johnsonville. The 10km line is a single track through very steep terrain rising from the waterfront to 150 m above sea level. There are seven narrow tunnels, six bridges, and only three passing loops. As I understand it the layout of the track means there can only be a train in each direction every 15 minutes and the current trains are the longest the track can accommodate. The current timetable is as good as it can ever be. At peak times the trains are near capacity. The 10km trip takes 28 minutes from Wellington Station to Johnsonville with the new Matangi trains, it took 26 minutes with the old English trains and only 19 minutes with a 1938 steam train so it becomes less “rapid transit” by the year. I understand the time timetable has had to be adjusted to ensure reliability. The service still relies on a conductor coming through the train to clip your ticket. There is no facility for transfers to other public transport nor integrated ticketing.

In assessing Khandallah for Medium Density Housing the Beca and Studio Pacific Architecture Document “Wellington Outer Suburbs Assessment and Evaluation” (WOSA&E) provided in the supporting documents for this consultation https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0026/13598/Assessment-and-Evaluation-of-Wellingtons-Outer-Suburbs-Report-Introduction.pdf (at p.6 Analysis of Density Enablers) rated Khandallah highly for its access to a rail stations but at the same time very weak (the lowest possible rating) for access to an Arterial with High Frequency Transit namely 400m from high frequency routes.

Buses provide most of the public transport capacity from Johnsonville, Khandallah and Ngaio to Wellington CBD. If the Johnsonville train was truly “mass rapid transit” then the additional bus capacity would not be required. The Greater Wellington transport review provided Double Decker buses on the Number 1 route from Johnsonville every ten minutes in order to create a high frequency service. I believe bus the preferred option for most commuters from Khandallah and areas north because of a faster journey time, a far more frequent service and better access to the CBD rather than being left stranded at the Railway Station.

Despite these serious limitations, WCC has chosen to interpret the NPS-UD 2020 as dictating that WCC should enable additional population of up to 12000 people near stations on the line (3237 – 4181 in Khandallah, 354 – 467 in Crofton Downs, 1247 – 1469 in Ngaio on top of the 5018 – 6008 anticipated for Johnsonville) because there is access to an already at capacity nineteenth century train service.

The WOSA&E confirms this contention. Khandallah does not have access to an Arterial with High Frequency Transit, namely 400m from high frequency routes. On this analysis the Johnsonville Branch Line service does not meet the definition of mass rapid transit and therefore the Council is not required by NPS-UD 2020 to enable six storey buildings near its stations.

Action I would like WCC to take:

Remove the requirement to enable six storey buildings near stations on the Johnsonville Branch Line as the train service does not meet the definition of mass rapid transit.

THREE WATERS CAPACITY IN KHANDALLAH IS NOT SUFFICIENT TO SERVICE THE LEVEL ON DENSIFICATION PROPOSED

The Wellington Water report provided in the resources section of the DSP material suggests the investment needed in three waters infrastructure to support growth proposed for Khandallah in the DSP is \$100million to \$200million. I quote from the report below. Bolded mark-ups are mine.

Mains:

“To accommodate the proposed growth, 0.8 km of main needs to be upgraded to 300 mm diameter on Cockayne Road from the intersection of Punjab Street to Clutha Avenue and 1.3 km of main needs to be upgraded to 200 mm diameter from Clutha Avenue, Agra Crescent, and Cashmere Avenue to the end at Ranui Crescent.”

“There are about 37 km of distribution network in the Khandallah suburb, which 13 km are Asbestos Cement pipes. It is recommended to replace the Asbestos Cement pipes over time. There are also about 10 km of pipes with other materials which have been installed more than 70 years ago and would be close to their end of life cycle when the proposed growth developments are fully implemented and are not included in estimates.”

Comment: How will this be funded?

Water Supply

“Existing water reservoirs in Johnsonville and Khandallah suburbs can interchangeably be used to supply water especially during a seismic event. A preliminary analysis indicated that in order to accommodate the projected growth in Johnsonville and Khandallah suburbs, there would be around 9 ML additional water storage required (6 ML for Johnsonville and 3 ML for Khandallah) of which 3 ML is to cover for current shortfall. **At least two reservoirs with the total capacity of 9 ML would be required to supply these two suburbs.** Further investigations are needed to confirm the actual capacity, number and location of those required reservoirs.”

Comment: There is no indication in the Spatial Plan of where these reservoirs might be located and how they might be funded.

Wastewater

“Wastewater from the Khandallah growth area is conveyed to the Moa Point WWTP for treatment and disposal.

Around 3.1 km of pipe upgrade have been proposed for current deficiencies. **In general, there is lack of capacity in the local wastewater network** in and around the constructed wastewater overflow at Khandallah Tennis Club. **High levels of inflow & infiltration also**

exist in this catchment and as such the trunk wastewater from Khandallah to Ngauranga Gorge is undercapacity. Renewal of 1.8 km of poor condition wastewater pipes are needed to address water quality.”

Comment: It seems irresponsible to facilitate major densification when there is already undercapacity.

Stormwater

“The Khandallah area has not been modelled and likelihood of major flooding problems is unknown. However, like many other areas around Wellington Region, it is likely that this area would experience some flooding. It is assumed 800m of main stormwater pipes would require upgrading. There are opportunities for water quality improvements in this area within the medium density locations and these costs have been included.”

Comment: Current stormwater in many parts of Khandallah relies on above ground flow down street gutters to sumps that do not drain quickly enough to avoid on street flooding. Climate change is leading to more frequent periods of intense rainfall so this problem will only get worse. More paved areas and increased site coverage will exacerbate flooding risks during intense rainfall events.

These infrastructure issues are replicated across Wellington. The WOSA&E observes: “There is no guarantee that the suburbs that make the most sense to develop medium density will do it in the order that is preferred - making it harder to plan transport and water infrastructure investment. However, some suburbs can have the additional infrastructure applied incrementally and generally at a lower cost. They may become the logical places to invest earlier even if they are not the closest suburbs to the city centre, such as Tawa and Johnsonville. It would make sense to work with developers and council staff to try and predict the possible staged delivery of medium density per neighbourhood to help inform the staging of infrastructure investment.”

Comment: Failure to follow this advice could result in unpredictable three waters infrastructure crises across the city which will have to be dealt with on no notice and at very substantial ratepayer expense.

Action I would like WCC to take:

Follow the advice contained in the WOSA&E to identify suburbs that can have additional infrastructure applied incrementally and generally at a lower cost even if they are not the closest suburbs to the city centre such as Tawa and Johnsonville. The Council should strongly encourage staged delivery of densification in those areas first rather than taking a citywide approach to the Outer Suburbs.

Remove the proposed six storey proposal for Khandallah altogether and adjust the remaining proposals for densification to match the capacity of three waters within Khandallah.

NO INFORMATION ON CAPACITY OF THE ELECTRICITY NETWORK

I have not been able to find information in the supporting materials about the capacity of the electricity supply to support growth but I consider electricity is a crucial issue and need to be explained.

Action I would like WCC to take:

Investigate and provide information on whether the current electricity network can meet the demands imposed by the growth contemplated in the DSP and if not provide an estimate of the likely costs of upgrades required.

WCC MUST RETAIN POWER TO REGULATE PARKING

Wellington City Council submitted in the NPS-UD consultation that it would prefer to retain the ability to require off street parking.

“The Council considers that options 1 and 2 could lead to adverse effects or perverse outcomes particularly in areas that it is still desirable that car parking is provided to manage spill over effects (e.g., general residential areas). This is particularly the case in Wellington with many narrow and winding roads even in general residential areas in the suburbs, where streets are often already fully parked. The Council is reviewing the Parking Policy and about to undertake a full review of the District Plan and these matters will be fully considered. The reviews need to be done in a way that works for Wellington City. For example, we may want to require on-site parking in areas where we do not want on-street parking, for example on priority bus and cycle routes.”

I note that the vast majority of submitters, almost 80%, to the MFE consultation on NPS-UD 2020 supported Council’s being able to require off street parking.

“There was general concern about the increased pressure for on-street parking, and worries that the costs of providing parking would be transferred from developers to ratepayers.”

“The main reason that submitters did not support the proposal was because they noted it might cause parking overspill, which would result in increased costs of managing car park use. Some questioned whether parking was a significant cost compared to the costs associated with other rules typically found in district plans. A small number were concerned that the policy might disproportionately affect low-wage households, where parking costs would increase as supply decreases. There were concerns that there are limited alternatives to car use in many locations.”

<https://www.mfe.govt.nz/sites/default/files/media/Towns%20and%20cities/FINAL-NPS-UD-Summary-of-submissions.pdf> (page 31)

Action I would like WCC to take:

I believe the Council must act in the best interests of ratepayers and residents and push back on NPS-UD 2020 to retain the right to control the amount of parking included in most new developments but especially in the Outer Suburbs where it seems most likely that the

majority of householders will have at least one car for the foreseeable future. I do not support developers transferring the cost of parking to ratepayers.

POPULATION INCREASE ESTIMATES ARE TOO HIGH

The DSP is a response to an extremely optimistic estimate of population growth in Wellington over the next thirty years. I consider the overall estimates on which the DSP is based for the city as a whole, and for Khandallah in particular, are too high.

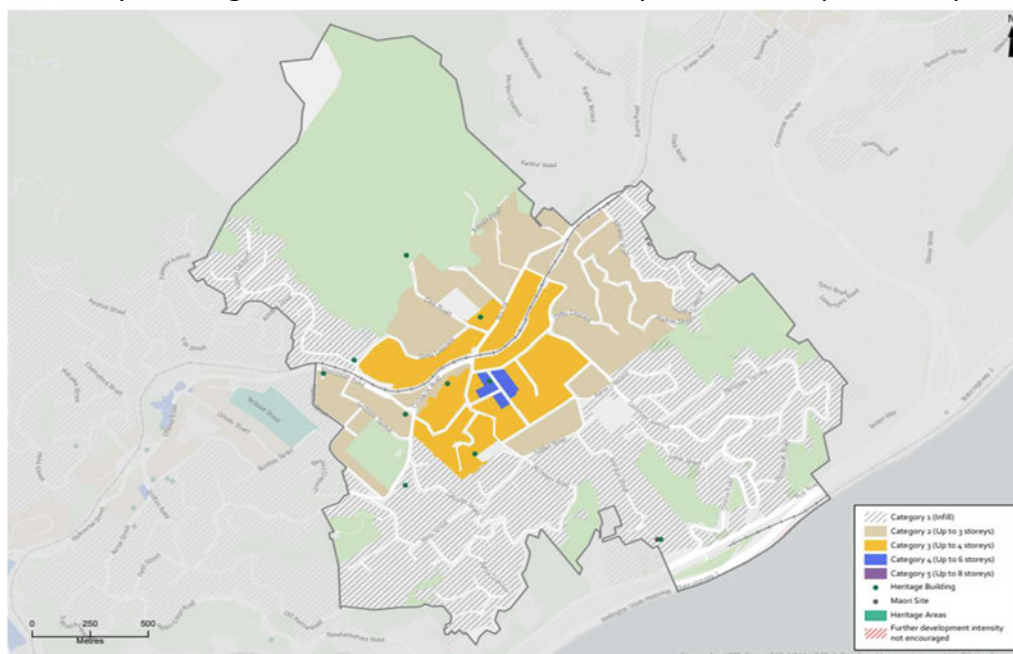
According to <https://forecast.idnz.co.nz/wellington> numbers which were last adjusted in November 2019 by .id, the population experts, on behalf of Wellington City, the Wellington City population forecast for 2020 is 214,537, and it is forecast to grow to 248,953 by 2043. This is an increase of 34,416. The Spatial Plan contemplates an 80,000 increase which is more than double the forecast.idnz numbers.

The same website forecasts the population of Khandallah plus Kaiwharawhara and Broadmeadows to decrease by 598 over the period 2013 to 2043.

<https://forecast.idnz.co.nz/wellington/population-age-structure-map>

The WOSA&E at p.63 on the Western Suburbs has a map appended which shows up to six storeys only in the commercial centre immediately surrounding Khandallah Village and the estimate of possible additional housing is stated as 1469. (See map on next page)

Even if we allow for no change or even a 400 person increase to the population of Khandallah the allocation in the DSP is far too high. If the WOSA&E map is correct then the six storey buildings on the rail corridor are on any estimate surplus to requirement.



Action I would like WCC to take:

Revise the DSP to allow for a more realistic increase in population of 50,000 (a reasonable compromise between 34,416 and 80,000) for the city as a whole and say 400 in Khandallah. Allowing for a 29% uptake of infill as shown in the Citywide Estimated Growth Distribution

Figures 25/09/2020 would provide around 428 new dwellings which still seems to be in excess of the number of dwellings likely to be needed to meet the forecast.idnz growth projections.

EXISTING SECTION SIZES AND CONFIGURATIONS SEVERELY LIMIT DESIGN POSSIBILITIES FOR MEDIUM DENSITY HOUSING OR APARTMENTS AND WILL RESULT IN SUBOPTIMAL OUTCOMES

Wellington, and in fact most of New Zealand, was originally subdivided into quarter acre sections with a narrow frontage contemplating a decorative front garden, a house centred on the lot, and provision for a vegetable garden and utility areas at the rear. Subsequent “progress” required provision to be made for garages which have either been placed to the rear of the dwelling where possible or to one side where the width of the section precludes access to the rear. In newer or modernised houses, the garages are often integrated into the ground floor level to provide internal access to the dwelling.

In contrast already constructed medium density developments demonstrating best practice design features such as the Agra Crescent apartments shown in much of the “publicity material” made available by the Council feature a long horizontal frontage. The best design the council can hold up as an example was only able to be achieved because the site on which the apartments sit was formerly the site of the Khandallah Fire Station and therefore larger and quite differently configured from the rest of the suburb. The same applies to the development which replaced the garden centre in Crofton Downs, and the Monterey Apartments in Glenside. Unless the Council proposes to compulsorily acquire land at market prices and amalgamate existing sections (an action which in the Outer Suburbs I would consider draconian and unnecessary) it is difficult to understand how optimal apartment buildings can be achieved given the current section layouts.

Taller buildings on some of the south facing slopes in Khandallah could be less likely to cause shading and all properties could share a harbour view but these areas appear to be left with the existing infill rules which are not contemplated to change under the DSP. “No change” indicates that much of Khandallah will be restricted to single storey infill on section sizes under 800m². There seems no logical reason why some parts of the suburb which are closer to the CBD are more restricted than others which have proximity to an old railway line.

Action I would like WCC to take:

Reconsider allowing more dense infill throughout the Outer Suburbs of 2 to 3 storeys and formulate appropriate recession planes and view shafts to ameliorate the detrimental effects on neighbouring properties of the broader right to infill. Such a decision would distribute the downsides and benefits of densification more fairly across all properties.

DEMOGRAPHICS OF MANY SUBURBS INCLUDING KHANDALLAH THROUGH TO 2047 WILL BE INCREASINGLY ELDERLY AND DPS MUST PLAN FOR THIS SITUATION

The kind of housing proposed for central Khandallah and foreshadowed in the Spatial Plan appeals to students and the young workforce who are prepared to give up space and access to personal outdoor areas in return for no commuting and associated transport

costs. Historically these people will be away from their houses for most of the day so noise of passing trains is less of a detriment. Post-Covid more people may be working from home so peace and quiet may turn out to be more highly valued than proximity to a railway line. Retired people spend a far greater part of their day at home and for them the noise of a train rumbling past every fifteen minutes will represent a significant negative impact on their quality of life.

The resistance to commute time and cost of transport (public and private) from Khandallah to the city is reflected in the lower number of students and young workforce relative to Wellington City as a whole.

Statistics for the Khandallah are divided into Khandallah North, Khandallah South and Khandallah Reserve by idnz demonstrate my point.

“The major differences between the age structure of Khandallah Reserve and Wellington City were:

- A *larger* percentage of 'Older workers and pre-retirees (50 to 59)' (17.3% compared to 12.4%)
- A *larger* percentage of 'Secondary Schoolers (12 to 17)' (10.4% compared to 6.6%)
- A *smaller* percentage of 'Young workforce (25 to 34)' (7.3% compared to 17.9%)
- A *smaller* percentage of 'Tertiary education and independence (18 to 24)' (7.8% compared to 14.0%)

The major differences between the age structure of Khandallah North and Wellington City were:

- A *larger* percentage of 'Primary Schoolers (5 to 11)' (11.2% compared to 7.9%)
- A *larger* percentage of 'Older workers and pre-retirees (50 to 59)' (15.7% compared to 12.4%)
- A *smaller* percentage of 'Young workforce (25 to 34)' (9.5% compared to 17.9%)
- A *smaller* percentage of 'Tertiary education and independence (18 to 24)' (5.8% compared to 14.0%)

The major differences between the age structure of Khandallah South and Wellington City were:

- A *larger* percentage of 'Empty nesters and retirees (60 to 69)' (12.6% compared to 8.0%)
- A *larger* percentage of 'Secondary Schoolers (12 to 17)' (9.4% compared to 6.6%)
- A *smaller* percentage of 'Young workforce (25 to 34)' (9.3% compared to 17.9%)”

The Spatial Plan does not take account of this reality. Given the impact of the home environment on physical and mental well-being, getting housing right for the demographic who will live there is an important health issue.

Recent New Zealand research tells us: “Clear housing preferences were expressed (by older New Zealanders) for a home that maintains independence, is warm and easy to maintain, easy to move around in, affordable to buy or rent, has cheap running costs, is compact but has sufficient space for activities and visitors, is close to services and has an outlook.” (Bev Lorraine James & Kay Saville-Smith (2018): Designing housing decision-support tools for resilient older people, Architectural Science Review <https://doi.org/10.1080/00038628.2018.1505597>)

Factors listed in the research are listed below with my comments noted on how the kind of housing proposed for Khandallah in the DSP measures up.

Solar orientation - likely to be reduced due to shading from new tall buildings

Outlook - likely to be blocked new tall buildings, in the case of the southern side of the railway line the immediate northerly view will be the train track and rough untended land immediately adjoining it.

Privacy - likely to be reduced due to neighbours looking in from adjoining high buildings

Storage - garages often meet this need but the Spatial Plan states these are not necessary.

Resilience – Mid height buildings did not fare well in the Kaikoura earthquake.

Accessibility - Unless apartments span a single floor, stairs will be required hampering accessibility.

Space for visitors, hobbies or carer

Close to family, friends

Close to retail, services, recreation – Khandallah scores well for this criterion.

Flat terrain – Some of Khandallah offers this possibility

Safe neighbourhood - Khandallah scores well for this criterion.

Green spaces – There are no public green spaces provided in the DSP within the area proposed for the most densification in Khandallah. The small area outside the Khandallah Library is now totally taken up by a children’s play area.

Views – Currently there are expansive views of Mt Kaukau from almost all parts of the valley floor in Khandallah. Six storey buildings will block a lot of those views.

Transport – There is access to good transport connections in Khandallah although many of the access points to stations on the Johnsonville Line involve stairs, steep paths and uncontrolled road crossings. It is my impression that most elderly people use the buses and in off peak times.

Shopping – Daily needs of elderly are well provided for in Khandallah but travel outside the suburb is required for hardware and garden supplies, clothing and shoes, books and stationery, eating out, toys, and tech supplies and repairs. In earlier years many of these items were available in Johnsonville but the mall has been deteriorating for 30 years and it no longer offers most of the goods and services I cannot obtain in Khandallah.

People with mobility limitations often need features like zero-step entrances and wide interior doorways in order to reside safely and comfortably in their homes. In addition,

people with disabilities can only visit others if visitability criteria are met. The United Kingdom assesses homes for four accessibility features that provide visitability: level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space for wheelchairs or walkers, and a toilet at entrance level. For homes I would add a bedroom and a shower or bath also on the entrance level.

Action I would like WCC to take:

I urge councillors, and the planners they employ, to consider more fully the implications of aging and disability as they work to develop and implement housing plans and policies for our city. Raising the number of accessible homes in our city will benefit currently disabled people, their caregivers, their families and friends, those who become disabled in the future, and society as a whole. Multi-storey apartment buildings unless very carefully designed are generally not accessible nor visitable.

ENCOURAGING DEMOLITION OF EXISTING QUALITY HOUSING STOCK IS WASTEFUL AND ENVIRONMENTALLY IRRESPONSIBLE

Khandallah tends to have owner occupied homes which, although in some cases over a hundred years old, have been well maintained and often substantially renovated. To encourage the demolition of well-maintained homes which are warm, dry and solid is environmentally irresponsible and wasteful.

The lifespan of a housing unit (i.e., the period over which it provides dwelling services) is determined primarily by the quality of its design and construction, its exposure to hazards, and the extent of maintenance and renovation it receives. Theoretically, the lifespan of a unit could be extended almost indefinitely if sufficient resources were devoted to that end. Nudging maintenance and upgrading to recycle exiting housing stock is preferable to demolition.

The DSP process misses the opportunity to present a comprehensive urban renewal plan aiming to repair or replace housing which is cold, damp, energy inefficient and at the end of its useful life with new quality housing appropriate to the demographic likely to occupy it while promoting conservation of quality housing stock wherever possible.

THE CHARACTER OF KHANDALLAH IS ITS CONNECTION TO THE NATURAL ENVIRONMENT AND THE SURROUNDING HILLS

Khandallah is a green and leafy suburb. Trees and gardens as well as views to the surrounding hills and the harbour are what make Khandallah special. It is enfolded and nestled within the hills. Mt Kaukau is loved as a recreation facility and a landmark; it is our maunga. Members of Predator Free Khandallah have been working hard to clear rats, mice, stoats and hedgehogs from the suburb and we are beginning to see the benefits of increased birdlife including native kaka, kereru and tui as well as increasing numbers of exotic birds such as tauhou, starlings, blackbirds, thrush, and the ubiquitous sparrow.

We have been encouraged and supported by Wellington City Council in our efforts but are now likely to see loss of trees and gardens to allow for huge apartment buildings which will reverse our efforts to reinstate the birds.

There are a number of matters identified in the WOSA&E that address the issue of character and I refer particularly to pages 10-11. The general tenor is that the Medium Density Housing consented by WCC to date in the Outer Suburbs does not meet the standard of Density Done Well.

- “(it was) the space between the building and the front boundary line and the associated landscape (of current medium density housing in Wellington) that had the most negative visual impact on the public realm and views across the street from neighbouring properties. In almost all cases the landscape space was insignificant in depth/setback and the traditional trees and gardens had been replaced by buildings with insignificant new planting to offset that building bulk. **This is not an unusual or inappropriate outcome in inner city/city centre communities but is not in keeping with the green outer Wellington neighbourhoods.**” (My bolding).
- “In many cases there was not enough front landscape setback from the road easement to plant a large tree species. This means that if existing mature trees are cut down it is not possible to plant a new tree to offset the mature tree that was lost due to lack of space. ...if a large tree was planted these space(s) are too narrow to allow that large tree species to grow to maturity and as such is likely to be heavily trimmed back or removed all together at a later date. **This is noticeable in the complete lack of mature trees on older medium density housing developments around Wellington that we visited.** (My bolding).
- “New medium density houses that we observed during site visits were typically **2-3 storeys** and, in most cases, located closer to the street edge than the existing residential dwellings... this change reduces the residential landscape visual amenity from the street view changes the human scale of the street by having taller bulkier buildings closer to the street edge compresses the visual environment.

Comment: This assessment was made in the context of 2 to 3 storey buildings when the DSP now proposes:

Mixed use and apartment buildings (type 4b): at least 6 storeys enabled in the Khandallah commercial centre and within a 5-minute walking catchment of railway stations and Medium density housing (type 3): 3-4 storey small apartment buildings adjacent to the Khandallah commercial centre.

The loss of amenity from these larger buildings will be even more significant.

- In Khandallah Village “there is no open space associated with the town centre, or immediate proximity, and limited planting within the streetscape. Connections to the wider open space network are distant and not immediately available.”

Comment: The DSP contemplates more dense housing but has no suggestion of where there will be public open space.

The DSP contemplates up to four storey buildings in Khandallah when the WOSA&E comments that even 2 to 3 storey buildings if not done well detrimentally affect amenity and are not in keeping with Wellington's green outer suburbs. The DSP does not give any indication of how the Council will facilitate more dense housing in keeping with the green outer Wellington neighbourhoods. The only suggestion seems to be more street trees. The reality is that trees need a lot of care and attention to thrive in Wellington's harsh conditions. The Council does not attend to the street trees and road reserve now. I know as I have spent many a day on my hands and knees weeding the road reserve in front of my house and planting it at my own expense. I cannot see the Council taking additional responsibility for street trees and I expect any replanting will just end up the same scruffy specimens as we have now but with ten years less growth on them.

I would like to conclude this section by inserting a quote from the decision of the Environment Court Decision of 16 July 2013 in an appeal between the Johnsonville Community Association and the Wellington City Council.

[31] These non-statutory documents provide many laudable aspirational visions and statements designed to provide for the future needs of the community. However since these documents do not have the status of rules, and given that it is accepted that some of the poor standard in-fill development has produced significant privacy, access, and general residential issues, it is understandable that the appellant, and others concerned about PC 72, are concerned about how effective these documents will be in preventing further unattractive in-fill development in their suburb. We return to the issue of the Design Guide(s) under a discrete head.

UNIVERSITIES SHOULD BE ENCOURAGED TO PROVIDE MORE STUDENT ACCOMMODATION

The number of students drawn into Wellington CBD especially by Victoria University puts huge pressure on housing in the CBD. In the USA campus accommodation is provided by the many universities for all students. At present first year students are given places in halls of residence and then tossed to the ravages of the market for the remainder of their study period.

I would like to see increased collaboration between the Universities and the Council to make sure that the University can create more accommodation for the students they bring into Wellington City. Dedicated supply for students could free up more of the general supply for other renting cohorts such as young professionals and families.

Action I would like WCC to take:

Enter into discussions with the universities to work toward dedicated university supplied accommodation for students.

FINAL COMMENT

Thank you for reading. I love Wellington and I hope to live out my days here. I would be very sorry if hasty actions let us grow into somewhere that is no longer liveable or loveable.

Julie Ward

3 October 2020

[REDACTED]

From: [REDACTED]
Sent: 09 October 2020 20:46
To: BUS: Planning For Growth
Subject: Tony Randle Submission to the WCC Spatial Plan
Attachments: 201009 Tony Randle Submission to WCC Spatial Plan.docx

Categories: Blue Category

Hi

Thank you for the additional time to prepare my submission to the WCC Spatial Plan.

Please find my submission attached.

Can you please confirm the WCC's receipt and acceptance of this submission ?

Regards

Tony Randle

Individual Submission: *Our City Tomorrow*: Draft Spatial Plan for Wellington City

Name (first and last) *: Tony Randle

Email address *: [REDACTED]

I would like to receive a copy of my submission by email

- Yes

Postal address: _____

Suburb * (Please Delete those not appropriate)

- Johnsonville

Phone number: [REDACTED]

Age range * (Please delete those not appropriate)

- [REDACTED]

Household *

-- Please Select (Please delete those not appropriate)

- [REDACTED]

Preferred method of contact (Please delete option not appropriate) *

- Email

I would like to sign up to our email newsletter and receive news and updates regarding Planning for Growth (Please delete those not appropriate)

- Yes

I am making this submission - (Please delete those not appropriate) *

- as an individual

To what extent do you agree or disagree with what is proposed with intensification in the Central City.

- **Strongly Agree**

To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs.

- **Strongly Disagree**

To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs.

- **Strongly Disagree**

We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution? *

- **Strongly Disagree**

If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

- Firstly, the WCC claim that Wellington City will grow by 80,000 people must be challenged. It has not provided any substantive evidence of how it determined this future when it is clear we suffer from the highest cost housing and our poor track record of actually building houses.
- Wellington is a city living far beyond the capacity of its supporting infrastructure including 3 Waters and transport. It is wrong to plan to add so much new housing without first rectifying the infrastructure deficit.
- Wellington's geography and vulnerability from earthquakes means we have high cost housing and infrastructure irrespective of the areas chosen for residential growth. Many areas are high risk from earthquake effects attracting very high insurance costs especially for building above three storeys. This means the proposed approach focussed on housing tens of thousands through building infill high rise apartments in a few chosen suburban areas, such as Johnsonville, creates unsustainable pressure on these areas.

The WCC has attempted this approach since 2013 by imposing Medium Density Residential Areas on Johnsonville and Kilbirnie. It is clear that it's predicted growth in new affordable "density done well" housing in these areas has failed. Even worse, few multi-unit developments have been built in compliance to the District Plan rules. The WCC's desperation to get new housing has led to most new developments breaking what are already liberal rules for set-backs and parking which planners have consistently permitted on a non-notified basis.

After promises that MDRA would provide improved housing and amenity, the actual result are imposing box units which are worse than the housing they replace.

For over a decade, WCC is supposed to have been following its Urban Development Strategy¹ that states the distribution of population growth should be:

- 34% Greenfields
- 30% suburban in-fill, and
- 36% central city and inner suburbs, including apartments.

This new spatial plan has radically changes the UDS target areas to the following:

- 6% Greenfields
- 68% suburban infill, and
- 26% Central City.

I support the continuation of that long-standing and fundamentally sound approach. WCC needs to ensure that this pre-existing strategy can work, such as following these recommendations:

- **GREENFIELDS:** Rural land close to the city boundary should be considered for rezoning for residential development.
- **SUBURBAN INFILL:** suburbs across the city to continue the current trend of infill and brownfields housing developments.
- **CENTRAL/INNER CITY:** All international best-practice points to more and higher-density residential developments within walking distance of the city. This should be expanded in Wellington to allow the highest possible residential intensity in areas within a 10-minute walking distance of the city's two biggest employers, Wellington Hospital (Newtown) and Victoria University (Kelburn campus).

To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs.

- **Strongly Disagree**

We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you? *

While I support **Heritage Protection**, I do NOT support **Character Protection** of inner suburbs. Suburban Character Protection is far less important than ensuring that more people have a chance to find affordable housing.

Dramatic increases in the available residential accommodation close to the city centre is the most important single action. Living close to the central city is the preferred place for a large portion of all residents because it is where people can access the vibrant city centre, including its work, cultural and sporting opportunities.

¹ WCC Residential Housing Study - final-report (Sep 2014)

easily and efficiently, without clogging roads or wasting resources on transport unnecessarily.

What amenities would you want to help create a vibrant suburban centre? (*please pick your top 5 from the options below*) *

- Proximity to parks and open space
- Access to public transport
- Public/shared spaces
- Commercial activity (retail, cafes, local businesses)
- Employment opportunities
- Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.)
- Infrastructure (stormwater, water supply, wastewater)
- Social services and community facilities
- Medical facilities/centres
- Access to cycleways/routes
- Walkability within the centre
- Easy walking distance to the centre

Other (please specify)

This is a stupid question because all the above are important to having “a vibrant suburban centre”. Also different suburbs face different deficiencies in amenity and so there cannot be one correct answer to this question.

Even if there are some amenities that are more important than others, identifying the most important ones certainly should **not** be by surveying the public across the city. Having this question only indicates WCC urban planners do not know what they are doing.

What amenities would you want to see around future mass rapid transit stops? (*please pick your top 5 from the options below*) *

- Public shared spaces
- Landscaped spaces/plantings
- Parks and playgrounds
- Shops and businesses
- Cafes and restaurants
- New housing
- Community facilities (libraries, community spaces, social services, etc.)
- Child care
- Medical facilities/centres
- Bicycle parking

Other (please specify)

Another stupid question because all the above could be important for having “around future mass rapid transit stops”. Also different around future mass rapid transit stops face different deficiencies in amenity and so there cannot be one correct answer.

*Click the image to expand the fact sheet or [view the full draft spatial plan here](#)
To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

- **Strongly Disagree**

COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb? *

Parks, Supermarket, Suburban Mall

What amenities or facilities were missing or could have been improved? *

Parks in central Johnsonville

What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

Nothing, it's is not even a proper Spatial Plan. This is a City Zoning Plan as it is missing key information to justify and support its proposed changes to residential zones across the city.

What would you change or improve?

The Johnsonville Station is not a Rapid Transit Stop

A key error in the Spatial Plan is to have a 10 minute walkable catchment around Johnsonville Station because it is defined as a Rapid Transit Stop in the Spatial Plan. The National Policy Statement on Urban Development (NPS-UD) defines:

***rapid transit service** means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic*

***rapid transit stop** means a place where people can enter or exit a rapid transit service, whether existing or planned*

While the Johnsonville Line does meet the criteria of a “... *reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is*

largely separated from other traffic” it fails on the first two Rapid Transit criteria of being “frequent, quick, ”.

The following table outlines the frequency and “quickness (i.e. travel time, and speed) of the Johnsonville Line to PT services from other parts of Wellington in travelling into the CBD at **77 Lambton Quay** (which is near Wellington Station):

| From | Peak Service Frequency | Peak Hour Travel Time | Travel Speed |
|------------------|------------------------|-----------------------|--------------|
| Johnsonville | 4/hour | 27 min | 20kmph |
| Newtown | 23/hour | 26 min | 9kmph |
| Karori | 15/hour | 20 min | 25kmph |
| Kilbirnie | 12/hour | 31 min | 11kmph |
| Tawa | 4/hour | 19 min | 51kmph |
| Waterloo, L Hutt | 8/hour | 20 min | 52kmph |
| Porirua | 7/hour | 22 min | 55kmph |

Of course, 77 Lambton Quay is at the northern end of the CBD close to Wellington Railway station. The poor performance of PT services from Johnsonville is much clearer if travelling to **1 Willis Street** which is closer to the centre of the CBD employment zone:

| From | Peak Service Frequency | Peak Hour Travel Time | Travel Speed |
|------------------|------------------------|-----------------------|--------------|
| Johnsonville | 4/hour | 34 min | 17kmph |
| Newtown | 23/hour | 19 min | 10kmph |
| Karori | 15/hour | 27 min | 25kmph |
| Kilbirnie | 12/hour | 24 min | 13kmph |
| Tawa | 4/hour | 26 min | 39kmph |
| Waterloo, L Hutt | 8/hour | 27 min | 41kmph |
| Porirua | 7/hour | 29 min | 44kmph |

The “Rapid Transit” service from Johnsonville Station has the worst service frequency and the longest PT travel time of any suburban centre into the Wellington CBD! Compared to other Wellington PT services, the above information shows the rail service from Johnsonville, is both infrequent and slow and so fails to meet the criteria to be defined as a “Rapid Transit Stop”

In contrast, in terms of both PT frequency and short travel time (i.e. fast), the bus service from Newtown clearly comes much closer to meeting the criteria for a Rapid Transit Service as outlined in the UPS-UD:

| | |
|---|--|
| frequent | 23/hour |
| quick | Suburban Centre with the fastest peak hour Travel time into the CBD |
| reliable | 99.4% Reliable (#1 Routes Metlink) |
| high-capacity | 23/hour |
| operates on a permanent route (road or rail) that is largely separated from other traffic | Bus lanes along most of the route from Newtown to and through the CBD. |

And if the Johnsonville Line was really a Rapid Transit service as claimed by the Spatial Plan, then its superior PT performance would be seen in a high rail mode share and low car mode share compared to other suburbs. However data from the 2018 census proves otherwise:

| Location | Car Mode | Active Mode | Bus Mode | Rail Mode |
|------------------|----------|-------------|----------|--------------------|
| Johnsonville | 56.0% | 8.0% | 17.9% | 10.6% ² |
| Newtown | 26.6% | 34.9% | 30.1% | 0.7% |
| Karori | 49.5% | 9.1% | 22.0% | 0.3% |
| Kilbirnie | 40.8% | 18.1% | 29.8% | 0.6% |
| Tawa | 52.8% | 5.5% | 1.9% | 30.8% |
| Waterloo, L Hutt | 58.0% | 6.3% | 2.0% | 24.9% |
| Porirua | 59.5% | 21.4% | 0.0% | 9.5% |

Johnsonville has an overall PT mode share for similar to other Wellington City outer suburbs served by bus services and also has the highest car mode share of any suburban centre. The high car mode share shows how unattractive alternative modes of travel are for this area which is a key element of supporting higher density housing under the Spatial Plan.

But perhaps the strongest indicator that the Johnsonville Station is not a Rapid Transit Stop is more PT commuters travel from Johnsonville by bus than travel by train. Indeed, the Census shows that more residents who live beside the railway station bus to work than take the train!

In contrast, in terms of a suburb showing evidence of being served by Rapid Transit, then Newtown most clearly meets the criteria of high PT mode share (over 30%) and low car mode share(<30%).

Johnsonville Station is **not** a Rapid Transit Stop as defined by the UPS-UD but if it then **the bus service to Newtown clearly also meets the same criteria and so must also be defined as Rapid Transit under this Spatial Plan.**

² It must also be noted that commuters pay 25% less to travel by rail than bus which also boosts rail usage.

The Spatial Plan walking catchment for Type 4 housing based on Johnsonville Station and Raroa Station both being Rapid Transit Stops is faulty because the rail service from these stations does not meet the criteria to be Rapid Transit. The PT rail service from Johnsonville is not a good alternative to driving or even bus PT for the majority of residents and trying to add housing on this false assumption will not deliver the outcomes sought by the Spatial Plan.

Other Transport Related Feedback for Johnsonville

Firstly, the 10-minute walkable catchment for the Johnsonville residential area is the current Medium Density Residential Area, not the much larger area proposed under the Spatial Plan. The MDRA was established as a 10-minute walking catchment by the WCC under District Plan Change 72 and the exact area was confirmed by the Environment Court decision of 2013. **The Johnsonville MDRA is the 10-minute walking catchment for central Johnsonville.**

The walking catchment model used to calculate walking catchments appears to be faulty, at least as applied to Johnsonville 10-minute walking catchment. The WCC states the model uses an assumed a walking speed of 5kmph. As 10 minutes is 1/6 of an hour, this means an assumed walking distance of $(5 * 1/6) = 0.833\text{km}$ or 833 metres.

Comparing the modelled 10 minute catchment in proposed by the Spatial Plan using Google Maps shows the model consistently exceeds the predicted distances and, especially, the 10 minute walking time. More importantly, the model seems to be ignorant of the topology in Johnsonville with no apparent adjustment for the steep slopes and even steps on routes. It also does not adjust to the absence of pedestrian crossings or the high traffic levels on some of the roads that must be crossed. **The WCC walking model is incorrect in its assessment of the Johnsonville area.**

It is also obvious to the community that the planners behind the Spatial Plan have never visited the walkable catchment areas where they proposed major, long-term changes to housing rules! That the WCC Spatial Team have not done any sites visits as part of developing this plan is now confirmed by the WCC,

It is bad enough that the city is proposed major changes to suburbs without first doing direct community engagement but it is simply unacceptable and unprofessional to propose changes to areas that planners have never even visited. All proposed changes should be properly analysed and considered before they are put to the public. It appears the city puts more effort into Traffic Resolutions to put in yellow lines than it does for proposals to change District Plan rule changes to whole suburbs. It is amazing this has to be said but **planners must first visit areas they want to change.**

The Spatial Plan impact areas for suburbs should consider the whole journey time, not just walking access to the bus stop or rail station.

Access to the CBD by train is limited because Wellington Rail Station is at one end of the CBD. As shown in the tables above, most rail “Rapid Transit” commuters must walk some distance from Wellington Station which means the Spatial Plan 10 minute catchment outlined for Johnsonville really assumes commuters must spend 15 minute to work.

Access from Johnsonville by bus is also very slow because buses get caught in congestion:

- travelling through Johnsonville to the Moorefield bus stops
- travelling through Johnsonville to SH1
- in the morning, travelling down SH1 and along Old Hutt Road and along Thorndon Quay
- travelling along the Golden Mile

Without congestion, bus travel from the Johnsonville hub to Courtney Place is 26 minutes but during the peak time, when most residents travel into work, it is scheduled to take up to 42 minutes but often takes longer.

Because walking time in the CBD is not factored into the PT catchment and the fact the PT travel times from Johnsonville to the CBD are the longest from any major suburb, **the correct walking catchment for Medium Density Residential Housing should be 5 minutes from Johnsonville Station, not 10 minutes as proposed.**

Finally, the Spatial Plan does not properly consider the fact that 1 in 5 residents in Johnsonville (and most northern suburbs) do not work travel south to work but travel north or west to the Hutt Valley ... there is no direct PT service from Johnsonville to support travel to the north or east which is one more reason why so many drive.

Other Feedback Comments

The consultation process – for such an enormously significant piece of work - has been inadequate. The communication has been poor so most residents still do not know this consultation is happening.

The recommendation to halt expansion of Greenfield development from the previous Planning for Growth Scenarios engagement has been accepted by the Spatial Plan even though the alternative Scenarios have been radically changed. In particular, the Suburban Centre Focus was stated as:

This would see more townhouses in most suburban centres. Apartments up to six storeys would be needed in Newtown, Berhampore, and around the Kilbirnie town centre, in addition to apartments up to 15 storeys high in the central-city.

The Spatial Plan has totally changed the predicted future for suburbs both in requiring 6 storeys in suburbs where “more townhouses” were predicted and removing 6 storeys from suburbs such as Kilbirnie and Berhampore. I am sure the WCC would have had a much greater response in favour of Greenfield development from suburbs such as Johnsonville, Karori, Khandallah and Tawa if we knew the WCC planners intended targeting such high levels of infill housing as now planned under the Spatial Plan. WCC planners essentially lied to the public in its 2019

Growth Scenarios consultation in order to remove consideration of expanding the area of Greenfield development in the proposed Spatial Plan itself.

The Spatial Plan represents an abandonment of WCC's responsibility to support its targeted level of Greenfield residential development. In doing so, WCC appears to have given up trying to curb land speculation (especially in the northern suburbs).

This set of Spatial Plan consultation documents is enormous – ordinary people would need 6 months to digest this data and provide an informed response. Key information is only in the online map ... there is no normal document that contains the proposed Spatial Plan changes. This submission has taken many hours of reading and analysis.

Key information such as population on the impact of the Spatial Plan on each suburb was published at the start of the consultation and I had to force its release by way of LGOIMA request (<https://fyi.org.nz/request/13552-ica-request-for-information-supporting-the-proposed-spatial-plan#incoming-51660>). Even so, the information released does **not** comply with the National Urban Policy Statement that specifies information on changes must be provided for each location and some areas, such as Johnsonville, have multiple impacted locations.

The policies and the maps are inconsistent – i.e., they frequently contradict each other. Housing changes are shown outside impacted areas in some suburbs while large areas inside impacted areas do not change in other suburbs. In Johnsonville, significant areas outside the suburban centre zone are identified on the map for Type 5 (8 Storey) housing even though the stated Spatial Plan rule is such housing is to be located within the suburban centre. The same applies to Type 4b housing that is outside the Spatial Plan 10 minute walkable catchment even though the stated Spatial Plan rule is to such housing to be within the catchment area.

Kelburn is excluded from consideration of Medium Density Housing even though it is really an Inner Suburb within easy walkable access to the CBD and to Victoria University which is where many living in Kelburn will be travelling for study or work.

The central and inner city suburbs, where more people aspire to live, have a much lower share of intensification than they should. Outer suburbs to the south and east of Wellington also have a much lower level of population growth with western and, especially, northern suburbs bearing the brunt of the impact from the Spatial Plan. All the suburbs of the city should share population growth, with a focus on building affordable housing where it's most needed, and to build the housing types that more people will want to buy.

Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

The Spatial Plan specifically excludes consideration of adding more land that could be developed for Greenfield housing. The WCC must consider all options to address this housing crisis and provide affordable housing to our city.

City and Inner Suburbs are much more accessible to a range of services and this is reflected in lower car usage compared to the outer suburbs to the west and north. It is these suburbs that are more attractive to city residents and so these should be developed first.

The experience of Johnsonville shows that unfavourable areas will not support significant levels of quality residential development even if such development is permitted under the District Plan. The Spatial Plan should cater for residential growth in phases rather than the wholesale set of zoning changes proposed under this plan. A smaller set of zones across the city should be considered with success in some areas leading to expanded zones.

To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs.

The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

- **Strongly Agree** – I want less “character” protection, while preserving “heritage”

The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

- **Agree**

The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

- **Strongly Agree**

There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

- **Disagree – New development should be encouraged to create a modern form that is primarily efficient and liveable**

The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

- **Agree**

There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

- **Agree - There should be more and larger city and Inner Suburb new developments to cope with growing population.**

Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? [View](#)

Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

- **Strongly Agree**

Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

- **Strongly Agree**

Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statements: [View](#)

The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

- **Strongly - Agree, providing public transport can be improved to service this intensification.**

We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula. This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park. This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood centre.

Do you support the idea of a community planning process for the following areas:

Te Motu Kairangi/Miramar Peninsula

- **Yes**

Strathmore Park

- **Yes**

If you answered yes, to the two questions above please respond to the following questions:

What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

- **Affordable housing**

What should the plan for regenerating Strathmore Park focus on or cover?

- **Affordable housing**

Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces? [View](#)

- **Disagree** - WCC is not doing enough to protect our natural environment. Parks around Johnsonville are overrun with noxious weeds, and Johnsonville open spaces are constantly being compromised (e.g. converted into car parks, etc). Our precious open spaces need a higher level of protection from WCC.

Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

- **Yes**

If you answered yes to the question above, what types of assistance would help landowners?

Provide advice on protecting natural biodiversity and combating pests

- Financial assistance
- Advice and guidance
- Planting
- Weed and pest control

Other (please specify)

Are there any final comments you wish to include in your submission?
If so, please provide your comments below.

The Spatial Plan is missing important information on the future capacity requirements, such as increased capacity for education, recreation and employment. There is no information on where and how building affordable housing will be made possible. This is not a Spatial Plan; it is just a zoning plan.

One notable example of WCC disconnected planning is the Let's Get Wellington Moving plan for a \$2 billion rapid transport line to Wellington South and East which, under the Spatial Plan, are the areas to have the lowest population growth. The WCC has no plan to build Rapid Transport to high growth suburbs such as Karori or Johnsonville.

The WCC has long targeted Johnsonville as a good place for large scale residential development which is dense. Compared to most other suburbs, Johnsonville is actually a poor location for people who need to access the city for work or

entertainment. It is a location where access usually requires a car and this is reflected in the highest car usage in Wellington City. Wishful thinking by planners will not change facts and the fact is that Johnsonville is not where large numbers of young or old want to live ... it is a good family suburb but families want low density housing, not the high density housing proposed for Johnsonville.

This "Spatial Plan" from the WCC represents an unsustainable change to the WCC Urban Development Strategy. This plan puts a disproportionate burden of new residential development on Western and especially Northern outer suburbs which are the least "efficient" places for sustainability and a compact city. This plan puts an unsustainable and unfair number of people into Johnsonville when there are better alternative areas for future Wellingtonians to live.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15545](#)

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Alison Kuiper

Suburb: Thorndon

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Neutral

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

The number of additional people is speculative and needs reconsideration.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

Character and heritage, walkability, space and light, lack of tall buildings creating wind tunnels, variety of colour through paint etc.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Commercial activity (retail, cafes, local businesses), Infrastructure (stormwater, water supply, wastewater), Walkability within the centre

Other: access to library

8. What amenities would you want to see around future mass rapid transit stops?

Landscaped spaces/plantings, Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Neutral

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Cafes etc

Parks and public spaces for walking

What amenities or facilities were missing or could have been improved?

Library access

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

I like its vision

2. What would you change or improve?

To see the vision carried out without developers having too much influence

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

Avoidance of wind tunnels created by too tall buildings which also cut out sunlight. Would anyone enjoy living in a 10 story building in Te Aro with other buildings of the same height adjacent?

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Agree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Neutral

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Agree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Neutral

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Not sure

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Strongly Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Weed and pest control

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? Yes

Quality urban design

The preparation of a Future Development Strategy is an essential precursor to the Draft District Plan. There is agreement that housing is needed and that it should be affordable. This must be considered in the context of what makes Wellington a liveable city for all residents including those in new housing.

A liveable city is one which is built with awareness of human scale so that it is a pleasant place to live in:

The physical characteristics that contribute to the liveability of cities include land use, built form, quality and conservation of public spaces and natural environments, efficiency of transport networks, accessibility to work, education, health and community services and social and recreational opportunities.

https://www.infrastructure.gov.au/infrastructure/pab/soac/files/2012_08_INFRA1360_MCU_SOAC_CHAPTER_5_WEB_FA.pdf

I concur with the call for the pausing of the Draft Spatial Plan so that there can first be closer consideration

1. of the amount of housing needed
2. where that housing can best be located
3. what constitutes quality urban design for Wellington
4. and how the quality of the design and housing can best be enabled and protected.

1. Quantity of housing required

The figures quoted are at the top end of the estimates and do not take into account trends to more working from home, the government's announcement of moving hubs outside the city and the need for planning to be done in conjunction with the adjacent areas of Petone, Lower and Upper Hutt., and Porirua

2. Location

Existing spaces within the city and environs include commercial properties available for conversion into housing and areas such as that around Wellington Hospital where housing is a better use of space than car yards or light industry

3. Quality Urban Design

The best communities are those which are mixed in ages and family types, so Wellington needs to avoid having only, for example, apartments which are suitable for single or couple occupancy, or only those which suit families or groups. Regardless of who the housing is for it must be comfortable in terms

- of light and
- of energy use
- ease of access and
- with easy access to green spaces.

These attributes must be required so that they cannot be ignored by developers.

The importance of natural light cannot be overestimated. Regulations are required to ensure that natural light is guaranteed in every building.

Where I lived in Sydney developers built six story blocks of tiny apartments which were largely bought by overseas investors. They then built further blocks so that the windows of these looked directly into the rooms of the first at less than a metre's distance and totally blocking the access to sunlight.

The tall buildings intensified the effect of the wind tunnels around them affecting all the residents in the area. It was no longer pleasant to walk in the sunlight. It was now a matter of walking in the shade and wind.

Green spaces and the maintenance of the character and heritage of Wellington are also integral to the successful regeneration of the city. An attempt to move too quickly in implementing changes without consideration of the overall effect on the nature of the city and those who live in and love it for its varied characteristics will destroy its nature as a liveable city.

4. Enabling and protecting the quality of development

Wellingtonians must be assured that the new building that will take place will be sympathetic to its existing character. The buildings can be of modern design but must be well designed to protect the quality of life of those who live here.

Rezoning primarily for building height goes nowhere near these crucial qualities of liveable urban spaces. The Plan places no constraints on developers other than the height to which they must build.

Care is required in planning for more residents in Wellington. That planning must not proceed without thorough consideration of how the changes in the urban landscape can improve the lives of the residents in the new housing and all the citizens of this city. Ensuring that light and space and an environment that enhances sociability are outcomes that cannot be left to developers.

Matters of liveability need to be addressed early within planning processes so as to reconcile the imperatives of sustainable development. These imperatives can obtain legitimacy if they are explored and integrated within the participatory planning process.

<https://www.crcresearch.org/case-studies/case-studies-sustainable-infrastructure/land-use-planning/what-makes-a-city-liveable>

Therefore, before the Draft Spatial Plan is adopted and implemented fuller consideration of a Future Development Strategy is required to ensure that Wellington is a liveable city for all its residents.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 14393

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Koenraad Kuiper

Suburb: Thorndon

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Neutral

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Neutral

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Neutral

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Neutral

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

I do not agree with the premis.

Why 80,000?

Where are they coming from?

I disagree with the extra load for the inner city. Some of this is OK but some is not. I particularly think that the attitude taken to character areas is mistaken. Once you change character areas to bland mid-rise apartment areas you no longer have what makes Wellington unique. I have seen what is done in inner Sydney. I have lived there for 6 years recently. It is not pretty.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

They are what makes Wellington special, it's look and feel, it's visual identity.

The proposal for where I live in west (upper) Thorndon would create an intermittent patchwork of a few streets of heritage housing and then a few streets of modern mid-rise housing. This will change the character of the strip of housing from Glenmore Street to Wadestown Road into an incoherent alternating mess. I have seen this done in inner city suburbs like Erskineville in Sydney. It isn't pretty but it does house more people if that is all that is wanted. It also leaves the new housing look at feel in the hands of the developers.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Infrastructure (stormwater, water supply, wastewater), Walkability within the centre, Easy walking distance to the centre

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Landscaped spaces/plantings, Cafes and restaurants

Other: In West Thorndon there will be no mass transit so these questions do not apply to this area.

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Not sure

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Just being able to walk. There are few other amenities. Not even a public toilet (if you walk for long in West Thorndon).

What amenities or facilities were missing or could have been improved?

There is no green space other than the town belt above and the botanical gardens at the southern end of West Thorndon but they suffice. (There is a toilet in the gardens, so plan your walk)

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

It gets you thinking about planners and developers and the way in which developers benefit from rezoning. It gets you to follow the money. Who benefits from rezoning? How does the Council which does the rezoning

benefit in terms of great numbers of rate p

2. What would you change or improve?

More care needs to be taken to take an overview of the city as a place to live. The buzz words associated with the plan are all very well but they don't really have any purchase on what might happen.

3. If inner Wellington becomes a place dominated by high rise and mid rise apartments with mainly young people and maybe mainly renters, will Courteney place on a Friday and Saturday night be even more flooded with young people? Will families be driven out of the inner city?
4. More care needs to be taken of the visual appearance of the city. Think of San Francisco with its heritage housing and Los Angeles without. Think of knocking down St Gerards. These are just as significant as squeezing more people into the inner city into the same buildings as you would find in inner suburbs of Sydney and Melbourne.

5. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

Yes. What effect does rezoning have on developers? Nothing is really said in detail on the how of the plan other than there will be rezoning. What happens after the rezoning? Once a developer owns a plot of land how is the Council to control the look and feel of what gets built? Regulatory agencies in Australia and NZ are very bad at this. European local authorities are better but it is always difficult since the developer owns the property.

6. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

Is density supreme?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

Can something coherent be done with Strathmore park?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

No

11. If you answered yes to the question above, what types of assistance would help landowners?

Other: In West Thorndon there will be no mass transit so these questions do not apply to this area.

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

If this plan goes ahead, Wellington will be irrevocably changed and not necessarily for the better since its visual identity will be altered to a more bland, international look. Families will be driven out of the inner city to dormitory areas. Owner occupiers will be replaced by renters. The sense of belonging and involvement is less for such inhabitants. Again the inner west suburbs in Sydney will provide a clear example.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

We want to hear your views on Our City Tomorrow (the Draft Spatial Plan).

Tell us what you think by answering these questions below

You can post this form to us (no stamp needed) or email this form to: planningforgrowth@wcc.govt.nz

You can also answer these questions online at:

planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form

Make a submission by **Monday 5 October 2020 at 5pm.**

Privacy statement - what we do with your personal information

View our full privacy statement online: planningforgrowth.wellington.govt.nz/privacy-statement

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the Resource Management Act.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

View Our City Tomorrow (the Draft Spatial Plan) online

planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan

Mobile and accessible version planningforgrowth.wellington.govt.nz > Draft Spatial Plan >

Our City Tomorrow: A Draft Spatial Plan for Wellington City (mobile and accessible version)

Downloadable PDF planningforgrowth.wellington.govt.nz > Draft Spatial Plan >

Summary of Our City Tomorrow: A Draft Spatial Plan for Wellington City (PDF)

Section 1 - your details *mandatory field

| | | | | |
|---|---|--------------------------------|--------------------------------|---------------------------------------|
| Your name (first and last)*: | Bernard O'STAUGHNESSY | | | |
| Your email*: | [REDACTED] | | | |
| Postal address*: | [REDACTED] | Miramuir Wellington 6022 | | |
| Suburb: | Miramuir | | | |
| Phone number: | [REDACTED] | Txt only | | |
| Age range: | <input type="checkbox"/> Under 18 | <input type="checkbox"/> 25-34 | <input type="checkbox"/> 45-54 | <input type="checkbox"/> 65-74 |
| <i>NOT relevant</i> | <input type="checkbox"/> 18-24 | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 55-64 | <input type="checkbox"/> 75 and older |
| Household: | [REDACTED] | | | |
| Preferred method of contact: | <input checked="" type="checkbox"/> Email | <input type="checkbox"/> Post | | |
| <input type="checkbox"/> You would like to sign up to our email newsletter and receive news and updates regarding Planning for Growth | | | | |
| You are making this submission: | | | | |
| <input checked="" type="checkbox"/> as an individual | | | | |
| <input type="checkbox"/> on behalf of an organisation. Your organisation's name: _____ | | | | |

Section 2 - compulsory questions

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|--------------------------|-------------------------------------|---|-------------------------------------|-------------------------------------|--------------------------|
| 1. To what extent do you agree or disagree with what is proposed with intensification in the central city?* (Refer to Central City fact sheet number 02) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. To what extent do you agree or disagree with what is proposed with intensification in the inner suburbs?* (Refer to Inner Suburbs fact sheet number 03) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. To what extent do you agree or disagree with what is proposed with intensification in the outer suburbs?* (Refer to Outer Suburbs fact sheet number 04) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs, and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?* | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?* | just in CBD | | | | | |
| 5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?* (Refer to Character Areas fact sheet number 05) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about character in these suburbs is important to you?* (Refer to Character Areas fact sheet number 05) | old wooden style | | | | | |
| 7. What amenities would you want to help create a vibrant suburban centre?* | | | | | | |
| Please pick your top 5 from the options below. | | | | | | |
| <input type="checkbox"/> Proximity to parks and open space | 3 | | <input checked="" type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) | | | |
| <input checked="" type="checkbox"/> Access to public transport <i>no bus hubs</i> | | | <input type="checkbox"/> Social services and community facilities | | | |
| <input type="checkbox"/> Public/shared spaces | | | <input type="checkbox"/> Medical facilities/centres | | | |
| <input type="checkbox"/> Commercial activity (retail, cafes, local businesses) | | | <input type="checkbox"/> Access to cycleways/routes | | | |
| <input type="checkbox"/> Employment opportunities | | | <input type="checkbox"/> Walkability within the centre | | | |
| <input checked="" type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) <i>Libraries</i> | | | <input type="checkbox"/> Easy walking distance to the centre | | | |
| | | | <input type="checkbox"/> Other (please specify) | | | |
| | | | ① <input checked="" type="checkbox"/> Less booze outlets | | | |
| | | | ② <input checked="" type="checkbox"/> Less Pokies | | | |
| 8. What amenities would you want to see around future mass rapid transit stops?* | | | | | | |
| Please pick your top 5 from the options below. | | | | | | |
| <input type="checkbox"/> Public shared spaces | ① | | <input type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) | | | |
| <input type="checkbox"/> Landscaped spaces/plantings | | | <input type="checkbox"/> Child care | | | |
| <input checked="" type="checkbox"/> Parks and playgrounds | | | ⑤ <input type="checkbox"/> Medical facilities/centres | | | |
| <input checked="" type="checkbox"/> Shops and businesses | | | ② <input type="checkbox"/> Bicycle parking | | | |
| <input type="checkbox"/> Cafes and restaurants | | | <input type="checkbox"/> Other (please specify) | | | |
| <input type="checkbox"/> New housing | | | | | | |

| | Strongly Agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>9. To what extent do you agree or disagree with the following statement?*</p> <p><i>Our City Tomorrow</i> outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be compact, resilient, inclusive and connected, vibrant and prosperous, and greener.</p> <p>(Refer to <i>Our City Tomorrow</i> fact sheet number 01)</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighborhood in a different way.</p> <p>What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?*</p> <p>1) PARK 2) Sea side</p> <p>What amenities or facilities were missing or could have been improved?*</p> <p>Library</p> | | | | | | |

Section 3 - non-compulsory questions

| <p>1. What do you like about <i>Our City Tomorrow: A Draft Spatial Plan for Wellington City</i>?</p> <p>Bits & pieces.</p> | | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>2. What would you change or improve?</p> <p>Sort out transport issues first</p> | | | | | | |
| <p>3. Is there anything that needs to be considered as we plan for the future that is not provided for in <i>Our City Tomorrow</i>?</p> <p>a) Sea walls b) retreat from the sea c) climate change d) Next covid 19!</p> | | | | | | |
| <p>4. To what extent do you agree or disagree with the following statements considering what is proposed for the inner suburbs:</p> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through retention of a general character area to ensure that new development respects the local streetscape and is well-designed. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations where streetscape character is substantially intact. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? View this section of <i>Our City Tomorrow (the Draft Spatial Plan)</i> : planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, greener city. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement? View this section of <i>Our City Tomorrow (the Draft Spatial Plan)</i> : planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. We also want to understand the public appetite for community planning processes in specific areas, such as: Te Motu Kairangi/Miramar Peninsula This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route. Strathmore Park This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center. | | | | | | |
| 8. Do you support with the idea of a community planning process for the following areas? 8.1.1 Te Motu Kairangi/Miramar Peninsula <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure 8.1.2 Strathmore Park <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure | | | | | | |

9. If you answered yes, to the two questions above please respond to the following questions:

9.1.1 What should the **Te Motu Kairangi/Miramar Peninsula Framework** focus on or cover?

• Consultation with real people
(not Peter or Ian)

9.1.2 What should the **plan for regenerating Strathmore Park** focus on or cover?

Do what they did in Whanganui & Gisborne.

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 10. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces? View this section of Our City Tomorrow (the Draft Spatial Plan): planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Natural & Open Space | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

11. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes No Not sure *lets have the discussion / debate*

12. If you answered yes, to the question above what types of assistance would help landowners?

Financial assistance Planting Other (please specify) _____
 Advice and guidance Weed and pest control

13. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Yes. have plenty to say at oral hearings.

14. Have you provided an attached document?

Yes Not yet.

1011012

1st fold here - fasten here once folded

2nd fold here

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke



FREEPOST 2199

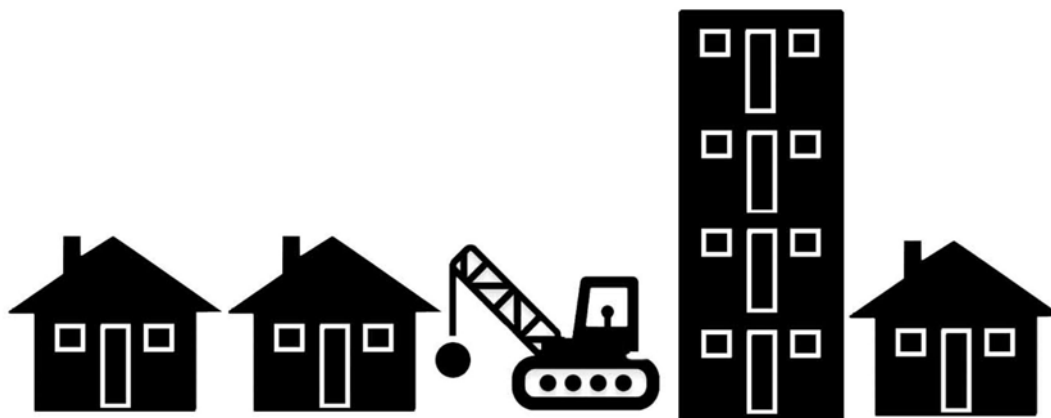
309/1039

Wellington City Council

PO Box 2199

Wellington 6140





3 October 2020

Mt Cook Mobilised (MCM)

Submission on Wellington City Council's Draft Spatial Plan Proposals

MCM represents residents and businesses in Mt Cook. About 6800 people live in our suburb. Much of the suburb currently has "character protection" (need resource consent to demolish a pre-1930 building) and a height limit of 3 storeys for new buildings. Mt Cook is already a high population density suburb, and one of the fastest growing outside the Central Business District (CBD).

We strongly oppose the removal of the existing character protection from more than half the currently protected area in Mt Cook. This would result from ending the constraint on demolition of pre-1930 housing and increasing the height restriction, as proposed in the Draft Spatial Plan (DSP). We regard the proposal to retain vague general character controls on new developments in the parts of Mt Cook outside the remaining full protection sub-areas as effectively meaningless.

Our submission focuses on these issues, and on the need for appropriate transition zones between the extended CBD zone (6+ storeys) and the Mt Cook character areas.

Other than passing references this submission does not deal with character protection for specific areas (eg, Nairn, Thompson and upper Hankey Streets), small groups of houses (eg, the need to keep full character protection for Myrtle Cres, Hargreaves St and parts of Rolleston St), or individual properties that warrant specific character or heritage protection. There is widespread support among Mt Cook residents for these areas to get or retain full protection. These more specific issues are covered in individual submissions by Mt Cook residents.

Part 1: Character Protection

Character protection is valuable to Wellington as a whole, economically and socially, as well as to the people living in inner suburbs. The maintenance of this long-established urban environment

creates and accommodates a sense of community and diversity that sits at the heart of what makes Wellington a great place to live. The proposals in the DSP risk destroying this.

The DSP argues that changes to character protection and maximum heights are needed to enable the development of housing for future population growth. This argument is flawed. The changes will not achieve the objectives of the DSP and the National Policy Statement on Urban Development (NPS). And if the proposed changes go ahead, it would take only three decades to wreck 150 years of history.

Excessive growth forecasts

The calculations of the number of dwellings needed in the inner suburbs made in the "Wellington Regional Housing and Business Development Capacity Assessment" (the Capacity Assessment) suggest total demand for these six suburbs will amount to between 4,100 and 5,400 dwellings over the 30 years to 2047.

The population forecasts underlying the dwelling projections used in the DSP are inflated as required under the NPS at paragraph 3.22, with the two supporting population projections being a high growth scenario and a medium forecast which then had a 15% loading added. The argument in the NPS for using higher growth forecasts is that it will ensure "choice and competitiveness" in the available housing. This argument is nonsense, as explained in the next section.

The authors of the Capacity Assessment themselves say that the actual demand for housing will revert to the medium forecast (the most likely actual growth rate) before the 15% loading is added. Using this forecast (without the 15% increase) implies a real need for about 3700 dwellings in the inner suburbs over the next 30 years.

Further, the Capacity Assessment also states that about 2500 dwellings will be built anyway by 2047 in the inner suburbs under the existing District Plan rules. So the real requirement for extra dwellings, over what will happen anyway, is about 1200 dwellings spread across all six inner city suburbs. Say 200 dwelling units per suburb spread over 30 years (seven units per year), and hence a total of only 50 or so additional buildings (terrace housing?) that would need to be accommodated in Mt Cook in that 30 year period.

This volume of additional housing does not warrant removal of character protection from half the suburb. The extra accommodation that is actually required, over and above what will be built anyway, could be achieved by a concerted drive to renovate and alter existing properties to create more dwelling units in a manner sympathetic to the existing character. Exploring incentives and other means to achieve this approach would be preferable to the removal of the existing character protection. Densification of the lower Adelaide Road transport corridor (between the Basin Reserve and John Street) would also meet all or much of the anticipated future demand expected in Mt Cook.

Affordable housing?

The argument used in the NPS and hence implicitly in the DSP for the "buffer" resulting from using higher population growth scenarios is that this will achieve "choice and competitiveness" (ie better affordability) in housing, due to the emergence of an oversupply of dwellings.

This ignores the reality that owners and developers won't build dwellings that are not economic, ie that don't achieve sale prices or rentals that cover the increasing costs of land and building (ever stronger building codes), insurance (higher earthquake premiums), rates (future infrastructure costs), legal and corporate ownership costs, and so on.

Making the District Plan less restrictive will do little to change the reality of unaffordability. It might on paper suggest more dwellings could be built, but the solutions needed to actually get them built and to get affordable accommodation lie elsewhere.

We argue that the DSP's proposed changes to character protection are neither necessary nor sufficient to meet the DSP's objectives. The extra buildings that are really required can be achieved with some ingenuity and effective incentives, without removing the existing character protection. Nor will an increase in the supply of affordable housing simply result from allowing more dwelling units to be built. If the relevant costs remain above affordability thresholds, affordable new housing will simply not happen.

Other challenges to the DSP proposals are set out in the following three sections.

No tower blocks in Mt Cook

A stronger focus on renovation and better use of existing housing stock would be far better than pepper-potting 4- or 6-storey tower blocks through the parts of the suburb that don't retain full character protection. With some exceptions, the land area of most sites in Mt Cook is quite small and often steep, so unless there is aggregation of sites, only two apartments per level would be typically achieved in most new builds. Thus, quite a number of new blocks would be required even to achieve the lower number of dwellings we estimate as necessary. Also, each new build involves the removal of one or two existing dwelling units, often with multiple flatmates, so it takes more new builds to get a substantial net gain. In addition, new builds are likely to be less affordable than the previous dwellings.

The loss of sunshine and privacy when a 4- or 6-storey block is built on an adjacent property can be a major source of distress. A Motu study in 2017 ("Valuing Sunshine" Motu Working Paper 17-13) found that the loss of each hour's sunshine reduces the value of a property by 2.4%. And an older case study by the Tasman District Council for the Ministry for the Environment (Technical Report 66 on Urban Amenity) found that sunshine in the house is valued as important or very important by 98% of residents.

Given the small size of many inner urban sites, revised recession plane rules and/or exemptions from them are likely if tower blocks are allowed. The resulting increase in shade from even 4-storey buildings, particularly in winter, is likely to reduce the quality (less light and warmth, more dampness) of adjacent houses. It would be ironic if a misguided push for more affordable but inappropriate tower blocks caused the existing housing stock to become less healthy.

Apartment blocks of four or more storeys high need more concrete than lower buildings built with wood. Staying with lower building height restrictions for new builds, and emphasising better use of existing structures with their embedded carbon, will help Wellington achieve the Council's zero carbon goals.

Future residential location

The underlying assumptions in the DSP may become less valid. People may be able and wish to live away from the CBD and inner suburbs, without requiring the same degree of commuting to town to work and shop.

Ongoing changes in the nature and technology used in people's work, and more recently the pandemic, have shown that many people can do much of their work from home, and this may affect people's decisions on where to reside. In turn, their places of work and associated businesses such as cafes may tend to follow them away from the CBD.

These changes themselves are reducing demands for transport, and hence help to achieve a reduction in emissions etc. Is too much weight being placed on changes to the District Plan to achieve static views on the appropriate location of housing, when other approaches such as support for decentralised locations for work opportunities, may be more effective?

In addition, the expected improvements in Wellington's public transport and cycle/pedestrian systems and better car-sharing schemes should also reduce the need to live in or close to the central city. How will developments in the wider Wellington region affect people's decisions on where to live? And there is some risk that enhancements to three-waters infrastructure in the older parts of Wellington will not be sufficient to sustain the anticipated residential growth.

A Colorado State University study suggests international experience from the Covid pandemic indicates that higher density housing raises the risks of infection from such epidemics. If correct, this further strengthens the argument against greater density of housing. If public health requirements to reduce such risks lead to enhanced codes for the design of apartment blocks, construction and operational costs for this type of accommodation may increase further.

All of these factors need to be considered much more explicitly in preparing the Final Spatial Plan.

Open space controls

The current District Plan requires that new buildings in much of Mt Cook not take more than 50% of the area on a site, though owners and developers can apply for exemption from this.

The DSP suggests (but with no specific details) that this control may be eased so that buildings can have a larger footprint as of right. One reason is that the Council would no longer require sites to have on-site parking available.

The DSP has fine words about the need for open space and green areas, but no specific proposals are put forward on how this would be achieved. Mt Cook is not well endowed with small green open public spaces in the residential area (the town belt on the western boundary of the suburb is great but is not easily accessible for many people, and the town belt on our east is completely blocked by the two colleges and Government House). It is therefore important for Mt Cook that adequate open space still be required on sites for new builds and major renovations, and to ensure that sunlight continues to get to existing houses.

Part 2: Transition Zones with the Central City

Mt Cook borders closely with the central city along Webb Street/Pukeahu Park, and it also includes the proposed Adelaide Road high density zone. There needs to be much more careful consideration given to the indicative height limits for these contiguous areas than is presently contained in the DSP. The objective should be to get a better step-down transition from the 10-plus storey tower blocks in the CBD through to the areas in Mt Cook still proposed for character protection.

There are several issues here. For both Mt Cook residents in the northern end of Mt Cook and for people living in the CBD, the open view lines from their homes towards both the city and the Carillon and Pukeahu Park are important. The proposals to have buildings higher than 6 storeys south of SH 1 and Webb St will cut across these sight lines. And in the reverse direction, the views from this area and from the city of the character housing on the Bidwill St ridge will be at risk. We urge that height limits be stepped down for all sections south of Webb St, and that MCM and local residents be involved in discussions on this.

Within this area south of Webb St, the DSP shows a large area as being "Type 4b", with prospective height limits of more than 6 storeys. This seems to take no account of two features: the general topography of this area, and the sharp interface the Type 4b area would have with the two character areas in Hankey St (Type 3, 3-4 storeys) and Bidwill St (Type 2, 3 storeys). Not only is there an unacceptable abrupt transition in building heights, much of the area proposed for towers of over 6 storeys is considerably higher than the adjacent lower-height zones. This Type 4b area climbs sharply right up the ridge to Nairn St Park above Arlington and lower Hankey Streets, and above Anderson Tce and parts of Bidwill St. It also includes the higher sections of Nairn and Thompson Streets. This proposal, which would see 6+ storey towers up on this high ground, is totally inappropriate.

This is especially pertinent for the Heritage-listed Anderson House (now owned by Te Kohanga Reo Trust) in upper Hankey St. It would be a dreadful shame if this outstanding property, while itself protected by its listing, was surrounded by apartment towers.

We accept the general principle of high density residential development along the Adelaide Rd transport spine. But the proposal to have the eastern side of Myrtle Crescent (which in fact is a strong candidate for full character protection) as being up to 6 storeys high and to have the section of King St immediately behind it treated as if it is part of the CBD is much too sharp a transition, when the opposite side of Myrtle Cres is proposed as being 3-4 storeys.

These issues are examples of a general gap in the DSP - the lack of any proposition that clear and comprehensive guidelines for the transition between zones with multi-storey building heights and those with constrained height limits will be needed. Such guidelines should emphasise the need for these transitions to be gradual, include consideration of both topography and two-directional view lines, and include step-down transition zones within the CBD as well as in the areas contiguous to it.

Conclusion

The DSP has a one-dimensional focus on providing accommodation for Wellington's future population growth. Other critical dimensions such as transport, water infrastructure, business development, open-space planning, climate change policies, regional development planning and so on may be under consideration. They are possibly implicit in the DSP, but this bigger context and its impact on the DSP's proposals are not clear and transparent. A broader Future Development Strategy, as envisaged under the NPS, should have been completed first to provide this wider picture for Wellington's development, before the DSP and its single focus on housing emerged.

MCM is totally opposed to the blanket removal of character protection from half of our suburb.

This proposal is based on an overstatement of the requirements for future accommodation. Removal of character protection will mean the gradual loss of the spirit of our community and could impact on the quality of our existing housing. There are better options for meeting the future needs for accommodation in Mt Cook and other inner-city suburbs.

Guidelines for effective transition zones between areas in the CBD zoned for multi-storey buildings and contiguous character protection areas in Mt Cook should be developed before decisions on building heights progress further. These should be developed in consultation with MCM and affected/interested residents.

MCM asks that we have an opportunity to discuss our views with WCC councillors and officials before preparation of the Final Spatial Plan begins.

We understand that no further public hearings are proposed at this next stage, but if this changes, we ask that MCM have the opportunity to present its views at any hearings.

References:

- Draft Spatial Plan (DSP) 2020 - Wellington City Council
- National Policy Statement on Urban Development (NPS) 2020 - Ministry for the Environment

- Wellington Regional Housing and Business Development Capacity Assessment (the Capacity Assessment) - Wellington City Council
- "Valuing Sunshine", Motu Working Paper 17-13, 2017
- Technical Report 66 on Urban Amenity, Ministry for the Environment (Tasman District Council Case Study at p. 105)
- Colorado State University - A lesson from the COVID-19 pandemic on the perils of density

PFG Spatial Plan submission – J Coyle**1. To what extent do you agree or disagree with what is proposed with intensification in the Central City.**

Agree

(justification)

I think we need to avoid low rise developments occurring in the city and need to stimulate the conversion of low rise commercial buildings and brownfield sites, while also ensuring that the cities commercial premises are fit for purpose and are affordable for the cities businesses and enterprises. Promotion and support of small business, enterprise, arts, and new forms of business operation continues to be a key strategic driver for Wellington City.

We also need to be watchful of earthquake design and take a lead from structural engineers about height limits. For example CHCH has limits of 7 stories in the urban centre.

Proposals for green space are not existent in this spatial plan for the central city.

I would like to acknowledge the impact and stress that this will have on residents in Thorndon currently zoned inner residential that are changing to Central City zone.

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs.

disagree

(justification)

I think the Do Maximum approach that has been drawn should reduce to a Do Minimum or Do intermediate approach due to the risks of poor urban design outcomes. I would support a phased approach to development and zoning; as a starting point the heights directly adjacent to the proposed light rail in Newtown should change from the current 4 story limit to a 6 story limit. The risk here is however similar to the central city, WCC should maintain that commercial premises are fit for purpose and affordable for shops, enterprises, restaurants and arts industries which are part of Newtown's celebrated brand.

WCC should use the Boffa Miskell drawings of character and propose these areas as the sub character areas. The spatial plan should avoid mixing building typologies in these areas, ie 6 story buildings adjacent to 1 or 2 story buildings. Also look to reduce building heights proposed for type 2 and type 3 housing, which are unspecified in the NPS - UD.

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs.

Agree

(Justification)

In the northern suburbs along the railway line, there should absolutely be provision for housing along this key and existing infrastructure.

In all suburbs I would encourage WCC to look at the adverse effects of mixing building typologies and look to reduce the height limits for Type 2 and Type 3 housing which are not specified by the NPS-UD.

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?

Agree

(Justification)

Council have done a good job at distribution of the proposed intensification and have stayed focused on public transport routes.

5. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

- I disagree with the Do Maximum approach from WCC regarding the distribution of Type 4 housing in Newtown and Berhampore. WCC have colour blocked large areas of Newtown and Berhampore.
- Please look at the plans drawn by Martin Hanley and Anna Kemble Welch, who have looked at an alternative solution which **over-achieves** the amount of housing required.
- M&A's proposed densification is focused on the suburban centre areas, and is adjacent to the *Let's get Wellington Moving* light rail routes proposed, as well as developing brownfield sites while also keeping the heritage shopfronts.
- I would go one step further and develop laneways in between heritage shop rear lots and new apartment buildings, in order to create more commercial edge.
- I would like to see special housing areas developed for social housing and tests for terrace housing
- I think Newtown should over achieve its targets, as it is a welcoming place and I would like to see the increased population here to support business and arts amenities. Some other suburbs may not be able to develop due to land conditions and risk of sea level rise.
- In all suburbs I would encourage WCC to look at the adverse effects of mixing building typologies and look to reduce the height limits for Type 2 and Type 3 housing which are not specified by the NPS-UD.

6. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs. *

Disagree

(Justification)

WCC should take the independent advice sought and received from Boffa Miskell and match the recommendations for special character areas.

7. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you? *

- WCC should take the independent advice received and match Boffa Miskell's recommendations for sub character areas. The NPS-UD provides a mechanism for exceptions to type 4 housing due to local considerations and heritage and WCC need to use what has been provided for them from an independent consultant.

- I feel WCC are driving their own agenda by reducing the size of the sub character areas from the Boffa Miskell advice, and I think this is poor consultation methodology and an inappropriate use of position.
- I think modern housing can be integrated in these areas but there should be a co-designed design guide or a co-designed procurement process for a design panel that recognises the scale and rhythm of existing housing and understands how to manage building typologies, sunlight access to all homes, and urban placemaking priorities.

8. What amenities would you want to help create a vibrant suburban centre? (please pick your top 5 from the options below) *

- Proximity to parks and open space
- Access to public transport
- Public/shared spaces
- Commercial activity (retail, cafes, local businesses)
- Employment opportunities
- Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.)
- Infrastructure (stormwater, water supply, wastewater)
- Social services and community facilities
- Medical facilities/centres
- Access to cycleways/routes
- Walkability within the centre
- Easy walking distance to the centre

Other (please specify)

- All of the above are important
- I would like to see increased Arts and culture amenities, low rental creative spaces (such as Bloom)
- I would like to see engagement with the Newtown Festival about how permanent festival infrastructure can play a role in everyday Newtown life. Such as weekly road closures, stages that are also buskers pitches and play structures.
- I would also want additional social housing in Newtown as it is a valued part of the community.
- I also think that we need some radical thinking and co-design about the future of amenities in the city due to Climate Change, remote working practice, the way we move, and what we are moving to.

9. What amenities would you want to see around future mass rapid transit stops? (please pick your top 5 from the options below) *

- Public shared spaces
- Landscaped spaces/plantings
- Parks and playgrounds
- Shops and businesses
- Cafes and restaurants
- New housing
- Community facilities (libraries, community spaces, social services, etc.)
- Child care
- Medical facilities/centres
- Bicycle parking

Other (please specify)

- All of the above are important
- I would like to see Increased Arts and culture amenities, low rental creative spaces (such as Bloom)
- I would like to see engagement with the Newtown Festival about how permanent festival infrastructure can play a role in everyday Newtown life. Such as weekly road closures, stages that are also buskers pitches and play structures.
- I would also want additional social housing in Newtown as it is a valued part of the community.
- I also think that we need some radical thinking and co-design about the future of amenities in the city due to Climate Change, remote working practice, the way we move, and what we are moving to.

10. To what extent do you agree or disagree with the following statement: Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener. *

The consultation for this project is very low tier in terms of international engagement frameworks; for something with such a large impact there should be an intensive co-design engagement process with both the community and key stakeholders. The consultation has followed the pattern of other WCC consultations in the last 10 years and has created division and polarisation of stakeholders which I think has resulted in poor quality discussion. The engagement should be bringing people together on a common goal and a vision for the city, and this blueprint does not achieve this.

I agree with all of the principles of the blueprint in their written form: **Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.**

What things in the plan do I support?

- Densification and increased numbers of dwellings of all suburbs in Wellington City for three reasons.
 - 1) The country needs a strong climate action plan and densification of cities and low reliance on personal motor vehicles should be a core strategy
 - 2) The country is a housing crisis and increased amounts of dwellings are needed to meet demand
 - 3) Increased population in Newtown is a good thing in order to support and grow amenities that contribute to placemaking such as events, cafes, shopping areas, markets, arts and culture and light industry.
- If it can be proved to be safe in earthquakes, I support increasing the height limits of the central city zone, however I do acknowledge the impact that this will have to existing residents in the Hobson St area of Thorndon, and suggest co - design engagement with stakeholders in those areas.
- I support WCC creating sub character areas where pre 1930's frontages are protected via a resource consent process
- I support removing the carparking requirement from new dwellings in the inner suburbs
- I support Newtown being flagged for a dedicated lane light rail or BRT, cycle lanes, and walking routes in the future and agree that some zoning should be changed in Newtown in response to this key infrastructure proposed.

What are the things in the plan that I don't support or think hold a lot of risk:

- Not enough green space is being proposed, which risks the failure of a key objective.
- This plan does not promote the low hanging fruit of existing houses being able to subdivide and create extra dwellings. At the moment this is incredibly expensive and not possible due to existing site coverage rules and dwelling limits.
- This plan promotes mixed building typologies for large areas of the city without phasing or staging, which will risk poor design control over urban scale and neighbour sunshading and will not achieve the key objective of density done well.
- There is a risk that having stand alone structures amongst 2 story housing, creates a poor use of land as buildings may have windows on all sides, and would always be a stand along high rise building. Creating terrace style housing which only has openings on two sides would be a superior use of land for high density.
- In this plan WCC take a do minimum approach to proposed sub character areas and the previously recognised historic areas of the inner suburbs are at risk of non-notified demolition. The NPS-UD respects the significance of character and heritage, and gives WCC a mechanism to grant exemptions to planning changes due to heritage. WCC engaged Boffa Miskell to map areas of significant character, this was completed and published. In Newtown WCC has reduced the area highlighted by Boffa Miskell by almost half and is therefore not fully utilising the mechanisms the government has created to protect areas of the city. We risk losing a sense of place and driving out residents that have contributed greatly to placemaking activities in Newtown and Berhampore in the last 40 years.
- There is a risk that WCC zone for too much housing and reduce commercial and light industry footprint in Newtown, therefore reducing the amenities that they are trying to connect people with.
- As with the experience of the failed growth spine developments, there is a risk that WCC infrastructure spend does not match the plan.
- There is a risk that a dedicated lane light rail or BRT transport route is not funded through Newtown to the airport, and the capacities of population and transport do not match. This will therefore increase the number of motor vehicles in the suburb without parking provisions.
- There is a risk that you alienate existing owner occupiers, who stop investing in the houses, and you miss the opportunity for owner developer projects to improve densification, such as adding additional dwellings or tiny homes

11. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighborhood in a different way. What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

I think that we need some radical thinking and co-design about the future of amenities in the city due to Climate Change, remote working practice, the way we move, and what we are moving to.

12. What amenities or facilities were missing or could have been improved? *

- I would like to see more Arts and culture amenities and low rental creative spaces (such as Bloom)
- I would like to see engagement with the Newtown Festival about how permanent festival infrastructure can play a role in everyday Newtown life. Such as weekly road closures, stages that are also buskers pitches and play structures.

- I would also want additional social housing in Newtown as it is a valued part of the community.
- I also think that we need some radical thinking and co-design about the future of amenities in the city due to Climate Change, remote working practice, the way we move, and what we are moving to.

COMMENTS ON OUR CITY TOMORROW: A DRAFT SPATIAL PLAN

To: planningforgrowth@wcc.govt.nz

Comments provided on behalf of: Stride Investment Management Limited on behalf of Stride Property Limited and the Diversified NZ Property Trust

Address: c/- MinterEllisonRuddWatts
PO Box 2793
Wellington 6140
Attention: Bianca Tree/Clare Sinnott

Telephone No: [REDACTED]

Email: [REDACTED]

Introduction

1. On 10 August 2020, Wellington City Council (**Council**) released *Our City Tomorrow: A Draft Spatial Plan (Spatial Plan)* and invited comments on that draft plan.
2. This document provides comments on the Spatial Plan by Stride Investment Management Limited (**SIML**) on behalf of Stride Property Limited (**SPL**) and Diversified NZ Property Trust (**Diversified**). SIML is aware that Investore Property Limited (**Investore**) has also made a submission on the provisions of the Spatial Plan, including provisions of the Spatial Plan relating to Johnsonville, and supports Investore's submission.
3. SIML supports the aims underpinning the Spatial Plan, particularly the goals of:
 - (a) creating well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (**NPS-UD**));¹
 - (b) a compact city with a compact urban form:²

¹ National Policy Statement on Urban Development, 2020, Summary tab, Spatial Plan.

² Compact, Goals and Directions tab, Spatial Plan.

- (i) which is liveable, easily accessible and connected and makes efficient use of existing infrastructure, community facilities and transport links;
 - (ii) where public open space is safe, well-designed, enables a range of innovative and creative uses and meets the needs of diverse communities now and in the future; and
 - (iii) where there is long-term investment in infrastructure, community and recreation facilities and services to support future development in existing urban areas;
- (c) a vibrant and prosperous city in which: ³
- (i) metropolitan and town centres are revitalised to support their viability and stimulate adjoining residential growth and development; and
 - (ii) increased opportunities are available to stimulate further employment and business growth;
- (d) an inclusive and connected city with movement systems that support a compact urban form, transport network improvements and design which make getting around the city safer, healthier and more efficient;⁴ and
- (e) a greener city in which water management infrastructure and practices improve water quality across the city.⁵
4. SIML supports:
- (a) those goals (which are consistent with the objectives of the NPS-UD); and
 - (b) the recognition in the Spatial Plan of the need for:
 - (i) improvements to pedestrian connections to the main commercial and community areas in the Johnsonville metropolitan centre; and
 - (ii) investment in three waters and other infrastructure in Johnsonville to support growth opportunities.
5. SIML seeks amendments to the Spatial Plan to:

³ *Vibrant and Prosperous*, Goals and Directions tab, Spatial Plan.

⁴ *Inclusive and Connected*, Goals and Directions tab, Spatial Plan.

⁵ *Greener*, Goals and Directions tab, Spatial Plan.

- (a) consistently recognise Johnsonville as a metropolitan centre;
 - (b) allow development of up to 18 storeys at the Johnsonville Shopping Centre site;
 - (c) clarify the scope and intent of the density and 'proposed housing type' provisions in the Spatial Plan, including to clarify that a higher allowed building height does not necessarily mean that a site is suitable to be developed for mixed-use (or business) development;
 - (d) specifically refer to investigating double-tracking the Johnsonville railway line and improving the integration of the Johnsonville station with the metropolitan centre; and
 - (e) recognize the desirability of removing through traffic from Johnsonville Road to create a high street within the metropolitan centre.
6. We expand on these matters below. The specific amendments to the draft Spatial Plan that SIML is seeking are set out in **Appendix A** to this submission.
7. SIML would also appreciate the opportunity to be involved in the development of a place-based plan for managing growth and change in Johnsonville.⁶

About the Stride Property Group

8. SIML and SPL are part of the Stride Property Group of companies.
- (a) SIML is a specialist real estate investment manager which currently manages the property portfolios of SPL, Diversified and Investore.
 - (b) SPL manages one of New Zealand's largest diversified investment property portfolios, with a range of commercial office, retail and industrial properties.
9. Diversified is a property trust primarily managed by SIML, which owns \$485 million (as at 31 March 2019) of retail shopping centre property.
10. The Stride Property Group's investment strategy is to invest in a portfolio of places with 'enduring demand'. Places that attract the highest demand in all market conditions because they meet the needs of tenants, their staff, their visitors and their customers. The attributes of properties that have enduring demand vary depending on the sector

⁶ Tawa and Kilbirnie, *What is anticipated here?*, Outer Suburbs tab, Spatial Plan.

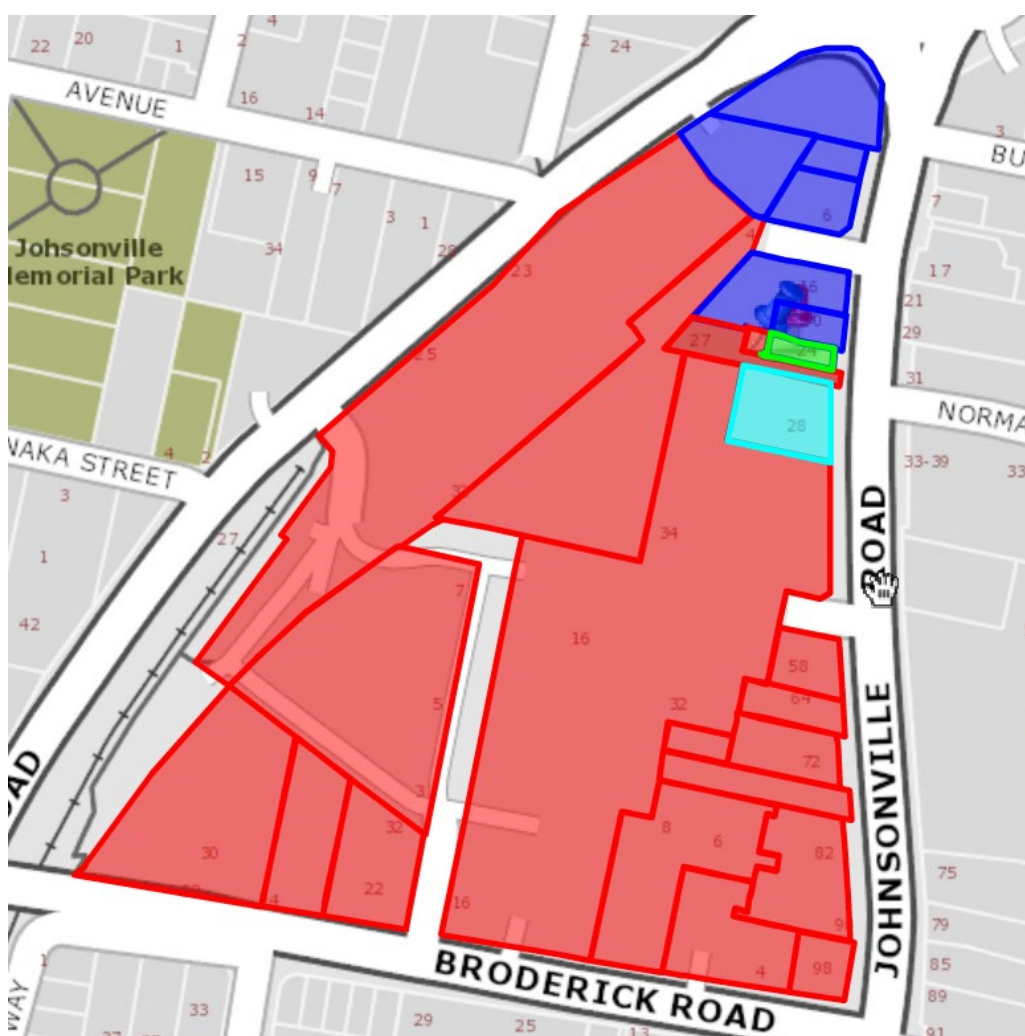
and the market but are a combination of accessibility, amenity, functionality and a value proposition that is compelling.

11. The Stride Property Group develops properties with a view to long-term ownership and, therefore, invests in its buildings to meet high quality and design standards.

The Johnsonville Shopping Centre

12. SPL and Diversified each own a 50% share in the land in Johnsonville coloured red on Figure 1 below which is occupied by the Johnsonville Shopping Centre.

Figure 1 – Land at Johnsonville owned by SPL and Diversified (coloured red)



13. Current tenants at the Johnsonville Shopping Centre include Countdown, Newbolds, Whitcoulls, Paper Plus, Toyworld, Specsavers, Hannahs, Life Pharmacy, Just Jeans, Super Liquor, EB Games, 2°, the Caci Clinic, Pizza Hutt, and the Westpac, BNZ, ANZ and ASB banks.

14. The Johnsonville Shopping Centre originally opened in 1969 as Wellington City's first shopping mall.
15. The Johnsonville Shopping Centre site is approximately 4 ha in area and occupies the majority of the block bounded by Johnsonville Road, Moorefield Road and Broderick Road.
16. While the shopping centre has been progressively developed over time, in 2017 resource consent was obtained for a redevelopment of the Johnsonville Shopping Centre (**2017 Consent**).
17. The redevelopment authorised by the 2017 Consent would include:
 - (a) 26,000m² of development including retail, cinema and commercial activities;
 - (b) 900 car parking spaces; and
 - (c) pedestrian linkages (including linkages connecting to bus stops and the Johnsonville railway platform) and road widening works.
18. However, SPL and Diversified are now preparing scheme plans for a mixed-use development at the Johnsonville Shopping Centre site at a far greater density and height than that authorised by the 2017 Consent.
19. Intensive mixed-use development at the Johnsonville Shopping Centre site is necessary to ensure that the redevelopment of the centre is commercially viable. The retail market has been disrupted in the last few years with increasing on-line sales (including New Zealand based on-line importers, and ease of access to international online market places). In response, shopping centres must become an 'experience' and 'destination' and include a range of entertainment, food and beverage offerings. To ensure the vitality of a centre it is also critical to provide a customer base by incorporating commercial and residential activities as part of the development.
20. This form and type of development is consistent with the direction in the NPS-UD for the density of urban form in metropolitan centres zones "to reflect demand for housing and business use in those locations".⁷
21. The planning benefits of metropolitan centres evolving into intensive centres that provide for retail, commercial and residential activities was also recognised and realised in the Auckland Unitary Plan review. The Auckland Unitary Plan zoned the ten

⁷ Policy 3(b) NPS-UD.

Auckland sub-regional centres⁸ as metropolitan centres and enabled a standard permitted height of up to 72.5 metres.

22. As a result of this zoning, a number of redevelopment projects have proceeded (or are proposed) which provide for commercial and/or residential development within these centres and, by revitalising the metropolitan centres, facilitate capital investment in the wider area.
- (a) For example, resource consent has recently been granted for a significant expansion of the Albany metropolitan centre to expand the retail space, create a dining precinct, and build two office towers (rising above a two-storey retail podium with greater than standard stud height) one of which is 74.5 metres in height. As an illustration of the development enabled, the approved plans for the Albany development are attached as **Appendix B** to this submission. Other development which has occurred recently in the Albany metropolitan centre includes a new hotel, multiple apartment and commercial developments (including the new Mitre 10 national headquarters), a new aquatic centre, and a park and ride facility.
- (b) Another example is the new commercial development, town square and food and beverage precinct developed at the Sylvia Park metropolitan centre. Kiwi Property has also advised that it proposes further mixed-use development within the centre, including a second office tower, hotel and potentially build to rent apartments. Further office, hotel and residential (including Kāinga Ora) development is also planned or under construction in proximity to the metropolitan centre.
23. The redevelopment that is occurring at Albany, Sylvia Park and the other metropolitan centres in Auckland, is the type, form and intensity of development that needs to occur at Johnsonville Shopping Centre to create a vibrant, sustainable and future focused shopping centre redevelopment, that is commercially viable and will proceed.
24. We address below how the draft Spatial Plan currently recognises the role and function of Johnsonville, and how it needs to be amended to ensure that development is enabled at Johnsonville that will achieve the objectives and goals of the Spatial Plan.

⁸ Newmarket, Albany, Takapuna, Westgate, Henderson, New Lynn, Sylvia Park, Botany, Manukau, and Papakura.

The Spatial Plan goals are consistent with the NPS-UD

25. As noted above, SIML supports the Spatial Plan goals identified in paragraph 3 above as being consistent with the objectives of the NPS-UD.
26. In particular, those Spatial Plan goals are consistent with the following NPS-UD objectives:
- (a) Objective 1 - “New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and into the future”;
 - (b) Objective 3 - “... district plans enable ... more businesses and community services to be located in areas of an urban environment in which one or more of the following apply (a) the area is in or near a centre zone or other area with many employment opportunities; (b) the area is well-serviced by existing or planned public transport; (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment”;
 - (c) Objective 4 - “New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations”; and
 - (d) Objective 6 - “Local authority decisions on urban development that affect urban environments are ... (c) responsive, particularly in relation to proposals that would supply significant development capacity”.
27. It is important that the Spatial Plan delivers on these objectives of the NPS-UD. The amendments sought by SIML to the Spatial Plan are consistent with and will help achieve the objectives of the NPS-UD.

SIML seeks consistent recognition of Johnsonville as a metropolitan centre in the Spatial Plan

28. The Johnsonville commercial centre (including the Johnsonville Shopping Centre) falls within the definition of a “metropolitan centre” under the National Planning Standards. However, the Johnsonville centre is not consistently identified as a metropolitan centre in the Spatial Plan.
29. The first set of National Planning Standards came into force on 3 May 2019. The Zone Framework Standard within that set provides that a district plan developed after the National Planning Standards came into force must only contain the types of zones listed in that standard. One of the zone types identified in that standard is ‘metropolitan centre zone’.

30. Under the standard, the 'metropolitan centre zone' is to be used for "[a]reas used predominantly for a broad range of commercial, community, recreational and residential activities [which are] a focal point for sub-regional urban catchments".⁹ (This is to be distinguished from 'town centre zones' in larger urban areas which, under the National Planning Standards, are areas used for commercial, community, recreational and residential activities "that service the needs of the immediate and neighbouring suburbs").¹⁰
31. The Regional Policy Statement for the Wellington Region (**RPS**) identifies the Johnsonville centre as a regionally significant centre. The RPS supports new development in regionally significant centres to increase the range and diversity of activities occurring in those centres and to maintain the centres' vibrancy and vitality.¹¹ The RPS also recognises the social and economic benefits of encouraging the development of regionally significant centres.¹²
32. The Spatial Plan also recognises that Johnsonville is a:
- (a) "larger scale sub-regional ... centre" which offers "a wide range of service and employment opportunities including supermarkets, department stores and community facilities";¹³ and
 - (b) a "regionally significant commercial centre" that serves a number of adjacent suburbs and is the third largest employment area outside of the Wellington city centre".¹⁴
33. Johnsonville centre includes regionally and sub-regionally significant facilities and businesses, such as the Wellington Traffic Operations Centre, the Johnsonville train and bus interchange, the Johnsonville Pacific Radiology ultra-sound and x-ray facility, the head office of Heritage Lifecare and the Wellington office of the MAS insurance and investment company.
34. Johnsonville also has a number of significant community and recreational facilities that serve the sub-region, including the Johnsonville police station, medical centre, community centre, the new Waitohi community hub (which includes a new library, café and kindergarten), citizens advice bureau, Keith Spry pool, and Alex Moore Park.

⁹ Table 13: Zone names and descriptions, Zone Framework Standard, National Planning Standards.

¹⁰ Table 13: Zone names and descriptions, Zone Framework Standard, National Planning Standards.

¹¹ Section 3.9 *Regional form, design and function*, Objective 22(b) and Policy 30(b) RPS.

¹² Section 3.9 *Regional form, design and function*, RPS.

¹³ *What do they look like now?* Outer Suburbs tab, Spatial Plan.

¹⁴ *Johnsonville, What do they look like now?* Outer Suburbs tab, Spatial Plan.

35. It is clear, as referenced in the RPS and draft Spatial Plan, that Johnsonville is a sub-regional centre and the focal point for a sub-regional urban catchment. To be consistent with the National Planning Standards, the correct terminology to be used for the Johnsonville centre in the Spatial Plan is 'metropolitan centre'.
36. In one passage the Spatial Plan, indirectly, recognises that Johnsonville should be treated as a "metropolitan centre" for the purposes of the NPS-UD, stating:¹⁵
- "... the NPS-UD requires the Council to enable development of at least 6 storeys within walking distance of the edge of 'metropolitan centres'. This applies to Johnsonville town centre."
37. However, the term 'metropolitan centre' is not used to describe Johnsonville elsewhere in the Spatial Plan. This is inconsistent with the National Planning Standards, the RPS and the objective of the Spatial Plan to provide significant residential development in proximity to the Johnsonville centre.
38. SIML seeks that the Spatial Plan consistently identify Johnsonville as a metropolitan centre. This needs to be addressed by amending a number of sections in the Spatial Plan as set out in **Appendix A** (at paragraphs 2(a)-(j)) to this submission.

Johnsonville is ideally located for further development and intensification to meet the needs of Wellington City

39. The Spatial Plan recognises that Johnsonville is well suited to development and intensification as it is:
- (a) "largely situated in a relatively flat basin";¹⁶
 - (b) serviced by an easily accessible rail station and bus interchange that provides access to the Wellington City centre and to other parts of Wellington City and the region;¹⁷ and
 - (c) located in an area which has a lower level of natural hazard risk relative to several other parts of the city.¹⁸
40. The Spatial Plan currently provides for the largest area of proposed residential intensification (outside of the Central Area) in and around the Johnsonville centre to take advantage of these attributes.

¹⁵ *Northern Suburbs What's impacted by the NPS-UD?* Outer Suburbs tab, Spatial Plan.

¹⁶ *Johnsonville, What do they look like now?* Outer Suburbs tab, Spatial Plan.

¹⁷ *Johnsonville, What do they look like now?* Outer Suburbs tab, Spatial Plan.

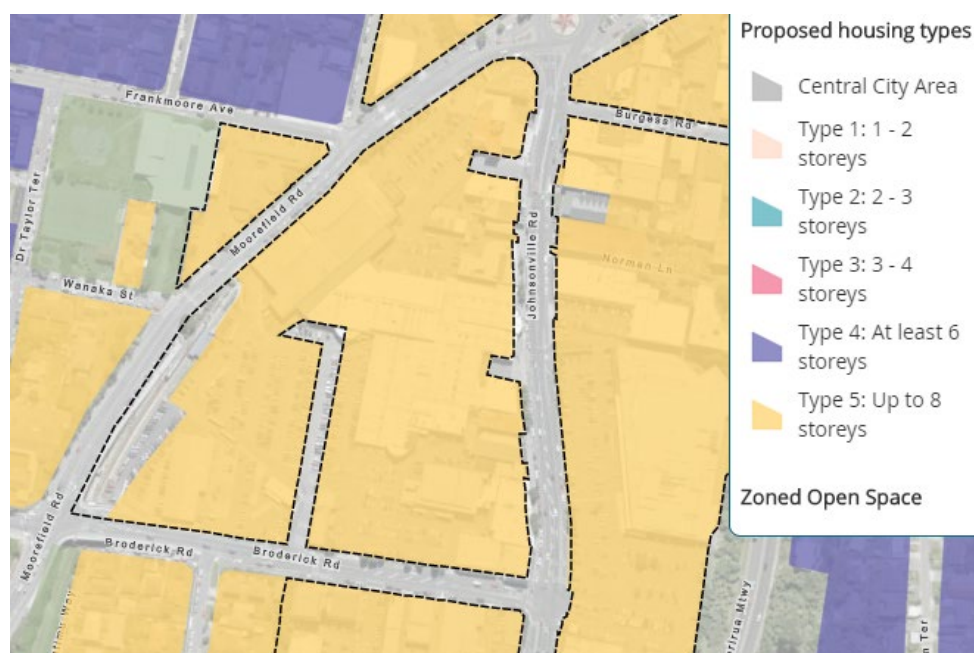
¹⁸ *What might they look like in the future and how will we get there?* Outer Suburbs tab, Spatial Plan.

41. Johnsonville is also:
 - (a) located in close proximity to three of the greenfields 'opportunity sites' for accommodating Wellington City's population growth identified in the Spatial Plan – Upper Stebbings Valley, Glenside West and Lincolnshire Farm; and
 - (b) adjacent, and highly connected, to State Highway 1.
42. Supporting the development of Johnsonville as a metropolitan centre with significant commercial office space and established community services is also critical for risk management in the event of a natural hazard.
43. Johnsonville is also located roughly equi-distant from the Wellington CBD, the Porirua City centre and the Hutt City centre. This means that Johnsonville is accessible to these city centres and can play an even greater role as a commercial hub to support the Wellington CBD.
44. Coordinated single ownership of the major central portion of the centre offers a rare opportunity for comprehensive redevelopment that will integrate enhanced regionally significant facilities and substantial residential growth. Comprehensive development that is well planned allows benefits such as a high-quality public realm, public access to attractive facilities, and development intensity to be maximized while avoiding adverse amenity effects. This contrasts with piecemeal intensification in existing areas where it is difficult to amalgamate sites to achieve intensification, which can lead to compromised amenity outcomes.
45. However, to fulfil this role and facilitate the redevelopment of Johnsonville to create a high-quality public realm, further height and intensification must be enabled on the Johnsonville Shopping Centre site.

SIML seeks for development of up to 18 storeys to be allowed at the Johnsonville Shopping Centre site

46. The Spatial Plan currently proposes allowing development of up to eight storeys at the Johnsonville Shopping Centre site (see Figure 2 below). This is only two storeys greater than the proposed height for residential development around the centre.

Figure 2 – extract from the Spatial Plan showing the density of development currently proposed at the Johnsonville Shopping Centre site



47. An eight-storey permitted height limit on development at the Johnsonville centre would neither:
- allow intensification of a sufficient scale to create a viable mixed office, residential, retail and entertainment precinct of the type appropriate for a vibrant modern metropolitan centre; nor
 - enable efficient use of the Johnsonville Shopping Centre site.
48. As evidenced by the resource consent recently obtained for the Albany metropolitan centre, and recent development in the Sylvia Park metropolitan centre, a metropolitan centre needs to provide a mix of retail, entertainment (including dining), commercial and residential (apartment) uses, and attractive public spaces and good urban design (including a range of building heights across the development). SIML needs to provide, and is planning for, multiple use types to emerge at the Johnsonville Shopping Centre site over time.
49. For this type of development to be viable, there needs to be provision for commercial and residential towers to be located above or adjacent to shopping and entertainment facilities.
- To be viable (relative to land and development costs) office or residential towers in metropolitan centre zones typically need to be developed to optimal heights which range from medium-rise 8-10 levels through as much as 20 storeys or more. (As already noted, in the Auckland Unitary Plan the

metropolitan centre zone permits buildings up to 72.5 metres (22 storeys) in height, unless a height variation control specifies otherwise.)¹⁹

- (b) Greater height allowance would enable more efficient land use by allowing mixed-uses to be combined (e.g. a hotel above residential apartments).
 - (c) The greater density of development enabled by a greater height allowance will also generate greater public transport patronage and active transport modes.
50. The Albany development is a good example to illustrate how a retail podium is supported by and is integrated with an office or residential tower. Typically, a retail and entertainment podium can be 2-3 levels with high floor to floor heights (ranging between 4 – 5 metres and to over 6 metres for cinemas), while office, hotel and residential apartments can have floor to floor heights of between 4 and 4.3 metres.
51. A retail and entertainment podium with integrated tower development also has the following land use and urban design benefits:
- (a) it enables an efficient use of a site;
 - (b) towers can be located with a set back from site boundaries to mitigate effects on adjoining properties and the street;
 - (c) high rise residential accommodation in towers can provide new, high amenity dwelling options, and can contribute substantially to residential intensification; and
 - (d) the towers provide height variation and a focal point for the centre.
52. In the Johnsonville context, additional height to enable tower development would be particularly appropriate due to the basin topography of the site within the surrounding area, and to create variation compared to the proposed height for residential development surrounding the centre. Enabling greater height in the commercial area at the Johnsonville centre would create a better urban design outcome.
53. Enabling a comprehensive mixed-use development on the Johnsonville Shopping Centre site that incorporates tower development would also act as a catalyst for other commercial and residential development and intensification in and adjacent to the centre.

¹⁹ Standard H9.6.1 (1), Auckland Unitary Plan.

54. The proposed height for the Johnsonville Shopping Centre site of only 8 storeys is restrictive and will compromise the ability for Johnsonville to develop as a regionally significant centre.
55. To enable a viable mixed-use redevelopment of the Johnsonville Shopping Centre site, SIML seeks amendment of the Spatial Plan to allow development of up to 18 storeys, or approximately 72 metres (given the floor to floor height(s) appropriate for the proposed types of development), for the Johnsonville Shopping Centre site.
56. SIML seeks that the *Johnsonville What is anticipated here?* section under the Outer Suburbs tab be amended to read:

“Business, mixed use and apartment buildings (type 6): up to 18 storeys on the Johnsonville Shopping Centre site.

Business, mixed use and apartment buildings (type 5): up to 8 storeys in other parts of the Johnsonville metropolitan centre.”

The scope and impact of the density and proposed housing type provisions in the Spatial Plan provisions need to be clarified

57. SIML seeks amendments to the Spatial Plan to clarify the scope and intent of the density and ‘proposed housing type’ provisions in the plan.
58. In particular, SIML seeks clarification that:
- (a) in appropriate centre locations the proposed allowable building heights shown in the Spatial Plan apply to business and mixed-use development, as well as residential development; but
 - (b) the fact that development (e.g. apartment buildings) of up to six or even eight storeys may be allowed on a site in the Outer Suburbs does not mean that that site is suitable to be developed for mixed-use (or business) development.
59. The description of the housing typologies in the draft Spatial Plan could be interpreted as meaning that mixed-use (including business) development would be enabled over large parts of the city. This would be contrary to the goals and direction of the Spatial Plan to create a compact city with a compact urban form, and well-functioning urban environments.
60. Specifically, SIML seeks that:
- (a) the phrase “proposed housing types” in the Layer List in the Map Builder tab of the Spatial Plan be amended to “proposed development density and height”;

- (b) the phrase 'Proposed housing typology' in the map Legends in the relevant sections of the Outer Suburbs tab²⁰ be amended to read 'Proposed development density and height'; and
- (c) for Outer Suburbs other than Johnsonville,²¹ the descriptions of development types 4 (at least six storeys) and 5 (up to eight storeys) in the Outer Suburbs tab be amended, as set out below, to make it clear that a Spatial Plan notation indicating an allowed building height of six or eight storeys does not necessarily mean that a site has been determined to be appropriate for mixed-use (or business use):²²

~~"Mixed use and a~~Apartment buildings, and in identified centres business or mixed-use (type 4)"

~~"Mixed use and a~~Apartment buildings, and in identified centres business or mixed-use (type 5)".

SIML seeks investigation of the impacts of proposed growth on the Johnsonville transport network

- 61. SIML supports the retention and implementation of the Spatial Plan proposals to:
 - (a) carry out an assessment of the Johnsonville metropolitan centre and State Highway severance issues and options for improving pedestrian connections to the main commercial and community areas in Johnsonville;²³ and
 - (b) carry out a transport assessment to identify options for multimodal transport in Newlands, including walking and cycling access and strengthened connections to the Johnsonville metropolitan centre.²⁴
- 62. SIML seeks for the Spatial Plan to specifically identify the need to investigate:
 - (a) double-tracking of the Johnsonville railway line, particularly the section of railway line entering and within Johnsonville station, to support a more efficient and frequent service and minimise delays; and

²⁰ The *Housing Density: Thorndon, Aro Valley/Holloway Road/The Terrace, Mt Victoria and Housing Density: Mt Cook, Newtown and Berhampore* sections of the Inner Suburbs tab and the Tawa, Churton Park, Newlands, Khandallah, Ngaio, Crofton Downs, Karori, Ke burn, Haitaitai, Kilbirnie, Miramar, Lyall Bay, Brooklyn, Island Bay *What is anticipated here?* sections of the Outer Suburbs tab to the Spatial Plan.

²¹ SIML's proposed wording for the equivalent Johnsonville provisions is set out in paragraph 2(g) of Appendix A to this submission.

²² Changes would be required in the the Tawa, Churton Park, Johnsonville, Newlands, Khandallah, Ngaio, Crofton Downs, Karori, Kelburn, Haitaitai, Kilbirnie, Miramar, Lyall Bay, Brooklyn, Island Bay *What is anticipated here?* sections of the Outer Suburbs tab to the Spatial Plan.

²³ *Johnsonville What is anticipated here?* Outer Suburbs tab, Spatial Plan.

²⁴ *Newlands What is anticipated here?* Outer Suburbs tab, Spatial Plan.

- (b) how to improve the integration of the Johnsonville station with the metropolitan centre.
63. It is also noted that the amount of commuter through traffic using Johnsonville Road detracts from its ability to function as a vibrant public high street.
64. Therefore, SIML also seeks recognition in the Spatial Plan of the need to investigate:
- (a) the impacts of proposed growth on the Johnsonville transport network, particularly the potential impacts of that growth on traffic congestion along Johnsonville Road; and
 - (b) transport improvements to facilitate and enable a vibrant high street along Johnsonville Road within the Johnsonville metropolitan centre.
65. In particular, SIML seeks for such an assessment to consider whether configuration changes are required at the Moorefield Road/Johnsonville Road/State Highway 1 intersection (including further investigations regarding on- and off-ramp connections from State Highway 1 to Helston Road) or the State Highway 1/Johnsonville Road/Fraser Avenue/Corlett Street intersection to reduce commuter traffic on Johnsonville Road.

SIML supports recognition of the need for investment in three waters and other infrastructure in Johnsonville to support growth opportunities

66. SIML also supports the Spatial Plan proposals to:
- (a) carry out a detailed assessment of the existing three waters network capacity in Johnsonville to determine the level of investment required to service projected growth;²⁵ and
 - (b) develop and implement an investment programme for the Johnsonville metropolitan centre and town centres.²⁶

Conclusion

67. The changes to the Spatial Plan SIML is seeking are set out in **Appendix A** to this submission.

²⁵ *Johnsonville What is anticipated here?* Outer Suburbs tab, Spatial Plan.

²⁶ *Suburban Centres Planning and Investment* drop down box in the *Vibrant & Prosperous* section of the Action Plan tab.

68. SIML appreciates the opportunity to provide comments on the Spatial Plan and would be happy to discuss the matters raised and amendments sought in this submission in further detail.
69. SIML appreciates the importance of the role and function of the Johnsonville metropolitan centre and seeks a planning framework that will support and enable a type and form of development for the centre that will achieve the goals of the Spatial Plan, and the objectives and policies of the NPS-UD and RPS.
70. As noted above, SIML would also appreciate the opportunity to be involved in the development of a place-based plan for managing growth and change in Johnsonville.

DATED this 5th day of October 2020

Stride Investment Management Limited by its
solicitors and duly authorised agents
MinterEllisonRuddWatts



B J Tree

Appendix A – Amendments to the Spatial Plan sought by SIML

1. Retention of the goals identified in the Spatial Plan.
2. The Johnsonville commercial centre to be consistently identified as a metropolitan centre in the Spatial Plan through:
 - (a) amendment of the third paragraph in the *Vibrant & Prosperous* drop-down box under the Goals tab to read:

“Metropolitan and town centres are revitalised to support their viability and stimulate adjoining residential growth and development”;

- (b) amendment of the *Johnsonville* drop-down box under the *What do they look like now?* section of the Outer Suburbs tab to read:

“The Johnsonville metropolitan centre is 10km north of the central city. ... “;

Johnsonville is a regionally significant metropolitan centre that serves a number of adjacent suburbs and is the third largest employment area outside of the city centre.”

- (c) amendment of the fourth paragraph of the *What do they look like now?* section of the Outer Suburbs tab to read:

“... the Johnsonville metropolitan centre and the larger scale town centres such as ~~Johnsonville, Kilbirnie, Karori and Miramar town centres~~ offer ...”;

- (d) amendment of the second and third paragraphs under the *What’s the current situation?* section of the Outer Suburbs tab to read:

“There are medium density residential areas surrounding the existing Johnsonville metropolitan centre and Kilbirnie town centres, with ...

the Johnsonville metropolitan centre and Kilbirnie town centres allow ...

- (e) amendment of the first paragraph of the *What changes are we proposing?* section of the Outer Suburbs tab to read:

“... This is a 30-year plan based around the concept of a ‘growth spine’ that provides a key development, transport and investment corridor for the city anchored by the Johnsonville metropolitan centre and Kilbirnie town centres”;

- (f) amendment of the first paragraph of the *Northern Suburbs What’s impacted by the NPS-UD 2020?* section of the Outer Suburbs tab to read:

“... In addition to this, the NPS-UD requires the Council to enable development of at least 6 storeys within walking distance of the edge

of the Johnsonville 'metropolitan centres'. ~~This applies to Johnsonville town centre.~~”;

- (g) amendment of the *Johnsonville What is anticipated here?* section under the Outer Suburbs tab to read:

... Business and mixed use (type 6) up to 18 storeys on the Johnsonville Shopping Centre site

Business, mixed use and apartment buildings (type 5): up to 8 storeys in other parts of the Johnsonville metropolitan centre

~~Mixed use and~~ Apartment buildings (type 4) 6 storeys within a 10-minute walking catchment from the edge of the Johnsonville metropolitan centre and railway stations.

...

- Ensure new development within the metropolitan centre is designed so that ...

...

- Carry out an assessment of the metropolitan centre and State highway severance issues and options ...”;

- (h) amendment of the *Newlands What is anticipated here?* section under the Outer Suburbs tab to read:

“... Carry out a transport assessment to identify options for multimodal transport in the suburb, including walking and cycling access and strengthened connections to the Johnsonville metropolitan centre and ...”;

- (i) amendment of the *High Density Commercial and Residential* drop-down box in the *Compact* section of the Action Plan tab to read:

“Ensure higher density residential and commercial development is concentrated in the Central City and Johnsonville metropolitan centre, in and around town centres, and along key transit routes.”

- (j) amendment of the *Suburban Centres Planning and Investment* drop down box in the *Vibrant & Prosperous* section of the Action Plan tab to read:

“Metropolitan and Town Centres, Planning and Investment

Develop and implement a Metropolitan and Town Centres Investment Programme”.

3. Amendment of the Spatial Plan to include a new ‘Proposed development density’ to allow development of up to 18 storeys, or approximately 60 metres, within the Johnsonville Shopping Centre site.

4. Amendments to the Spatial Plan to clarify the scope and intent of the density and 'proposed housing type' provisions in the plan through:
- (a) amendment of the phrase 'proposed housing types' in the Layer List in the Map Builder tab of the Spatial Plan to 'proposed development density and height';
 - (b) amendment of the phrase 'Proposed housing typology' in the map Legends in the relevant sections of the Outer Suburbs tab²⁷ to read 'Proposed development density and height'; and
 - (c) for Outer Suburbs other than Johnsonville,²⁸ amendment of the descriptions of development types 4 (at least six storeys) and 5 (up to eight storeys) in the Outer Suburbs tab as set out below:²⁹

~~"Mixed use and a~~Apartment buildings and, in identified centres for business or mixed-use (type 4)"

~~"Mixed use and a~~Apartment buildings and, in identified centres for business or mixed-use (type 5)".
5. Retention and implementation of the Spatial Plan proposals to:
- (a) carry out an assessment of the Johnsonville metropolitan centre and State Highway severance issues and options for improving pedestrian connections to the main commercial and community areas in Johnsonville; and
 - (b) carry out a transport assessment to identify options for multimodal transport in Newlands, including walking and cycling access and strengthened connections to the Johnsonville metropolitan centre.
6. Recognition in the Spatial Plan of the need to investigate:
- (a) double-tracking of the Johnsonville railway line, and in particular the section of railway line entering and within Johnsonville station;
 - (b) how to improve the integration of the Johnsonville station with the metropolitan centre;

²⁷ *The Housing Density: Thorndon, Aro Valley/Holloway Road/The Terrace, Mt Victoria and Housing Density: Mt Cook, Newtown and Berhampore* sections of the Inner Suburbs tab and the Tawa, Churton Park, Newlands, Khandallah, Ngaio, Crofton Downs, Karori, Ke burn, Haitaitai, Kilbirnie, Miramar, Lyall Bay, Brooklyn, Island Bay *What is anticipated here?* sections of the Outer Suburbs tab to the Spatial Plan.

²⁸ SIML's proposed wording for the equivalent Johnsonville provisions is set out at paragraph 2(g) above.

²⁹ Changes would be required in the the Tawa, Churton Park, Johnsonville, Newlands, Khandallah, Ngaio, Crofton Downs, Karori, Kelburn, Haitaitai, Kilbirnie, Miramar, Lyall Bay, Brooklyn, Island Bay *What is anticipated here?* sections of the Outer Suburbs tab to the Spatial Plan.

- (c) the impacts of proposed growth on the Johnsonville transport network, particularly the potential impacts of that growth on traffic congestion along Johnsonville Road; and
- (d) transport improvements to facilitate and enable a vibrant high street along Johnsonville Road within the Johnsonville metropolitan centre.

7. Retention and implementation of the Spatial Plan proposals to:

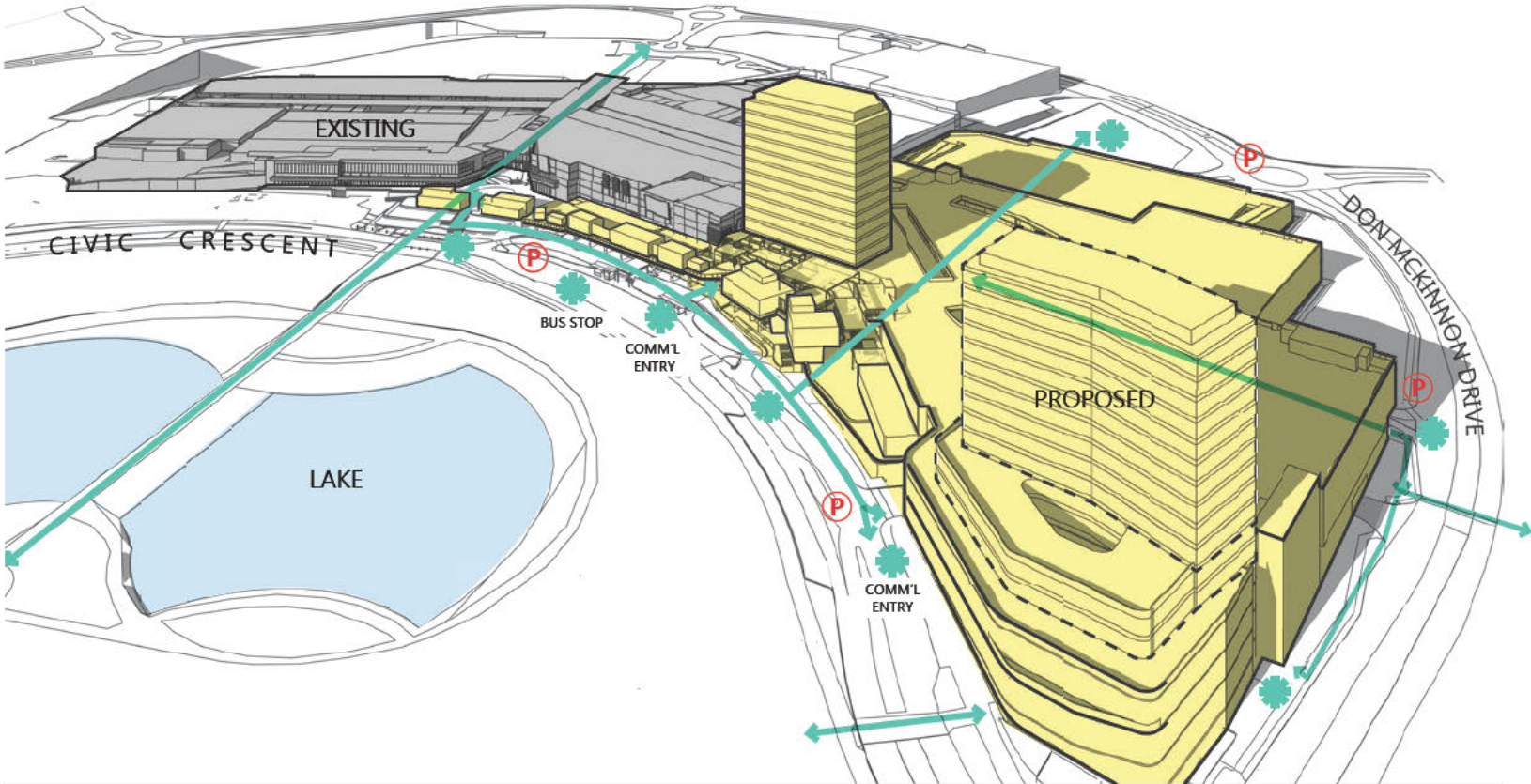
- (a) carry out a detailed assessment of the existing three waters network capacity in Johnsonville to determine the level of investment required to service projected growth; and
- (b) develop and implement an investment programme for the Johnsonville metropolitan centre and town centres.

Appendix B – Approved plans for the Albany metropolitan centre redevelopment



WESTFIELD ALBANY
RESOURCE CONSENT | JUNE 2019

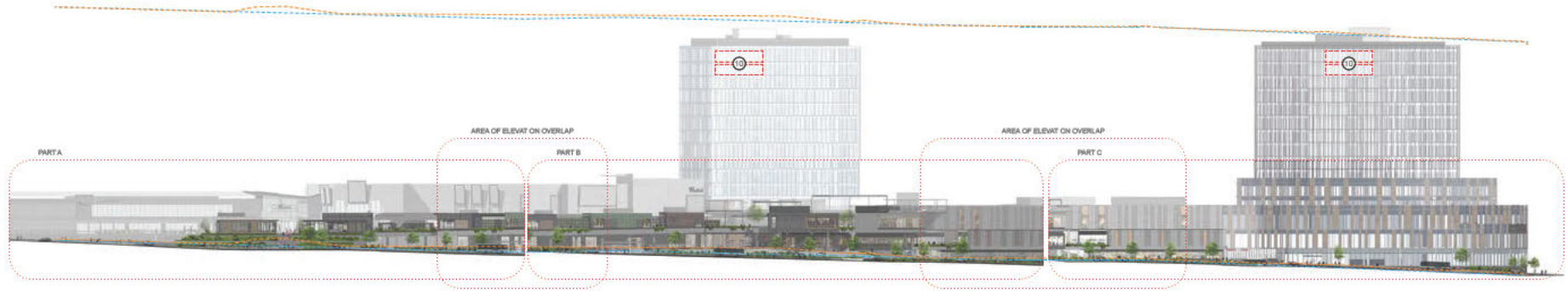




PEDESTRIAN / BIKE CONNECTION
↔

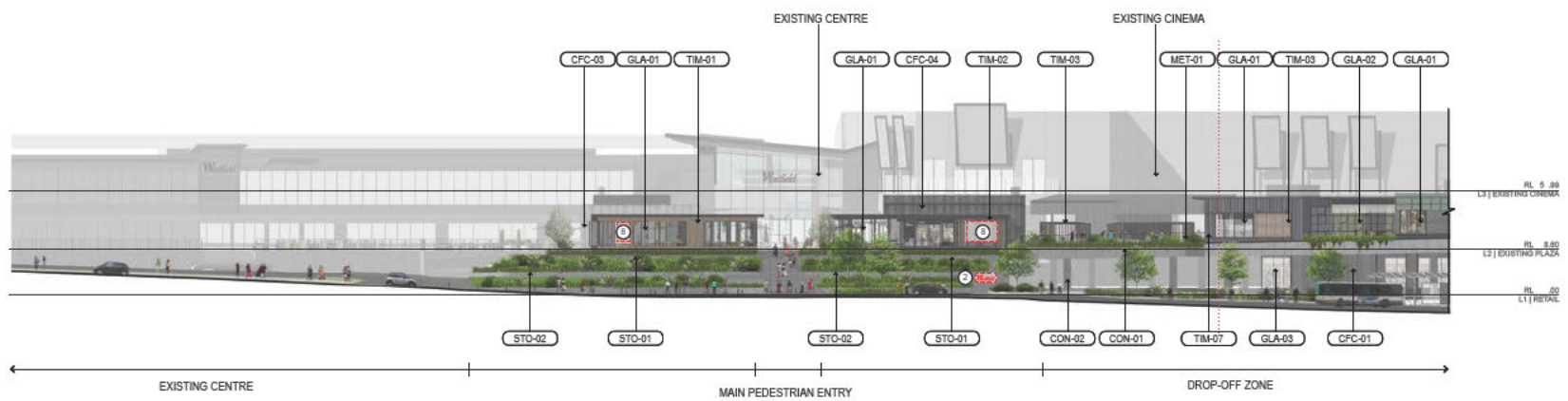
PEDESTRIAN ENTRIES
★

SITE CONTEXT
AXIS & INTERFACE



1 NORTH ELEVATION - CIVIC CRESCENT
1:500

--- 72.5 MAX. BUILDING HEIGHT ABOVE EXISTING GL
--- 72.5 MAX. BUILDING HEIGHT ABOVE EXISTING 2005



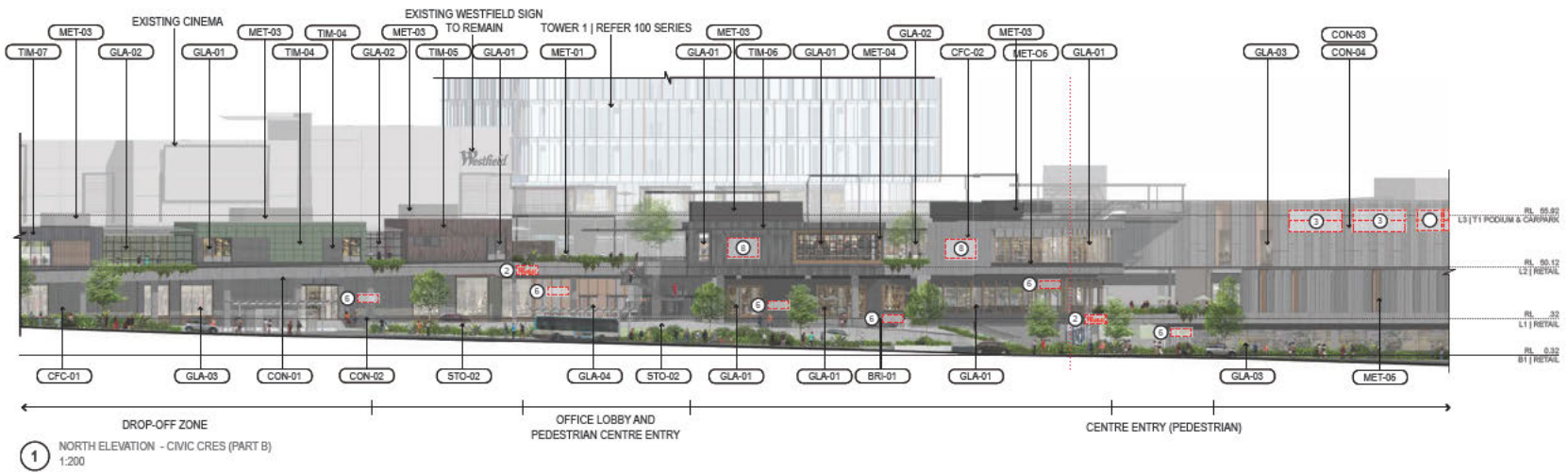
2 NORTH ELEVATION - CIVIC CRES (PART A)
1:200

- SIGNAGE DETAILS**
- 1 Fixed - 6m x 2.5m(h) (Westfield) - 3D Illuminated Signage
 - 2 Fixed - 2.4m x 1m(h) (Westfield) - 3D Illuminated Signage
 - 3 Fixed - 6m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - 4 Fixed - 3m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - 5 Fixed - 3.8m x 1.5m(h) (tenant) - 3D Illuminated Signage
 - 6 Fixed - 2.4m x 1m(h) (tenant) - 3D Illuminated Signage
 - 7 Fixed - 12mx3m(h)(Westfield)-Interactive Digital Billboard
 - 8 Fixed - 2.4m x 1.6m(h) (tenant) - 3D Illuminated Signage
 - 9 Fixed - 3.8m x 2.4m(h) (tenant) - 3D Illuminated Signage
 - 10 Fixed - 12m x 3m(h) (tenant) - 3D Illuminated Signage
 - 11 Fixed - 4m x 2.4(h) (tenant) - 3D Illuminated Signage
- REFER TO LANDSCAPE ARCHITECTS DRAWINGS FOR LANDSCAPE ACTIVATION

PROPOSED ELEVATION NORTH | CIVIC CRESCENT



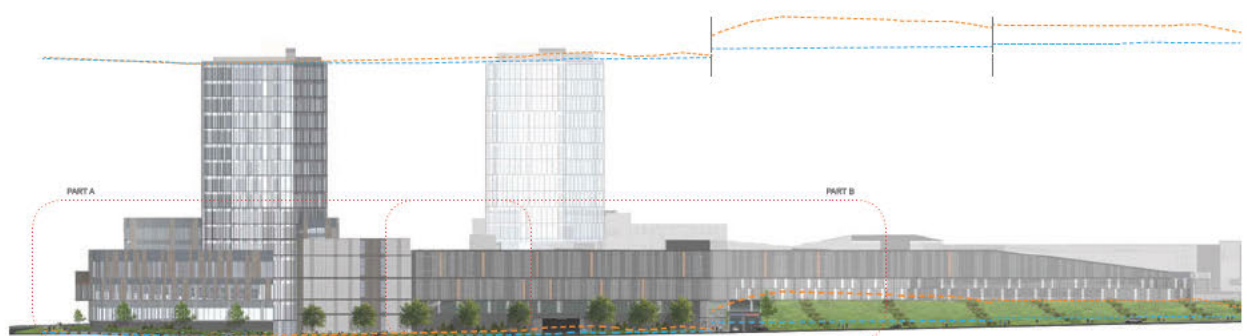
1:200 @ A0
RESOURCE CONSENT
DWG #: RC 031



- SIGNAGE DETAILS**
- ① Fixed - 6m x 2.5m(h) (Westfield) - 3D Illuminated Signage
 - ② Fixed - 2.4m x 1m(h) (Westfield) - 3D Illuminated Signage
 - ③ Fixed - 6m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ④ Fixed - 3m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ⑤ Fixed - 3.0m x 1.5m(h) (tenant) - 3D Illuminated Signage
 - ⑥ Fixed - 2.4m x 1m(h) (tenant) - 3D Illuminated Signage
 - ⑦ Fixed - 12m x 3m(h) (Westfield) - Interactive Digital Billboard
 - ⑧ Fixed - 2.4m x 1.6m(h) (tenant) - 3D Illuminated Signage
 - ⑨ Fixed - 3.0m x 2.4m(h) (tenant) - 3D Illuminated Signage
 - ⑩ Fixed - 12m x 3m(h) (tenant) - 3D Illuminated Signage
 - ⑪ Fixed - 4m x 2.4(h) (tenant) - 3D Illuminated Signage
- REFER TO LANDSCAPE ARCHITECTS DRAWINGS FOR LANDSCAPE ACTIVATION

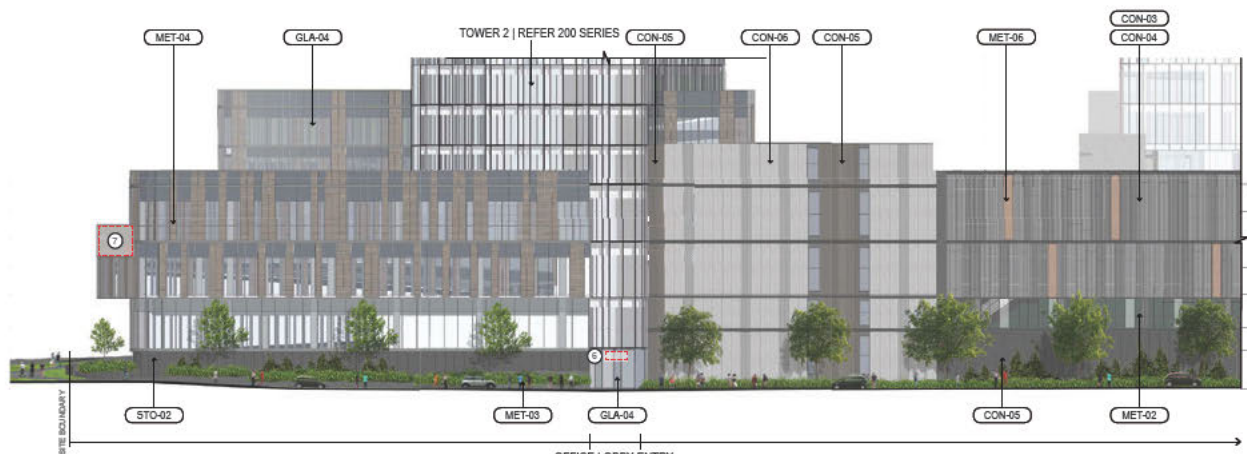
PROPOSED ELEVATION NORTH | CIVIC CRESCENT

1:200 @ A0
0 2 4 6 8 10 12 14 16
RESOURCE CONSENT
DWG #: RC 032



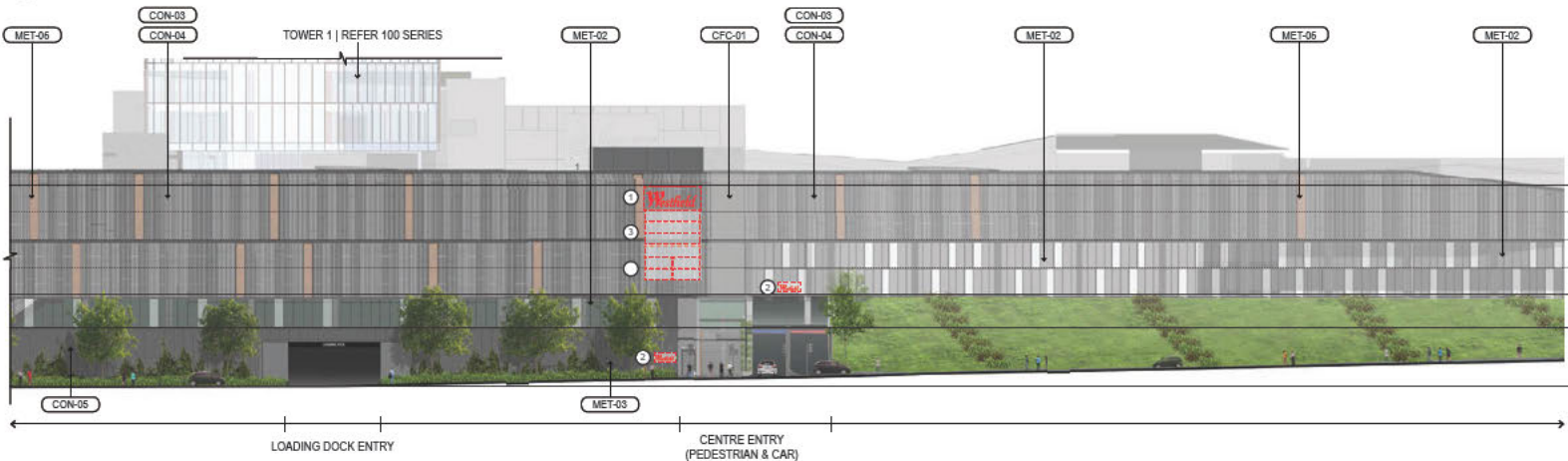
--- 72.5 MAX. BUILDING HEIGHT ABOVE EXISTING GL
 --- 72.5 MAX. BUILDING HEIGHT ABOVE EXISTING 2005

1 WEST ELEVATION - DON MCKINNON DRIVE
 1:500



RL 55.93
 L3 | T2 PDD UM & CARPARK
 RL 53.02
 L2 M | VY LANDING
 RL 50.12
 L2 | RETAIL
 RL 7.08
 L1 M | CARPARK
 RL 32
 L1 | RETAIL
 RL 0.72
 B1 | CARPARK
 RL 38.56
 B2 | RETAIL
 RL 37.45
 B3 | MIXED-USE ENTRY

2 WEST ELEVATION - DON MCKINNON DRIVE (PART A)
 1:200



RL 55.92
 L3 | T2 POOLUM & CARPARK
 RL 53.02
 L2 M | VY LAND NG
 RL 50.12
 L2 | RETAIL
 RL 7.08
 L1 M | CARPARK
 RL 32
 L1 | RETAIL
 RL 0.72
 B1 | CARPARK
 RL 3 88
 B3 | LOADING DOOR

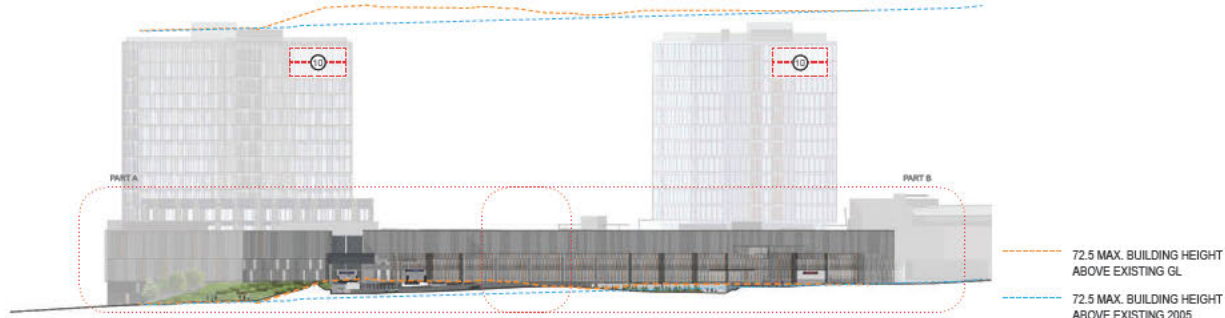
3 WEST ELEVATION - DON MCKINNON DRIVE (PART B)
 1:200

- SIGNAGE DETAILS**
- ① Fixed - 6m x 2.5m(h) (Westfield) - 3D Illuminated Signage
 - ② Fixed - 2.4m x 1m(h) (Westfield) - 3D Illuminated Signage
 - ③ Fixed - 6m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ④ Fixed - 3m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ⑤ Fixed - 3.0m x 1.5m(h) (tenant) - 3D Illuminated Signage
 - ⑥ Fixed - 2.4m x 1m(h) (tenant) - 3D Illuminated Signage
 - ⑦ Fixed - 12mx3m(h)(Westfield)-Interactive Digital Billboard
 - ⑧ Fixed - 2.4m x 1.6m(h) (tenant) - 3D Illuminated Signage
 - ⑨ Fixed - 3.0m x 2.4m(h) (tenant) - 3D Illuminated Signage
 - ⑩ Fixed - 12m x 3m(h) (tenant) - 3D Illuminated Signage
 - ⑪ Fixed - 4m x 2.4(h) (tenant) - 3D Illuminated Signage
- REFER TO LANDSCAPE ARCHITECTS DRAWINGS FOR LANDSCAPE ACTIVATION

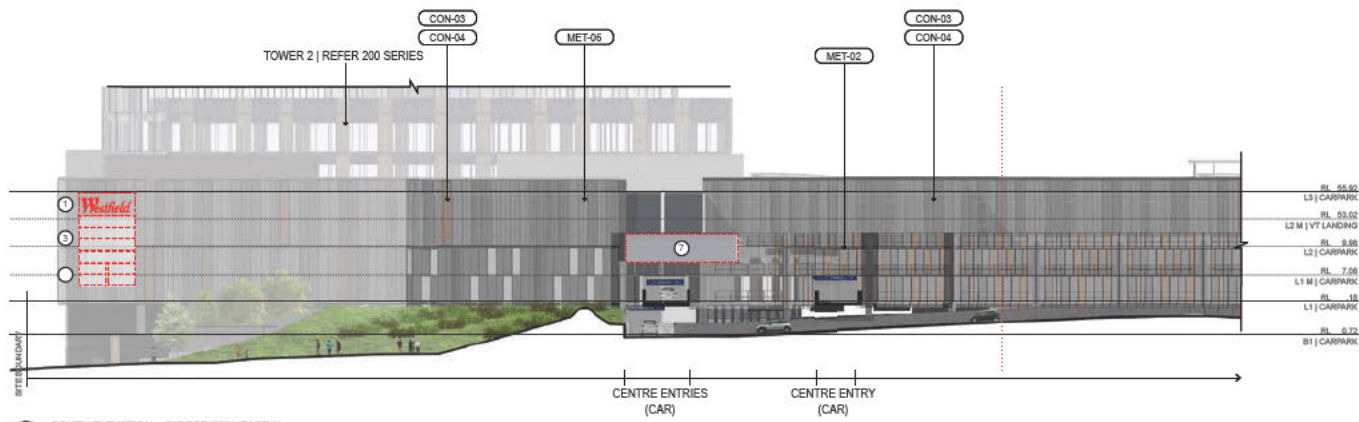
PROPOSED ELEVATION
 WEST | DON MCKINNON DRIVE

1:200 @ A0
 0 2 4 6 8 10 12 14 16

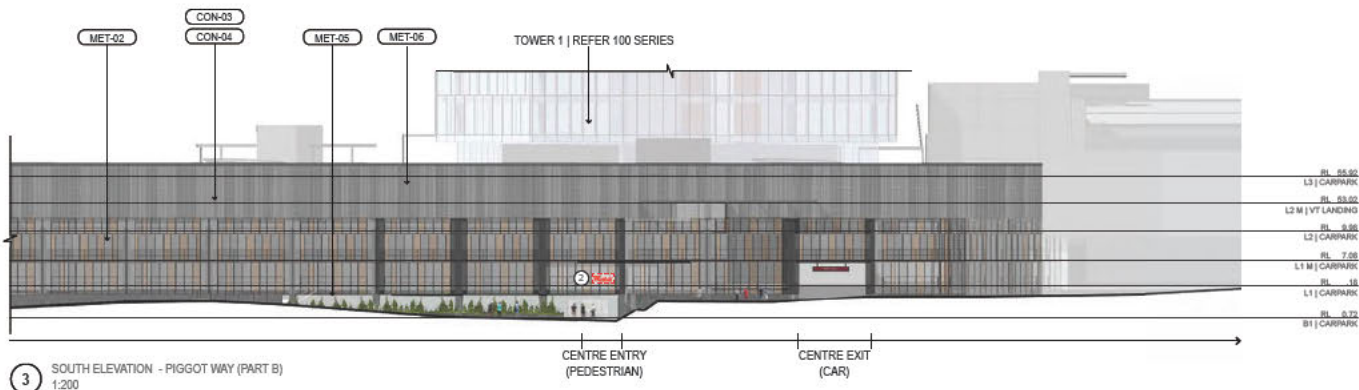
RESOURCE CONSENT
 DWG #: RC 033



1 SOUTH ELEVATION - PIGGOT WAY
1:500



2 SOUTH ELEVATION - PIGGOT WAY (PART A)
1:200



3 SOUTH ELEVATION - PIGGOT WAY (PART B)
1:200

- SIGNAGE DETAILS**
- ① Fixed - 6m x 2.5m(h) (Westfield) - 3D Illuminated Signage
 - ② Fixed - 2.4m x 1m(h) (Westfield) - 3D Illuminated Signage
 - ③ Fixed - 6m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ④ Fixed - 3m x 1.25m(h) (tenant) - 3D Illuminated Signage
 - ⑤ Fixed - 3.0m x 1.5m(h) (tenant) - 3D Illuminated Signage
 - ⑥ Fixed - 2.4m x 1m(h) (tenant) - 3D Illuminated Signage
 - ⑦ Fixed - 12mx3m(h)(Westfield)-Interactive Digital Billboard
 - ⑧ Fixed - 2.4m x 1.6m(h) (tenant) - 3D Illuminated Signage
 - ⑨ Fixed - 3.0m x 2.4m(h) (tenant) - 3D Illuminated Signage
 - ⑩ Fixed - 12m x 3m(h) (tenant) - 3D Illuminated Signage
 - ⑪ Fixed - 4m x 2.4(h) (tenant) - 3D Illuminated Signage
- REFER TO LANDSCAPE ARCHITECTS DRAWINGS FOR LANDSCAPE ACTIVATION

PROPOSED ELEVATION SOUTH | PIGGOT WAY

1:200 @ A0

 RESOURCE CONSENT
 DWG #: RC 034



CORNER CIVIC CRESCENT & DON MCKINNON DRIVE
PERSPECTIVE

RESOURCE CONSENT
DWG #: RC 078





CIVIC CRESCENT
PERSPECTIVE

RESOURCE CONSENT
DWG #: RC 079

SCENTRE GROUP
Westfield
GIC



Urban Design Memo

To Stride Investment Management Limited, attention Jarrod Thompson
Minter Ellison Rudd Watts, attention Bianca Tree

From Graeme McIndoe and Andrew Burns, McIndoe Urban Ltd

Date 12 November 2020

Subject **Urban Design Statement in support of the
Stride Investment Management Ltd (SIML) submission on the Spatial Plan**

SUPPORT IN PRINCIPLE FOR METROPOLITAN CENTRE STATUS

1. We support in principle that the Johnsonville centre is designated as a Metropolitan Centre. As a Metropolitan Centre it is important that high quality development is enabled that delivers high quality urban design, and a structure, form and outcomes that are fit for purpose and place.
2. We consider potential for high-quality comprehensive development including taller buildings is a major factor in support of Johnsonville as a vibrant and viable Metropolitan Centre and we note SIML support for the aims in the Spatial Plan related to ensuring a high-quality outcomes.
3. Coordinated single ownership of the major central portion of the centre offers a rare opportunity for comprehensive redevelopment that will enable enhanced regionally significant facilities and substantial residential growth in an integrated way. Well-planned comprehensive redevelopment allows benefits such as a high-quality public realm, public access to attractive facilities, and development intensity to be maximised while avoiding adverse amenity effects. This contrasts with piecemeal intensification in existing areas where it is difficult to amalgamate sites to achieve intensification, and where there is a high likelihood of compromised amenity outcomes.

BUILDING HEIGHT

4. We support potential for development of taller buildings and consider that these offer multiple benefits in this highly propitious Johnsonville centre location.

These are listed below:

Mix and intensity of activity

5. The option of tall buildings allows a greater range of development types. This in turn supports an enhanced mix and greater intensity of uses that will better meet the needs of people in nearby neighbourhoods and enhance the attractiveness of Johnsonville as a regional destination. A mix of activity and development intensity facilitated by the potential to include tall buildings will also deliver benefits that are well established by urban design research. These include:
 - a. savings on land, infrastructure and energy and reduce the economic costs associated with time spent travelling;
 - b. encouraging walking and cycling – bringing health benefits and reducing the need to own a car and thus reducing emissions; and
 - c. increased personal safety through more people occupying the centre on a 24/7 basis.¹

Optimal use of infrastructure

6. Intensity at the centre facilitated by height also:
 - a. optimises the use of and increases the viability of local shops and facilities;
 - b. allows parking and transport infrastructure to be used more efficiently and leads to lower household spending on transport; and
 - c. achieves efficiency in the provision and use of essential infrastructure.

Urban form and identity

7. Taller buildings as part of the Johnsonville centre will:
 - a. differentiate this from the residential areas around, in turn contributing to both a memorable sense of place and to legibility;
 - b. contribute a dramatic skyline, visually accentuating the centre, assisting with way finding, and potentially also marking points of arrival; and

¹ *The Value of Urban Design: The economic, environmental and social benefits of urban design* (MfE, Wellington, 2005, p3)

- c. deliver a step change in the identity of Johnsonville with a successful outcome combining high quality urban form and space, and vibrant activity related to that.

Choice and opportunity

- 8. High-rise residential accommodation will enhance choice by providing new, high-amenity dwelling options close to services and infrastructure, and will contribute substantially to residential intensification in this optimal location.
- 9. The potential for tall buildings in the centre allows site planning and design flexibility, and this in combination with appropriate quality controls is inherently more likely to achieve a positive outcome than a more restrictive approach that limits building types and design opportunities.

THE COMPROMISE OF UNDUE HEIGHT LIMITATION IN THIS CONTEXT

- 10. Conversely, we consider the Spatial Plan's eight storey limit precludes the benefits identified above; is unnecessarily restrictive on development form, type and intensity; and compromises the status of Johnsonville as a metropolitan centre.

DETERMINING AN APPROPRIATE HEIGHT THRESHOLD OR THRESHOLDS

- 11. In order to ensure desirable urban form differentiation from the lower six storey development envelope required by the NPS-UD around the Johnsonville centre, a starting point for investigation of a permitted maximum height might be approximately 12 storeys. A step up from six to 12 storeys follows the precedent of proportional increases of permitted height at the edges of and between parts of Wellington's Central Area. The proportion is typically an approximate doubling in permitted height at each interface. For example from Mt Victoria to Te Aro there is a graduated step up from 10.2m to 18.6m and then to 27m. The step up between 'Low City' and 'High City' within the Central Area varies but is from 40m/43m to variously 55m, 60m, 65m, 75m, 90m and 95m.
- 12. We are confident that that amenity effects at the zone/height interface can be successfully addressed with appropriate controls on the location and design of taller buildings. A range of techniques might be explored to avoid visual domination and manage scale juxtaposition, shading and wind effects.

Approaches may include stepping permitted height thresholds around the periphery such as from Mt Victoria to Te Aro, with heights for Johnsonville centre stepping up from the adjoining six storey residential base. A further approach might be a height recession plane around parts of the periphery of the zone. A precedent for this is the 'Harbour edge height control plane' in Auckland's Unitary Plan that applies to development fronting to the harbour along Quay Street.

13. We also consider that there may be locations in Johnsonville town centre where with good planning and design it may be possible to successfully elevate buildings above a permitted height threshold such as 12 storeys. This will depend on location, bulk and form, and as height increases the proposal should be subject to more rigorous expectations for design quality.
14. However, prior to site analysis and investigation of the urban form and amenity implications of different building intensities, heights and configurations, beyond suggesting a broad starting point we cannot confirm the absolute suitability of any specific height threshold.

TALLER BUILDINGS ARE CONSISTENT WITH ACHIEVING HIGH AMENITY

15. Finally, well-located and designed taller buildings as part of a comprehensively designed masterplan will contribute to a high-quality environment within the centre. This necessitates ensuring the identified positives of high intensity mixed use development are achieved with sensitive planning and design. Such design, in addition to creating coherent and place-appropriate urban form, excellent architecture and a high-quality public realm, will ensure appropriately scaled and coherent definition of streets and other public open spaces. It will address potential visual dominance effects on adjacent and nearby areas and avoid adverse wind effects at street level and shading on important public spaces. These are all matters that can readily be dealt with at the level of the district plan.

END



Katherine Mansfield Birthplace Society Inc.
 Katherine Mansfield House & Garden
 25 Tinakori Road, Thorndon, Wellington 6011
 PO Box 12006, Thorndon, Wellington
 (04) 473 7268
 info@katherinemansfield.com
www.katherinemansfield.com

5 October 2020

KATHERINE MANSFIELD BIRTHPLACE SOCIETY SUBMISSION ON THE WELLINGTON CITY COUNCIL DRAFT SPATIAL PLAN

Summary

The Board of the Katherine Mansfield Birthplace Society Inc. (KMBS) does not support the Draft Spatial Plan currently being consulted on by the Wellington City Council and wishes to express its concerns.

The proposed changes to central Wellington, and more specifically Thorndon, risk devastating and irreversible loss of built heritage and the corruption of the environmental context of one of the city's most significant heritage sites: Katherine Mansfield House & Garden (KMHG).

Of particular concern to KMBS is the proposed removal of protections for pre-1930 buildings, the proposed removal of 'Character Area' status from a large section of Thorndon around Hobson Street, and the proposed ability for 2-3 storey terrace type housing to be built along Tinakori Road, including next to and around KMHG.

We are concerned about the process to date of developing and consulting on the Draft Spatial Plan and the statistical analysis underpinning the plan.

We recognise the Council's need to plan for population growth and respond to housing supply and affordability, but believe the approach outlined in the Draft Spatial Plan is flawed and a fundamental review is required.

1. Background to the Katherine Mansfield Birthplace Society and Katherine Mansfield House & Garden

- 1.1. KMBS owns and maintains the 1888 house at 25 Tinakori Road, Thorndon, Wellington, where New Zealand's most famous writer, Katherine Mansfield, was born. It is known as Katherine Mansfield House & Garden (KMHG).
- 1.2. KMBS was formed in 1986 to buy the house, restore it to its original state and open it to the public as a house museum dedicated to educating visitors about the life and work of Katherine Mansfield. It is a Category 1 Historic Place on the New Zealand Heritage List/Rārangī Kōrero and one of the only historic houses regularly

open to the public (six days a week, 10am-4pm) in Wellington. It is recognised as significant not only to Wellington and New Zealand but also to the Pacific Asia region, winning a Gold Award from PATA (Pacific Asia Travel Association) in 1993.

- 1.3. Since opening in 1988, KMHG has received over 80,000 visitors and become an integral feature on the itinerary of a visit to Wellington. Approximately 40% of its visitors are international and come to explore not only the house where Mansfield was born but the wider area in which her stories were set and where many features of her stories remain.
- 1.4. KMHG offers an insight into: the life and work of Mansfield; the role of women in colonial society; the role of servants in the colony; the life of the early middle class in Wellington; a Victorian childhood; a Victorian-styled garden; colonial architecture and the sophistication of 19th-century New Zealand furniture makers.
- 1.5. KMHG also has a changing programme of exhibitions, some of which are conceived to develop a greater understanding of Mansfield and others which are to support and encourage the creative community which finds Mansfield a source of continued inspiration.
- 1.6. Public programming, the funding and organisation of a Wellington secondary schools' short story competition, and a writer's residency all contribute to KMHG being embedded in the cultural life of the capital city.

2. Katherine Mansfield and Thorndon

- 2.1. Thorndon, the inner-city Wellington suburb in which Katherine Mansfield House & Garden is situated, is known for its mixture of Victorian working-class, middle-class and upper-middle-class houses. In Mansfield's words: "Tinakori Road was not fashionable; it was very mixed. Of course there were some good houses in it, old ones, like ours for instance..."
- 2.2. With her family, Mansfield lived in two houses other than the birthplace in Thorndon. Both of these were demolished in the 1960s, one as part of the Wellington Urban Motorway development. A memorial to Mansfield gifted to the city by her father was also demolished as part of the motorway development.
- 2.3. Mansfield's most famous stories include a suite which are based in Wellington: 'At the Bay'; 'Prelude'; 'The Garden Party'; 'The Doll's House' and 'Taking the Veil'. 'A Birthday', an early story, re-imagines a birth like her own at 25 Tinakori Road. 'Prelude' describes leaving 25 Tinakori Road for a house in Karori. 'The Garden Party' is set in another Beauchamp home at what was 75 Tinakori Road (before its demolition) and its neighbouring cottages.
- 2.4. By way of example, significant remaining features include:
 - Little George St with "... the little cottages...in a lane to themselves at the very bottom of the steep rise ... True, they were too near. They were the greatest possible eyesore and they had no right to be in that neighbourhood at all." ('The Garden Party')
 - The zigzag at the foot of Tinakori Road where a young girl and her brother "stride like one eager person through the town, down the asphalt zigzag

where the fennel grows wild and on to the esplanade ... the wind is so strong they have to fight their way through it, rocking like two old drunkards” (‘The Wind Blows’)

- 2.5. Mansfield’s Wellington stories reveal the nuances of a middle-class family in colonial Wellington, the relationships within the family and with neighbours of all social classes, and the surrounding physical and natural environment.
- 2.6. Mansfield’s work has never been out of print since her death in 1923 and the Katherine Mansfield Society (KMS), an international literary organisation, holds an annual conference and publishes an annual academic journal analysing her work.
- 2.7. Her significance as a Modernist writer grows in stature and many writers both past and present cite her as an influence and inspiration. International examples include Virginia Woolf, Daphne du Maurier, André Aciman and Ali Smith. Closer to home there is Witi Ihimaera, Kirsty Gunn, Nina Mingya Powles and the 50 years of Katherine Mansfield Menton Fellowship recipients.
- 2.8. Artists working in other artforms also continue to find inspiration in Mansfield, including painters and musicians. For example, in February this year an album of 12 Mansfield poems interpreted by leading contemporary New Zealand musicians was released. At their concert of 10 May 2019, Scottish rock duo The Proclaimers shouted out to the crowd by way of introduction: ‘We got off the plane in Wellington and got a taxi straight to Katherine Mansfield House...Hope you’re proud of her - she’s a [expletive] creative genius.’

3. The Mansfield experience in Thorndon

- 3.1. As stated in 1.3, prior to the current border closure, 40% of visitors to KMHG were international. Literary tourism has long been popular, but is an internationally growing trend.¹ Visitors to KMHG get to see not only Mansfield’s birthplace, but the streets of Thorndon around it which provide important historical context and insights into her writing (see 2.3-2.4 above).
- 3.2. KMHG also has a supportive and enthusiastic national and local following. In 2018 Hamilton Gardens opened the Mansfield Garden, which reimagines the setting of ‘The Garden Party’, and visitors to KMHG from outside Wellington now regularly mention that they have visited the garden. Here in Wellington, places on two sessions of a ‘Katherine Mansfield’s Thorndon Guided Walking Tour’ for the 2020 Wellington Heritage Week quickly sold out and KMHG events and activities are always well-attended.
- 3.3. Thorndon has already done much of the heavy lifting for Wellington’s development: the motorway devastated half of it and Molesworth Street is now a monument to high-rise building in what was an inner-city mixed-use residential/low-rise commercial street.

¹ Ferreira A., Alén E., Liberato P., Liberato D. (2020) ‘Literary Tourism: A Cultural Trip?’. In: Rocha Á., Abreu A., de Carvalho J., Liberato D., González E., Liberato P. (eds) *Advances in Tourism, Technology and Smart Systems. Smart Innovation, Systems and Technologies*, vol 171. Springer, Singapore. https://doi.org/10.1007/978-981-15-2024-2_44

- 3.4. The proposed changes to central Wellington, and more specifically Thorndon, in the Draft Spatial Plan risk further devastation and irreversible loss of built heritage and the corruption of the environmental context of KMHG.
- 3.5. These changes would mean 25 Tinakori Road could eventually have no context or linkages – a bit like an adopted child who doesn't know its birth family.

4. Concerns regarding Draft Spatial Plan

- 4.1. Of particular concern to KMBS is the proposed removal of protections for pre-1930 buildings, the proposed removal of 'Character Area' status from a large section of Thorndon around Hobson Street, and the proposed ability for 2-3 storey terrace type housing to be built along Tinakori Road, including next to and around Katherine Mansfield House & Garden.
- 4.2. We are concerned about the process to date of developing and consulting on the Draft Spatial Plan and the statistical analysis underpinning the plan.
- 4.3. We question the basic assumption of having to accommodate 80,000 more people in Wellington in the next 30 years. The amount of housing required is unrealistically inflated. It has been designed to meet the highest possible growth in population, which is not feasible. Almost all the additional housing required could be built under existing rules. It is a 30-year Plan but requires development in heritage areas from day one, which may never be needed.
- 4.4. We recognise the Council's need to plan for population growth and respond to housing supply and affordability, but believe the approach outlined in the Draft Spatial Plan is flawed and a fundamental review is required.
- 4.5. We support finding ways to increasing the housing supply and make housing more affordable in Wellington, but such development should be phased (so that it first takes place in areas which need regeneration) and planned (so the Plan does not give rise to low quality, inappropriate development in the wrong places).
- 4.6. The COVID-19 global pandemic means we are living through a time of major change, which may have long-lasting effects on the way people live and work. Having seen the possibilities and benefits of working from home, more people may choose to do so more often, which may mean central city office buildings become available for residential repurposing. It would seem prudent to pause, review and re-evaluate before committing to such a major overhaul of Wellington's town planning.
- 4.7. We are aware of and support the submissions of the Thorndon Society, the Mt Victoria Historical Society, Historic Places Wellington and the international Katherine Mansfield Society.

Yours sincerely

Nicola Saker

President, Katherine Mansfield Birthplace Society Inc.

From: Onslow Residents Community Association <onslowcommunityassn@gmail.com>
Sent: 05 October 2020 17:04
To: BUS: Planning For Growth
Subject: Onslow Community Residents Association Submission on the Draft Spatial plan
Attachments: ORCA Submission on Draft Spatial Plan 2020 FINAL 5.10.2020.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue Category

Dear planning for growth team,

Please find attached the submission from the Onslow Residents Community Association. This submission has been made following public meetings with approximately 250 people in attendance. We have completed close to your deadline even though we have been given an extension as we sought this for our community not just ourselves.

We request that you make a week's extension available to our residents so you can get the best possible feedback on the plan. The Mayor met several who were unaware of this consultation even on Saturday morning.

We wish to make an oral submission to the Council also.

Regards,

Lawrence Collingbourne
President ORCA



ON SLOW RESIDENTS' COMMUNITY ASSOCIATION

Submission of the Onslow Resident's Community Association for the Our City Tomorrow: A Draft Spatial Plan for Wellington City

The Onslow Residents Community Association represents the areas of Khandallah, Broadmeadows and Kaiwharawhara. Our purpose is to act as a conduit between the community and local authorities, represent the views and interests of our three communities, promote, develop and improve the public services and facilities for our community and foster a sense of community. We are a voice for our community.

Overview

The Onslow Residents Community Association is pleased to make a submission on the Draft Spatial Plan for Wellington City. This is based upon discussion with our residents at two public meetings with a total of 250 residents in attendance.

We do not support the spatial plan as it is currently presented, as it is little more than a zone plan with building heights identified. It does not meet the needs of the city for affordable housing, yet would significantly damage the quality of life for residents in our suburb. We want to see greater diversity in the cities architecture, but we do not want to see a one-size fits all approach to the different character suburbs in the capital.

We also wish to make an oral submission.

We will first make some general comments and then focus on the key questions in the submission documents. Finally, we will present recommendations for action for consideration by the Council.

Limitations of the Spatial Planning Process

We believe that the spatial planning process is flawed and does not provide our residents with a reasonable opportunity to become engaged or to make submissions.

Last year's consultation on the growth scenarios was seriously flawed and is not a valid baseline for the Draft Spatial plan, because:

1. Last year's planning for growth scenarios contained significantly lower-density proposals for the outer suburbs than that contained in this year's spatial plan, i.e. "town houses and walk-ups" with an illustration of a two-storey town house in Khandallah
2. The question asked of submitters were leading questions that were biased towards preferred answers, e.g. "I support continuing to protect character *even though it means* more people will drive and produce carbon emissions."

We therefore disagree with the idea that the preferred option is up and not out.

The Covid pandemic and general election campaign significantly interfered with our ability to consult our community. Only one pop-up kiosk meeting was offered in Ngaio for the Onslow Ward. At our public meeting on 23rd September there was no representation from officials. Several residents

expressed the view they had not been notified of such a major consultation directly. Following this meeting, more residents have had to organise a second public meeting for 30th September. During a walkabout with the mayor on 2nd October, we met further residents who were unaware of the spatial plan.

This lack of formal notice to all residents has not provided sufficient time for submissions to be well thought through and made on time.

There is no formal document that describes the draft spatial plan. The plan information is contained in a computer programme hosted on the Council website. This information has changed significantly during the consultation process, with new and changed information being added throughout, and we cannot compare the new and changed information with what was published at the start of consultation.

We therefore have insufficient confidence that what is presented can be well understood by our residents prior to making a submission.

Limitations of the Draft Spatial Plan

The Spatial Plan sets out to deliver five major outcomes: our city tomorrow will be Compact, Resilient, Vibrant and prosperous, Inclusive and connected and Greener. However, in practice the only quantified information in the plan is zoning, demolition, parking and building heights. The rest comprises general statements of intent, such as “quality development”, without specific detail. Therefore no evidence of how these outcomes will be achieved is quantified in the plan.

On the contrary, the draft spatial plan is not based on accurate quantification of:

1. It's cost
2. The population growth - as the statistics are based on 7-year old data, the upper number only has a 10% probability, and the distribution has not been extrapolated from 2020 onwards, but merely shifted right to allocate a past growth projection into the future in error; a more correct total population growth range would be 8,640 to 76,560, with a most likely growth of 44,760, while the numbers for Khandallah are much lower than those used in the plan..
3. The development possible under the current District Plan. This is understated as no account has been taken of the increased density of current consenting practice and the lowest of the possible development analysis scenarios has been chosen; for Khandallah even the corrected total growth required in the plan (which we don't accept) is 1,140 dwellings, and the average of the five scenarios estimated in the HBA under the current district plan is 1,151. This demonstrates that no change to the District Plan is required in Khandallah.
4. The densification that will result from the change in heights proposed in the draft spatial plan, as all future dwellings forecasts are derived directly from the population growth required through an occupancy ratio
5. The transport required to move the additional population growth or its capacity
6. The infrastructure required to support the densification proposed, as it is only for 3-waters, is out of date, and uses lower density scenarios for Khandallah
7. The economics / pricing of the new developments, to show that such development is economically possible and will result in more affordable homes
8. The education capacity, which does not reflect that Khandallah schools are zoned and full
9. The recreational and social needs of the proposed growth, which have not been analysed against current provisions and capacities, i.e. sport, gyms, shops, open space, leisure activities, child care, dining and entertainment
10. The effects of Covid-19 in redistributing the working locations of residents, which have not been analysed, such as now requiring access to more local amenities when working from home

11. The economic development required to find employment for the proposed growth, which would determine that it is sustainable.

We support the need to find more affordable housing and to retain multi-generational communities within Wellington City. However, we find that the spatial plan contains no strategies of how this will be achieved, nor does it stage development over the 30-year period. The Spatial Plan is therefore not a plan; it is only a proposal for rule changes.

The strategy implied in the plan, as far as we can discern, is that private sector developers will use the relaxed controls to purchase existing properties, demolish them and replace them with a larger number of dwellings. It is self-evident that this will fail to deliver the primary goal. To purchase existing residential dwellings is costly, demolition is costly, building high in Wellington is costly and building limited numbers of units is costly. We suggest that affordability comes from cheap green field or brown field sites at scale and construction that uses factory-built units.

We understand that the experience of Christchurch was, that to make more affordable housing possible, significant amounts of green field land were released across the region by multiple territorial authorities, with infrastructure costs covered by central government and massive funding from insurance and government to regenerate the city centre.

The experience of the Wellington region is that merely increasing building heights, such as in the inner city, does not result in affordable dwellings and nor does allowing green field sites to be developed piecemeal at one-dwelling per section. Or put simply, capitalist developers deliver profit not social outcomes and manipulate land-banking and release of new properties to control price.

[Answers to the questions in the submissions questionnaire](#)

Answers to compulsory questions:

1. We disagree. For the central city, we understand the desire to allow heights to increase as significant sites become available. We disagree with the strategy to increase its boundaries into current residential areas to allow piecemeal development. This will significantly impact current residents. The value of their streets and properties must be retained for their benefit and should only be changed by direct sanction from them. We ask that the Council acknowledges that the inner city is everyone's town centre. We need it to be accessible, which it currently is not. We need parking services and an effective transport policy to connect it to the suburbs as well as an economic development blueprint to maintain its vitality as part of the vision for Our City Tomorrow, not just a spatial plan.
2. We strongly disagree. For inner suburbs, the scope for intensification is limited by their already dense development. We disagree with the spurious protection of current fault lines in Thorndon as these are tens of kilometres deep, so their surface impact is across entire suburbs. The Council should be doing due diligence on ground-vulnerability across the inner city, not on fault-line proximity. Current reality is that all high-rise residential development is significantly constrained by strength, foundation isolation and insurance constraints that will only get more expensive over the 30-year period. The character protection is totally inadequate.
3. We strongly disagree. For outer suburbs we will discuss the specific issues in the spatial plan for Khandallah in the next section, although these apply to Ngaio and Crofton Downs and possibly elsewhere.
4. We strongly disagree. We believe that the distribution must be staged and focused on specific areas where residents welcome the greater height and density, and that this will be close to the inner city and the major southern corridor, not in the outer suburb where residents have specially chosen a different character. Greater use should also be made of the greenfield sites and new ones should be found.
5. We strongly disagree. For character areas in the inner suburbs, we strongly disagree to reduction in character classification where properties are well-maintained, such as in

Thorndon; the entire street-scape and heritage suburb character must be protected and the building height limited.

6. We strongly disagree, as we believe that the character of the inner suburbs will be damaged and few affordable homes will be developed due to economic constraints.
7. Please see our comments about Khandallah in the next section.
8. Our only comment is that the Johnsonville heritage railway is not a rapid transit system as it does not meet the definition in the NPS-UD, see the next section.
9. We strongly disagree, as we have already stated the plan does not show how these laudable goals will be achieved.
10. We don't need to consider Covid-19 to tell what we value; it is in the next section.
11. Although not asked, we strongly disagree with the plan for developing the green field sites. It is vital to maximise the opportunity sites to create affordable housing for our City. Wellington is currently a micro-city and will remain a compact city as these are developed. In particular, the Aotea and Whitby style of development is shameful as it does not promote inclusiveness, diversity or vibrancy, and it pollutes the environment. As previously stated, we believe last year's consultation was seriously flawed. We urge the Council to see the primary opportunities for achieving affordable housing through these sites as well as large brownfield sites that may exist elsewhere. Therefore new opportunities need to be addressed. Specifically, we ask that the Council takes a unified planning approach to these large sites and requires that diverse housing of similar densities to those in the rest of the city, with corresponding amenities and connectedness, are achieved in a sympathetic way. As the Council believes there is significant demand for greater heights and densities, then planning these from scratch will attract buyers and deliver inner-suburb style vibrancy, which residents choose rather than have imposed on them against their choice, for example at Hobsons Point in Auckland. By leveraging central government funded infrastructure the development of the City can follow that of Christchurch's redevelopment at affordable cost to the Council. By doing this the Council can forecast a significant increase in the number of dwellings achievable across the 2,600 sections as well as find more sections elsewhere.

Specific submission on Khandallah

Khandallah is characterised by being one of the premier suburbs in Wellington for character and value through its highest amenity status, as found in the DLC expert testimony last year. In particular, its residents value:

- Its green open spaces and connectivity to large areas of reserve and native bush
- The vistas across the suburb's hills from every street
- Its large setbacks and partial frontages that bring the greenery of its gardens into every street scape
- The sunlight, quiet and privacy afforded to most dwellings
- Its recreation and cultural facilities, medical centre, library, pharmacy, supermarket, town hall, schools, sports and social clubs.

Current concerns among residents include:

- Road safety at key junctions
- Parking along key transport corridors
- Congestion from motorway overflow and at school times
- Lack of transport dependability of buses and trains
- The ageing of the village centre requiring sympathetic development.

Many residents believe that Khandallah is heritage in the making, with numbers of families having invested over generations in its development to make it what it is today. Khandallah is not merely a stopping place on the journey of life, it is our turangawaewae, our place of belonging.

In this context, the wholesale removal of shading protection, reduction in set-backs, increase in site coverage, increase in built frontage, reduction in mature vegetation and masking of outlooks implied to allow the significant density and height increases in the spatial plan are unacceptable.

The assertion that our heritage branch railway is a rapid transit system is simply ridiculous. Its layout has changed little since it was built in 1879 and it was found to be obsolete in 1937 due to its single track, steep gradient, tight curves and narrow tunnels, none of which have been substantially altered in the years since. The reality is that over the week, the trains run 2-3 times less frequently and take 50% longer in time than the buses. Given the buses already run on dedicated bus lanes to the south of the city that could be extended to the North, they are the real rapid transit system to Johnsonville. Yet they are not designated as such in the draft spatial plan. In any event the heritage railway capacity cannot be extended to meet the Council's target by more than a nominal amount.

There is no case whatsoever of more than 3-4 storey development in Khandallah. This should be with the walk-ups and town houses proposed last year, with sympathetic protection of the suburb's outstanding character and value, through careful planning on a location-by-location basis in conjunction with and reviewed by the local community.

The search for affordable housing in Khandallah is a pipe dream due to its high property prices and difficult terrain, as we demonstrated on the Mayor's walkabout. The plan's focus should be to provide sympathetic development of a greater variety of property that supports multi-generational families continuing to invest in the amenity of the suburb, particularly in the central village area.

What we like about the Spatial Plan

We like the goals of the spatial plan, but we don't see any evidence that the material content of the plan, its zoning and height limits and reliance on private development, will achieve these goals.

Recommendations

We offer the following recommendations to the Council:

1. That Council amends the 50,000 – 80,000 population growth figure to the most likely figure as required by the NPS-UD, using the calculation we identify in our submission.
2. That the Council completes the pre-work required for a spatial plan to show that it is economically, politically and socially feasible and will deliver the outcomes the community wants across all areas of wellbeing, including infrastructure, transport, education and amenity.
3. That Council take a measured and staged approach to the planning of developments because of their impact on character, amenities and health and safety.
4. That Council amend the maximum build height in the plan for inner and outer suburbs to three storeys and only higher if one storey can be built into the terrain.
5. That the spatial plan should maximise the building of affordable housing in major green field and brown field sites due to the economic constraints of development in our capital city
6. That no high storey apartment blocks be consented as in-fill development because they will infringe on the character, streetscape and create parking issues.
7. That the Council pushes back against the NPS-UD requirement to remove off-street parking requirements as these have been rescinded in overseas developments, and instead that it fulfils its obligation under the NPS-UD to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.
8. That it become mandatory for Council staff to notify all residents of the street and adjoining streets if and when an application is made for a multi-storeyed apartment
9. That the Council adheres strictly to the District Plan and no longer accepts "less than minor" clauses in applications to circumvent its own guidelines.

10. That the Council engages in joint planning with the Architects and local community residents to formulate and define quality development for each suburb.

Conclusion

Thank you for the opportunity to make a submission. We will also be sharing this submission with the residents in the affected areas as well as in ORCA's communications with its members. Please feel free to contact our association at onslowcommunityassociation@gmail.com or by phone on 021 750 633 regarding this submission.

Yours sincerely

Lawrence Collingbourne, President on behalf of

Onslow Residents' Community Association

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16274

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Organisation Name: FIT Wellington

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

Design quality, not age.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Access to public transport, Public/shared spaces, Access to cycleways/routes, Walkability within the centre, Easy walking distance to the centre

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Shops and businesses, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

N/A

What amenities or facilities were missing or could have been improved?

N/A

Non-Compulsory Questions**1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?**

Increased density

2. What would you change or improve?

More focus of growth around a confirmed Mass Rapid Transit Route

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

A confirmed Mass Rapid Transit Route

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Agree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Neutral

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Neutral

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Strongly Disagree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Strongly disagree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

Climate change, Sustainable Transport, Housing affordability.

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

Climate change, Sustainable Transport, Housing affordability.

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Stongly Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? Yes

Our City Tomorrow: A Draft Spatial Plan for Wellington City



WCC Draft Spatial Plan Consultation

FIT (Fair Intelligent Transition) Wellington Submission - 5 Oct 2020

FIT believes that key to how the city allows for increases in its population are decisions about Mass Rapid Transit (MRT): this will be the major determinant for the design of the Golden Mile (GM) and the final Spatial Plan for Wellington City and its surrounding suburbs.

LGWM should urgently confirm their proposed MRT route and the locations of the stations. This will give developers and the communities around them certainty.

We believe that light rail is the best and most proven method of solving Wellington's transport problems. MRT along the quays will potentially get rid of 2/3 of the current number of buses cluttering the GM - this will completely change the way that the GM can be designed i.e. for people, not for cars.

FIT suggests that WCC adopt a strategy of Density Done Well and embed this in the Spatial Plan. Density Done Well requires 3 strands, all essential:

- **Transport density:** adopt the LGWM strategy for the Ngauranga-to-Airport corridor to "move more people with fewer vehicles" city-wide, enabling more people to "live local". The transport equivalent of medium density housing is mass rapid transit. Key to the effectiveness of the route is allowing it to be 'rapid' avoiding highly pedestrianised areas such as Courtenay Place and instead going down Taranaki St through the heart of the Te Aro development area (also avoiding the Basin Reserve in the process).
- **Housing density:** promote medium density, medium height residential and commercial development in areas where there is higher transport density and in suburban town centres. To ensure that density done well, WCC needs to look at things such as Design Review Panels or selected lists of highly skilled design teams to ensure quality developments.
- **Ecological density:** promote development which reduces emissions and increases biodiversity eg. more green spaces, parks, native trees and shrubs, restored wetlands, on site handling of the three waters, urban food production and food waste composting, beehives etc. within the city.

We would like the opportunity to speak to our submission.

FIT (Fair Intelligent Transition) Wellington

<https://fitwellington.org>

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID **15970**

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Matthew Tucker

Suburb: Crofton Downs

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

The reality of balancing intensification off against the character of inner suburbs is not the perfect measure. Intensification needs to happen, part of that intensification needs to focus on community creation.

The less well off need an opportunity to call a place home, to be involved in a suburb and for that to happen there needs to be a realistic chance for people to buy, own or rent at a price that is realistic.

In some ways this is like climate change, you need to focus on the long term benefit for Wellington, both the city and its people, you are elected to make decisions for the long term benefit of Wellington, my concern is with this process that the voices of people that want to maintain the status quo, don't want their house impacted or what they have changed, will outweigh the reality of those 80,000 new people to the city.

You cant keep growing 1/4 acre sections into the green spaces!

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Access to public transport, Public/shared spaces, Commercial activity (retail,cafes, local businesses), Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Infrastructure (stormwater, water supply, wastewater)

Other: create a process that incentives useful community facilities and areas for people to hang out, not dark soulless places. Dont let the market determine the lowest common denominator for buildings and spaces, but also reward good developments.

8. What amenities would you want to see around future mass rapid transit stops?

Shops and businesses, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other: Motorbike parking, but specifically high density 4/5 story intense building around every rail hub in the network.

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Looking at the likes of Club K/Squash facility, Tennis courts, bowls in Kelburn, this is a prime area that is currently not being fully utilised.

Yes there is a history and these areas are used by some in the Kelburn community, however 20,000 plus students attend the University across the road, a community facility could easily be developed to meet the needs of the student community, long story short a vibrant and diverse student community creates a vibrant and strong Wellington City.

The squash space is essentially allowed to run a commercial gym at the facility. I can't imagine that the intention of the town belt was for this purpose.

Also, can the trains be transitioned into the 2000s, their ticketing is archaic! We all know this, anyone that has used a train knows it. the council needs to tell the regional council to do better!

What amenities or facilities were missing or could have been improved?

Crofton downs train station is an example of suburbs that are failing to create both an environment for a community and sustainable density for a train network.

There is a Mitre 10, petrol station and a large supermarket with a small cafe and pharmacy. You can do better!!!

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

That you are proposing a change, the status quo or something similar to the status quo is not going to work.

2. What would you change or improve?

Suburbs can be created that have both high-density housing and which have that community component.

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

I think there need to be specific measures to ensure housing is affordable. We will never run out of housing, we are just running our of affordable housing.

4.

5. Use your controls to ensure that specific housing is built, i think you should include provisions for high-density student housing, close to the university. That will drive to the market to create the apartments for current and future students. Yes i know rich people live in Kelburn and wont like that, but thats why we have you, to make the important decisions.

6. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Neutral

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Neutral

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Disagree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Neutral

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Strongly Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Not sure

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

No

11. If you answered yes to the question above, what types of assistance would help landowners?

Planting

Other: Motorbike parking, but specifically high density 4/5 story intense building around every rail hub in the network.

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16070

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Organisation Name: Wellington City Youth Council

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

We support the comprehensive and detailed assessments undertaken by and on behalf of Council to assess character across Wellington make sure that we keep the character that add significantly to Wellington but also recognise that as the world around us changes, Wellington also has to change. We cannot afford to stand still.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Social services and community facilities

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Parks and playgrounds, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.)

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

-

What amenities or facilities were missing or could have been improved?

-

Non-Compulsory Questions**1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?**

Youth Council's full submission outlines our views.

2. What would you change or improve?

Youth Council's full submission outlines our views.

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

Youth Council's full submission outlines our views.

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Agree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Agree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Stongly Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

11. If you answered yes to the question above, what types of assistance would help landowners?

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? Yes

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Draft Spatial Plan Submission To Wellington City Council

October 2020

We would like to appear in person to support our submission

Contact person:

Ella Flavell, Chair
Wellington City Youth Council

c/o Wellington City Council
PO Box 2199, Wellington 6140

Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke

Introduction

1. The Wellington City Youth Council (Youth Council) welcomes the opportunity to submit on the Draft Spatial Plan for Wellington City.
2. Youth Council supports the Draft Spatial Plan's five core goals, and how these have been used to create a direction for the future of the city.
3. Overall, Youth Council wishes to identify some priorities which need to be maintained across the city through the Draft Spatial Plan and its subsequent implementation.
 - a. The central city has high importance for younger generations - this area is the space where we learn, socialise, and relax. Although development in the outer suburbs is important, a thriving central city needs continue being the focus of development.
 - b. Working towards a zero-carbon future is of particular importance to Youth Council. To achieve this future, we support the Draft Spatial Plan's focus on public transport hubs, ensuring that these hub are accessible and well developed to reflect the population growth of the city.
 - c. Designing a future city which reflects the diverse communities which call Wellington home. These designs include having a variety of housing options, such as a mix of townhouses and apartments, and a range of sizes and bedroom configurations. The Plan must accommodate groups which may not reflect the typical family to reflect the range of groups seeking accommodation in Wellington City.
4. Younger generations such as students and young professionals often experience the bottom-end of the housing market through lower-quality flats and rentals.
5. We expect that the quality of housing in Wellington will improve over time for future generations by removing blanket demolition protection clauses and encouraging increased density of housing through new builds which meet sustainable and resilient housing requirements,.
6. It is the people that make Wellington the special and desirable city that it is. Although it's important to maintain aspects of the physical character of Wellington, this character needs to be balanced with the needs of our people present today and into the future.

7. By planning for our future with people at the core of the process, we are able to ensure that the community Wellingtonians have come to know and love is maintained, and future generations are not blocked out of our city due to inaccessibility of housing.

Central City

8. Young people in Wellington often spend most of our time in or near the central city. Central city growth needs to be a key focus as our city grows to enhance this experience. and Youth Council sees the Draft Spatial Plan capturing this focus.
9. The changes proposed ensure a resilient, vibrant, and connected future for Wellington. Although there are minimum heights in some areas, a maximum height doesn't mean all buildings **will** be this tall, and the changes that could occur won't happen overnight, allowing for continued community input as the changes occur.
10. Youth Council sees that the proposed increased maximum building height to 10 storeys in some parts of Te Aro fits with the current people-focused atmosphere and would keep the area consistent with its current usage. Increasing building heights to 6 to 8 storeys around the edges of the city, specifically in Aro Valley and Mt Victoria, allows a smooth transition from town to inner suburbs. These areas would become key areas for those interested in living near central Wellington but who don't want to live completely in town.
11. Shifting part of Thorndon from low and medium density to medium and high density allows the suburb to become more cohesive to the central city. The area highlighted on the online map tool includes several schools and embassies, rather than purely being a residential space. Youth Council see the proposed changes in this area as an opportunity to better connect Thorndon to the central city.
12. Youth Council strongly supports the maintenance of current building heights along the waterfront, especially due to the reliability of reclaimed land and the threat of sea level rise. Keeping the waterfront as it is will protect and enhance the current waterfront atmosphere.
13. Youth Council would like to see an emphasis placed on good design of medium and high-density housing. This emphasis needs to include supporting and enhancing sustainable and pleasant architecture.

14. Integrating green and recreational spaces across Wellington, connected to new developments, is an important area of focus..
15. Incentivising private investors to incorporate green spaces into their new builds is something Council should include in their planning, due to the limited availability of green spaces and pocket parks in the central city,. This integration of green spaces would allow the benefits of intensification in the central city without losing access to green spaces as the city develops.

Inner Suburbs

16. The inner suburbs are areas that allow for a balance between convenience, price, and lifestyle for those living there. Youth Council supports the encouragement of medium density development, and therefore the increase of the maximum building height of 4-6 storeys for areas that are not character sub-areas. We believe that this medium-density focus will ensure that housing is as accessible as possible while maintaining the light, space, and character of these areas.
17. It is important to Youth Council that this increase in affordable medium density housing doesn't come at the expense of housing quality and fostering a strong sense of community. We are glad to see that this balance between higher levels of housing, coupled with a focus on high-quality dwellings, has been taken into account.
18. Youth Council also supports the removal of mandatory on-site parking requirements, as this removal aligns with our vision for a zero-carbon future and allows for a more efficient use of space.
19. It is vital that a strong public transport system is in place to ensure that both current public transport users, such as youth, along with future public transport users living in areas further out, are able to get to the city for recreation and work.
20. Youth Council is very much in favour of the increased height limit for building development along transport routes, which will support the convenience of public transport in our future and encourage the use of public transport more generally.
21. Maintaining the vibe and feel of a suburb is important to Youth Council. Therefore, we generally support the designated character areas within the inner suburbs. We believe it is important to protect some aspects of Wellington's history, and the proposed sub areas are a more surgical

approach to retaining character where it is most important to Wellingtonians, balanced against also allowing options for development in areas where character is not as important.

22. We also like the idea of the ‘character overlay’ areas, as these areas maintain character itself while also allowing for better options for affordability and modernity of our inner suburbs.
23. Safe and affordable housing is a high priority for Youth Council, as is discussed in more detail in our section on character,. However, we acknowledge that heritage and character add to the vibe and feeling of a suburb. Therefore, we support the proposed changes to character areas and sub areas as we believe that these changes achieve a desirable balance between maintaining the character of an area and allowing for development for the future.

Outer Suburbs

24. Youth Council is supportive of creating suburban hubs in outer suburbs such as Johnsonville and Tawa into secondary urban centres by developing more services and amenities in those areas. Currently, most young people who live in outer suburbs will commute into the central city to hang out with friends as there is a lack of facilities near where they live. Having secondary urban centres which are appealing to young people will improve access to services and facilities.
25. It is important that these centres have services catered to young people such as youth spaces and recreational facilities. The Waitohi library and Kilbirnie recreation centre are examples of facilities in outer suburbs which cater to young people and serve as community hubs.
26. We also support mixed-use development near transport hubs seen in the Type 3 and 4 zoning in Khandallah, Johnsonville, and Tawa. We believe that these changes are a great way to both develop housing near transport stops, as well as enabling more services and facilities in convenient locations. This focus on development near transport hubs helps create secondary urban hubs by concentrating more people near services and transport.
27. We want to ensure that public transport can facilitate rapid growth in the outer suburbs, particularly in the North and West. When developing in suburbs far out of the city centre such as Tawa, there’s a risk that new residents will put more cars on the road. Because of this concern, any development in the outer suburbs must be designed and built with transport

considerations at its core.. We support high density development concentrated around JVL and KPL stops.

28. We also believe that there should be further mass transit developments to keep pace with population growth, with rapid transit, and improvements to the bus and rail networks being a priority. Options such as park and ride should be available for those who choose to live in low-density zones on the outskirts of suburbs.
29. Youth Council values parks, green spaces, and community gardens in Wellington, particularly in the outer suburbs, as they help create an open and community feel. We would like to keep this feel in the outer suburbs. Retaining this vibe could be achieved by ensuring that people can continue to comfortably access green spaces, regardless of how the suburbs grow. By ensuring that these spaces are easy to access, the public is more likely to choose options like walking or catching public transport to these places. This access would be important to help make our city eco-friendly.
30. As young people in Wellington, we see these public spaces as a necessity for the future as citizens of Wellington are more likely to be living in homes with small or no backyards.
31. Youth Council recognizes the need to increase housing, particularly in the outer suburbs where there is often space available to construct additional buildings. We believe that when increasing the number of houses, the aesthetics of these homes will play a crucial role in drawing people to the suburb.
32. We urge a focus on the consistency of building design to be maintained across each suburb. Consistency in the design of these houses will allow the suburbs to retain their unique character.
33. Youth Council recognizes that some people won't be very open to the idea of change, but we believe that increasing housing options and retaining the unique character in each suburb is possible and the best option for Wellington.
34. Youth Council would also like to see affordable and accessible housing for young Wellingtonians. We recognize and support building of additional homes, but we would like this to be done by having more affordable housing. Currently, purchasing a home in many cities is becoming increasingly difficult for young people. Through the building of additional housing, we would like to ensure that housing is affordable for young people looking to purchase a home.

35. Youth Council would also like to see resilient and sustainable housing being built. We believe that this focus is essential in ensuring that people feel comfortable and secure in their homes. We want to ensure that the houses being built are resilient and fit for purpose. Living in Wellington, we believe that resilience looks like building homes that are earthquake safe. Youth Council emphasizes the need for sustainable and resilient housing, so young people can have greater confidence when purchasing a home.
36. We highlight and support the importance of keeping a family-friendly atmosphere for the suburbs. Many of the steps that the Draft Spatial Plan is taking will result in the urbanisation of our currently quiet suburbs. We would like to make sure that during this development, we make sure that these areas are still suitable and liveable to families and smaller children. Many families and prospective families will be looking to move into our city, and we want to make sure that we provide areas in which they can feel comfortable and at ease in.
37. Ideas on how to maintain and enhance this atmosphere is to focus on integrating green spaces like parks and playgrounds into development changes. This integration will ensure that families and kids still have lots of space to play and enjoy in our suburbs. We urge Council to consider families and children when urbanising our suburbs to ensure that they are still cared for in terms of sustaining the family vibe.

Opportunity Sites

38. Youth Council welcomes the potential of development at Upper Stebbings Valley, Lincolnshire Farm, and Glenside West. The development of these greenfield areas and their impact on the overall housing situation will make densification easier, by freeing up land in town centres.
39. Youth Council's primary concern with greenfield developments are their perception as the silver-bullet solution to our housing crisis. We agree with the views of Wellingtonians expressed in the *Our City Tomorrow* project - we need to focus on building up, not out. Additionally, a reliance on greenfield development to solve our housing crisis runs contrary to the spirit of the National Policy Statement on Urban Development.
40. Youth Council is additionally concerned by the potential here for history to repeat itself. Churton Park, being the most recent example of a greenfield development in Wellington's northern suburbs, shows many of the structural flaws such suburbs can have. The suburb lacks adequate provision for

affordable housing and public transport and has failed to protect its biodiversity. Youth Council urges Councillors to consider the tools at their disposal, including zoning, to make the new greenfield developments affordable, accessible, and green.

41. To be clear, Youth Council is not opposed to greenfield developments in general, nor to those proposed developments in particular, but we stress the need for Council to avoid the mistakes of the past by using all the tools at its disposal.

Balancing character with high-quality housing

42. Youth Council recognises that a key issue present in discussions around the Draft Spatial Plan is changes that might alter how “character” is considered in Wellington.
43. Youth Council absolutely supports the continuation of recognising character in Wellington and views the surgical approach to protection is based in evidence that supports and maintains character and also allows for better housing outcomes.
44. We note that there is a clear distinction to be made between heritage and just general character. Youth Council highly values the maintenance of heritage and sees the proposed approach to protecting heritage through a more surgical approach to character more broadly as striking the right balance between protection and progression.
45. Youth Council views the need for additional quality housing in Wellington to be one of the most critical issues facing the City. For Youth Council, the question is less about if we value character or not, but more that if we have to choose between
 - a. an old house without a significant contribution to character, and
 - b. a warm affordable house,

we choose the latter.

46. We support the comprehensive and detailed assessments undertaken by and on behalf of Council to assess character across Wellington make sure that we keep the character that add significantly to Wellington but also recognise that as the world around us changes, Wellington also has to change. We cannot afford to stand still.

47. Character should not be a blanket protection for Wellington in a previous time. Instead, a surgical approach to protecting character and heritage ensures a strong balance between protection and progress. The identified sub-areas in the Draft Spatial Plan make clear that those elements that make Wellington distinctly Wellington are preserved.
48. The quality of housing in Wellington remains of concern, with high rates of damp, mould, and no heating. Analysis of Census 2018 dwelling data shows that Wellington City has the 5th highest rate of houses with no heating in them, with nearly 3,400 houses (4.8% of the total, above the national average of 4.0%). Wellington also has high rates of damp and mouldy houses.
49. Key areas within the current areas defined as Pre-1930 Character Areas have some of the lowest housing quality measures in Wellington. Between 26% and 40% of houses in Mt Victoria, Mt Cook, Newtown, Berhampore, and Aro Valley were recorded as damp, with the 40% recorded in Aro Valley the highest reading in Wellington, and among the highest in New Zealand. The number of dwellings that are mouldy trend in line with dampness. Some areas also show high proportions of houses without heating, with over 20% of dwellings in Mt Cook without a heating source.
50. Youth Council submits that the high concentrations of housing quality issues aligned with some of the current Pre-1930 Character Areas require a more targeted approach to character to ensure that housing outcomes in Wellington support Wellingtonians to live in warm, safe, housing.
51. We highlight that the removal of blanket protections in the Pre-1930 Character Areas does not mean that bulldozers will roll in tomorrow to destroy dwellings in the current area. Instead, the changes proposed take away the arbitrary protection of large areas of Wellington from any changes simply on the basis of being old. Instead, a surgical approach to character, and opening up the potential to change, will ensure that Wellington's housing stock improves.
52. Wellington cannot allow itself to become a museum to yesterday where Wellingtonians remember times over 90 years when the current situation for many remains increasingly precarious.
53. In Youth Council's view, the surgical protections for character in the Draft Spatial Plan properly balance the need to maintain and protect character through an evidence-based approach with the need to allow Wellington to expand, progress, and prosper in the here-and-now.

Conclusion

54. Overall, Youth Council supports the Draft Spatial Plan.
55. We believe that maintaining a focus on the people of Wellington, rather than the physical attributes of the current city, is key to ensuring that the vibrancy and appeal of our capital city is maintained.
56. Youth Council appreciates that there are major balancing acts in play throughout this plan - balancing the focus on the city centre and developing the outer suburbs; encouraging intensification and development and maintaining open and green spaces; retaining the character and heritage of the city and still improving the overall quality of housing.
57. However, we believe that the Draft Spatial Plan achieves this balance and will be able to implement the outlined goals and directions by maintaining a clear focus on people.
58. Without the diverse communities that call Wellington home, the city would lose much of the vibrancy which is core to its appeal. As the city grows, we need to ensure that the ability to join the Wellington community is retained through increased housing availability, which is warm, safe, and dry.
59. This Draft Spatial Plan is for the future generations of our city - the generations who will be living here in thirty years' time. If we wish to ensure that Wellington's appeal is maintained and experienced by future generations, we need to keep people and communities at the focus of planning, rather than maintaining the status quo.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 15628

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Karun Lakshman

Suburb: Johnsonville

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

There is no certainty about the 80,000 figure. In any event, we do not need another 80,000 people in Wellington. On the contrary, we must reduce the existing population. For one, we have already exceeded the capacity for a balance between people vs nature in Wellington - caused by artificially created economic factors such as (for example) the huge rise in tertiary students, partly due to overseas students, as a result of

universities operating as businesses. For another, the increase has led to a deterioration in the quality of life. The future lack of suitable accommodation will act as a natural barrier to any future increase in population.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

Everything. Only a fool destroys his history for selfish commercial gain.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Walkability within the centre

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Landscaped spaces/plantings, Shops and businesses, Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Medical facilities/centres

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

x

What amenities or facilities were missing or could have been improved?

x

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

Nothing.

2. What would you change or improve?

I would put the Plan on hold for at least a year and longer if we have not emerged from the virus-related restrictions, and then re-visit the entire issue.

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

Yes.

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Strongly Disagree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Strongly Disagree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula**7.2 Strathmore Park**

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

Retaining it as public space

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

Keeping in tune with nature.

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Strongly Disagree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [16185](#)

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Anna Kemble Welch

Suburb: Newtown

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

â€¸

The new information released by WCC shows population projections of fewer than the 80,000 people used for this Spatial Plan and they've changed the allocation of numbers in each suburb during this consultation period. The expansive re-zoning for 6+ storeys through ¼ of Newtown's residential streets needs to be removed. It is not justified.

Concentrate on densifying the Newtown Suburban Centre with up to 6 storey apartments behind the historic shopfronts and where semi-industrial and commercial land is underutilised along the transport spine of Riddiford St and Mansfield St. The suburban centre is already zoned for high density with up to 4 storey buildings with no side yards, so increasing the height here will have far less negative impact on neighbours than buildings of that height among 1 and 2 storey homes. Where there are 1 and 2 storey residences next to the suburban centre, the new buildings can step down in height to reduce the impact on them. It will also concentrate the extra people right in the centre where all the services and shops, cafes and supermarket are.

The plan by Martin Hanley and Anna Kemble Welch, Red Design Architects, endorsed by the Newtown Residents' Association, is proof of concept that 2000+ more homes can be built concentrated in the commercial centre of Newtown, which far exceeds the current projections of the Draft Spatial Plan for the whole Newtown area.

In other areas, the under utilised commercial and semi industrial land along Kent and Cambridge Terrace and Adelaide Rd to John St, along the transport corridor, is the first place that should be zoned for intensified high rise housing development.

Increased density in all the residential areas with infill done well, with quality design, at the appropriate scale and height for the neighbours and streetscape. Make it easier to add to the existing housing while having minimal impact on the neighbourhood – allow tiny houses in back yards, making 1 house into 2 apartments, and well designed town house developments at a height that fits the streetscape and doesn't shade the neighbours.

I do not support the rezoning to allow random location of taller apartments or townhouses (above 2 storeys) amongst 1-2 storey homes in the character inner suburbs

The use of the Government's National Policy Statement on Urban Development (NPS-UD) as a justification for 6+ storey high rise in Newtown's residential area is a misinterpretation of the Government's requirements. Newtown does not fit the definition of having an existing or planned mass rapid transit route, just a notion and no route or specific stops have been decided. If it is built in the future it will not fit the definition in the NPS-UD of a permanent rapid transit route largely separated from other traffic.

Within the NPS-UD, exemptions were allowed for as qualifying matters to protect heritage and character areas, but the Draft Spatial Plan has only applied this to small pockets of Newtown housing while other suburbs have greater areas retaining protection. This is very discriminatory.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

â€ The Draft Spatial Plan (DSP) selected only small areas of Newtown to protect that are not representative of the suburbâ€™s history and character. These are a Disneyland version of Newtown - mostly where wealthy merchants built their homes 100+ years ago, not the far more prevalent workers cottages such as Harper St. The more humble homes are loved as much by the people living in them as the more upmarket ones and they contribute as much to Newtownâ€™s character. This selection is elitist, and racist. They are also the areas where the highest concentration of white population live now.

â€ The DSP doesnâ€™t reflect the much greater areas throughout the suburbs of Newtown and Berhampore that Boffa Miskell mapped for WCC as having consistent pre 1930â€™s primary and contributory character value. The areas labeled by WCC as not having consistent character is a mis-interpretation of the Boffa Miskell report. The report outlined where there was inconsistent pre 1930s character but usually that was because there was a school, church, park or Council housing in the neighbourhood. These homes are the neighbouring buffer around these facilities that helps them integrate into the suburb. This is no reason for WCC to say these homes have no value and rezone for 6+storey apartments!!

â€ The Draft Spatial Plan (DSP) is very inconsistent in how different suburbs are treated.

It discriminates against Newtown and Berhampore in applying zoning for up to 6 and 6+ storeys to most of the residential areas, yet these suburbs are a much greater distance from the city than many â€˜outer suburbsâ€™ are. The character and communities of Newtown and Berhampore have been treated very unfairly.

â€ To keep the character of Newtown for future generations, at the very least the areas outlined by Boffa Miskell in their report on consistent character, must retain the existing designation requiring a resource consent to demolish houses built before 1930.

â€ The human scale of the houses and streetscape is very important. Any new houses need to be at a scale and height that fit in with existing homes and the rhythm of the streetscapes, not taller buildings that take away their sun and outlook.

â€ I value the old timber houses with gardens, close together on small sections, similar scale and height, with a close connection to the street, fitting into the landscape. They create a setting that is uniquely Wellington.

Private gardens and trees add to the greening of the city. With Wellington's hills we overlook each other's gardens and can enjoy the beauty they add to our lives. Gardens bring bird life, potential for growing food, environments for bees to flourish, and enjoyment of nature for all ages.

The special character of houses close together in suburbs like Newtown makes it easy for neighbours to meet on the footpath or chat from their front verandah or garden, particularly where very few have garages so everyone comes and goes through their front gate and engages with the community that surrounds them. This community connection is very important for social resilience.

Newtown has evolved a rich social and physical history with a community of people with diversity of incomes, cultures and generational change that has led to a mix of people living comfortably alongside each other in neighbourhoods that are supportive, culturally diverse, resilient, inclusive and interconnected.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Access to public transport, Public/shared spaces, Commercial activity (retail, cafes, local businesses), Walkability within the centre

Other: New apartments providing homes right in the Newtown Suburban Centre.

Densify where it is already zoned for tall buildings that can be built together, right next to each other, close to all the suburb's key ame

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Community facilities (libraries, community spaces, social services, etc.), Child care, Bicycle parking

Other: In close walking distance from the stops in the heart of the Suburban Centre is the place for increased housing, near Newtown's shops, cafes, services and schools.

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

The street and the proximity of houses to the street so neighbours could connect by talking from inside their property to someone on the street.

The town belt for walking and connecting with the wider environment outside the home.

Supermarket and chemist in close proximity to where people live.

What amenities or facilities were missing or could have been improved?

During Level 3 once we were able to get takeaways, coffee etc, more space outside the premises to allow for queueing and picking up orders without being too close to other customers.

During Level 2 more space outside cafes to sit without being close to others.

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

I support the vision of Our City Tomorrow for Wellington to be the most liveable city, to celebrate our unique Wellington way, to be welcoming for all and have more affordable housing. I also support the goals of ensuring a compact, resilient, vibrant an

2. What would you change or improve?

â€¢ The narrative of the Our City Tomorrow vision and the 2 dimensional mapping of height changes in the DSP do not fit. The rezoning for high rise in Newtown and Berhampore goes far too far. The real repercussions will be the opposite of these goals. Allowing out of scale high-rise in existing 1 and 2 storey residential areas will lead to less resilient communities, less inclusive and connected, and a less green Wellington. Out of scale infill will have a very negative impact on well functioning urban environments.

3.

4. â€¢ I would remove the DSP blanket solution of rezoning for high rise buildings imposed on 1 and 2 storey neighbourhoods that has no regard for good urban design, no consideration of the typography nor understanding of the vibrant community. This approach will not lead to good outcomes in quality place making or strong communities.

5.

6.

7. â€¢ Remove the proposed re-zoning in the Spatial Plan mapping that would allow medium and high rise among existing 1 and 2 storey homes in Newtown and Berhampore.

8.

- Remove proposed zoning for 6+ storey buildings in Newtownâ€™s residential streets, remove 6 and 4 storey zoning across the rest of Newtown and Berhampore, also remove 3 storey infill amongst 1 and 2 storey houses.

9.

10.

11. â€¢ Retain the existing pre-1930s character protection and demolition controls in residential Newtown and all other inner suburbs.

12.

13. â€¢ Make it easier to achieve increased density done wellin the existing suburbs, at the right scale and height to fit the neighbourhood, with quality control by architectural review panels on the design of all new multi unit housing and infill housing. Newtown is an inclusive suburb and has a track record of supporting well designed infill when it fits into the neighbourhood.

14.

15.

16. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**
 â€¢ WCC should engage proactively with communities such as Newtown and work collaboratively with the community to find the best solutions for increased housing density in their local area.
17. - Do not dictate a blanket solution that has no regard for good urban design, no consideration of the typography nor understanding of the vibrant community.
18. - Do not leave town planning and urban design to the decisions of profit-motivated developers. This will not lead to good quality environments or affordable housing.
- 19.
20. â€¢ A phased approach is needed with a short term and medium term view that allows evaluation and adaptation over time.
- 21.
22. â€¢ Itâ€™s a huge mistake to make widespread extreme height and zoning changes now for a 30 year projection of population increases based on data that is very changeable, that has been hastily consulted on during a pandemic, when society is evolving â€“ rapidly changing how people live, work and commute.
- 23.
24. â€¢ The draft Spatial Plan does not consider the negative environmental impacts and carbon footprint of demolishing existing homes and building new:
25. - Newtownâ€™s 1 and 2 storey timber dwellings are resilient and have survived 100+ years of earthquakes, storms and pandemics while many new 6+ storey buildings in Wellington have had a lot of damage in earthquakes.
26. - The existing old houses built of native timbers represent a great deal of embodied energy and sequestered carbon. Many have been adapted and upgraded over time, which is more environmentally sustainable than replacing them.
27. - Demolition and new building, particularly high rise, is very carbon intensive. This is in direct opposition with the WCCâ€™s Te Atakura â€“ First to Zero policy on sustainability
28. - Tall buildings amongst existing 1 and 2 storey neighbours will create environmental problems including shading homes and gardens, and causing wind tunnels and downdraughts. Shade will make neighbouring houses damp and cold, reducing the quality of living and affect the health of occupants of all ages in these neighbouring flats and homes.
- 29.
- 30.
31. â€¢ I donâ€™t think consideration has been given to the impact of displacing the existing residents of Newtownâ€™s high density close together houses and replacing them with people who can afford a modern apartment in a high-rise building. From the Our City Tomorrow, Inner Suburbs, Newtown and Berhampore description: "They are also quite diverse, with Newtown in particular composed of more Maori, Pasifika, Asian, Middle Eastern, Latin American and African residents than the city average. Three quarters of the population living in these suburbs rent, which is much higher than many other parts the city."
32. Where are these families and immigrants going to live? Will they have to move out of the city when the homes they live in are taken over to build high-rise apartments for young urbanites and wealthier older people?
- 33.
- 34.

- 35.
- 36.
- 37.
- 38.
- 39.

40. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Neutral

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in

this area).

Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

Engage with the community to find the best solutions for more homes to merge into the local environment. Do not dictate a blanket solution that has been mapped with no regard for good urban design, no consideration of the typography nor understanding of

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

As above.

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Planting

Other: In close walking distance from the stops in the heart of the Suburban Centre is the place for increased housing, near Newtown's shops, cafes, services and schools.

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

â€ The use of the Government's National Policy Statement on Urban Development (NPS-UD) as a justification for 6+ storey high rise in Newtown's residential area is a misinterpretation of the Government's requirements. Newtown does not fit the definition of having an existing or planned mass rapid transit route, just a notion and no route or specific stops have been decided. If it is built in the future it will not fit the definition in the

NPS-UD of a permanent rapid transit route largely separated from other traffic. The resultant rezoning for 6+ storey highrise through 3/4 of Newtown's residential area on the grounds it would be walking distance to a mass transit stop needs to be removed.

I have attached the plan by Martin Hanley and myself (Anna Kemble Welch), Red Design Architects, showing that it is feasible to achieve more than 2000 new homes in the suburban centre and along the transport spine of Newtown, which would provide the opportunity for more than 3 times the new housing required in this suburb over the next 30 years without building highrise among the existing residential area.

Newtown and Berhampore being designated as Inner Suburbs when they are much further from the City Centre than many Outer Suburbs is only because of the line drawn in 1840 designating where the town belt would be. It is not relevant in an exercise like this when walking distance and ease of access to the city is a major criteria. - see attached map.

I would like to make an oral submission in support of my written submission.

Have you provided an attachment? Yes



Key
Newtown Suburban Centre
and Commercial Zoning

Currently zoned for 4 storey buildings, built to the property boundaries

With a 5m set back buffer to adjacent Residential Zones



Key

Newtown Suburban Centre and Commercial Zoning ———

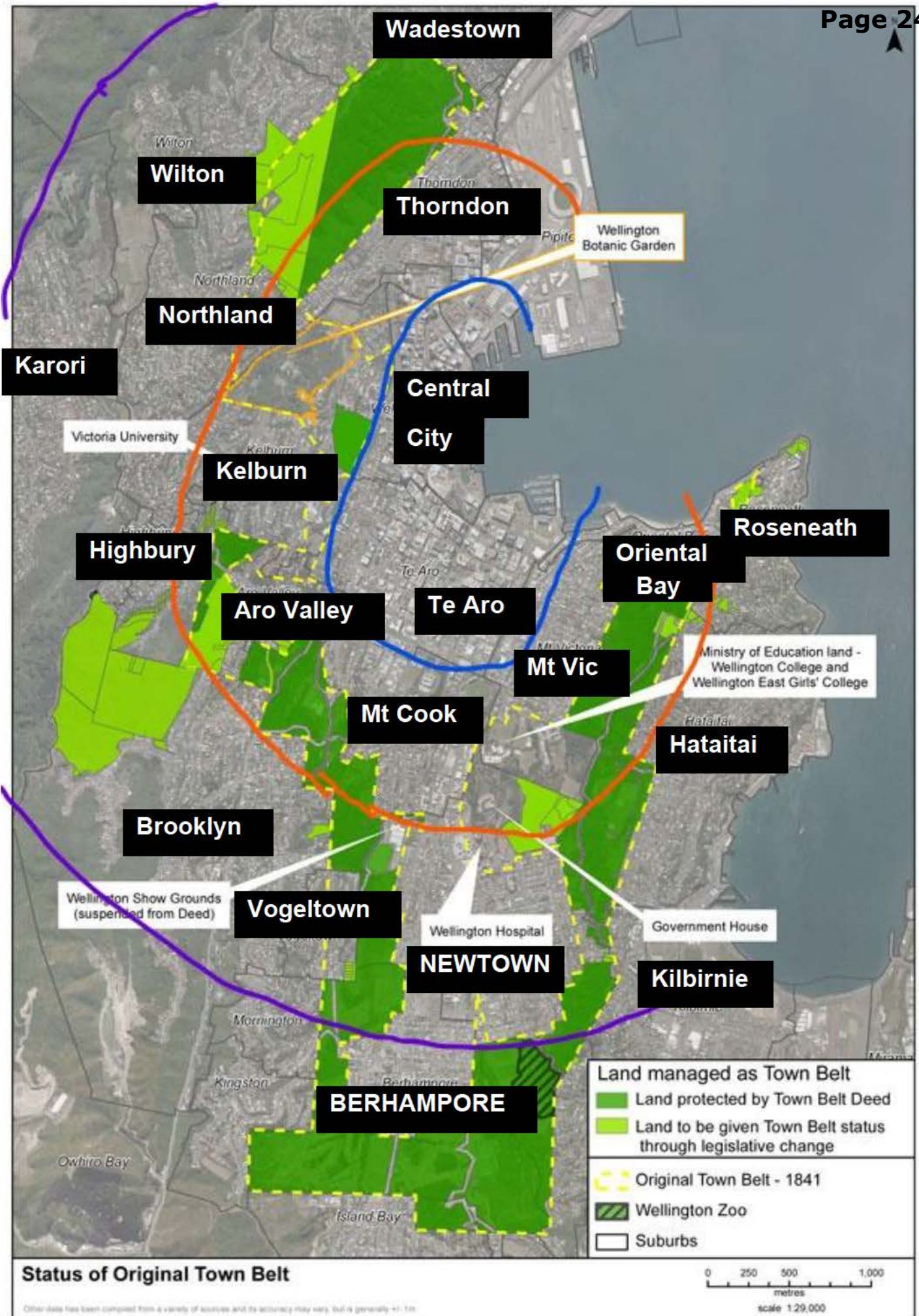
New Home Types:

- Two apartment units per floor**
= 12 homes on 6 storeys
= 10 homes on 5 storeys above shop / cafe
Each 84sqm apartment has windows on at least 2 opposite sides for sun and outlook
- Two apartment units per floor**
= 6 homes on 3 storeys
- Co Housing Apartment Complex**
= 20 homes on 5 storeys above shop / cafe
With open space & some shared amenities
- Town House Apartment Complex**
= 70 homes on 5 storeys above shop / cafe
= 56 homes on 4 storeys above shop / cafe
With central shared open space

Where new apartments are set back from the street it is to preserve character shopfronts and to allow more sun and light at street level

Mapping where over 2,000 homes could be built in the next 30+ years





Proximity of Suburbs to the Wellington CBD (Wellington Central & Te Aro)

The “Inner Suburbs” are simply within the original Town Belt. “Inner” is not related to distance from the CBD. Newtown and Berhampore are the only 2 “Inner Suburbs” that are outside the orange ring sketched above. They are further from the CBD than Kelburn, Highbury and Northland which are technically “Outer Suburbs”.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16121

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Rosalind McIntosh

Suburb: Kelburn

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

My disagreement with all the questions above have the following reasons:â€”

1. I oppose the provisions of the Draft Spatial Plan as they apply to the residential area around Wesley Rd.

I notice hidden away in the draft plan maps (under â€œInner Cityâ€, â€œWhat Changes are We Proposingâ€, â€œCharacter Areasâ€) that Council is undertaking further investigations of the area between Kinross Street and Clifton Terrace, bounded by San Sebastian Road, Wesley Road and Bolton Street to determine if they also have special characteristics that should be managed within a Character Area. The case for making this area a Character Area, with which my neighbours agree, follows in sections 2 to 4.

2. While I do not oppose residential intensification generally, I regard Wesley Rd area as one of Wellingtonâ€™s Character Areas of unique qualities and values which merits special attention for protection from demolition and densification.

3. I support the retention of the pre 1930 demolition rule to preserve Wesley Rd areaâ€™s heritage and neighbourhood character

4. The protection of historic areas such as Wesley Rd is a matter of importance for future generations both nationally and in Wellington city.

As far as I can ascertain, Wesley Rd has all buildings built pre-1930, many before 1920, and at least one built as early as 1880. All houses have been maintained well and upgraded with the streetscape of only a couple losing some original character. I anticipate that all houses have retained original wood and many heritage interior features such as high ceilings and elegant wooden detailing.

These houses, in excellent condition, are what remains of the ancient trees of our forest, kauri, matai and rimu making their protection vital. They exemplify irreplaceable lost craftsmanship and gracious internal living spaces of a previous era.

This is Wellington's heritage to be protected for future generations to enjoy and identify with, and what makes this city a place to value and be proud of. Let us protect what works well and is beautiful and mindfully use resources by developing other areas where wasteful demolition is not part of the plan.

5. It is essential that the development of the city be timed carefully so that the rundown, drab areas are developed and intensified first. Otherwise we will immediately lose our special old buildings, streets and landscapes to â€œeconomic,â€ unattractive buildings destroying human spirit while retaining the depressing rundown areas as well.

Wellington could become like so many crammed boring cities I have experienced around the world, losing visual delight and quality of lived experience. There will be increased earthquake risk, loss of human scale, people living on top of each other, a straining for sunlight and views and to avoid wind tunnels. The focus should be on improving public transport and related services to improve the desirability and living standard in the wider suburbs rather than destroying heritage character areas.

6. Recent building scandals and our own private experiences make Wellingtonians rightly distrustful that the private sector can look after the quality of new houses and community developments in any way adequately. Strong laws, regulations and oversight by authorities and citizen coalitions are essential.

7. To avoid protracted wrangling and expensive litigation on densification, WCC should set up neighbourhood inclusive, deliberative citizen juries to design how each area should be developed for intensification just as the city of Seattle has done very successfully, eg <https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first>.

Trust us – we chose this city to live in, have invested hugely in maintaining, upgrading and making delightful our homes and neighbourhoods – the current proposal could permanently greatly undermine our efforts for, and the quality of, future lives in this place.

7. Please note again that I am not opposed to intensification done carefully, to a high standard, overseen well, and guided by all the people of the community most affected by it in a deliberative democracy process. Wellington can do this – our people deserve no less!

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Commercial activity (retail, cafes, local businesses), Employment opportunities, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.),

Other: Planning and budget spending by a deliberative, democratic process including those most affected by these.

8. What amenities would you want to see around future mass rapid transit stops?

Landscaped spaces/plantings, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

The Town Belt and Botanic Gardens.

What amenities or facilities were missing or could have been improved?

Accessible bus service.

Non-Compulsory Questions

1. **What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?**

It is a beginning but it needs much more refinement and co-design in local areas using deliberative democracy processes.

2. It also needs a clear staging of changes to upgrade depressed areas first so that functioning old areas are not destroyed in the init

3. **What would you change or improve?**

Old houses, such as in the Wesley Rd area, in excellent condition, are what remains of the ancient trees of our forest, kauri, matai and rimu making their protection vital. They exemplify irreplaceable lost craftsmanship and gracious internal living spaces of a previous era.

4. This is Wellington's heritage to be protected for future generations to enjoy and identify with, and what makes this city a place to value and be proud of. Let us protect what works well and is beautiful and mindfully use resources to develop other areas where wasteful demolition is not part of the plan.

5.

6. It is essential that the development of the city be timed carefully so that the rundown, drab areas are developed and intensified first. Otherwise we will immediately lose our special old buildings, streets and landscapes to "economic," unattractive buildings destroying human spirit while retaining the depressing rundown areas as well.

7.

8. Wellington could become like so many cramped boring cities I have experienced around the world, losing visual delight and quality of lived experience. There will be increased earthquake risk, loss of human scale, people living on top of each other, a straining for sunlight and views and to avoid wind tunnels. The focus should be on improving public transport and related services to improve the desirability and living standard in the wider suburbs rather than destroying heritage character areas.

9.

10. Recent building scandals and our own private experiences make Wellingtonians rightly distrustful that the private sector can look after the quality of new houses and community developments in any way adequately. Strong laws, regulations and oversight by authorities and citizen coalitions are essential.

11.

12. To avoid protracted wrangling and expensive litigation on densification, WCC should set up neighbourhood inclusive, deliberative citizen juries to design how each area should be developed for intensification just as the city of Seattle has done very successfully, eg <https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first>.

13.

14. Trust us " we chose this city to live in, have invested hugely in maintaining, upgrading and making delightful our homes and neighbourhoods " the current proposal could permanently greatly undermine our efforts for, and the quality of, the future lives of ourselves and others in this place.
- 15.
16. " Please note again that I am not opposed to intensification done carefully, to a high standard, overseen well, and guided by all the people of the community most affected by it in a deliberative democracy process. Wellington can do this " our people deserve no less!
17. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**
Old houses, such as in the Wesley Rd area, in excellent condition, are what remains of the ancient trees of our forest, kauri, matai and rimu making their protection vital. They exemplify irreplaceable lost craftsmanship and gracious internal living spaces of a previous era.
18. This is Wellington's heritage to be protected for future generations to enjoy and identify with, and what makes this city a place to value and be proud of. Let us protect what works well and is beautiful and mindfully use resources to develop other areas where wasteful demolition is not part of the plan.
- 19.
20. " It is essential that the development of the city be timed carefully so that the rundown, drab areas are developed and intensified first. Otherwise we will immediately lose our special old buildings, streets and landscapes to "economic," unattractive buildings destroying human spirit while retaining the depressing rundown areas as well.
- 21.
22. Wellington could become like so many crammed boring cities I have experienced around the world, losing visual delight and quality of lived experience. There will be increased earthquake risk, loss of human scale, people living on top of each other, a straining for sunlight and views and to avoid wind tunnels. The focus should be on improving public transport and related services to improve the desirability and living standard in the wider suburbs rather than destroying heritage character areas.
- 23.
24. " Recent building scandals and our own private experiences make Wellingtonians rightly distrustful that the private sector can look after the quality of new houses and community developments in any way adequately. Strong laws, regulations and oversight by authorities and citizen coalitions are essential.
- 25.
26. " To avoid protracted wrangling and expensive litigation on densification, WCC should set up neighbourhood inclusive, deliberative citizen juries to design how each area should be developed for intensification just as the city of Seattle has done very successfully, eg <https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first>.
- 27.
28. Trust us " we chose this city to live in, have invested hugely in maintaining, upgrading and making delightful our homes and neighbourhoods " the current proposal could permanently greatly undermine our efforts for, and the quality of, the future lives of ourselves and others in this place.
- 29.
30. " Please note again that I am not opposed to intensification done carefully, to a high standard, overseen well, protective of our heritage and history, and guided by all the people of the community most affected by it in a deliberative democracy process. Wellington can do this " our people deserve no less!

31. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area,

investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

What those living there want when they are supplied with appropriate information on possibilities and meetings are facilitated to have a respectful listening deliberation on it in the interests of the whole community.

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

What those living there want when they are supplied with appropriate information on possibilities and meetings are facilitated to have a respectful listening deliberation on it in the interests of the whole community.

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Neutral

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Financial assistance

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

The Spatial Plan is rushed and too generalized. It needs localising carefully with carefully facilitated respectful citizen conversations among ourselves to create buy-in for each of us, and a sense of connection and responsibility for the whole community.

Please see my comments above and in the attached document.

Personally I am very disturbed by the prospect of my sunlight and small view disappearing after investing my savings and time to create a pleasant home for myself and others over years. My home is not an investment, it is where I live, and in its present situation, it is a source of stability and aliveness. With government superannuation as my income, I cannot afford the increases in rates that densification would undoubtedly cause.

Thank you!

Have you provided an attachment? Yes

SUBMISSION ON THE WELLINGTON CITY COUNCIL DRAFT SPATIAL PLAN

Emailed to: planningforgrowth@wcc.govt.nz

- I oppose the provisions of the Draft Spatial Plan as they apply to the residential area around Wesley Rd
- I do not oppose residential intensification generally, but I regard Wesley Rd area as one of Wellington's Character Areas of unique qualities and values which merits special attention for protection from demolition and densification.
- I support the retention of the pre 1930 demolition rule to preserve Wesley Rd area's heritage and neighbourhood character
- The protection of historic areas such as Wesley Rd is a matter of importance for future generations both nationally and in Wellington city.
As far as I can ascertain, Wesley Rd has all buildings built pre-1930, many before 1920, and at least one built as early as 1880. All houses have been maintained well and upgraded with the streetscape of only a couple losing some original character. I anticipate that all houses have retained original wood and many heritage interior features such as high ceilings and elegant wooden detailing.
These houses, in excellent condition, are what remains of the ancient trees of our forest, kauri, matai and rimu making their protection vital. They exemplify irreplaceable lost craftsmanship and gracious internal living spaces of a previous era.
This is Wellington's heritage to be protected for future generations to enjoy and identify with, and what makes this city a place to value and be proud of. Let us protect what works well and is beautiful and mindfully use resources to develop other areas where wasteful demolition is not part of the plan.
- It is essential that the development of the city be timed carefully so that the rundown, drab areas are developed and intensified first. Otherwise we will immediately lose our special old buildings, streets and landscapes to "economic," unattractive buildings destroying human spirit while retaining the depressing rundown areas as well.
Wellington could become like so many crammed boring cities I have experienced around the world, losing visual delight and quality of lived experience. There will be increased earthquake risk, loss of human scale, people living on top of each other, a straining for sunlight and views and to avoid wind tunnels. The focus should be on improving public transport and related services to improve the desirability and living standard in the wider suburbs rather than destroying heritage character areas.
- Recent building scandals and our own private experiences make Wellingtonians rightly distrustful that the private sector can look after the quality of new houses and community developments in any way adequately. Strong laws, regulations and oversight by authorities and citizen coalitions are essential.
- To avoid protracted wrangling and expensive litigation on densification, WCC should set up neighbourhood inclusive, deliberative citizen juries to design how each area should be developed for intensification just as the city of Seattle has done very successfully, eg <https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first>.

Trust us — we chose this city to live in, have invested hugely in maintaining, upgrading and making delightful our homes and neighbourhoods — the current proposal could permanently greatly undermine our efforts for, and the quality of, future lives in this place.

- Please note again that I am not opposed to intensification done carefully, to a high standard, overseen well, and guided by all the people of the community most affected by it in a deliberative democracy process. Wellington can do this — our people deserve no less!

| | |
|---|------------------------------|
| <u>Name:</u> [REDACTED] | <u>Signature:</u> |
| <u>Address:</u> ... [REDACTED] Kelburn..... | <u>Date:</u> ...5/10/2020... |
| <u>Phone:</u> [REDACTED] | |
| <u>Email:</u> [REDACTED] | |

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [16209](#)

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Marian Evans

Suburb: Mount Victoria

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Neutral

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

I can't answer this because your plan is not based on accurate predictions, according to the DomPost today.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

see my submission

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Medical facilities/centres, Walk

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Parks and playgrounds, New housing, Community facilities (libraries, community spaces, social services, etc.), Child care, Medical facilities/centres

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Green areas; beach

What amenities or facilities were missing or could have been improved?

Not sure

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

2. What would you change or improve?

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

6. Thinking about the Lincolshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Not sure

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Weed and pest control

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

See attached file, please.

Have you provided an attachment? Yes

Introduction

I believe that it is fundamental that everyone has an affordable good quality and healthy home within a safe community with adequate amenities and with good transport options (walking, biking, bus).

My comments below are made in the context of the Covid experience and the current climate emergency and as a citizen who has lived in the inner city suburbs for decades. This has offered our family many benefits, so I welcome the idea of providing for more people to live here and this opportunity to comment on the *WCC Draft Spatial Plan* (the Plan). But I find the Plan very disappointing for the reasons I give below, because it reads as though the WCC seeks to support a sub-standard environment for Wellingtonians, that will not enhance our collective well-being. My suggestions towards excellence, with some examples from my own neighbourhood, follow.

Disappointment: What I wish was in the Plan

1. A transparent overall philosophy based on accurate information sourced **before** proposals are made. For example, as reported this morning,¹ only 4731 people are expected to move to the city's inner suburbs by 2050; this is a third of the estimate the Plan is based on and thus requires a focus on a third of its '5400' homes: 1800, which could easily stretch to 2500.
2. Rules to enforce quality, warm, healthy buildings.
3. Rules that address sustainability, adequate space issues, scale and size, green areas, street interface, historical and cultural issues as an integral part of the consent process.
4. Rules that reference and support resilience and wellbeing if residents have to go into lockdown for Covid or a similar virus, if the inner city is affected by problems caused by the climate emergency, floods, fires, rising seas etc or by earthquake.
5. Reference to tourism, especially green tourism.
6. Retention of the sunlight plane requirements so that a) existing buildings cannot expand right up to their boundaries and b) residents - and their gardens - are not deprived of exposure to sunlight.
7. A funding model that supports affordability, for single people, especially women alone, with or without children, for low-income families, for immigrants, for students.

What I suggest

1. Create a transparent multi-dimensional framework that takes into account all the factors I've referred to. Among other factors, the framework should include:

a) Integrate knowledge about significant corridors that the community uses, especially during stressful times caused by Covid or climate change, corridors that visitors to the city also value.

During lockdown, people flocked from Courtenay Place to Oriental Bay and the Town Belt and Innermost Gardens, often along the Lookout Walkway which intercepts with Matairangi Nature Trail, the Southern Walkway and the Hataitai to City Walkway. International tourists did this too (and will again in future) and local tourists do the same.

¹ Cornish, Sophie 'New figures reveal high-rise concerns' *DomPost* 5 October p2



And to use the Lookout Walkway they walk or bike up and down Majoribanks Street, Hawker Street, Roxburgh Street, McFarlane Street and the Hawker Street extension known as the Oriental Terrace zigzag (which has always been part of the Mount Victoria character zone and appears now to have been removed from it without any consultation at all).

Part of the pleasure of this slow travel is enjoyment of the built environment, access to any sunshine and to viewshafts and protection from wind tunnels. It is therefore inappropriate to have three-four storey apartment buildings along any of this route, as shown for example on the plan's Mount Victoria at the very top of Hawker Street, right next to entrances to two well-used pedestrian walkways.

b) Support small and sustainable developments

Many of inner-suburb properties exist in a small land area but have space for smaller infill solutions that enhance sustainability. Why not support experiments with the new consent-free 3mx3m structures, to see what one or two linked structures could provide, with composting toilets (which WCC was experimenting with), water supply via emergency tank topped up from mains when necessary, a grey water system for gardens and solar panels for energy? These could provide both small homes for the many single people who want them and resources in times of emergency, when the usual services are not available.

c) Integrate historical and cultural factors

The WCC's Heritage Policy states that:

The Council works to identify and protect the city's heritage places to help retain them for future generations...Wellington celebrates its past through the recognition, protection, conservation and use of its heritage for the benefit of all.

But, for example, the suggestion that three-four storey apartment buildings be permitted at the top of Hawker Street places this possibility right in the heritage St Gerard's precinct, hard up against a treasured building with a treasured park in front and with much-loved and unspoilt groups of old villas on its other two sides.² How does this protect a heritage place? No other major city in the world would make a similar suggestion, because it would compromise enjoyment of a major landmark.

Mount Victoria is full of more recent history, too, which should be taken into account. Sylvia Haden wrote about some of this back in 2002.

The Mount Victoria elements of her story (including the Hawker Street extension) are now layered with more heritage places: the house where the Flight of the Conchords lived; houses where well-known journalists like Rosemary McLeod and Pat Lawlor lived; the house where Keri Hulme's Booker Prize winner *the bone people* was published; the houses where the women of The Women's Gallery lived. And much more.

² I've written a history of this area here: <https://medium.com/@devt/this-is-the-house-that-joe-built-2c769e2c88cf>, including the WCC's Character review that resulted in the area losing its status within the pre-1930s Demolition Rule (section: Planning Decision Based on Errors of Fact)

READERS' COLUMN

City needs nooks and crannies

YOUR SHOUT

HAVING spent some of my growing-up years in Oriental Bay in the early 1970s, I now find it painful to see the rapidly changing face of what was once a charming, picturesque place full of nooks and crannies and wonderful places to explore, marvellous Edwardian homes and Gothic mansions fit for a Munster.

There were always the wealthy, but it was the kind of unshowy wealth that didn't mind living next door to a houseful of rowdy hippy students. One dowager paid me 20 cents a time to walk her toy poodle. There seemed to be famous people everywhere. Talented, arty types with interesting, quirky homes.


The bus of the Blerta Band, whose drummer was Bruno Lawrence, was often parked outside our place. The occupants would scale the steep path to the "zigzag", where Downstage Theatre founder Harry Seresin lived. A couple of houses down from him was actor Martyn Sanderson.

I was in the same class as their children at school, but I had no idea at the time that some of these people would become New Zealand icons. Sanderson's daughter was in the Crunchie Bars television ad with the train and indians, and that impressed me a lot. I still look out for her in it.

There were the "characters", too ... Rene, the glamorous male hairdresser who had two Afghan hounds and a gorgeous girlfriend. A rumour went around that she was actually a he. A case of sour grapes, I think; the old man with the club foot who muttered suggestively and called all the young women darling. My mother never trusted him; hushed talk of a brothel at the top of Hay Street ...

The man in the dairy had a toupee perched on top of his head that was a completely different colour from the rest of his hair. He was so trusting that you'd often go in to buy something and no one would be in the shop. Not a mirror or security camera in sight.

There was a darker side, too. Broadcaster Murray Forgie lived behind us, and one night he was badly



Former Oriental Bay resident Sylvia Haden fears for the bay's future, without protection to preserve its heritage.

beaten and nearly killed on the street outside our house. We didn't hear his cries because someone was revving a motorbike to stifle them.

I was fascinated by an Edwardian apartment next door. The elderly woman occupant had become ill some time before we moved there, and she had been put in


a home. Everything had been left as it was. The crockery was out and the furniture intact in that eerie, mysterious place. It was like something out of a Charles Dickens novel. I spent a lot of time gazing in through the windows, dying to get in there and explore.

It stayed that way the whole time we lived there. No one broke in and disturbed it. It may even be the same now.

Oriental Bay was a vibrant, friendly, magical place to live. Thorndon is protected to preserve its heritage. Why can't the same be done for Oriental Bay? Do we want to turn it into a corporate-monied, tacky cousin to Australia's Gold Coast, full of showy, tasteless apartment blocks where you never see anyone go in or come out? It will be a sad loss for everyone if this metamorphosis continues unchecked.

A city needs its nooks and crannies.

● Your Shout is Contact's readers' column. We welcome your ideas, stories and opinions. Length limit 600 words. Your Shout, Contact, PO Box 3740, Wellington; fax 474 0155; editor@contact.co.nz.



Are You Ready To Be Revived?

Escape the winter blues and head to the heart of the beautiful Wairarapa. Our **Champagne Reviver** package includes:

- ☑ Two nights accommodation for two in a deluxe room
- ☑ Cooked breakfast

d) Provide a funding model that supports affordability

The Plan doesn't provide any guidance on affordability and inclusion.

If developers want to build multi-storey blocks in the inner city, could they be required to include some social housing within each development? Mount Victoria is enhanced by the presence of the Women's Boarding House. If a developer is building say six apartments could at least one of them be given to a social agency to manage?

Affordability is also contingent on demand and supply. Since Covid, there are more people working from home. There will probably be more commercial buildings available for conversion to homes. How can the WCC make this happen?

e) Integrate climate emergency factors

WCC's own map shows the central city's vulnerability to rising seas. How can this concern be integrated in to the Plan?



Conclusion

I hope my suggestions encourage the WCC to engage more fully with the issues that concern me and many others, to develop another, more integrated Plan. To engage their imaginations so that more of us can be housed, more affordably and safely and warmly, and without loss of environmental values that enhance everyone's wellbeing.

Generation Zero's Submission to

Wellington City Council:

Our City Tomorrow, draft spatial plan.

Submission by: Generation Zero Wellington

Date: 5/10/2020

Contact Person: Eleanor West

Email: eleanor@generationzero.org.nz



1. Our 'high level' asks for the Spatial Plan

When we think of a future Te Whanganui-a-Tara Wellington this is what we see, experience and feel (outcomes):

- a diverse range of affordable and healthy homes are provided in the central, inner and outer suburbs
- it is easy and affordable to get around regardless of the mode of transport we chose and our accessibility needs
- most of the services we need on a day-to-day basis is within a 20 minute journey of the places we spend most of our time (home and work)
- a diverse range of businesses that contribute to a flexible economy exist across Wellington
- the city is resilient to sea level rise and other natural hazards, including those that will increase in intensity due to climate change
- our local communities and groups are supported by providing them with a diverse range of places to meet and carry out the work they do
- Māori culture and heritage is enhanced across the city recognising and respecting the past, present and future
- a developing heritage, accepting that change is inevitable while ensuring we maintain connections to the past.
- a diverse range of green and blue spaces that support biodiversity and meet people's needs
- our local native biodiversity is enhanced and the city provides a safe way for them to come in.

We would like to appear in front of Councillors to support our submission, whenever that may be via video link

Table of Contents:

| | |
|--|-----------|
| Our 'high level' asks for the Spatial Plan | 2 |
| Our dire housing situation (Our housing situation is dire and the Spatial Plan provides a good opportunity to address this) | 4 |
| Why we strongly support the spatial plan | 5 |
| Central City | 5 |
| Inner Suburbs | 7 |
| Outer Suburbs | 11 |
| General | 12 |
| Our response to some of the criticisms of the Spatial Plan | 12 |
| Implementation of the Spatial Plan | 14 |

2. Our dire housing situation (Our housing situation is dire and the Spatial Plan provides a good opportunity to address this)

Unaffordability

Wellington is in a housing affordability crisis. For decades, the council has banned densification in places that people want to live. Character areas, excessive building rules and low maximum heights have all meant that it is incredibly difficult to densify Wellington City. Consents have tracked well below the level of building required to meet population growth, replace old housing stock and provide adequate competition.

The result is clear. House prices and rents have exploded, eating up a majority of people's incomes. Low-income individuals have been priced out of the city, and have no option but to go to the Hutt Valley, Porirua and the coast where some house building is allowed. Wellington is now at a stage where we not only have to plan for significant future growth but addressing the artificial increases in house prices over the past few decades. As outlined below, supply is the primary driver of this unaffordability crisis.

Health

Wellington also has a housing quality crisis. Very little competition between landlords, little ability to undertake new developments to replace ageing stock and land prices eating away money for higher quality materials all contribute to this state of affairs. Wellington's housing stock is cold, damp, mouldy and draughty. Many renters and even owner-occupiers suffer from cold winters and housing-induced respiratory illnesses. We are one of the only countries in the OECD that consistently reports outbreaks of rheumatic fever - our housing is the cause of this problem.

Choice

Much of Wellington's housing stock was design for living patterns 100 years ago. Big families with the need for backyards. In today's context, that means overcrowded flats and a scarcity of smaller places to live. Many people do not want to pay for a backyard, or large decks when many suburbs have ample green space nearby. The lack of choice also hits older people - there are very few downsized options that are not apartments in the inner city. This all contributes to space being used inefficiently.

Accessibility

Our city's has a shameful record on accessibility. Only a tiny fraction of houses are suitable for the many people in our community with physical disabilities. The Spatial plan ought to cater for all people, and have a commitment to all new builds being accessible. Key to note is that the Spatial Plan is the best chance for reengineering our

city towards a kinder, more accessible society: but the Plan *must* commit to accessible design in principle and not leave it up to the district plan.

Emissions, biodiversity and infrastructure costs

The blocking of any meaningful development in a growing city means only one thing - that development is occurring elsewhere. Porirua, Hutt Valley and the coast all have sprawled to accommodate people priced out of the city unnecessarily. Homes being pushed further north on productive farmland and beautiful open space is detrimental to our biodiversity. Those communities also have little ability to lead low-carbon lifestyles, requiring a car, long commutes and carbon intensive infrastructure to service them. Allowing more development in the city, close to workplaces and existing amenities will create an urban form that helps reduce carbon emissions.

Social cohesion and building communities

The status quo is more gentrification of existing suburbs and uncontained sprawl. The people that make this city diverse, interesting and vibrant are slowly being priced out of their communities. Sprawling suburbia locks in car dependency and leads to communities with little connection to their places of work, school or whanau.

Who does this impact?

The housing crisis has gotten to the point where even middle-class wage earners on good income are paying half their income in rent or mortgage payments. The situation for young people, poor people and those often discriminated against in rental accommodation is dire. Many see no opportunity to find an affordable rental, have a reasonable commute or ever own a home. Meanwhile, existing homeowners reap the rewards of capital gains and high rents.

3. Why we strongly support the spatial plan

Generation Zero strongly supports the Spatial Plan as it delivers a more dense urban form than the alternative. Medium and high density housing are key to reducing carbon emissions caused by car dependent, greenfield commutes. There is a strong evidence base for the benefits of dense urban form and the impacts on climate change mitigation.

Central City

We support increasing the minimum building height to 6 stories, and the maximum building height to at least 10 stories in the inner city as this will significantly increase the development capacity of Wellington, enabling more housing and commercial spaces to be built. We would support buildings of more than 10 stories if the conditions allow the building to be structurally sound.

We strongly support integrating the Centres zoned area bordering Adelaide Road between Rugby Street and the junction with Riddiford Street into the Central City area zone as these areas are within easy commuting distance of the CBD, and are along the proposed mass rapid transit route. The city should be focusing development in this direction because it is an area with good ground conditions for building and is at reduced risk of sea level rise.

We also support integrating identified Thorndon Inner Residential zoned properties into the Central City area zone as these areas are also within easy commuting distance of the CBD, and are along the proposed mass rapid transit route. However the council needs to ensure this zoning is consistent with sea level rise predictions and climate modeling.

We should not be investing development into areas at high risk to storm surges where future investment will be required for managed retreat. There is a high carbon cost of building on less resilient land where buildings won't survive their potential life span.

Generation Zero would support rezoning the lower section of Aro Valley to be included in the Central City area as well as this area is in easy walking distance of the CBD and would be well suited to higher density development.

The plan proposes *“development of guidance to encourage better apartment design, particularly around the size and usability of internal space and amenity considerations such as access to natural light and outdoor living areas.”*

This needs to include a strong focus on designing for accessibility, with requirements that ground level apartments apply universal design to ensure there are more homes available for people with disabilities in the inner city.

We agree that access to natural light is important for the wellbeing of occupants, but do not agree with any justification that this is *necessary* to keep homes warm. Building to higher passive design standards can ensure warm, dry homes with less direct sunlight than is the desired norm at present.

We support the plan to identify a range of distinct neighbourhoods in the central city if this is for the purpose of neighbourhood scale master planning with community codesign to ensure people have easy access to key amenities, like school, shops, green space, within their suburb.

The plan has identified anchor sites, like the Te Ngakau precinct , as areas of resilience to concentrate development around. However, several of the sites are very close to the waterfront and we'd question what level of consideration was given to the sea level rise risk and earthquake resilience of these sites - is it worth encouraging investment in these areas that are at high risk to Climate Change?

Inner Suburbs

Character Areas

We strongly support re-focussing pre-1930 character controls on designated sub-areas within the Character Areas that exhibit a cohesive streetscape character, and removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been.

Reducing the size of the Character Areas to focus on well-preserved sections while allowing homes in poor condition to be redeveloped. This will provide more homes close to employment, transport, recreational activities. Generation Zero would support further refining these Character Areas as the current proposals for reduction are not sufficient to allow the equitable development we need in our city.

At the movement there are approximately 5,500 pre-1930's houses that can't be demolished without resource consent. These homes represent a massive equity issue for the city, as they are extremely unaffordable, many of them are in terrible condition, and are occupied by renters who have limited housing options.

The high cost of demolition consents restricts development and forces people to live in these buildings that are making them sick as they often do not have any other choices. It contributes to the in-affordability of housing in our city, forcing people to move out of the city, taking real character with them.



Image description: a dilapidated house, typical of the housing quality in the current character areas.

We do not agree with the criticisms of other organisations that this plan will result in an immediate demolition of large sections of Wellington’s “Character” and replace it with slum-like poor quality high density housing that ruins neighbourhoods for the following reasons:

Even if developers don’t need a resource consent to demolish an old home, they will still need a building consent for whatever they propose in its place. At this stage the council can impose strict building quality and streetscape rules that will be set as part of the District Plan review in 2021. These can be used to ensure high quality design that is architecturally suited to the environment.

Reducing the cost of development by removing the requirement to apply for a demolition consent means developers will have more resources available to invest in higher quality design.

People who own well-maintained character homes that deserve to be protected are unlikely to sell these homes to developers. It is the poor quality homes that will be targeted for development.

The primary purpose of houses is to be homes for people, *not* museum/art pieces. At the moment many of these houses are not serving that primary function and the fact that so many of them have not been improved to modern standards to date, suggest they're unlikely to be improved in future. Placing a higher value on aesthetics than the well being of the residents of character homes is unethical.

Owner-occupiers in these areas tend to be the most affluent members of our society. It is inequitable to allow these suburbs to escape density requirements and push those on to less affluent parts of the city.

The current definition of "Character" by many of these groups, and often by Wellington City Council, is almost entirely focused on colonial heritage in the form of pre-1930s villas. For the capital city of Aoteroa, this stance is frankly completely unacceptable.

The level of resourcing that has gone into the identification, classification, and protection of these character areas is deeply concerning considering how little resource has been invested into doing the same for the heritage and taonga of mana whenua, and of the natural heritage of our city. Taking a protectionism approach to colonial buildings does a disservice to our treaty apartments under Te Tiriti o Waitangi.

Identifying sites of significance for Maori is not enough. The Spatial Plan needs to make a commitment to highlighting, enhancing, and protecting these sites to the same degree they have done so for the current Character Areas. Anyone should be able to walk down a street in our city and know that they are in Whanganui-a-Tara in Aotearoa which means we need more investment in decolonising our built environment. We need more investment in spaces like Te Aro park.



Image description: Te Aro Park, Dixon Street, Wellington.

Natural heritage is such an important piece of Wellington's character and so unique to cities in Aotearoa - we should be making the most of this taonga and investing more resources in enhancing this rather than the colonial heritage. Mount Victoria has value as Tangi Te Keo, an important maunga for our city, rather than a museum of old houses that aren't adequate homes.

An important part of enhancing our natural heritage is investing in the three waters infrastructure. We would like to see greater emphasis on water sensitive design in the planning of the city, and believe the Spatial Plan should include plans to daylight more of Wellington's streams where possible.

Natural heritage is important for people's wellbeing, especially in a denser more compact city where people have less private outdoor space. Under the status quo, zoning limits incentivise single storey subdivisions which infill garden spaces. With height restrictions lifted there is more incentive to provide communal green spaces and it provides planning rules that allows more sharing of green spaces.

Density

We strongly support encouraging density in the inner suburbs by increasing building heights to at least 6 storeys within a walkable catchment from the central city to enable more housing and mixed-use development close to the central city and is consistent with the NPS-UD.

We support restricting building heights in character sub-areas and gradually increasing these in the buffer zones, however we think that the character sub-areas and surrounding buffer zones are too large and should be further refined. These areas are so close to the city and ideal for equitable-density.

We support amending specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed, and enabling the modernisation of older homes. Again, the council needs to introduce controls for accessibility, with requirements that ground level homes apply universal design to ensure there are more homes available for people with disabilities in the inner city.

Outer Suburbs

We support the proposals to upzone building heights along transport corridors in the outer suburbs to encourage higher density. More affordable housing in these suburbs would provide an injection of people to rejuvenate the suburban centres and strengthen their local economies, providing greater amenity and making the suburbs more livable to a greater range of people.

We support the plan for the outer suburbs for the most part, however would like to see some amendments:

Kelburn should be re-zoned as an inner city suburb and up-zoned accordingly. This suburb is very close to the inner city and should be developed to a higher density, especially to support the student population who would prefer to live closer to Victoria University if the housing was more affordable.

Some re-zoning in the plan is a bit blunt. For instance, in Miramar only the industrial areas have been raised to 6 stories whereas we believe other parts of this suburb could support higher density as well. The lot sizes up-zoned across the city are often too small for them to realistically be developed.

Similarly for Island Bay, where only the shops have been up-zoned. This suburb could support far higher density as it has strong public and active transport links and lots of available space.

The council needs to ensure there is strong master planning for the outer suburbs that accounts for general livability, community facilities, and transport connections. They need to ensure that these suburbs are a viable option for people with disabilities to live

in as well, by ensuring accessible housing is built, and applying the accessible journey to ensure people who live there can access the shops, transport, a route to the inner city etc.

Generation Zero would like the council to halt development of unsustainable communities in green-field sites in Upper Stebbings Valley & Lincolshire Farm and instead focus on enabling density closer to the city. The city has declared a climate crisis and we cannot afford to be investing money in sprawl when we desperately need people to be living in more compact, low carbon homes.

4. General

- The provision of Water Sensitive Urban Design should be included in all developments. The measures implemented should be determined through a detailed structure planning process.
- When considering green spaces, the Council should consider how it can use them to provide for WSUD and address the urban heat island effect.

Our response to some of the criticisms of the Spatial Plan

Some submitters have said that Wellington's housing is not in crisis. There is an existing housing supply deficit in Wellington. Wellington City Council officers have provided extensive information about how Wellington's housing supply will not keep up with growth.

People who would have traditionally been able to afford to buy a house are renting for longer in Wellington:

- Less Wellingtonians than the New Zealand average own their own home (47.3% for Wellington and 51.3% for New Zealand).
- This rate is low considering that Wellington's average salary is \$85,030 which is well above the \$ 77,799 average salary for New Zealand.
- The median rent in Wellington city is \$440 which is well above the New Zealand median of \$340 per week.
- High rental prices are a symptom of a housing market where supply is not meeting demand.

Enabling density creates more housing supply and makes housing more affordable:

- As at May 2020, the median house price in Wellington region is \$677,510. This is up from \$385,000 10 years earlier. That means that the median Wellington property increased in value by 5.8% each year, or \$29,251 on average.¹
- Trade-me reported in July this year that *“In Wellington city, the average asking price was \$814,850, a 7 per cent increase”*
- The suburb that grew the slowest over 10 years was Wellington Central, which grew at a rate of 3.81% per year. That’s 44.5% slower than the median Wellington house price.
- Wellington's median house price is currently 107.61% of the national median house price.

There is a fundamental supply deficit of housing in Wellington City. This is the catalyst for further housing problems like quality of housing and lack of housing choice. This deficit needs to be addressed and housing needs to be built for Wellington’s future growth.

Some submitters have said that we do not want more growth in Wellington City because we are a large enough city and should be focusing on degrowth. High rents mean Wellington becomes a boring city in a number of ways:

- Wellington should be a city that welcomes new residents. This reflects a city that is tolerant, inclusive and diverse. Cities benefit from diverse populations, and as the creative capital of New Zealand especially, Wellington should provide housing for a wide range of future residents to maintain its character as an exciting and vibrant place to live.
- As a capital city it is especially important that all New Zealanders have the opportunity to live here if they choose.
- This growth will happen elsewhere in the Wellington Region and in the country if it is not planned for in Wellington’s city centre and inner suburbs. This sprawl has a direct impact on carbon emissions, traffic congestion, and how connected communities are.
- Continuing to constrain housing supply through restrictive housing density does not prevent growth, it creates sprawl and unaffordability.

Questions about whether infrastructure works for a densified city:

- Core infrastructure involves both fixed costs and maintenance costs, as well as costs that emerge from a more fragmented system. Sprawled urban development increases all of these costs.

¹ <https://www.opespartners.co.nz/property-markets/wellington>

- Wellington has historically underinvested in core infrastructure like three waters and public transport in areas where density is now proposed. The certainty that the spatial plan provides for where future population will grow, will allow for better future core infrastructure planning by providing economies of scale.
- Density provides benefits for how cities provide goods and services like supermarkets, doctors offices, hospitality and schools. For cafes and bars in Wellington, density provides a massive opportunity to regenerate after COVID-19.
- Cheaper housing costs also provides people with more disposable income to spend on hospitality businesses.

Implementation of the Spatial Plan

1. Once the Council has made a decision on implementing the Spatial Plan the next step will be its implementation. We think that effective implementation is contingent on:
 - a. a District Plan that
 - b. a supportive RM system
 - c. Building Act
 - d. Effective public transport
2. Below we discuss why each of these are important and the actions we think Council can take.

District Plan

3. When developing the District Plan we ask that the Council:
 - a. [come back to this once we know what improvements we want to make]
 - b. ensure that the Spatial Plan is implemented in full. We are concerned that the intent of the Plan could be weakened through the framework set out in the District Plan,
 - c. consider how accessibility can be incorporated into performance conditions and resource consents.

Review of the RM system

4. We request that the Council engages with Central Government as it continues to review the resource management system to ensure:
 - a. that the Spatial Plan and District Plan can be implemented effectively,
 - b. that the tools Council can use to effectively implement these plans is provided in these planning frameworks.

Changes to the Building Act

5. We request that the Council engage with Central Government to encourage it to continue to review the Building Act to ensure:
 - a. buildings constructed align with accessibility requirements,
 - b. people are encouraged to use materials that have low emissions or impacts on the environment.

Effective public transport

6. We request Council continue it's work on a transport system designed for long-term sustainability. It needs to be accessible, safe, equitable, and affordable for everyone.

Submission on the Wellington City Council Planning for Growth - Draft Spatial Plan

Introduction

The Newtown Residents' Association has been an Incorporated Society since July 1963. We are residents and business owners from Newtown and the surrounding area, who take a keen interest in the community and local issues. We are concerned with maintaining and improving our area's liveability, connectedness and sustainability and working to make our community a thriving, diverse, great place to live.

The Association has a history of positive urban design action and active placemaking. Association members led a community based urban design project in the 90's, which has created the very liveable and walkable Riddiford St design. In fact we have a party every year to celebrate this community engagement, the Newtown Festival, still going 25 years later. The first street festival happened as a celebration of that project's completion.

Newtown Residents' Association has also been very engaged and involved with previous developments of the District Plan, and helped to create an urban design guide for the area. We regularly consult on a range of issues affecting the people who live, work and play in Newtown.

Consultation on the Draft Spatial Plan

We want to record our disappointment with the consultation approach to the Draft Spatial Plan.

This is a very important issue and consultation should have followed international best practice for engagement frameworks, where a high impact proposal deserves a co-design and active stakeholder management approach. There was a missed opportunity here. Widespread information about the proposals, perhaps with a letter box drop, posters in public places and advertisements in newspapers, could have been followed by forums and workshops which went beyond informing people about the proposals and gave the opportunity for people with different views to hear from each other and work towards a consensus, as described in *'Want to build high-rise homes for 74,000 more people in Wellington? Build consensus first'* by Max Rashbrooke in The Guardian, 6th September 2020.

In practise, with this consultation, there was very little publicity generated by Wellington City Council, and the public debates that have taken place have been divisive and polarising. The pop-up events and requests for submissions were advertised on social media but only people who already followed WCC would have been sure to see them. As a result there are still many Wellington residents who do not know anything about these proposals. This is unfair given the impact the Spatial Plan will have on the next iteration of the District Plan rules.

Submission

The Newtown Residents' Association supports the need for additional, good quality and affordable housing, but we strongly disagree with the current proposals for Newtown in the Draft Spatial Plan for Wellington City.

Although we oppose the plan in its current form we do acknowledge the negative impact that high rents and the lack of affordable housing have had on younger people and people on low incomes.

- We do agree that we need to densify in smart ways and in the areas most suitable.
- We accept the growth number range proposed by WCC for Newtown and want to look at solutions to house these people.
- We support this problem being addressed holistically at a government level. The National Policy Statement – Urban Development 2020 is a bold urban move, but in this situation it is being used inappropriately as a blunt instrument with little allowance for local conditions.

Our reasons for our opposition to the current Draft Spatial Plan are:

1. It is a misuse of the National Policy Statement – Urban Development 2020 to use it as a reason to enable 6 storey developments in most of Newtown's residential area. The only basis for including Newtown in the NPS is that in future we might be on the route of a rapid transit system, but there is no rapid transit service in existence or firmly planned for Newtown.
2. The ability for developers to pepperpot 6 storey developments amongst existing 1-2 storey housing would have unreasonably negative effects on our suburb. This does not represent good urban design practice, and would not achieve the goal of 'Density done Well'.
3. The Boffa Miskel report '*Pre-1930 Character Area Review*' commissioned by WCC identified a much larger area with a coherent character than is designated a 'character sub area' in this Draft Spatial Plan. We submit that the current protections should remain.
4. There is a much better approach which could deliver a significant quantity of additional housing while retaining character and cohesion in the suburb. We support new development concentrated primarily within the current Suburban Centres zone.

Further explanation:

1. **Newtown and Berhampore should not be included under the NPS-UD2020 rules**

The Newtown residential area has been included in the NPS-UD2020 catchment requiring at least 6 storeys for new developments, under NPS Policy 3 (c) (i) as being walkable from "existing and planned rapid transit stops".

As defined in the policy "rapid transit service means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic." This doesn't exist in Newtown. Although it is talked about it seems to be a

long way from becoming a definite plan, and no route for a future service has been decided. We believe a plan means having decided a route, a timeline in the foreseeable future, and having the funding in place. Even if an enhanced public transport service is provided at some stage in the future it is unlikely that it would be able to be “largely separated from other traffic.”

In the discussion about a possible light rail or other rapid transit service two routes have been talked about - either up Constable St or along Riddiford St, Mansfield St and Roy St then in a tunnel through to Kilbirnie. The Draft Spatial Plan mapping has been done as though both routes are being used, so that the whole area is regarded as within walkable distance from possible future stops. This is not accurate, whichever future route was chosen there would be parts of the area currently designated as subject to these rules which would not be within walkable distance of a stop – particularly so if a 5 min timing was chosen.

2. Apartment blocks of ‘at least 6 storeys’ should not be allowed among low rise residential homes.

This is our main point of disagreement with the Draft Spatial Plan in its current form. In this Draft Plan most of central residential Newtown is zoned for type 4b housing, which allows new developments to be “at least 6 storeys.” A single-minded emphasis on increasing housing density risks losing the very qualities that make sunny sheltered Newtown a great place to live. Computer modelling shows that a single 6 storey building casts shade across a swathe of neighbouring homes. And the loss of sun is only one of the effects, there is also the loss of privacy, and the increased effects from wind deflected off the sides of tall buildings down into neighbouring houses and gardens. If the current plan isn't modified even Carrara Park, Newtown's only community park and playground, could be heavily shaded.

This isn't ‘Density done Well’. If WCC approves of enabling ‘at least 6 storeys’ then no amount of design rules can realistically avoid negative effects when a developer chooses to build to this height. Homes that are warm and dry now risk becoming cold and damp, reducing the quality of life and affecting the health of occupants of all ages in these neighbouring flats and homes.

District Plan Rules

The DSP also foreshadows “Amending specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed, and enabling the modernisation of older, less healthy homes.” This implies allowing new developments to proceed without the rules which currently protect neighbouring properties from effects such as shading and dominance from new buildings.

When the time comes for consultation on the District Plan rules we will advocate for retaining rules ensuring that whenever a property is developed it is designed in a way that avoids significant negative effects on the neighbours. This won't be achievable unless there are appropriate height limits, as well as other controls. We note that even 4 storeys, as allowed for in the type 3 housing zones, is too tall for most of the sites in Newtown.

Environmental Effects

There are also environmental effects associated with demolition and rebuilding. New building, particularly high rise, is very carbon intensive. On the other hand the existing old houses built of native timbers represent a great deal of embodied energy and sequestered carbon. Many have been adapted and upgraded over time, which is more environmentally sustainable than replacing them. Also these buildings are resilient and have survived 100+ years of earthquakes while many new buildings in Wellington have been badly damaged in earthquakes.

It is also necessary to acknowledge that if existing homes are allowed to become shaded then more energy will be needed to keep them warm and dry, and solar panels on these homes will not be able to operate as intended.

Affordability

A key objective for the Draft Spatial Plan is to provide affordable homes. Unfortunately the plan doesn't provide any answers about how this can be achieved. There is also an assurance that the homes will be well designed, and of good quality. Affordability and high quality seem incompatible when left to the market to determine the outcome of what will be built and what it will cost.

One of the arguments for having as much land as possible available for development is that concentrated zoning will put up the price of land. This may be so, but the residential lots that have been targeted are already surprisingly highly priced. In practice, whatever the land costs private developers will sell for whatever the market will bear, and if one lot of land is cheaper than another the expected result will be bigger profits for the developer, not more affordable homes. If the supply begins to outstrip demand then we would expect the developers to stop building and wait until demand increases.

In addition it is very expensive to insure high rise dwellings compared to low rise houses, and body corporate fees to maintain and repair high rise apartments have also become extremely expensive. This all adds to the expense of living in these dwellings.

We value the diversity of Newtown and we are already seeing it slipping away as more townhouses and apartments are built and both old houses and new apartments become more and more expensive. We are calling on the City Council and the Government to work together to use or create mechanisms for underwriting the costs of development and make affordability an achievable goal. We would also welcome an increase in social housing in Newtown, either City or State Housing.

3. Retaining Character Protections

The Draft Spatial Plan says it is -

Continuing to recognise the special characteristics of the broader area and enable opportunities for sensitive, denser development in these Character Areas, by:

- o *Re-focussing pre-1930 character controls on designated sub-areas within the Character Areas that exhibit a cohesive streetscape character.*
- o *Removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been compromised.*
- *Maintaining a continued emphasis on streetscape character in those areas outside designated sub-areas through retention of a general character overlay over these areas to ensure that new development respects the local streetscape and sensitively balances old with new.*

In the DSP Council have removed character protections from large areas of Newtown that the Boffa Miskell report 'Pre-1930 Character Area Review' (commissioned by WCC) said have coherent character. The Draft Plan says WCC are "removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been compromised.", but they have gone much further than that and removed protections from 6 out of 10 areas noted by the report as having coherent or consistent character.

The planners have chosen to protect areas of Newtown that are not representative of Newtown's history and character. Areas in the 'sub character zones' are mostly where wealthy merchants built their homes 100+ years ago, not the far more prevalent workers cottages.

Our strong preference is to maintain all the current protections for pre-1930s dwellings. This doesn't mean banning demolition altogether but it does mean that demolition continues to require resource consent. The new District Plan rules could then be negotiated with agreed standards for the conditions that would reasonably lead to demolition and rebuilding. They could also allow easier permissions for remodelling so that an existing house can become a multi-unit dwelling, or for constructing an additional 'tiny house' on the same section.

We also submit that blanket zoning for Type 2 housing - up to 3 storeys - in character sub areas, and Type 3 housing- up to 3-4 storeys - in other areas, is still inappropriate among one storey homes and should only be allowed when the design rules are sufficient to protect the neighbouring houses from significant negative effects.

We note the DSP assurances about "*Maintaining a continued emphasis on streetscape character in those areas outside designated sub-areas through retention of a general character overlay over these areas to ensure that new development respects the local streetscape and sensitively balances old with new.*" This would be impossible to achieve while such disparities in building heights are allowed.

4 There is an alternative that provides increased housing and the potential for 'Density done Well' in Newtown - concentrate development in the area already zoned 'suburban centre'.

We agree with the need for more housing, and we support increasing density by concentrating taller buildings in our commercial main streets, as outlined in the Newtown Residents' Association [May 2019 submission](#) to the first round of Planning for Growth Consultation.

Martin Hanley and Anna Kemble Welch, who are architects and urban designers, have drawn up 'proof of concept' plans to show that intensification along the main streets, and mostly within existing Suburban

Centres zoning, could provide up to 2,000 or more new dwellings. This far exceeds the current projections of the Draft Spatial Plan for the whole Newtown area – the most recently released figures predict 487-759 new dwellings will be needed, to house 1289-2011 people. Martin and Anna will also be submitting independently on these proposals.

Our Association would prefer the height limit to be 4 storeys in most of this area (as in our original submission) but if 6 storey developments are required they are better situated here than among one and two storey homes on the residential streets. This plan takes care to protect the historic shopfronts by building developments behind them.

'Density done well' usually involves a precinct developed in a coherent fashion. If this could be championed in our Suburban Centre, along with similar development in Adelaide Rd, there is the potential for something quite exciting to emerge. High-quality multi-use developments in the commercial streets would bring vibrancy and opportunities with trade, commerce, hospitality and entertainment at street level and apartments above.

We also support Intensified housing along Kent and Cambridge Terrace and Adelaide Rd to John St, along the transport corridor, densifying on the bus route and reducing car dependency.

When new dwellings are concentrated together it is easier to upgrade the infrastructure to match the increased density, making this a practical solution to one of the major issues with the current DSP.

Conclusion

We support the provision of more and more-intensive housing in Wellington and in Newtown. However this should not be at the expense of the human scale of the existing character low-rise residential areas. A phased approach to the application of this plan needs to ensure that developers cannot start with picking off small areas amongst low rise housing for 6 storey developments. Development should be concentrated initially on the commercial spine of Newtown and on brown field sites that might lend themselves to a more intensive development as has been done recently, adjacent to Mansfield St. As time goes on this could be extended further into the residential streets as the need for this is demonstrated.

We are very keen to work with Wellington City Council to ensure a good outcome for the Council and for Newtown residents.

Thank you for the opportunity to make this submission. We would like the opportunity to speak to Councillors about it in the appropriate forum.

Rhona Carson

President, Newtown Residents' Association

5th October 2020

Individual Draft Spatial Plan submission from Johanna Drayton

I make this submission in relation to the draft spatial plan. I oppose the plan in its current form.

I also record my very serious concern about the lack of clear, accurate information released by WCC and the insufficient consultation period.

I seek that WCC consider the submission regarding unreliable and inaccurate information, carries out further work and extends the consultation period so further thought and amendment to the draft spacial plan can be achieved to obtain the correct balance between increased density, and the environment (in particular character and heritage, sunlight, amenity value, adequate infrastructure).

I have resided at [REDACTED] for decades (since about 1995). I have seen many ugly apartment buildings erected that are leaky (under WCC management and oversight). Most have been substandard bar 1 or 2. I have now experienced first hand the impact of dwellings built out of character – by virtue of my neighbours home which I signed off on thinking that best for neighbourhood relationships and not being able to accurately really understand the look and feel from the plan which was briefly shown to me at the time I was asked to sign off. That dwelling completely breaks the skyline row of historical Victorian houses.

I wish to support sustainable and appropriate, quality development in the appropriate parts of the inner city – such as towards the city street end where there are already apartments, less character and sunlight will not be so impacted. I support retention of a character zone/precinct for Mount Victoria so we do not lose our beautiful architectural history and special character.

There is a better way forward. A pause is required and further thought given to appropriate options that strike the right balancing of the competing interests. At present environmental impact (character, heritage, sunlight, amenity value and lack of infrastructure) has not been properly weighed, and factored, in.

In the draft plan WCC have asked if submitters think this approach offers a good balance between protecting special character and providing new housing. This includes changes to the pre-1930 character areas and the introduction of character sub-areas. I do not believe it does.

The historic housing stock of Mount Victoria and its unique form are used to promote Wellington, not least by Wellington City Council. The suburb is visited and appreciated by New Zealanders and international tourists.

The pre-1930s protections were put in place in the 1980s because of concerns that unrestrained and poor-quality development in Mount Victoria could undermine a significant part of the architectural and social heritage of Wellington city.

Removal of the pre-1930s restricted demolition rule, as proposed by the draft spatial plan, and allowing the building of multi-storey apartments across 62% of Mount Victoria will quickly lead to the loss of an essential part of Wellington's identity and undermine heritage and amenity values of much of the remaining 38% of the suburb. Once these historical buildings are lost, they cannot be replaced. Heritage, character, a unique history lost to future generations – forever.

The proposed character sub-areas create a bizarre jigsaw which will significantly retract from the overall character of the area. They are highly arbitrary and do not achieve the stated aim of protecting the character of Mount Victoria. Many of the proposed character sub areas will be over shadowed and lose sun and views by walls of multi-storey apartments with full-site coverage that will abut protected sub areas. It will also potentially decrease the level of community engagement and spirit in some of Wellington's most diverse suburb.

The draft spatial plan will allow construction of multi storey apartments to occur as-of-right across 62% of Mount Victoria. There will be no requirement for a developer to seek resource consent, and no opportunity for adversely affected residents to have their concerns heard. Residents including myself who have lived many years in the suburb and who care about its unique environment will effectively be disenfranchised. The wider public will also be impacted by the removal and erosion of Mount Victoria's character and history.

A submission is required about WCC's statistical analysis. The proposals in the plan do not seem to clearly correlate to the statistics and rationale contained within the plan. This makes it very difficult to understand and provide feedback on the modelling that was undertaken to inform the design of the plan.

In order to provide more informed decisions, the public and affected persons need access to more of the evidence base that was used to inform the plan and the key assumptions that were made. Carrying forward with the plan in the absence of providing evidence that can be subject to appropriate scrutiny and validation is irresponsible and undemocratic. It is not consistent with the legislation.

Taking the Statistics NZ medium population growth figure, equating that to Housing Demand and deducting the Housing Capacity, there would appear to be a shortfall of 4,635 dwellings over 30 years or just 153 dwellings per year city wide.

WCC has not shown there is a material shortfall in housing capacity over the next 30 years (under the current rules) that is sufficient to justify removing the pre-1930s non-demolition rule to provide for intensified development. The amount of housing required is consequently unrealistically inflated. It has been designed to meet the highest possible growth in population, which is not feasible.

Almost all the additional housing required could be built under existing rules. It is a 30-year Plan but requires development in heritage areas from Day One, which may never be needed.

WCC should engage an independent, suitably qualified expert to review the key assumptions and rationale used in the plan. Consultation with key stakeholders must form part of a robust review.

The plan would allow developers to significantly increase the density of the population living in Mount Victoria. However, the draft plan provides no information concerning the infrastructural impacts, and how those adverse impacts will be addressed and mitigated satisfactorily. It is known there are little streams underground. It is known the stormwater and sewage pipes are old and need replacing and that flooding is an issue. The Spatial plan does not adequately address the significant adverse environmental impact of intensified development in light of WCC's knowledge of these environmental and infrastructure issues.

As one of the most densely populated suburbs in NZ and with some very old infrastructure given the age of the suburb, it is vital that the plan address the risk of infrastructure failure and upgrade expenditure be included as part of the spatial plan consultation.

Mount Victoria residents need more information regarding infrastructural impacts in order to make well informed submissions on the plan. How will the underlying 3 waters infrastructure support additional dwellings? What investment would be required for various population growth scenarios? Will it be paid for by the developers or will the cost fall on Mount Victoria and Wellington rate payers?

I and many other Mount Victoria residents are concerned about the process (or lack thereof) of developing and consulting on the Draft Spatial Plan.

It appears to have been rushed, sloppy and inadequate to the extent that different versions have been produced without notice to stakeholders, information has been difficult to access, questions about errors and differences cannot be answered by Council officers. Questions we have asked remain unanswered as at submission closing date.

The statistical analysis appears insufficient to justify the plan.

Lack of information on key areas, such as the infrastructure impacts, make it very difficult for to make well informed submissions.

I and other residents also need more information on the relationship between the Spatial plan and the District plan that is also up for review. Would agreement to key components of the spatial plan effectively prescribe and limit considerations that should be considered within the District Plan?

The submission deadline of 5 October has not allowed sufficient time for key stakeholders, those who will be impacted, to understand the implications and to prepare submissions. I and many other residents are requesting an extension and further relevant information to enable proper, lawful consultation.

I am not against more housing or more affordable housing but I and many other resident's favour:

- a) A phased development approach, so that it first takes place in areas that are already zoned for high density regeneration e.g. Te Aro flat between Kent Terrace and the Terrace/Willis St and either side of Adelaide Road
- b) A delay in increasing density in inner suburbs until we see how many can be absorbed in central Wellington and until we have a much better understanding of population increases
- c) An actively planned development process, rather than *laissez faire*, so the Plan does not give rise to low quality, inappropriate development in the wrong places.
- d) Further consideration about how effective safeguards can be put in place to ensure appropriate retention of character and quality, well -built weathertight dwellings in Mount Victoria which have appropriate infrastructure and sunlight.



Johanna Drayton

[Redacted]

Mount Victoria
Wellington

E: [Redacted]

P: [Redacted]

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

We want to hear your views on Our City Tomorrow (the Draft Spatial Plan).

Tell us what you think by answering these questions below

You can post this form to us (no stamp needed) or email this form to: planningforgrowth@wcc.govt.nz

You can also answer these questions online at:

planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form

Make a submission by **Monday 5 October 2020 at 5pm.**

Privacy statement - what we do with your personal information

View our full privacy statement online: planningforgrowth.wellington.govt.nz/privacy-statement

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the Resource Management Act.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

View Our City Tomorrow (the Draft Spatial Plan) online

planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan

Mobile and accessible version planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Our City Tomorrow: A Draft Spatial Plan for Wellington City (mobile and accessible version)

Downloadable PDF planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Summary of Our City Tomorrow: A Draft Spatial Plan for Wellington City (PDF)

Section 1 - your details *mandatory field

| | |
|--|---|
| Your name (first and last)*: | JONATHAN BRISCOE |
| Your email*: | [REDACTED] |
| Postal address: | [REDACTED] |
| Suburb: | Mt Victoria |
| Phone number: | [REDACTED] |
| Age range: | [REDACTED] |
| Household: | [REDACTED] |
| Preferred method of contact: | <input checked="" type="checkbox"/> Email <input type="checkbox"/> Post |
| <input checked="" type="checkbox"/> You would like to sign up to our email newsletter and receive news and updates regarding Planning for Growth | |
| You are making this submission: | |
| <input checked="" type="checkbox"/> as an individual | |
| <input type="checkbox"/> on behalf of an organisation. Your organisation's name: _____ | |

Section 2 - compulsory questions

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure | | | | | | | | | | | | | | | | |
|---|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|---|--|---|---|--|--|---|---|---|---|---|--|--|---|--|--------|
| 1. To what extent do you agree or disagree with what is proposed with intensification in the central city?* (Refer to Central City fact sheet number 02) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | |
| 2. To what extent do you agree or disagree with what is proposed with intensification in the inner suburbs?* (Refer to Inner Suburbs fact sheet number 03) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | |
| 3. To what extent do you agree or disagree with what is proposed with intensification in the outer suburbs?* (Refer to Outer Suburbs fact sheet number 04) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | |
| 4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs, and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?* | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | |
| a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?* | over inaccurate projection for future population - growths lower | | | | | | | | | | | | | | | | | | | | | |
| 5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?* (Refer to Character Areas fact sheet number 05) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | |
| 6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about character in these suburbs is important to you?* (Refer to Character Areas fact sheet number 05) | Historical, and visual appearance of the existing (mainly pre 1930) buildings in the existing landscape. Special attention - must be given to how they sit on Mt Victoria | | | | | | | | | | | | | | | | | | | | | |
| 7. What amenities would you want to help create a vibrant suburban centre?* Please pick your top 5 from the options below. | <table border="0"> <tr> <td><input checked="" type="checkbox"/> Proximity to parks and open space</td> <td><input checked="" type="checkbox"/> Infrastructure (stormwater, water supply, wastewater)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Access to public transport</td> <td><input type="checkbox"/> Social services and community facilities</td> </tr> <tr> <td><input type="checkbox"/> Public/shared spaces</td> <td><input type="checkbox"/> Medical facilities/centres</td> </tr> <tr> <td><input checked="" type="checkbox"/> Commercial activity (retail, cafes, local businesses)</td> <td><input type="checkbox"/> Access to cycleways/routes</td> </tr> <tr> <td><input type="checkbox"/> Employment opportunities</td> <td><input checked="" type="checkbox"/> Walkability within the centre</td> </tr> <tr> <td><input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc)</td> <td><input type="checkbox"/> Easy walking distance to the centre</td> </tr> <tr> <td></td> <td><input type="checkbox"/> Other (please specify)</td> </tr> <tr> <td></td> <td>Safety</td> </tr> </table> | | | | | | <input checked="" type="checkbox"/> Proximity to parks and open space | <input checked="" type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) | <input checked="" type="checkbox"/> Access to public transport | <input type="checkbox"/> Social services and community facilities | <input type="checkbox"/> Public/shared spaces | <input type="checkbox"/> Medical facilities/centres | <input checked="" type="checkbox"/> Commercial activity (retail, cafes, local businesses) | <input type="checkbox"/> Access to cycleways/routes | <input type="checkbox"/> Employment opportunities | <input checked="" type="checkbox"/> Walkability within the centre | <input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Easy walking distance to the centre | | <input type="checkbox"/> Other (please specify) | | Safety |
| <input checked="" type="checkbox"/> Proximity to parks and open space | <input checked="" type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) | | | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Access to public transport | <input type="checkbox"/> Social services and community facilities | | | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Public/shared spaces | <input type="checkbox"/> Medical facilities/centres | | | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Commercial activity (retail, cafes, local businesses) | <input type="checkbox"/> Access to cycleways/routes | | | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Employment opportunities | <input checked="" type="checkbox"/> Walkability within the centre | | | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Easy walking distance to the centre | | | | | | | | | | | | | | | | | | | | | |
| | <input type="checkbox"/> Other (please specify) | | | | | | | | | | | | | | | | | | | | | |
| | Safety | | | | | | | | | | | | | | | | | | | | | |
| 8. What amenities would you want to see around future mass rapid transit stops?* Please pick your top 5 from the options below. | <table border="0"> <tr> <td><input type="checkbox"/> Public shared spaces</td> <td><input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Landscaped spaces/plantings</td> <td><input type="checkbox"/> Child care</td> </tr> <tr> <td><input type="checkbox"/> Parks and playgrounds</td> <td><input checked="" type="checkbox"/> Medical facilities/centres</td> </tr> <tr> <td><input checked="" type="checkbox"/> Shops and businesses</td> <td><input type="checkbox"/> Bicycle parking</td> </tr> <tr> <td><input type="checkbox"/> Cafes and restaurants</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> <tr> <td><input checked="" type="checkbox"/> New housing</td> <td></td> </tr> </table> | | | | | | <input type="checkbox"/> Public shared spaces | <input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) | <input checked="" type="checkbox"/> Landscaped spaces/plantings | <input type="checkbox"/> Child care | <input type="checkbox"/> Parks and playgrounds | <input checked="" type="checkbox"/> Medical facilities/centres | <input checked="" type="checkbox"/> Shops and businesses | <input type="checkbox"/> Bicycle parking | <input type="checkbox"/> Cafes and restaurants | <input type="checkbox"/> Other (please specify) | <input checked="" type="checkbox"/> New housing | | | | | |
| <input type="checkbox"/> Public shared spaces | <input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) | | | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Landscaped spaces/plantings | <input type="checkbox"/> Child care | | | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Parks and playgrounds | <input checked="" type="checkbox"/> Medical facilities/centres | | | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Shops and businesses | <input type="checkbox"/> Bicycle parking | | | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Cafes and restaurants | <input type="checkbox"/> Other (please specify) | | | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> New housing | | | | | | | | | | | | | | | | | | | | | | |

| | Strongly Agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| <p>9. To what extent do you agree or disagree with the following statement?*</p> <p><i>Our City Tomorrow</i> outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be compact, resilient, inclusive and connected, vibrant and prosperous, and greener.</p> <p>(Refer to <i>Our City Tomorrow</i> fact sheet number 01)</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighborhood in a different way.</p> | | | | | | |
| <p>What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?*</p> <p><i>The ability to walk in a safe neighbourhood, to access the town belt and enjoy the pre 1930 dwellings</i></p> | | | | | | |
| <p>What amenities or facilities were missing or could have been improved?*</p> <p><i>Recycling collection which lead to increased rubbish on the streets</i></p> | | | | | | |

Section 3 - non-compulsory questions

| <p>1. What do you like about <i>Our City Tomorrow: A Draft Spatial Plan for Wellington City</i>?</p> <p><i>It does look at the future but appears to be driven by ideology.</i></p> | | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| <p>2. What would you change or improve?</p> <p><i>There needs to be more information which is accurate and based on actual data</i></p> | | | | | | |
| <p>3. Is there anything that needs to be considered as we plan for the future that is not provided for in <i>Our City Tomorrow</i>?</p> <p><i>As work habits change the number working in the City will reduce. Therefore there needs to be a change in thinking as to what facilities are provided</i></p> | | | | | | |
| <p>4. To what extent do you agree or disagree with the following statements considering what is proposed for the inner suburbs:</p> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| 4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through retention of a general character area to ensure that new development respects the local streetscape and is well-designed. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations where streetscape character is substantially intact. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? <i>View this section of Our City Tomorrow (the Draft Spatial Plan): planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites</i> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, greener city. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement? <i>View this section of Our City Tomorrow (the Draft Spatial Plan): planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites</i> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. We also want to understand the public appetite for community planning processes in specific areas, such as: Te Motu Kairangi/Miramar Peninsula This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route. Strathmore Park This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center. | | | | | | |
| 8. Do you support with the idea of a community planning process for the following areas? | | | | | | |
| 8.1.1 Te Motu Kairangi/Miramar Peninsula <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure | | | | | | |
| 8.1.2 Strathmore Park <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure | | | | | | |

9. If you answered yes, to the two questions above please respond to the following questions:

9.1.1 What should the **Te Motu Kairangi/Miramar Peninsula Framework** focus on or cover?

How does the Peninsula relate to the rest of Wellington. This will include retaining substantial portions of open space, access to the water, ease of access and recognition of historical aspects of the area

9.1.2 What should the **plan for regenerating Strathmore Park** focus on or cover?

Retaining portions for play/outdoor activity to accommodate increased population in the area

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <p>10. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?</p> <p>View this section of Our City Tomorrow (the Draft Spatial Plan):</p> <p>planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Natural & Open Space</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>11. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure</p> | | | | | | |
| <p>12. If you answered yes, to the question above what types of assistance would help landowners?</p> <p><input type="checkbox"/> Financial assistance (in special circumstances) <input type="checkbox"/> Planting <input type="checkbox"/> Other (please specify)</p> <p><input checked="" type="checkbox"/> Advice and guidance <input checked="" type="checkbox"/> Weed and pest control</p> | | | | | | |
| <p>13. Are there any final comments you wish to include in your submission? If so, please provide your comments below.</p> <p>The questions appear to be designed to get answers WCC wants in order to achieve their objectives, namely the implementation of the Spatial Plan. I have little confidence WCC (its Councillors and staff) will actually listen to the objections given the public statements already made by them.</p> | | | | | | |
| <p>14. Have you provided an attached document?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | | | | | | |

1011012

1st fold here - fasten here once folded

2nd fold here

Free Post WCC

**Absolutely Positively
Wellington City Council**

Me Heke Ki Pōneke



FREEPOST 2199
309/1039

Wellington City Council
PO Box 2199
Wellington 6140

Current position.

8. The draft spatial plan will retain our portion of Scarborough Terrace as a character sub-area. However, it will allow buildings up to 3 storeys, a change from the current restriction
9. More importantly Austin Street will change its restrictions. Buildings of up to 4 storeys will be allowed as of right and possibly higher if granted consent. This will impact on our view and sunlight. It may be said, by those supporting the change, this is an unfortunate consequence of progress but it is something that will affect us considerably.
10. We relied on the existing restrictions when investing a considerable sum in our home. We may be called "Nimby's" by those who wish to remove the current safeguards but we do not accept that is an accurate criticism. It is our home which we have designed for our retirement and wish to enjoy it to the full.

Attitude to the Plan.

11. We do not oppose change, but it must be appropriate to the area. Once the pre 1930 designation is uplifted the opportunity arises for inappropriate developments to occur which are out of scale to Mt Victoria. Unfortunately, in most cases developers are only after profit and I have little confidence in Council staff being able to determine what is appropriate. They will be constrained by the rules and will have to approve developments which have ticked the boxes.
12. The District Plan as it is allows development. There is no need to destroy the current regime. What is required is a considered approach which maintains the existing appearance and allows developments which enhance the neighbourhood with sympathetic buildings.
13. It appears the Plan has its genesis in a belief the number of people wanting to live in Wellington is going to increase dramatically in a relatively short term. However, the Council numbers seem to change as seem by the recent, dramatic, lowering of the number and thus the number of houses required. This is just one reason why a more considered approach is required.
14. To destroy Mt Victoria's heritage value to the rest of Wellington and NZ is not to be undertaken lightly. The attitude of the Council as expressed in the plan ignores the high value placed on the heritage of Mt Victoria as represented by its building in monetary and emotional terms. People "love" Mt Victoria and this should not be taken away in times of increasing uncertainty.
15. Once the buildings are removed they cannot be replaced and with them goes part of the soul of Wellington.

Additional Consequences.

16. Wellington has huge infrastructure issues in terms of water, sewage, power and roading. These need to be addressed first. To do otherwise is shortsighted and will detract from any other improvements. To allow, in effect, unstructured multistorey development of Mt Victoria will only increase the problems currently experienced.
17. One of the reasons given for the Plan is the need for cheaper accommodation. It is naïve to think this will occur. Any development will not be cheap. It will therefore

Attachment:

Submissions in opposition to WCC Draft Spatial Plan.

Submitter: Jonothan Briscoe

Address: [REDACTED] Mt Victoria

Email: [REDACTED]

1. While having grave doubts whether any heed will be given to the submissions of objectors to the draft plan it is necessary for me to voice my strong opposition to the plan as it affects Mt Victoria. The public statements of various Councillors and WCC staff appear to suggest they have pre-determined the issue and will approve the Spatial Plan despite the considerable opposition to it.
2. Some have said the opponents of the Plan are protecting their vested interest and are depriving future generations of the right to live in Mt Victoria. This is rejected. I am not opposed to new dwellings being constructed but are against indiscriminate destruction of the heritage of the area. Our children and grandchildren will be critical of us if we do not try and protect particular areas of Wellington.
3. One only needs to consider Old Saint Pauls. In 1964 there was a move to demolish the building. Only the vocal actions of a few were able to save a building which is now a National treasure. Throughout NZ other buildings have not been so lucky and their existence is only remembered in photographs.

Background.

1. My wife and I attended Victoria University. We lived for a large part of the time in a house at the top of the Dixon Street steps. We left Wellington at the end of 1974. Some years later we purchased an apartment on the Terrace adjacent to Dixon Street and visited Wellington regularly.
2. In 2017 we made a decision to return to Wellington permanently. I was retiring at the end of 2018 and our family were all in Wellington.
3. Mt Victoria was our preferred area as we had viewed it from both our flat in the early days and subsequently our apartment and noted how it was in sun until late in the day and were aware of its other advantages.
4. A house became available at [REDACTED] It needed considerable work but we wanted to retain its pre 1930 feel (it was built in the 1880/90's).
5. Before purchasing we obtained a LIM report. There was nothing in the report to indicate planned changes to the designations affecting the property.
6. We had considered building an upper storey and indeed had plans prepared. However, our home is in a sub area where properties on our side of the street are characterized by being single storey when viewed from the road. As a consequence we decided not to take it further as we were advised, given the special character, it would be a waste of time applying for consent. The LIM had revealed how much trouble previous owners had experienced getting even relatively minor consents approved.
7. In 2019/20 we carried out extensive renovations at considerable cost.

price the area out of the range of those who need cheaper rents/homes. Indeed many of those who currently live in the area will be forced out thus defeating what those proposing change hoped will happen.

Consultation.

18. There has been inadequate consultation. The changes have been pushed upon the community by those with an agenda. There the spectra of political pressure as a consequence of the Government National Policy Statement on Urban Development 2020. One questions whether in fact the Policy Statement does suggest the dramatic change contemplated by WCC
19. More time is required to enable proper community consultation with more information being available.
20. For example; what research has been done into the number of actual houses which are substandard in Mt. Vic? What impact will the pending changes under the Healthy Homes legislation have? How will the changes actually impact on existing tenants in Mt Vic?

Way forward.

21. A phased development approach is required. Areas already zoned for high density homes should be targeted for redevelopment. This will absorb a large portion of the required housing. It will allow time to more accurately assess what is in fact required.
22. Mt Vic can be the site of new developments but only where it is appropriate and after specialist consideration of the planned development vetted by an independent body of experts that are obliged to consider the impact on the immediate neighbours as well as the general neighbourhood.

Summary.

I am not advocating no change, just reasoned change. This is a something that is going to impact generations to come. It needs to be done well not in haste.

12/01/12

1st fold here - fasten here once folded

2nd fold here

Free Post WCC

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke



FREEPOST 2199
309/1039

Wellington City Council
PO Box 2199
Wellington 6140

Further information in support of pro-forma submission on Draft Spatial Plan

10 October 2020

Submitter Details

Roland Sapsford

[REDACTED]

Aro Valley

Wellington 6021

Email: [REDACTED]

Tel: [REDACTED]

Introduction

Born and raised in Wellington, I have flatted across the city in different locations for the majority of my life. Arriving in Aro Valley thirty years ago. I flatted there for 20 years and just over ten years ago bought the house I was then living in, continuing to share it with three flatmates.

I have raised my son in Aro Valley as a sole parent, living in rental accommodation for half his life, and understand first-hand the diversity and strength of connection that exists in our community. I love Aro Valley; its land, its people and its buildings. Long before I ever owned a house, I was curious about our story, going back well beyond just the time of colonisation.

Professionally and as an activist, I have been an advocate and enthusiast for a dense, vibrant, climate-friendly city with a strong heritage fabric for all of those thirty years.

I helped draft the first Select Committee report on transport, environment and land-use in the late 1990s, was a reviewer and advisor for the Parliamentary Commissioner for the Environment's first ever urban report in 2000, and contributed to the drafting of the Charter of the New Urbanism some 10 years prior.

In my work life I have actively championed the environmental and health benefits of insulation and passive solar design in buildings during much of the 1990s, and was heavily involved in the development of the Energy Efficiency and Conservation Authority and the creation of New Zealand's first home insulation programmes.

I have a first class honours degree in economic theory, economic modelling and financial history as well as training in medicine and post-graduate training in systems ecology. In addition I have been a Resource Management Act hearings commissioner for over a decade, and have extensive training and experience in facilitation and the design of collaborative processes.

Participation in hearings

If there are to be public hearings on the Draft Spatial Plan, I would like to be heard. I also request sufficient time to present the approach set out in this submission and the analysis which supports it.

Contents

| | |
|--|----|
| Introduction | 1 |
| Participation in hearings | 1 |
| Pro-forma answers to mandatory question | 5 |
| Overview | 5 |
| Address Process Matters | 5 |
| Submission Summary..... | 6 |
| Address Process Matters | 6 |
| Clearly identify and distinguish between key housing issues..... | 6 |
| Recognise the ways community voice, resilience and connection reinforce each other..... | 6 |
| Get the Best Data..... | 6 |
| Use up to date population projections..... | 6 |
| Create an inventory of under-utilised development capacity and find out why it exists..... | 6 |
| Understand the impact of removing minimum parking requirements | 6 |
| Adopt a holistic Spatial Planning Framework | 7 |
| Focus on the best outcomes for Wellington..... | 7 |
| Consider all relevant spatial factors..... | 7 |
| ...Recognise that “character” is grounded in a broader idea of heritage... .. | 8 |
| ... and develop a phased approach to both development and the updating of core data..... | 8 |
| Value Aro Valley and its people | 8 |
| Clearly identify and distinguish between key housing issues..... | 9 |
| Housing Development Capacity..... | 9 |
| Council can incentivise widely supported development under the existing plan.... .. | 9 |
| ...and needs to focus on adding new housing rather than demolishing existing homes..... | 9 |
| Creating more housing faces complex challenges.... .. | 9 |
| ...and the Spatial Plan needs refocussing to start tackling them..... | 10 |
| Housing Affordability | 10 |
| Affordability relates to income... .. | 10 |
| ..and has been an issue for decades | 10 |
| Advocates of the spatial plan offer a magic solution..... | 10 |
| ...but the reality is far more complex... .. | 10 |
| ...and the draft Spatial Plan is unlikely to help..... | 11 |
| The cost of renting and the cost of housing are linked problems.... .. | 11 |
| ...which require targeted local action to solve..... | 11 |
| Council can use partnerships to secure capital..... | 12 |
| ...delivering steady returns and affordable housing..... | 12 |

| | |
|--|----|
| Successful models exist for long-term affordable ownership and affordable renting.... | 12 |
| ...but we need to focus on leadership and partnership rather than deregulate and hope..... | 12 |
| Housing Quality..... | 13 |
| Quality has many dimensions,,, | 13 |
| ...and building age can be a dubious indicator of overall quality. | 13 |
| Improving housing quality is urgent..... | 13 |
| ...and has little to do with the current draft Spatial Plan..... | 13 |
| ..but a more holistic Plan can help maintain and enhance quality..... | 14 |
| Recognise the ways community voice, resilience and connection reinforce each other..... | 14 |
| Get the Best Data..... | 15 |
| Use up to date population projections..... | 15 |
| Create an inventory of under-utilised development capacity and find out why it exists..... | 16 |
| Understand the impact of removing minimum parking requirements | 17 |
| Adopt a holistic Spatial Planning Framework | 18 |
| Focus on the best outcomes for Wellington..... | 18 |
| Consider all relevant spatial factors..... | 19 |
| Recognise and provide for climate impacts and internal migration..... | 19 |
| Focus on transport and land use integration to build community and reduce emissions | 19 |
| Recognise the emissions benefits of existing wooden housing..... | 20 |
| Identify areas for potential special projects | 21 |
| Align transport and land use integration, infrastructure investment and the timing of special projects | 21 |
| Identify transitional areas and consider boundary changes to achieve this | 22 |
| Align height limits with the landscape and street orientation | 22 |
| Incorporate wind and shade effects at the spatial planning stage..... | 23 |
| Provide for additional accessible green space..... | 23 |
| ...Recognise that “character” is grounded in a broader idea of heritage... | 24 |
| ... and develop a phased approach to both development and the updating of core data..... | 26 |
| Value Aro Valley and its people | 27 |
| Aro Valley is a classic example of “living heritage” | 27 |
| ...with a rich social and cultural heritage... | 27 |
| ..and extensive hidden waterways... | 27 |
| ..as well as proud history of creating its own destiny..... | 27 |
| The current Aro character sub-areas omit important groups of buildings..... | 27 |
| ... the failure to protect Holloway Rd is a major omission..... | 28 |
| .. and there is no coherent vision for the Valley as whole..... | 29 |

| | |
|---|----|
| Aro Valley has the potential to lead by example..... | 29 |
| Appendix 1 Process Matters for Review | 30 |
| There are real questions whether the Draft Spatial Plan was ready for public release | 30 |
| Elected officials deserved the change to endorse or reject policy changes | 30 |
| Data and evidence was missing from the public conversation | 30 |
| A crucial phase was omitted from overall public consultation..... | 30 |
| Risks associated with the National Policy Statement on Urban Design were not raised with councillors | 31 |
| The framing of consultation material could have been more transparent and balanced..... | 31 |
| ENDNOTES..... | 33 |

Pro-forma answers to mandatory question

My pro-forma submission addressed both mandatory and optional questions. The rationale for those responses is set out in the remainder of this document. My responses to the mandatory pro-questions was:

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City **strongly disagree**
2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs **strongly disagree**
3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs **strongly disagree**
4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution? **disagree**
5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs **strongly disagree**
6. Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener **strongly disagree**

Overview

The last thirty years' experience with urban development contains some clear lessons for Wellington City. The purpose of this submission is to

- set out the case that an approach to spatial planning grounded in partnership and leadership will perform better than the current model.
- sketch a framework for such a leadership and partnership model in sufficient detail to demonstrate it is viable alternative.

In this way, the submissions provides a detailed rationale for the specific pro-forma answers above and seeks to offer a way forward that will serve Wellington well over the next few decades.

The core of a more holistic and human-centred approach to a spatial plan is co-design of a sequenced and adaptive approach to change. Using such an approach Wellington can have sufficient affordable quality housing, a high level of heritage protection, enhanced participatory democracy and much lower greenhouse gas emissions.

Address Process Matters

No process is perfect and it is easy to underestimate the work and pressure involved in preparing a document such as the Draft Spatial Plan. However, there are some significant process issues at a high level design and development level, and an independent review of the process to date may be appropriate. These concerns are summarised in Appendix 1

Submission Consider an independent review of the process to date, encompassing at least the matters set out in Appendix 1, by appropriate qualified independent parties.

Submission Summary

The following sets out the core submission points contained in this document. These summarise the rationale and context for the answers provided in the pro-forma submission above.

Address Process Matters

Submission: Consider an independent review of the process to date, encompassing at least the matters set out in Appendix 1, by appropriate qualified independent parties.

Clearly identify and distinguish between key housing issues

Submission: Develop a systematic approach to housing capacity, housing affordability and housing quality, grounded in solid local evidence and drawing on successful experience from around the world

Recognise the ways community voice, resilience and connection reinforce each other

Submission: Reframe the idea of inclusion and connection to

- i. include building on, and learning from, the strengths of existing communities, especially those which are already resilient and medium density;
- ii. recognise the importance of collective agency to community wellbeing; and
- iii. focus on creating conditions for new resilient and connected communities to emerge.

and ground next steps in more participatory processes for community evolution.

Get the Best Data

Use up to date population projections

Submission: The best estimates of population available at present suggest Wellington's population for HBCA purposes in 2050 will be between 44,400 and 56,000, rather than "50 to 80,000" or just "80,000". The best single figure estimate to use is 50,000, and attention ought to be drawn to the fact this allows for a 20% margin over raw estimates.

Create an inventory of under-utilised development capacity and find out why it exists.

Submission: Assess capacity for housing (including mixed-use) development currently available on under-utilised sites (as set out below), assess why this capacity is not being developed, and identify options for accelerating the rate and extent to which this capacity is realised.

- Vacant land
- Vacant commercial buildings suitable for residential conversion
- Land use exclusively or largely for parking or vehicle storage
- Land occupied by low quality 1-2 story post-1960 commercial buildings

Understand the impact of removing minimum parking requirements

Submission Evaluate the effect of removing minimum parking requirements on the amount of development capacity that exists under existing planning rules, and also assess its impact on clearance of greenspace on steep, previously uneconomic sites.

Adopt a holistic Spatial Planning Framework

Focus on the best outcomes for Wellington

Submission: Recast the Spatial Plan in a Local Government Act policy frame; working from the 2015 Growth Strategy as a base, update it in light of more recent policy decisions (eg re transport and climate change), and then look at any how this vision can be achieved using Resource Management Act tools.

Consider all relevant spatial factors...

Recognise and provide for climate impacts and internal migration

Submission: Use the most up to date information, and provide for regular periodic reviews and updates over the life of the Plan, to assess risks to existing housing from storm surge and sea level rise, as well as to assess the suitability of sites for new developments, and factor impacts on existing housing into any assessment of housing capacity.

Focus on transport and land use integration to build community and reduce emissions

Submission: Make creating a network of 15-minute urban villages, linked by great public transport a centrepiece of the approach to densification and spatial evolution and recognise that this will require a more active planning approach than simply widespread deregulation of height limits.

Recognise the emissions benefits of existing wooden housing

Submission: Evaluate the impact of allowing increased demolition of character wooden buildings on landfill methane emissions, and assess the overall emissions impact of a sequenced and focussed approach to intensification as compared with the current broad deregulatory model.

Identify areas for potential special projects

Submission: Identify priority sites for large-scale intensification subject to master-plan driven development, with appropriate provision for heritage, greenspace, sunlight and wind, and accessibility, starting with:

- Johnsonville Mall and surrounds
- The north end of Adelaide Rd
- Kilbernie retail and parking area

Align transport and land use integration, infrastructure investment and the timing of special projects

Submission: Use the spatial plan to signal and spatially align transport investment, land-use intensification, and three-waters investment.

Identify transitional areas and consider boundary changes to achieve this

Submission: Modify the spatial plan to support, maintain and develop transitional experiences between areas of significantly different height, notably but not exclusively at the boundary of the Central Area, and adjust boundaries to enable such a transition to be maintained and developed – for example in south-west Te Aro, move the Central area boundary inward to run along Caro Drive from Taranaki St to Victoria St, down Victoria St to Vivian St and then up Vivian to join the current boundary.

Align height limits with the landscape and street orientation

Submission: Modify blanket application of height limits and minimum heights in the Central Area, Newtown (and elsewhere as needed) so that that heights are related to underlying topography, street width and alignment and the quality and safety of public experience on streets.

Incorporate wind and shade effects at the spatial planning stage

Submission: Explicitly recognise and provide for the effects of shading and wind hazard in setting policies for the location and form of buildings of varying heights, and the location of greenspace, within a revised spatial plan

Provide for additional accessible green space

Submission: Explicitly

- i. provide for people to see and access a variety of new as well as existing greenspaces throughout the city, especially in relation to areas of densification and increased height;
- ii. provide for ecological corridors and potential opportunities to daylight parts of streams; and
- iii. assess the effect of different models of intensification on retention or loss of greenspace on private land.

...Recognise that “character” is grounded in a broader idea of heritage...

Submission: Develop an approach to change in the character areas ground in the concept of living heritage, where demolition controls are maintained, appropriate development is initially focussed on suitable sites without character buildings, and the evolution of these areas is shaped through participatory co-design.

... and develop a phased approach to both development and the updating of core data.

Submission: Develop an explicit sequence of intensification, starting with climate robust “win-win” sites, and build in regular reviews of this sequence to support learning by doing, the regular incorporation of new information, and co-design processes for key aspects of the Plan.

Value Aro Valley and its people

Submission: Rectify the omissions from the current-sub area proposals for Aro Valley, retain demolition controls over the same area as at present (including Holloway Road), focus intensification on underutilised sites and under a co-design process with the Aro Valley community to help shape its future.

END OF SUMMARY

Clearly identify and distinguish between key housing issues

Public and political discussion has focussed on housing and the framing of the Draft Spatial Plan has been in terms of the need to house more people. This has invited, and naturally led to, a conflation between current concerns about high housing costs (both for purchase, and for rent) and the Draft Spatial Plan. This section provides some background context and framing for the remainder of my submission.

Any further discussion needs to more clearly distinguish between, and define:

- **Housing Development Capacity**, and the factors which influence this
- **Housing Affordability**, including greater clarity around the concept of “affordable”
- **Housing Quality**, in terms of a broad range of factors that affect quality of life

Housing Development Capacity

Council can incentivise widely supported development under the existing plan....

Housing Development Capacity is a planning concept which looks at the available capacity and location. In discussion (for example, refer the HBCA) planners distinguish between what is theoretically enabled and what is likely to be realised.

Both enabled capacity and realised capacity are affected by policy, but the focus in the DSP is almost entirely on increasing enabled capacity. This is a major evidence-gap. No work has been done on ways to increase the realisation of the existing level of enabled capacity, or on a sequence of sites where such capacity could be realised. This gap needs to be addressed with urgency.

...and needs to focus on adding new housing rather than demolishing existing homes.

The concept of Development Capacity needs to be expressed in terms of net gains rather than gross changes. The Draft Spatial Plan is very focussed on replacing existing houses rather than on creating new homes on land within existing communities that is not currently used for housing. Assessment of development capacity needs to focus less on plan enabled capacity and more on the opportunities for intensification through the creation of new housing *in addition* to existing housing. One way to see this is as a logical extension of the current approach to infill housing.

Creating more housing faces complex challenges....

Key barriers to the realisation of development capacity at present appear to include:

- Access to finance
- Cost of raw materials
- Heavy emphasis on bespoke construction *in situ* rather than prefabrication
- Shortage of skilled labour
- Availability of three-waters infrastructure to support developments
- Insurance and other financial and administrative challenges with building management

These are not primarily District Plan matters but rather issues which need to be resolved through innovative partnerships and long-term planning. Some are national issues. A local council can help address these through innovative development finance models, providing a clear sequence for intensification which reflects civic goals and the timing and nature of infrastructure investment, and partnering in early initiatives to create good examples which others can copy. Developing a master plan approach to large sites, and creating clear pipelines for development investment are likely to be far more effective in realising latent capacity than the steps proposed in the draft Spatial Plan.

...and the Spatial Plan needs refocussing to start tackling them.

There is little evidence to suggest that Wellington needs to focus on enabling more capacity through broad-brush deregulation. Rather the key priority ought to be on a clear sequence and plan for intensification on currently unrealised capacity. The 2015 Urban Growth Plan provides a good spatial starting point for such an approach.

Housing Affordability

Affordability relates to income...

Affordable housing is a term which means different things to different people, but in broad terms it needs to reflect the share of people's after tax income devoted to housing and related costs (such as transport). Housing in the middle of nowhere, for example, is unlikely to be affordable in this sense even if it is cheaper to buy. Again there are many definitions, but one approach is to define affordable social housing in relation to supported income, and affordable housing in general in relation the median income.

..and has been an issue for decades

Housing Affordability is a complex concept, and is often defined rhetorically in the negative as "housing is unaffordable".

The cost of purchasing a new home has been high for well over a decade and possibly longer. While the focus is often on house prices, it is the combination of deposit requirements, interest rates and price that determine affordability in relation to median income. As data from the Ministry of Housing and Urban Development demonstrate, affordability from this broader perspective has been an issue for some years.

Importantly however, with very low interest rates, prices may rise significantly before overall affordability falls sharply. This manifests in reports of first home buyers being willing to pay "what it takes" to own a property.

Advocates of the spatial plan offer a magic solution...

Advocates of the Draft Spatial Plan's deregulatory model (and at times this seems to include Council officers) offer a story to explain this as follows:

- ➔ High prices are caused by a lack of housing construction
- ➔ Housing constructions is constrained by a lack of available land
- ➔ Deregulation especially removal of demolition controls and height limits frees up "land"
- ➔ Once the constraint is relaxed, developers will build more in response to the high prices rapidly creating more housing
- ➔ Over time competition will drive prices down to an affordable level

This is a fairly standard piece of neoliberal rhetoric and has a superficial plausibility. The basic argument is that by removing regulations and unleashing private property rights a better outcome for all will emerge. In some situations there may even be some truth to it (eg regulating total number of food premises in New Zealand was probably unnecessary). However it is a simplistic and inaccurate model for housing, and even a brief review of evidence suggests a more complex picture.

...but the reality is far more complex...

New dwelling construction has been continuing and is increasing in response to higher prices. From 2013 to 2018, new dwellings in Wellington as a whole grew at a faster rate than the total population and the rate of new dwelling addition in the character areas was around 1.5 times that for the rest of the city.

There is little evidence (and none presented in the DSP) to suggest that the availability of development sites per se is constraining construction of new dwellings within the urban boundaries. There is a very large stock of potential development sites and areas across the city, and there has been significant uptick in consented applications for new dwellings over the last two years.

However, in keeping with patterns observed across New Zealand, an increasing share of dwelling construction in Wellington over the last decade has been directed towards high-end larger floor area dwellings¹, rather than at the “middle” of the market. The purchasers of these dwellings are often primarily interested in capital gains. Such investors may look for high-end rental arrangements or even keep dwellings vacant. The other prevalent model of development is for investors to buy into a “purchase to lease” model for small apartments, which are rented fairly continuously on a short-term basis. Together these create a shortage of new housing medium-scale housing affordable to middle-income earners within an overall pattern of ongoing development.

The result is a “hollowing out of the middle”. This process has been well-described in unregulated urban property markets for over a century. More broadly, the “hollowing out” of the middle class is phenomenon found across societies which embraced neoliberal reforms in the 1980s and 1990; in housing, it both reflects and reinforces broader patterns of inequality.

[...and the draft Spatial Plan is unlikely to help.](#)

In this situation the DSP deregulatory measures may simply lead to the “cherry picking” of development sites but little overall change in the volume of residential construction or accommodation. Essentially one may see an addition to high-end housing capacity at the expense of a loss of character dwellings – especially those currently used as rentals - and the persistence of brownfields sites. In this situation there is a risk of confusing height with density. As experience in Auckland shows, two five storey luxury apartment buildings may actually house *fewer* people than two large two-storey Victorian villas housing people on lower incomes. Focussing on demolition and rebuilding rather than new construction can mean that the net addition to actual dwelling capacity may be quite low, even if there is flurry of apparent activity.

[The cost of renting and the cost of housing are linked problems....](#)

One consequence of long-term purchase unaffordability is the extension of renting into older age groups and an overall rise in the share of the population renting. This places pressure on the availability of rental housing. In a market environment, the natural result is a rise in rental costs. Wellington for many years had a relatively good supply of rental housing but the process described here has led to rising rents, albeit with a lag of a few years compared to house prices. Ability to pay provides a natural cap to the level of rentals that can be charged; in this situation rentals tend to rise more quickly in less sought-after areas, and the floor area of rentals tends to fall. This plateauing of rental rates has been seen across Wellington in recent years, as has a growth in very small floor area rental apartments as noted above.

[...which require targeted local action to solve.](#)

In the absence of national level policy initiatives, creating quality affordable accommodations at a local level requires creating a stock of housing using a different model, and maintaining separation from the broader property market. Rather than directly affecting private supply, this model creates an alternative in competition with the private rental and ownership market. If done at sufficient scale, this approach both fills out the missing middle in housing supply and provides a competitive

¹ “dwellings” here refers to stand-alone houses, larger multi-unit developments and high-end apartments.

cap on rentals in the private sector. People can then move freely between the two. Variations on this basic model are the core of many affordable housing models in Europe.

[Council can use partnerships to secure capital...](#)

One concern that is raised with such an approach is that the Council faces a borrowing constraint. This is not the place for a detailed treatise on how such models work, but there is no reason that all the capital needs to come from the public sector. The key is to work at sufficient scale to provide a stable rate of return over the long term,. This means that rather than “mum and dad” investors seeking capital gains on individual properties or property developers seeking an immediate pay out on a specific building project, funding comes from large, long-term investors such as superannuation funds.

[...delivering steady returns and affordable housing.](#)

A low-risk steady return in the 3-5% range is a very attractive proposition for a long term investor. Compare this with the roughly 25% or more return required on completion to finance a new private apartment development, and the challenges in securing such investment when property companies have a mixed history with large developments in recent years. The “wedge” between 25% and 3%, coupled with the focus on return as an ongoing flow of income rather than a lump sum payment, enables a much greater focus on enduring quality, sustainability and affordability, and crucially a greater variety of housing types.

Such developments may have a mix of housing options ranging from open market sales through affordable sales allocated by ballots which have entry criteria, through to collectively-owned long-term social housing. Among other benefits this can enable people to change housing types while remaining within the same community.

[Successful models exist for long-term affordable ownership and affordable renting....](#)

Again there are a great variety of specific models but there are at least two general models for rental and ownership in such developments:

Firstly people who purchase an “affordable unit” can have what is traditionally described as an ownership interest, but they resell into a pool at a known price rather than selling on the open market. The pool then sells this unit onto a new purchaser at an affordable price. Again, the specifics are numerous but the pool might purchase back a house at sale price plus 3% per annum for example.

Second rather than ownership interests, people can have a tenancy arrangement which varies according to need. In such a model there are a spectrum of tenancy types, where the owner get increasing certainty and tenants get increased security and agency with the use of the property. This aligns interests and enables both landlords and tenants to choose the type of arrangement they want. Rents are set on the basis of securing a stable long-term return for the whole development rather than on a short-term market basis.

[...but we need to focus on leadership and partnership rather than deregulate and hope.](#)

Once one starts to examine these models, one can start to envisage a system suited to large scale developments on sites such as Adelaide Rd and Johnsonville Mall, with a variety of housing and tenure. Once the management capacity for such a system is developed then the model can be extended to other undeveloped sites which are spatially disconnected but exist in close proximity to each other.

Wellington needs to have an urgent conversation about how to kick start such developments. The draft Spatial Plan is a dangerous distraction which is dividing people and promises a “magic solution” to housing affordability through deregulation. This is a myth. Affordable housing is achievable. But achieving it will take leadership and partnership and hard detailed work, not a deregulate and hope approach

Housing Quality

Quality has many dimensions,,,

Housing quality is about the lived experience of housing. Dimensions include

- Warmth and ventilation
- Mould and damp
- Accessibility
- Noise
- Experience of natural light and sunlight
- Access to and views of greenspace
- Personal Safety
- Access to community and/or support
- Sense of belonging

Housing quality also needs to encompass durability and resilience of the housing stock. There is little point in creating new warm, dry housing that will be cold, damp and leaky in a few years, nor housing that is vulnerable to natural hazards generate by climate change. Discussions about earthquake safety need to be grounded in the fact that many of Wellington’s older buildings have withstood multiple severe quakes intact, and that a square wooden house is one of the safest places to be in a major quake.

...and building age can be a dubious indicator of overall quality.

Many of Wellington’s older character wooden buildings have lasted far longer than some contemporary buildings will endure, and with basic maintenance can last as long again. By contrast some buildings, including apartments built in the 1980s and 1990s, are facing major repair and refurbishment costs arising from poor construction and/or use of material of limited durability. Some of these dwellings are also amongst the worst offenders in terms of damp and mould.

Improving housing quality is urgent....

Everyone deserves a warm, dry home. Discussions about mould and damp have dominated conversations around the Spatial Plan, with the suggestion that these are problems associated with character housing. This conversation is driven by anecdote and even cursory inspection of census information provides a much more complex picture; these problems occur across the city, in a wide range of locations. Early analysis suggests that topography and the NZDEP rating are much better predictors of mould and damp than the presence or absence of “character homes”.

...and has little to do with the current draft Spatial Plan...

Housing quality is critical, but serious work on this issue risks being distracted by the false idea that allowing demolition of most houses within the character areas will help solve the problem. What is needed is more rapid enforcement of Healthy Homes standards, ideally coupled with a basic

Warrant of Fitness tied to these standards². The most immediate step Council could take would be to look at its capacity to use its health enforcement powers to support compliance work around these standards. A rapid increase in the level of compliance with the Healthy Homes standards will do far more for people's quality of life than the deregulatory measures contained in the Spatial Plan.

..but a more holistic Plan can help maintain and enhance quality.

The Spatial Plan needs to focus on the broad characteristics of housing quality, especially those which relate to spatial factors such as community coherence and the impact of location on light, damp and warmth. Broad policies to:

- encourage retention and improvement of existing resilient and durable homes; and
- ensure that new development is durable and resilient, and make good use of warmth and light

are both important within a spatial plan.

Housing quality matters. The broad proposal in this submissions for a sequenced approach, focussed on incentives for specific sites, and creation of good examples, could make delivering quality newer housing more straightforward. In this model the Council can focus on using incentives and partnerships to deliver high quality in new developments, while raising standards across the board in the existing housing stock through education and enforcement.

Submission: Develop a systematic approach to housing capacity, housing affordability and housing quality grounded in solid local evidence and drawing on successful experience from around the world

Recognise the ways community voice, resilience and connection reinforce each other

Community voice and collective resilience deserve greater attention. There is a significant gap in the overall Vision around maintaining community resilience and cohesiveness, and enabling people to orientate, locate and thrive within their natural and physical environment.

The discussion around inclusion and connection seems to lack both a collective frame of reference, and a grounding in current community experience. Where is the discussion about how to replicate and build on the strengths of existing communities? The collective strength of existing community is not acknowledged let alone considered, yet these considerations are foundational to a fully-informed discussion on density and the way decisions are made about density.

In the late 1980s and early 1990s, people around the globe, faced with urban sprawl and an exploding volume of traffic, parents who were too scared to let their children walk or cycle alone and the lack of quality housing asked if a different future was possible for cities.

² The Wellington City voluntary Warrant of Fitness failed because it was too ambitious, including a grab-bag of ideas, with a limited evidence-base for the inclusion of particular items. By contrast the Healthy Homes standards are carefully formulated minimums which ought to be enforced across the Board.

From this came new urbanism, the idea that we could learn something from the walkable, medium density neighbourhoods of the past, the ones with strong local hearts and a sense of community. In short, that we could learn something from places like Aro Valley.

Human relationships are stronger when people have a connection to the landscape and its stories as they walk through it. People deserve a sense of community, they deserve a home, and they need to feel some agency over what happens in their community. Communities are severely affected when they are subject to, or threatened with, rapid change over which they have no agency. Yet there is no recognition of the value generally of framing and shaping futures together.

Rather the draft spatial plan focuses on building height deregulation across large areas of the city, and the removal of demolition controls from around three quarters of the areas to which they currently apply. In this sense it represents a transfer of rights from community and council to private landowners and a rejection of the idea that communities benefit from having some agency over their evolution. This is an explicit policy choice that ought to have been made by councillors at the outset rather than embedded implicitly in a document and left to the public to educe.

In short the underlying approach is overly individualistic and future work needs to engage with ways to strengthen and grow strong communities. Bring the idea of co-design of a sequenced and adaptive approach to change to the fore suggests an alternative approach might look at:

- i) how we build on the strengths of existing communities and support them to welcome more people; and
- ii) how we best create conditions for people to create further resilient and connected communities.

Submission: Reframe the idea of inclusion and connection to

- iv. include building on, and learning from, the strengths of existing communities, especially those which are already resilient and medium density;**
- v. recognise the importance of collective agency to community wellbeing; and**
- vi. focus on creating conditions for new resilient and connected communities to emerge.**

and ground next steps in more participatory processes for community evolution.

Get the Best Data

Use up to date population projections

The Housing and Business Development Capacity Assessment Wellington City Council 2019 (henceforth HBCA) states that it has used information from Forecast.id and the StatsNZ high series to derive estimates of 46,766 and 74,484. These numbers were then further rounded up in public discussion to 50,000 to 80,000 or at times, just 80,000.

The basis for this “round up and disregard the lower estimate” approach has not been explained. The choice of the StatsNZ high series is not explained anywhere, and StatsNZ themselves advise against the use of this series in predictive modelling. From a statistics communication perspective, the use of 80,000 as a standalone figure is misleading as it presents a rounding-up of an upper bound as a reasonable or reliable estimate.

Both data sources draw on the 2013 Census and do not incorporate information from the 2018 Census. The forecast.id series used in the HBCA has the 2018 population as 211,142. In fact the

Census population in 2018 for Wellington City was 202,737, some 8,405 lower. The forecast is an over-estimate of around 4%. This reinforces concerns with the use of “80,000” in public discussion.

StatsNZ will release updated population forecasts based on the 2018 Census soon. In the interim a more accurate range can be derived by taking the actual 2018 Census population and applying a range of growth rates to this.

Forecast ID uses a simple exponential formula to generate its forward projections. The growth rate is published as 16.04% over the period 2020 to 2043ⁱ. This is equivalent to an annualised growth rate of approximately 1.0065ⁱⁱ

If we assume that the long-run population growth rate used by forecast ID is correct then we can generate a new figure for 2050 based on the actual 2018 Census and then applying to the forecast ID growth rate to this figure. These estimates can then be rounded up by the 20% margin required for the HBCA. On inspection the estimates of housing capacity appear to be linear transformations of the population forecast and so increasing population by 20% will provide a 20% margin on housing capacity.

This approach gives a 2050 population estimate of $202737 \times (1.0065)^{32}$ of 249,445, an increase of 46,708. Adjusting this up by 20% gives a forecast population increase for HBCA purposes of **56,049**.

The growth rate in population has however been *lower* than forecast between 2013 and 2018 Censii. The actual growth in population was 11,781, which is an annualised growth rate of only 1.00525. Applying this lower figure to the 2018 population gives a 2050 estimated population of 239,704, an increase of 36,967. Adjusting this increase upward by 20% gives a forecast population increase of **44,360**.

The best round number to use for population, adjusted upwards by 20%, is **50,000**. Without a 20% margin, it is 40,000. There is no justification to present expected population growth as 80,000, which overstates the expected growth by around 60%, even including a 20% margin.

Submission: The best estimates of population available at present suggest Wellington’s population for HBCA purposes in 2050 will be between 44,400 and 56,000, rather than “50 to 80,000” or just “80,000”. The best single figure estimate to use is 50,000, and attention ought to be drawn to the fact this allows for a 20% margin over raw estimates.

[Create an inventory of under-utilised development capacity and find out why it exists.](#)

The spatial plan suggests enabling intensification across a much larger land area than is needed to provide the additional housing capacity based on the Stats NZ high estimate. At the same time, the plan is silent on the underutilisation of existing development capacity. In the preparation of the Plan the only inventory undertaken was in relation to character in inner-city suburbs. This was done prior to any work on scenarios.

Development capacity is a policy variable, not only in respect of enabled capacity, as the Spatial Plan suggests but also in terms of feasible, realisable and realised capacity. However the Wellington City Council has not availed itself as yet of the data needed to design policy measures to address unutilised and under-utilised capacity within the existing planning settings.

Before proceeding the Council needs to inventory at least the following under-utilised capacity:

- Vacant land

- Vacant commercial buildings suitable for residential conversion
- Land use exclusively for parking or vehicle storage
- Land occupied by low quality 1-2 story post-1960 commercial buildings

Even a cursory examination via Google Earth suggests that, together:

- these are likely to offer more than enough enabled development capacity to address any forecast shortfall in housing provided they are developed appropriately; and
- these exist in locations across the city which fit with broad aspirations for the distribution of intensification.

A preliminary question, which the Council needs to explore is *why* these sites are **not** being developed at present. The core policy question then becomes how to encourage the early realisation of this capacity on these sites?

Submission: Assess capacity for housing (including mixed-use) development currently available on under-utilised sites (as set out below), assess why this capacity is not being developed, and identify options for accelerating the rate and extent to which this capacity is realised.

- Vacant land
- Vacant commercial buildings suitable for residential conversion
- Land use exclusively or largely for parking or vehicle storage
- Land occupied by low quality 1-2 story post-1960 commercial buildings

[Understand the impact of removing minimum parking requirements](#)

The removal of minimum parking requirements will have two significant effects relevant to Wellington. First this change will increase the amount of available development capacity as land and floor space are available for alternative use. This will occur on existing intensification sites, where more capacity is realised within a development. Second, this change will make development of some steeper sites viable as housing construction will be possible on sites where previously the cost of providing off-street parking made development prohibitive. This second effect is likely to reduce people's experience of greenspace, as well as enabling more construction.

The overall impact of the elimination of minimum parking requirements may be to increase development capacity under current rules by as much as 5 to 10%. These effect needs to be quantified before any judgement is made about the adequacy of existing development capacity.

Submission: Evaluate the effect of removing minimum parking requirements on the amount of development capacity that exists under existing planning rules, and also assess its impact on clearance of greenspace on steep, previously uneconomic sites.

Adopt a holistic Spatial Planning Framework

Focus on the best outcomes for Wellington

Council officers have stated on a number of occasions that the Spatial Plan is a policy document prepared under the Local Government Act, and would offer policy guidance to a District Plan review. Indeed the HBCA suggests that there would be a review of the 2015 Growth Strategy prior to work beginning on the District Plan review.

Rather than policy guidance, the draft Spatial Plan focuses on a very granular profile of height limits grounded in an overall approach of building height deregulation rather than a more nuanced approach reflecting the complex factors affecting wellbeing. The spatial plan adopts a form that is more akin to a District Plan than to the approach taken in the 2015 Urban Growth Strategy.

Furthermore the draft Spatial Plan uses the 2020 National Policy Statement – Urban Development to justify certain actions eg widespread deregulation of height limits. However, the draft Spatial Plan does not also make use of other provisions to NPS-UD 2020 to modify these actions, nor does it address matters critical to spatial planning at the level of granularity it contains.

Some examples include

- the lack of focus on matters of national importance as qualifying matters – notably historic heritage, but also the selective approach to natural hazards in the spatial plan.
- The lack of consideration of wind and shade effects in relation to building heights; these are matters intrinsic to a granular spatial plan
- The provision of additional green space in both existing areas of medium/high density and new areas proposed for intensification

More fundamentally, if the Spatial Plan is a document prepared under the Local Government Act, then it needs to relate to existing policy settings and the four wellbeings, and provide guidance at a policy level.

The 2015 Growth Strategy provides a starting point for a growth spine model and a model which recognises the value of heritage and character areas. It remains unclear why the spatial planning team did not continue with a review of this document, Only five years old and a decade in the making, it provides a solid foundation for spatial issues such as the location and sequencing of densification, the importance of a growth spine linking transport and land use, and the value of character areas.

An alternative approach for the next phase of spatial plan work would be to

1. start with what we know about what the City wants and needs – which at a high level is articulated in the 2015 Spatial Plan, and subsequent strategies such as Te Atakura
2. then update the 2015 Growth Plan in terms of new information – for example about climate change, mode share and transport investment needs as well as updated population forecasts.
3. then look at how the District Plan can achieve the aspirations of the updated Growth Plan in a manner consistent with the Resource Management Act requirements, including the NPS-UD

Submission: Recast the Spatial Plan in a Local Government Act policy frame, working from the 2015 Growth Strategy as a base, update it in light of more recent policy decisions (eg re transport

and climate change), and then look at any how this vision can be achieved using Resource Management Act tools.

Consider all relevant spatial factors...

Recognise and provide for climate impacts and internal migration

Wellington has a number of vulnerabilities to rising sea levels and storm surge. These include coastal roads exposed to Cook Strait and coastal settlement strips at the base of escarpments, as well as low-lying residential areas close to the south coast.

Looking over the 30 year horizon of the Plan, it is likely that some of these areas will become uninhabitable due to storm surge and sea level rise. The impact of this on internal migration within the city, and the likely desire of people to stay close to communities (eg someone from Karaka Bay Rd may seek to move to medium density in Miramar) needs to be considered.

Climate risks are growing and they increase in a non-linear way. The rate of sea level rise is increasing and the Spatial Plan needs to consider the most up to date information on sea level rise and storm surge risks. While climate risks affect the viability of certain locations for new development, they also affect the viability of existing housing.

The Plan needs to confront the possibility of radical spatial transformation in the face of sea level rise in excess of 2m over the next 100 years. Rather than a 30 year plan, a better framing could be a series of 5-10 year sequences, with clear check-points in relation to climate, population and other uncertain variables that shape the Plan.

Submission: Use the most up to date information, and provide for regular periodic reviews and updates over the life of the Plan, to assess risks to existing housing from storm surge and sea level rise, as well as to assess the suitability of sites for new developments, and factor impacts on existing housing into any assessment of housing capacity.

Focus on transport and land use integration to build community and reduce emissions

Wellington's inner-city locations are already medium density neighbourhoods, have very low levels of car dependence and good local access to services. This is a key strength of these communities. There is extensive scope to replicate these inner-city patterns of dense housing and local accessibility across the city.

A key difference between the 2015 Urban Growth Strategy and the draft Spatial Plan is that the draft Plan provides for widespread removal of height and other controls in already dense areas, allowing developers to cherry pick sites. This will result in a small increased in density in areas which already have low emissions due to low car dependence. At the same time it risks undermining the coherence, diversity and resilience of those areas by enabling poorly located developments which affect a wide area.

Emissions-reducing densification by contrast seeks to create more medium-density urban villages across the city and link these nodes with high quality, frequent and reliable public transport. These 15-minute nodes need to be of a sufficient scale to support increased localisation of activities and services. Such localisation enables existing as well as new residents to meet their needs locally. This is a key driver of lower emissions from transport and land-use integration and nodal density.

Retrofitting of lower density neighbourhoods with a strong local core is key to reducing car dependence across the city as a whole. With more local services and amenities, more needs can be

met through local walking and cycling trips. Linking these nodes with quality, reliable and frequent public transport then enables a greater share of longer journeys to be made by public transport rather than using private motorised transport. Crucially this model of linked 15-minute nodes benefits *existing residents as well as new inhabitants*, and it is this broad impact that enables such an approach to meaningfully reduce car dependence and transport emissions.

Any revised spatial plan needs to be much more explicit about increasing density in a nodal fashion; creating more medium-density urban villages across the city and linking these highly walkable nodes with high quality, frequent and reliable public transport.

Submission: Make creating a network of 15-minute urban villages, linked by great public transport a centrepiece of the approach to densification and spatial evolution and recognise that this will require a more active planning approach than simply widespread deregulation of height limits.

Recognise the emissions benefits of existing wooden housing

Wooden housing built from long-life native timbers is a carbon store. Properly maintained this material will retain embodied carbon for centuries. Widespread demolition and transfer of wood “waste” to landfill will result in this carbon sink becoming a source of landfill methane through slow anaerobic decomposition. Given the trajectory of emissions at present and the goals of Te Atakura, such an increase seems unwise. By comparison demolition concrete used as clean-fill does not release embodied carbon at a significant rate.

A spatial approach which focuses intensification first on the types of under-utilised sites identified earlier³ will create comparatively little demolition waste compared with a process which enables widespread demolition of wooden homes. That which is created is more likely to be largely concrete. Consequently a more sequenced and focussed approach is likely to generate fewer landfill emissions.

The construction industry is a source of significant emissions, and those from new construction will arise under both the current “deregulate and demolish” model and the more focussed approach proposed in this submission. Lower emissions related to demolition is a notable gain from shifting to the approach proposed in this submission. The combination of:

- 1) greater potential for land-use and transport intensification under the more sequenced and focussed approach and
- 2) lower landfill waste emissions

means greenhouse gas emissions are likely to be significantly lower under the approach proposed in this submission.

Submission: Evaluate the impact of allowing increased demolition of character wooden buildings on landfill methane emissions, and assess the overall emissions impact of a sequenced and focussed approach to intensification as compared with the current broad deregulatory model.

³ ie vacant land, vacant commercial buildings suitable for residential conversion, land used exclusively or largely for parking or vehicle storage, land occupied by low quality 1-2 story post-1960 commercial buildings

Identify areas for potential special projects

Spatial analysis in Wellington has long-recognised several sites which offer opportunities for comprehensive redevelopment due to their scale and location. Most are relatively resilient in the face of sea level rise of up to 2 metres.

These sites offer an opportunity to demonstrate, and learn from, large scale redevelopment within a cohesive overall plan. These sites offer opportunities for quality mixed use, mixed density development with a significant affordable housing component. Identifying these sites within a revised spatial planning framework is a key first step towards realising the opportunities such sites offer.

These sites are:

- Johnsonville: the area bounded by Moorefield Road, Broderick Rd, and Johnsonville Rd. sometimes called “Johnsonville Mall” for short, although the site encompasses more than the actual mall.
- Adelaide Rd and surrounds between the Basin Reserve and John/Riddiford St intersections, extending West as far as King St, and East to the boundaries with Government House.
- Kilbernie – the large area currently occupied by low-rise commercial buildings and parking space loosely defined by (and extending slightly beyond) Evans Bay parade, Rongotai Rd, Mahora St, Coutts Sr and Bay Rd.

All these sites are of sufficient scale to provide a step change in the level of local activity, supporting genuine localisation, affordable housing, and transport/land-use integration. They also offer the potential to demonstrate the benefits of density done well. In addition to a development framework, any masterplan needs to identify anchor heritage buildings, greenspace, and consider shading, accessibility and wind effects as a minimum.

Submission: Identify priority sites for large-scale intensification subject to master-plan driven development, with appropriate provision for heritage, greenspace, sunlight and wind, and accessibility, starting with

- **Johnsonville Mall and surrounds**
- **The north end of Adelaide Rd**
- **Kilbernie retail and parking area**

Align transport and land use integration, infrastructure investment and the timing of special projects

Wellington needs significant infrastructure investment and renewal to adequately manage the three waters for existing residents. Increased nodal intensification and the development of special projects will create further pressures on infrastructure. This provides further support for a phased approach. Linking intensification with water infrastructure as well as transport infrastructure is critical to the feasibility of intensification, as well as the practical coordination of construction. Data and information on water infrastructure needs and the way this affects potential development is another key aspect of a holistic spatial plan for Wellington.

Submission: Use the spatial plan to signal and spatially align transport investment, land-use intensification, and three-waters investment.

Identify transitional areas and consider boundary changes to achieve this

At present the District Plan provides for transitional height zones adjacent to the Central Area. These fulfil an important function and contribute significantly to the lived experience of walking between the city and the inner-city suburbs. There are many instances of the value of, and need for, transition. The section uses south-west Te Aro to illustrate the general point.

The transition operates reasonably effectively in the south-western corner of Te Aro (aside from roading severance). This is due in part to the large number of heritage buildings as well as the transitional zoning. Spatially effective transition requires careful consideration of the street-level experience including experiences of safety and enclosure, views, shading and the ability to perceive green space on the surrounding hills. The current height limits and planning approaches in this area were developed through extensive Environment Court mediation.

Large parts of this central south-west transition area are included in the central area under the draft Spatial Plan. This reflects the fact that the central area boundary follows the old 1960s motorway designation in places rather than a boundary based on consideration of spatial factors and lived experience. The Spatial Plan suggests that these transitions will be removed and/or boundary heights significantly increased, and a minimum height of six metres will be extended up to the edge of the central area.

An alternative approach is to move the edge of the Central Area inwards to enable a softer transition. An appropriate foundation for maintaining such a spatial transition could be provided by moving the Central area boundary inward to run along Caro Drive from Taranaki St to Victoria St, down Victoria St to Vivian St and then up Vivian to join the current boundary.

There are other areas where boundary effects need explicitly consideration and treatment, and this needs systematic analysis within any spatial plan. Maintaining soft edges and developing transitional experiences is a key part of effective spatial planning.

Submission: Modify the spatial plan to support, maintain and develop transitional experiences between areas of significantly different height, notably but not exclusively at the boundary of the Central Area, and adjust boundaries to enable such a transition to be maintained and developed – for example in south-west Te Aro, move the Central area boundary inward to run along Caro Drive from Taranaki St to Victoria St, down Victoria St to Vivian St and then up Vivian to join the current boundary.

Align height limits with the landscape and street orientation

Consideration needs to be given to the spatial arrangement of heights within the Central Area, and the nature, alignment and width of the street on which buildings are located. Some streets are wide and aligned in such a way as to enable greater height while maintaining good natural light at street level. In others, notably the rich network of small streets in southern Te Aro, there is a significant risk of creating dark canyons which are neither hospitable nor safe.

The underlying topography is uneven and creates complex interactions between sites. Currently the spatial plan focuses on height at the expense of other matters. At a policy level the spatial plan needs to recognise the importance of integrating heights, street width and alignment and the quality of the public experience on these streets, including sunlight, views and experience of greenspace. This is critical in the central area and important in other areas where higher building heights are proposed such as Newtown.

Submission: Modify blanket application of height limits and minimum heights in the Central Area, Newtown (and elsewhere as needed) so that that heights are related to underlying topography, street width and alignment and the quality and safety of public experience on streets.

[Incorporate wind and shade effects at the spatial planning stage](#)

Wellington has a complex and folded landscape, which affects the distribution of light and shade. Wind, sometimes very strong, is a fact of life in Wellington, and winds are likely to grow stronger as a result of climate change. Wind can be a threat to physical safety as well as affecting the experience of public spaces. The ecological and social viability of greenspaces depends on them receiving sunlight and being somewhat sheltered from wind (unless explicitly “coastal” or “hilltop” sites). Sunlight, shading and wind effects are a critical part of spatial planning policy rather than matters of detail to relegate to a District Plan framework. Any spatial framework needs to recognise and provide for:

- protection from shading and access to sunlight in areas of where building heights may rise,
- protection from adverse wind effects as a result of increased building heights
- creation of more sunny, sheltered greenspace

Submission: Explicitly recognise and provide for the effects of shading and wind hazard in setting policies for the location and form of buildings of varying heights, and the location of greenspace, within a revised spatial plan

[Provide for additional accessible green space](#)

Densification and increased heights in the Central Area has proceeded with very little consideration of greenspace. The Spatial Plan risks continuing this approach across the wider city as well.

There is no mention to date of the fact that intensification to date in Wellington has often resulted in a loss of greenspace on private land, often adjacent to and interacting with public land. The broad deregulatory approach of the draft Spatial Plan is likely to worsen this as demolition and site clearance, coupled with greater site coverage, normally result in a loss of greenspace. Auckland has lost a third of its large trees on private land, and Wellington is likely to experience similar effects.

There is clear evidence of the health benefits and the potential ecological benefits of green space. Greenspace matters both in terms of people’s ability to see it from the street and their homes and in their intimate experience of the street as well as their ability to easily access greenspace. Other submissions will touch on this in much more detail.

The value of greenspace is discussed in the draft Spatial Plan, and there is a useful discussion of the potential to reconnect with the natural environment and daylight Wellington’s hidden network of streams.

Unfortunately, there is no explicit provision for additional greenspace within the document, no spatial identification of streams for daylighting, and no explicit identification of how ecological corridors may come into being. The plan provides detailed spatial guidance around heights but does not address these other matters with the same level of granularity; indeed it barely touches on them at all in many areas.

The spatial plan implicitly places a heavy reliance on being able to walk into the green hills surrounding the inner-city. However many people in New Zealand experience impaired mobility and many people with children have limited ability to traverse large distances to experience greenspace.

Overall the spatial plan needs to provide guidance on the local provision of a variety of types of greenspace, and directly address ecological corridors and daylighting if the aspirations in the Plan are to be realised.

As noted earlier, the likely loss of greenspace arising from the removal of minimum parking requirements, and consequent impacts on people ability to see greenspace needs to be evaluated.

Submission: Explicitly

- iv. provide for people to see and access a variety of new as well as existing greenspaces throughout the city, especially in relation to areas of densification and increased height;**
- v. provide for ecological corridors and potential opportunities to daylight parts of streams; and**
- vi. assess the effect of different models of intensification on retention or loss of greenspace on private land.**

...Recognise that “character” is grounded in a broader idea of heritage...

One of the quirks of Wellington’s approach to planning is the sharp distinction drawn between character and heritage. While one can imagine character unrelated to heritage, the “character areas” in Wellington are in fact areas of historic heritage. The focus on character appears grounded in administrative convenience; character is a design issue and a focus on character enables an assessment of resource consent applications against design guides, and character assessments for an area. An unfortunate effect is that it focusses discussion around these character areas to matters of built form and the built environment, within which “heritage areas” and “heritage buildings” exist as specific sites and groups of contiguous sites.

At a policy level, however character and heritage are dry labels for people’s sense of connection to community and landscape and the ability read stories in our surroundings. Human relationships and human wellbeing are stronger when people have a connection to the landscape and its stories as they walk through it. Historic heritage both enables people to, for example, tell personal stories (“I met your mother/father at a party in that room there”) and to imagine and envision the passage of time (“when that was first built, people would have come and gone by horse”)

This broad perspective is reflected in the Resource Management Act definition of “historic heritage”

historic heritage—

(a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures, deriving from any of the following qualities:

(i) archaeological:

(ii) architectural:

(iii) cultural:

(iv) historic:

(v) scientific:

(vi) technological; and

(b)

includes—

(i) historic sites, structures, places, and areas; and

(ii) archaeological sites; and

(iii) sites of significance to Māori, including wāhi tapu; and

(iv) surroundings associated with the natural and physical resources

This broad perspective also emerges in the discussion on page 32 of the existing Urban Growth Plan, which recognises the positive contribution heritage and character make to Wellington. Historic heritage in this broad view encompasses the intangible cultural heritage tied to places and structures, but extending beyond them.

The RMA definition offers policy guidance as well as providing a statutory definition. Rather than focussing narrowly on character, a focus on historic heritage and the idea of “living history” offers a much richer palate for a spatial plan. Such an approach would encompass the rationale for protection of an area such as Holloway Rd, which has a rich social history intertwined with and mirrored in its built form.

An alternative approach to the deregulatory frenzy of the draft Spatial Plan could be an evolutionary approach grounded in community democracy and the broad range of ideas encompassed by historic heritage. Many of the “character” areas have a history of social diversity and affordable housing, and this is as much a part of their history as the built form. For some, the intimate and distant experience of greenspace is a key part of their cultural history.

The Maori history of Wellington has relatively little exposure in discussions of heritage; in a nation founded on Te Tiriti o Waitangi, this history and its grounding in the whenua need to be recognised as a fundamental part of historic heritage. Enabling mana whenua to retell their story in the land and built environments, in such ways and to the extent they wish to do so is a fundamental part of living heritage.

At the planning stage, one way of protecting historic heritage from *inappropriate* development is to enable participatory decision-making around the nature of *appropriate* development. Such an approach could be coupled with incentives for faster realisation of latent capacity, with appropriate design controls, on the under-utilised sites within these areas (refer “Basic Information” or footnote 3 for a list)

Such an approach could look like this:

1. Recognise and value, as the 2015 Urban Growth Strategy does, the positive contribution of historic heritage and character to the city as a whole.
2. Use the concept of historic heritage to enable demolition controls across the whole of the areas currently identified as character areas, as well as maintaining the existing heritage sites and “areas” within these communities, and actively working to incorporate Maori history into this framework.
3. Within these areas identify an initial range of under-utilised sites (as defined earlier re vacant sites etc) suitable for appropriate intensification and implement measures for encouraging the more rapid realisation of these opportunities.
4. Use the concept of historic heritage to frame appropriate development (cf “inappropriate development”) in terms of design and relationship to surroundings but also in terms of

maintaining, for example, affordability as part of significant new developments, and maintaining the experience of greenspace.

5. Create and resource a co-design process for these communities, mana whenua and the Council to identify further areas and opportunities for appropriate intensification, stronger protection, and other forms of change, enabling the process to become part of the living history of each community.

Submission: Develop an approach to change in the character areas ground in the concept of living heritage, where demolition controls are maintained, appropriate development is initially focussed on suitable sites without character buildings, and the evolution of these areas is shaped through participatory co-design.

... and develop a phased approach to both development and the updating of core data.

Population growth and climate change impacts are areas of major uncertainty; better information will emerge through time. There is an opportunity to recognise this and explicitly develop a sequenced approach to Wellington's development. Such an approach allows for "learning by doing" and the incorporation of new information as it becomes available. The timing and location of infrastructure investment provides a further basis for sequencing and phasing of intensification.

The current draft Spatial Plan adopts a broad brush deregulatory approach and lacks any guidance as to the sequence of information. A more staged approach to intensification could focus on a sequence of "win-win" developments aligned with a programme of infrastructure investment. The initial focus would be on underutilised development capacity and specific large sites (both discussed elsewhere) which are robust to a range of climate impacts.

Such an approach may well enable more rapid development of affordable housing initiative and more clearly contribute to a net increase in housing. It can also help avoid irreversible and inappropriate damage to heritage and character, and ongoing conflict over intensification across the city. At the same time this approach will enable more time to be spent on co-design of initiatives ranging from possible further intensification in some areas, through to the creation of ecological corridors.

There is ample scope to focus initially on underutilised capacity on sites which are robust to significant climate impacts, support transport and land-use intensification, avoid the loss of both heritage and greenspace, have or can be provided with adequate three waters infrastructure and can be intensified without adverse shade and wind effects. Identifying these sites, and developing the tools to encourage development on them, ought to be a key priority for further work.

Such an approach could be expressed using a series of 5-10 year windows, with specific processes and projects to be undertaken, and clear milestones eg for the provision of affordable housing and for the updating of core data; this would turn the spatial plan into more of a rolling, living document owned by those it affects.

Submission: Develop an explicit sequence of intensification, starting with climate robust "win-win" sites, and build in regular reviews of this sequence to support learning by doing, the regular incorporation of new information, and co-design processes for key aspects of the Plan.

Value Aro Valley and its people

Aro Valley is a classic example of “living heritage”

Aro Valley is a classic example of living heritage. Physically it has a largely intact Victorian and Edwardian housing stock having been supplemented by more modern development that is largely in keeping with the overall character of the area (with some notable exceptions). There has been extensive adaptive re-use of buildings and ongoing minor renovations and restoration work on both rental and owner-occupied properties.

...with a rich social and cultural heritage...

The area has a rich and complex social history from the time of the signing of Te Tiriti o Waitangi; throughout this time it has had a cohesive and dynamic community life as well as serving as the home for a diverse range of people. Stories from older residents, now deceased, suggest that at least in the early 1800s it was primarily used by Maori for food growing on the rich sunlit slopes to the south of the Waimāpihi stream.

..and extensive hidden waterways...

Piped streams, some closer to small rivers, are a major feature of Aro Valley. Currently there is a grating by the western entrance to Aro Park through which one can hear the waters of the Waimāpihi stream as it flows through 2 metre diameter pipes under Aro Park. Sometimes it is quiet and sometimes it is loud, but it is always present. Achieving this took many years of persistence by Aro Valley residents in the face of sometimes ridiculous arguments from Wellington City Council.

..as well as proud history of creating its own destiny.

Buried under the base of a eucalyptus tree in Aro Park is a plaque which says “Aro Park exists because the people of Aro Valley fought long and hard for it”. At various times over the last sixty years, Wellington City Council has sought to minimise and devalue the value of Aro Valley the place, and Aro Valley the community. In the early 1970s a draft Comprehensive Urban Renewal Area sought to replace the “dilapidated” housing stock with concrete high rise buildings (that would no doubt be filled with asbestos and deemed a quake hazard today) lining a four-lane motorway to Karori.

By the mid-late 1970s, community resistance and the first oil shock put paid to those plans. Instead of demolition, the “decrepit” buildings deemed at the end of their life were actively restored by the community, in a first of its kind project for New Zealand.

Out of this grew Aro Valley Community Council and the demands for Aro Park, which was created by locals ripping up asphalt and planting trees on the old school site now known as Aro Park. The then Mayor, Michael Fowler, commented that he had learned the limits of power from this experience.

Aro Valley was excluded from the first round of character areas, and its current status and the wording of design guides was only secured through a series of mediated Environment Court appeals. At one point Council surveyed residents asking if they wanted “high, low or medium” levels of regulation in an attempt to dissuade residents from supporting the creation of an Aro Valley character area. It was only in the mid-1990s that Aro Valley was even acknowledged as a distinct suburb by Wellington City Council.

The current Aro character sub-areas omit important groups of buildings...

There are a number of areas of character, most of which are identified within the Boffa Miskoll study but have not been identified in the draft Spatial Plan. These include

- the north side of Aro St, west of the suburban centre as far as the start of the poorly designed new dwellings, and then from the new dwellings opposite the bottom of Durham St, west across Adams Tce to the end of the housing on Aro St, adjacent to the Town Belt.
- The south side of Aro St, west of the suburban centre, across Durham St as far as the former Wellesley Church at the end of Aro St adjacent to Polhill Gully.
- Adams Tce – especially the lower reaches on both sides and the West side
- Holloway Rd – Holloway Rd is within the suburb of Aro Valley and is an area of unique heritage and character. The Boffa Miskoll assessment does not appear to have considered the fabric of this area of referenced the descriptions in the current operative design guide.
- Landcross St – which is functionally part of Aro Valley, visually and aesthetically coherent, and whose rear elevations define a key visual experience within Aro Valley.

These areas are all of high character value, reflecting the overall coherence of Aro Valley, and need to be included as areas where demolition controls apply.

[... the failure to protect Holloway Rd is a major omission...](#)

More broadly, the omission of Holloway Rd, shows the importance of grounding demolition controls in a broader conception of heritage rather than a narrow conception of character. Even at a narrow character level the Boffa Miskoll report appears to ignore the characterisation in the Council own design guide when it compares Holloway Rd to the rest of Aro Valley. The design guide states

Holloway Road is one of the early areas of NZ European settlement in Wellington and retains much of its original character and built form. The area of Holloway Rd and connecting streets is visually contained and surrounded by sloping topography and significant areas of greenery. Overall buildings in Holloway Rd are generally sited towards the front of the site with a variety of frontage setbacks, and building form, with clustering of similar layouts observed. The buildings are generally of a modest scale with a degree of age consistency and a strong connection with the surrounding vegetated valley walls.

Three parts of Holloway Road can be identified which correspond approximately to the areas in Appendix 1 to Chapter 5, Residential Areas.

The entrance to Holloway Road - Buildings are largely single storey and there is strong consistency of form and age, which is experienced at an intimate scale. This area, including a number of listed heritage buildings, has a strongly defined character that has remained relatively consistent since the late 19th Century.

Mid Holloway Road - There is an increase in diversity of form and scale of built structures, especially on the eastern side where two storey buildings become more common. On the western side, the consistency of age, form and scale continues from the entrance area and the elevated section of Haines Tce contains a cluster of buildings of similar age and form. Together with the glimpses of Holloway Rd, these define a visual introduction to Aro Valley from the eastern approach.

The end of Holloway Road and Carey Street - This area offers the most diversity of form and age with buildings being of a modest or moderate scale and generally aligned with the landscape and the street frontage. There is some clustering of buildings of similar age and form on the western side. Vegetation coverage is often significant and the vegetated valley walls are a dominant part of the visual experience.

Holloway Road has a distinct and unique character, reflected in its existing buildings and the stories they tell. Demolition controls need to be maintained for Holloway Road as at present or Wellington risks losing a unique and vibrant part of its story.

[.. and there is no coherent vision for the Valley as whole.](#)

The proposals in the draft Spatial Plan also seem to lack consideration of the coherence of experience of the Aro Valley from the perspective of people within it. Rather it provides for isolated clumps of “character”.

Current Council policy and plans recognise the heritage value of the Valley within the wider story of Wellington. The current design guide states:

“Aro Valley is one of the city's oldest suburbs, and is one of the most architecturally distinctive and historically consistent built areas in Wellington.”

The Spatial Plan removes demolition controls from around three quarters of the properties in Aro Valley. This is an inappropriate and unnecessary transfer of agency from the public realm to private land owners. The heritage value of the Valley as a whole deserves both recognition and protection.

[Aro Valley has the potential to lead by example.](#)

Aro Valley includes a number of sites that fall within the categories identified earlier as underutilised development capacity. These are possibly enough to provide the level of “expected” new housing set out in the late September estimates of capacity. Aro Valley can add both infill and intensification without the demolition of heritage and character buildings.

In the broader context of living heritage discussed earlier, Aro Valley is a prime example of an area over which demolition controls ought to be retained, appropriate intensification focussed on underutilised sites, and a co-design process undertaken with the community to shape its future evolution.

Submission: Rectify the omissions from the current-sub area proposals for Aro Valley, retain demolition controls over the same area as at present (including Holloway Road), focus intensification on underutilised sites and under a co-design process with the Aro Valley community to help shape its future.

Appendix 1 Process Matters for Review

[There are real questions whether the Draft Spatial Plan was ready for public release](#)
Material that formed part of the consultation was being continuously updated during the consultation period. Other submitters will have commented in detail on specifics.

[Elected officials deserved the change to endorse or reject policy changes](#)

According to the Housing and Business Development Capacity report for Wellington, the DSP appears to have begun as a review of the 2015 Urban Growth Strategy. At some point, plans altered radically.

The document contains broad objectives similar to those in the Urban Growth Strategy. In detail, however it focuses on building height deregulation across large areas of the city, and the removal of demolition controls from around three quarters of the areas to which they currently apply. The document also radically reframes the value of heritage and character to the city, rather than following the policy direction set in the Urban Growth Plan or the Council's heritage strategy. These are explicit policy choices that ought to have been made by councillors at the outset.

[Data and evidence was missing from the public conversation](#)

Data and evidence are fundamental to developing a draft Spatial Plan, yet there is a curious lack of both in this process. Some examples of information that could have informed a spatial plan conversation include

- Data on housing and population growth rates, and the nature and type of housing being built and consented in Wellington
- Evaluation of the effects on housing affordability of the deregulation of height limits and site coverage in both the Central Area and Oriental Bay.
- Information on the population density and demographics of existing suburbs and how these might be expected to change
- Assessment of the reasons why development capacity in currently upzoned areas has not been realised as housing.
- Assessment of the wealth of evidence on the links between community resilience, urban form and collective agency

[A crucial phase was omitted from overall public consultation](#)

Following an initial survey which indicated a preference for "up rather than out", the Council appears to have settled on the approach set out in the Draft Spatial Plan (widespread deregulation) at a very early stage. Other options, such as the approach set out in this submission (which draws heavily on international evidence) were not evaluated. Indeed Council officers have acknowledged there was no options development process in terms of *how* up and out might occur.

The next step after establishing a general preference for up rather than out ought to have involved testing a range of options looking at factors such as:

- Generalised versus targeted approaches to increased height
- Weight given to sunlight and wind effects
- Location options within the broad scope of Option 2
- Minimal to extensive removal of demolition controls
- Use of incentives to develop specific sites versus a more *laissez faire* approach

People could have been presented with options and the effects of alternative options described. This approach is very common prior to the development of details at the level of the Draft Spatial Plan.

Risks associated with the National Policy Statement on Urban Design were not raised with councillors

Officers have stated they were in dialogue with central government about the NPS-US prior to its finalisation. Much of the design of the Spatial Plan is attributed to the NPS-UD, but officers were proposing sweeping changes to character demolition rules many months prior to the release of the NPS-UD. This suggests that they have been informed of the direction of the NPS-US for some time.

There is a clear conflict between the NPS-UD and the Urban Growth Plan prepared by Wellington City Council under the Local Government Act. This has arguably been apparent since a draft NPS-UD was released by the Government in 2019. Given this, it is surprising that no advice was presented to Councillors highlighting the risk of conflict and presenting options for Councillors to engage in dialogue with Central Government. An obvious option could have been to exclude Wellington from the NPS-UD on the grounds it already has a much higher level of density than other cities covered by the NPS-UD.

Again elected officials deserved the opportunity to make informed decisions on these matters well before the release of the Draft Spatial Plan.

The framing of consultation material could have been more transparent and balanced

The framing of the discussion needs greater transparency and balance. The framing downplays the significance of the proposed changes and instead focuses on generalities. It also alludes to the idea that these changes are both necessary and possibly sufficient to address the significant housing issues experienced by Wellington. This has the potential to both polarise and significantly bias the public response, while reducing scope for quality public engagement.

Some examples

- The document and consultation fails to make clear the following:
 - housing affordability was not a factor in the design of the proposed spatial plan
 - no assessment of the distribution of housing quality issues has been conducted
 - no assessment of the effect on the rate or form of housing construction has been undertaken
 - no assessment of the impact on greenhouse gas emissions has been conducted.
 - no other options for going “up rather than out” were developed and considered prior to this proposal being developed, and so there may well be other, better ways to achieve the same goals
 - no evaluation of prior deregulatory measures has been undertaken
 - no assessment of the reasons for the lack of development on previously upzoned land has been undertaken.
- the consultation material uses descriptions drawn from the Spatial Plan objectives to inform people as part of questions about whether they agree with certain positions. This material presents statements as though they will happen on the basis of the Spatial Plan. However, many of these statements are not actually supported by policies or proposals in the document.
For examples,

- there are statements about greenspace, safety, water sensitive design (and many other points) which have no policy or implementation support in the detail of the document;
 - the document claims character sub-areas are those of highest character when many areas of equivalent rating are excluded
- Questions are not neutrally framed, evidence is not presented in support of claims and misleading numbers are used. For example, the website statement asks whether people agree with an approach, and if not, how they distribute 80,000 people across the city. This is a confrontational question, especially given the dubious provenance of “80,000” and does not invite creative problem solving. For most of the consultation, there was no data on the extent of *enabled* capacity under the DSP, although it was clear the proposals enables significantly more potential capacity than was needed for even 80,000 people over 30 years.
 - The consultation material downplays impacts and talks up benefits, without data or analysis. There is little information on putative benefits in relation to housing. Major changes of policy are often implicit. For example, nowhere does the document explicitly state and seek feedback on core matters such as proposals to
 - Allow as of right demolition of most (~75% on average) buildings currently subject to demolition controls, while
 - significantly weakening the ability for communities to participate in decisions about demolition, character, bulk and location and
 - significantly limiting the ability of council to control these matters

While implicit, these matters are not the focus of attention, yet they are the core of the changes as compared with the Urban Growth Strategy.

At its heart the Draft Spatial Plan, as compared with the Urban Growth Strategy 2015, represents a wholesale transfer of rights away from communities, and a rejection of the idea that agency over the future is important to wellbeing for communities. These fundamental changes have not been discussed by the Council at a political level and no feedback was sought on these over-arching points; instead the DSP framing instead invites people to focus on a false dichotomy between housing and heritage.

ENDNOTES

ⁱ <https://forecast.idnz.co.nz/wellington> - accessed 4/10/2020

ⁱⁱ This can be applied to the 2020 estimate to get the 2043 estimate as follows $214537 \cdot (1.00650)^{23}$. The result of this is 249,011 which is equivalent to 248.953 after allowing for rounding in the growth rate.

[REDACTED]

From: [REDACTED]
Sent: 05 October 2020 12:46
To: BUS: Planning For Growth
Subject: Submission - Draft Spatial Plan for Wellington City
Attachments: Submission Form on Our City Tomorrow Thatcher Cres 3.10.20.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Blue Category

Hi

Please find attached submission on the Draft Spatial Plan for Wellington City.

Please note:

I am the designated spokesperson for the Thatcher Crescent Residents

I would appreciate the opportunity to speak to this submission on behalf of the Thatcher Crescent Residents

Please feel free to contact me if you have any queries at all.

Best regards

Dan Coffey

[REDACTED]

Submission Form on Our City Tomorrow: Draft Spatial Plan for Wellington City

Personal information

| | |
|---|---|
| Name (first and last) (Mandatory) | Email address (Mandatory) |
| Daniel Coffey | [REDACTED] |
| Postal address | Suburb (Mandatory) |
| [REDACTED] | Crofton Downs |
| Phone number | |
| [REDACTED] | |
| Age range (Mandatory) (select from the dropdown below) | Household (Mandatory) (select from the dropdown below) |
| [REDACTED] | [REDACTED] |
| Preferred method of contact | |
| Email | |
| I am making this submission (Mandatory) | |
| Group submission | |

I am the designated spokesperson for the Thatcher Crescent Residents

I would appreciate the opportunity to speak to this submission on behalf of the Thatcher Crescent Residents

To what extent do you agree or disagree with what is proposed with intensification in the Central City. **Click the image to expand the fact sheet or [view the full draft spatial plan here](#)*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs. **Click the image to expand the fact sheet or [view the full draft spatial plan here](#)*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs. **Click the image to expand the fact sheet or [view the full draft spatial plan here](#)*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution? *

- Strongly Agree
- Agree

- Neutral
- Disagree
- Strongly Disagree
- Not sure

If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

Firstly, it needs to be established there will be 80,000 people and this is by no means certain. The DPS states 50,000 to 80,000 people, so this is a worst-case scenario.

Additionally, societal changes brought about by the “Covid affect” mean these predictions are less certain than ever.

Intensification around the rail corridor and the outer suburbs has the potential to completely change the nature of those areas.

The real concern as discussed later is the numbers will not eventuate and DPS will have allowed intensification and disruption in areas where it simply wasn't necessary.

To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs. **Click the image to expand the fact sheet or [view the full draft spatial plan here](#)*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you? *

As occupants of the outer suburbs, as a group, we don't believe we have the detailed knowledge necessary to advise the inner-city folks on what's in their best interests

What amenities would you want to help create a vibrant suburban centre? (please pick your top 5 from the options below) *

- Proximity to parks and open space
- Access to public transport
- Public/shared spaces
- Commercial activity (retail, cafes, local businesses)
- Employment opportunities
- Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.)
- Infrastructure (stormwater, water supply, wastewater)
- Social services and community facilities
- Medical facilities/centres
- Access to cycleways/routes
- Walkability within the centre
- Easy walking distance to the centre

Other (please specify)

We believe all the above is desirable but as an underlying concept vibrant suburban centres should be places where people enjoy living, walking and playing. Done properly, they would meet most people's day-to-day needs and ideally, avoid the need **and desire** to own a motor vehicle.

What amenities would you want to see around future mass rapid transit stops? (please pick your top 5 from the options below) *

- Public shared spaces
- Landscaped spaces/plantings
- Parks and playgrounds
- Shops and businesses
- Cafes and restaurants
- New housing
- Community facilities (libraries, community spaces, social services, etc.)
- Child care
- Medical facilities/centres
- Bicycle parking

Other (please specify)

Once again, we believe all the above is desirable but as an underlying concept, vibrant suburban centres should be places where people enjoy living, walking and playing.

Done properly, they would meet most people's day-to-day needs and ideally, avoid the need **and desire** to own a motor vehicle.

To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener. **Click the image to expand the fact sheet or [view the full draft spatial plan here](#)*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb? *

Our local park and streets for walking

What amenities or facilities were missing or could have been improved? *

Apart from the train station, Mitre 10 and supermarket, Crofton Downs has very little in the way of community amenities. It couldn't be compared to a hub such as Johnsonville or even Khandallah or Ngaio.

What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

We believe there will be some growth in population and the plan broadly addresses the requirements for the central city. As such, initially at least, we believe all DPS amendments should be restricted to the central city area plus the main city Hubs i.e. Miramar, Kilbirnie, Newtown, Berhampore, Johnsonville and Tawa.

The DPS is a response to a growing population and regrettably, things need to change.

In general, we believe intensifying these areas will provide maximum benefit for minimum disruption.

The central city and hubs such as Miramar, Kilbirnie, Johnsonville and Tawa are generally flat and very walkable for people with low to average mobility.

There is already considerable multistorey development dotted throughout the central city area and for the most part, the DPS recommends more of the same.

While we sympathise with the affected central city residents, detached single or two level housing within easy walking of the city is a luxury Wellington can no longer afford.

What would you change or improve?

1. Remove requirements for Multi-Story Building Construction, near the Stream, along Silverstream Rd (Crofton Downs)

Supporting statement from John O'Donnell, Architect and Structural Engineer (supplied with his permission)

Silverstream Rd – multi-story building - high risk seismic hazard:

Any Multistorey Building Construction, near the Stream, along Silverstream Rd (Crofton Downs), will be a High Risk Seismic Hazard, for Failure during an Earthquake.

The soil throughout this area, is soft wet clay. It will become liquid, in an earthquake, with the weight bearing load of a multistory building on top of it.

This Silverstream Rd area, is equivalent to (though worse than), the soil, associated with the underground stream, running from Molesworth St, across Thorndon Quay, under the train station, to the harbour.

4x multistorey buildings (61 Molesworth, Defence, Womens Affairs, BNZ, Statistics NZ) have been demolished, as a consequence of the Kaikoura Earthquake.

The foundations, and structure of these buildings, became Non-Compliant, due to the foundation soil liquidity, under load, during the earthquake.

I (John O'Donnell) make this statement, as an architect and structural engineer, from my work experience in areas such as: programmer for Structural Design Loads software for Ministry of Works; analyst for Building Act/Code Determinations division of Dept of Building & Housing; building industry expert advisor at BRANZ Ltd (Building Research Assn).

2. Minimum 6 story developments must be great places to live

DPS statement:

- Minimum 6 story developments with no requirement for car parking needs to be replaced with
- Minimum 6 story developments with no requirement for car parking where occupants can enjoy great lifestyles without cars

3. Adopt a staged approach

Consistent with the requirements of the NPS and the DSP, the Thatcher Crescent Residents have concluded the following vision for our city.

| NPS Objective 3 | The Draft Spatial Plan | Thatcher Crescent Residents vision for our city |
|---|--|---|
| <ul style="list-style-type: none"> • Near a centre, zone or other area with many employment opportunities • Well-served by existing or planned public transport • High demand for housing or for business land | <ul style="list-style-type: none"> • Compact • Inclusive and connected • Greener • Resilient • Vibrant and prosperous | <ul style="list-style-type: none"> • Creating great places to live, walk and play • Building for a walkable future • Enjoying great lifestyles without cars • Minimise disruption |

Implementing the DSP in its current form will be very disruptive and change the nature of many of our suburbs.

While we all accept change is necessary, it would be tragic to look back in 30 years' time and realise that much of this disruption didn't need to occur.

On this basis, the Thatcher Crescent residents recommend a staged approach that achieves NPS & DSP outcomes but minimises unnecessary disruption

| Classification | Description |
|----------------|---|
| Stage 1 | Easy walking within 15 minutes of CBD (Lambton Quay or Courtenay Place) |
| Stage 2 | Flat easy walking within 10 minutes of comprehensive shopping and amenities |
| Stage 3 | Flat easy walking within 10 minutes of good shopping and amenities |
| Stage 4 | OK walking withing 10 minutes of modest shops and amenities |
| Stage 5 | Non – compliant with NPS Objective 3. Good access to transport but not near a centre, zone or other area with many employment opportunities. Little or no immediate access to shopping and amenities. People will be more inclined to need or want cars |

| Stage 1 | Stage 2 | Stage 3 | Stage 4 | Stage 5 |
|-----------------|--------------|------------|--------------|----------------|
| Wellington City | Miramar | Island Bay | Ngaio | Simla Cres Stn |
| | Kilbirnie | Karori | Northland | Crofton Downs |
| | Johnsonville | Khandallah | Seatoun | Khandallah Stn |
| | Newtown | Newlands | Churton Park | Raroa Stn |
| | Tawa | | Strathmore | |
| | Berhampore | | Brooklyn | |
| | | | | |

The DSP has embraced the NPS in its entirety and is taking it almost completely at face value. To adopt it in its current form would allow the indiscriminate dotting of multistorey developments all over Wellington regardless of the impact on the local environment.

Adopting the plan in stages as set out above would control the flow of development and ensure suburbs were not disrupted unnecessarily. Also restricting development initially to Stages 1 and 2 are most likely to deliver our vision of “Enjoying great lifestyles without cars”

In conclusion, we can - and should - be much smarter about it.

4. Remove requirements for Multi-Story Building Construction near the following railway stations: Simla Crescent, Crofton Downs, Khandallah and Raroa.

- It is not realistic to allow multistorey building construction without car parking and comply with the NPS objective 3 that developments be near a centre, zone or other area with many employment opportunities
- **If the DPS is to be successful, central to its implementation must be the ethos that people can enjoy great lifestyles without cars.** For this to be achieved, people need easy walking access to amenities such as shopping centres, recreational activities, sporting facilities, doctors, hairdressers et cetera
- Areas such as Wellington city, Miramar, Kilbirnie, Newtown, Johnsonville and Tawa are well serviced and can readily accommodate such development.

- Most importantly, they are very walkable and people can enjoy great lifestyles without cars
- By comparison, the areas mentioned above are very poorly serviced. People would need to either walk long distances or be reliant on public transport to obtain access to such amenities.
- As a consequence, people would be more likely to own cars and fill the surrounding streets with car parking
- Further, people could become more isolated as friends and relatives with vehicles would find visiting difficult.

5. Parking Management Plan for Thatcher Crescent

Policy 11 of the NPS UD 2020 **strongly encourages** WCC to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.

- **The residents would be keen to understand how or if the council plans to meet its obligations under policy 11.**
- Thatcher Crescent has already been subject to considerable car parking disruption caused by a 22 unit townhouse development near the street entrance where parking requirements were ignored (despite strong representations from the residents at the time).

Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

The pace of change

Technological and social disruptions are occurring at a pace not seen in recent history. In particular, the emergence of two technologies are likely to change the way we live and work.

These include:

- The Zoom Effect. Working remotely is not new but Covid 19 has made it far more acceptable and people are reluctant to return. This will affect commercial offices and tertiary education
- The self-drive electric car revolution.

The advent of self-drive electric vehicles in addition to the Covid 19 effect is likely to change our requirements in ways we don't currently understand. On this basis, the safest course of action is to focus on the Central City and Hubs for the next 10 years or until this is better understood.

Introduction

While I appreciate the demands placed on the Wellington City Council by the NPS-UD 2020, for the reasons set out below, I believe you are within your rights to adopt a much more cautious approach.

Population projections overly optimistic

Firstly, the 80,000 figure is overly optimistic (47,000 is more realistic – please see below) and probably less in a post Covid world. Extreme estimates at the other end suggest growth could be less than 10,000. The truth is, due to the disruptions underway, we simply can't know.

Secondly, the proposed DPS amendments are a pre-Covid solution in a post Covid world.

Appendix B

The Housing Sufficiency table summarises how the Demand/Capacity numbers are derived.

Wellington City - Housing Sufficiency (shortfall/surplus) TOTAL 2017 - 2047 (30 Years)

| | Incr/Decr | Medium Forecast ID | High Growth Stats NZ |
|--|-----------|--------------------|----------------------|
| 4) Population Growth - Projections (Low Growth circa 20,000) | | 46,766 | 74,484 |
| 3) Housing Demand (New Build Demand) | | | |
| - Required Dwellings | | 21,339 | 32,337 |
| - Adj. Required Dwellings (+20% Short-term & 15% Long-term) | 3,590 | 24,929 | 32,337 |
| 2) Housing Development Capacity (Existing Capacity for New Build) | | | |
| - Plan Enabled Capacity | | 106,411 | 106,411 |
| - Adj. Economically Feasible to Develop (26%) | -78,457 | 27,954 | 27,954 |
| - Adj. Realisation Capacity | - 7,660 | 20,294 | 20,294 |
| 1) Shortfall (Demand less Capacity) - Over 30 Years | | 4,635 | 12,043 |
| 1a) Shortfall (Demand less Capacity) - Average Each Year | | 155 | 401 |
| | | | 260% |

NOTE: All Figures from : Housing and Business Development Capacity Assessment Wellington City Council Report 8 Nov'19

The underlying assumptions about growth are driving a process leading toward reduction in protection for inner city character areas in order to provide intensified development.

Key points to note:

- **The Required Dwellings** - are increased by 3,590 to "Please say that again" offer of over-supply" to 24,929 Dwellings.
- **The Housing Development Capacity** - starts at 106,411 & finishes at 20,294.

An economically feasible overlay is applied (at the point in time of the analysis) massively dropping the number to 27,954 dwellings. Then the realisable capacity is applied (recognising that only some will build within the 30-year duration) reducing the capacity by a further 7,660 to 20,294 dwellings

We are likely to live and work differently in future

The DSP assumes people will continue their daily commute into the central city to pursue their livelihoods. This is very likely a false premise. The trend away from that was already happening but Covid 19 has accelerated it. Going forward:

- Remote working will become the norm rather than the exception
 - companies will need less office space rather than more
 - workers will live further from the city (and increasingly in other towns and cities)
 - larger homes will be a consequence as workers will require a home office (maybe 2)

- there will be less need for students to come to Wellington as most will be able to pursue their studies online. Covid 19 has established the viability of this
 - Surplus University accommodation and lecture theatres will be available for apartments
 - Surplus office space will / is being converted to apartments
- An aging population (boomers) are either:
 - moving into high density retirement accommodation; or
 - vacating the city entirely for retirement homes in warmer climates
- the Labour government has expressed a desire that government agencies relocate away from the central city

The self-drive electric vehicle revolution

The DSP purports to be planning for the future but by 2050 most, if not all vehicles, will be electric (powered by renewable electricity) and predominantly self-drive. For those workers coming into town, its likely their vehicles will drop them at the local railway station and self-drive home to await their return.

Put simply, self-drive electric vehicles are a disruptive technology that are very likely to change the way we live and travel. There's endless speculation about how this will affect us but as yet, the future is still unknown.

Conclusions

- The DSP is a pre-Covid solution to a post Covid world. It's quite possibly obsolete already.
- The 80,000 estimate this proposal was based on is already a worst-case scenario (less than 40,000 is more realistic)
- Covid 19 has completely changed the landscape. This and the advent of self-drive electric vehicles is likely to change the way we live and work in ways we don't currently understand.
- It's reckless to allow six-storey plus apartment blocks in the suburbs when the need for them hasn't been confirmed.
- In the event it is confirmed, it should be staged as beginning with the central City and hubs (Miramar, Newtown, Kilbirnie, Johnsonville & Tawa that already have a wealth of local shopping and community facilities.
- The safest course of action is to focus on the Central City and Hubs for the next 10 years or until we have a better understanding of our future needs.

To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs.

The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? [View this section of Our City Tomorrow \(the Draft Spatial Plan\) here](#)

Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

- Strongly Agree
- Agree

- Neutral
- Disagree
- Strongly disagree
- Not sure

Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statements: [View this section of Our City Tomorrow \(the Draft Spatial Plan\) here](#)

The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula. This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park. This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center.

Do you support the idea of a community planning process for the following areas:

Te Motu Kairangi/Miramar Peninsula

- Yes
- No
- Not sure

Strathmore Park

- Yes
- No
- Not sure

If you answered yes, to the two questions above please respond to the following questions:

What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

What should the plan for regenerating Strathmore Park focus on or cover?

Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces? [View this section of Our City Tomorrow \(the Draft Spatial Plan\) here](#)

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree
- Not sure

Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

- Yes
- No
- Not sure

If you answered yes to the question above, what types of assistance would help landowners?

- Financial assistance
- Advice and guidance

- Planting
- Weed and pest control
 - Other – Please specify

Advice and guidance, planting and weed and pest control on a case-by-case basis. While we wouldn't rule out financial assistance, the bar would have to be set very high.

• Are there any final comments you wish to include in your submission? If so, please provide your comments below.

- Council is within its rights to push back against the strict requirements of the NPS UD 2020
- Council should act in good faith and in spirit with the NPS UD 2020 but at its own pace
- The DPS is a pre-Covid solution to a post Covid world. It's quite possibly obsolete already.
- The 80,000 estimate this proposal was based on is already a worst-case scenario (less than 40,000 is more realistic)
- Covid 19 has completely changed the landscape. This and the advent of self-drive electric vehicles is likely to change the way we live and work in ways we don't currently understand.
- It's reckless to allow six-storey plus apartment blocks in the suburbs when the need for them has yet to be confirmed.
- Any near-term development should be restricted to the central city and hubs (Miramar, Kilbirnie, Johnsonville, Tawa and Newtown) until we have a better understanding of our future needs.
- In the event more development is needed we recommend a staged approach be adopted. Areas with well-established community and shopping facilities as set out in our response to (*What would you change or improve?*) should be first considered.
- **In conclusion:**
 - **The DPS is a very blunt instrument to address the future population needs of our city**
 - **In its current form it risks causing much unnecessary disruption and unnecessarily changing the nature of many suburbs and areas.**
 - **Council needs to be much smarter about its implementation and adopt a staged approach consistent with the goals of the NPS**
 - **Minimum 6 story developments with no requirement for car parking SHOULD ONLY BE PERMITTED "where occupants can enjoy great lifestyles without cars"**

Attach document

Have you provided an attached document?

- Yes
- No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16184

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Organisation Name: Forest & Bird Youth

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

As young people, the green spaces and incorporation of nature into all aspects is absolutely key, for physical and mental health of communities. The vibrancy, liveliness, amenities and density of the inner suburbs is also an important attribute, meaning that people living in inner suburbs have access to variety and a range of different spaces in which to spend time. It is vital that we phase out the homogenous and car-dependency that many cities adhere to as this limits accessibility and inclusiveness to all. Character protection, whilst nice to have on some occasions, is excessive and limits positive development - urban character and inclusion of nature is far more

important. Development, if it includes green spaces, living walls, quality housing, connection to nature, should be encouraged and embraced if Wellington is to be a city that invites and protects people and planet. Walkability and cycling accessibility is another key aspect that must be incorporated into all urban designs - this includes storage, cycle and footpaths, and priority for non-motor vehicles - this will improve Wellington residents' physical and mental health as well as their satisfaction and enjoyment of the city.

For special character houses that remain unaffected by the new spatial plan, initiatives to retrofit them aimed at improving their energy efficiency for the health of people and the environment is critical to ensure these homes align with Te Atakura - WCC's Zero Carbon Strategy.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Access to cycleways/routes, Walkability within the centre

Other: Community gardens and composting hubs, use of natural infrastructure (e.g. for water treatment), wider footpaths, safe and separated cycleways, open waterways, ecosystem and biodiversity assets that can be interacted with.

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, New housing, Bicycle parking

Other: Connections to key cycle routes

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Local parks and natural areas, regional parks, cycle lanes, walking tracks, waterfront spaces, footpaths

What amenities or facilities were missing or could have been improved?

As a Youth Network, we are particularly concerned about the safety of young people in our city. More effective cycle lanes and footpaths to allow greater priority so that those walking and cycle for fitness, pleasure and mental health would need to have less concern about the danger of traffic whilst maintaining physical distancing - cars were travelling particularly faster than normal during lockdown due to lower traffic volumes so this was a significant concern.

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

As Forest & Bird Youth, we appreciate the emphasis on incorporating green space and improving accessibility. The plan is a big step in the right direction to incorporate nature into the heart of the city, particularly around walking and cycling, as well as making sure that nature is accessible everywhere. It will also help to reduce excessively high housing and transport costs for individuals, as well as reducing car-dependency and low-amenity living. Removal of minimum parking requirements is a huge step that will greatly improve Wellington's liveability as long as public transport is supported to allow heavier demands. Higher density urban development will allow better quality housing at lower cost, while at the same time providing access and ease of use to a range of amenities. These designs need to include and prioritise nature and access to nature to ensure physical and mental health in urban spaces is not neglected. This will enable further and ongoing benefits long-term and will have a huge impact on the liveability of the Wellington region.

- 2.
3. **What would you change or improve?**
The plan should take more drastic measures to ensure nature is incorporated in urban design/infrastructure - this is absolutely critical in the protection of our ecosystems, human health around air pollution and heat control, mental health and peace of mind, as well as sustainable city design to future proof our spaces and ensure that our impact on the planet is minimised, or net positive. Character protections are currently excessive, and need to be minimised as they severely limit the positive impacts of high density developments, particularly in the inner city areas where they are most impacting.
- 4.
5. The plan must ensure it aligns with Te Atakura and assesses every decision/impact with a climate lens, so that the spatial plan provides us with the incentives to reach net zero carbon emissions.
- 6.
7. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**
The youth of today are the ones who will be facing the housing and climate crises in the next 30 years. This means that young people need to be consulted and their opinions respected when it comes to designing new developments and altering the way our city will look in the future. Wellington needs to be designed with their concerns in mind, which includes maintaining biodiversity, mitigating and adapting infrastructure to environmental concerns, affordable and sustainable housing, amongst other issues. As Forest & Bird Youth, we represent the hopes and fears of young people in the climate space, and we want to ensure that their voice is repres
- 8.
9. Sustainable transport systems are the key to effective urban design - public transport needs to be prioritised, and to be the most convenient and logical choice so as to promote behaviour change within our community. This will reduce congestion, allow for streets to be fully pedestrianised in the city, and make way for bike and e-scooter lanes for easy accessibility for everyone. This will reduce overall delays and ensure that it is clear that public space is for the public good rather than that of individuals. Reducing the allowance of space for driving and parking private cars will create more space for urban green areas with micro-parks and nature areas throughout the city becoming a possibility. Nature should be something that surrounds us all the time and that we can feel constantly connected to, rather than something we need to travel far away to find.
- 10.
11. It also seems key that there is a focus on ensuring new developments are not only incorporated into urban designs, but are designed to be climate friendly. This should include use of sustainable building materials as well as energy efficient strategies throughout any and all new developments. This is a key part of creating a sustainable community in New Zealand, and minimising Wellington's impact on climate change.
- 12.
13. **To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:**
- 4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.**
Strongly Disagree
- 4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.**
Strongly Agree
- 4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.**
Strongly Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Disagree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Strongly Disagree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Strongly disagree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Strongly Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

No

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

It would be unreasonable to have a separate planning process for these areas as this will over-complicate any potential developments. These are high amenity accessible parts of Wellington that should be free to develop into urban centres over time rather than annexed and protected for no reason.

8.2 What should the plan for regenerating Strathmore Park focus on or cover?**9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?**

Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Forest & Bird Youth is an organisation run by 14-25 year olds around New Zealand. This submission was made on behalf of Forest & Bird Youth Wellington in consultation with Forest & Bird - however this represents the Wellington Youth hub's views and should be taken as an indication of what our team believes and not Forest & Bird as a whole.

It is imperative that the Draft Spatial Plan be integrated with Te Atakura and Our Natural Capital - Wellington's Biodiversity Strategy. Habitat loss and pollution are two of the leading drivers of biodiversity loss in New Zealand, and development requires the use of fossil fuels (through machinery, creating materials, or otherwise). Therefore, measures not only need to be taken to reduce these impacts - but the outcomes of the plan must ensure that less of these damaging activities occur in the future. That means compact cities, active and public transport, and restoring a network of green spaces and community gardens throughout our city.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 14111

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Emma Osborne

Suburb: Vogeltown

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

What's important to me is my friends who live in these areas not needing to move to the Hutt because housing in Berhampore is too expensive. That's not the built character of the area but it is what makes it home to my family. I strongly support removing most of the heritage protections and allowing for densification if this allows for more affordable housing. I'd go further than the council has and not have building height limits in the special character areas. I think these can exist alongside higher buildings.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Social services and community facilities, Access to cycleways/routes, Walkability within the centre

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Parks and playgrounds, New housing, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Level 3 and 4: open sports fields cos the playgrounds were shut. Walking tracks in the town belt. The enormous number of library books I got out before lockdown. Libby the library app. Although the libraries were physically shut, the resources were still awesome. Bike parking.

Level 2: the playgrounds! Bike lanes more important as road traffic picked up again.

What amenities or facilities were missing or could have been improved?

Bike lanes still important as we moved out of lockdown, and actually more so as traffic increased. Was disappointed to see the pop up bike lanes not implemented.

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

Density done well! Prioritising more density around city and major transport corridors. The plan is bold and clearly moves away from greenfield development towards greater urbanism.

2.

3.

4. What would you change or improve?

Greater emphasis specifically on social and affordable housing. I would love to see more council housing in our suburb and neighborhood.

- 5.
6. Greater emphasis on getting to carbon zero through making active and public transport easier and with disincentives for driving a car, with the exception of mobility users. For example, I would love to see low traffic, filtered neighborhoods that allow bikes and foot traffic through while stopping through traffic from cars. Makes it safer to ride around and walk. Also would like to see the 30kph speed limit extended as part of densifying the city. Charge a fair market rate for on street parking and proactively reallocate space away from parking.
- 7.
8. The 'greener' in the plan has a lot on preserving or improving our green spaces especially with regards to making the city enjoyable. This is great but won't get us to carbon zero. We need to look at the role of cars in the city to do this.
9. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**

10. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Neutral

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Neutral

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Agree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Disagree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Neutral

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 15917

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: diana munster

Suburb: Paparangi

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Neutral

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Agree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Agree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Agree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

Although I generally agree with the proposals above I do not support minimum building heights, I believe there should be some flexibility to go below these heights depending on site specific issues

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Agree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

vibrancy

architecture

green spaces

walkability

community space (seats in parks, libraries etc)

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Commercial activity (retail, cafes, local businesses), Access to cycleways/routes

Other: I believe all the above are important - while infra-structure in its self isnt vibrant good quality infrastructure with capacity for population growth is critical

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Parks and playgrounds, Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Medical facilities/centres

Other: I believe all are desirable around mass transit hubs

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Agree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

-the tracks through surrounding parks and reserves which I used for walking and mountain biking (Skyline walkway/cycleway); walking paths off Woodridge and Grenada (to Horokiwi Road),

-during level 4 lockdown there were fewer cars travelling on the road on the road, and as many houses made use of off street parking there weren't many parked on the roadside, so I was able to able to maintain social distancing when out walking by walking on the road. I noticed many others doing the same, and indeed there seemed to be more of a community feel

- I felt safer cycling on the local roads during level 4 lockdown due to lower traffic volumes

What amenities or facilities were missing or could have been improved?

I was concerned that those living in multi story apartments during level 4 did not have the same opportunity as I did to get out and were confined to their own apartment

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

I like the fact that we are planning for our future and agree some densification of housing and development in general is needed

2. What would you change or improve?

- 1) I would like to see how Wellington City's spatial plan fits in with the city's and towns that make up Greater Wellington in particular Porirua City and Hutt City
3. 2) I would like to see review stages in rolling out the spatial plan so we can respond to unexpected events or aspects of the plan that do not work (e.g. transport mode, earthquake even, covid 20)
4. 3) I would like to see some safeguard to ensure new developments do not become the ghettos or leaky homes of the future and that
5. -Wellington remains the coolest little capital
6. -the suburban areas retain their character
7. the city remains walkable and indeed increases in walkability through paths and walkways and having future roads with capacity/road reserve width for all road users
8. 4) I do have concerns that doing away with the requirement for on site parking will result in increased use of roadside space for parking thus making roads less pleasant for cycling I would like to see provision for off street car parking maintained at some level as I dont see car ownership will suddenly be eliminated
9. 5) I see developing a sense of community and spaces for community gardens, recreation as critical and given our weather is fickle some thought given to shelter or indoor space
- 10.
11. 6) I have reservations about developing in Ohariu Valley as to me it would change the rural character of the valley.
- 12.
- 13.

14. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

sorry cant think of anything just now

15. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Agree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects

local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Agree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Agree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Disagree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

I would like to see the recreational character retained

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Agree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other: I believe all are desirable around mass transit hubs

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

I would like to see more greenspace and reserves- especially for recreational walking /cycling
- e.g from Woodridge to Horokiwi

Accessibility of housing and community is really important given our aging population

Have you provided an attachment?

CF Finlayson**Submission for the “Our City Tomorrow: A Draft Spatial Plan for Wellington City”**

1. My name is Christopher Finlayson and I live in [REDACTED] Khandallah, Wellington. I am making this submission on the Draft Spatial Plan for Wellington City. I also seek to make an oral submission.
2. I have read the submission by the Onslow Residents’ Community Association. I think it is an excellent submission and agree with everything in it. I will not repeat those points here.
3. I seek to make the following additional submissions:
 - a. This is a proposal for Wellington City but I believe any submission relating to housing in Wellington must necessarily have regard to the circumstances of other cities in our region. When one looks at the Wellington region as a whole and the projected population trends for the next 50 years, I think it is clear that there is more than enough land for housing development without Wellington City having to consider some of the extreme measures proposed in this plan. For example, Wainuiomata was developed over half a century ago and it was always anticipated it would have more than 50,000 residents. My understanding is that there is a lot of land in Wainuiomata North which could be developed and there is also talk of a link road between Wainuiomata and Stokes Valley to provide Wainuiomata with a second exit. Wellington City should not be myopic and focused solely on proposals for this area: it must consider the wider region.
 - b. The proposal has a very twentieth century feel to it. It presumes that twentieth century ways of working are going to continue. As we know, however, the current pandemic has already caused a radical shift in working habits. Working from home, as opposed to commuting, is going to become increasingly common. Wellington City is going to have to think long and hard about the future of the inner city area. In the case of Wellington, these changes have been coming for some time. When I first started practicing law in 1980, I worked in a firm called Brandons on The Terrace. At that time, The Terrace was one of the commercial hubs of New Zealand. Companies like BOC Gasses, Shell, the Dairy Board and many others were housed along The Terrace. Many of these companies left Wellington in the late 1980s and, if one walks along The Terrace these days, one sees a huge increase in apartments and student accommodation. In my opinion, inner city Wellington will continue with this trend. I suspect there will be an increasing number of people living in the very centre of town and that there will be more than enough space to satisfy the requirements of the city. I commend to councillors an excellent report on the future of the office contained in *The Economist* of 12 September 2020, which addresses some of these issues.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID 16044

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Clara Breitenmoser

Suburb: Newtown

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Neutral

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

I am pro high density housing, but I do not believe that this plan is the best way to achieve this. Allowing the random location of taller buildings among 1-2 storey character will drive people away from these areas and will not automatically lead to more affordable and accessible housing.

I believe that concentrated areas of high rise development should occur in the suburban centres and areas where semi-industrial and commercial land is underutilized.

I support the Newtown Residents' Associations proposal which would enable 2000+ more homes, more than the area is currently projected for.

Intensified housing should occur in the Newtown Suburban Centre with up to 6 storey apartments behind historic shopfronts, and along the key transport spine. Kent and Cambridge Terrace, and Adelaide to John Street should be zoned for 6 storey multi-dwellings as they are currently underutilised. Along the bus routes and that much closer to the CBD would reduce car dependencies.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

I grew up in Newtown and I love the mix of houses, the closely packed timber houses close to the street and the community it fosters.

New buildings must take into the account of the current streetscape. Randomly located apartment blocks on quiet residential streets will lead to darker and damper existing homes. These timber homes should be valued and lived in for many years to come.

I do not believe the diversity of incomes, ages and cultures, and the special character of the wider suburb has been represented in the proposed character area.

There are much greater areas recognised by Boffa Miskell as having consistent pre 1930s character value. The proposed character area mostly encapsulates areas where wealthy merchants built homes, rather than the more prevalent workers' cottages which are very important to Newtown's character, in the past and in the present.

More people and intensified housing in the suburb's commercial centre and along key transport spines would contribute to this character of this beloved suburb. Applying a blanket approach to rezoning and allowing demolishing/building without requiring resource consent would pose a serious risk to the suburb.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Public/shared spaces, Commercial activity (retail,cafes, local businesses), Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Social services and community facilities

Other: Concentrated density housing right in the Newtown and other suburban centres, where it is already zoned for tall buildings and can be clustered around the suburb's key amenities.

8. What amenities would you want to see around future mass rapid transit stops?

Shops and businesses, Cafes and restaurants, New housing, Community facilities (libraries, community spaces, social services, etc.)

Other: I would love to see housing clustered around suburban commercial centres and then transit stops in these areas too. This creates buzzing communities and safe centres.

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Local dairy and pharmacy, community support groups, public spaces for walking/exercise.

What amenities or facilities were missing or could have been improved?

N/a

Non-Compulsory Questions**1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?**

I agree that:

2. — Wellington City is already experiencing a housing crisis and we don't presently have enough warm and affordable housing
3. — we need to create well-functioning, high density urban environments to support the expected growth in populat

4. What would you change or improve?

I oppose the Spatial Plan proposal allowing 6+storey buildings in large areas of Newtown's residential streets, oppose 6 and 4 storey buildings across most of the balance of Newtown and Berhampore, also oppose 3 storeys amongst the token residential heritage pockets that Council proposes be protected.

- 5.
6. Resource consent should be required to demolish any pre-1930 dwellings in the inner suburbs. The pre-1930 character demolition controls in areas outside of identified character sub areas should not be removed.
- 7.
8. The draft spatial plan should propose increased density by reworking the aspects and areas of Newtown, and other inner suburbs that are in need of improvement.
- 9.
10. The current draft plan does not recognise that the council should be the kaitiaki (guardians) of its current citizens wellbeing as well as future residents.
- 11.
12. The draft spatial plan should recognise the vibrancy of the inner suburbs and the rich fabric that Wellington is made up of, not imposing a blanket. Heritage and character protection is not only relevant in intact and consistent areas. Wellington's unique heritage and character is a result of a mix of styles and time periods.
- 13.
14. The NPS-UD should not be used as a justification for high rise in Newtown's residential area. This is a misrepresentation of requirements. Newtown does not fit the definition of having an existing or planned mass

rapid transit route, just a notion and no route or specific stops have been decided. If it is built in the future it will not fit the definition in the NPS-UD which includes that itâ€™s on a route primarily without other vehicles.

15.

16. Do not leave town planning to the decision of profit-motivated developers.

17.

18. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

Engage with community to find best solutions for increased housing density, do not dictate a blanket solution that has no regard for good urban design, no consideration of the typography or understanding of the community.

19.

20. I urge the council to consider the negative environmental impacts of the proposed plan.

21.

22. - Newtownâ€™s 1 and 2 storey timber dwellings are resilient and have survived 100+ years of earthquakes, storms and pandemics while many new 6+ storey buildings in Wellington have had a lot of damage in earthquakes.

23. - It is hugely expensive to insure high rise dwellings compared to 1 and 2 storey houses and body corp fees to maintain and repair them has proved astronomical.

24. - The existing old houses built of native timbers represent a great deal of embodied energy and sequestered carbon. Many have been adapted and upgraded over time, which is more environmentally sustainable than replacing them.

25. - Demolition and new building, particularly high rise, is very carbon intensive. This is in direct opposition with the WCCâ€™s Te Atakura â€œ First to Zero policy on sustainability.

26. - Tall buildings amongst existing 1 and 2 storey neighbours will create environmental problems including shading homes and gardens, and causing wind tunnels and downdraughts. Shade will make neighbouring houses damp and cold, reducing the quality of living and affect health in these neighbouring flats and homes.

27.

28. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects

local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Agree

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

WCC should work with the communities of these areas to best meet the needs of the community and work out the best way to incorporate high density into the local and natural environment.

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

WCC should work with the communities of these areas to best meet the needs of the community and work out the best way to incorporate high density into the local and natural environment.

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Strongly Disagree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Advice and guidance

Other: I would love to see housing clustered around suburban commercial centres and then transit stops in these areas too. This creates buzzing communities and safe centres.

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

I really love this city. I believe that with clever, responsible and thoughtful town planning which has a focus on intensifying housing along key transport routes and underutilized semi-industrial areas, we can make it a beloved, thriving and functioning urban environment which supports and provides for current and future residents, families, local communities, businesses and the environment. I really hope the WCC sees that the current plan is not the right path to get there.

I would be willing to make an oral submission if the opportunity is available.

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Absolutely Positively
Wellington City Council
Me Heke Ki Poneke



We want to hear your views on Our City Tomorrow (the Draft Spatial Plan).

Tell us what you think by answering these questions below

You can post this form to us (no stamp needed) or email this form to: planningforgrowth@wcc.govt.nz

You can also answer these questions online at:
planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form

Make a submission by **Monday 5 October 2020 at 5pm.**

Privacy statement - what we do with your personal information

View our full privacy statement online: planningforgrowth.wellington.govt.nz/privacy-statement

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the Resource Management Act.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

View Our City Tomorrow (the Draft Spatial Plan) online

planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan

Mobile and accessible version planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Our City Tomorrow: A Draft Spatial Plan for Wellington City (mobile and accessible version)

Downloadable PDF planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Summary of Our City Tomorrow: A Draft Spatial Plan for Wellington City (PDF)

Section 1 - your details *mandatory field

| | |
|---|---|
| Your name (first and last)*: | CRAIG PALMER |
| Your email*: | |
| Postal address*: | [REDACTED] |
| Suburb: | MOUNT VICTORIA |
| Phone number: | [REDACTED] |
| Age range: | [REDACTED] |
| Household: | [REDACTED] |
| Preferred method of contact: | <input type="checkbox"/> Email <input checked="" type="checkbox"/> Post |
| <input type="checkbox"/> You would like to sign up to our email newsletter and receive news and updates regarding Planning for Growth | |
| You are making this submission: | |
| <input checked="" type="checkbox"/> as an individual | |
| <input type="checkbox"/> on behalf of an organisation. Your organisation's name: _____ | |

Section 2 - compulsory questions

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure | | | | | | | | | | | | | | |
|---|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|---|--|---|--|--|---|--|---|---|---|--|--|--|---|
| 1. To what extent do you agree or disagree with what is proposed with intensification in the central city?*(Refer to Central City fact sheet number 02) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | |
| 2. To what extent do you agree or disagree with what is proposed with intensification in the inner suburbs?*(Refer to Inner Suburbs fact sheet number 03) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | |
| 3. To what extent do you agree or disagree with what is proposed with intensification in the outer suburbs?*(Refer to Outer Suburbs fact sheet number 04) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | |
| 4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs, and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?* | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | |
| a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?* | Phased development of a special plan addressing changing preferences | | | | | | | | | | | | | | | | | | | |
| 5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?*(Refer to Character Areas fact sheet number 05) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | |
| 6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about character in these suburbs is important to you?*(Refer to Character Areas fact sheet number 05) | Existing height limits of one and two storeys need to be retained. New development needs to be horizontal (not vertical). | | | | | | | | | | | | | | | | | | | |
| 7. What amenities would you want to help create a vibrant suburban centre?*(Please pick your top 5 from the options below.) | <table border="0"> <tr> <td><input checked="" type="checkbox"/> Proximity to parks and open space</td> <td><input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Access to public transport</td> <td><input checked="" type="checkbox"/> Social services and community facilities</td> </tr> <tr> <td><input type="checkbox"/> Public/shared spaces</td> <td><input type="checkbox"/> Medical facilities/centres</td> </tr> <tr> <td><input type="checkbox"/> Commercial activity (retail, cafes, local businesses)</td> <td><input type="checkbox"/> Access to cycleways/routes</td> </tr> <tr> <td><input type="checkbox"/> Employment opportunities</td> <td><input checked="" type="checkbox"/> Walkability within the centre</td> </tr> <tr> <td><input checked="" type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc)</td> <td><input type="checkbox"/> Easy walking distance to the centre</td> </tr> <tr> <td></td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table> | | | | | | <input checked="" type="checkbox"/> Proximity to parks and open space | <input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) | <input checked="" type="checkbox"/> Access to public transport | <input checked="" type="checkbox"/> Social services and community facilities | <input type="checkbox"/> Public/shared spaces | <input type="checkbox"/> Medical facilities/centres | <input type="checkbox"/> Commercial activity (retail, cafes, local businesses) | <input type="checkbox"/> Access to cycleways/routes | <input type="checkbox"/> Employment opportunities | <input checked="" type="checkbox"/> Walkability within the centre | <input checked="" type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Easy walking distance to the centre | | <input type="checkbox"/> Other (please specify) |
| <input checked="" type="checkbox"/> Proximity to parks and open space | <input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Access to public transport | <input checked="" type="checkbox"/> Social services and community facilities | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Public/shared spaces | <input type="checkbox"/> Medical facilities/centres | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Commercial activity (retail, cafes, local businesses) | <input type="checkbox"/> Access to cycleways/routes | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Employment opportunities | <input checked="" type="checkbox"/> Walkability within the centre | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Easy walking distance to the centre | | | | | | | | | | | | | | | | | | | |
| | <input type="checkbox"/> Other (please specify) | | | | | | | | | | | | | | | | | | | |
| 8. What amenities would you want to see around future mass rapid transit stops?*(Please pick your top 5 from the options below.) | <table border="0"> <tr> <td><input checked="" type="checkbox"/> Public shared spaces</td> <td><input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Landscaped spaces/plantings</td> <td><input type="checkbox"/> Child care</td> </tr> <tr> <td><input type="checkbox"/> Parks and playgrounds</td> <td><input type="checkbox"/> Medical facilities/centres</td> </tr> <tr> <td><input checked="" type="checkbox"/> Shops and businesses</td> <td><input type="checkbox"/> Bicycle parking</td> </tr> <tr> <td><input type="checkbox"/> Cafes and restaurants</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> <tr> <td><input checked="" type="checkbox"/> New housing</td> <td></td> </tr> </table> | | | | | | <input checked="" type="checkbox"/> Public shared spaces | <input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) | <input checked="" type="checkbox"/> Landscaped spaces/plantings | <input type="checkbox"/> Child care | <input type="checkbox"/> Parks and playgrounds | <input type="checkbox"/> Medical facilities/centres | <input checked="" type="checkbox"/> Shops and businesses | <input type="checkbox"/> Bicycle parking | <input type="checkbox"/> Cafes and restaurants | <input type="checkbox"/> Other (please specify) | <input checked="" type="checkbox"/> New housing | | | |
| <input checked="" type="checkbox"/> Public shared spaces | <input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Landscaped spaces/plantings | <input type="checkbox"/> Child care | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Parks and playgrounds | <input type="checkbox"/> Medical facilities/centres | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Shops and businesses | <input type="checkbox"/> Bicycle parking | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> Cafes and restaurants | <input type="checkbox"/> Other (please specify) | | | | | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> New housing | | | | | | | | | | | | | | | | | | | | |

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through retention of a general character area to ensure that new development respects the local streetscape and is well-designed. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations where streetscape character is substantially intact. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? <i>View this section of Our City Tomorrow (the Draft Spatial Plan): planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites</i> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, greener city. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement? <i>View this section of Our City Tomorrow (the Draft Spatial Plan): planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites</i> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. We also want to understand the public appetite for community planning processes in specific areas, such as: Te Motu Kairangi/Miramar Peninsula This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route. Strathmore Park This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center. | | | | | | |
| 8. Do you support with the idea of a community planning process for the following areas? | | | | | | |
| 8.1.1 Te Motu Kairangi/Miramar Peninsula | | | | | | |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure | | | | | | |
| 8.1.2 Strathmore Park | | | | | | |
| <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure | | | | | | |

9. If you answered yes, to the two questions above please respond to the following questions:

9.1.1 What should the **Te Motu Kairangi/Miramar Peninsula Framework** focus on or cover?

Creation of a national park protected and funded by central government.

9.1.2 What should the **plan for regenerating Strathmore Park** focus on or cover?

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <p>10. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?</p> <p>View this section of Our City Tomorrow (the Draft Spatial Plan):</p> <p>planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Natural & Open Space</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

11. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes No Not sure

12. If you answered yes, to the question above what types of assistance would help landowners?

Financial assistance Planting Other (please specify) _____
 Advice and guidance Weed and pest control _____

13. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

See attachment

14. Have you provided an attached document?

Yes No

21 September 2020

DRAFT SPATIAL PLAN
INDIVIDUAL SUBMISSION FROM CRAIG PALMER

Staged Implementation

1. At the outset the spatial plan could be confined to brown field spaces in the inner city such as Thorndon Quay and Adelaide Road.
2. Further development of the spatial plan could be held in abeyance until mass transit public transport routes are bedded down.

Social and Low Cost Housing

3. Central and local government need to purchase inner-city sites to create low to medium density social and basic owner-occupier housing. Failure to address this need will intensify inter-generational conflict.

Retain Low Rise Pattern in Inner-City Neighbourhoods

4. The inner-city neighbourhoods largely create Wellington's unique appearance. They constitute a heritage asset as well as being of vital cultural and economic importance.
5. New development needs to be horizontal rather than vertical. This by way of subdivided titles in existing large houses and small minimalist houses along rear boundaries.
6. For generations, horizontal development has been the traditional way of increasing population density in Wellington's inner-city communities.
7. Horizontal development combined with publicly funded social and low cost housing is the most realistic way of meeting the housing aspirations of younger generations.
8. By contrast, high rise in the inner city will cater only to the already well-off. The capital cost of the land is so high that apartments will have to be offered at high prices for private developers to make a profit.

Spreading of Seismic and Sea Level Risk

9. As it is presently crafted, the spatial plan relies too heavily on high rise housing in seismically vulnerable areas.
10. More evenly spread low to medium height limits would spread the risk. Insurance cover may not be available for high rise apartments above potential liquefaction and flood prone sub-strata.

11. Contracted insurance cover needs to be a pre-condition of any proposed high rise development.

Proposed Hania Street Height Limits

12. The 8 storeys along both sides appears to be an unintended aberration. The eastern side of Hania Street needs to be kept at no more than 3 storeys.

13. Character sub-areas such as Moir Street need to be bordered by buildings that are kept sufficiently low as to avoid serious degradation of heritage.

14. Loss of sunlight and air circulation can do irreparable damage to heritage wooden buildings. Moreover, shade induced mould and damp can gravely impair people's health.

Retention of Demolition Rule and Need for Design Guidelines

15. Quality new development needs to be underpinned by demolition being evaluated on a case-by-case basis.

16. New development in the inner-city neighbourhoods needs to conform to finely crafted design guidelines.

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID **15349**

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: john Bryce

Suburb: Aro Valley

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

the atmosphere is important but needs to be blended to facilitate high-quality dwellings and not simply repeat the failures of past design

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Access to public transport, Public/shared spaces, Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Easy walking distance to the centre

Other: protect sunny spaces

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Shops and businesses, Cafes and restaurants, Bicycle parking

Other: shelter from the environment

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Strongly Disagree

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

open space with sunshine

What amenities or facilities were missing or could have been improved?

sheltered areas

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

2. What would you change or improve?

consideration of what is a high-quality dwelling.

3. this should include the value of other people's sunny spaces.

4.

5. Aro valley park should not be in the shade of the proposed development.

6. the plan should show/ display the areas shaded by the intended future development. both at mid-winter and mid-summer.

7.

8. Holloway rd should not be limited to free-standing one and two-storey dwellings.

9. the topography lends itself to terraced multi-level buildings tiered up the hill above garaging and entry.

10. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

see previous

11. I would like to make an oral submission

12. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Neutral

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Neutral

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Agree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Neutral

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area,

investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Not sure

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Disagree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

11. If you answered yes to the question above, what types of assistance would help landowners?

Financial assistance

Other: shelter from the environment

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

I would like to make an oral submission

Have you provided an attachment? No

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15641](#)

Privacy statement – what we do with your personal information

View our full privacy statement online: <https://planningforgrowth.wellington.govt.nz/privacy-statement>

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the [Resource Management Act](#).

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

Submitter Name: Kirsty Wood

Suburb: Mount Victoria

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Strongly Disagree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Strongly Disagree

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Strongly Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

Through all the run down industrial areas of which there heaps. For example Kent and Cambridge Tce Adelaide road. Examine these options and copy the Copenhagen high rise models for density housing.

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

These suburbs with their 100 old years of houses add the special character of Wellington.

The box like wooden houses are seen when you walk or drive round these suburbs. Where I live the number of tourists walking to the Monastery is huge. We cannot lose our heritage. Wellington is admired because of the quaintness of its buildings not high-rise. Its easy to destroy something never to be replaced.

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Medical facilities/centres

Other:

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Landscaped spaces/plantings, Cafes and restaurants, Child care, Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Neutral

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Good footpaths and lighting.

Plummer park and the mt victoria walks

What amenities or facilities were missing or could have been improved?

Nothing

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

Its a start for conversation

2. What would you change or improve?

Remove all high-rise development in our suburbs with old housing in good order .

3. Think about the buildings to be removed because unsafe.

4. Look at Wellington's industrial areas Many are very old need replacing use this land.

5. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

More thought for my beautiful city.

6. The hills and these old homes are photographed by so many. They need respect by the planners

7. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Neutral

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula**7.2 Strathmore Park**

Yes

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

??? N/A

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

N/A

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Strongly Disagree

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

No

11. If you answered yes to the question above, what types of assistance would help landowners?

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

No

Have you provided an attachment? No

Spatial Plan submission

Submitters:

Brown/Jordan whanau

[REDACTED]

Mt Victoria

Contacts:

Email [REDACTED]

Phone [REDACTED]

Email [REDACTED]

Phone [REDACTED]

Areas covered in submission

In the main our submission relates to the inner city and character sub-area parts of the Draft Spatial Plan that relate to Mount Victoria. We have identified six significant areas of concern regarding the Draft Spatial Plan that we want to cover in this submission. These are:

1. Do not repeat the mistakes of the past
2. The plan as currently drafted will destroy Mt Victoria heritage and character
3. The statistical analysis is erroneous, unrealistic and out-of-date
4. The plan does not address the impact on infrastructure
5. The consultation and submission process has been hasty and unfair
6. There is a better way forward, and other options need to be considered and consulted upon.
7. We have also attached an appendix noting that Council actions appear to be at odds with Spatial Plan

1. Do not repeat the mistakes of the past

The Brown/Jordan whanau are long term Mt Vic residents:

- We met in Mt Victoria and got married in Mt Victoria have lived in Mt Victoria for over 40 years
- Our three children (Julia, Claire and Chris) attended Crossways Creche, Clyde Quay Kindergarten and School, Wellington East and Wellington College
- Our house has been the base for Brown/Jordan family whanau family events over 40 years
- We have a wonderful community of neighbours and friends who live within Mt Victoria and who meet fairly regularly in each other's homes.

We arrived in Mt Victoria soon after Melksham Towers was erected. At that time many Mt Victoria residents were scared that the developers, with Council blessing, were about to unleash the bull dozers on Mt Victoria to replace heritage buildings with 10 storeys tower block monstrosities.

Luckily at that time residents rose up in protest against this dystopian future for Mt Victoria. Even if it was too late to stop the construction of the Melksham Towers, it was successful in building a closer community within Mt Victoria.

In the 45 years since Melksham Towers was erected, the pre 1930s protection arrangements have generally worked well to preserve the special heritage and character of Mt Victoria. They have not prevented sympathetic renovation and redevelopment occurring. They have provided a level of certainty for families that has allowed people to upgrade and maintain their homes. In this respect they have also contributed toward a more stable community. There are now more families in Mt Victoria with the overwhelming majority of kids at Clyde Quay School coming from homes in the suburb.

The problem with the Draft Spatial Plan is that we see history about to repeat itself. Area planning appears to have once again become the prerogative of a group of experts 'who know best'. The Spatial Plan seeks to disenfranchise Mt Victoria residents and transfer power to developers to demolish and build multi-storey apartment walls across the suburb.

We have already witnessed the Draft Spatial Plan creating uncertainty and anxiety for many Mt Victoria residents (both home owners and renters). Some people promoting the Draft Spatial Plan have branded us NIMBYs. This is cheap and unfair. We are ordinary people who have a deep and abiding commitments to the place where we live. Because of our commitments we are likely to be better guardians of Mt Victoria than fly-by-night developers. We are not opposed to dense living. We have all chosen to live in one of New Zealand's densest suburbs. We are also not opposed to sympathetic renovation and redevelopment. But Mt Victoria residents must have a say in what is right for their suburb. They must not be forced to bear the adverse consequences of developments on their homes without having some

say in the process. The alternative will inevitably see Mt Victoria residents fighting the Council in the Courts and in front of bull dozers. Such an outcome is not good for anyone.

2. The plan will destroy Mt Victoria heritage and character

In the draft plan the Council has asked if submitters think this approach offers a good balance between protecting special character and providing new housing. This includes changes to the pre-1930 character areas and the introduction of character sub-areas.

The historic housing stock of Mt Victoria and its unique form are used to promote Wellington, not least by Wellington City Council. The suburb is visited and appreciated by New Zealanders and international tourists.

The pre-1930s protections were put in place in the 1980s because of concerns that unrestrained and poor quality development in Mt Victoria could undermine a significant part of the architectural and social heritage of Wellington city.

Removal of the pre-1930s restricted demolition rule, as proposed by the draft spatial plan, and allowing the building of multi-storey apartments across 62% of Mt Victoria will quickly lead to the loss of an essential part of Wellington's identity and undermine heritage and amenity values of much of the remaining 38% of the suburb. Once these historical buildings are lost, they cannot be replaced.

The proposed character sub-areas create a bizarre jigsaw which will significantly retract from the overall character of the area. They are highly arbitrary and do not achieve the stated aim of protecting the character of Mount Victoria. Many of the proposed character sub areas will be over shadowed and lose sun and views by walls of multi-storey apartments with full-site coverage that will abut protected sub areas. It will also potentially decrease the level of community engagement and spirit in some of Wellington's most diverse suburb.

The draft spatial plan will allow construction of multi storey apartments to occur as-of-right across 62% of Mt Victoria. There will be no requirement for a developer to seek resource consent, and no opportunity for adversely affected residents to have their concerns heard. Residents who have lived many years in the suburb and who care about its unique environment will effectively be disenfranchised. The wider public will also be impacted by the removal and erosion of Mt Victoria's character and history will be lost to future generations.

3. The statistical analysis is erroneous, unrealistic and out-of-date

The proposals in the plan do not seem to clearly correlate to the statistics and rationale contained within the plan. This makes it very difficult to understand and provide feedback on the modelling that was undertaken to inform the design of the

plan. In order to provide more informed decisions, the public need access to more of the evidence base that was used to inform the plan and the key assumptions that were made. Carrying forward with the plan in the absence of providing evidence that can be subject to appropriate scrutiny and validation is irresponsible and undemocratic. It is not consistent with the legislation.

Taking the Statistics NZ medium population growth figure, equating that to Housing Demand and deducting the Housing Capacity, there would appear to be a shortfall of 4,635 dwellings over 30 years or just 153 dwellings per year city wide.

WCC has not shown that there is a material shortfall in housing capacity over the next 30 years (under the current rules) that is sufficient to justify removing the pre-1930s non-demolition rule to provide for intensified development.

Our conclusion is that the amount of housing required is consequently unrealistically inflated. It has been designed to meet the highest possible growth in population, which is not feasible. Almost all the additional housing required could be built under existing rules. It is a 30-year Plan but requires development in heritage areas from Day One, which may never be needed.

We are also conscious that work on the Spatial Plan occurred before the impact of Covid19. It appears that the post Covid19 world will see more people working from home with less demand for central city work places and central city accommodation.

WCC should engage an independent expert to review the key assumptions and rationale used in the plan. Consultation with key stakeholders must form part of a robust review.

4. The plan does not address impact on infrastructure

The plan would allow developers to significantly increase the density of the population living in Mt Victoria. However, the draft plan provides no information concerning the infrastructural impacts, and how those adverse impacts will be addressed and mitigated satisfactorily.

As one of the most densely populated suburbs in NZ and with some very old infrastructure given the age of the suburb, it is vital that the plan address the risk of infrastructure failure and upgrade expenditure be included as part of the spatial plan consultation.

Mt Victoria residents need more information regarding infrastructural impacts in order to make well informed submissions on the plan. How will the underlying 3 waters infrastructure support additional dwellings? What investment would be required for various population growth scenarios? Will it be paid for by the developers or will the cost fall on Mt Victoria and Wellington rate payers?

5. The consultation and submission process has been hasty and unfair

Residents are concerned about the process of developing and consulting on the Draft Spatial Plan.

We were initially told that the need for the Draft Spatial Plan was a requirement of the National Policy Statement on Urban Development. Now, however, this appears not to be the case. Citizens need to know clearly where the pressure for the plan is coming from.

The plan appears to have been rushed or sloppy, to the extent that different versions have been produced without notice to stakeholders, information has been difficult to access, questions about errors and differences cannot be answered by Council officers. The statistical analysis does not seem sufficient to justify the plan.

Why also is the plan narrowly focussed on Wellington City, whereas any increase in population is likely to be spread across the greater Wellington region? The response to Covid19 has shown us that many people can work from home from the Hutt Valley, Porirua and Kaptiti. There is now considerable doubt about whether increased population will want to live in the central city.

Lack of information on key areas, such as the infrastructure impacts, make it very difficult for residents to make well informed submissions.

Residents also need more information on the relationship between the Spatial plan and the District plan that is also up for review. Would agreement to key components of the spatial plan effectively prescribe and limit considerations that should be considered within the District Plan?

The submission deadline of 5 October has not allowed sufficient time for people to understand the implications and to prepare submissions. We are personally aware of many local residents who were unaware of the Spatial Plan process and the implications for Mt Victoria and their homes. We request an extension and further relevant information to enable proper consultation.

6. A better way forward

We are not against more housing or more affordable housing but it is vital that we all learn from our history and avoid another acrimonious Melksham Towers type fiasco where planning becomes the prerogative of a group of experts 'who know best' and are prepared to side with developers at the expense of affected residents. To avoid such a situation occurring we recommend:

- a) An extension of the Spatial Plan consultation phase, with residents provided with quality information to allow them to make considered submissions
- b) A phased development approach, so that it first takes place in areas that are already zoned for high density regeneration e.g. Te Aro flat between Kent Terrace and the Terrace/Willis St and either side of Adelaide Road

- c) A delay in increasing density in inner suburbs until we see how many can be absorbed in central Wellington and until we have a much better understanding of population increases
- d) An actively planned development process, rather than *laissez faire*, so the Plan does not give rise to low quality, inappropriate development in the wrong places.
- e) Further consideration about how effective safeguards can be put in place to ensure appropriate retention of character and quality, well built weathertight dwellings in Mt Victoria.

Appendix

Council actions appear to be at odds with Spatial Plan

Currently 150 years of Wellington City Council is being widely marked and celebrated. At the exact same time Wellington City Council has presented the city with a Draft Spatial Plan which allows for the unchallenged disposal of pre 1930's buildings. This is the first 60 years of Wellington's heritage available to be permanently destroyed without notification.

Wellington City Council states:

"A spatial plan is essentially a 'blueprint' for our city that sets out a plan of action for where and how we should grow and develop over the next 30 years."

I would like Wellington City Council to note the following points that give me great cause for concern in regard to this plan and the damage that will be done - damage that will not be recoverable.

- It has taken 150 years for Wellington to get to where we are today continuing to appreciate and pay tribute to our heritage. Our buildings are a significant part of the essence of Wellington. Why is there now such a hurry? At the very least a phased approach must be explored.
- There is an unreasonable time frame in place for the consideration of the Spatial Plan proposal that has wide and forever consequences. This plan creates more questions than it provides answers.
- Wellington City Council social media sites, marketing sites and publications regularly carry images of the slopes of Mt Victoria, city Circa 1900 buildings and other inner city suburbs. Recently the Wellington City Council lamented the loss by fire of an inner city 1898 building. Public press releases by the Wellington City Council reported "For Heritage Manager Mark Lindsay, the loss of 128 Abel Smith Street has deprived Wellington of a unique and hugely important part of the city's heritage." Wellington City Council described the sadness of losing a building that "has held a special and sometimes controversial place in our city's history". These comments about the loss of heritage directly contradict the proposals in the current Draft Spatial Plan of allowing pre 1930 heritage buildings to be demolished without question.
- Wellington City Council must be taken to task for its own poor performance in the lack of good administration in controlling the provision of additional housing. We are asked to trust Wellington City Council, architects of Wellington and the developers of Wellington. This is simply not possible?
- Unforgiveable lost opportunity - right now in Taranaki St, Wellington, an apartment development is being built. Wellington City Council has allowed this development to be 2 stories only. This development sits on prime land in the central city hub and was a clear opportunity for the provision of additional housing in Wellington by building higher. How can Wellington City Council ask Wellington to sacrifice our 150 year old heritage in order to provide additional housing while at the exact same time allow precious prime housing land and air space to be squandered? A total failure and total contradiction.
- Wellington City Council offers an Our Built Heritage Incentive Fund to help heritage building owners maintain and strengthen their heritage buildings. At

the same time in the Draft Spatial Plan it proposes that all pre 1930 buildings can be demolished without notification. Another example of contradiction.

I am deeply concerned and I am vehemently opposed to the Draft Spatial Plan.

Di Jordan

[REDACTED]

Mt Victoria

Wellington

(Resident of Wellington for 45 years, 43 of these years being in Mt Victoria)



Submission from Wellington Living Streets to Wellington City Council on the draft Spatial Plan 2020

Contact person: **Ellen Blake**
 Email: **wellington@livingstreets.org.nz**
 Phone: [REDACTED]
 Date: **5 October 2020**

General

Living Streets notes this is a blueprint for current and future land use that needs to provide an overall framework for both the District Plan and other policies. This is the first Spatial Plan that Wellington will have and is built on the work from many other consultations and plans, such as Wellington 2040 and Urban Growth Strategy 2016. The NPS on Urban Development is required to be implemented in Resource Management Act plans within 2 years, and earlier for some parts.

The draft Spatial Plan has a real focus on 'walkability': Wellington is well known for its high rates of walking, and the emphasis on retaining a compact walkable form continues in this Plan. There is a need to provide more direction to ensure walkability in the plan, such as on the important connections with transport infrastructure, and key principles included on what walkability requires.

The walk catchment for public transport is optimally 400m, as after this distance mode change to public transport falls off. Greater Wellington Regional Council, like many other public transport service providers, uses this metric in their public transport planning for all services, and a wider catchment of 800m for high frequency services. Time to walk the 400m is also a required indicator of the public transport catchment. Many Wellington stops would take longer than 5 minutes to walk 400m due to topography in some directions, and also the gross inequities in traffic-light timing for pedestrians. Either walk catchments need to be based on real walk times, or the Spatial Plan needs to include measures on how and when this will be improved.

'Transit-oriented design' requires a focus on pedestrians so that access to public transport is improved and development is centred around the public transport route. This will require a shift in planning emphasis in Wellington from car-centred design that needs to be reflected in the Spatial Plan – it's all about how land is used and allocated.

Walkability

Walkability requires land use planning to include provision for:

Connected walking

- Cul de sacs must be walk permeable, eg snickets and shortcuts are included, and block sizes are small.
- Street frontages need to have 'activated edges'. Planning addresses the issues with buildings, public spaces, the public transport interfaces and street space. This means that the ground floor of all multilevel buildings needs to be 'active', parking should be hidden, streets will be multi-modal, and there are public parks and plazas.

Convenient walking

- It is easy to get there on foot, pushchair or wheelchair
- Services are nearby
- For example, Wellington waterfront is very popular but is disconnected from the city centre by a wide, high-volume vehicle road. The Spatial Plan should include improving the convenience of this key location.

Coherent walking

- Where it is easy to find your way, with footpaths that are easy to follow with defined edges, and markings to aid crossing the road
- Lighting is on the footpath to aid walking
- Wayfinding through use of materials as well as sign posting to make destinations obvious. For instance, on vehicular cul-de-sacs with footpaths or flights of steps leading from them to nearby streets are marked "No through route except for pedestrians". Street names could be included in the fabric of the footpath to make them more legible for pedestrians.

Destinations to walk to

- All suburbs should include the basic requirements of daily living that allow people to have a 20 minute walk to services like fresh food shops, medical services, parks, schools, and nearby jobs or improved access to bus stops and train stations
- Green field developments must include the services required for daily living. It is not clear that the proposed developments will do this. For instance, footpaths are provided on both sides of the road.
- Adequate public space is required for meeting and being, and may be part of shopping areas or in parks. About 80% of public space is roadways, and a significant step up on the amenity of footpaths is required to cater for increases in population and thus walking and active social spaces. Many footpaths in Wellington (including some high-use new ones) do not meet minimum requirements currently.

Accessible spaces for all

- Accessibility requirements for land use planning should include measures for buildings with at least 25% of residential building being accessible to a wide range of

people. All publicly accessible buildings should be accessible and meet the standards in NZS4121

- Accessibility is also required for public and blue/green spaces
- The World Health Organisation recommends that a minimum of 9 square metres per person of green space is provided. In Wellington Central the amount of green space falls as low as 7 m² in the most dense inner city residential areas. The Spatial Plan must include a measure for green space and all new green space should be accessible.
- Regular seating for the 25% of people over 65 who will call Wellington home in the next 10 years so they can more easily walk to their daily service needs and be part of their communities
- Infrastructure is improved so that footpaths are accessible (not currently) using the best practise guidance below
- Shelter and shade in public spaces

Particular considerations

Driveway and garages on the street frontages of properties

- This is a key issue with rules in the current District Plan to limit and contain vehicle use across footpaths being poorly implemented leading to a profusion of vehicle accessways. The more vehicle accessways the less safe and pleasant the footpaths are.
- Active street frontages should be encouraged where the life both on and off the footpath is part of the cityscape. Measures that are required include:
 - Hide vehicle parking from street view
 - Limit garages per property and location of them
 - Limit vehicle accessways/driveways to each property
 - Fence heights must remain low so that vehicle users can see and be seen by pedestrians

Cuba Mall

- Cuba Mall is our one pedestrian-only space in Wellington. This was an innovative and very successful approach to provide for pedestrians. This space should be recognised as a special amenity area in the Spatial Plan.

Wellington waterfront

- Since Wellington waterfront was opened up for public use it has been a very popular place to be. This needs to be retained and supported by making it a special amenity area.
- The impact of climate change must be recognised in any future uses (residential use and high 24-hour occupancy buildings should not be permitted). It is surprising that Te Papa is included as a resilience point, as for example access to this area across unconsolidated ground post-earthquake should not be encouraged!

Basin Reserve to Waitangi Park

- This area should be recognised as a special character area
- It is the largest green space in the central area, and the Canal Reserve has the most potential to be an improved green space
- It has a lot of interest as a walk destination being an inner city open space, with many historic buildings and points of interest, such as old tram paraphernalia. Connection along this important reserve needs to be improved and should be signaled in the Spatial Plan.

Wellington Railway Station

- The Railway Station area requires special recognition as a key centre of intense pedestrian activity associated with public transport. Land use in this area for the future should include a vehicle free forecourt and Bunny Street retaining its open space and greenery. Better at-grade connections to the waterfront and west towards Parliament are needed.

Best practice design

- Include in the Spatial Plan a requirement to meet best practice design for pedestrian infrastructure and services to support the walkable city that is envisaged. The New Zealand Pedestrian Planning and Design Guidelines and RTS14 for blind accessible footpaths (soon to be renamed the Pedestrian Network Guide) with NZS4121 are the most appropriate.

About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: www.livingstreets.org.nz

Our City Tomorrow: A Draft Spatial Plan for Wellington City

**Absolutely Positively
Wellington City Council**
Me Heke Ki Pōneke

We want to hear your views on Our City Tomorrow (the Draft Spatial Plan).

Tell us what you think by answering these questions below

You can post this form to us (no stamp needed) or email this form to: planningforgrowth@wcc.govt.nz

You can also answer these questions online at:

planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form

Make a submission by **Monday 5 October 2020 at 5pm.**

Privacy statement - what we do with your personal information

View our full privacy statement online: planningforgrowth.wellington.govt.nz/privacy-statement

All submissions (including names and contact details) are provided in their entirety to Council officers for the purpose of analysing feedback and to inform you of updates and outcomes of the consultation. Feedback and submissions (including names and suburbs but not contact details) may be available to the public at our office and on our website. Exceptions to how we will share your information may occur over the course of the Planning for Growth project in order to comply with statutory process under the Resource Management Act.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at planningforgrowth@wcc.govt.nz, or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

View Our City Tomorrow (the Draft Spatial Plan) online

planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan

Mobile and accessible version planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Our City Tomorrow: A Draft Spatial Plan for Wellington City (mobile and accessible version)

Downloadable PDF planningforgrowth.wellington.govt.nz > Draft Spatial Plan > Summary of Our City Tomorrow: A Draft Spatial Plan for Wellington City (PDF)

Section 1 - your details *mandatory field

| | |
|--|---|
| Your name (first and last)*: | Philippa Williams |
| Your email*: | [REDACTED] |
| Postal address*: | [REDACTED] |
| Suburb: | Thorndon |
| Phone number: | [REDACTED] |
| Age range: | [REDACTED] |
| Household: | [REDACTED] |
| Preferred method of contact: | <input checked="" type="checkbox"/> Email <input type="checkbox"/> Post |
| <input checked="" type="checkbox"/> You would like to sign up to our email newsletter and receive news and updates regarding Planning for Growth | |
| You are making this submission: | |
| <input checked="" type="checkbox"/> as an individual | |
| <input type="checkbox"/> on behalf of an organisation. Your organisation's name: _____ | |

Section 2 - compulsory questions

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|---|-------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 1. To what extent do you agree or disagree with what is proposed with intensification in the central city?*(Refer to Central City fact sheet number 02) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. To what extent do you agree or disagree with what is proposed with intensification in the inner suburbs?*(Refer to Inner Suburbs fact sheet number 03) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. To what extent do you agree or disagree with what is proposed with intensification in the outer suburbs?*(Refer to Outer Suburbs fact sheet number 04) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs, and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?* | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?* | away from special character areas. Outer suburbs near train stations to intensify housing. | | | | | |
| 5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?*(Refer to Character Areas fact sheet number 05) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about character in these suburbs is important to you?*(Refer to Character Areas fact sheet number 05) | Putting Hobson Crescent & Hobson Street as part of CBD is unworkable and outrageous | | | | | |
| 7. What amenities would you want to help create a vibrant suburban centre?*(Please pick your top 5 from the options below.) | <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Proximity to parks and open space <input type="checkbox"/> Access to public transport <input type="checkbox"/> Public/shared spaces <input type="checkbox"/> Commercial activity (retail, cafes, local businesses) <input type="checkbox"/> Employment opportunities <input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Infrastructure (stormwater, water supply, wastewater) <input type="checkbox"/> Social services and community facilities <input type="checkbox"/> Medical facilities/centres <input type="checkbox"/> Access to cycleways/routes <input type="checkbox"/> Walkability within the centre <input type="checkbox"/> Easy walking distance to the centre <input type="checkbox"/> Other (please specify) </div> </div> <p>need serious upgrade.</p> <p>most of these already exist. Infrastructure will</p> | | | | | |
| 8. What amenities would you want to see around future mass rapid transit stops?*(Please pick your top 5 from the options below.) | <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Public shared spaces <input type="checkbox"/> Landscaped spaces/plantings <input type="checkbox"/> Parks and playgrounds <input checked="" type="checkbox"/> Shops and businesses <input checked="" type="checkbox"/> Cafes and restaurants <input checked="" type="checkbox"/> New housing </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) <input checked="" type="checkbox"/> Child care <input type="checkbox"/> Medical facilities/centres <input type="checkbox"/> Bicycle parking <input type="checkbox"/> Other (please specify) </div> </div> | | | | | |

| | Strongly Agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>9. To what extent do you agree or disagree with the following statement?*</p> <p><i>Our City Tomorrow</i> outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be compact, resilient, inclusive and connected, vibrant and prosperous, and greener.</p> <p>(Refer to <i>Our City Tomorrow</i> fact sheet number 01)</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighborhood in a different way.</p> | | | | | | |
| <p>What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighborhood/suburb?*</p> <p><i>Waterfront, Wadeston Green Belt, Supermarket</i></p> | | | | | | |
| <p>What amenities or facilities were missing or could have been improved?*</p> <p><i>none</i></p> | | | | | | |

Section 3 - non-compulsory questions

| <p>1. What do you like about <i>Our City Tomorrow: A Draft Spatial Plan for Wellington City</i>?</p> <p><i>Much of it I approved, but think Molesworth street & Thorndon Quay should be intensified</i></p> | | | | | | |
|---|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>2. What would you change or improve?</p> <p><i>Exclude Hobson Street & Crescent from C.B.D. Allow it to remain in Thorndon.</i></p> | | | | | | |
| <p>3. Is there anything that needs to be considered as we plan for the future that is not provided for in <i>Our City Tomorrow</i>?</p> <p><i>How infrastructure will cope particularly roads in the inner city. No amount of parking if inner city housing intensified</i></p> | | | | | | |
| <p>4. To what extent do you agree or disagree with the following statements considering what is proposed for the inner suburbs:</p> | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--|
| 4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through retention of a general character area to ensure that new development respects the local streetscape and is well-designed. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations where streetscape character is substantially intact. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> <i>in the case of Peninsular</i> |
| 4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> <i>in the case of Peninsular</i> |
| 5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements? View this section of <i>Our City Tomorrow (the Draft Spatial Plan)</i> : planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, greener city. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement? View this section of <i>Our City Tomorrow (the Draft Spatial Plan)</i> : planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Opportunity Sites | | | | | | |
| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
| 6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. We also want to understand the public appetite for community planning processes in specific areas, such as: Te Motu Kairangi/Miramar Peninsula This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route. Strathmore Park This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center. | | | | | | |
| 8. Do you support with the idea of a community planning process for the following areas? | | | | | | |
| 8.1.1 Te Motu Kairangi/Miramar Peninsula <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not sure | | | | | | |
| 8.1.2 Strathmore Park <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not sure | | | | | | |

9. If you answered yes, to the two questions above please respond to the following questions:

9.1.1 What should the **Te Motu Kairangi/Miramar Peninsula Framework** focus on or cover?

9.1.2 What should the **plan for regenerating Strathmore Park** focus on or cover?

| | Strongly agree | Agree | Neutral | Disagree | Strongly disagree | Not sure |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <p>10. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?</p> <p>View this section of Our City Tomorrow (the Draft Spatial Plan):</p> <p> Draft Spatial Plan > View Draft Spatial Plan > Natural & Open Space">planningforgrowth.wellington.govt.nz > Draft Spatial Plan > View Draft Spatial Plan > Natural & Open Space</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>11. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure</p> | | | | | | |
| <p>12. If you answered yes, to the question above what types of assistance would help landowners?</p> <p><input type="checkbox"/> Financial assistance <input type="checkbox"/> Planting <input type="checkbox"/> Other (please specify)</p> <p><input checked="" type="checkbox"/> Advice and guidance <input type="checkbox"/> Weed and pest control _____</p> | | | | | | |
| <p>13. Are there any final comments you wish to include in your submission? If so, please provide your comments below.</p> | | | | | | |
| <p>14. Have you provided an attached document?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> | | | | | | |

Submission against Spacial Plan

Heritage

Hobson Street and Hobson Crescent are the only 2 streets left in Wellington that are largely intact examples of pre 1930's large merchants homes. Mt Victoria and the rest of Thorndon (on the other side of the Motorway) are largely workers cottages. Almost all the homes and residences in Hobson Crescent and Hobson Street have been renovated to a very high standard and they are considered amongst the most desired Streets in Wellington.

Once high rise buildings are developed amongst these beautiful homes they will no longer have the same appeal.

Existing residents are not going to wish to stay if this area is designated CBD for the following reasons;

Carparking

Car parking is already an issue for many of us who don't have adequate off street parking. In the weekends there are plenty of residence carparks, but during the week it is obvious people who are not residents in our streets have procured residents car parks and it is often very difficult or impossible to find a carpark. If these streets are designated CBD what is the council going to do about parking? Will they be metered like the rest of the CBD?

Streetscape

Our streets are beautiful and the huge blot on the landscape is the high rise Hobson Court apartment. If there are more the street scape appeal will be gone. We have bus loads of tourists coming off the ships and much foot traffic of tourists coming to view our lovely streets.

Shading and views

Our houses will be shaded by high rise buildings and lose their pleasant views. Who wants to look into a high rise building?

Consequences of the above

Once the appeal of living in these beautiful historic houses is destroyed, they will revert to flats or be sold to developers and the heritage will be lost forever.

The ability for developers to build high rise buildings on these 2 heritage Streets will make the land extremely valuable and will of course tempt people selling their beautiful houses to take developers high prices.

Once some momentum gathers and a few houses sell, all the houses will be sold to developers and destroyed, or will fall into disrepair as they are rented out and not kept to the same high standard. All of Thorndon was large houses like ours at one time until Molesworth and Murphy streets were developed, and much of Wellington Girls grounds were historic houses as well. Many were also destroyed when the motorway was built. These 2 streets are all that is left of this amazing heritage and it will be a crime to destroy the last vestige's of these very historic merchant houses.

For all these reasons, these 2 streets were given heritage status so the streetscape and houses couldn't be destroyed.

Earthquake

It is very interesting that the Spacial Plan has deemed the part of Thorndon on the west side of the motorway to be unsuitable due to earthquake risk. In fact none of the homes on the east side were affected by the Kaikoura earthquake, however all our homes were affected, and pretty much every high rise over 6 storeys in Thorndon was badly damaged or completely trashed on the east side of the motorway.

Go count the number of buildings in Thorndon (some of them pretty new) that had to be pulled down, or have had to have serious remedial work. Kate Shepherd apartments in Molesworth are a classic example of a relatively new multi storey apartment building that had serious issues, and all the residents weren't allowed back in for weeks after the earthquake. With that in mind, who is going to want to live in these high rise buildings??

Schools

There is access to 3 Schools and a preschool on these 2 streets. How is traffic going to be managed when it's at bursting point now at drop off and pick up times. These streets are way too narrow to cope with the current congestion, how will they cope with hundreds more residents?

Solution

Thorndon Quay, Murphy and Molesworth Streets and the Streets between these 2, have already been developed and there could be more development there without affecting our two unique and beautiful heritage Streets. However it is difficult to see how the earthquake risk can be mitigated in Thorndon and would have thought the Council might have learnt from the Kaikoura earthquake that high rise buildings are not such a great concept in Thorndon.

Conclusion

I accept that Wellington needs more houses but destroying any unique heritage areas is not acceptable. I think there other options in the Spacial Plan, such as clusters around railway stations etc could equally achieve the objectives.