

---

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

**Time:** 9:30am  
**Date:** Wednesday, 4 November 2020  
**Venue:** Ngake (16.09)  
Level 16, Tahiwī  
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

**Have your say!**

*You can make a short presentation to the Councillors at this meeting. Please let us know by noon the working day before the meeting. You can do this either by phoning 04-803-8334, emailing [public.participation@wcc.govt.nz](mailto:public.participation@wcc.govt.nz) or writing to Democracy Services, Wellington City Council, PO Box 2199, Wellington, giving your name, phone number, and the issue you would like to talk about. All Council and committee meetings are livestreamed on our YouTube page. This includes any public participation at the meeting.*

---

## **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](https://wellington.govt.nz/meetings).

**Quorum:** 8 members

---

**TABLE OF CONTENTS**  
**4 NOVEMBER 2020**

---

---

**Business** **Page No.**

---

|   |          |
|---|----------|
| <b>1. Meeting Conduct</b>   | <b>5</b> |
| <b>1.1 Karakia</b>  | <b>5</b> |
| <b>1.2 Apologies</b>  | <b>5</b> |
| <b>1.3 Conflict of Interest Declarations</b>                                  | <b>5</b> |
| <b>1.4 Confirmation of Minutes</b>  | <b>5</b> |
| <b>1.5 Items not on the Agenda</b>  | <b>5</b> |
| <b>1.6 Public Participation</b>   | <b>6</b> |
| <b>2. General Business</b>  | <b>7</b> |
| <b>2.1 Our City Tomorrow: Draft Spatial plan for Wellington City Hearings</b> | <b>7</b> |





---

## 1. Meeting Conduct

---

### 1.1 Karakia

The Chairperson will open the meeting with a karakia.

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

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

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

### 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 Strategy and Policy Committee meeting held on 29 October 2020 was adjourned to 2:30 pm 5 November 2020. As the meeting has not concluded yet, there will be no meeting minutes for the Strategy and Policy Committee to confirm.

### 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. Hear the oral submitters and thank them 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 6<sup>th</sup> August 2020.
3. Wellington City Council consulted on *Our City Tomorrow: Draft Spatial plan for Wellington City* between 10<sup>th</sup> August 2020 and 5<sup>th</sup> 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 first 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 1

|            |   |
|------------|---|
| Author     | Cyrus Frear, Senior Democracy Advisor   |
| Authoriser | Jennifer Parker, Democracy Services Manager<br>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.

## Engagement Forum

Wednesday, 4<sup>th</sup> November 2020

### Speakers

|  |         |
|--|---------|
| Andrew Bowman  | Pg.1    |
| Ann Clark  | Pg. 12  |
| Brian McKenna  | Pg. 24  |
| Catharine Underwood  | Pg. 35  |
| Charlie Crighton   | Pg. 41  |
| Chris Watson   | Pg. 47  |
| Derek Williams   | Pg. 51  |
| Diana R. Ranger (On behalf of Wilton Residents' Society)             | Pg. 55  |
| Eleanor West   | Pg. 61  |
| Grace Carr (Victoria University of Wellington Students' Association) | Pg. 64  |
| Greater Brooklyn Residents Association (Catharine Underwood)         | Pg. 88  |
| Harriet Margolis   | Pg. 93  |
| Helen Law  | Pg. 106 |
| Historic Places Wellington   | Pg. 110 |
| James Graham   | Pg. 122 |
| James Kennelly (On behalf of Property Council)                       | Pg. 127 |
| John Milford (On behalf of Wellington Chamber of Commerce)           | Pg. 133 |
| Kate Hayward   | Pg. 137 |

|  |         |
|--|---------|
| Kate Morris  | Pg. 140 |
| Madison McVie  | Pg. 144 |
| Mark Harrison  | Pg. 148 |
| Martin S. Jenkins  | Pg. 162 |
| Michael Donn   | Pg. 166 |
| Nick Whalley   | Pg. 172 |
| Patrick Morgan   | Pg. 196 |
| Paul Blaschke (On behalf of NZ Centre for Sustainable Cities)        | Pg. 200 |
| Peggy Klimenko   | Pg. 215 |
| Peter Steven   | Pg. 221 |
| Phil Kelliher  | Pg. 226 |
| Raewyn Hailes (On behalf of CCS Disability Action Wellington Branch) | Pg. 231 |
| Rhys Phillips  | Pg. 237 |
| Rhys Phillips (On behalf of Matthew Pankhurst)                       | Pg. 241 |
| Rhys Weyburne  | Pg. 246 |
| Stephanie Cairns   | Pg. 251 |
| Stephen Minto  | Pg. 254 |
| Steve Walters  | Pg. 259 |

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15294](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

---

**Submitter Name:** Andrew Bowman

**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?**

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 completely disagree with the assumptions you've used to come up with 80,000 therefore this is a misleading and inarticulate question. Increasing density must happen - but it must happen in areas where it will not impose negative externalities on existing residents. I understand the benefits of increasing density in Wellington for the compact nature of our city and the efficiencies it brings to infrastructure provision. However, you do not seem to have placed much, if any, value on the benefit that the character of our inner



suburbs bring to the city. Further density should be prioritised on the Te Aro flat, and along existing arterial routes (Kent, Cambridge Terrace, Adelaide Road, Wellington Road, Old Hutt Road, Thorndon Quay) and around suburban centres. Only IF this proves to be insufficient, should changes be considered to the character inner city suburbs, and then, only through resource consent so that the impact of individual proposals can be considered within their true context.

**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 view of Wellington is defined by the character of Wellington's inner suburbs. This website uses images of those suburbs as the view of Wellington, and yet your proposals will largely destroy that character.

Mount Victoria is defined by its location and its character. Villas and cottages that are close to the footpath, cheek by jowl, give Mt Victoria its fine-grained, welcoming feel and culture. Being so close to the street and close to your neighbours makes Mt Victoria an open, welcoming community where people know their neighbours. This is what defines its character. Gated communities, like Zavos Corner on Pirie / Brougham Street corner, do not contribute to this fine-grained, open culture. Neighbours can't get into the complex. You can't meet your neighbours. Council officials seem to love this development, yet don't have to live with it. Architects seem to like it too - yet also don't have to content with the closed, unwelcoming culture this type of development creates.

**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), Walkability within the centre

**Other:** As a note, three waters infrastructure is not an 'amenity'. Why is this an option for an 'amenity'? By definition, its 'infrastructure'. The community can't exist without it.

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

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, Shops and businesses, Cafes and restaurants

**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?**

Green space and street trees.

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

Wellington City Council produces green space poorly and poorly selects street trees, and then maintains them badly. While I had the advantage of Waitangi Park being close to me, many others didn't, and would have had to make do

with very poor access in the central city to green space. I accept that parks are expensive to build, but surely in that case the council should prioritise green space in other ways, through things like pocket parks and street trees and plants.

However, Council fails to plant and maintain plants where residents don't have access to parks. There are at least three spaces for street trees on Lambton Quay where the kowhai trees planted have died and not been replaced. Council surrounds tall street trees with permeable paving - rather than using live plants which would reduce surface runoff and provide attractive green space at a human level.

Your most recent example of a "pocket park", Grey Street, has taken large, leafy green trees away and replaced them with small deciduous trees. I understand the attraction of deciduous trees in allowing light flow in the winter, however, your redevelopment of this park has resulted in NO greenery for 6 months of the year. This seems to be completely counter to what people have said they want in your consultation. You also plant tiny, poorly developed specimen trees which are frequently subject to vandalism, and therefore need to be much bigger and better developed to survive in an urban environment.

Courtenay Place at Taranaki Street is another good example of your poor practice in creating urban spaces. The trees you have planted here are not looked after, and consequently look terrible. There is frequently no greenery here because you have planted deciduous trees, paved everything, and covered the bases of the trees with metal grates. This area needs living plants to make it an attractive and desirable place to linger - yet it frequently has none because of your poor choice of trees and your failure to plant any other kind of plant.

Auckland's Wynard Quarter is a much more attractive place to spend time as an inner city location. You should look to emulate the success of that kind of urban development.

### **Non-Compulsory Questions**

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

I think the aspirations are worthy - but I think your interpretation of how to achieve them is fundamentally flawed.

2.

**3.** I think a focus on growing in the suburban centres, and on main arterial routes is appropriate - but then you've proposed a laissez-fa

**4. What would you change or improve?**

You say in your summary document that you have heard what people said they wanted through submissions process - but you haven't. I submitted on your earlier processes, and supported the options favouring density over spreading out. However nowhere in any of these processes did it suggest that increasing density rather than spreading out would require the loss of our heritage and character. I don't think many other people submitting in these earlier consultations thought that that is what they were supporting either. I feel like you have either misled the city's residents, or you have completely ignored them. Either is unacceptable.

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

Appropriate recognition of the value of character to the benefits afforded the residents of Wellington.

**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.**

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.**

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?**

Taking the community along with you before you propose significant changes in density.

Supporting mixed use development that makes changes that are appropriate steps up in density rather than hotch-potch changes everywhere (i.e. allowing infill housing i

**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?**

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.**

The attachment to this submission should be read and accorded the same weight as the responses in this guided submission form.

**Have you provided an attachment? Yes**

**Individual submission of**

[REDACTED]

[REDACTED] Mount Victoria, Wellington

[REDACTED]

This supplementary document should be considered a key component of our submission. It is to be read alongside the answers we have provided in Council's online submission form and accorded equal weight.

*Process*

Council process through this submission process has been poor. Council officers seem not to be able to respond to questions about it, and have not justified sufficiently the rush to produce it. The process is sloppy and we do not believe it stands up to the requirements of the Local Government Act.

Releasing additional information right at the end of the consultation period ("Citywide Estimated Growth Figures" released late in September) is extremely poor practice at best, and is deliberately misleading at worst. This information fundamentally underpins all of the arguments Council officers have made to support the need to densify Wellington's residential areas, which is the justification for your proposals to destroy the character of the inner suburbs. Failing to tell anyone about its release (we are signed up to your website for updates and have received no such information) is misleading. This failure in your process opens the entire consultation process to accusations that it has deliberately misled the public. I do not think this process would be supported by a judge tasked with considering whether the processes required under the Local Government Act and the Resource Management Act have been adhered to.

*Statistical analysis – your data does not support your arguments.*

Your statistical analysis does not support the proposals you have made. This is a fundamental requirement of good policy analysis and good planning. Your data hurriedly released in September reveals that you are projecting that Mt Victoria needs to provide for an additional 92-188 dwellings over 30 years. This level of development does not justify destroying nearly all of the character in the suburb – it could be easily achieved under the existing district plan provisions.

Relying on the original data to support your analysis is irrational. It is an illogical argument and does not withstand the scrutiny required under the Local Government Act.

*Illogical arguments do not support the proposed changes – so are fundamentally flawed.*

Your arguments are not logical. Starting from an assumption that growth should be spread evenly across the city is plainly wrong. Stating that no development feasibility has been considered is an illogical position to take, since the feasibility of development is fundamental to the proposition that

a suburb 'needs' to accommodate additional dwellings. Mt Victoria is already an extremely dense suburb in comparison to other inner suburbs, and even more so in comparison to the outer suburban town centres. Increasing density will be much more likely to occur in the outer suburb town centres and on Te Aro flat because the land is cheaper and in larger parcels– so this is where density should be promoted if that is actually what you want to achieve.

*The evidence Council has gathered in order to identify options and consequently, proposed solutions, does not support the solutions identified.*

Current District Plan rules recognise “inner suburban neighbourhoods containing significant concentrations of older buildings that contribute to the distinctive character of the local area”. This is currently recognised by the 1930s demolition rule and rules around the external appearance and siting of new infill and multi-unit developments.

Boffa Miskell’s Report reveals that nearly 90% of pre 1930s houses in Mount Victoria provide a primary contribution to character<sup>1</sup> or they are contributory<sup>2</sup>. Even including post 1930s houses, 79% of Mount Victoria dwellings were assessed in the primary or contributory categories. Including those assessed as neutral<sup>3</sup>, the number of properties that have a primary contribution, contribute to the character or are neutral in regard to character, amounts to 93% of dwellings. However, despite residents identifying this as an important attribute of the things they like about Wellington, only approximately 45% of all properties in Mount Victoria are covered by the proposed character sub-areas. This identifies that the Council’s proposals do not deliver on the objectives of the residents.

It is not rational to assume that you can then only maintain character protection for approximately 38% of the character dwellings in the suburb and still have a ‘character’ suburb – one which the residents of Wellington have already identified as a fundamental characteristic of their city.

The Boffa Miskell Study is also a subjective process where a significant number of properties were graded as ‘neutral’ when they are distinctively character properties. Many character properties have, unfortunately, been allowed to degrade over time. Many, however, are now being progressively upgraded and renovated, restoring the character that the experts at Boffa Miskell have evaluated at a single point in time. Merely grading houses at a point in time and deciding that they don’t contribute to character implies that character doesn’t evolve over time – even with District Plan rules in place this has always occurred – and has the effect of making character basically irrelevant. This seems to make the process of having considered character – and finding a contribution rate of 90% - a pointless exercise that has been ignored by the Council planners that produced this proposed spatial plan.

---

<sup>1</sup> The assessment was that the attributes that make up pre 1930s character are largely intact or exhibited and predominantly illustrate the characteristics described in the District Plan Residential Design Guide for Mt Victoria.

<sup>2</sup> The attributes to determine contribution to character have been modified or redeveloped, but most of the characteristics described in the District Plan Residential Design Guide for Mount Victoria are illustrated or still visible.

<sup>3</sup> The character assessment attributes neither exemplify nor detract from the characteristics described in the District Plan Residential Design Guide for Mount Victoria.

*Proposed character sub-areas are flawed – undermining the decisions sought*

While Council has commissioned a character study by Boffa Miskell, it seems to have completely ignored its findings when it identified the proposed character sub-areas. The evidence identified in the Boffa Miskell Study does not support the Council's proposals about character retention – many of the areas and dwellings identified in the Boffa Miskell Study as contributing to the character of Mt Victoria are not covered by the proposed character sub-areas. Many of the Council's proposed character sub-areas also do not seem to conform to the description of character that is 'deserving' of protection.

*Examples*

- Travelling north on Brougham Street from Pirie Street, all of the properties from Embassy Court are strongly original, well-maintained character properties, yet all of them are excluded from the proposed character sub-areas. Even Embassy Court, while not Victorian character, is a good example of density done well in scale with the houses around it.
- It is illogical to claim that all of Queen Street contributes, but none of Brougham Street from Queen Street to Elizabeth Street contributes when all of these properties display the characteristics identified in the Boffa Miskell Study as defining pre 1930s character.
- The omission of Tutchen Ave is obviously wrong given the character contribution it makes. The same is true of lower Ellice Street.
- Council has identified that all of the houses in Caroline Street contribute – see below:



However, Council has also determined that none of the houses around the corner on Roxburgh Street, directly next door to protected dwellings on Caroline Street, contribute at all:





This is obviously incorrect. Protecting houses that have been substantially changed over time by the addition of garages, whilst not affording the same protection to houses that are clearly original makes absolutely no logical sense.

Given the clearly erroneous and inconsistent application of 'character' to the way that Council is identifying areas to 'protect' through the new proposed character sub-areas, we cannot have confidence that any rigour has been applied to the identification of these proposed character sub-areas at all. This policy is clearly poor thought out and extremely poorly implemented. It should not advance because it does not meet the requirements for rigour required in the Local Government Act and the Resource Management Act.

*Poor understanding of what constitutes 'character'*

People do not only engage with Mt Victoria's character by looking at St Gerard's Monastery and Mt Victoria North. They also engage with it at a street level and along the streetscape. Council's proposals to protect small areas while leaving others completely open to demolition does not respond to the way that residents (current and aspiring) and visitors engage with Mt Victoria's character. Any value in the proposed character sub-areas will be destroyed by allowing the areas around them to be demolished – such as along the western side of Roxburgh Street. Character is seen and appreciated through the streetscape – not just individual dwellings.

As identified in Wellington City Council's own Mt Victoria Heritage Study Report from June 2017,



“Mount Victoria demonstrates historical patterns of development and conveys a sense of continuity and collective memory.” It goes on to identify the heritage significance of Mt Victoria in a way that identifies how we engage with heritage and character within a community / streetscape, rather than just through individual buildings:

“Mount Victoria is significant as a reasonably intact, large area characteristic of the early development of Wellington’s residential area. Many of the remaining older buildings have been substantially modified over time. However their original primary form generally remains apparent. Despite some infill multi unit housing in recent decades, the area has a visual unity and coherence based on the character of its original buildings. This coherence is derived from the general similarity of building type, scale and materials and distinctive patterns of building alignment and orientation.”

“Mount Victoria’s distinctive character is derived from the collective presence of large numbers of original buildings. Together these building create strongly identifiable formal and spatial patterns. In this respect, individual landmark buildings and particular styles are less important than the size, shape, orientation and position of dwellings and open space”

Pg 6. [our emphasis]

Protecting small pockets of (poorly identified) character dwellings will not protect the character of the suburb. Your proposals fail to provide sufficient weight to the benefit provided by retention of character and heritage. People desire the location and amenity of Mount Victoria because of its character and heritage – allowing this to be destroyed haphazardly will reduce the number of people who want to live in Mount Victoria, which seems to be the basis on which Council is advancing these proposals.

*The lack of development feasibility means the proposals will not deliver on Council’s objectives*

Failing to consider development feasibility completely undermines Council’s proposals.

The problem Council has scoped is that population growth must be accommodated in Wellington City, and therefore decisions need to be made about the mix of growing up and / or out to provide more dwellings. Mount Victoria – along with many of the inner suburbs – consists of small land parcels in mixed ownership. Removing the restrictions on the demolition of pre-1930s houses only responds to the problem you have identified if it is a contributing factor that prevents new, dense dwellings being constructed. However, the small size, narrow and rectangular shape and the high cost of land parcels in Mount Victoria are the predominant constraint on achieving denser development. Your proposals do not respond to these elements of the problem, so Council’s proposal fail to logically deliver on the desired objectives.

Even more concerning, Council also seems to believe that removing the resource consent requirement for the demolition of a house built before 1930 will also contribute to Council’s objective to improve the affordability of housing. Section size and land cost in Mount Victoria also indicates that this is unlikely to be achieved by Council’s proposals.

Removing the restriction on demolishing pre-1930s houses will not improve the affordability of housing in Wellington. Nor will it increase the density of development in Mount Victoria. It will likely result in haphazard destruction of character in Mount Victoria, by enabling existing, single character

houses to be replaced by new, modern-style single houses for affluent families. To the extent that this proposal enables character houses currently divided into flats to be demolished, it seems more likely to result in lower density of housing as these are replaced with a single expensive, new dwelling for an affluent family.

### *Conclusion*

The proposal to remove the existing rules that restrict the demolition of pre-1930s houses in Wellington's character inner-suburbs fails to respond to the problems that Council has identified that it wishes to resolve. The Council's proposals are not supported by the evidence that the Council officers have collected – and in fact the evidence is largely counter to the proposed solutions promoted. The Council's process of promoting the evidence it has gathered has also been poor, placing the entire process at risk of failing a judicial review.

Not only should the Council halt this process, it should explicitly recognise that these proposals do not logically deliver a solution to the problems the Council has identified. Merely resolving the poor process will not make this proposal any more logical, and therefore no more desirable.

Growth does need to be accommodated in Wellington City, and in a way that appropriately provides a range of housing typologies and housing locations to enable people choice in their home and working environment. The Council's proposal to remove nearly all character provisions in the inner suburbs does not respond to the need to enable growth in housing numbers and density because of the realities of development economics. If implemented, these proposals will not result in denser or more affordable housing in the inner suburbs. This proposal should be withdrawn and new proposals supporting enhanced development densities in the CBD, Te Aro flat, Kent Terrace, Cambridge Terrace, Adelaide Road and surrounds, Wellington Road and surrounds, and the outer suburban centres reconsidered and prioritised.

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [16329](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Ann Clark

**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 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?**

Given COVID I don't believe we will have 80k more people 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?**

Housing is of a scale + style which enables green views. Which enable engagement at street level - social cohesion + social engagement.

**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?**

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, Shops and businesses, Cafes and restaurants

**Other:** Shelter from our weather wind + rain

**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 space

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

Narrow footpaths + narrow roads prevented 2m distancing for pedestrians. Much was made of facilitating cycling but nothing for pedestrians.

**Non-Compulsory Questions**

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

I am delighted my street is protected by appalled at what is not protected.

**2. What would you change or improve?**

Extend pedestrian zones to holloway Road. All the hills in my view including demolishing the halls of residence which loom over valley + transmit noise at all hours of day + night.

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

If you want people to be crammed together you need to build respect + social cohesion. Our houses in Epuni are already built to boundary so routine maintenance needs you to get on with your neighbours.

**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.**

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.**

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.**

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.**

Strongly 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).**

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**

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?**

Whatever the community deems important

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

Whatever the community deems important

**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?**

Weed and pest control

**Other:** Shelter from our weather wind + rain

**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

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](mailto:planningforgrowth@wcc.govt.nz)

You can also answer these questions online at:  
[planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form](http://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](http://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](mailto: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](http://planningforgrowth.wellington.govt.nz) > Draft Spatial Plan > View Draft Spatial Plan

**Mobile and accessible version** [planningforgrowth.wellington.govt.nz](http://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](http://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)*:   | ANN CLARK   |
| Your email*:   | [REDACTED]  |
| Postal address   | [REDACTED]  |
| Suburb:  | AROE VALLEY   |
| 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: _____   |   |

|   | 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 neighbourhood/suburb?*</p> <p><i>Green space</i></p> <p>What amenities or facilities were missing or could have been improved?*</p> <p><i>Narrow footpaths + narrow roads precluded 2m distancing for pedestrians. Much was made of facilitating cycling but nothing for pedestrians.</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>I am delighted my street is protected but appalled at what is not protected</i></p>   |                          |                                     |                          |                                     |                                     |                          |
| <p>2. What would you change or improve?</p> <p><i>Extend protection zones to Holloway Rd. all the hills in my view including demolishing the halls of residence which loom over valley + transmit noise at all hours of day + night.</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>If you want people to be crammed together then you need to build respect + social cohesion. Our houses in Epsom are already built to boundary so routine maintenance needs you to get on with your neighbours.</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                 |
| <p>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</p>  | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| <p>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.</p>  | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| <p>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.</p>   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



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?

*Whatever the community deems important*

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

*Whatever the community deems important*

|  | 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><a href="http://planningforgrowth.wellington.govt.nz">planningforgrowth.wellington.govt.nz</a> &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; Natural &amp; Open Space</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>Well I read right thro' section and was no wiser at the end.</i>  |                          |                          |                                     |                          |                          |                          |

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                      *Tree pruning services + removal of waste*

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

14. Have you provided an attached document?

Yes  No

**COMMENT ON SPATIAL PLAN PROPOSAL****Consultation process**

The first I knew of the consultation was an email from the Aro Valley Community Council that planners were to be available on a Saturday when I volunteer and then there was to be a community meeting on the Tuesday 22nd September when I was otherwise booked. I did manage to be at the information desk on the Saturday for a short time. I was simply told for each point I raised that I should make a submission. Not one person from the Council neither official nor elected representative told me the submission had to be on a standard template. I found that out from lunching with a friend who lives in a similarly affected character area on the 1<sup>st</sup> October. I went to Manners St on 2 October to pick up a form and was told be quick as it closes today. I said that was not my information rather it closes Monday 5<sup>th</sup> October. Timing seems most odd given everything else we have had to contend with over this period.

So the consultation has in my view been grossly inadequate.

You email me, and I suspect many other ratepayers, and could have drawn this spatial plan consultation to everyone's attention by email and attach the link. I was emailed with a survey as an input to the spatial plan some months ago so you could have sent me a follow up email. I did ask to be kept informed. I cannot comment on the number of people who are technologically challenged or are in technology poverty who have been disenfranchised by the process. I suspect given recent data from the CAB it's a considerable number.

As someone who uses technology every day, has relevant tertiary qualifications to the subject matter and professional experience in urban planning and research question development I found that the collateral was hard to navigate and the questions were often subjective. I have no idea what a "refined" approach is, nor a "good" mix nor a "continued" emphasis on something I have not observed. There was no printed takeaway to read at the meetings except a map of my area, not the city as a whole.

I am also surprised by a compulsory question on something that does not exist and is unlikely to exist in the next ten years that is the mass rapid transit stops. As someone who has resided in cities that do have mass rapid transit the proffered selection of options seem to me very odd.

**Changes with Covid and other events**

I do not share the view of the Council that nothing much will change as a result of Covid. Firstly Covid or like pandemic will recur, second I think we are overdue for a good shake and we have yet to clear up from Kaikoura. I firmly believe that there will be sea level rise. The Government has already said that there needs to be managed retreat from the coast yet this plan sees intensification on the recovered land and seashore. There will be significant weather events rain and wind. We

have seen what happens in Wellington in high wind, people blown over along with trees; heavy rain sees downtown flooding and flooding in the suburbs. Climate change will impact on the availability of our water, every hot summer we have restrictions and that is with the current population. We have already seen decisions by Government to relocate to the Regions and out of Wellington. The big firms are building in working from home and ongoing use of technology which has implications for the suburbs and the regions. Tertiary students from overseas are less likely in previous volumes. Employment patterns will change and benefit dependence patterns will change including the number reliant on NZ Super. I see coverage on 5 October that the numbers have changed again. Not that I could find it on the website.

I think you should be standing back and doing a futures exercise with the shocks we now know about and can reasonably expect in the life of the building 50 years and the plan 30 years. It also strikes me that a principles based approach would engender more buy in. My other thought is that there needs to be a Regional approach as decisions taken in Wellington will affect Hutt Valley, Porirua and Kapiti Coast and potentially vice versa.

#### My vision for the City

I prefer the vision from the Warren and Mahoney/Boffa Miskell paper CENTRAL CITY SPATIAL VISION states that in 2050 Wellington will be

“A thriving, green capital city framed by the harbour and hills, composed of interconnected, cohesive neighbourhoods that support people to lead healthy lives”

as against the one the Council promulgates.

#### Affordable Housing

I simply cannot see that short of an economic revolution for the whole of New Zealand that any of this proposed spatial plan will generate all housing as affordable. You will need a specific set of investment decisions. None of which are even hinted at in this document. It is not clear who will choose to invest given both current policy settings and the lack of infrastructure. How can WCC incentivise the development of mixed neighbourhoods that are more conducive to community development and better resilience? – or the mix of owner occupiers/long term rentals with short term rentals? Maybe then it will be clearer where and what kind of development needs to happen and possibly generate affordable options for different household types to address our diverse community needs and the homelessness problem. I see a need for more supported housing whether it be for mental health clients, alcoholics or the drug addicted, ex inmates, or young people from fractured families. This needs not only specific infrastructure but also financial support for skilled people to work with these client groups.

### Planning for higher density housing

While I can see the need for increased density as a good way to deal with growth (if it happens) it must be planned around pre-existing transport links and infrastructure. I am assuming that there will be considerable investment to support existing with capacity to support future needs. The current infrastructure is grossly inadequate. Having considerable experience of developing high density housing and papakainga housing you need careful and well planned engagement to establish community buy in to make it work. Building communities does not happen by putting up a blocks of flats (or converting offices into flats) with no regard to the critical need to create an environment that is good for people to live in.

Any increase in density needs to be allied with a strong policy on green space, on good quality design and internal amenities like soundproofing, double glazing, parking, delivery options, and the associated infrastructure such as water, storm water, sewage, rubbish, fire and emergency management and social support. It is not just an issue of numbers of people and numbers of dwellings; it is about types of households and tenure. Much of this will require mandated standards to achieve.

Post Covid our vertical cruise ships that your spatial plan implies will need a substantial rethink with wider corridors, bigger lifts, community space and green outlooks for sanity. Our local park had a survey during lockdown and the majority of votes by way of pebbles were in the mental wellbeing glass jar. I cannot see that the notion of a wider pavement is a parklet or that the paved areas of the waterfront and civic square are satisfactory open spaces. The recent development of the block of flats on the corner of Karo Drive and Victoria St obliterates the view of the Mount Victoria town belt for a substantial number of homes in the Aro Valley. The addition of a wall of 10 storey blocks all the way along Victoria St will wall off the town belt view for even more.

### What it is currently like

My house is built to the boundary. It requires good neighbour relations to enable maintenance. So to replace the roof I had scaffolding on my neighbours section for 11 weeks. To paint the house which was two thirds done at lockdown had scaffolding for all of level 4. Our houses are designed to look out so we protect some privacy. We are all very careful about noise intrusion and can have open conversations to manage that. We are an invested community. It takes time and good will to establish that. The dependence on deliveries during lockdown revealed that there were inadequate delivery options particularly for the flatted community but also to regular homes up many steps and the delivery vehicles challenged with the narrow streets. There was nowhere for trucks to pull up and nowhere to leave large parcels for the flatted communities. Parking continues to



be an issue. It is impossible to park so no car now. I walk pretty well everywhere I am fortunate I can and alternatively take such as Uber. I do want well lit defensible space that I can feel safe walking through.

#### Social Cohesion or social disintegration

You do need to be willing to make it work to live close by each other and with some New Zealanders' penchant for solving problems and slights with fists and weapons you need to design space and buildings to minimise risk. Recent coverage of the issues in Te Aro Park illustrates what happens when there is the lack of defensible space. The Aro St Park is now a liquor ban area and still we have drinking, along with anti-social behaviour and what can be a lovely community amenity so often becomes running the gauntlet. There is a lot of international work about how to build defensible space and create greened areas which are community owned and respected.

I am delighted that two communities have the opportunity to work on their area plans Miramar and Strathmore Park but why can this not be extended to other parts of the city? I am puzzled as to why the whole city is being asked what these areas plans should cover. It is my view that you need to build social cohesion. It does not just happen.

#### Current lack of investment and regulatory situation

There are significant issues with the regulatory framework around flatted accommodation in both low and high-rise buildings. These issues include insurance which is becoming a major problem and issues arising from the Unit Titles Act. These issues must be addressed before further large-scale development is approved.

One block of apartments has been quoted tens of thousands per annum per apartment for insurance not because of earthquake risk but because the whole building is so big it exceeds the insurable threshold. Others have no insurance and are in breach of mortgage covenants and the law as the Unit Titles Act requires replacement insurance. Others pay the insurance but it leaves them on the breadline with an unsaleable property. TVNZ news 3 October commented that insurance costs in the city are the highest in NZ by a substantial percentage We saw in Christchurch that a row of townhouses each with a different insurer could not get their foundations or rooves repaired as the insurers could not agree on what was required. Other home owners in one of the currently protected areas in Wellington city are now being quoted increased insurance premiums simply because their homes are allegedly historic buildings.

The Unit Titles Act needs an overhaul and rewriting as a cohesive whole. People do not know what it means when they buy into a Body Corporate and their governance responsibilities. There are not enough competent property managers

around to support this work. Property managers do not want to manage small blocks not enough money in it.

The current Building Code is about saving lives at the expense of saving the building which could be irreparable after a major Quake. Changing the Code to building to save lives and save buildings will cost exponentially more. The Building Code will need change to address the requirements both for earthquake resilience but also to set the outcomes for successful high density housing in a seismically risky area which has now first-hand experience of pandemic.

It is my view that the current infrastructure of the city is in an unacceptably poor condition to support any more development. Although adequate infrastructure is mentioned, the current state of the systems imperative for public health in the City – particularly pipes for water, storm water and sewage – must have a plan for immediate remediation as a prior commitment before any further development in the inner city takes place.

I do not consider that the fire and emergency management considerations have been addressed at all. We have an atypical geological, seismic and topographical setting which presents enormous challenges for people, development, community and then dealing with emergencies.

#### International context

In the broader International context we have the:

UN Sustainable Development Goals which were adopted by New Zealand in 2015 - in particular Goal 11 – Sustainable Cities and Communities which aims to make cities and human settlements inclusive, safe, resilient and sustainable.

And we have the:

WHO guidelines state “As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5-1 hectare within 300 metres linear distance (around 5 minutes’ walk) of their homes”.

#### The only thing I can agree with

I do support the WCC policy statement that “Open spaces within neighbourhoods and the blocks that compose those neighbourhoods will be deliberately planned for. Enclosed or partly enclosed spaces that provide sheltered, sunny spaces suit Wellington’s climate. The interrelationship of open space to building, the height and depth of buildings to give natural light and comfortable relationships with the street are all open space attributes sought from development outcomes.”

#### ORAL SUBMISSION

I wish to make an oral submission to all Councillors at the Committee Meeting and ask to be notified when the paper is being submitted to the Committee.

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [16250](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Brian McKenna

**Suburb:** Khandallah

## Compulsory Questions

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

Not sure

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

Not sure

**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

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

Our disagreement is not about the spread of proposed intensification but the level of it. The 80,000 maximum projection for 2050 is grossly excessive and even the Median projection of 50,000 is considered unlikely to be reached. This would mean that significantly lower densities could accommodate the increase without the dramatic effect on culture, lifestyle and greenness of these regions. The so-called

"Opportunity Sites" have not been taken into account in this question but should be, as should other undeveloped and/or underutilized land in other areas of WCC territory.

However these are broad considerations. This is not within a lay person's expertise Urban Planners are much better to develop and propose alternatives,

**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?**

Unable to respond as time constraints meant we could only focus on one area

**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:** Availability of short term car parks

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

Shops and businesses, New housing, Community facilities (libraries, community spaces, social services, etc.), Child care, Bicycle parking

**Other:** At some, car parking (park and ride)

**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?**

Open spaces, bush walks, cycle trails, shops, buses, trains, car parking. Green space throughout the neighborhoods, public or private.

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

Lack of protection for existing residential properties, in terms of light, outlook, parking, privacy.

**Non-Compulsory Questions**

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

Very little

**2. What would you change or improve?**

See attachment

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



See attachment but, in addition, restraints on developers re scale of development which should be larger than one existing section at a time, but larger developments with minimum open space requirements

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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).**

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?**

Don't know - that should be up to the community through a proper consultative community development program

**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?**

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?**

**Other:** At some, car parking (park and ride)

**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**

## Attachment to our Submission re WCC Draft Spatial Plan

NOTE: This submission is on behalf of two people, Brian McKenna and Christine McKenna.

### Introduction

This submission to the Council on their Draft Spatial Plan has required a significant and difficult period of research of the available material over a very short period of time. We, like many others, were completely unaware of the plan until 20 September 2020 when invited to a meeting by the Onslow Residents Community Association (ORCA) three days later.

Council's Communication, Engagement and Consultation has been seriously deficient in meeting the requirements of the Local Government Act (LGA) and council's own policy, given that the proposals in the Draft Spatial Plan (DSP), which are the most significant proposed changes in decades, have not been communicated adequately to meet the standards of effective and early communication to "persons likely to be affected or have an interest in" (LGA) this issue.

Particularly, the range of media used was not sufficient to meet WCC's Policy S5, 5.4(3) which seeks input from a diversity of views (e.g. those who do not have computer access) as expressed in 5.4.6. There is significant risk that the net effect will be that it will not be valid to consider the submissions to be representative of residents.

Our concerns apply not only to the Council's draft plan but to the National Policy Statement on Urban Development 2020 (NPS-UD) published on 20 July 2020 by the Ministry for the Environment.

Given the time constraints, and the difficulty of obtaining and processing the available information, we have focused on the Outer Suburbs as defined in the Council's Draft Spatial Plan, although we believe there are significant issues in other areas as well.

### Major Issues raised below:

1. Application of a minimum but no maximum to the number of storeys permitted in Housing Density Type 4b.
2. Incorrect application of Housing Density Type 4b to **all** railway stations not just those on lines providing genuine rapid transit services, specifically the Johnsonville Line.
3. Over application of Housing Density Type 4a – application to centres other than metropolitan centres, i.e. large town centres. Many small "town" or "local/neighbourhood" centres have been included.
4. Effect of removing off-street car parking – solely to aid a move to zero carbon goal which it cannot achieve, instead it will just exacerbate the pressure on on-street parking.
5. Lack of workable initiatives for the "Greener" goal.

For reference, we have included below Policy 3 from MFE's NPS-UD and listed the council's Housing Density Types for comparison.

### NPS-UD section 2.3 Policy 3

"In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) in **city centre zones**, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

- (b) in **metropolitan centre zones**, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and
- (c) building heights of [at] least 6 storeys within at least a walkable catchment of the following:
  - (i) existing and planned **rapid transit stops**
  - (ii) the edge of city centre zones
  - (iii) the edge of metropolitan centre zones; and
- (d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:
  - (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
  - (b) relative demand for housing and business use in that location.”

## WCC Housing Density Types

In the Council’s Draft Spatial Plan [PDF version](#), (which is the still the only version available on paper to the public but available at public libraries “for reference only”, i.e. you cannot take a copy away) the following “Proposed Density Housing Types” are defined:

- Type 1** Low density 1-2 story detached, semi-detached and infill housing
- Type 2** Medium density 2-3 storey terrace type housing.
- Type 3** Medium density 3-4 storey apartments.
- Type 4** Medium density *up to* 6 storey mixed use & apartment buildings.
- Type 5** High density *up to* 8 storey mixed use and apartment buildings.

However, on the Draft Spatial Plan [online only version](#) “Type 4” becomes “Type 4a” and a new Type is introduced, presumably to meet the requirements NPS-UP Policy 3(c) (i) above:

- Type 4b** Medium density *at least* 6 storeys mixed use & apartment buildings

In the sections outlining the rules for individual suburbs the following words are added to Type 4b: “in the [suburb] commercial centre and within a [x]-minute walking catchment of railway stations.” Mostly “x” is 5 minutes, but for Johnsonville and Tawa stations a 10 minute walking distance is applied for reasons unstated.

Finally, for reference, we quote the following statements made in the Draft Spatial Plan. These are present in both the Northern and Western sub-sections of the Outer Suburbs section of the Draft Spatial Plan.

### “What’s impacted by the NPS-UD 2020?”

“To meet the direction of the National Policy Statement on Urban Development (NPS-UD) 2020, the Council is required to enable development of **at least 6 storeys** within walking distance of **railway stations**. This requirement applies to the suburbs of Tawa, Linden, Johnsonville, Khandallah, Ngaio, and Crofton Downs. 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 ‘metropolitan centres’**. This applies to Johnsonville town centre.

“The Council must give effect to these requirements as part of the upcoming District Plan Review process and **these changes are outside of the scope for feedback** on the Draft Spatial Plan.”

This the last of these paragraphs may be appropriate if the one above accurately reflected what the NPS-UD said, but it does not. I therefore exercise the right to comment on their inaccuracy, and the invalid application of them in Issues 1, 2 & 3 below.

Note that the Mayor has given an assurance, having heard these concerns from us and others, that this feedback **will** be considered.

## Issue 1 – No limit applied to number of Stories in Type 4b

The definition of Housing Density Type 4b uses the words “*at least 6 storeys*”, words taken verbatim from the NPS-UP section 2.3 Policy 3(c) quoted on page 1, i.e. Tier 1 councils are required to **enable** “building heights of [at] least 6 storeys within at least a walkable catchment of ... existing and planned rapid transit stops”.

Councils are not required to enable an unlimited number of storeys – they can (and should) define their own maximum number as long as it is 6 or above. As it stands, in the council’s definition of 4b, there is nothing to prevent development of buildings well in excess of Type 5 even.

In addition, whilst all the other “Types” allow for less than the maximum. As it stands, in Type 4b zones 6 storeys is a **minimum**. In other words, in Type 4b areas, a building of less than 6 storeys would never be permissible, regardless of size of the property or other factors.

We believe that this **must** be resolved by expressing a **maximum**, i.e. “up to 6”, as does Type 4a, which would meet the intent and requirement of the NPS-UD.

We also feel that the application of Type 4b (as well as Types 4a and 5) should take into account the topology of the area, i.e. 4 storeys and above should **not** apply at the top of a hill.

## Issue 2: Inappropriate application of Housing Density Type 4b

NPS-UD section 2.3 Policy 3 quoted on page 1 clearly says “within a walkable distance of (i) existing and planned **rapid transit stops**”. This does not mean only railway stations, as stated in the extract from the DPS above – it can also mean bus stops. And it does not mean **all** stops – it only means those on a **rapid transit service**.

The following definitions in the NPS-UD, section 1.4 “Interpretation”, apply:

“**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”

The council’s Draft Spatial Plan has applied “Type 4b” only to railway lines but not to bus services as set out in the NPS-UD. This is perhaps appropriate as we are not aware of any bus routes or services in the region which have dedicated bus lanes for the majority of the route, or use separate structures such as in the Auckland Northern Busway.

However the applicability of the term “rapid transit service” to the Johnsonville Line is inappropriate. This current service is neither **frequent, quick nor reliable** due to the single track line built on ground prone to slips or seismically unstable, with limited passing bays and tight (noisy) corners. Nor is it **high-capacity** and in recent years has seemingly lost users, so that existing capacity is underused, even at rush hours. This is probably due to multiple factors, such as infrequency, lack of speed, and unreliability, but also to the lack of

park and ride facilities. Whilst capacity might be somewhat increased by running 6-car trains rather than 4, this capacity would remain limited and would not improve frequency, speed or reliability.

MfE's guidance document on implementing NFS-UD indicates that Wellington "commuter rail service" appears to confirm that the Johnsonville Line should be considered a rapid transit service. The following need to be considered:

1. This [what, the NPS-UD???) is a national document. There is a likelihood that peopling thinking nationally rather than locally may have been thinking of much bigger commuter routes from the north, e.g. the Main Trunk Line or the Hutt Valley/Wairarapa Line. They may have been unaware of the significant issues on the Johnsonville Line.
2. If they were aware of the fact that the Johnsonville Line does not meet the criteria for a rapid transit service this needs to be raised with MFE and confirmed by them.

The only way of achieving rapid transit status on the Johnsonville Line would be to double-line it. This would involve enormous cost, given the seven tunnels and four overbridges that would have to be doubled in width and, potentially, space under three underbridges increased. This may be impossible or unwise, particularly at the Kawiharawhara end of the Ngaio Gorge. Also, five of the stations on this line would have to have a second platform built and it is difficult to see how this could be done.

The bus routes serving Ngaio, Khandallah, Broad Meadows and on to Johnsonville present little opportunity to add capacity to the stops along the way. The topology already provides significant challenges given that much of each route is on narrow, winding and steep roads, and the key access sections on Ngaio Gorge and Onslow road are slip prone.

They could not meet other criteria of the NPS-UD definition of rapid transit service quoted above. None are a "permanent route ... that is largely separated from other traffic". The few existing bus lanes are not "permanent" (24x7) most applying only during rush hours on the side of the road affected at that time. Nor are they "largely separated", as they only covering a minor part of any route, with frequent incursions by other vehicles trying to access carparks, driveways or side streets. Also, use of double-decker buses to increase the "capacity" characteristic is not possible due to the challenging topology.

It is therefore essential that, except perhaps for their "commercial centres" which could be changed to Type 4a, Khandallah, Ngaio and Crofton Downs Type 4b zones should be changed to Type 3 at most, as is proposed for other the Outer Suburbs of Karori, Kelburn, Brooklyn, Island Bay, Haitaitai, Lyall Bay and Miramar. Type 4a would be inappropriate for the same reason stated in Issue 3 below, and also because it would not be possible to increase the capacity of public transport services to support the ensuing increased population growth.

Johnsonville should only have Type 4b zoning if real rapid transit can be provided, perhaps by dedicated bus lanes down Ngauranga Gorge, however Type 4a could be acceptable, as non-rapid public transport could be increased via Ngauranga Gorge without dedicated lanes, by increased use of double-decker buses.

### Issue 3: Over application of Housing Density Type 4a

As shown in the extract from the NPS-UD on page 1, Councils are required to enable development **of at least 6 storeys within walking distance of the edge of 'metropolitan centres'**. This would appear to be equivalent to the way in which council has applied Type 4a to Johnsonville town centre, however:

- The NPS-UD also uses the words "**at least 6 storeys**", which is fine in the context of that document, however, as it should have done for Type 4b, the DPS rightly sets a limit for Type 4a, i.e. "**up to 6 storeys**".

- The DPS uses the words “commercial centre” not “metropolitan centre” without defining either term.

Whilst the NPS-UD does not define “metropolitan zones” it does define “Centre Zones” in section 1.4 “Interpretation”, as meaning “any of the following zones:

- city centre zone
- metropolitan centre zone
- town centre zone
- local centre zone
- neighbourhood centre zone

The order implies decreasing size, in which case a metropolitan centre is bigger than a town centre, but may be considered a big town. This is confirmed by the MFE document “Guidance for 12 District Spatial Layers Standard and 8 Zone Framework Standard [Guidance for 12 District Spatial Layers Standard and 8 Zone Framework Standard](#)”. This document says, on Page 9:

“The metropolitan centre zone is intended to be predominantly for a broad range of commercial, community, recreational and residential activities. ... It is intended to be **secondary to the city centre zone** in terms of scale and function, **and above that of the town centre zone.**”

I consider that many of the “Commercial Centres” to which the Council has applied Type 4a are little more than what the NPS-UD calls “local” or “neighbourhood” centres, for which 6 storeys and above are **not** required, but have been applied at the Council’s discretion, and are excessive.

In the Outer Suburbs, the current draft plan only uses Type 4a in Churton Park, Newlands, Karori, Kelburn, Haitaitai and Miramar. Of these only Miramar and possibly Newlands and Karori, appear large enough to be called “town centres”, let alone “metropolitan centres” so consideration should be given to whether they should have Type 4a applied.

However Churton Park, Kelburn and Haitaitai could only be described as “local centres”. These areas should be reduced to Type 3, 3-4 storeys. As we all know, developers always aim to be permitted the maximum possible in order to maximise their profits, so 4 storeys is likely to be the majority!

As stated in Issue 1 above Type 3 should also be the maximum applied to the centres of Khandallah, Ngaio and Crofton Downs. It is worth noting that the commercial centre of Khandallah is often referred to as Khandallah Village – this term does not indicate a large town or metropolitan centre!

## Issue 4: Effect of removing off street car parking

This issue is perhaps more related to the National Policy Statement on Urban Development 2020 (NPS-UD) which mandated in Policy 11, that, in relation to car parking:

- the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and
- tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.

Section 3.38 of the NPS-UD says “If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks.”

Wellington City Council, as a Tier 1 territorial authority, has had little option but to abide by this directive. The option is still available to Council to stipulate rules “relating to parking dimensions or manoeuvring standards to apply *if a developer chooses to supply car parks*”, but let’s face it – how many will?

No explanation or justification of these requirements is contained within the NPS-UD, and I can find little in the Council’s Draft Spatial Plan or the council’s [Parking Policy Adopted August 2020](#) either, other than comments about it supporting the city’s goals of being ‘zero carbon’. Thus it is presumably intended to discourage the use of private motor vehicles and encourage the use of public transport. **In reality what it will do is exacerbate the pressure on on-street parking.**

Even with the existing requirement for 1 off-street park for every residence results in such pressure. A local apartment block I am aware of has a single car garage for each apartment. These are minimum size however, and a number of them are being used as storage space or workshops instead. The occupants still have at least one car however, which they park them on the street. Many apartments are owned by landlords and rented to groups of individuals, one per bedroom. Often each person has their own vehicle. Where do they park them? Well there may be one park on site but the rest will be on the street!

Some people see a future where private cars will no longer be used because public transport or car sharing will be sufficient. This might work in London, but it is hard to see it happening in NZ any time soon. It would require a major culture shift and a huge improvement in public transport.

We do not just use cars to go into the CBD – in fact many of us do not use cars if we are just going into the CBD. For most of our trips by car into the CBD that is not our destination. Our topology is such that the only reasonable way of getting to many other suburbs is **through** the CBD. We may also need to collect or deliver goods that because of weight or volume, cannot be carried to or on public transport. For Northern and Western suburbs, even a trip to the Happy Valley land fill requires a trip through at least the edges of the CBD!

Some of us do significant voluntary work in areas that require crossing the city and require transport of resources that would be impossible to carry on public transport.

We use cars because there is no reasonable way of getting where we need to go. In the Wellington region public transport is very radial. Buses and trains only go to and from the CBD. If I want to go to Eastbourne then I would need to get a train into Wellington, a train out to Petone and a bus to Eastbourne. Travel time would be horrific and waiting times often far worse.

We use cars to go places where there simply is no viable public transport; to beaches, walking tracks, sports venues – some of us even travel regionally to places not accessible by public transport! Parents also need to take different children separately to different sports venues on a Saturday morning at different but overlapping times. For these reasons, multi-storey apartments are likely to have a preponderance of residents with cars. Where an apartment is occupied by a group of renters, each is likely to own their own car.

Therefore we believe that reducing the number of off-street parks will do little to reduce the number of cars owned per head of population. Nor do we see it achieving movement towards zero carbon emissions. That is more likely to be achieved by availability of better electric vehicles, capable of more distance without recharging, and with batteries that last longer. But these vehicles will require charging, and use of public charging stations will only be a minor factor in this; most will need to use overnight charging at home. And that means **a greater requirement for off-street parking at one’s residence!**



## Issue 5 – Lack of workable initiatives for the “Greener” goal

Whilst on the subject of zero-carbon emissions however, it seems that reduced off-street car-parks is the major “initiative” in the DPS aimed at the goal of “Greener” i.e. that “Wellington’s natural environment is protected, enhanced and integrated into the urban environment.”

Not only will it not work, but it will not compensate for the loss of “notable vegetation” (see page 20 of the “Khandallah Character Assessment prepared for WCC by Urban Perspectives Ltd in May 2016) caused by dramatic increase of higher density housing. Residents close to Mt Kaukua regularly see and hear many Tui, Kereru and even occasionally Kaka, Kakariki, Silvereyes, Ruru and Piwakawaka around their property. The native birds may roost elsewhere, like Mt Kaukau, but they feed on the trees and insects in or on properties now targeted for 4-6 story apartments.

**Brian McKenna**

[Redacted]  
Khandallah  
Wellington 6035

[Redacted]  
[Redacted]  
[Redacted]

**Christine McKenna**

[Redacted]  
Khandallah  
Wellington 6035

[Redacted]  
[Redacted]  
[Redacted]



---

**From:** Katie Underwood [Redacted]  
**Sent:** 05 October 2020 13:09  
**To:** BUS: Planning For Growth  
**Subject:** Planning for Growth: submission  
**Attachments:** Draft Spatial Plan October 2020.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Greetings

Please find attached my submission on the Spatial Plan.  
I am submitting as an individual and would like to be heard.

Can you please acknowledge receipt.

Kind regards

Catharine

Catharine Underwood  
Brooklyn  
[Redacted]

## Wellington Spatial Plan – Submission

I am making this submission as an individual

My name is [REDACTED] please ensure that this is the name this submission is registered under).

[REDACTED]

Brooklyn

Wellington

[REDACTED]

I would like to speak to my submission.

Thank you for the opportunity to provide feedback on the Wellington City Council Draft Spatial Plan.

1: Firstly, it is disappointing not have had a Brooklyn specific meeting on this subject. There were 15 areas identified and all 15 should have had their own consultation meeting with council staff/councillors. Setting up a meeting with the residents associations a week prior to the closing time for submissions is not engagement or consultation. It is lip service and too little too late. The council cannot honestly say it has consulted or completed engagement on the plan. It seemed that the council staff were more interested in meeting deadlines than actually thinking about what is the best/right thing to do. To claim that consultation is expensive or staff may have to deal with people being rude to them is not a sound basis for not consulting. Why wasn't there a brochure created and distributed with the rates notice. This would have gained the most engagement and provided every rate payer with the opportunity to comment. How were those who don't live in Wellington but own property engaged and consulted with? There is no way that the council can said to have consulted on the proposed spatial plan.

2: I have real concerns about the draft spatial plan. It mainly comes across as a re zoning exercise and about buildings rather than a cohesive plan. Spatial is defined as *relating to or occupying a space*. The only consideration of the use of space in the plan is buildings. There is no reference to much else in terms of the definite. Only examples of buildings and no examples of new parks, schools, sports grounds, pools to support the expected numbers of people. The spatial plan seems to be a 2 dimensional building plan dropped onto a 3 dimensional landscape. The consideration of topography is seriously lacking. Sun, Sun, Sun. We all need Sun and this plan does not seem to recognise that.

3: The numbers: The council expects the city to grow by 50,000 to 80,000 in the next 30 years. There is a big difference in these numbers – 30,000 - at least 3 big suburbs difference. There have been other numbers suggested that go as low as 18,000 – 30,000. Before such a drastic plan as proposed here, by the council, is approved, projected numbers that are more relevant, up to date and specific should be used. What is the impact on the projected population as a result of Covid-19. What are the statistics of the most recent census showing?

With the wide disparity in numbers would it not be better to incrementally increase the chosen areas as the requirement arose? Yes, agree that there may be more people coming to live in Wellington but with the proposed Adelaide Road growth area of some years ago it is possible that the demand may be met by this development area. Wouldn't it be better to see how that went and expand if the proposed council numbers did indeed come to be. Then look at another area that has been identified but not yet implemented. At present the spatial plan allows for massive buildings to be built when the demand may not eventuate. This has the potential to destroy the character of any area and change not necessarily for good. I oppose any rezoning of the CBD to include up to the intersection of John St/Adelaide Road.

4: What is the make up of this 50,000 to 80,000 projection. There is no mention of more families, single people, gold card holders, couples, students, upsizers, downsizers. How will the council ensure that there are the right kind of 'houses' for a population they don't know is coming? What assurance is there that there will be amenities for families, retirees, workers, students? Again, the focus is on pure numbers rather than the type of people that may want to come. Will there be apartment blocks where people can move within the same building as their circumstances change – move into a bigger place when the family grows or a smaller place when families don't require as much space. Will there be balconies to sit in the sun, grow food, just get outside. I note that very few of the new builds in the city or the suburbs have balconies or decks. Where is the connection to nature? Recent studies during covid showed that people need nature and it is an important part of our mental wellbeing. Having a small deck or balcony means getting outside into the sun or growing a few veges or just sitting. Sun, sun, sun – it's all about sun.

Furthermore, the distribution of the councils projected increase is not fairly spread across suburbs with some like Johnsonville getting laden with a huge increase in buildings, intensification and people. Seatoun, Wadestown and Wilton aren't even mentioned. All three suburbs have regular public transport opportunities. Seatoun has an 'old' village, as Strathmore is described by the spatial plan and the Seatoun village is not too dissimilar to Strathmore so why isn't Seatoun subject to the same changes as other suburbs. Wilton and Wadestown are walking and cycling distance to the city so it makes sense to increase the density in these suburbs. All three suburbs could easily sustain higher buildings and a denser population. Even Kington, a quiet peaceful suburb, has a small area identified for much higher buildings than the surrounding area. One has to ask why aren't Wilton, Wadestown and Seatoun included in the spatial plan. I'm sure people would love to live by the beach in Seatoun or with the green outlook in Wadestown and Wilton. This is a bias plan and seems a strong case of NIMBY.

5: Wellington is one of the few, if not the only city in New Zealand, that has had an increase in indigenous biodiversity. There isn't enough in the spatial plan to convince me that the council has thought about this or included the need for 'nature' in the plan. The focus needs to be on the total end result - not just buildings. Of concern is the comment 'if there is a tree in the way, we will plant another somewhere else.' This is tragic on so many levels: Lets live with nature and design around it, there could be detrimental effect to territorial species using that tree with the cutting of it; there is no mention in the plan of where the replacement tree would be planted. The plan says it has links to other plans but does not include them as a right. The plan also talks about good design – good design involves working with what you have so design around the tree. Some of those trees are still young by tree standards and deserve to be left. It is despicable that the council is even considering cutting down trees.

The spatial plan should outline how the council will retain and increase biodiversity in conjunction with the buildings. The plan outlines the height of buildings allowed but it doesn't stipulate how many trees/parks are needed per new dwelling per 5,000 new residents. There should be as much detail for this as there is for buildings. There is vague mention of street scapes but that's it – vague.

A review of trees in Wellington is needed before they are all cut down. There needs to be more trees protected than there currently are. There needs to be more protection of native/endemic trees. At present around half the protected/heritage trees are exotic like oaks Norfolk pines and Plan trees. Much more respect is needed for the trees of New Zealand which can take 400 years to reach maturity. The plan plays lip service. At present there is a single bullet point.

6: Before this plan becomes anything permanent, a complete review of existing and potential new view shafts (to use council jargon) needs to be completed. Are the controls strong enough to protect existing view shafts and to create new ones. There are a few around Wellington already that are protected i.e. from the Cable Car in Kelburn. In my view, this plan will destroy anything that isn't

already protected. Something of an intrinsic nature in Wellington is the view of houses nestled on steep slopes of the surrounding hills, the glimpse of Mt Victoria, or the town belt or the harbour as you navigate your way around the city. These views need to be protected.

There is a lovely 'view shaft' which has just been obliterated with show cases precisely what I mean: Coming down Aro Street, there was a lovely shot of Mt Victoria in the distance between the houses. Coming along Karo Drive after exiting from the Arras tunnel there was a nice framed view of the bush clad hills and houses in Kelburn south of the university. These views have both been blocked by the new complex Sunset West. There is no longer a view at all. A massive 8 storey building completely blocks the view and stops the eyes seeing to the distance. A building to 5 stories would have been ok and kept this view shaft. This building has also probably stopped any future plans for undergrounding Karo Drive. One of the sad things was the building of the New World blocking the view of the harbour/hills from Cambridge Terrace. Can we not learn from this and protect important views now.

Furthermore the views from the suburbs towards landmarks should be considered. Sightlines to the Carrillion, Government House, Mount Victoria, Mount Cook, Tinakori Hill, St Gerard's Monastery are important. The views of these sites give a sense of place and uniqueness – when you see these you know you are in Wellington. Many of the proposals will denigrate the sightlines and views from around the city.

The views of the surrounding suburbs from the city will also be at risk. Looking across at the character houses on Mt Victoria or Mount Cook will be lost. The view of the Newland hills coming down Thompson Street will be lost. These views are what makes Wellington a great place to live. The unexpected glimpses of the rest of the city. The proposal will block the distant perception and one will only see buildings.

A city wide review of view shafts, with public consultation, needs to be completed and more 'view shafts' protected prior to the introduction of the draft spatial plan. Protect what we have before it is lost.

7: Amenities. The council is expecting 50,000 to 80,000 new residents in Wellington. Where are these people coming from? There is a 30,000 difference between those numbers which is quite a margin of error. What sort of people will they be. What sort of plan does the council have to ensure that there will be the amenities to suit. If it is families, what sort recreational amenities will there be – parks, play areas, playgrounds in schools and schools themselves. Already the city schools are building classrooms on playgrounds and playing fields i.e. Mt Cook School and Brooklyn School. What about the transitory nature of students living in Wellington for 3-4 years compared to those who live in central wellington – how is the council addressing the needs of long term committed residents compared with short term, transitory residents. These groups have different needs when living in the city – how will this be addressed. The plan is very light on any detail other than buildings.

8: It is apparent from everything that is going on in the city that the council has an anti car policy – anything that involves removing car parks or makes parking pricier gets the green light regardless. With apartment buildings not required to have car parks, where are those with mobility issues going to park/live. It isn't reasonable to expect someone in a wheel chair to wait at a bus stop in the rain, transfer to a taxi in the rain when the curb isn't suitable and the driver isn't aware of how to provide a good service, is not making Wellington an accessible city. Not everyone can use public transport or ride a bike but many that can't can still drive. I raise this as I have friends/family in exactly this situation. The same as a building needing two lifts to be suitable for wheelchair users. Here is an excerpt from the councils own website:

*Given the City's topography, constrained roads and access in places, improving accessibility and the consequent amenity values within Residential Area is an important issue. This is a particularly important issue for people with mobility restrictions and for the City's increasing population of older people. The Council will actively seek to improve the proportion of all housing in the City that is, or can be made, accessible and usable, by older people and all others with mobility*

How does this work within the framework of not having car parks. Has the council gone back to the government and made a case against the requirement of not needing car parks in new builds? What has the council done to back up its claim in the above paragraph? Why is it only residential that gets this benefit? Surely the mark of a community is all types of people and cultures and beliefs. Surely there is a case for the council to talk to the government about variations to the rules and special circumstances.

9: Who is the arbiter of good design. The councils design guidelines (as quoted during the consent process for Brooklyn Rise) don't seem to have any teeth. Good design involves working with what you have. The examples of good design in the brochure are Auckland examples. Is the council saying that in Wellington, there are no examples of good design that could have been used? This is of real concern. I am concerned that the plan is to 'replant elsewhere' if there is a tree in the way. Good design would include the tree in the new building. How will the council ensure that 'good design' is implemented? Will there be rules, minimum standards, photos of what is wanted/required? What does it even mean – good design?

10: The amenity planting plan needs to be revisited to ensure 95% of amenity plants are native. I can see a huge loss of greenery with this plan so the council needs to be very clear about what they expect from developers. Recent studies have shown that being able to see/experience 'nature' is important to health especially mental health. There needs to be a specific greening plan as part of this whole spatial plan - not as an add on when the buildings have been built. So many of the amenity plants in Wellington are exotic. We need to be proud of our plants and put them in the streets.

11: What is the ratio of new parks/play areas to new buildings? There should be a minimum stipulated area set aside for each new building/new resident. Every time multi-unit building is built there needs to be a corresponding park of at least 60sqm allocated, for example. There needs to be loads of pocket parks that get sun and which are accessible.

12: Wellington is windy. The proposed minimum height levels in the central city will turn it into a city Stepford Wives environment – sterile and lacking interest. Wellington's buildings are all different sizes, shapes, colours and heights. This is what makes it fascinating, which challenges the eyes and is interesting. The proposed minimum height will make Wellington a boring sunless wind tunnel. The wind exceeded the allowable level with the proposed PWC building on the waterfront but the building was still allowed to proceed. This is dangerous on a bicycle and walking. Victoria Street is pretty unpleasant to cycle up and shortly will also be a shady wind tunnel like being at the bottom of a canyon

The canyon effect can be mitigated by having a mandatory set back once above the third/fourth floor. The Kirkcaldie and Stains building in Lambton Quay is a perfect example of this. The original building was kept, the new building set atop while preserving the look of the building, creating 'space' in the street and is an example of good design. Jut along the street, the HKSB building is an example where the council didn't have the teeth to ensure the extra floors were set back from the heritage levels. There is a nasty modern addition atop the original building/heritage façade and no set back, ugly and helps create that windy canyon feel.

13: How is the council going to minimise the increase in light pollution with all the new lights. There needs to be a review of how Wellington can work towards being a dark sky area and a capital city. This is entirely possible if the council has the will for it. I'd love to see all new buildings have 'Tekapo' style lighting. Just because it is an LED doesn't mean it is the right LED. There are so many softer LEDs that could be used which give light but don't pollute.

14: Character areas. I am appalled that the council is considering the removal of character areas and making them 'sub character' areas. When does an old building get so old it is no longer judged to be character? Who is the council to decide this? Mount Victoria is fantastic just the way it is. The proposed spatial plan completely destroys any character that currently exists. Do not reclassify any of the character areas in Newtown, Mt Vic or Mt Cook. In fact more suburbs, like Brooklyn, for example need some, character classification not less. There is no guarantee that the projected numbers will eventuate to let's not destroy what is good about Wellington for a possibility. I oppose any removal of any heritage or character classifications from any of the suburbs mentioned above.

15: This is time to create a great plan. To get this wrong will be so bad on so many levels. It is a chance to really think about climate change, nature, living spaces, accessibility and getting around. Where is the really way out thinking of the council. My feeling is that it is a tick box exercise and keeping to the timeframe is far more important than making a good plan.



Where are the green roofs on buildings? The green walls? Where is the requirement for solar power communities? Where is the blue sky thinking? Where is the thinking outside the square and being courageous with design? Where is the requirement for city parks and other amenities? It's all about buildings, buildings and more buildings. What about the conversion of office blocks to apartments now that so many people can and do work from home? This is not a well thought out plan and needs to be seriously reworked to consider more than just where can we put new buildings.



# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: **16107**

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Charles Crighton

**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?**

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?**

This question is not neutral. There are clearly ways of accommodating additional growth without destroying the character and quality of life of inner city suburbs such as Mount Victoria and Kelburn.

The statistical analysis underpinning the plan is erroneous and numbers used are unrealistic. 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.

Clearly, this is not a democratic plan that reflects the views or needs of Wellingtonians. This is a plan that puts the profits of land bankers and owners of run down, sub-standard rental properties ahead of normal Wellingtonians.

**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?**

Stafford Street, Earls Terrace and Port Street are zoned "Type 3" in the proposed plan. These streets are completely unsuitable to the addition of anything but "Type 1" due to the geography and road access. Stafford St already has problematic access because Port St is so steep and there is very little space to meet existing residents needs for parking and access.

Stafford Street, Earls Terrace and Port Street or all cul-de-sacs. These cul-de-sacs create safe streets for families. Our children are safe to play, ride bikes, use chalk to draw murals on the road, and walk to the other houses to visit their friends. We can safely hold a street BBQ each year. The proposed plan would destroy this space for the residents as the amount of car traffic on the streets would grow dramatically by increasing the number of residents by several factors. It will destroy what we have: a safe, community oriented space.

Stafford St is on the ridge line and visible across the city and from all parts of Mount Victoria, the additional of even three story buildings would ruin the skyline for all of Wellington.

The original planners of Mount Victoria did not visit the space, it appears that the new planners have also not visited the current Mount Victoria to understand the constraints imposed by geography and the current unchangeable aspects of the design of the suburb such as the poor road access of many parts.

The use of the term "character areas" is completely misleading. Only sub-character areas get any meaningful protection while the character areas get close to none.

In Mount Victoria the sub-character area is an extremely limited view of the historical nature and character of Mount Victoria. To ensure Mount Victoria does not become a concrete jungle over 30 years, all of Mount Victoria including all areas including and west of Hawker Street and Austin Street must retain the existing rules. This

includes areas such as Earls Terrace, Stafford St, and upper Majoribanks St that are clearly visible from Te Papa and the Wellington Waterfront.

Any building of structure, higher than currently allowed, west of Hawker and Austin St will be up to 70 metres above sea level, ruining the view of the town belt from the city by creating the appearance of a new set of high rise buildings like the CBD but in a Mount Victoria.

**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), Access to cycleways/routes, Walkability within the centre

**Other:** One of the goals of the plan is to create a compact city. There is no need to include facilities that can easily be centralised in the city such as social services, commercial, and medical facilities. Distributing such facilities is common in Auckland be

**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.), Bicycle parking

**Other:** This question is poorly phrased. How can these two mass transit stops have the same needs: Wellington Railway Station or Elisabeth St adjacent to Clyde Quay School?

**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?**

Access to the town belt and open spaces was essential, especially during the Level 4 lockdown.

The necessity of community support during this time became even more obvious and valuable. The proposal for Stafford St, Earls Terrace and Port Street would destroy that special community by ruining the safe shared space we have on the streets.

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

A rational plan is missing that takes into account the needs of owner/occupier and tenant Wellingtonians, and the constraints of the existing urban design and geography.

**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?**

The plan for Mount Victoria is very poor and must be changed. It only provides limited protection for a small part of Mount Victoria around upper Hawker Street.

- 3.
4. Stafford Street, Port Street and Earls Terrace cannot support anything more than existing or "type 1" density because:
5. - These streets are cul-de-sacs with poor road access
6. - They are visible from the Wellington waterfront and Te Papa so the proposed 4 story apartment blocks will ruin the famous view of Mount Victoria from Wellington. Only existing or Type 1 density is consistent with keeping the famous Wellington sky line.
7. - The properties on these streets are small so large buildings will very adversely effect all nearby properties: blocking sunlight, ruining views, creating unsafe streets for residents especially children, destroying the well established neighbourhood community.
8. - Construction work on these streets is extremely disruptive due to poor access. Even current building work has caused years of disruption to current residents. The proposed plan will create potentially a decade or more of disruption to existing residents completely unnecessarily.
- 9.
10. There is no need for any change to Mount Victoria when so many existing options within existing rules to achieve reasonable goals for growth in the city. For Stafford Street, Port Street and Earls Terrace the rules are even worse as outlined above.
- 11.
- 12.

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

The proposed plan uses inflated numbers and ignores obvious future societal changes such as the move to working remotely.

- 14.
15. With so many sub-standard and earthquake prone buildings that need replacement in Wellington, there is a huge existing potential within existing rules to address growth.
- 16.
17. Encouraging and providing incentives for intensification within existing rules makes sense. In our case we added another housing unit within the existing building envelope. Large numbers of properties in Mount Victoria can be intensified without new rules by extending within existing limits.

**18. 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).**

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?**

**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?**

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?**

Weed and pest control

**Other:** This question is poorly phrased. How can these two mass transit stops have the same needs: Wellington Railway Station or Elisabeth St adjacent to Clyde Quay School?

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

The proposed plan has been advertised as a positive change for Wellington. Unfortunately, it is full of poorly thought out changes that are ignorant of local constraints, existing character and communities.

**Have you provided an attachment?**

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: **16013**

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Chris Watson

**Suburb:** Wellington Central

## 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?**

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?**

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

Access to public transport, Commercial activity (retail, cafes, local businesses), Medical facilities/centres, Access to cycleways/routes, 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?**

Te Aro was a beautiful place during the lockdown because there was little motor vehicle traffic.

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

Bicycle tracks safe enough for children, grandparents and everyone else

### **Non-Compulsory Questions**

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

It allows more people to live where they need to be ie CBD.

2.

**3. More people would make the city more interesting and enjoyable.**

**4. What would you change or improve?**

remove any council restriction on development of pre 1930 areas.

5. They are exactly where the population needs to be - near CBD employment and services.

**6. Owners of houses in Mt Vic and Thordon should free to develop properties to meet their requirements in the 21 and 22 century.**

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

Reduce motor vehicle traffic by whatever means necessary. Traffic renders much of the city unpleasant, which is why people take refuge in Cuba Street and on the waterfront.

8.

**9. Prepare a plan to combat the worsening traffic from the NZTA project in transmission gully.**

**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.**

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.**

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.**

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.**

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 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**

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?**

**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?**

**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: **14726**

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Derek Williams

**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?**

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?**

Neutral

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

Taking a city wide approach is fine, but the devil is in the detail. The devil is also in the extent to which street character can be preserved. In some areas of Thorndon new developments have been sensitive and such developments can be welcome. Other developments have awful design e.g mansard roofs that are totally out of character, block looking structures that are again out of character. The plan does not specify exactly how design control will be achieved and past performance gives no confidence in the future.

**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?**

Low rise housing of varied but compatible design. Four, six and eight storey blocks have no place in the character suburbs.

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

Proximity to parks and open space, Public/shared spaces, Commercial activity (retail, cafes, local businesses), Medical facilities/centres, Walkability within the centre

**Other:**

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

Public shared spaces, Landscaped spaces/plantings, 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.**

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 network of pathways within Thorndon, including the Botanical Gardens and side streets. The Quayside and the Cable Car in the central area.

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

Seating along the street pathways in Thorndon.

### **Non-Compulsory Questions**

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

In general the plan is a good basis for future development.

**2. What would you change or improve?**

The plan needs to be far more nuanced. E.g. The top of Hill Street would be fine for medium density housing, but is not the place for commercial or office uses. On the other hand Hawkestone Street is already compromised and can accommodate offices and commercial uses.

**3.** In an earthquake prone city one major vehicle link (the motorway) through the city is plain daft. The quays should be regarded as a vehicle through route as well.

**4.** Light rail does not provide access to the airport. No one is going to carry heavy luggage up to a kilometre to get on a tram. It may serve as a commuter service from the suburbs it crosses to the central area. But an improved bus service would be a much more flexible option (but don't leave it to the Regional Council to organise).

5. The Government precinct, including the Cathedrals, National Library, Old St Paul's etc deserve some protection from overpowering office/commercial blocks. protection from

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

Provision of adequate car parking. No matter how much the Council may wish cars away, they are here for another 20 or 30 years and need to be provided for in a controlled way.

**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.**

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.**

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.**

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.**

Strongly 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.**

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).**

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**

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?**

?

**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?**

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.**

The concept of community developed plans for each suburb should be pursued not just for Miriamar.

**Have you provided an attachment?** No

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## Online submission form ID 15164

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Organisation Name:** Wilton Residents' Society

### 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?**

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?**

Concentrating tall buildings in small areas is not as attractive as dispersing them among existing houses as on Mt Victoria (Majoribanks St. etc), Hobson Street, Tinakori Road etc. Herbert Gardens built in a row on The Terrace would be awful. There are scattered derelict houses on very suitable sections such as Warwick St./Wilton Road through all suburbs so should be considered. The very last thing we need are "estates" of tenement blocks as in the U.K. Design to the visual environment and attractiveness of the buildings is also paramount - as in Oriental Bay/Roseneath. If virgin green areas are developed then the blocks must be "dispersed" as with current good retirement complexes with vegetable and flower gardens, small parks, kids' playgrounds, treed walkways between blocks etc. Good design to environmental topography and attractiveness of the blocks themselves is paramount.

**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?**

That concentrations of "slum blocks" do not invade. Some historical houses such as The Mansfield House in Hobson St. and Tinakori Road must be preserved as well as others of significant design, including early C19th (and C18th?). Erecting blocks against hills, as in Tinakori Road or Glenfield Street, would allow character buildings to remain unaffected. (The Bowen Street heritage cottages should remain protected.) Small parks could be created on some sections when cleared of derelict houses or even some small streets like Mary Street be only pedestrian and developed like Fitzherbert Garden off Hobson Street. Very central apartments are already very popular so creating more, perhaps as upper stories on commercial buildings, which will also be needed, might be practical, especially in Oriental Bay where some businesses operate in very ordinary buildings. Kaiwharawhara might allow for several spaced out blocks (if station re-opened). Are areas going to be zoned as high rise and properties taken by the Council? If so individual sites such as houses on the high left side of Oran Street, for example, could accommodate ten storeys and barely be seen from street level. Over a period of 30 years it must be possible to acquire sites scattered right through Wellington and retain houses or buildings of merit

**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, Employment opportunities, Infrastructure (stormwater, water supply, wastewater), Medical facilities/centres

**Other:** schools and preschools, fibre and cell networks, trees, fruit trees, building rules that houses must recycle grey water (to wash cars, water gardens, hose/clean houses etc.) and also have tanks for storing rain water.

**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:** Make them pedestrian friendly -not like Kilbernie where it is a dreadful long walk in strong wind and torrential rain with heavy shopping across roads designed only for car (bus) use and no zebra crossing from/to bus stop itself. Extremely hard on crutches!!!

**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?**

No facilities in Wilton. Remained in my home with lots of excellent books, internet, phone, "bubble" friends and cat. In recovery from spinal operation (thanks to surgeon fighting for me and having it done in private hospital.)

No impact on me. Shopped in advance then about every two weeks. Virus not in Wellington so only over-imposed restrictions (e.g. no Miha) affected me.

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

Proper phone contact with Wellington Hospital and blood labs. (Had to enlist help of police to access essential pre-op. blood tests.)

Apart from toilets in the CBD and Newtown (a problem) I use no facilities or amenities, other than paying Rates to WCC. Library now not accessible due to distance from bus stops.

**Non-Compulsory Questions**

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

The Council is putting a lot of effort into future planning and also involving residents, many of whom I consider to

be very critical aggressive towards the Council and hope this doesn't impact too much. My only criticism is that multi-storey housing not be too clumped together in one place in the various areas designated on the plan.

2. I like the full consideration given to parks, open spaces, public transport, cycling and walking and recognition of the importance of business as well as community needs. It is also very satisfying being able to make this submission and I hope my comments may be "taken on board" regarding my one concern that no ghettos be created.

3.

4. With thanks.

**5. What would you change or improve?**

No putting too many high rises clumped together and better access for pedestrians at transport hubs.

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

Water supply from rain - will there be enough? Houses need to re-use grey water \_e.g a small hand basin by the toilet can send used water to the cistern. Tanks are needed for garden, cleaning car and house - and a possible source to extinguish fire. The sub-basements of high rise building could be water tanks fed by rain water and perhaps in halves so one could store grey water from washing machines, and showers.

7. Over 30 years hopefully we could afford light rail "all over the place", and Wellington Station extended by a higher level as far as the Stadium to allow more lines for the extra train needed . I don't know if higher numbers of passengers can be carried simple by bigger/longer trains but quadruple tracks to/form Kapiti and Hutt does not seem feasible to me. Maybe it will be "drone-carriers" by then!

8.

9. The Council needs to generate \$millions -more Arts Festivals. WOW's, motor sports, tattoos, beer and wine fests, proper Art Gallery, a venue for sales/auctions of private household items rather than on TradeMe, a Children's Day, a January New Year and Matarike but not as "New Year" as is well after the 21st June which is the equinox, Ballet, Opera, dance and music, International New Years, festivals, food halls and markets, support of Fine Arts Academy ( I was an art dealer in the '90's and met a Californian lady there who had come to Wellington to see the art because it was so good; have another actual museum along the wharf (not a kids' playground like Te Papa) to compliment the Maritime Museum.

10. .

**11. 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.**

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.**

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.**

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?**

Protection of the skyline and walkway and retaining much of the current vegetation although natives could be encouraged to replace the pines. NO EUCLID gouging of the land and total destruction of surface soil or it all pouring down the hillside into the harbour or Miramar streets. Each section must be cleared and prepared individually and not left open to the elements for weeks or months. No high rises in clumps or where they could shade or impact on other dwellings and Shelly Bay remaining as a park/ cafe's with high rise against the hill at the back. Removal or "museuming" of old Wellington Prison and development of

tourist attractions ,big "field " glasses, seating , cafe, wool shop, arts and crafts /Maori shop, etc. Good walking network including to Massey Memorial which should be a very strong feature. All housing should be designed to the topography.

"

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

Children's play and free areas and better access to transport.

**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?**

**Other:** Being able to gift significant areas of pre-European native bush into existing reserves.

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

Just to repeat that care be taken not to clump too many tall buildings together and create ghettos. Enforce water storage and recycling. Allow for public transport and facilities for children everywhere .

**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

## A City for the People submission ID 167

This submission was originally received through the A City for the People website:

<https://www.cityforpeople.org.nz/take-action>

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Name:** Eleanor West

### I support the following statements:

I strongly agree with proposals to intensify the Central City, Inner Suburbs and Outer Suburbs to allow for compact, livable, low-carbon urban form.

I support council taking action to ensure everyone in Wellington can live in safe, warm, affordable housing that provide for a diverse range of housing needs.

I strongly encourage the council to partner with iwi and mana whenua, to ensure their aspirations are met, and the current decision making process while we plan for growth is decolonised

I strongly support the council meaningfully engaging with disabled people to ensure decisions about Wellington's growth and development provide for a truly accessible city

I support reducing the size of the character areas to focus on well-preserved sections while allowing homes in poor condition to be redeveloped

I believe that natural heritage and the heritage of mana whenua are important and should be celebrated, protected and enhanced.

I support focusing development along future mass rapid transit routes and agree that strong amenity value must be developed alongside

I support the establishment of safe and easy to use active transport routes alongside areas of development

I support the council developing a plan to make sure everyone will have access to high quality green space and public space

I support requiring new developments to manage stormwater through water-sensitive design

The council should pause plans to develop unsustainable communities in green-field sites in Upper Stebbings Valley & Lincolnshire Farm and instead focus on enabling density closer to the city

I strongly support council meaningfully engaging with marginalised communities to ensure they are heard and have input into the ongoing development of the Spatial Plan and related policies

I strongly agree with taking a city-wide approach to distributing density

**What excites you most about having a more compact and liveable Wellington?**

# **Our City Tomorrow: A Draft Spatial Plan for Wellington City**



**From:** Grace Carr - Campaigns <campaigns@vuwsa.org.nz>  
**Sent:** 05 October 2020 17:59  
**To:** BUS: Planning For Growth  
**Subject:** VUWSA's submission on the Draft Spatial Plan  
**Attachments:** VUWSA's Submission to WCC's Draft Spatial Plan.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Kia ora,

My name is Grace and I am emailing you Victoria University of Wellington Students' Association (VUWSA) submission on the Draft Spatial Plan. We appreciate you taking the time to read our submission. As one of the key stakeholders in the city who is greatly affected by this plan, we hope you take our feedback, efforts, lived experiences, and suggestions into account.

Additionally, we request to make an oral submission.

If you have any comments or questions please do not hesitate to get in touch. Apologies that it is late, we were facing some technical difficulties.

Ngā mihi,  
Grace Carr  
Campaigns Officer  
VUWSA



**Submission**  
by the  
**Victoria University of Wellington**  
**Students' Association**  
on the  
**WCC Draft Spatial Plan**

Prepared by

**Grace Carr**

**Joanna Li**

Victoria University of Wellington Students' Association (VUWSA)  
Level 4, Student Union Building, Kelburn Parade

**VUWSA also wishes to make an oral submission.**

Contact

**Grace Carr**

Campaigns Officer

[campaigns@vuwsa.org.nz](mailto:campaigns@vuwsa.org.nz)

|         |  |
|---------|--|
| To      | <b>Wellington City Council</b>   |
| From    | <b>Victoria University of Wellington Students' Association (VUWSA)</b> |
| Date    | <b>5 October 2020</b>  |
| Subject | <b>Planning for Growth Draft Spatial Plan</b>                          |

- 1. Introduction**
- 2. The current state of housing for students**
- 3. Our demands (Further Areas of Development)**
- 4. On character protections**
- 5. Amenities**
- 6. Design Principles**
- 7. Further Comments**
- 8. Consultation with our Communities**
- 9. Council's Consultation**
- 10. Conclusion**

## **1. Introduction:**

Victoria University of Wellington Students' Association (VUWSA) advocate for and represent the 22,000 students of Te Herenga Waka— Victoria University of Wellington. Students, and under 35-year olds, comprise a large portion of the Wellington Central population. The way students think about housing and urban planning is substantially different to the general population, and represents the unique way students experience Wellington. Anxiety around flat availability and cost, the efficiency and convenience of public transport, and access to green spaces are all everyday issues for students. To address these areas through urban planning is essential for maintaining a thriving and sustainable city.

We are pleased that Wellington City Council (WCC) are consulting with the public on their Draft Spatial Plan for housing in Wellington and considering the long-term future for Wellington City.

VUWSA strongly supports the Draft Spatial Plan, granted this addresses the concerns expressed by students and young professionals. Any reform would have strong impacts on wellbeing, and should be centred around the principles of safety, affordability, accessibility and climate resilience. The reform of housing in Wellington would affect both the academic and social experience of students - with many having their first experience living independently or away from home.

Wellington is a youthful city, filled with students, young professionals, and artists. Students from across New Zealand choose to come to Wellington to continue study and seek new opportunities. By creating a city which acts as a functional space where students can live and work in, VUWSA believes these changes will contribute to student retention after graduation. Additionally, reviewing the Draft Spatial Plan through a student lens, and prioritising the experiences of students, will enrich and benefit the lives of all, while offering a forward-thinking perspective.

Given Wellington's immense projected growth in population, it is critical that the Council ensures the city has the correct infrastructure and planning to protect the welfare of these

new citizens. Failure to do so is both irresponsible and disappointing. This means ensuring access to affordable accommodation, allowing citizens to keep both safe and warm without having to compromise on going without groceries or internet.

This submission outlines the current state of student housing, and in doing so highlights the importance of reform to housing in Wellington. We also point out areas where we believe the Spatial Plan does not go far enough, and the principles we wish the WCC to be keeping in mind when finalising the plan. In writing this submission, we gathered responses and testimonies from our community of their experience with housing in Wellington.

## **2. The current state of housing for students**

Housing is currently inaccessible for students. Rent has risen from under \$200/week, to roughly \$240/week over the last two years. A large majority of these flats are cold and damp, leading to higher electricity bills, increased likelihood of sickness, and mould-ridden rooms. In addition, there is not enough supply for the high demand.

Flat hunting is incredibly stressful and poor housing conditions often cause mental and physical suffering for students. Students are often forced further into outer suburbs in order to find accommodation that within budget and does not compromise their health. This shift from the inner city has huge impact on the diversity of the city, which in turn, affects its culture. It also means that students become even more time-poor, due to longer commutes to and from the city.

Additionally, many students rely on part-time jobs to supplement the current student living cost allowance from the Government to afford rent and other living costs. Full-time study already accounts for 40 hours a week. Failure to keep rent in the central city affordable not only negatively affects student wellbeing, but also their quality of study and often means forgoing other interests, such as recreational activities and socialising.

### **3. Further areas of Development**

VUWSA supports this plan as we believe it will create a more equitable society for students and ensure that their wellbeing is prioritised. We support the proposals for denser housing for the reasons further detailed in this submission.

We also believe that the plan is missing key areas of development which would be beneficial to students. This includes:

- Further upzoning of Kelburn, a student area. However, we do not want Kelburn to be prioritised as an area to upzone at the expense of areas with better transit. This principle also applies to Northland.
- More emphasis on residential housing, instead of mixed-use development.
- In cases where there are mixed-used dwellings, the upper levels must have accessibility access options.

#### 4. On the character protections

We believe that the current spatial plan encompasses the right amount of character and heritage protection whilst also allowing for more development. All heritage will continue to be protected and so will some key character homes. Whilst some character homes will be demolished, this is a tradeoff we should be prepared to make given it will create opportunity for building more medium to high density housing.

Heritage and character homes are a want, not a need. What students and Wellington need are more better-quality housing. These character homes, which are often older dwellings and unsafe to live in, are mostly occupied by students. The mass expense of upgrading these homes is passed onto these student renters, further exacerbating the financial struggle of many studying in Wellington. In truth, we consider the only character these homes add to the city is to the dominant portrayal of flatting in Wellington being a cold, damp, mouldy, draughty and miserable experience.

Wellington is a city defined by its individuality, shaped by its people, musicality, food and art scene, and cultural spaces such as its museums, memorials and city spaces. It is this incredible culture that helps make Wellington the 'coolest little capital', drawing people from all over the world to it. At no point are Wellington's cold and damp character homes a part of Wellington's cultural draw. Rather, it is the people, its students, artists and creators, which make the culture. These people cannot contribute to the culture of the city if they are too occupied trying to make ends meet with rent and food every week.

Given this, we see the current provisions around character housing as being at an adequate level. However, the impact of further prioritisation of character housing will be felt by students. It will maintain the status quo of poor-quality, expensive housing, in low supply. Young people are already alienated from the city due to its high living cost. We want a diverse city that is accessible to all, not just those with wealth. This spatial plan is an incredible opportunity to make the changes Wellington needs right now. For the sake of young people's mental health, physical health, and financial accessibility, we implore you to support the spatial plan with the current provisions around character overlays. The desperate needs of students far outweigh the wish for unnecessary character overlays.



## 5. Amenities

### 5.1 Green spaces

We support creating more green spaces in Wellington. Green spaces are incredibly important for mental health, recreational purposes, and community. When these green spaces are created, they need to:

- Prioritise indigenous biodiversity
- Be accessible – such as being wheel friendly and free
- Have adequate safety measures to protect the community – such as lighting
- Have some green spaces that are suited to the Wellington weather and can be utilised no matter the season

### 5.2 Public Transport

We believe there should be a greater focus on public transport in the Spatial Plan. City planning and public transport planning are interconnected and must be viewed holistically to achieve better city design. We support the efforts of *Let's Get Wellington Moving*. You cannot build or plan for residences without considering how those homes interact with public transport. People rely on public transport to move around the city to access work, education, recreation, and supermarkets, to and from their home. We believe public transport should be:

- Free
- Safe (such as provision of adequate lighting around bus stops)
- Frequent, and around the clock
- Accessible
- Prioritised

### 5.3 Community spaces

We believe that there is not enough in the spatial plan to provide for community spaces. Community spaces are essential for mental health, recreation, and creating a sense of community. We would like to see more:

- Provisions for community centres (such as Aro Valley Community Centre)
- Community gardens
- Community composting
- Provisions for communal housing
- Provisions for communal living (such as laundromats)

### 5.4 Infrastructure

The predicted city growth will lead to increased demand and pressure on infrastructure, which is already struggling to provide for our current population. We believe greater attention needs to be paid to the maintenance, growth, and upgrades of Wellingtons infrastructure. Listed below is the infrastructure we believe needs to be improved and/or expanded upon:

- Waste
  - Both collection and landfills- greater education provided around collection is needed and our landfills need to be able to sustain waste locally as opposed to exporting waste
  - More bins (including recycling and composting) around the city
  - Better education and resources around waste in Wellington
- Water
- Electricity
- Lighting
  - There needs to be better lighting around the city, including stairwells. This will improve city safety and accessibility.
- Crossings

- Our crossings do not adequately support people with disabilities. They need to be upgraded and looked after to provide sounds and lights. Failure to do so creates a city that is not safe, walkable, or accessible.
- Pathways
  - Provisions must be put in place to create safe pathways that do not abruptly come to a stop, are uneven, and have e-scooters across them.
- Cycle ways
- Water fountains
- Public toilets

## 6. Design Principles

### 6.1 Sexual harm prevention

Design of public spaces should be created so that they remove opportunities for sexual harm to occur. Natural and built environment should both prioritise this. Te Aro Park, between Dixon and Manners St, is an example of poor design creating potentially unsafe situations. The roads, and the positioning of the public toilets mean that there is poor lighting, and certain areas act as chokepoints, where it is easy to corner someone. The current water features and stairs mean that it is difficult to move quickly across the open space. It is critical to mitigate, or at bare minimum, discourage such situations through design of public spaces.

### 6.2 Universal accessibility

VUWSA believes that access issues and disabilities should not be a barrier to experiencing Wellington. Therefore, it is important that the Spatial Plan should consider universal accessibility as a key principle. This includes accessible green spaces, accessible pathways which prioritise pavement safety, adequate signage (including Braille), and accessible public transport. It also means that in multistory buildings, lifts should be a compulsory feature.

### 6.3 Sustainability

Young people are anxious about climate change. We know that it will be a burden we will have to shoulder as we graduate, and begin working. This is particularly more pertinent in Wellington, where we are prone to rising sea levels and earthquakes. We believe that it is important to build infrastructure that plans for the long-term, and ensures that we prioritise the environment, the preservation of our native flora and fauna, and reducing our carbon emissions.

#### 6.4 Inclusive Community building

We want the design of Wellington City to encourage community building as a place where people can come together. COVID-19 has shown us that there is a persistent need for us to all be connected to one another, so we can rely on our neighbours in times of crisis. The way the city is designed and built should encourage this. Wellington is home to a diverse community, and each year international students come to VUW and enrich that diversity. We want Wellington to be a welcoming home to the international and domestic students who move to Wellington to study at VUW.

#### 6.5 Pluralistic housing options

We want a range of housing types to support diverse living arrangements including flatting, homes for both small and extended families, communal living and smaller apartment-style living. We need a full range of options to support our diverse and transitory student community. We would like to see the special plan encourage a wide range of housing types.

## 7. Further comments

VUWSA has compiled these comments from groups we have worked with to discuss the student perspective to the Draft Spatial Plan. They may also be making their own submissions independently.



### 7.1 Disabled Students Association

The Disabled Students Association is the representative group for disabled students at Victoria University. We seek to ensure that the large population of students with disabilities - including physical disabilities, learning disabilities, mental health conditions, chronic illness, etc. - have an equitable and enjoyable University experience. We are particularly concerned with the lack of accessible housing and transport in Wellington, and hope to see meaningful change in this area.



### 7.2 UniQ Victoria

UniQ Victoria is the Queer Students' Association of Te Herenga Waka—Victoria University of Wellington, and we support this submission by VUWSA and the Draft Spatial Plan for Wellington City. As representatives and advocates for LGBTQIA+ students in Wellington, we are concerned about the growing inaccessibility and unaffordability of housing and transport in Wellington as well as the various unsafe environments in our city. As a community, LGBTQIA+ people are disproportionately affected by many things, among them homelessness, poverty, sexual violence and physical harm. This spatial plan is a step in the right direction, and we support the many suggestions of this submission to create a more inclusive, accessible and safe city for LGBTQIA+ students.



### 7.3 Victoria University of Wellington Women's Collective

VUW Women's Collective are the representative group for women at Te Herenga Waka - Victoria University of Wellington. We advocate for women, as well as provide social and safe spaces. Women in New Zealand are still over represented and underappreciated in the "care economy", and suffer from the pay gap. We contribute more to childcare, household chores and emotional labour than our male counterparts and it is crucial that women are included in the spatial planning process from beginning to end. Planning must consider our safety, our independence, our access to community, and our livelihoods.



### 7.4 New Zealand Union of Student Associations

We are NZUSA, the national voice for tertiary students in New Zealand, and we support this submission.



### 7.5 Post Graduate Students' Association of VUW

The PGSA is the representative group for postgraduate students at Victoria University of Wellington. As representatives and advocates for postgraduate and mature students we are concerned with the availability and affordability of housing for international students and students with families. International students need greater access to affordable and flexible housing options to support their connection both to our community in Wellington and to their home. Mature students need affordable options with room for partners and dependents. We support VUWSA's submission on the WCC Draft Spatial Plan, and we

support the WCC Draft Spatial Plan as a step in the right direction for increasing the availability and affordability of housing in Wellington.



### 7.6 Ngāi Taura - VUW Māori Students' Association

Ngāi Taura is the Māori Students' Association at Te Whare Wananga o Te Upoko o te Ika a Maui - Victoria University of Wellington. Our core business is to represent and advocate for the wellbeing of taura Māori during their time at Victoria University. We support this submission.



### 7.7 Greens at Vic:

Greens at Vic support this submission and believe this spatial plan is an important tool in ending the housing crisis and mitigating the climate crisis. Enabling more housing is essential to ensure we don't prolong the housing crisis, and thinking ahead to the future now helps us prevent another one. Increasing supply is good for renters and good for affordability. A compact city is critical for becoming a carbon-neutral city. Continuing to sprawl outwards and forcing Wellingtonians out to Porirua and the Hutt, gentrifying those neighbourhoods, creates more emissions as residents are forced to travel long distances between home, work, and the cultural centre. Upzoning and mixed-use development, especially in the inner cities and inner suburbs in conjunction with LGWM, will allow more people to live in Wellington in close proximity to the supermarkets we shop at, the places we work at, and the facilities we study at. We tautoko this VUWSA community submission, and strongly support this plan!



## 8. Our consultation with our communities

We set up a survey form to get responses from young people in the university community. We got 75 responses from a wide range of young people. We have attached the full excel spreadsheet to this submission.

| What Suburb do you live in? |                           |                       |
|-----------------------------|---------------------------|-----------------------|
| Suburb                      | Percentage of Respondents | Number of Respondents |
| Te Aro / Wellington Central | 24%                       | 18                    |
| Kelburn                     | 18.7%                     | 14                    |
| Mount Cook                  | 9.3%                      | 7                     |
| Northland                   | 9.3%                      | 7                     |
| Mount Victoria              | 6.7%                      | 5                     |
| Aro Valley                  | 4%                        | 3                     |
| Newtown                     | 4%                        | 3                     |
| Brooklyn                    | 2.7%                      | 2                     |
| Island Bay                  | 1.3%                      | 1                     |
| Roseneath                   | 1.3%                      | 1                     |
| Thorndon                    | 1.3%                      | 1                     |
| Churton Park                | 1.3%                      | 1                     |
| Miramar                     | 1.3%                      | 1                     |
| Crofton Downs               | 1.3%                      | 1                     |
| Vogeltown                   | 1.3%                      | 1                     |
| Other / Unspecified         | 9.3%                      | 7                     |

Table 1. Suburb representation from consultation survey.

|                     | Age Group |       |      |
|---------------------|-----------|-------|------|
|                     | < 20      | 20-25 | >25  |
| <b>Percentage</b>   | 18.7%     | 80%   | 1.3% |
| <b>Total Number</b> | 14        | 60    | 1    |

Table 2. Age representation from consultation survey.

| Living situation?         |            |                     |
|---------------------------|------------|---------------------|
|                           | Percentage | Number of Responses |
| <b>Flatting</b>           | 81%        | 60                  |
| <b>Living with Family</b> | 8%         | 6                   |
| <b>Solo</b>               | 3%         | 2                   |
| <b>Hall of Residence</b>  | 3%         | 2                   |
| <b>Not Specified</b>      | 5%         | 4                   |

Table 3. Living arrangement responses from Consultation Survey.

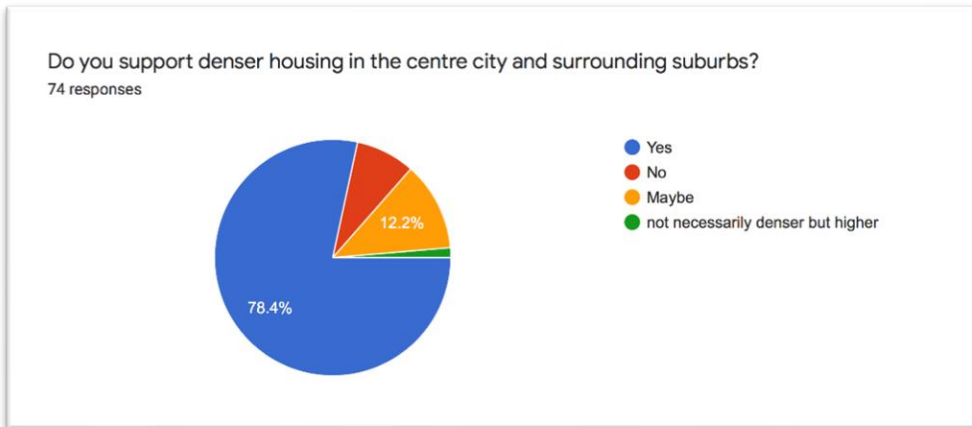


Fig. 1. Pie Chart showing support for denser housing in centre city and surrounding suburbs from consultation survey.

### 8.1 What does Wellington's character mean to you?

Our top responses were: culture, community, the people, and art.

Notable responses:

- “Wellington's character is prohibitive of growth and sustainability. It perpetuates inequality. Keep one of each we don't need 100. Wellington's character should reflect its people and their experiences. There is no need to place symbols of colonialism on pedestal.”
- “Wellington's character is more alive in the works of art and creative use of architecture and space around the city than it is in the heritage buildings and sites. To me, Wellington's character is created through the space that the people of Wellington have to express themselves. I love seeing the collaborative works of those from different cultures and backgrounds through community created art work and murals around the city. I think there is room for the history of our city to be preserved through art and expression, alongside an appropriate level of maintaining heritage

buildings. Appropriate = Not at the expense of building dry, healthy homes”

- “Wellington's character is partially about the buildings but more so about the people who make up the city. The community and culture is predominantly about how the people use the spaces provided for them.”
- “Character is something that builds upon the residential culture (coffee, etc has evolved from the people that live and grow in Wellington)- prioritising so called 'heritage' site if it has no real or genuine historical connection to Aotearoa is over development for property that will facilitate healthier/safer living environments and more housing is selfish (and possibly something only people with their own homes have the privilege to say).”
- “I think it's important to preserve a degree of culture/heritage, because it gives the city vibrancy and character. However, these buildings need to be made livable, and mid-high density needs to move in alongside them.”
- “Wellington's character is constantly evolving, and changes with each generation. I think there reaches a maximum point where buildings must be preserved, and it comes at the expense of proper housing and good conditions.”
- “Character is important, but not at the cost of proper living conditions. Many houses that are considered 'character' homes are far below the standard of living we should be promoting in New Zealand. Furthermore, we forget that much of Wellington's charm and character comes from new builds within the city that wouldn't even fall under a category of heritage or character.”

## 8.2 What are your experiences of flatting in Wellington?

Our top responses were: unaffordable, cold, damp, mouldy, stressful, bad landlords, cramped.

Notable responses:

- “Mostly damp and cold, property managers are also the worst. Not alot of selection and what is available is overpriced and not liveable. My 2nd year flat gave me pneumonia from the mould”
- “Terrible quality of life in damp, mouldy, old houses. Single glazing, no insulation, no light, no heat. Also massively overpriced rent for this.”
- “I have a nice flat but they are incredibly hard to get and incredibly expensive. People are stopping coming to vic because they can’t afford to live here. This will completely change the makeup of our city if we don’t work out how to build more housing.”
- “Mainly poor. I’ve experienced verbally abusive property managers, mouldy flats where mushrooms grow, and sky-high rents”
- “I had an awful flatting experience last year - our bathroom leaked into our kitchen for 8 months and our landlord didn't do anything about it.”
- “Feral - people are sacrificing bare necessities of healthy homes in desperation. Landowners are preying upon vulnerable demographics and capitalising off their desperation.”
- “As I move from hall to flats it’s clear that my group and I are going to have to take whatever we can get, no matter how terrible it may be. Finding a flat in Wellington as first-years going into second-year, without contacts, is an absolute rat race. It’s emotionally draining and leads to huge anxiety. We feel like we are at the bottom of the pack - this shouldn’t be the case at all (everybody needs a place to live!)”
- “SO EXPENSIVE for poor quality places. lived in a large garage that had been converted into a tiny three-bedroom house in first year, still being charged \$220 EACH because it was on the terrace. It wasn’t safe (falling down a hill/walls detaching from other walls) and was

super damp and leaky. The problem is that landlords know that students are desperate and so we'll pay the extortionate price for anything - blatant exploitation"

### 8.3 What do you want Wellington to look like in 30 years?

Our top responses were: cheaper and more affordable, more green spaces, more community spaces, more sustainable, more accessible, safer, better flats, more reasonable rent, better public transport.

Notable comments:

- "More community based. More community spaces. My biggest prob and also fave thing with Welly is that everything is condensed into this tiny little compact CBD. It's great because you can walk everywhere once you're in the CBD, but means theres limited opportunity for living nearby the action. Would be cool to see smaller communities within the community, with essential shops and more community spaces, places to dine/hangout further out from the CBD. Kinda like Newtown but more widespread and less mouldy housing (: but I also think we should go up instead of out with housing development which is kind of contradicting to what I just said... maybe balance between the two. and green space and community gardens and most importantly, less cars."
- "More medium density inner-city housing with local business thriving as well as it is today without large multi-national companies taking over local business places."
- "More housing supply so that tenants can have more choice in where they live and landlords have to compete to maintain good tenants. Denser housing in the city centre and other central suburbs which would provide warm dry and hopefully reasonably priced accommodation."
- "A car free city center with low cost, high density housing. Lots of accessibility and safety for pedestrians and cyclists (more e-bikes around

would be good to see). Reliable and affordable public transport from outer suburbs, where people can still pursue their quarter-acre dream. I also want to ensure our cultural icons (places and people!) aren't priced out of the city or otherwise forced out.”

- “Every person should be able to have a house to live in, they should not have to be working two jobs to do survive”

#### 8.4 What do you want to keep in mind when Wellington City is designed?

Our top responses were:

- accessibility (especially considering Wellington’s geography),
- safety (especially for women),
- sustainability,
- environmentally friendly,
- quirky aesthetics,
- Te Ao Māori,
- accessibility to public transport.

#### 8.5 What amenities do you want to see more of in the city?

Our top responses were: public spaces, toilets, green spaces, safe zones, community gardens, more public artwork, expanded walking/cycling areas, another supermarket, footpaths, compost bins, bike parks/storage, picnic tables

- Majority of respondents wanted more green spaces.

#### 8.6 Other comments:

- “I currently have rent I can afford and ideal location but it comes with the cost of no sunlight causing issues with my health and studies and I struggle with wanting

to find a new place for my health but then also wanting to stay because it's the only place I can afford and is ideal location for uni.”

- “Resistance to the spatial plan seems like a waste of energy. Buildings with heritage value will still be protected with the passing of the plan.”
- “Students should not have to suffer financial debt to live in welly. Houses should be affordable and safe.”
- “Students shouldn’t have to suffer at the expense of heritage and rich old people.”

## **9. Consultation**

We are incredibly disappointed with the consultation process undertaken with the Spatial Plan. VUWSA had to reach out to councillors in order to understand the plan. As students are one of the key stakeholders in the future of the city, the council should have engaged in proactive consultation with Wellington’s student population from the plan's inception. Whilst councillors did visit community centres and residents' associations, these are inaccessible and not welcoming for young people. This plan disproportionately affects young people in the city and our experiences and needs must be taken into account respectively. It is unacceptable that we, as students, have had to fight to have our voices heard on an issue that will immensely impact our own futures.

Additionally, neither the way the council takes submissions on this plan, including navigation of the website, or the way the spatial plan is explained, are student friendly. In future, the Council must proactively consider the student voice, or risk alienating and negatively impacting a major stakeholder in the future of Wellington.

## **10. Conclusion**

This spatial plan is essential in creating a better future for students and young people in Wellington. We strongly support the spatial plan and ask our councillors to do the same. It will make a positive difference to our mental and physical health, cost of living, ability to study, and overall quality of life. To support this plan is to care about young people and our futures.



**From:** Katie Underwood [REDACTED]  
**Sent:** 05 October 2020 15:54  
**To:** BUS: Planning For Growth  
**Cc:** 'Brooklyn Wellington'; Greater Brooklyn Residents Association  
**Subject:** Spatial Plan Submission - Greater Brooklyn Residents Association  
**Attachments:** BRAI submission on WCC Draft Spatial Plan.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Blue Category

Greetings

Please find attached a submission from the Greater Brooklyn Residents Association Inc. regarding the spatial plan consultation.

Please note this submission as coming from the Chair – GBRAI. It is not from me in person. The synopsis should only have Chair GBRAI as reference.

We would like to opportunity to speak to our submission.

Can you please acknowledge that you have received this submission.

Kind regards

Katie  
Chair  
GBRAI



## **WCC Draft Spatial Plan Consultation**

### **Greater Brooklyn Residents Association Incorporated (GBRAI) Submission**

**5 Oct 2020**

Greater Brooklyn Residents Association Incorporated (GBRAI) appreciate the opportunity to provide feedback on the Wellington City Council Draft Spatial Plan.

We have had discussions on the Spatial Plan as an Executive Committee but have not undertaken any wide-reaching consultation or engagement with our community as we don't have the resources to do that. Having attempted to facilitate wider discussion on the recently proposed temporary cycle lane up Brooklyn Rd we know first-hand how expensive and time consuming trying to reach and engage with every resident can be.

We are disappointed not to have been offered an engagement event somewhere within Brooklyn and feel that our community has been short-changed. We have a significant population and issues that are different to neighbouring inner and outer suburbs and therefore deserved at least one specific consultation event, with clear large-scale printed material available to view.

As we haven't undertaken wide community consultation, we don't feel that it is appropriate to 'take a position' on the whether we do or do not support the Draft Spatial Plan. Therefore, we have tried to respond based on the outcomes of previous engagement within Brooklyn such as the Kaka Project, where the overwhelming collective view of residents was a desire to maintain Wellington's compact nature, make it more sustainable, improve public transport, support active modes of moving around safely, maintain and improve access to open space etc.

We have also encouraged residents in the Greater Brooklyn area to make their own individual submissions as part of this consultation. We do however have a number of concerns over some aspects of the Draft Spatial Plan which we envisage would be common concerns within our community and so have included them in our comments below.

#### **1. Comments on the Brooklyn area:**

- Brooklyn is a unique suburb and deserves more consideration of both its existing built fabric and also for how it might grow. We would like a more detailed heritage assessment to be carried out (we have been asking for one

for about 15 years and have lost some buildings with significant heritage value during this period). A thorough heritage and character assessment should be a precursor.

- The Draft Spatial Plan proposes major change to the way that the Brooklyn village centre and surrounding areas would be allowed to grow and we would like the opportunity for Brooklyn residents to work collaboratively with Council on the detail of how that might happen.
- As an example of how improved comms and engagement might be enabled, GBRAI recently arranged for the delivery of printed copies of a Traffic Resolution consultation to every household in the greater Brooklyn area and organised an independently facilitated discussion between WCC officers and residents over Zoom. WCC could have funded each Residents Association to do a similar thing to ensure widespread engagement. Within this consultation WCC could have modelled imaginary streets or blocks or suburbs to illustrate how it is imagined that they might incrementally develop over the next 5, 10, 30 years as per what is being allowed in the Draft Spatial Plan.

This may include discussion of things such as:

- Opportunities for both outdoor and indoor public space improvements. Pocket parks or perhaps a town square (there is no 'public space' other than footpaths at present and this would likely require the purchase of private land) and interior public space such as opportunities for a redeveloped public library (the existing library was minimally strengthened, just enough to remove the yellow sticker, with the intention of future upgrades either in the current or on a new site). These issues require the Council to be proactive, not reactive before it is too late and the good sites are already developed by others;
- Potential effects of shading and wind on existing public space (footpaths) and potential new public spaces (pocket parks, landscaped areas etc.);
- Traffic impacts (e.g. investigations into ways to slow traffic, improve cycling safety, improve pedestrian crossings, mitigate noise and safety effects of landfill traffic from future construction work right across the city coming through the Brooklyn Village centre, etc.);
- Impacts on parking (there is the potential for WCC to make use of a considerable number of existing parking spaces on private land to better manage demand for on-street and perhaps to moderate the competing demands for public space improvements and vehicle access to potential future private developments);
- Opportunities for better/safer walking and cycling connections to Central Park and the city centre and between the three local schools;
- Consideration of how Brooklyn School might be able to grow to meet the needs of additional residents in the area (space is very constrained and there is very little green space on their current site);
- Consideration of how community facilities might grow or adapt to meet the needs of additional residents;

- Consideration of how Brooklyn might better manage water (stormwater and wastewater in particular);
- Consideration of existing views of the harbour, city and surrounding hills when considering changes to building height controls in and around Brooklyn;
- Who the new residents are likely to be and what their needs might be.

## 2. General comments on how the city grows (these also relate to Brooklyn):

- **Compact form** - We note that a key outcome of the 'Our City Tomorrow' consultation undertaken in 2017 was that residents wanted a city that is compact, and this was an outcome of previous Kaka Project consultation. We recognise that compared to other options such as new greenfield suburbs, the currently proposed allowances for growth will clearly lead to it being a more compact city than it may otherwise be.
- **Transport is key** - How Wellington grows to accommodate its future residents is inextricably linked to the options that its residents will have to move around the city. By delaying this process slightly, outcomes of the 'Let's Get Wellington Moving' project could have been incorporated into the Draft Spatial Plan to enable a wholistic view of how and where Wellington should grow. As then Mayor Justin Lester said just after the LGWM announcements on 16 May 2019: "But LGWM is not just about a better transport network, it's about investing in and sparking urban development. With reliable and regular mass transit the city can grow alongside the public transport spine". This was an opportunity for an integrated vision and one that might have given more certainty to where increased density was most likely to happen and clearer encouragement for it to happen along the proposed mass rapid transit route rather than in inner and outer suburbs.
- **Demonstrating a vision** - This consultation was an opportunity for inspirational images of a range of possible built solutions to higher density housing, which would have helped people to not only better understand the various types of development they could expect to see within their street or neighbourhood, but also to set a standard of 'density done well'. These would most likely be international examples as they are few and far between in New Zealand and even less common in Wellington at present (although there are some examples in Wellington of 'density done well' such as Zavos Corner in Mt. Victoria, which replaces one dwelling with eight).
- **Local nuance** - More nuanced consideration should be given to exactly where 4, 6 and 10 storey height limits are appropriate across the city. For example whilst 10 storey may well be appropriate for wide roads such as Victoria, Taranaki, Kent/Cambridge and Adelaide Rd they are very unlikely to make Wellington a pleasant place if they are implemented on narrower streets such as Jessie, Frederick, Haining, Wigan and other similar scaled streets that are more likely suited to 4-6 storeys of finer grain urbanism – similar to what is anticipated for Brooklyn Village. As with Brooklyn, pocket parks and improvements to public space need to go hand-in-hand with proposed increases in density and it is currently unclear what is actually intended within the Draft Spatial Plan in this regard.

- **Affordability** – the Spatial Plan should help with improved affordability, but it should be alongside other drivers to make that a built reality. For example, a proportion of affordable dwellings as part of all new developments (this is very common overseas) could be included in the District Plan rules.
- **Sustainability** – Affordability isn't just about \$, it is also able creating a city that the planet can afford to sustain. The Spatial Plan could contain a vision of car share, electric and hydrogen vehicle facilities, provision of public/green space, three waters on-site management etc. being delivered in exchange for greater height/density etc.
- **Ecology** - With the declaration of climate and ecological crisis these two lenses need to be across every change to how the city develops. The Draft Spatial Plan contains limited information about the promotion of biodiversity within the city and its surrounds and both climate and ecology need to be brought to the fore in the final Spatial Plan so that there is a clear vision for residents and developers for the next 20 – 30 years of growth.

We appreciate that most of the detail will be in the proposed changes to the District Plan and we look forward to being involved in the proposed non-statutory Draft District Plan consultation scheduled for 2021.

In the meantime, we would welcome the opportunity for discussion on the items in Part 1. Above and in particular would welcome funding to enable GBRAI to work in partnership with Council to better engage with our community.

Yours sincerely,

GBRAI Executive Committee

**From:** Harriet Margolis [REDACTED]  
**Sent:** 05 October 2020 11:46  
**To:** BUS: Planning For Growth  
**Subject:** Submission on the Draft Spatial Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

kia ora

Please find attached a .pdf of the submission form plus an addendum.

Once again, the Council's process for this submission has been unsatisfactory., further undermining the Council's credibility.

regards

Dr Harriet Margolis

[REDACTED]  
Mount Victoria  
Wellington 6011  
New Zealand

[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](mailto:planningforgrowth@wcc.govt.nz)

You can also answer these questions online at:  
[planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form](http://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](http://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](mailto: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](http://planningforgrowth.wellington.govt.nz) > Draft Spatial Plan > View Draft Spatial Plan

**Mobile and accessible version** [planningforgrowth.wellington.govt.nz](http://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](http://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)*:    | Harriet Margolis   |                                |  |                                       |
| Your email*:                    | [REDACTED]   |                                |  |                                       |
| Postal address*:                | [REDACTED]   |                                |  |                                       |
| Suburb:                         | [REDACTED]   |                                |  |                                       |
| Phone number:                   | [REDACTED]   |                                |  |                                       |
| Age range:                      | <input type="checkbox"/> Under 18  | <input type="checkbox"/> 25-34 | <input type="checkbox"/> 45-54                                     | <input type="checkbox"/> 65-74        |
|                                 | <input type="checkbox"/> 18-24   | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 55-64                                     | <input type="checkbox"/> 75 and older |
| Household:                      | <input type="checkbox"/> Couple without children   |                                | <input type="checkbox"/> Household of unrelated persons (flatting) |                                       |
|                                 | <input type="checkbox"/> Household with children living at home  |                                | Other (please specify) _____                                       |                                       |
|                                 | <input type="checkbox"/> Household with children who are no longer living home   |                                | _____  |                                       |
| 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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?*   | <i>See attachment.</i>  |                          |                          |                          |                                     |                          |  |  |
| 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)  | <i>See attachment.</i>  |                          |                          |                          |                                     |                          |  |  |
| 7. What amenities would you want to help create a vibrant suburban centre?*<br>Please pick your top 5 from the options below.  | <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Proximity to parks and open space<br/> <input type="checkbox"/> Access to public transport<br/> <input type="checkbox"/> Public/shared spaces<br/> <input type="checkbox"/> Commercial activity (retail, cafes, local businesses)<br/> <input type="checkbox"/> Employment opportunities<br/> <input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc)                 </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater)<br/> <input type="checkbox"/> Social services and community facilities<br/> <input type="checkbox"/> Medical facilities/centres<br/> <input type="checkbox"/> Access to cycleways/routes<br/> <input type="checkbox"/> Walkability within the centre<br/> <input type="checkbox"/> Easy walking distance to the centre<br/> <input type="checkbox"/> Other (please specify)                 </td> </tr> </table> <p style="text-align: center;"><i>Blunt instrument</i></p> |                          |                          |                          |                                     |                          | <input type="checkbox"/> Proximity to parks and open space<br><input type="checkbox"/> Access to public transport<br><input type="checkbox"/> Public/shared spaces<br><input type="checkbox"/> Commercial activity (retail, cafes, local businesses)<br><input type="checkbox"/> Employment opportunities<br><input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater)<br><input type="checkbox"/> Social services and community facilities<br><input type="checkbox"/> Medical facilities/centres<br><input type="checkbox"/> Access to cycleways/routes<br><input type="checkbox"/> Walkability within the centre<br><input type="checkbox"/> Easy walking distance to the centre<br><input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> Proximity to parks and open space<br><input type="checkbox"/> Access to public transport<br><input type="checkbox"/> Public/shared spaces<br><input type="checkbox"/> Commercial activity (retail, cafes, local businesses)<br><input type="checkbox"/> Employment opportunities<br><input type="checkbox"/> Community spaces or 'hubs' that provide for a variety of functions (working, study, etc) | <input type="checkbox"/> Infrastructure (stormwater, water supply, wastewater)<br><input type="checkbox"/> Social services and community facilities<br><input type="checkbox"/> Medical facilities/centres<br><input type="checkbox"/> Access to cycleways/routes<br><input type="checkbox"/> Walkability within the centre<br><input type="checkbox"/> Easy walking distance to the centre<br><input type="checkbox"/> Other (please specify)  |                          |                          |                          |                                     |                          |  |  |
| 8. What amenities would you want to see around future mass rapid transit stops?*<br>Please pick your top 5 from the options below.   | <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Public shared spaces<br/> <input type="checkbox"/> Landscaped spaces/plantings<br/> <input type="checkbox"/> Parks and playgrounds<br/> <input type="checkbox"/> Shops and businesses<br/> <input type="checkbox"/> Cafes and restaurants<br/> <input type="checkbox"/> New housing                 </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Community facilities (libraries, community spaces, social services, etc)<br/> <input type="checkbox"/> Child care<br/> <input type="checkbox"/> Medical facilities/centres<br/> <input type="checkbox"/> Bicycle parking<br/> <input type="checkbox"/> Other (please specify)                 </td> </tr> </table> <p style="text-align: center;"><i>Blunt instrument</i></p>   |                          |                          |                          |                                     |                          | <input type="checkbox"/> Public shared spaces<br><input type="checkbox"/> Landscaped spaces/plantings<br><input type="checkbox"/> Parks and playgrounds<br><input type="checkbox"/> Shops and businesses<br><input type="checkbox"/> Cafes and restaurants<br><input type="checkbox"/> New housing   | <input type="checkbox"/> Community facilities (libraries, community spaces, social services, etc)<br><input type="checkbox"/> Child care<br><input type="checkbox"/> Medical facilities/centres<br><input type="checkbox"/> Bicycle parking<br><input type="checkbox"/> Other (please specify)   |
| <input type="checkbox"/> Public shared spaces<br><input type="checkbox"/> Landscaped spaces/plantings<br><input type="checkbox"/> Parks and playgrounds<br><input type="checkbox"/> Shops and businesses<br><input type="checkbox"/> Cafes and restaurants<br><input type="checkbox"/> New housing   | <input type="checkbox"/> Community facilities (libraries, community spaces, social services, etc)<br><input type="checkbox"/> Child care<br><input type="checkbox"/> Medical facilities/centres<br><input type="checkbox"/> Bicycle parking<br><input type="checkbox"/> Other (please specify)  |                          |                          |                          |                                     |                          |  |  |



|  | Strongly Agree           | Agree                    | Neutral                  | Disagree                 | Strongly disagree                   | Not sure                 |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 9. To what extent do you agree or disagree with the following statement?*:<br><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.<br>(Refer to <i>Our City Tomorrow</i> fact sheet number 01) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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.   |                          |                          |                          |                          |                                     |                          |
| What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?*<br><i>My own garden.</i>   |                          |                          |                          |                          |                                     |                          |
| What amenities or facilities were missing or could have been improved?* <i>What could have been better had to do with the tangata.</i>   |                          |                          |                          |                          |                                     |                          |

**Section 3 - non-compulsory questions**

| 1. What do you like about <i>Our City Tomorrow: A Draft Spatial Plan for Wellington City</i> ?<br><i>Not much.</i>   |                          |                          |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 2. What would you change or improve?<br><i>See attachment.</i>   |                          |                          |                          |                          |                                     |                          |
| 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> ?<br><i>Facts.</i><br><i>→ again, blunt instrument questions</i> |                          |                          |                          |                          |                                     |                          |
| 4. To what extent do you agree or disagree with the following statements considering what is proposed for the inner suburbs:   |                          |                          |                          |                          |                                     |                          |
|  | 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 type="checkbox"/> | <input checked="" 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 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?<br><i>View this section of Our City Tomorrow (the Draft Spatial Plan):<br/>planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; 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?<br><i>View this section of Our City Tomorrow (the Draft Spatial Plan):<br/>planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; 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:<br><b>Te Motu Kairangi/Miramar Peninsula</b><br>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.<br><b>Strathmore Park</b><br>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 <b>community planning process</b> for the following areas?  |                          |                          |                          |                          |                          |                          |
| 8.1.1 <b>Te Motu Kairangi/Miramar Peninsula</b><br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure  |                          |                          |                          |                          |                          |                          |
| 8.1.2 <b>Strathmore Park</b><br><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?

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><a href="http://planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; Natural &amp; Open Space">planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; Natural &amp; Open Space</a></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.

14. Have you provided an attached document?

Yes  No

Addendum to submission form from Harriet Margolis

██████████ Mt Victoria; ██████████

Some General Observations as a Starting Point:

Cities change over time.

Sometimes urban planning works, but sometimes not.

**All Wellingtonians should be able to live in healthy, affordable homes in safe neighborhoods.**

**If Wellington is to continue to be a desirable city to live in**, it must retain fundamental characteristics that appeal to its growing population. Not least among those characteristics is the fact that it is a pleasant place to live, not least because so many of its **neighborhoods** offer the opportunity for their residents to live together as neighbors.

All neighborhoods should have diversity in their population, including economic diversity. **Government support—both national and local—should play a role in making economic diversity possible** because economic considerations will not lead private developers to support affordable housing.

**Neighborhoods** have amenities and characteristics that enable civil interactions among their inhabitants. That's how they become neighborhoods.

Not all neighborhoods are alike, but **successful neighborhoods enable neighbors to interact**, kanohi ki te kanohi, on a casual basis as well as at organized events, for example, at annual street parties or at large group meetings with local political representatives. Such encounters require both people-friendly outdoor public spaces and accessible indoor spaces available for public gatherings of as many as 100 people.

Casual interaction among neighbors often involves bumping into each other on footpaths, lingering for a moment instead of hurrying on, or stopping to talk in passing with a neighbor spotted on her/his property. **Built as well as natural environments affect this sort of interaction.** High blank walls and urban canyon architecture do not contribute in a positive way.

Inhabitants of neighborhoods should be able to **interact with other parts of the city, especially through footpaths friendly to pedestrians and through easy access to public transport.** (If new housing is so important, then space for parking and more roads or tunnels should be a secondary concern.)

**Wellington currently has a mix of housing** throughout its suburbs, including multistory buildings in older areas better known for their single-story, single-family dwellings. Some of that has been planned, but much of it has happened over time, partly as a natural evolution.

**Some multistory buildings are better than others.**

Some developers are better intentioned than others.

**Some urban planning proposals are more specific than others.**



Some General Observations Drawn from My Neighborhood:

As it happens, **my neighborhood is Mt Victoria**. When I moved here in May 1994, there were very few children on my street; now, more houses than not have families with children living here. As weekly rates for renting have risen, tenants are more likely to be young professionals rather than students. None of the houses on this street are derelict; every house on the street has had repair and maintenance work done, much of it significant and all retaining the street's historical character. Even the two two-storey buildings built in the 1990s that replaced a pre-1930s house have fitted in relatively well, given their placement on their lot and the amount of street-facing garden that enables.

**Many of us who live here could not now afford to buy into the street at current prices, and yet many of the new owners are relatively young.**

We have a mix of ages, a mix of ownership, a mix of permanent and more transient residents. While the population has changed, diversity remains, albeit of a different variety, and what were shabby houses are now tourist attractions because of their history, charm, and beauty, including their gardens.

**The street, like Mt Victoria itself, has progressed through a natural transition.**

**Council has been able to raise our rates, benefiting the city at large.**

**Neighborhoods can also make transitions from better to worse. Bad urban planning often hastens such transitions.**

If an area already has a high level of population density relative to other parts of the city, should planners impose a disproportionately higher level of population density on it, against the will of its inhabitants? That doesn't seem fair. In the case of Mt Victoria, as the current proposal stands, that imposition seems arbitrary.

Are there no **alternatives**? Of course there are.

Wellington has numerous areas of **brown field spaces** throughout the CBD as well as in the suburbs. And are **low-rise commercial buildings** as well as derelict, unused spaces more important than viable housing in existing, flourishing neighborhoods? Adelaide Road may be an obvious example, but Kent and Cambridge Terraces are equally obvious, and residents throughout the city must have their own favorite suggestions for other alternatives.

**Perhaps the housing that could be built on these sorts of spaces would actually cover requirements.**

**The Draft Spatial Plan could do with more statistics in this regard for sure.**

Our street, full of wooden houses up one side and down the other, is so narrow that a fire appliance cannot make its way from entry point to end. In 1997 a commercial building on Hania Street that runs behind several of our homes was converted into flats. Since then there have been problems with tenants from those flats tossing all sorts of rubbish, including cigarette butts, out their windows onto our properties, as well as increased noise and decreased privacy.

If the developers had had their way, the conversion in question would have involved an additional storey. Fortunately for us, in this case Council rejected their request, instead adhering to Council rules about height limits.

I am usually dubious about citing precedent as a justification for current and ongoing practice. However, I cite this example to make the point that, **over time, Council has taken various, sometimes contradictory, positions on how it handles resource consents, demolition, character/heritage issues, and so forth.** One consequence is that we have learned to distrust Council when it writes reassuringly about changes that might affect our daily lives in significant and negative ways.

The current proposal to scrap the protection for pre-1930s houses is a case in point.

This point is worth further consideration.

My point is not the usual one about how older houses in older neighborhoods embody a city's history of development through, for example, the stories of their inhabitants as well as the evidence of their physical structures and gardens. This point is more along the lines of being doomed to repeat our failures if we forget our history.

In the mid-1990s one of the local gallery spaces had an exhibition about the group of architects who argued in the 1950s that the single-family dwellings in Mt Victoria should give way to high-rise, densely populated towers.

Their argument clearly failed to convince Mt Victorians and Wellingtonians more generally, and later efforts by Mt Victorians who were raising families in the 1970s-1990s also managed to stave off similar attempts to reconstruct this suburb from the ground up.

In 2017 Council itself sent a letter notifying Mt Victoria property owners of completion of the Mt Victoria Heritage Study that it had undertaken. Although that document has apparently been removed from the website announced in the Council's letter, less than three years ago Council was assuring us that it appreciated the value of our houses and their contribution to the city's greater good.

Obviously there were **some seriously good reasons for keeping Mt Victoria's old houses** over the previous seven decades, just as there are now. **Must we really fight this fight over and over again?** Valuing these houses is not necessarily a total rejection of change, but the failure to value them, the constant threats that need to be fought off—these things do tend to make residents take a harder line against change proposed by a Council that squanders our trust and good will.

Here is another historical recollection. **For more than a decade there was a gaping hole in Courtenay Place**, the result of a wholesale tearing down of buildings in the 1980s without having secured the means to build their replacements. That hole is **filled now, by the Reading Cinema building.** Hardly an improvement, but it does serve as a cautionary example, for **a building that**



**cannot be used because it was not properly built is worse than an open space.**

**There is nothing in the Draft Spatial Plan that precludes such poor construction in the future—only casual unsupported assertions meant to reassure.**

I do not on principle oppose high-rise buildings or increasing density. I actually prefer high-rise buildings to the appropriation for housing and transport of publically accessible natural green space.

I have traveled extensively in Asia, Europe, North America, Australasia, and countries bordering the Mediterranean. **I love cities**, not least because of their architecture, both old and new. **But some architecture is better than others**, and Aotearoa provides many examples of bad choices and worse decisions.

Furthermore, **tall buildings do not equal density**. And they do not, in and of themselves, equal density **done well**.

Have you noticed that **Wellington's older buildings** have not done so badly when it comes to **withstanding earthquakes**, while **some of the city's newest buildings have been extraordinary failures**? My own home's resilience through reasonably serious quakes has been reassuring, in contrast with the CBD's tall buildings with glass facades.

So why should Wellingtonians blindly accept assertions in the Draft that the proposed new housing will be an improvement when there are no guidelines to provide assurances of their nature and quality, and past history shows that guidelines are not always followed?

Instead, the Draft tells us that previously debated, accepted, and established guidelines will be removed, with the likely consequence that some of Wellington's most reliably earthquake-resistant housing will be torn down.

And for what? Get-rich-quick schemes for today's developers at the expense of tomorrow's residents?

#### What would I like to see?

1) Get Wellington's infrastructure problems sorted before plans advance for housing. Ideally, considerations of clean air as well as clean water would figure more largely in Council planning. But sewer systems and geological considerations also seem to be getting short shrift.

In 2019 Council planners told us that housing plans would be organized around future public transport plans, but that isn't what appears in the Draft. Planning for both problems should at least go forward in tandem.

2) Where's the coordination with WRC? Sorting out our housing issues is a regional problem.

3) Acknowledge officially the de facto boundaries of Mt Victoria. If you include Kent Terrace at the very least, your calculations and plans for housing density, etc., will need some adjustment. And take into consideration the many public buildings and green space that occupy such a large percentage of Mt Victoria—

meaning that where there is private housing, there is already a significant density of population.

4) Develop a phased system of changes to housing in Wellington and its environs, rather than suggesting wholesale demolition with no serious assurance that something better will replace what will be lost. Phasing will also allow for the possibility of variations in style, as well as the opportunity to learn as changes progress, incorporating new developments in materials, construction practices, and so forth. I do not want to see a sameness of construction throughout the town; I want to see the expression of personality and creativity on the part of our architects, designers, developers, builders, owners, and so forth.

5) Above all, I want Wellington to continue to be a desirable place to live.

I understand that Wellington got classified as a Tier 1 city, putting it in with Auckland. That has to be a bad thing. The cities have different geographical characteristics; their residents have different tastes. Imposing what would work for Auckland onto Wellington and its residents is not just insulting—it's likely to be harmful. Whatever attracts people to Auckland, that isn't what attracts people to Wellington.

**If you destroy Wellington's character in an attempt to impose one-size-fits-all solutions to urban challenges, then you will ruin Wellington's economic viability as well.**

#### Some Observations on This Submission Process

1) **The Council's credibility has been undermined by its own processes asking us to use submission forms that corral our responses into easily quantifiable results that tend to support what appear to be the Council's pre-set desired outcomes.** This Draft Spatial Plan process seems less reprehensible than the recent process for the Central Library, but the damage has been done.

For example, references in the official submission form to "Central City fact sheets" come without indications of how to access those documents, and the general website for the Spatial Plan exercise must have hidden them very well, for they don't appear via the search function or even a manual search. This, among so many other aspects of the process, is frustrating not least because it creates the impression that Council is just trying to wear down citizen will to engage in an informed way.

The one .pdf

([https://planningforgrowth.wellington.govt.nz/data/assets/pdf\\_file/0011/13700/OCT-Vision-Goals-Directions-010987-Planning-for-Growth-Spatial-Plan-Fact-sheets-Digital-Final.pdf](https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0011/13700/OCT-Vision-Goals-Directions-010987-Planning-for-Growth-Spatial-Plan-Fact-sheets-Digital-Final.pdf)) that I managed to find that calls itself a fact sheet is merely a collection of assertions that sound highly aspirational rather than factual—much like the Draft Spatial Plan itself.

2) **Aspirations** are lovely things, but an official proposal of this sort should rest on more solid ground. So many problems with **unsupported assertions** appear in the "Summary of Our City Tomorrow" that it is difficult to know where to begin. For example, I have heard plausible arguments for questioning the fundamental assertions about expectations and timing of population growth.



That assertion underpins everything else. When Council itself provides various figures for expected growth, well, what are we to believe? Not the Council's credibility, and possibly not its competence.

Another, almost equally problematic fundamental assertion is that building more houses and apartment buildings will solve the problem. It just isn't that simple.

Page 7 of the Summary is nothing but aspirations. It all sounds great, really, but where is the support for these assertions? Show me some data, something specific, some concrete assurances of how we could possibly reach these goals.

**Do not ask me to believe these things will happen simply because they appear in a Council publication. Council doesn't have that sort of credibility.**

**And covering the factual gaps with references to Council officers exercising their discretion further weakens Council's credibility.**

3) While the media are definitely in part to blame, some elected politicians and some Council staff seem also to be **contributing to an apparent generational divide**. It may seem reasonable to include questions about age and the number of people in a household, but it also looks as though this information might be used to set up oppositions between different groups of people that don't necessarily exist in reality.

So providing my age and whether I share my home with none or a multitude of other humans seems like an invasion of privacy that will support dubious arguments about intergenerational warfare. Hence I have avoided using the online option of making a submission via the form provided because it insists on answers to those questions.

This point doesn't seem ridiculous or trivial to me because I have been reading and listening to media reports as well as general conversation about a divide in which young Wellingtonians are thought to wish old Wellingtonians dead and gone so that their houses would be available to new owners. And no, I'm not one of those "property-owning 70-year-olds" nor "young would-be house buyers" referred to in a recent *Guardian* item about Wellington's housing dispute ([https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first?CMP=Share\\_iOSApp\\_Other](https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first?CMP=Share_iOSApp_Other)).

Even if all current home owners drop dead, most really young people are not going to have the money to buy our homes—unless, like most of us, they have been lucky enough to have had elderly relatives with wealth to support them or to have had jobs and discipline enough to have saved their own way into home ownership.

Whether the sort of activities for building community cooperation described in the *Guardian* article would work here or not, fomenting generational dislike does Wellington nor its citizens any good. We already have disharmony over eScooters and other issues that need resolution to the satisfaction of all.

4) **This consultation process is biased in favor of people wealthy enough to have sufficient access to digital equipment and the internet, as well as time, to absorb and respond to the submission process.** It does a great disservice to

a large part of Wellington's population, many of whom are probably among those who supposedly would benefit from what the Draft Spatial Plan proposes.

#### One Last Point

I applaud the generous work done by the Mt Victoria Residents Association and the Mt Victoria Historical Society in providing opportunities for Mt Victoria's residents to learn about the Draft Spatial Development Plan.

I especially appreciate the detailed history and the fact-based reasoning that underpins their conclusions.

Therefore, in general, I support the positions that these two organizations have taken in their submissions to Council in response to the Draft Plan.

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: **14649**

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Helen Law

**Suburb:** Johnsonville

## 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?**

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?**

**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?**

That every inner suburbs should have its unique character and that people travels, in public transport to these suburbs.

**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, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Social services and community facilities, Walkability within the centre

**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.), 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.**

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?**

Having green spaces that are usable during different levels. And be able to go to the local show once opened

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

Outdoor community spaces

**Non-Compulsory Questions**

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

Intensity development in the city, inner suburbs and the transport nodes in the outer suburbs

**2. What would you change or improve?**

For development intensification to be right, we need to consider not just the minimum or maximum heights.

Each development needs to have certain distance setback and slight height variation from each other so we get the right amount of sunlight, fresh air and privacy.

**3. The government and council needs to step in and have the right policies, plans in place. Also a vision for developers, homeowners and general public how some of these visions will work**

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

We need to plan with neighbouring councils - Hutt and Porirua and make the most of our transportation networks.

**5. 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.**

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.**

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.**

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?**

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?**

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

**From:** Vivienne Morrell <wgtn@historicplacesaotearoa.org.nz>  
**Sent:** 05 October 2020 13:40  
**To:** BUS: Planning For Growth  
**Cc:** Felicity Wong  
**Subject:** Submission on Draft Spatial Plan  
**Attachments:** DSP HPW Submission.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Please find attached Historic Places Wellington's submission on the Draft Spatial Plan.

Felicity Wong, Chair  
HPW  
1.40pm 5 October 2020





Historic Places Wellington Submission  
WCC Draft Spatial Plan



Historic Places Wellington  
PO Box 12426  
WELLINGTON 6144  
[wgtn@historicplacesaotearoa.org.nz](mailto:wgtn@historicplacesaotearoa.org.nz)

Felicity Wong (Chair)  
Ph [REDACTED]  
Ben Schrader (Vice-Chair)  
[REDACTED]

5 October 2020



## MEMBERSHIP

1. Historic Places Wellington (HPW) is a registered charity and incorporated society that promotes the identification, protection and conservation of historic places in the Wellington region for the benefit of the community and the general public. HPW makes this submission on behalf of its 120 members. It wishes to be heard in an oral submission process.

## KEY POINTS

- An important part of Wellington's distinctive heritage is determined by its wooden houses nestled on hillsides and valleys – it is more than “character”.
- The pre-1930 demolition rule in its inner city heritage suburbs has helped retain that.
- HPW opposes any diminution of that rule.
- Intensification should be phased according to short, medium and long term housing needs.

## TIMBER, OUR NATURAL HERITAGE

2. Some say the old houses in Wellington's inner city suburbs are symbols of ‘colonialism’ and have no place in a post-colonial world. The statement is simplistic. Many earlier owners and occupants were pawns in the colonial system escaping from poverty and servitude in their homelands.
3. The old timber houses remind Wellingtonians of sometimes shameful acts of the past but it is not a bad thing. The deforestation of Aotearoa saw trees felled to clear land but also to build houses. The timber was exploitatively exported and also used locally. Wellington's 130 year old cottages and villas typically have centuries old heart matai flooring and heart rimu weatherboards. It is said to be ‘as hard as steel’. Windows and doors are crafted in totara, rimu and kauri. If the wood is kept dry, it will last another hundred years or longer. Unlike Europe, Aotearoa has no termites or woodworm, only borer and they can be controlled. Aotearoa's low-land native forests have largely gone. Let us not destroy the wooden houses too. That would be a travesty.



## TIMBER, RESILIENT AND SUSTAINABLE

4. Old wooden houses are resilient. Light and flexible timber frames allowed many houses to survive the Napier and Christchurch earthquakes. Demolition of this built resource and re-building in modern manufactured materials with high

embodied energy is not a ‘green’ solution. It is wasteful of the planet's resources. Timber framed houses can be easily adapted to create space for more occupants. A Victoria University study found clever adaptations using attic spaces, basements, additions and outbuildings. Retrofitting for better thermal insulation and draught-

proofing under floors, in walls and ceilings is now standard practice. Roof lights can be effectively used to increase natural lighting.

## DESIGN HISTORY

5. Timber villas are steeped in history. The proportion of rooms, windows and doors are classical, originating from ancient Greece. The design detail of mouldings and decoration are based on 19<sup>th</sup> Century European pattern books. This old design wisdom continues to give aesthetic pleasure and charm. Over time, owners renovate and embellish their homes in the own cultural traditions creating the rich tapestry of who Wellingtonians are.

## LIVING WITH OUR PAST

6. Living in an old house allows a gleaning of the experience of our ancestors. This is an intangible gift of a sense of identity and belonging. Smaller houses speak of a time when life was materially simple and sustainable. Ones clothes filled a single wardrobe. Kitchens were simply a kauri sink-bench, a stove, a safe to keep milk and vegetables cool, a dresser for crockery and cutlery and a central table. The table doubled as a work surface and the family gathering place. This simplicity is close to the minimalism that is aspired to today. This heritage embodies values of sustainability and should be treasured for passing on to next generations.

## PROTECT HERITAGE LISTED SITES AND AREAS PART 3.32(1)(a), (e) & (h) NPS-UD

7. HPW is ready to contribute constructively to the identification of heritage sites suitable for specific listing and protection both within and outside of inner city heritage suburbs. That relates to the identification of “qualifying matters” under Part 3.32(1)(e) National Policy Statement Urban Development 2020 (NPS-UD).
8. HPW supports the retention of all listed properties, except those which clearly merit removal (such as 128 Abel Smith St).
9. HPW proposes the introduction using Part 3.32(1)(a) and (e) NPS-UD of
  - Stepped down levels of intensification next to low rise Heritage sites and areas, including residential heritage suburbs
  - Transition zones adjacent to sites of significant historic heritage;



*Plimmer House surrounded by tall buildings*

- 100 meter buffer zones around those sites; and

- The protection of views of major heritage buildings. For example, views towards the Carillon, St Gerard's Monastery and other publicly enjoyed built heritage.



10. HPW supports the retention of heritage listing for groups of business buildings within heritage suburbs. Those areas together with school sites were the heart of the inner city heritage suburbs.

11. HPW supports the re-purposing of those buildings to residential ground floor use. For example listed shops in Aro Valley, or Newtown may be appropriately re-purposed while maintaining the large front window heritage style of past use.



12. HPW does not oppose the building of adjacent higher buildings accessed through heritage area business buildings. Good design could ensure the integrity of the heritage building is maintained while utilising the rear of those sites for more intensive re-development. For example in Newtown, shops and two storey frontages

might have re-developed adjacent back buildings which involve higher buildings set back from the front shops.

13. HPW opposes the retention of only the facade of such buildings, however.

14. HPW supports three-storey buildings in the historic business areas between heritage listed buildings with provisos and consideration of the heritage context of the area.

### **PROTECT INNER CITY "HERITAGE" SUBURBS NPS-UD PART 3.32(1)(a), (e) AND (h)**



15. HPW is opposed to the Draft Spatial Plan proposals relating to the inner city suburbs of Mt Victoria, Thorndon, Aro Valley & The Terrace, Mt Cook, Newtown and Berhampore. (Aro Valley includes Holloway Rd). HPW refers to those suburbs in this submission as "heritage suburbs".

16. It is important to consider the extent to which WCC is required to intensify those suburbs under NPS-UD. HPW explored this issue with the Ministry for the

Environment (MfE), the administrating Government department (F Wong/K Guerin meeting 2 Oct 2020). MfE advise that there is a discretion on WCC's part relating to the treatment of heritage and/or character (under Part 3.32(1) NPS-UD).

17. HPW proposes that the inner city heritage suburbs be treated as collections of buildings which represent historic heritage ("qualifying matters" under Part 3.32 (1)(a) NPS-UD) but which individually may not warrant scheduling as significant historic heritage places or areas of "qualifying matters" under Part 3.32(1)(e).
18. This "heritage" is currently recognised in the District Plan by a number of rules and provisions relating to heritage and character within the "character areas". WCC has a discretion as to how it treats these suburbs in terms of implementing the required intensification under NPS-UD. It is not required to use only Part 3.32(1)(h) to identify the "qualifying matter" applicable to some or all of those suburbs as "character". HPW notes therefore that WCC may exercise its discretion to completely exempt these suburbs from intensification on the basis of their status as "qualifying matters".
19. The housing stock is already characterised by closely developed stand-alone houses, often on small sites, with minimal yards and little provision for off street parking. These suburbs are the original "walkable" 15 minute suburbs, most of which still do not rely on vehicle transport more than 140 years after their establishment.
20. The protection of historic heritage is a matter of national importance and in this regard the Council should continue to approach the future planning of the suburbs from the perspective of protecting, enhancing and promoting them as valuable heritage assets. That policy approach should not be abandoned in favour of the radical erasure of Wellington's heritage and identity.
21. The recognition of "heritage status" under Part 3.32(1)(a) NPS-UD is proposed by HPW for all of Thorndon, Mt Victoria and Aro Valley, including Holloway Rd. The revised housing assessment of future demand can be met within the existing District Plan rules for those suburbs. Much of Mt Cook, Newtown and Berhampore could also enjoy similar heritage overlay and accommodate demand levels with smaller areas of intensification as designed by the communities themselves.

## **DEMOLITION CONTROLS**

22. The requirement under District Plan Rule 5.3.6 (etc) to obtain a resource consent prior to demolition of a pre-1930 building in those suburbs is the key provision protecting the heritage (and character) of them. The heritage element of the buildings and their character is entwined and cannot artificially be separated. HPW regards these suburbs as heritage suburbs with significant heritage value which merits recognition as a "qualifying matter" under Part 3.32(1)(a) of the NPS-UD.
23. HPW also supports the continued recognition of all inner city heritage suburbs as character areas with specific rules relating to them in the geographic areas covered under existing District Plan provisions.

24. HPW calls for the retention over all inner city heritage suburbs of protection provided by the rule requiring a resource consent prior to demolition of pre-1930 buildings. The demolition control rule has worked well to preserve the character and heritage of old houses in those suburbs
25. The demolition control is not a rule prohibiting demolition but a rule which requires good process and all the facts to be considered. HPW believes the rule has been badly implemented by WCC which has not applied its discretion appropriately.
26. HPW notes areas proposed for removal from demolition protection are as follows:  
PERCENTAGE DIFFERENCE
- Aro Valley 73%
  - Berhampore 85%
  - Mt Cook. 57%
  - Mt Victoria. 62%
  - Newtown. 73%
  - Thorndon. 59%
  - The Terrace 100%
  - Holloway Road 100%
27. HPW opposes the proposal to remove from such large areas the demolition controls and draws attention to the Boffa Miskell report of February 2019 which found that 70-80% of the buildings in these suburbs are either “positive” or “contributing” to the suburb’s intact character. HPW opposes the reduction in coverage of protection in sub-areas to an average of only 20-30% of the suburbs proposed by the DSP.
28. HPW notes the Boffa Miskell report relating to areas retaining demolition controls should be much wider. At the very least the Character sub-areas should accord to those proposed in the Boffa Miskell report. HPW draws attention to the specific extended sub-area proposals in Heritage New Zealand Pouhere Taonga’s submission in that regard.
29. The scale of the proposed removal from protection of old houses is completely unacceptable and fully rejected. HPW objects to the removal of The Terrace and Holloway Rd from Character Area status. HPW objects to the removal of Character Area status from Selwyn Terrace, Hobson St and Cres, and Portland Crescent in Thorndon. HPW supports the addition of Character Area status to Bolton St, Kinross St and Easdale St.
30. HPW opposes shifting the focus of rules applicable in the inner city suburbs to substantially limited matters related to residential character and amenity value such as streetscape which results in a few small areas and discreet streets (identified as “character sub-areas”) being proposed for exemption from intensification under NPS-UD Part 3.32(1)(h).





31. Such treatment negates arguments supporting the protection of heritage and favours the development of more intensive forms of housing in areas outside of character sub-areas but within “character overlays” in the wider heritage suburb area.

32. HPW opposes the range of measures promoting new housing development in these heritage suburbs until the detailed District Plan draft rules are available to be considered. It is not possible yet to evaluate the full impact of the DSP. Encouraging denser housing forms will result in the ongoing loss of valuable heritage housing stock and the erasure of the character of Aotearoa’s oldest suburbs.



33. Local residents of heritage suburbs highly value character (e.g. streetscape, proximity to historic business areas, sites of significant historic heritage, historic schools, existing medium dense mixture of housing choices, one- or two-storey homes, safe streets, open spaces behind dwellings, access to and enjoyment of sunlight, etc), all of which should be retained.

## ENVIRONMENTAL BENEFITS OF HERITAGE

34. HPW believes that retaining older buildings is essential to making urban environments more sustainable. International research has identified that nearly 40 percent of all greenhouse gases are produced in the construction, demolition and operations of buildings. Most new buildings erected in the present are built for a 50-year lifespan, meaning they will not survive long enough to repay the amount they cost in carbon to construct.
35. Conversely, preserving older buildings contributes to climate change solutions by storing energy (often called embodied energy) and becoming carbon reservoirs. Demolishing buildings intensifies landfill pressures and increases demand for finite raw materials to create new building products. As the American architect and sustainability expert Carl Elefante famously put it: ‘We cannot build our way to sustainability; we must conserve our way to it.’ This means moving away from the mindset that ‘new is always better’ to ‘recycling comes first’. Adaptive re-use rather than demolition should be our first impulse.
36. HPW acknowledges that retaining every building in the existing character areas is not practicable if intensification is to occur in sustainable ways, but we also want to ensure that every effort is made to avoid unnecessary demolition or wasting of building resources. The sub-character areas identified in the DSP should therefore be extended to realise both aims.

## QUALITY BUILT ENVIRONMENT



37. Rather than copying housing solutions from larger and different types of cities, Wellington should be more innovative and devise answers appropriate to the scale of the future need and that fit with the communities in heritage suburbs. Apartment blocks as adopted in Melbourne or Portland are not appropriate for heritage suburbs. Design must reflect the context of the local heritage area.

38. Existing District Plan rules and their enforcement do not protect residents from inappropriate development now. This requires urgent attention and Council needs to demonstrate it can effectively manage existing rules before considering a different set.

39. A tiny percentage of all building consents have reached the threshold in a development needed before a resource consent is required. As a design assessment can only be required on resource consent applications nearly 99% of all building consents will not be subject to design assessment unless they fail one or more development rules. Coverage, height to boundary, yard and other controls are all signalled to be significantly relaxed. HPW doubts design guides will protect heritage context in inner city heritage suburbs.

## COMMUNITY COLLABORATION/CO-DESIGN

40. The planning process needs to take into account the whole suburbs and their infrastructure needs and be undertaken in collaboration with the communities concerned. That should culminate in a holistic plan for the future of the inner city heritage suburbs. Only then should a Design Guide be developed (not the other way around as is proposed). Council's claims that there will be high levels of design control are illusory given that in the great majority of residential developments the level of design control (including development rules) will be reduced.

## PLAN FOR PHASED INTENSIFICATION

41. HPW supports housing choice and supply solutions that best meet the current and future needs of the community but opposes inappropriate subdivision and development at the expense of heritage (s.6(f) RMA).

42 In the absence of strategic material about infrastructure, transport, schools, and health care provision, required by NPS-UD, the DSP is nothing more than a policy for city rezoning, which includes deregulation of building height limits and removal of process controls for demolition in heritage suburbs.

- 43 NPS-UD requires intensification to be planned in the short, medium and long terms (Policy 7). Supporting documents have not been so prepared. HPW calls for phased rezoning of the city. This would result in areas identified for immediate transformation (working with the development sector as mandated in Policy 10(c) of NPS-UD), areas for development in the medium term and then long term respectively. The phasing should be “triggered” by review of actual population trends and by updating the HBA as required by NPS-UD.

## RIGHT SIZING CITY CENTRE ZONE

- 44 NPS-UD makes certain requirements for intensification within a “walkable catchment” of the city centre. For the purposes of NPS-UD the city centre zone should be the geographic zone currently identified in the District Plan as the “high city”. The “low city” should be outside that zone and should be a residential zone within its “walkable catchment”. This aligns with current 6 storey provision for intensification in the low city.



- 45 Furthermore, the city centre should have a number of distinct smaller precincts within it in order to better plan intensification along with community needs such as green space, and local infrastructure. It is unacceptable that sewage is removed from holding tanks in apartment blocks now because underground sewage systems cannot currently cope with additional loading (e.g. the Sharp Building in Taranaki St - Councillor Young, Thistle Hall 25 Sept 2020).

## PHASE FOR RAPID TRANSIT DECISIONS

- 46 There is no current agreement about the location of planned rapid transit within Wellington in terms of NPS-UD Policy 3(c)(i). There have been discussions and feasibility studies for many years about general direction (through Newtown or Mt Victoria) but no decision. It is reasonably foreseeable that there may not be rapid transit in Wellington because of cost/benefit realities.
- 47 In the absence of a decision about the specific direction of rapid transit, there is no “planned” rapid transit stop within the terms of NPS-UD. Accordingly any proposed intensification should only be “triggered” once such a decision is made. Proposing deregulation of building heights because of non-existent planned MRT stops is therefore inappropriate.
- 48 Both Newtown and Berhampore are heritage suburbs. Newtown should not therefore be subject to intensification of at least 6 storey buildings in the short term, unless in a carefully contained manner. For example, as proposed by architects Hanley-Welsh which provides an additional 2000 plus homes without unduly affecting residential heritage areas. HPW supports collaboration with heritage suburb residents in developing such plans.





49 WCC has advised that “Berhampore has been identified as a good place for intensification because of its proximity to the Programme Business Case MRT route through Newtown, proximity to Newtown centre and services, and its straightforward transport route to the central city”. However, there is no requirement for at least 6 storeys in Berhampore which is not within a “walkable catchment” of either a city centre or any planned rapid transit stop. There is accordingly no justification for Berhampore intensification to the extent proposed.

*Hanley-Welsh Intensification Plan for 2000 plus units, Newtown Sept 2020*

### NPS-UD 2020 NON COMPLIANCE

50 The RMA obliges the Council to give effect to higher order planning instruments (e.g. national policy statements). The NPS-UD contains important direction which WCC is not complying with.

51 HPW objects to the assumption used in both the DSP and the online public consultation form, of the highest population projection provided for Wellington over 30 years (80,000). HPW notes the NPS-UD requirement to plan using “most likely” assumptions (Part 3.24(5)(c) & (d)).

Statistics NZ places a 50% probability on growth being 46,000 pre-COVID but only a 10% chance it would reach 80,000. The figure used should be 46,000.

52 HPW requests that the short and medium projections be further re-calibrated in light of the changes from COVID. Evidence about increased demand for Kapiti and Hutt Valley property needs to be considered post-COVID through the preparation of a regional housing bottom line, prior to preparation of a Housing and Business Land Assessment for Wellington (HBA) in accordance with NPS-UD Part 3).

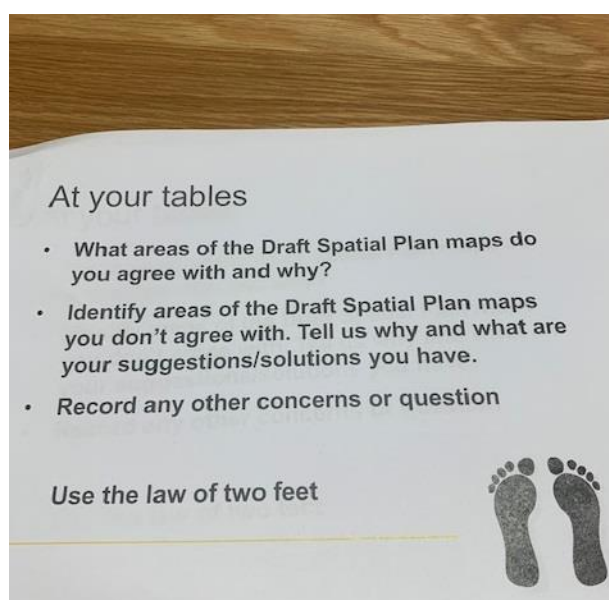
53 A Future Development Strategy is also required to be completed by NPS-UD (Part 3.12). To adopt the DSP about intensification in advance of those analyses constitutes a failure under s.83 LGA. The hasty attempt to superficially meet NPS-UD 2020 height limit requirements resulted in a DSP which grossly over provided for capacity. HPW understands it provides 7 times the amount of capacity required under NPS-UD 2020. A crude estimate is that upzoning in Newtown alone would provide more than 30,000 additional units in that one suburb. HPW has requested

modelling of capacity provided by DSP but been declined that fundamental information.

- 54 Following the experience with preparation and adoption of the Auckland Unitary Plan, improvements were made by NPS-UD 2020, in particular the identification of matters which would qualify for exemption from intensification. Those matters include heritage under NPS-UD Part 3.32 (1)(a) and (e).
- 55 Other matters (e.g. character and amenity) may be exempted under Part 3.32(1)(h) but require site by site identification. WCC has not identified all qualifying matters under NPS-UD 2020, and has wrongly used Part 3.32(1)(h) for matters relating to heritage. It should use Part 3.32(1)(a) and (e) in addition to Part 3.32(1)(h) in relation to intensification in inner city heritage suburbs. See below for further discussion of this point.

### LOCAL GOVERNMENT ACT CONSULTATION NON COMPLIANCE

- 56 HPW has significant concerns about the quality of the consultation process and the flawed and leading WCC submission form. Primary use of web based materials is not resulting in sufficiently widespread availability of information to meet the principles of Local Government consultation (s.83 LGA). Advice to persons affected has not been given in an accessible manner and should have been included in rates notices. Engagement has not complied with WCC's engagement policy. HPW members have actively provided information to residents to remedy WCC's consultation shortcomings by printing maps and information brochures and delivering them to households in inner city heritage suburbs.
- 57 The status of the DSP has been unclear as regards the requirements of the National Policy Statement on Urban Development (NPS-UD 2020). HPW relies on Moana Mackie's advice of 11 September 2020 that it is a policy document.



*Wellington Residents Association Network at WCC, 26 September 2020*

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [14645](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** James Graham

**Suburb:** Te Aro

## 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?**

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?**

Neutral

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

I don't disagree, but I would like to say that I am strongly in favour of allowing these 80,000 people to live where ever they feel is best for them. To do this, housing supply must be made flexibly available where ever and whenever these people choose to move to these locations. How is that to be accomplished? By making new housing construction as easy and cheap as possible. To that end, I am strongly in favour of allowing for \*more\* intensification in \*all\* of Wellington's current neighborhoods.

**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?**

Absolutely nothing. Housing character only matters to a handful of people, and it often matters to them in ways that are actively harmful to low-income households that desperately need access to housing. In the inner city, the new proposal is to allow for minimum 6-story houses/units. That means that for every pre-1930s house that is preserved in inner city suburbs, 5 or more households miss out on living in that area. Who do we care more about? The three wealthy folk who favour special character? Or the 5 poor households that can't afford or find a home in the central city? I come down strongly in favour of those households. If that means giving up on preserving "special character", then so be it.

I strongly disagree with special character zones, and would favour abolishing them altogether.

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

Access to public transport, Commercial activity (retail, cafes, local businesses), Infrastructure (stormwater, water supply, wastewater), Walkability within the centre, Easy walking distance to the centre

**Other:** Fully flexible land supply is a vastly under-appreciated amenity. I like variety, and I like that people have the flexibility to provide it. The only way to do that is to allow for mixed-use areas across the city, and to let land-owners and developers fig

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

New housing

**Other:** New housing. New housing. New housing.

You *have* to get this right. If Wellington is going to keep its green spaces, and if we do not rapidly intensify the central city, then we need to allow for people to live near where transport can bring them to

**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?**

Not sure.

**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?**

I like that there is a lot of focus on housing intensification. This is a great way of maintaining Wellington's green spaces, but allowing for a lot more housing. If recent rental price and house price increases are any indication of the future, housing i

**2. What would you change or improve?**

Far too much of the central city has been designated as a &quot;special character area/sub-area&quot;. For example, large parts of Aro Valley, Mount Cook, Thorndon, Newtown, and Mount Victoria are designated as such. This is likely to significantly hamper new housing development, as it will prevent demolitions of smaller, older, and low quality housing. As many of these suburbs are also in areas set to allow more intensive housing construction, the simultaneous special character area designations drastically limit the benefits of allowing for intensification. If developers cannot demolish old housing stock and replace it with new, dense, high quality housing, we will not be able to provide the additional housing required to house the projected 80,000 people coming to Wellington in coming years.

3.

4. As I have mentioned elsewhere in my submission, I strongly favour and recommend removing special character housing areas altogether. These character areas largely benefit existing home owners in the form of rising house prices (since the special area designations restrict housing supply in these areas). That means that current homeowners in these areas receive large gains in their housing wealth at the expense of current and future households that might have lived in these areas. There is absolutely no reason to favour existing homeowners in this way. Abolish the special areas, massively ease housing supply restrictions, and allow for the construction of the affordable housing you claim you are promoting in this Draft Plan.

**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. The construction of new housing supply is slow. It can take years or decades for before we observe a significant increase in housing supply in a given neighborhood. Meanwhile, changes in housing demand can occur quickly. The projection of 80,000 additional households in the next 30 years could turn out to be far too low. In that case, housing demand will rapidly outstrip the extra housing supply you have allowed for in the Draft Plan. And in that case, housing affordability will get significantly worse.

6.

7. I suggest you plan as if housing demand could increase by more than double your current forecasts. That means, plan as if wellington is going to grow by 200,000 people in coming years. That means a lot more housing construction than you are currently allowing for in the city. What if you are wrong and housing demand is much lower than forecast? Then house prices and rents fall somewhat, and housing \*actually\* becomes more affordable in Wellington (instead of the &quot;worsening affordability at a slower rate&quot; that you are currently planning for). There is absolutely no downside to providing for more housing construction than you think you will need.

**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 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 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.**

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).**

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**

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?**

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?**

No

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

**Other:** New housing. New housing. New housing.

You *\*have\** to get this right. If Wellington is going to keep its green spaces, and if we do not rapidly intensify the central city, then we need to allow for people to live near where transport can bring them to

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

By far the biggest problem facing New Zealand (and many other places in the world) is a lack of flexible housing supply. Far too many cities get this wrong by emphasizing the protection of existing housing, rather than allowing for a significant increase in new construction. Wellington has a chance here to buck that trend and provide far more housing than has previously been allowed. Please work on getting this right by focusing on the following:

- Far more intensification
- Far less protection for existing &quot;special character areas&quot;

**Have you provided an attachment?** No



**From:** James Kennelly [REDACTED]  
**Sent:** 05 October 2020 17:05  
**To:** BUS: Planning For Growth  
**Cc:** Nicole Ramage; Paul Robinson  
**Subject:** Property Council NZ submission on the draft Spatial Plan  
**Attachments:** Property Council NZ Submission - Draft Spatial Plan for Wellington City.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

To whom it may concern

Please find attached Property Council's submission on the draft Spatial Plan for Wellington City.

If you have any questions please don't hesitate to contact me.

Kind regards  
James

**James Kennelly**  
Head of Advocacy  
PROPERTY COUNCIL NEW ZEALAND

[REDACTED] | [www.propertynz.co.nz](http://www.propertynz.co.nz)



**TOGETHER SHAPING CITIES WHERE COMMUNITIES THRIVE**

*This message and any file attachments may contain CONFIDENTIAL and / or LEGALLY PRIVILEGED information and is intended only for the use of the addressee named above. If you are not the intended recipient of this message, you are hereby notified that any use, distribution, reproduction or dissemination of this information and the copying of the document is strictly prohibited. If you have received this message in error please notify the Property Council of New Zealand Inc immediately by return email or by telephone on +64 9 373 3086. The costs of doing so will be met by the Property Council of New Zealand Inc. The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Property Council of New Zealand Inc. Nothing in this email constitutes a designation of an information system for the purposes of the New Zealand Electronic Transactions Act 2002.*





5 October 2020

Wellington City Council

Email: [planningforgrowth@wcc.govt.nz](mailto:planningforgrowth@wcc.govt.nz)

## Draft Spatial Plan for Wellington City

### 1. Recommendations

- 1.1 Property Council New Zealand's Wellington Branch ("Property Council") recommends that Wellington City Council ("the Council") agree to the draft Spatial Plan. We support the intensification of the central city, inner and outer suburbs while also supporting greenfield developments.
- 1.2 To ensure the city growth, we also recommend the Council consider the following when developing its District and Long-Term Plans:
- Work with central government, Greater Wellington Regional Council and other Councils within the Wellington Region to fully integrate the Spatial Plan into a Future Development Strategy.
  - Provide increased investment in infrastructure especially three waters and transport to help accommodate the intensification of Wellington.
  - Work with central government to ensure there is capacity for shops, schools and health services to promote investment in the growth of suburban centres.
  - Create an Urban Design Panel which is empowered to provide independent design reviews of significant private and public projects across Wellington.
  - Work with central government, the property sector and insurers to find solutions to the rising cost of insurance.
  - Consider the risk profile of buildings when defining character areas and listing heritage protection.
  - Utilise the new powers under the Infrastructure Funding and Financing Act 2020 to help fund the required infrastructure in greenfield developments.

### 2. Introduction

- 2.1 Property Council's purpose is; "Together, shaping cities where communities thrive". We believe in the creation and retention of well-designed, functional and sustainable built environments which contribute to New Zealand's overall prosperity. We support legislation that provides a framework to enhance economic growth, development, liveability and growing communities.
- 2.2 Property Council's Wellington Branch has 138 businesses as members. The Property Industry contributed \$8.6 billion to the Wellington Economy. This includes a direct impact of \$3.3 billion (11 per cent of total GDP) and flow-on (indirect and induced) impacts of \$5.3 billion. It employs 17,260 directly which equates to eight per cent of total employment in Wellington. That makes it the region's second largest economic sector.



### 3. Overview

- 3.1 Property Council supports the draft Spatial Plan in principle. However, more can be done to deliver quality urban environments and make room for growth. The Wellington region is lagging behind other regions such as Canterbury and Waikato with new dwellings consented. Recent Stats New Zealand data show that Wellington had only around 3,163 dwellings consented compared to 5,653 in Canterbury and 4,105 in Waikato.<sup>1</sup>
- 3.2 The Spatial Plan does not address in sufficient detail the inter-relationships with the Wellington Regional Growth Framework, Let's Get Wellington Moving or the other Council's district plans within the Wellington Region. We believe this could be addressed by a more fully integrated Future Development Strategy as outlined in the National Policy Statement on Urban Development (NPS-UD). Over the long run, the issue that dominates Wellington is the perceived risk of a major earthquake. Because the epicentres of Porirua, Wellington and the Hutt Valley are all about 20km apart, it is unlikely that the event will affect all three centres with the same severity. The best way to minimise the overall risk is to balance residential and commercial activity across the three centres. Strong commercial centres in the Hutt and Porirua will not only reduce overall seismic risk but will also potentially reduce pressure on traffic and infrastructure.
- 3.3 We agree that more development is required to cater for the expected population growth, and that it should be good quality and in the right locations. However, to achieve this the Council should allow for increased intensification in the central city, inner and outer suburbs while also supporting greenfield developments in Upper Stebbings Valley, Glenside West and Lincolnshire Farm.
- 3.4 Businesses need clarity and certainty. The Plan must thus communicate clear principles so that developers, contractors, planners and council officials have a sound understanding of where specific rules have emanated from and what their intentions are. It is also important for economic feasibility to be accounted for. Otherwise, development will not take place.
- 3.5 Planning decisions can sometimes be about balancing trade-offs and weighing up development against those trade-offs. For development to move fast, the property sector requires certainty. In addition, the costs and benefits of urban development need to be considered when making decisions on consent applications. If the Council wants to achieve the number of houses to meet the anticipated growth then it needs make tough decisions and support developers in what they do best, build.

### 4. Central city

- 4.1 We support the proposed intensification of the central city to enable more residential and commercial development. The Council must continue to encourage a central city which consists of a 'compact' commercial core while encouraging increased residential development. This will help increase footfall in the main shopping areas along the golden mile, especially in evenings and weekends.

---

<sup>1</sup> Building consents issued: August 2020. Retrieved from <https://www.stats.govt.nz/information-releases/building-consents-issued-august-2020>



- 4.2 Parks, convenient transport links, general layout, safety, and proximity to recreational activities, shops, schools, health services and community infrastructure are all fundamental factors which determine where individuals decide to live. It is therefore vital that the Spatial Plan facilitates the provision of these in identified growth areas and serves as a catalyst for mixed-use development. Te Aro has a lot of potential in this regard.
- 4.3 The Council needs to consider a number of other issues when deciding on how to intensify the central city area. The rising cost of insurance for high storey buildings is affecting the demand for multi-unit apartments requiring higher building standards to mitigate earthquake and climate change risks. The social implications of mandating high cost design and high occupancy cost could further exacerbate the economic divide. This is compounded by the need to upgrade an already under-developed infrastructure to meet the requirements of increased density in the central city. The Council must work with central government and the property sector to find the best solutions to these issues.
- 4.4 With regards to Pipitea, we believe Council should work Centerport, Kiwirail, Greater Wellington Regional Council and Central Government to assess what is the best use of the land given that much of the area is currently under-utilised. Options that could be considered are whether some elements of the railyard and port (like the maintenance yards and workshops) could be moved to places in the wider Wellington region thus freeing up some land for both residential and commercial development.
- 4.5 We have some concerns with the proposal to develop guidance to encourage better apartment design. While we support the overall intent of these recommendations, we are concerned that the guidance might be too prescriptive and create perverse outcomes by discouraging innovation. Consistent rules provide certainty which is important for development. However, they also provide little flexibility which results in poor overall urban design and loss of potential amenity values.
- 4.6 We recommend that the Council creates an Urban Design Panel which is empowered to provide independent design reviews of significant private and public projects across Wellington. The Urban Design Panel would provide preapplication recommendations to developers and Council representatives on private and public developments. This would be a step towards strengthening the process for delivering design excellence in Wellington. A good example of this is Auckland Council's Urban Design Council which plays a key role in improving the quality of the built environment across the Auckland region. We support good urban development, rather than restricting or constraining it.
- 5. Inner suburbs**
- 5.1 The inner suburbs are an attractive place for further development as they are readily accessible, with good connections and close to existing and future public transport routes. In addition, they are generally less vulnerable to natural hazard risks. If the Council wants to meet the housing supply that Wellingtonians demand and allow much needed development to increase density, it should reduce the current restrictions around character areas..
- 5.2 With Let's Get Wellington Moving, the Council has an opportunity to concentrate future development in areas along existing bus routes and around the proposed mass rapid transit route. Both Mt Cook and Newtown are areas which are ripe for increased density. However the Council must invest in infrastructure to service the future needs within these areas.





### *Heritage protection and character areas*

- 5.3 While we commend the Council on trying to balance the interests of preserving the character of the inner suburbs, continuing to place restrictions in these areas will only lead to more impediments on increasing the supply of housing close to the central city.
- 5.4 Wellington has a number of beautiful buildings, which reflect our history and therefore require protection. However, to date, judgments on the listing of heritage buildings and defining character areas have been based on aesthetics and historical factors. The risk profile of the buildings and the economic implications of strengthening to enable retention have not been adequately regarded. Given the significant costs involved in strengthening our building stock, there needs to be far more careful consideration of the extent to which district plans will seek to retain these buildings. Unrealistic expectations on heritage buildings and character areas will have significant detrimental impacts on both the local community and building owners.
- 5.5 Where it is in the community's interest to strengthen (rather than demolish) an earthquake-prone building, but it is not economic from the landowner's perspective, the community should be prepared to make a financial contribution to make strengthening viable. In the absence of such a commitment, it is questionable whether the community truly values the building, and unreasonable for the regulatory regime to require uneconomic upgrading from owners. As such, demolition ought to be enabled and the building should no longer be classified as heritage.

## **6. Outer suburbs**

- 6.1 To fully meet the growth pressures facing Wellington over the next 30 years the Council cannot just rely on intensifying the central city and inner suburbs. There is an opportunity to utilise transport corridors to intensify in the key centres of the outer suburbs. It also supports the resilience of the city as many of these suburbs have a lower level of natural hazard risk relative to other parts of the city. Places like Johnsonville offer an opportunity for more intensive development especially around the mall.
- 6.2 To achieve further intensification in the outer suburbs there will be a need for increased investment in infrastructure, especially three waters and transport. However, the Council must provide open space for parks and recreational areas while working with central government to ensure there is capacity for shops, schools and health services to promote investment in the growth of suburban centres. Intensification is the only way of achieving this goal given the land constraints within these suburbs.

## **7. Opportunity sites**

- 7.1 Intensification alone will not solve the growth pressures in the city. The Council must allow for some greenfield development in Upper Stebbings Valley, Glenside West and when infrastructure permits in Lincolnshire Farm. It must also develop a framework for the future of the Miramar peninsula and the regeneration of Strathmore Park.
- 7.2 Both Upper Stebbings and Glenside West are well placed for future development as they are in close proximity to shops and services in Tawa and Churton Park as well as transport links at Takapu train station and the State Highway interchange at Westchester Drive. We support the Council's work on a masterplan to develop these new communities.
- 7.3 The Council must work with the landowners (both private and public) to put in place a clear and consistent plan to provide the necessary infrastructure to accommodate this growth.



Development contribution policies can either enable or stifle growth. The Council must be wary of placing too much onus on the industry who are building the necessary residential and commercial developments. Furthermore, we recommend that the Council investigate using the new powers under the Infrastructure Funding and Financing Act 2020 to help fund the required infrastructure.

7.4 With Lincolnshire Farm, further work is required. We support the Council's plans to review the Structure Plan and work with central government to ensure that any future development is aligned with plans for a Petone to Granada link road.

## 8. Conclusion

8.1 We commend the Council on developing a very thorough draft Spatial Plan. While the intentions are good we hope that it is not watered down by the different interest groups who seek to protect their areas to the detriment of wider society. For the city to grow there needs to be a strategic approach which encompasses all areas so as not to restrict development and allow for a variety of different buildings typologies.

8.2 Property Council wishes to thank the Council for the opportunity to submit on the draft Spatial Plan. We would like to speak in support of our submission at an oral hearing.

8.3 Any further queries do not hesitate to contact James Kennelly, Head of Advocacy, email:

[REDACTED]

Yours sincerely,

*Paul Robinson*

Paul Robinson  
Wellington Branch President  
Property Council New Zealand

[REDACTED]

---

**From:** Kenny Clark [REDACTED]  
**Sent:** 05 October 2020 13:16  
**To:** BUS: Planning For Growth  
**Cc:** Fergus Grenfell; Joshua Tan  
**Subject:** Submission from Wgtn Chamber of Commerce on draft spatial plan  
**Attachments:** 20201005 Wellington Chamber of Commerce submission on Spatial Plan.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Good afternoon,

Please find attached a submission from the Wellington Chamber of Commerce on Wellington City Council's draft spatial plan 'Our city tomorrow'.

Any questions or comments, please let me know.

Kind regards  
Kenny

Kenny Clark  
Director | [REDACTED]  
166 Featherston Street, Wellington, 6011



5 October 2020

Wellington City Council  
Via email: [planningforgrowth@wcc.govt.nz](mailto:planningforgrowth@wcc.govt.nz)

## SUBMISSION ON 'OUR CITY TOMORROW: DRAFT SPATIAL PLAN'

### INTRODUCTION

1. Thank you for the opportunity to submit on the Wellington City Council's 2020 Draft spatial plan 'Out city tomorrow'. The Chamber has consistently worked hard to ensure the city's business community has a voice in city matters, and spatial plans are an essential part of this.
2. The Chamber would welcome the opportunity to discuss this submission with the Council.

### ABOUT THE CHAMBER

3. The Wellington Chamber of Commerce ('the Chamber') has been the voice of business in the Wellington region for 164 years since 1856 and advocates for policies that reflect the interest of Wellington's business community, in both the city and region, and the development of the Wellington economy as a whole. The Chamber is accredited through the New Zealand Chamber of Commerce network and as part of our broader organisation is also one of the four regional organisations of BusinessNZ.
4. Through our three membership brands, the Wellington Chamber of Commerce, Business Central and ExportNZ, our organisation represents around 3,500 businesses across the central and lower North Island. Our organisation is one of the four regional organisations that make up the Business New Zealand family and is also accredited through the New Zealand Chambers of Commerce network.

### SPATIAL PLAN

5. Overall, 'Our city tomorrow' is a welcome guide to Wellington's development over the next 30 years. It makes the kind of decisions the Chamber has been calling for to cater for growth and provide specific direction on where future investments will be required in things like transport infrastructure, water provision, and civic amenities to support new housing. The document successfully sets the entire city's development within a long-term framework that grapples with the issues of a growing population and bustling central business district.
6. The draft spatial plan has a welcomingly explicit focus on affordable housing. While housing affordability in New Zealand is the subject of numerous reports and studies, we can agree there is insufficient housing stock. Constrained supply has led to rising prices, leading to Wellington families either diverting too much of their income towards housing or not having the choice to buy the house they would like. Therefore, any spatial plan must allow for the building of



thousands of new homes to accommodate present and future citizens. 'Our city tomorrow' does this successfully in our view.

7. Housing supply is more than just a dwelling. It is about providing a warm, dry, secure home that is built to modern standards and is better for the environment. Also, as the plan seeks to encourage, it should look good within its surroundings for decades to come.
8. The Chamber has sounded the alarm on housing affordability previously. Addressing it requires urgency from all parties. Wellington is already behind on the number of houses it needs, let alone catering for growth into the future.
9. Therefore, the Chamber supports removing controls on pre-1930s housing redevelopments. The space within our central suburbs and along key transport corridors must allow as many people as possible the choice of living close to Wellington's fantastic amenities. Providing for more significant development does not mean abandoning Wellington's past, and the proposed heritage protections in this plan strike the right balance.
10. Ultimately, a city's task is to house its people affordably and safely. Standing in the way of redeveloping our old, pre-1930s housing stock, often single dwellings on a large site, into modern medium-density developments will adversely impact those least able to afford it.
11. If anything, the Council should push further on zoning changes to redevelop the central business district and surrounds. Primarily, the southern Te Aro area is suitable for even higher-density residential and commercial buildings than proposed. For example, the areas along Kent and Cambridge Terraces and the northern portion of Adelaide Road are currently proposed to move to 6-10 stories. We consider this area capable of accommodating more than the current collection of vehicle dealerships, which are useful businesses but do not require the conglomeration of services that business districts provide. We recommend increasing the height limit in this zone to a maximum of 15 or 20 stories to cater for more housing stock and inner-city living. It is particularly suitable for greater density because it lies on a main public transport corridor and close to Wellington Hospital.
12. There is a need for the Council and councillors to show leadership to speak up for and foster developments to complement the effort that has gone into the spatial plan. Robust public debate around the contents of the spatial plan is encouraging. Much has focused on the heritage provisions within the plan, and the Council has done well to debate and explain the trade-offs it is making to benefit current and future Wellingtonians. Equally, the Council must translate this leadership into facilitating specific developments that build neighbourhoods. For example, Shelley Bay is a proposed development seeking to house hundreds of people. If medium-density developments like this are unable to get off the drawing board easily, it will depress growth citywide.

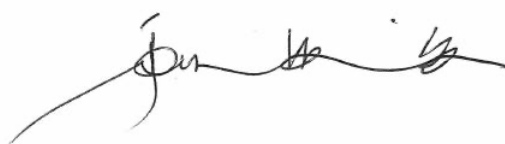
#### **IMPLEMENTATION NEEDS TO FOLLOW STRATEGY**

13. The spatial plan provides a strategic guide for the city, but the Council is still required to implement the supporting work to ensure the spatial plan succeeds.
14. People living in housing developments need transport. The spatial plan strongly links itself to the Let's Get Wellington Moving transport plan; unfortunately, this plan is flawed. As is well known, Wellington's growing population has led to rising traffic congestion and longer commuting times. Areas in the central city as well as around the port and airport are particularly problematic.

Public transport is straining, trains are reaching capacity, and the bus reforms have been a debacle. Unfortunately, Wellington has been let down by the central government as well as our lack of vision.

15. There is a risk if Wellington's housing plans rest on Let's Get Wellington Moving as it currently stands. Therefore, the Chamber strongly recommends a rethink and renegotiation of the programme. There is now an opportunity to redo the deal because, due to Covid-19, the government is looking for significant productivity-enhancing infrastructure developments it can fund to stimulate the economy. Wellington must take advantage of this opportunity and secure its fair share of stimulus funding. It is also a chance to make the city's transport flows more efficient and facilitate greater public transport development. This will be essential to ensuring reliable, consistent transport options service the city's housing developments well.
16. Another issue requiring addressing to meet the city's housing goals is insurance. People will not move into high-density urban housing if they cannot get affordable insurance for their property. In recent years, apartment owners in the city have seen their building insurance premiums doubling, tripling or even quintupling over the last few years. Insurance is a key component of getting a bank mortgage, so the spatial plan's push for high-density inner-city living will struggle without reforming the insurance market.
17. Rapidly rising insurance premiums are a cost to property owners, but they also act as a disincentive for families deciding whether to buy higher density homes within the city. Potential owners will be scared off if they have to pay astronomical premiums, or worse, cannot secure insurance without costly capital upgrades that could see their property in negative equity.
18. Insurance companies and their representatives claim the market is adjusting to the 2016 Kaikoura earthquakes, making more granular risk-based assessments of properties based on location, and reverting to international norms when compared to similar jurisdictions in Japan and California. The problem with these arguments is that no matter what mitigation takes place, property insurance premiums still go up.
19. We urge the Council to continue working with the Government on insurance reforms that will maintain the affordability of premiums for residential and commercial property owners. Increases to the EQC caps on the cover would seem a sensible immediate step that could be taken; for example, raising the cap on residential property from \$100,000 to \$400,000.
20. Thank you again for the opportunity to submit.

Yours sincerely,



**John Milford**  
Chief Executive  
Wellington Chamber of Commerce

[Redacted]

---

**From:** kate hayward [Redacted]  
**Sent:** 05 October 2020 16:18  
**To:** BUS: Planning For Growth  
**Subject:** Submission on the Spatial Plan  
**Attachments:** Kate Hayward Submission Spatial Plan final.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Kate Hayward  
[Redacted]  
Mt. Cook, Wellington

[Redacted]

Please find attached. I wish to speak to my submission.

**SPATIAL PLAN SUBMISSION:  
Inner Suburb Villages – Concerns & Corrective Recommendations**

I have grave concerns regarding the WCC Spatial Plan, especially in regards to the inner suburb villages.

Though building upwards can help to reduce sprawl, it needs to be done in such a way that that we don't destroy the aspects that make a city liveable and this includes Wellington's unique character.

I was shocked to see such enormous swathes of land in the inner suburb villages zoned "mandatory at least 6 stories and up to 8" (!!?). Though the intention – to prevent sprawl and create affordable housing is laudable, destroying neighbourhood character and blocking sunlight/views by pepper-potting towers next to residential homes is NOT the solution. This is appalling urban design! Yet, this is exactly what will happen under this Spatial Plan because an excessive amount of land has been designated high-rise.

Intensification requires good design and needs to be done well. Do it poorly and you will drive people away!

The solution is that the spatial plans needs to designate discrete, concentrated areas where a cohesive, almost 'brownfield' approach can be taken. For example, **Cr. Nicola Young** has suggested (at the MCM September 20<sup>th</sup> public meeting) that a new "**Adelaide Village**" could be created by designating an area along the lower end of that road for high rises, thus leaving much of the Mt. Cook "as is" and preserving its character, whilst accommodating the additional people we will need to. *Concentrating* intensification means that an overall plan can be created which incorporates good pedestrian linkage, the pepper-potting of green pocket parks and planned stepping of height so as to maximise sun and protect lines of sight.

The Master Plan under which the **Arlington** social housing is being built **is a good example of intensification** being achieved in such a way that a MORE liveable community is being created. Built under SHA rules which allowed six stories, the Arlington development will house 3.5 times more people than previously. However, through the use of: height stepping, mixed typology, and the creation of new pedestrian links and new 'pocket parks' within the Arlington block of land, *intensification was achieved without the loss of amenity value*—both for its future residents and for those living in the neighbouring turn-of-the-century homes that border on Arlington.

Arlington is an example of what can be achieved with concentrated intensification which utilises **a cohesive, overall design approach** employing the basics of good urban design- e.g.:

- height stepping on a micro and macro level (with mixed typology),
- increased pedestrian linkage,
- additional and well-placed pocket parks.
- adjoining special character protected (including amenities values).

The end result of concentrated, well-planned and designed intensification is a win-win: More people AND more liveable!

This current spatial plan, by crudely painting so much land of the inner suburbs (and roughly HALF of Mt. Cook!) as "six stories and above", will result in **high rises being randomly pepper-potted**. Character/heritage streets lined with human-sized, architecturally detailed heritage homes will be marred by the arbitrary insertion of a 6-8 story tower(s). This is a character loss and visual assault that cannot be un-done. This is the exact opposite of good urban design. This does not create "more liveable" spaces.

The areas for intensification need to be reduced so that it is concentrated. This spatial plan is not nuanced and designates areas for "6 stories and above" that encompasses far too much land.

I queried this at the MCM public meeting (September 20<sup>th</sup>) and learned that the plan *designates 6-7 building lots for high-rise, in the hopes of getting a developer to eventually build on ONE lot!* So, this spatial plan is set-up to accommodate, guarantee and, in fact, encourage tower pepper-potting!! This is WRONG!!

**The Spatial Plan needs to reduce and concentrate the area for high rises**, so that random pepper-potting of towers is avoided.

I have read these critiques of the Spatial Plan and I believe they have merit and should be heeded.

- Growth Figures Exaggerated. The WCC Spatial Plan assumes the *upper level* of the population growth estimate over the next decades, rather than *the more realistic mid-range figure*. (The mid-range figure would halve the areas of character destruction).
- Planning Process Flawed. The WCC needs to take the time to prepare a “Future Development Strategy” to inform the review of the District Plan. This is the planning process prescribed by law. (In essence, this Spatial Plan represents the ‘cart before the horse’!).

In fact, I get a sense that this WCC Spatial Plan is something of a knee-jerk and crude implementation of the central government’s “National Policy Statement on Urban Development” (NPS-UD). I see no provision for new pedestrian linkages and pocket parks – all of which are essential when intensification is pursued.

I would like to close on this thought – consider how many times have we seen cities jump on a “solution” that involved the destruction of neighbourhoods, only for that “solution” to fail the test of time. That belated realisation does not restore the irrevocable destruction of heritage character and liveable communities that was done when city officials “jumped on the bandwagon solution”. Examples that come to mind are free-way construction along the San Francisco water front (replicated in many other cities); the notorious Cabrini Chicago High-rise Towers (which were copied in almost all major US cities after neighbourhood communities were bull-dozed).

Yes, we do need to intensify. Yes, we do need to avoid suburban sprawl. However, we must do it in a way that is measured, well-planned and well-designed. This Spatial Plan exaggerates the amount of land needed to accommodate future growth. By zoning far too much land as 6+ stories in the inner suburbs, we will end up with “pepper-pot tower sprawl”.

To summarise, these are my recommendations:

1. Drastically **reduce the amount of land set-aside for six-plus stories** in the inner suburbs. (This will avoid pepper-potted towers and will preserve more of Wellington’s character).
2. Designate **additional pocket-parks** and create **new pedestrian linkages** in those (concentrated) areas of intensification.
3. **Ensure heights are stepped** so as to preserve views, sunlight and create a visual transitioning.

The first recommendation is key – the intensification needs to be concentrated; not pepper-potted. The last two items will ensure intensification is done in a way that enhances amenity value and ‘liveability’.

Sadly, none of the above three are present in this proposed WCC Spatial Plan. I am afraid the plan needs to be completely re-worked, rather than simply tweaked.

I wish to speak to this submission.

[REDACTED]

Hankey

Mt. Cook, Wellington

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [14121](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Kate Morris

**Suburb:** Te Aro

## 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 character is the people and the businesses there - a 'character' area isn't important to me if the residents are sick from cold moldy houses, and financially struggling because of low demand and high rent prices

**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, Employment opportunities, Social services and community facilities, 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, 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.**

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?**

Parks, forests and green spaces so I could get outside and feel connected to nature without being around other people

Free public transport was a huge help

**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?**

Moving in the right direction for providing more housing, focus on importance of green spaces

**2. What would you change or improve?**

A more public health and wellbeing focused approach - focus on the people, not the 'character' houses

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

Affordable and healthy student housing near to the university

**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.**

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.**

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.**

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.**

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.**

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.**

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**

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?**

**Other:**

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

Students need affordable and healthy housing - we don't care about the 'character' of a house

**Have you provided an attachment?**

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15361](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

---

**Submitter Name:** Maddy McVie

**Suburb:** Ngaio

## 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?**

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?**

Walkability / bikeability / wheelability to the city but not being right in it. Sun, and native green space - including pocket parks / town belt. Mori history manifested. Natural history manifested - streams, scarps etc. I love seeing the birds coming back, and wish there was more of a mix of people around me - ages, life stages, lifestyles, ethnicities, abilities etc. Small / friendly shops / hospo businesses being able to recognise faces and feel connected.

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

Access to public transport, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Social services and community facilities, Access to cycleways/routes, Easy walking distance to the centre

**Other:**

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

Public shared spaces, Shops and businesses, 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.**

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?**

Footpaths and green spaces, particularly high places to get good exercise and to feel on top of something. Less busy roads for safer cycling. Having local small businesses like dairies to avoid huge queues at supermarkets.

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

Safe, family-friendly streets including good footpaths and safe cycling / scooting space. To keep distance a lot of walking on the road was required, but due to quiet roads people were driving without thinking about others.

**Non-Compulsory Questions**

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

Prioritises density, especially in combination with access to public transit.

**2. What would you change or improve?**

Tie in with Let's Get Wellington Moving plans and other areas to ensure it is an actual spatial plan not just a housing plan.

**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.**

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.**

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.**

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.**

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.**

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.**

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?**

Working with Mau Whenua, not PNBST, to ensure that the land is used in the way that most benefits the tangata whenua of that area. Council should build relationships with this group and offer support, but let them lead.

**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?**

Other:

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

Much more collaboration with tangata whenua. In general, dense, accessible, housing with access to high quality infrastructure, particularly three waters, safe active and public transport infrastructure, and community and green spaces. Make all areas of the city accessible to people of all incomes and situations.

**Have you provided an attachment?** No

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15584](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Mark Harrison

**Suburb:** Crofton Downs

## 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?**

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?**

1. Focus build around the centre - The area surrounding the city centre is not aesthetically great. This should be prioritised for redevelopment and high rise. Let's use development to bring up less aesthetic areas rather than destroying good areas (such as the western suburbs). Amenities within multi-mode walking/scooter/cycle distance from city is much better for high density dwellers rather than reliance on one small insufficient train line.



2. Shoebox flats are not the answer - High volumes of shoebox flats throughout the western suburbs are not the answer. They get the numbers quickly, but they're no place for families and children if there's a choice of some private outdoor space. Adults can compromise, but children's development requires private outdoor space for play. The body corporate system is open to abuse (financial and social) with weak rules providing woeful protection for owners and tenants. Family homes should be in the outer suburbs and apartments in the inner suburbs. The plan seems to imply the opposite.

3. Different areas have different needs - we need to build sympathetically to the area and allow different areas to specialise in facilities for people at different stages of life (e.g. family home areas, student areas, retirement etc). Facilities can't be everywhere so mixing everyone up just means people will resort to private transport (because public transport goes to the centre only). Different groups have different needs, different tolerances (noise, drunkenness, children, vulnerability) and different requirements of their area, which is why areas become specialised.

4. Think iteratively, not big bang - The plan needs to be more agile. Great to outline a vision state, but it shouldn't be implemented in one go. Lifting rules that are in force for a reason in a blanket rather than targeted manner leaves many to the mercy of developers and the currently non-existent rules to protect current owners and occupiers. Any changes to the district plan should be phased. It's good practice to be agile and iterative.

5. High rise comes at a disproportionate cost for residents and risks inequity - High rise should be extremely concentrated and consider the area - starting with city centre/heavy urban areas (e.g. Newtown and Johnsonville). This is because high rise has significant adverse effects on any low-rise next door. It's unfair to expect people who now live in the wrong colour box on a plan to have hundreds of thousands of dollars wiped off their home value because a developer decides to build a tower block next door. These are not necessarily rich people - many have bought recently and are heavily mortgaged (over 50% income on mortgage repayments) with young families to support. While appreciating some of the rules are imposed by central government, how Council tackles the unanswered questions around fairness of implementation is crucial to the plan's success and equity. We must remember why height restrictions were there in the first place. Less restraint is needed in the already dense urban centres.

6. Transport is everything - new satellite cities with decent train links would be the ideal solution with less impact. Speeding up the Upper Hutt, Porirua and beyond connections to allow more frequent connections to the city, and better station transport and parking will help satellite towns grow Wellington without destroying its character.

Housing should follow, not precede decent transport links. The Johnsonville line for instance is woefully inadequate for the level of housing proposed and the roads are insufficient.

7. Revisit all assumptions made prior to covid - Assumptions made by the public a year ago have changed. Covid has happened. City centre access is now less pressing with many city workers looking to work days from home. Is the 80,000 homes needed figure still applicable? Outdoor space is essential and high rise shoebox apartments are not good in lockdown or for mental health. The world population is predicted to start falling in the next few decades. Let's not destroy make compromises that future generations don't need us to make.

**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?**

Not sure

**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?**

Keeping well preserved architecture is important, but not at all costs. Ideally these areas should be intact and the views of residents themselves are most important. What someone who lives there thinks, is more important than someone who rarely visits.

Residents disproportionately and adversely affected by this plan should have their losses refunded by the developers, Council and/or government.

**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), Medical facilities/centres

**Other:** Car parking spaces in the centre so people outside walking distance can make use of the transport hub (park and ride), or frequent the businesses.

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

Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Child care, Medical facilities/centres, 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 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?**

Greenery and views around the suburb - simply to walk around the streets and admire what makes the area special. There is a general community consensus on the importance of the non-urban nature of the area, and it's priceless now, and for future generations.

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

Could do with another medical practice/dentist

## Non-Compulsory Questions

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

The plans for the city centre itself and city centre fringe are good.

2.

3. Agree with intensification of urban areas.

### 4. What would you change or improve?

Strongly disagree with intensification of suburban areas.

5.

6. Removing the inappropriate designation of the Johnsonville line as a mass rapid transit line would negate much of the issues with these plans.

7.

8. In addition:

9.

10. 1. The height restriction limits in the outer suburbs are particularly concerning. Appreciate Central Government has fettered the Council's ability to make decisions on this, but seeking residents' views on them is still important. The government released the policy statement during the pandemic. Residents were not made aware of the consultation on it which is strange given the severe impact it will have in its current form.

11.

12. 2. Imposing such massive change to areas that aren't appropriate for it leaves everyone wide open to risk. Height restrictions are in force for a reason. Let's not forget why they were put there. We need a gradual approach that involves and values the community in planning.

13.

14. By leaving it up to the developers where to develop over a massive area, the risk is that developments will be piecemeal and maximise disruption and loss of amenity for many communities without seeing the benefits of increased housing numbers.

15.

16. Town planning needs to plan and control this one tightly, not loosen all the controls immediately across the board, handicap people from rightfully objecting, and allow haphazard development that will destroy the character of the city and suburbs people have said they want to preserve. Careful planning in close collaboration with neighbourhoods is needed, with those disproportionately affected receiving support - just like those who lost their jobs during covid.

17.

18. If neighbourhoods are given the task to work out where houses go and input what designs work it will make for a much more inclusive process with better outcomes. People get the need for more houses, just don't want to lose tens or hundreds of thousands of dollars and live next to a monstrosity. If planned correctly this needn't be the case.

19.

20. 3. To successfully increase height limits the following needs to occur:

21. a. High rise buildings should only be developed next to each other rather than scattergun over an area. Low rise dwellers should not be surrounded by high rise developments through no fault of their own.

22. b. The height limits are only increased if sufficient transport links are available and it doesn't compromise the area.

23. c. Buildings are sympathetic to the surrounding and use the contours and greenery to minimise encroachment into the light envelope and privacy of neighbouring properties.

24. d. Where this is not possible and neighbours are disproportionately affected for a developer's benefit, the loss of value should be provided to the neighbours as compensation (same as for any public infrastructure works) otherwise it's theft of amenity: light, privacy, parking congestion and views.
- 25.
26. 4. Not everyone wants to live in an urban area. Don't simply say all areas with decent transport links need to be urbanised else this takes away people's choice.
- 27.
28. Conclusion: In their current form, these plans are extremely worrying, with no safeguards visible which will lead to a wild-west situation with developers able to impact neighbours to the tune of hundreds of thousands of value of amenity without any regards. There is no accountability (local or national government) for this.
- 29.
30. These plans need to be paused until appropriate safeguards are in place.

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

See answers above.

- 32.
33. Firstly the district plan should be evolved iteratively, starting with the centre and inner city. Assumptions around demand need revisiting post covid. Could some offices be rezoned as residential as the demand for office space collapses with people working from home?
- 34.
35. Implementation rules are key:
36. 1. Keep development consents localised and gradually raise the heights in appropriate urban areas (not suburban)
37. 2. Put in place mechanisms to make sure developments are sympathetic and appropriate to the areas (e.g light planes should not be crossed)
38. 3. Make sure neighbours are not disproportionately affected and shouldering all the burden of fitting in more houses. The developers need to share their rewards and not steal amenity from neighbours to benefit the profit on their developments.
- 39.
40. Some creative thinking is required. Allowing developers to build monolithic freestanding blocks in outer suburbs (6+storeys is huge) is not the answer. Can we achieve this more sympathetically and with dialogue and proper controls?
- 41.
42. Let's intensify urban areas and keep suburban areas special for those who have actively chosen a non-urban place to live and raise their family.
43. **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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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).**

Not sure

**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?**

Let the locals decide. Mail them all an in-depth consultation and hold some public meetings to determine scope.

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

Let the locals decide. Mail them all an in-depth consultation and hold some public meetings to determine scope.

**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.**

Seriously need to pause and re-think on this one. The plans are unworkable as they stand.

Remove the designation of mass-rapid transit line from Johnsonville line - this removes the constraints imposed by ill-considered government legislation and will allow the destructive 6+storey rule to be replaced with something better.

At minimum, the proposed 6+ storey development area in Crofton Downs exceeds the boundary of the station 5 minute radius. Please restrict any height increases back to the 5 minute ring (400m).

If 6+ story buildings are developed along Silverstream road it will destroy the amazing views that all walkers, cyclists, traffic on the road and wildlife gets of the valley. It's a real public amenity.

This is a critical issue for us, and we have lost sleep over these plans, and their lack of safeguards. This plus the poor consultation process on the NPS on Housing & Urban Development which has made the spatial plan effectively a done deal, are incredibly concerning.

We urge the Council to remove the rapid transit designation from the Johnsonville line to allow these plans to be re-thought to be more appropriate for the area, and to lobby national government to make sure appropriate safeguards are in place so homeowners in the wrong coloured box on the plan don't bear the brunt of this policy.

**Have you provided an attachment?** No

**From:** Mark Harrison [REDACTED]  
**Sent:** 12 October 2020 10:13  
**To:** BUS: Planning For Growth  
**Cc:** Esther Harrison  
**Subject:** Fwd: FW: NCDRA Submission on Draft Spatial Plan. Members comments sought  
**Attachments:** NCDRA\_Draft Spacial Plan Comments\_MH Amendments.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Hi team,

Our comments were unfortunately not included in the Resident's Association submission (due to a mailing list mixup and I only had 24 hours to get them in). The Chair recommended I submit them directly to you and request the opportunity to make an oral submission.

I have already made a written submission personally, (you're welcome to attach these to them. The points in this doc are from both Esther and I and are perhaps a bit more succinct). I would very much like to request the opportunity to make an oral submission in any case.

Many thanks,  
Mark

On Mon, 12 Oct 2020 at 08:53, [REDACTED] wrote:

Hi Mark thanks for your comments.

I suggest that you email your amendments to WCC as a separate late submission. If accepted you will have the right for a separate verbal submission in your own right. Thanks for your offer of support – submissions will be limited to 5 minutes (maybe 10), so we will need to concentrate on the main points and getting them across succinctly.

Kind regards

Ian

---

**From:** Mark Harrison [REDACTED]  
**Sent:** Saturday, 10 October 2020 11:02 pm  
**To:** [REDACTED]  
**Subject:** Re: FW: NCDRA Submission on Draft Spatial Plan. Members comments sought

Thanks Ian,



We've had a look through and made some comments and tracked changes. You raise a number of good points, I have elaborated mostly to call out the material risks that residents are facing from this and seek some assurances around safeguards.

Hope these make sense. Ultimately there has been little time spent on discussion about some of the most radical housing plans in the last 50 years, during a pandemic, election and referendum cycle.

Have tried to turn these comments around quickly for you given the submission deadline.

Given the significance of the comments, and the risks to residents, it is clear that the only logical course of action is for the RA to oppose the spatial plan in its current form, and seek amendments to address the RA's concerns before any decision to support the plan is considered.

I would be happy to support the oral submission.

Thanks,

Mark and Esther

On Sat, 10 Oct 2020 at 11:13, [REDACTED] wrote:

---

Hello Mark – I sent this email out at the start of the week – but the list I used appears to have not yet had your name on as a member. Sending now as you had earlier asked our next steps – apologies for the lateness.

I will be making our submission on Monday afternoon – we have been granted an extension.

Kind regards

Ian

This email is being sent to members of our association and has attached to it, a draft submission that Ngaio Crofton Downs Residents Association (NCDRA) intends to send to Council, regarding the Draft Spatial Plan. We are seeking members' feedback, so that we know we are fairly representing the views of our residents

Wellington City Council is currently consulting with its residents on this important document that will guide Wellington's growth over the next few decades.

The Council's website says "The [Spatial Plan](#) will set out our 'blueprint' for where and how we want to direct growth across the city. Whereas the [District Plan](#) is the 'rule book' that sets the rules for building heights and what types of housing and activities are permitted and where.

We know that without serious changes to current District Plan building rules, Wellington will be short between 4,600 and 12,000 dwellings by 2047, which means doing nothing is not an option".

If you wish to comment on the submission please do so – by return email or feel free to call me on my phone number below. **We ask for replies by Friday 9 October.** Some may realise that this is after the published deadline, but NCDRA has had an extension granted so that we are able to make our submission up to Monday 12 October.

Kind regards

Ian Turk



Chairperson

Ngaio Crofton Downs Residents Association Inc

[info@ngaio.org.nz](mailto:info@ngaio.org.nz)



If you no longer wish to receive emails like this from NCDRA, please reply with Unsubscribe in the subject of your reply email.



Virus-free. [www.avast.com](http://www.avast.com)



Ngaio Crofton Downs Residents Association  
36 Chelmsford St  
Ngaio, Wellington  
info@ngaio.org.nz

5 October 2020

To: Wellington City Council

#### Submission on the draft Spatial Plan

On behalf of: Ngaio Crofton Downs Residents Association

By: Ian Turk, Chairperson

Contact Details: Ph: [REDACTED]  
Email: [chair@ngaio.org.nz](mailto:chair@ngaio.org.nz)

#### INTRODUCTION

Ngaio Crofton Downs Residents Association represents the interests of, and advocates for, residents in the suburbs of Ngaio and Crofton Downs. From the 2018 census, the total number of residents in these suburbs is 7,275.

#### THE DRAFT SPATIAL PLAN

To present a considered view on the draft spatial plan, we believe it is necessary to put it into a context. This first part of our submission describes our understanding of the boundaries that scope the plan, and the mandatory components.

- 1. Population estimates** – NCDRA is concerned that the population estimates used in the plan cover a wide range and the implications for infrastructure (water, power, sewerage, transport, schooling) vary markedly across that range. We believe a clearer message on how the target populations are determined could help residents understand the basis for the plan.

We understand that the figures are derived from a 'mid-range' estimate that Wellington's population will grow by 50,000 people through to 2043. Margins are added to this to provide more housing than needed, to allow for unoccupied dwellings, variety and choice. On top of this, not all of the capacity that is provided for will in fact be built. These factors add over 20% to the actual requirement, and WCC is mindful that a high rate of growth could result in 80,000 residents by 2043.

We note, however that the global environment has changed: with borders closed, a changed global economy, increases in remote work and predicted population declines in

**Commented [EH1]:** Is/was a resident's meeting planned to discuss the plans and their implications? Given the massive potential impact on individuals NCDRA has a key role to raise awareness through a series of public meetings and leafleting. Residents are simply not aware of the plans let alone their impact (based on what appears to be rushed, poorly written legislation) will have on them. Residents need space to reflect on these plans which has been impossible with covid, elections and referenda.

**Commented [EH2]:** Less important point:

The basis for this range also needs to be stated. The world has changes and assumptions may no longer be valid. For instance, with more remote working and part-time commuting, it may be appropriate to rebalance some growth into satellite cities with improved transport links – NZ has lots of land outside of Wellington. Some of this will be outside the Council's control, but still worth them revisiting this as they may be able to reduce the forecast and therefore the impact.

See:  
<https://www.forbes.com/sites/trevornace/2020/07/17/world-population-expected-to-peak-in-just-44-years-as-fertility-rates-sink/>

the latter half of this century<sup>1</sup>: are the estimates around where, when and how much growth still valid? We would recommend revisiting these assumptions as part of due diligence. For instance, satellite urban areas may now be more appropriate to spread the growth to with rising numbers of people remote working. There is much space outside the city limits and this could ease the burden of the plans on suburban areas that people have chosen for their character and family-friendly environment.

2. **National Policy Statement – Urban Development 2020 (NPS-UD)** – We understand that the NPS-UD contains mandatory planning provisions that must be applied across New Zealand. The most prescriptive measures are:

- a) District Plans for tier 1 areas (such as Wellington) must enable buildings of at least 6 storeys in certain areas, and
- b) District Plans must not include any requirements for parking, other than related to access ability.

We have significant concerns about the development of “one size fits all” prescriptive measures and our residents have felt there has been a the apparent lack of consultation in developing them. In particular we highlight concerns that the regulation fetters the ability of Council to implement rules around consent that would mitigate some of the harsher implications on our residents, as well as the rights of residents to object to inappropriate developments that could cause them hardship. These risks are material and we urge Council to work with us to identify and mitigate them over the coming years.

However we realise they are now a national issue and the Council is bound by them unlikely to be changed. Yet, we would ask the Council to note our objection and concerns around the NPS in its current form. In our submission, our comments accordingly, accordingly seek to achieve the best quality outcomes in the spatial plan which is consistent with the NPS-UD.

The spatial plan is a very high level document. Our view is that it presents an acceptable vision for Wollington growth which is in line with earlier feedback from consultation on possible growth scenarios.

We note that the Boffa Miskell report on Spatial Planning of 6 May 2016 has a definition which says a spatial plan is a means of “ providing a visual illustration of the intended future location, form and mix of residential, rural and business areas, along with the critical transport and infrastructure required to service those areas.”

We believe the WCC draft spatial plan is weak in describing the “critical transport and infrastructure required.” WCC will need to invest heavily in infrastructure maintenance as shown by Wellington’s recent water and sewerage issues, as well as in significant works to cope with the forecast population change.

We appreciate the spirit and work that has gone into the spatial plan and broadly support it’s objectives, however we must strongly oppose it in its current form due to:

1. Our residents (and elected representatives) telling us that consultation during covid, elections and referenda has left them with insufficient awareness and time to digest and discuss the implications of the NPS and these plans
2. Seeking assurance and an indication that safeguards will be considered to prevent residents bearing significant cost and impact from the plans
3. Desiring to see the transport and infrastructure component that is a foundational dependency for housing growth.

**Commented [EH3]:** [Aside: This will have implications for residents wishing to have electric vehicles (as these require permanent parking spaces with charging points)]

**Commented [EH4]:** There was a lack of consultation. It was during Covid and an election cycle. We only happened to stumble across it. This is simply not good enough and we encourage Council to pass on this feedback. We also need Council to be aware of the implications NPS has on the ability for Council to control and locals to object to inappropriate development.

**Commented [EH5]:** We strongly object to the plan which has to be viewed in light of the NPS. It is unacceptable and Council’s ability to control the implementation is so fettered by the NPS that it has the potential to allow inappropriate development which causes hardship for residents. We have seen no safeguards so far that would allow us to rule out this scenario.

**Commented [EH6]:** If the plan is not complete it raises material risk to our residents and has had insufficient consultation then it must be opposed in its current form. We can support the broad objectives.

**Formatted:** Font: Bold, Underline

**Formatted:** List Paragraph, Numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.63 cm + Indent at: 1.27 cm

**Formatted:** Font: (Default) Arial

<sup>1</sup> <https://www.forbes.com/sites/trevornace/2020/07/17/world-population-expected-to-peak-in-just-44-years-as-fertility-rates-sink/>

We would like to work with the Council and residents to refine the spatial plan and put in place the safeguards needed by our communities.

## THE DISTRICT PLAN

The draft spatial plan relies heavily on the District Plan to translate the vision into reality. The District Plan must be drafted clearly and concisely with no ambiguity to achieve the following objectives:

1. **Quality Outcomes** – we need a guiding vision and firm rules to control the intensification in terms of aesthetics, function, safety and juxtaposition with surrounding dwellings and amenities. The District plan must both enable and enforce developments that Wellington residents accept as high quality; that contribute to the city's aspirations of being compact, resilient, vibrant, prosperous, inclusive and connected; and that keep the city green and pleasant as a place to live. Lifting the height restrictions across the city in a 'big bang' approach without safeguards and careful control risks a 'wild-west' scenario where neighbours could suffer serious impact to benefit developers who steal their light, views, amenity and family privacy. We are looking for a commitment to our residents that those in the 'wrong coloured box on the plan' will not be disproportionately affected and the Council will work with us to ensure there are appropriate consultation, grounds for objection, and mechanisms for redress such that the change is implemented equitably for all residents.
2. **Infrastructure** – residents throughout Wellington are concerned about the state of our infrastructure. It is essential that existing infrastructure is adequately maintained and suitably adapted to climate change; and that new capacity is provided in time for planned growth. We would like some indication of how this will be funded, and how this will be made fair and equitable for residents, existing and new. We are looking for these questions to be addressed in a revised version of the spatial plan.
3. **Housing to suit all budgets** – the spatial plan does not address provision of housing that is affordable to all sectors of our community. Indeed, without radical design initiatives it is hard to see how apartments in new, multi-rise buildings that are weather-tight, attractive and adequately protected from earthquake damage can be built and sold for less than \$10,000 per square metre. Developers have shown no willingness to solve this problem and finding a solution should be amongst the Council's first priorities in the District Plan. This may mean, in some cases, that cheaper, low-rise buildings may be more appropriate (as well as avoiding impacting the character of the area).
4. **Green or open spaces** – the District Plan must include rules to provide residents with views of and access to green or open spaces (a core aspiration of Wellington residents). It is unlikely that purely commercial decisions will offer quality outcomes. We would like to see a phased implementation plan that sits alongside the District plan, that provides for a gradual rollout and focusses development attention on urban areas first, which:
  - a. Are ready for, and need the increased occupancy to regenerate (e.g. Johnsonville centre, as opposed to suburban areas, e.g. Ngaio/Crofton/Khandallah, which serve a different purpose and hold a completely different character)
  - b. Allows Council to complete necessary infrastructure upgrades for a specific area rather than being spread too thin
  - c. Provides critical mass for necessary private services to be established and uplifted
  - 4-d. Prevents a "wild-west" situation where development is piecemeal, incoherent and causes hardship to residents

**Commented [EH7]:** We should be pushing for some broad commitments to fairness and equity at this point.

The open questions are for instance: what safeguards will be in place to ensure residents are not disadvantaged by development to the tune of hundreds of thousands in loss of amenity: light views privacy for children by inappropriate development? Especially given the NPS removes or significantly restricts many normal grounds of objection.

**Formatted:** Font: (Default) Arial

**Commented [EH8]:** It's again critical that existing residents don't bear the brunt for this.

**Commented [EH9]:** Without safeguards removing height restrictions and the ability for effectively any objection to development we risk a wild-west scenario. The developers need to be focussed by Council to develop in a coherent and planned way.

We don't need all the capacity at once. Focussing on urban areas first has many advantages. We don't want to turn all suburban areas into urban ones this defeats the point of having housing choices and needs.

**Formatted:** Font: Not Bold

**Formatted:** Font: Not Bold

**Formatted:** Font: Not Bold

**Formatted:** Font: Not Bold

**Formatted:**



5. **Transport** – mindful of the complete failure of the last upgrade of the transport system, it is NCDRA's view that substantial investment will be needed to maintain effective connectivity with an increased population, especially on the routes into and out of Ngaio and Crofton Downs. The roads and transport in and out of the Crofton and Ngaio area are geographically restricted by the topology of the land. We must not exceed their - Particular limits. Particular attention needs to be paid to known existing bottlenecks to increased capacity such as the Karori and Mt Victoria tunnels, and ~~potentially~~ the Johnsonville railway line.
6. **District Plan Compliance** - It is one thing to plan but WCC has shown a high level of willingness to permit individual officers to approve variations to the conditions of resource consents even after these conditions have been agreed with residents and confirmed by the Environment Court. When there are widespread non-transparent and undemocratic decisions being made by Council Officers under the guise of compliance discretion, there is no assurance that the District Plan will actually control what we end up with. This is another urgent matter to address and we would appreciate some assurance on the direction Council is planning to take.-

**Commented [EH10]:** I would remove 'potentially'. The roads in and out of Ngaio are inadequate for the proposed development.

**Formatted:** Font: (Default) Arial

I wish to make an oral presentation to support our submission.

Ian Turk

Chair

Ngaio Crofton Downs Residents Association.

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15544](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Martin Jenkins

**Suburb:** Khandallah

## 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?**

Greenfields sites on the city fringe, as every other city does.

**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?**

Amenity values - Heritage & Cultural Values, Vegetation, Trees, Gardens, Recreational space, Noise levels, Physical safety, Vista & Views, Character of the neighbourhood, Privacy, Landscape, Open Space (public and private)

**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), Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Medical facilities/centres

**Other:**

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

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, Cafes and restaurants, 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 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?**

Supermarkets, Community Centres, Pharmacies, Medical Centres

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

Hospital

**Non-Compulsory Questions**

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

I do not like the Draft Spatial Plan for Wellington City.

- 2.
3. However, I do like the object of creating more 'affordable' and for that matter 'social' housing.
- 4.

**5. What would you change or improve?**

Delete 6 storey buildings planned for the suburban centre of Khandallah

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

Absence of details on addressing all of the 'Amenity Values' listed in the attached document.

7. Absence of Infrastructure planning
8. Absence of carparking, transport planning
- 9.
10. I can't support any 6 storey residential apartments for the Khandallah Suburban, for the reasons outlined in detail, in the attached document.

**11. 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.**

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.**

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).**

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?**

#### **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?**

Financial assistance

**Other:**

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

Detailed in the attached 10 page document.

**Have you provided an attachment? Yes**

## **Comments on the Spatial Plan –**

Specifically the Khandallah Suburban Centre planned 6 storey residential apartments

Whoever suggested that the 6 story height would release residential developments that generate acceptable development margins, needs to revisit the Property Development Financial Model. I.e;

### **PROPERTY DEVELOPMENT FINANCIAL MODEL**

Property development financial models are made up of

1. The Development Costs
2. The Projected Development Revenue

Developers seek a Development Margin (DM) which is calculated by

$(\text{Capitalised Value} - \text{Total Development Cost}) / \text{Total Development Cost}$

The DM is typically expected to exceed 25% , however higher DM' have been obtained in several central city apartment developments.

The Development Costs are made up of the following;

Land, Construction, Consultants, Finance, Associated Development Costs (Council fees, development contribution etc)

The Projected Development Revenue is made up of the following;

Sale price of units x no. of units + Carparking (less legal and agent fees)

Vacant land alone (when available) in Khandallah currently sells for \$1000/m<sup>2</sup> and construction rate of say \$3,500/m<sup>2</sup> (plus to allow for multi-level), to achieve a 'affordable housing' \$750 K (assumed to be 75% of the median Khandallah house price of \$1M) it would be marginal to make this profitable with 6 levels of apartments, unless a very large development, taller building, lower land cost, or the apartment end value was higher. The more story's the more expensive construction becomes. Acquiring large sites is very difficult indeed in an established area. As any supermarket developer will tell you !

By giving the landowners the ability to place say 12 units on their property rather than 2 residential apartments, will potentially dramatically increase the value of any land, which is likely to make affordability worse over time. Valuers work to highest and best use (with as many apartments as they can accommodate), to determine a residual land value.

## **MOTIVATION FOR THE SPATIAL PLAN**

It has always been my understanding that the motivation is to create more ‘social’ and ‘affordable’ housing throughout the country, for both current and future people who require homes. I agree with this objective.

However, I was at a public meeting recently where Greg O’Conner MP, said that the motivation was to enable those living in large homes in Khandallah to downsize to a smaller home in Khandallah. This appears contradictory, because anyone who lived in a premium Khandallah home would expect to downsize to a ‘premium’ apartment (level at what they are used to), rather than an ‘affordable’ apartment.

## **PROJECTED POPULATION GROWTH**

1. I question the anticipated growth of up to 80,000 people in Wellington over the next 30 years. With the movement of Government administration out of Wellington to other centres, Corporate Headquarters to Auckland and the drift of workers to the brighter job opportunities north, Post-Covid changes in immigration, and population moving up the coast when Transmission Gully opens etc.
2. The population growth rate over years in Khandallah has only been 1-2% 1.4% (Statistics 2018) in the past.

So, the distribution of the 80,000 would need to be taken into account. This would mean only a very small amount of additional accommodation would be needed but could potentially be provided by other means.

## **POPULATION FOR KHANDALLAH PROJECTED TO DROP TO -0.23 % BY 2043 ! (This link includes the Council logo)**

See the link below;

<https://forecast.idnz.co.nz/wellington/about-forecast-areas?WebID=180>

I feel that it is misleading to try and extrapolate population growth out to the suburb of Khandallah from the central areas.

## **EXPANSION OF SUBURBAN CENTRE IS REQUIRED**

If many more people decided to live in Khandallah in the next 30 years (and none of us really know), combined with the increased rate of aging population in the next 30 years (27% of people will be aged over 65 years in the next 30 years), then the Khandallah Suburban Centre will need to be expanded significantly to keep up with this growth.

The Community should work together with planners, property owners and other stakeholders, to determine how they would like their Suburban Centre to appear over the next 30 years. Perhaps a town centre (with less cars on Ganges Road), and an extension of the existing Commercial and Community facilities along Ganges Road and Dekka Streets, to accommodate the increasing needs of the Khandallah community and aging population.

As Khandallah residents age, they will become more reliant on local Commercial businesses and Community Facilities. This will become even more important as;

- The cost of parking in the city increases, becoming unaffordable
- The cost of public transport to the city becomes unaffordable
- Car parks are taken away from the Central area, so elderly shoppers are unable to park outside shops that they wish to visit.

Note: elderly people can't do their food shopping using a bicycle.

## **RENAISSANCE & GROWTH**

Having lived in the Khandallah area for 60 years I have observed that the Khandallah Suburban Centre is going through a renaissance and continues to grow.

The Khandallah Community needs to get together to see how they would like their Suburban Centre to grow over the next 30 years. Work out a plan and make suggestions to Council staff over usages, future zoning and public spaces.

### **VIBRANT MIX OF BUSINESSES AND COMMUNITY**

The Khandallah Suburban Centre already has a vibrant mix of Commercial businesses and Community facilities that continue to grow, including a Medical Centre, Veterinary Practice, Supermarket, Medical Practice, Pharmacy, Post Office, Bank, Town Hall, Community Centre, Library, Pub, Cafes, Restaurants, Art Gallery, Church and various retail outlets.

### **NO NEW RESIDENTIAL DWELLINGS SHOULD BE BUILT WITHIN THE SUBURBAN CENTRE**

I am strongly opposed to any more residential dwellings being built within the Khandallah Suburban Centre, as part of the 'multi-use' zoning. If this is allowed to take place residential apartments will over time 'erode' the Suburban Centre. Once there is no longer a 'critical mass' of Commercial and Community facilities, the Suburban Centre will disappear and there will be nothing for the growing and aging population.

There are already 723 residential dwellings (Statistics 2018) within walking distance of the Suburban Centre, so more residential dwellings are not needed within the Suburban Centre to support it. The space needs to be reserved for Commercial businesses and Community Facilities that serve everyone in the Khandallah area. For Suburban Centres to do well, they need a major anchor (ideally a well known department store, but failing that a supermarket – to draw people into the Suburban Centre.) Khandallah has such a supermarket. Porirua is a good example with their supermarket, speciality shops and carparking. To the contrary, a well known failure (largely as a result of no anchor tenant) was the Queen's Wharf Offices in the Wellington C.B.D.

Mixed- use with a residential component can presents other difficulties. Most developers do either residential or commercial development, but not both. They have different markets, returns etc. Developments are more complex and they present challenges in their different property management requirements. To work, the upper levels needs to integrate with the ground level retail. Having an 'affordable' grade occupant upstairs is not going to match well with 'premium' grade retail downstairs etc. Retail shops require specific configuration to their use, so once the residential apartments have been built there is limited opportunity to change the retail shop now or in the future. The risk of vacancy over time is therefore high. The other issue is that retail dates relatively quickly and has



to be updated regularly. This can impact on the investment value of the entire development.

Of course, mixed use can work when done well on a large scale (which the Khandallah Suburban Centre is not). The Khandallah Suburban Centre is currently focused on just a couple of short streets.

**With the Spatial Plan ‘one size does not fit all’.**

## **COMMERCIAL & COMMUNITY USAGES ARE IN DIRECT CONFLICT WITH RESIDENTIAL USAGES**

Commercial and Community occupiers want to *attract people* to their businesses and facilities whereas residential occupiers want *peace and quite*. Remember music man Kenny in Courtenay Place who after many years was eventually pushed out by people who had purchased residential apartments in the area.

Noise is a big issue as commercial and community occupiers often work outside normal working hours (eg; bakeries, dance classes, cafeterias, restaurants, pubs....etc)

6 story residential buildings will dominate a handful of commercial businesses and community facilities.

Security is also an issue. There is typically easy access along joint commercial /community premises corridors.

## **PARKING**

The carparking outside the Commercial and Community facilities is limited, as Ganges Road is only a short road.

Due to the renaissance and growth of the suburban centre, many times of the day the carparking is at capacity.

There would be no capacity to incorporate cars from the proposed 6 level residential apartments.

Furthermore, at the times outside normal business hours the carparks are full – catering for the many food outlets and the local pub and restaurant. This would be the same time that the residents in the proposed residential buildings would want to park.

## POPULATION AND DEVELOPMENT

I believe that you need to go back a step, to save time and money. You need to take a look at how populations grow in other cities (ie; diagrams of ‘flowering’ out along transport routes) and get advice specifically in this area. Attempting to build ‘affordable’ housing in an established area, is unlikely to enable a property developer to achieve an acceptable development margin, given the risk.

First *home buyers* and *newly weds* head to the city fringe. That is where the land is cheapest. Once the population grows in and around the fringe, ‘big box’ retailers follow to support their customer and so on. Manakau City in Auckland and Paramatta City in Sydney are fine examples of satellite cities that have grown in this way.

## INFRASTRUCTURE

Based upon feedback and reports, it would appear that drinking water, wastewater and stormwater systems are strained in Wellington, and require significant investment to be repaired and reliable. There has been many years of neglect as has been proved in Central areas. The proposed 3 Waters project does not appear to cover what would be required under the Spatial Plan. The Spatial Plan lacks any detail on how infrastructure would be provided for and how such expense would be covered. Similarly, for the *provision of electricity* (substations) and both the *private and public transport network*. The bus network is already at capacity in Khandallah, with many buses blocking Dekka Street during busy times.

## SIGNIFICANT EFFECTS ON SUBURBAN AMENITY VALUES FROM INTENSIFICATION

I am particularly concerned about the potential loss of ‘**Amenity Values**’ in the Suburban Centre with **6 story residential developments** to be built along Ganges Road.

- **Changes to the streetscape** and the combination of the natural and built environment
- Increased dominance of the built environment due to 6 story residential apartments with the **loss of views** – See the photograph of the ‘view shaft’ along Ganges Road

to Mt Kau Kau. This could well be lost, due to the proposed 6 story apartments on both sides of Ganges Road. This could be considered a ‘heritage’ view shaft.



- Increased dominance of the built environment due to 6 story residential apartments with **loss of sunlight**. Ganges Road could become a sunless, cold, damp, dark and shaded area due to 6 story residential buildings built on both sides of the street. The potential to become a ‘wind corridor’ is very real. In the same way as the Quay outside the Post Office Building in the C.B.D., once the PWC building had been constructed.
- Increased dominance of the built environment due to 6 story residential apartments with **increased shading**

- Unsympathetic **architectural styles** – See the new development at No. 15 Ganges Road. I.e; box like, no exterior design features, material corrugated tin, and the black colour do not fit alongside the Category 1 Heritage listed town hall. The excessive bulk of No. 15 Ganges Road is unsympathetic to the location.



- Loss of **public open space** – The addition of residential apartments in mass will effectively privatise areas that would normally be available to the Khandallah residents visiting the Suburban Centre.
- Loss of **private open space**
- Loss of **privacy**
- **Increased noise levels**  
Noises from the existing businesses and community facility operation will not be any good for the residential occupiers of the proposed 6 story buildings, and vice versa.
- Loss of **heritage and special character areas**  
Khandallah has a number of heritage buildings. I.e; Town Hall, 4 Ganges Road (Veterinary Clinic), Library, 10 Ganges Road, Cornerstone Trust building.



- Loss of **areas of bush, trees and gardens**
- Loss of **wildlife corridors and habitat**

Khandallah has a wildlife corridor in close proximity to the Suburban Centre

- Increased **traffic generation**

Khandallah has already reached it's capacity with traffic along Ganges Road. Crashes in this area are a regular event. Every day someone drives down the street the wrong way due to poor signage. Khandallah has a very bad carpark layout that needs significant work taking into account the age of many of the residents. Bollards have been erected but other issues need to be addressed.

- Increased **on-street car parking**. See the current carparking – at capacity outside normal business hours. There would be no capacity to add in carparking for the proposed 6 level residential apartments. For the grade of the apartments, the occupants are most likely to have at least one car each, however developers will not be required to provide onsite carparks. Afterhours would be a significant problem for parking as the carparks on Ganges road are completely full on most nights of the week leaving no space for the additional cars from proposed 6 level apartment developments.



- Effect of **increased traffic on safety**

Safety is already a significant issue on Ganges Road. I have observed a number of crashes. It has been nicknamed ‘crash alley’ by some locals. Just drive down there during a busy period and you will see why!

- Exacerbated **stormwater flows** will result from increased residential dwellings

## **ORAL SUBMISSION**

I would like the opportunity to make an oral submission, if available.

Martin S. Jenkins B.E.(Civil), Dip.Bus.Studies (Finance)

In 1995, I was appointed as a Development Consultant for the World Square Project, George Street, Sydney. A Commercial, Retail, Hotel, Apartment, Carpark development project  
Total 265,000 m2 (Gross Building Area)

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15119](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Michael Donn

**Suburb:** Khandallah

## 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?**

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 Disagree

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

I am unconvinced of the modelling basis for the 80k people.

However, if I look at the plan, and accept the need for 80k people, then I have no way of connecting this need to the crude planning diagrams provided. These seem to have been predicated on some desire to make

it easy for investors to make decisions about how much an area of land might be worth taking no cognisance of the impact on the wind, sun, and livability of the streets, no recognition of the need for more green space between the buildings if there are more people on the same area of land, no statement about the need for more investment by the people constructing the buildings on providing the infrastructure needed to support a community: from water and data to sewage disposal and storm water management; from space between buildings for light and air to each dwelling to cafes and shops to support walkability; from cycle lanes and transport capabilities to schools and dentists and doctors. This crude diagram could be easily exploited by lowest common denominator investors to deliver instant slums, not an improvement in any neighbourhood. This is no more obvious than on the Johnsonville line where the communities of Ngaio and Khandallah could do with significant sympathetic development, but not the crazy patchwork diagram currently proposed on a rail corridor that is at capacity.

**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?**

In the rush for development, we are allowing apartments that will overheat because they are not designed well for ventilation. We are also allowing housing intensification that shades others property; that sits so close to the neighbour that people will be able to pass coffees from one balcony to the neighbour in the next building, guaranteeing loss of security and privacy; we are permitting the design and construction of apartments that are so dark they will need the lights on all the time. We seem to be wanting to ape the centres of cities in Europe with 6-8 storey street walls, not recognising that the centre of each city block of that type has a large court bringing light and air into the heart of the apartments and guaranteeing they can be well-ventilated.

The character of our local inner neighbourhoods is not being recognised: there are many parts of Te Aro that to me are as interesting and more lively than the precious inhabitants of historic precincts are arguing: with careful local planning the older less functional parts of Thorndon could be upgraded from say Bowen Street to well beyond the entrance to the Botanic gardens; careful planning would look at prioritising pedestrian and cycle movement in a safe, sunny, sheltered environment; the inner city needs to return to urban quality planning, working through the development of the government precinct as a people friendly place, not a selection of wind catchers; the waterfront from the stadium to Kilbirnie park (around Oriental Bay) needs to be developed as a cycle and pedestrian welcoming precinct with much building development that is coordinated to create sheltered sunny spots to gather and at least one more outdoor space to complement Frank Kitts and Waitangi parks; the 'golden mile needs careful nurturing with accessible transport from the suburbs to create the 'shopping centre for Wellington; the Willis/Victoria corridor has a particular character that needs nurturing and growth that recognises the value of further development of through block walkways such as has become possible recently between Dixon Street and Feltex Lane; the Cuba/Marion/Manners area needs development goals that are more than a generous height limit; reward the provision of amenity, not the nebulous goal of 'architectural quality'; enhance and develop the massing rules so the goals of massing are explicit and need to be proved by the proposers of new buildings. The lower slopes of Mount Victoria as the sunset suburb, are our residential jewel; the development here needs to recognise the 4-6 storey height of many existing buildings and to allow development that is respectful of the neighbours - again, I think the character is about walkability, access to the CBD and massing rules that encourage neighbours to respect other neighbours in terms of access to light and air.

Overall, I am concerned that our building rules at present allow office buildings to be developed that are so deep many people have no access to windows; these cannot be converted readily into apartments in the future, as windowless apartments are not permitted.



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

Proximity to parks and open space, Commercial activity (retail, cafes, local businesses), Employment opportunities, Access to cycleways/routes, Walkability within the centre

**Other:**

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

Parks and playgrounds, 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?**

Footpaths.

High speed internet.

Parks.

Local food shops.

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

I note that with a small number of escalators much more of Wellington might be accessible for cycling.

There are parts of our neighbourhood where walking to town or walking at all requires walking on the road.

Library book delivery other than by electronic means

**Non-Compulsory Questions****1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?**

The fact you are consulting. That you are trying to develop a consensus and a vision

**2. What would you change or improve?**

Precinct studies that have over-riding densification goals alongside quality indicators that are about city livability and accessibility and liveliness

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

Sun, wind, outdoor livability. e.g. Khandallah township with careful vertical planning of buildings and large trees could be readily converted from a windy soulless nonentity to a welcoming village centre.

4.

5. Access between buildings to light and air - for good quality ventilation and livable dwellings. At present, as much as half the apartments designed in Wellington do not comply with the building code requirements for access to daylight. Many overheat because they are designed with openings only on one side, so ventilation is inadequate. Many small units are designed like hotel rooms, which are intended to be short term stay; long term livability and quality of life are ignored; and where there is a second bedroom it is often more of a windowless storage space.

6.

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.**

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.**

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.**

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.**

Strongly 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).**

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**

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?**

Given the large open space potential, delivering recreational opportunities and access for the wider Wellington City community, not just local residents.

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

Noise and general amenity for new houses. Double glazed houses will have to have the windows closed all the time and thus be fully mechanically ventilated for noise to be minimised.

I suggest that this area not be developed for housing but be converted

**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.**

The natural environment section of the plan is difficult to comprehend, and I have the impression it is not being coordinated in practical terms with the urban design objectives. Purple densification patchworks with no overlay of planting and increases in green space and proposed new walkways and cycleways that are not roadways argues for a separation of functions between parts of the WCC that will not provide a quality future city, but piecemeal and separate developments.

**Have you provided an attachment? No**

**From:** Nick Whalley [REDACTED]  
**Sent:** 01 October 2020 17:16  
**To:** BUS: Planning For Growth  
**Cc:** Tim Grafton; John Lucas  
**Subject:** Wellington City's Council's public consultation on Planning for Growth  
**Attachments:** Submission on Wellington City Council's public consultation on Planning for Growth.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Blue Category

Hi there,

Please find attached ICNZ's submission in respect of the above matter.

I'd be grateful if you could confirm receipt and that this is the right email address to send this to.

Please let me know if you have any questions about our submission.

Regards,

Nick Whalley  
Regulatory Affairs Manager  
Insurance Council of New Zealand  
[REDACTED]



Disclaimer: This email message (along with any attachments) is intended only for the addressee(s) named above. The information contained in this email is confidential to the Insurance Council of New Zealand and must not be used, reproduced or passed on without our consent. If you have received this email in error, informing us by return email or by calling (04) 914 2224 should ensure the error is not repeated. Please delete this email if you are not the intended addressee.

Insurance Council of New Zealand  
P.O. Box 474 Wellington 6140  
Level 2, 139 The Terrace

Tel 64 4 472 5230

email [icnz@icnz.org.nz](mailto:icnz@icnz.org.nz)

Fax 64 4 473 3011

[www.icnz.org.nz](http://www.icnz.org.nz)

## ICNZ's submission on Wellington City Council's public consultation on Planning for Growth

---

### Summary of submission

The Insurance Council of New Zealand (ICNZ) is taking this opportunity to submit on the Wellington City Council's public consultation on Planning for Growth. We commend the Council on taking a long view, planning out over several decades and welcome the primary focus on ensuring the built environment is resilient and based on good design.

By way of background, ICNZ represents general insurance and reinsurance companies in New Zealand, that is, we do not represent Life or Health insurers. ICNZ's members collectively write more than 95 percent of all general insurance in New Zealand and protect about \$1 trillion of New Zealanders' assets and liabilities.

### *Our focus*

Our focus in this submission is on natural hazard risks facing Wellington City arising from seismic and climate change impacts. Insurers play many beneficial roles for society. The primary one is to accept the transfer of risk, which in turn supports social and economic activity. So, indirectly by accepting risks, insurance also supports a vibrant and prosperous City. To enable insurance to carry out these important roles, it is critical that risk is managed well. It is fair to say that ICNZ and its members have been seeing the impacts of natural hazard risks and how this affects people, businesses and communities for some time. We also have a keen interest given our knowledge and experience when it comes to identifying and engaging with these risks and risk management, because of the role insurance plays in this context, and our desire to ensure this remains available and affordable (including to support lending).

### *The importance of risk management*

Best practice risk management operates under a widely accepted framework of four ways of treating it. Risks are either *avoided*, *controlled*, *transferred* or *accepted*. *Avoidance* is typically deployed where the frequency or consequences of hazard events makes alternative solutions for managing risk uneconomic. *Control* is applied where there are practical and cost-effective ways of mitigating the impact of a hazard. *Transfer* of the residual risk is typically priced and transferred to insurers who may in turn spread the risk further, where it is large, to global reinsurance markets. Some risk is simply *accepted* where the hazard events are either too frequent or too rare to price efficiently or treat by other means.<sup>1</sup> Further details about the principles of risk management are outlined below.

To treat risks it is essential to understand them through best science knowledge and experience.

---

<sup>1</sup> Wellington City Council's Mayor's Insurance Taskforce 2019

At the simplest level, for instance, we know that it is not a matter of if, but when, a major earthquake will strike Wellington and cause major damage. This could be triggered by a relatively remote event, such as occurred with the Kaikōura earthquake on 14 November 2016 when well over \$1 billion of insured losses occurred in the city. Alternatively, it could be triggered by any of the major fault lines that crisscross the Wellington region, including the Wellington fault line. Or it could result from a rupture at the northern end of the Alpine fault or in the Hikurangi trench, both of which are capable of unleashing earthquakes in excess of M8.0.

### *Being careful of where we build*

As you know, the Wellington City Council estimates that over the next 30 years, the capital will need to make room for 50,000 to 80,000 more people.<sup>2</sup> This will have a big impact on where and how people live, with more people expected to living in larger apartment buildings and buildings constructed on land that may not currently be deemed suitable. In working through these matters, careful consideration needs to be given to where these new and larger buildings will be located.

Experience from the Canterbury earthquakes of 2010-12, showed that the liquefaction of soft soils could create extensive damage to buildings. Indeed, decisions were taken to red zone the most vulnerable areas to *avoid* future risks and prohibit building construction on that land. We note that much of the Wellington CBD is constructed on reclaimed land which is subject to liquefaction. The sea level rise associated with climate change exacerbates this issue.<sup>3</sup>

Experience from Canterbury also provided insights about the challenges posed after an event with properties located on hillsides. Wellington has many more properties on hillsides than Christchurch. Some of the issues that present include the risk of hill-slide slips caused by the earthquake posing safety risks to undamaged structures requiring their evacuation. Insurance responds to physical damage to property. Delays in reinstating uninsured or underinsured retaining-walls, some of which may have shared ownership, affect the ability to consent remediation work of properties beneath for safety reasons.

Experience from the Canterbury earthquakes is informative in other ways. For instance, damage in the Christchurch CBD resulted in a decision to prohibit entry to any buildings within the four avenues area for over two and a half years. This affected access to over 1000 structures. This should be factored into how recovery efforts would cope with many thousands of Wellingtonians made homeless in similar circumstances.

Similarly, consideration must be given to avoid development in areas prone to other climate change impacts such as areas vulnerable to flooding, rising sea levels and coastal erosion. Further details about this issue are set out below.

The alternative (allowing development on such vulnerable land to proceed) will result in, at best, costly property repair costs and potentially uneconomic protection measures needing to be put in place or, at worst, lengthy interruption,<sup>4</sup> emergency responses costs and an eventual managed retreat and/or claims for compensation by property owners which the Wellington City Council (and ultimately its rate

---

<sup>2</sup> <https://planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/info-and-privacy-statement>.

<sup>3</sup> For example, in Tonkin and Taylor's June 2013 Report to the Wellington City Council on Sea Level Rise Options Analysis on page 8 indicates that "[a] rise in sea level and an associated rise in groundwater level can result in a reduced depth to the top of liquefiable soils. This reduced depth can result in greater surface damage in the event of liquefaction."

<sup>4</sup> By way of example, as noted above, the Canterbury earthquakes resulted in decision being made to prohibit entry to any buildings within the four avenues area of the Christchurch CBD for over two and a half years, affecting access to over 1000 structures. This should be factored into how recovery efforts would cope with many thousands of Wellingtonians made homeless in similar circumstances.

payers) will have to meet. There may also be insurance and lending availability and affordability issues to consider amongst other things.

#### *Appropriate building standards*

Experience from the Kaikōura earthquake shows that multi-storey structures built within the previous decade became constructive total losses,<sup>5</sup> even though they were constructed in excess of the New Building Standard (NBS). To explain, currently seismic performance for buildings is measured through an engineering assessment that compares the building to the NBS, and then rates it accordingly. However, New Zealand building codes that govern new building standards around seismic performance focusses heavily on life safety, rather than the capability of the building to avoid seismic damage (i.e. building resilience).<sup>6</sup>

Insurers price seismic risk for any given building based upon what they perceive is the likely cost of a claim in any given period informed by previous losses and modelling amongst other things.<sup>7</sup> From an insurance perspective, the NBS rating is not a helpful reference point as it cannot be meaningfully relied upon to inform decision-making about how likely it is that a particular building will suffer a loss.<sup>8</sup> The NBS rating is also of marginal utility to people looking to buy properties and property owners looking to undertake resiliency improvements.

For these reasons, it is concerning that NBS rating system is often used to market building resiliency and it should come as no surprise that insurers and reinsurers have little confidence in the NBS in assessing building risk and it is not a primary metric used by modelling companies who assess the probable maximum loss from major seismic events to inform reinsurance sale and purchases decisions. This has contributed to insurers limiting their exposure to commercial and some residential property in Wellington, Hawkes Bay, Marlborough and Canterbury. Insurance premiums for earthquake risk in these regions have also increased significantly since 2016 in part due to the uncertainty of future expected losses.

To address these issues New Zealand needs to adopt a new measure of building seismic performance. This measure should provide the building owner with an expected ratio of damage that could be expected from an earthquake event over a 1 in 250-year period.<sup>9</sup> This measure would also contain the present threshold measures for life safety. As the seismic performance of a building can be heavily influenced by the type of soil the building sits on, the engineer providing an expected seismic damage ratio would also need to factor soil performance in their assessment.

This new measure will enable insurers to make more accurate acceptance and pricing decisions and lead to the current loading applied due to uncertainty being removed. This will enable purchasers and building owners to better understand the risks and make more informed decisions about

---

<sup>5</sup> With damage being so significant that it was not worth repairing them.

<sup>6</sup> Ideally the building must not collapse but the level of damage sustained by it is not considered important in this regard.

<sup>7</sup> Other factors influencing pricing include competitive forces, global markets (including the reinsurance market), and insurers' risk appetite.

<sup>8</sup> For completeness, in making this assessment insurers may rely upon geocodes (which are sets of longitude and latitude of a physical address), plotting these on soil maps to inform exactly what type of soil a property is located on. They also rely on information about the date of the building's construction (as an estimation of its structural resilience, reflecting building standards operative at the time), as well as the height of a specific building and the material used in its construction amongst other things. Insurers may also take into consideration the state of adjacent properties too as the collapse of less resilient buildings may affect more resilient ones.

<sup>9</sup> The expected ratio of damage could be expressed as a percentage against the new replacement cost of that building. For example: 10% Expected Seismic Damage Ratio (10% ESDR). Insurers would in turn treat this as an expected 10% Probable Maximum Loss from an earthquake event over a 1 in 250-year period.



whether to buy and/or the merits of undertaking work to improve resiliency (including the impact of this work on their insurance) and tenants in choosing which properties they occupy.

#### *Non-structural seismic restraints*

Experience from earthquakes in Seddon, Seddon in 2013 and in Kaikōura informed insurers about the widespread damage caused by the failure of non-structural seismic restraints. These are installations that typically support all services including ceiling and partition wall fit-outs that can amount to 70 percent of the buildings overall replacement value. Experience points to widespread non-compliance with construction standards for the installation of these restraints.

#### *Multi-unit buildings*

Another Christchurch experience was the challenge of settling insurance claims in multi-unit buildings. Where cross-lease situations existed, delays occurred because individual unit owners all had to agree to any remediation solution which was complicated by having some units uninsured and other units covered under different insurance policies. Today, we are seeing developers of terraced houses with shared walls, foundations and rooves selling property under fee simple arrangements. The rise of these developments, which are not subject to the Unit Titles Act, create issues as there is no clear legal framework regulating long-term maintenance and funding, common property and insurance arrangements and owner decision-making. This effectively recreates the same challenging problem from a recovery perspective. Ideally, multi-unit buildings should be insured by one entity much the same as body corporates are.

#### *Fire following earthquakes*

The risk of fire following earthquake is a well-known phenomenon where gas reticulation is throughout a city. It is also noteworthy that insurers have encountered many instances where buildings have been constructed either without compliant passive fire structures or have had changes made some time after construction that lead to non-compliance. So, attention to the installation of fire safety measures and linked to seismic risk must be factored into resilience planning.

#### *These matters need to be addressed in the City's long-term planning*

The understandings and lessons learned outlined above need to be incorporated into the City's long-term planning for growth, to ensure buildings are constructed in the right places and to resilient specifications. This is critical to enable seismic risks to be controlled and to a level that will enable the transfer and/or the acceptance of risk to occur in a sustainable way.

It is also worth noting that Geological and Nuclear Science (**GNS**) research institute is currently upgrading its Natural Hazard Seismic Model (**NHSM**). This model has not been substantially upgraded for almost two decades and aspects of the model do not conform to best practice. This model performs several functions including informing building standards and insurance risk assessments. The Council should not make critical long-term planning decisions and resilience requirements until this upgrade is completed, which is expected in 2022.

A similar approach should be taken to climate change risks. In this submission, we identify the risk posed by sea-level rise as projected in a study undertaken by the National Institute of Water and Atmospheric (**NIWA**) research institute. We note the Council itself has developed visual scenarios to illustrate the extent of flooding caused by sea level rise in the decades ahead. Sea level rise will continue unabated for some centuries to come. Insurance provides coverage for unforeseen and accidental events. Sea-level itself is foreseeable, so we do not foresee insurance responding to

damage to property caused by sea-level rise alone. This means that unless this risk is avoided or effectively controlled, there will only remain the option to accept the risk. We suggest that the NIWA projections show that the damage due to sea-level rise will be so frequent later this century that it will be unsustainable to accept the risk.

We also note that sea-level rise raises the water table and increases the risk of flooding as well as liquefaction in higher risk areas. We are also mindful of the number of slips that occurred in Wellington during the winter of 2017 following the November 2016 earthquake. There is some evidence to indicate that these slips may have been caused by the earthquake weakening the soil/rock structure making it particularly vulnerable to heavy rain. So, seismic and climate change issues interact with each other in this respect.

#### *The remainder of this submission*

The remainder of this submission provides wider context and evidence of the critical need to ensure a robust resilient framework underpins the planning of Wellington's growth in the decades ahead in respect of climate change.

In terms of climate change, in summary, local government need to take a pro-active, co-ordinated, and long-term view when it comes to managing the real and significant impacts putting their people, businesses and communities at the heart of any decision-making. This includes:

- Well thought out and planned action and investments for adaptation and mitigation - reducing the extent of future climate change and its impacts.
- Grappling with the full impacts of climate change despite the uncertainty, noting that the potential impacts stretch across generations, with the economic, social and environmental impacts being too significant to ignore and only increasing if no action is taken.
- Adopt a holistic and flexible approach when working through these matters, leveraging a risk management framework and an adaptive pathways approach.

Local government is well placed to respond to climate change issues because effective responses in this regard are context specific and best addressed at the regional and local level. Additionally, local government has legal duties to act, doing so ensures resources are efficiently used and bypasses avoidable harm. This also aligns with communities increasing expectations for climate change action and ensures that insurance and lending remains available and affordable.

In our view there are five practical ways local government can advance climate change issues in the near term. These include:

- embracing collaboration and co-ordination on climate change issues within regions
- building specific knowledge about climate change and sharing it with the community and current and prospective property owners
- avoid developments in areas vulnerable to flooding, rising sea levels or coastal erosion, prioritising climate change mitigation and adaptation in planning and investment decisions regarding infrastructure, and
- ensuring buildings are resilient to climate change impacts.

## Background on climate change

### *Climate change is here*

Without question the full impacts of climate change is coming to bear around the globe and need to be taken extremely seriously. This includes:

- larger, longer and more extreme weather events occurring leading to increasingly frequent and extreme flooding and storm events including hailstorms, tornadoes and cyclones
- sea levels rising leading to issues with coastal flooding, storm surge and king tides, and
- associated increases in landslips and land erosion.

Climate change has also resulted in the increasing likelihood and severity of droughts, heat waves, water shortages and wildfire. Then there are the pest and health effects associated with higher temperatures.

Climate change responds to cumulative emissions, and unless these are close to zero increases over time, it is clear that the associated temperature increases will lead to the sea rising and that this will continue for centuries to come.<sup>10</sup> The same applies to the impact of emissions on weather patterns and increasingly frequent and extreme weather events.

There is clear international scientific consensus about the cause of climate change and its impact. In their special report on global warming of 1.5 °C, the Intergovernmental Panel on Climate Change (IPCC) highlights that:<sup>11</sup>

- There is a certain level of climate change already locked into the global climate system due to emissions to date.
- Every extra bit of warming matters, with warming of 1.5°C or higher increasing the risk associated with long-lasting or irreversible changes, such as the loss of ecosystems. Conversely, limiting global warming gives people and ecosystems more room to adapt and remain below relevant risk thresholds.

This report highlights several climate change impacts that could be avoided by limiting global warming to 1.5°C compared to 2°C, or more (noting that damage is not linear, with a 2°C or more increase in temperature being significantly worse than 1.5°C). However, this report indicates that even limiting global warming to 1.5 °C would require:

- Global net human-caused emissions of carbon dioxide (CO<sub>2</sub>) to fall by about 45 percent from 2010 levels by 2030, reaching 'net zero' around 2050, with the remaining emissions needing to be balanced by removing CO<sub>2</sub> from the air.
- "Rapid and far-reaching" transitions in land, energy, industry, buildings, transport, and cities and that.

The report records that even with 1.5°C of warming, there will be more frequent heatwaves and heavy rainfall events, more intense tropical cyclones, losses of some species, spread of diseases, and issues with water and food security.

---

<sup>10</sup> Choices made now are critical for the future of our ocean and cryosphere (25 September 2019), <https://www.ipcc.ch/2019/09/25/srocc-press-release/> and Preparing New Zealand for rising seas: Certainty and Uncertainty (November 2015) <https://www.pce.parliament.nz/media/1390/preparing-nz-for-rising-seas-web-small.pdf>.

<sup>11</sup> Global Warming of 1.5oC (January 2019), [https://www.ipcc.ch/site/assets/uploads/2018/10/SR15\\_SPM\\_version\\_stand\\_alone\\_LR.pdf](https://www.ipcc.ch/site/assets/uploads/2018/10/SR15_SPM_version_stand_alone_LR.pdf). More than 6,000 scientific references are cited in this report with thousands of experts and government reviewers worldwide contributing to it. The report has ninety-one authors and review editors from 40 countries.

New Zealand has committed to limit global warming to 1.5 °C and the ‘net zero’ emissions by 2050 target as a signatory of the Paris Agreement and then ratifying this.<sup>12</sup> These obligations are, in turn, reflected in the Zero Carbon legislation domestically.<sup>13</sup> This legislation provides for a centralised adaptation framework with the newly formed Climate Change Commission responsible for preparing a national climate change risk assessment every six years.<sup>14</sup> In response to this assessment, the Government will prepare a national adaptation plan with progress reports being provided every two years.

*New Zealand is significantly impacted by climate change*

As well as considering climate change as a general phenomenon and New Zealand’s international commitment to emissions reductions, it is also important to reflect on New Zealand’s vulnerability to climate change impacts. As a nation with a very long coastline and a high proportion of urban development in coastal areas,<sup>15</sup> New Zealand is particularly susceptible to sea levels rising, inundation, coastal erosion and other climate change impacts.

According to a Lloyd’s of London study, New Zealand is the second most vulnerable country in the world to natural disaster (behind Bangladesh).<sup>16</sup> In addition to the risks associated with New Zealand being in a high seismic zone (e.g. earthquakes, tsunamis and volcanoes), this is a reflection of the risk of climate change and weather events (particularly flood).

Looking at sea levels rising, a Parliamentary Commissioner Report for the Environment refers to a projected rise of 30 cm between 2015 and 2065.<sup>17</sup> This report also indicates that:

- By 2065 it is expected that today's 1:100 year flood event will occur annually in Wellington and Christchurch, every two years in Dunedin and every four years in Auckland if sea-levels rose by 30cm. A 40cm rise would see these events occur several times a year in Wellington and Christchurch. This will unlikely be much different for rural and provincial coastal areas.
- The estimated replacement value of buildings within 0.5m of the spring high tide mark is \$3 billion (equating to 9,000 homes). Buildings within 1.5m of the spring high tide mark is estimated at \$20 billion.<sup>18</sup>

New Zealand’s first national climate change risk assessment records that an estimated 675,500 New Zealanders live in areas already prone to flooding, and that over 72,000 are potentially impacted due to sea levels rising in the future.<sup>19</sup> It also records that nearly 50,000 buildings are currently exposed

---

<sup>12</sup> The Paris Agreement is the new global agreement on climate change. It was adopted by Parties under the United Nations Framework Convention on Climate Change (UNFCCC) on 12 December 2015. It commits all countries to act on climate change. In addition to the 2050 target, pursuant to this Agreement, New Zealand has also committed to reducing emissions by 30 per cent below 2005 levels, and 11 per cent below 1990 levels, by 2030.

<sup>13</sup> Climate Change Response (Zero Carbon) Amendment Act 2019.

<sup>14</sup> Details on the first risk assessment published 2 August 2020 are provided below.

<sup>15</sup> Coastal Hazards and Climate Change: A Guidance Manual for Local Government in New Zealand (July 2008), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/coastal-hazards-guide-final.pdf>

<sup>16</sup> A world at risk: Closing the insurance gap (2018), [https://www.lloyds.com/~media/files/news-and-insight/risk-insight/2018/underinsurance/lloyds\\_underinsurance-report\\_final.pdf](https://www.lloyds.com/~media/files/news-and-insight/risk-insight/2018/underinsurance/lloyds_underinsurance-report_final.pdf)

<sup>17</sup> Preparing New Zealand for rising seas: Certainty and Uncertainty (November 2015), <https://www.pce.parliament.nz/media/1390/preparing-nz-for-rising-seas-web-small.pdf>

<sup>18</sup> We expect that this analysis may understate matters somewhat as it does not consider storm surge, king tides, and heavy rainfall, as well as things like the ability of infrastructure such as stormwater drainage systems to respond.

<sup>19</sup> National climate change risk assessment for New Zealand - Main report (2 August 2020), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/national-climate-change-risk-assessment-main-report.pdf>

to coastal flooding, and at the highest range of warming scenarios, that could rise to nearly 120,000 this century.

Preliminary research shows we could lose 125,600 buildings, at a replacement cost of \$38 billion, if the sea level rose 1m.<sup>20</sup>

It is important to reflect on the fact that the above research does not provide a full picture of climate change impacts - focussing only on the consequences of sea levels rising. It also does not consider costs associated with local government owned infrastructure (of which up to \$14 billion is estimated to be at risk from sea level rise),<sup>21</sup> ongoing development and growth,<sup>22</sup> broader economic and social impacts (including impacts to people, businesses and communities) and to the natural environment.

Consideration also needs to be given to the fact that New Zealand's current infrastructure is not well positioned to manage the impact of climate change. Specifically, for the most part our aging storm and wastewater networks are only designed to cope with today's 1:10 year event. Much of this is also gravity dependent and vulnerable if running-off in low lying coastal areas. The quality of some of the older infrastructure is also somewhat unknown.

Consistent with this broad view of climate change impacts, New Zealand's first national climate change risk assessment refers to ten major threats in need of urgent action within the next six years falling under five categories:<sup>23</sup>

- **The natural environment**, including coastal ecosystems and indigenous ecosystems. Risks here were described as having major consequences.
- **The human domain**, including social cohesion, displacement of communities and the entrenchment and further opening up of inequalities. These were seen as risks with extreme consequences.
- **The economic domain**, including costs associated with disaster relief and long-term changes, and the risk of instability in the financial sector.
- **The built environment**, including infrastructure and buildings being vulnerable to sea level rise and more extreme weather conditions generally – this was described as being an extreme risk.
- **The governance domain**, in respect of which reference was made to “maladaptation” (actions that may lead to increased risk of adverse climate-related outcomes) and the risk that climate change impacts across all domains will be exacerbated because current institutional arrangements are not fit for adaptation.

The report also highlights the potential cascading nature of climate change impacts. For example, where an extreme weather event impacts a region's potable water supply which in turn negatively impacts the ability to earn income, quality of life and public health.<sup>24</sup>

---

<sup>20</sup> From the National Institute of Water and Atmospheric Research (NIWA). 125,000 buildings at risk from first metre of sea level rise (21 November 2018), <https://www.newsroom.co.nz/125000-buildings-worth-38bn-at-risk-from-first-1m-sea-level-rise-draft-report>

<sup>21</sup> \$14 billion of council infrastructure at risk from sea level rise (31 January 2019), <https://www.lgnz.co.nz/news-and-media/2019-media-releases/14-billion-of-council-infrastructure-at-risk-from-sea-level-rise/>

<sup>22</sup> The Productivity Commission projects that over the next 30 years have 28 urban areas in New Zealand experiencing population growth of 20% or more and 61 experiencing depopulation, <http://www.chapmantripp.com/publications/building-resilience-to-climate-change-local-government-the-front-line-in-the-climate-change-response>

<sup>23</sup> National climate change risk assessment for New Zealand - Main report (2 August 2020), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/national-climate-change-risk-assessment-main-report.pdf>.

<sup>24</sup> National climate change risk assessment for New Zealand - Main report (2 August 2020), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/national-climate-change-risk-assessment-main-report.pdf> Figure 10.

The fact that New Zealand is in a high seismic zone also increases the impact that climate change will have. For example, analysis of pre- and post-earthquake data from the 2010 and 2011 Christchurch earthquakes revealed that seismic shaking, tectonic movements and/or liquefaction associated with these earthquakes led to land surface and waterway deformation and substantial floodplain subsidence.<sup>25</sup> In turn, this greatly enhanced the risk posed by floods, storm surges and the sea-level rising. The likelihood and severity of impact of tsunamis also increases as the sea level rises.

Stepping back, and taking the above into account, it should come as no surprise that the cost to New Zealand of climate change is significant and growing. For example, nationwide insured costs of extreme weather events are as follows (noting that this somewhat understates the issue given other climate change related events and uninsured costs are excluded):<sup>26</sup>

| Year | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020                         | Average               |
|------|------|------|------|------|------|------|------|------------------------------|-----------------------|
| \$m  | 175  | 153  | 115  | 52   | 242  | 226  | 166  | 77.6*<br>estimate<br>to-date | 161*<br>2013-<br>2019 |

From 2003-2015 insured costs of floods alone averaged \$75m. However, Water NZ estimates that this is about 40% of the total cost (i.e. \$190m per year).<sup>27</sup>

The Ministry of the Environment have advised that, in the past 10 years, the cost of weather events to our transport network alone has risen from about \$20 million per year to over \$90 million per year. Additionally, they have advised that the 2012-2013 drought in the North Island cost the economy around \$1.5 billion, with climate change only making droughts more likely.<sup>28</sup>

### The role of local government with climate change

ICNZ considers that local government should take a pro-active, co-ordinated and consistent approach to engage with the clear challenges posed with climate change highlighted above. This involves investigating, analysing and managing risk associated with climate change within your region and taking a long-term view.

In practical terms the key principle here is, while we cannot control the forces of nature associated with climate change, we can reduce their impact significantly through well thought out and planned action and investments for mitigation and adaptation. Expanding upon these concepts:

- **Mitigation** involves action to reduce emissions and modify conduct, with a view to reduce the likelihood of further climate change which may have more severe, damaging and costly impacts.
- **Adaptation** involves action to address unavoidable climate change, minimising risk and disruption and strengthening resilience and preparedness in the face of inevitable climate change impacts.

Both matters should have a balanced and equal focus. Failure to sufficiently focus on adaptation could lead to significant economic loss or disruption which in turn could undermine efforts to reduce

<sup>25</sup>The sinking city: Earthquakes increase flood hazard in Christchurch, New Zealand (April 2015), <https://www.geosociety.org/gsatoday/archive/25/3/pdf/gt1503-04.pdf>. See also Report of the Public Inquiry into EQC (March 2020), <https://eqcinquiry.govt.nz/assets/Inquiry-Reports/Report-of-the-Public-Inquiry-into-EQC.pdf>.

<sup>26</sup> Cost of natural disasters, <https://www.icnz.org.nz/natural-disasters/cost-of-natural-disasters/>

<sup>27</sup> Water NZ (October 2015), [https://www.waternz.org.nz/Attachment?Action=Download&Attachment\\_id=235](https://www.waternz.org.nz/Attachment?Action=Download&Attachment_id=235)

<sup>28</sup> Adapting to Climate Change in New Zealand (31 May 2017), <https://www.mfe.govt.nz/sites/default/files/media/adapting-to-climate-change-stocktake-tag-report-final.pdf>



emissions. Conversely, failure to sufficiently focus on mitigation may necessitate more urgent and extreme adaptation measures. Local and central government need to work together here. While central government has the central role to play with mitigation, local government is well placed to contribute as both a provider of infrastructure and service by virtue of its influence over activities.

One of the challenges of implementing adaptation in this context is the complexity of climate change and the uncertainty about what its full impacts will be and when they will occur over a long time frame. However, this uncertainty and long horizon is not something to shy away from or ignore. To the contrary, in our view this is something that should be grappled with now head on, the sooner the process begins the better, noting that extreme events can and do happen now. Also, ongoing potential impacts will stretch across generations, with the economic, social and environmental impacts being too significant to ignore. These risks only increase if no action is taken and become more costly to address later.

In investigating climate change matters reliance should be placed on the best available science and scenario planning, to understand the widest possible range of what could happen, being explicit with others about what assumptions have been made and being prepared for debate and discussion. The position should also be regularly monitored and reviewed.

In our view it is also important to take a holistic position – having regard to how individuals, businesses and communities are likely to behave. With that in mind, it is critical that you bring people on the climate change journey, sharing what is known about the impact of climate change in your region based on evidence and getting them to meaningfully contribute to the solution, putting all options on the table, noting that initiatives on the ground are the most effective when they are driven by motivated and engaged people who can see a way forward and do not consider that their interests are threatened.<sup>29</sup> Planning and investments should also involve consideration of what must be protected and what is a tolerable level of loss. Again, this requires community conversations (factoring in human, social, natural, physical and financial capital).

In considering climate change issues it may be helpful to analyse and prioritise matters using a risk management framework,<sup>30</sup> including an assessment of the likelihood and consequence of each risk with reference to the following treatment options:

|         |  |
|---------|--|
| Avoid   | Changing plans to circumvent the problem. This may involve developing an alternative strategy that is more likely to succeed but have a higher cost. This may require a judgement call weighing the cost of avoidance against the cost of impact if not treated. In a climate change context, this could involve relocating or abandoning areas as retreat is virtually inevitable.  |
| Control | Taking steps to reduce the impact and /or likelihood of impact. Elements of this option relate to mitigation or adaptation referred to above, noting whereas mitigation relates to reducing the likelihood of something occurring (i.e. by reducing emissions leading to further climate change) adaptation relates to reducing the inevitable impact of climate change. In a climate change context, this may involve better protecting assets or modifying them so they are more resilient to the impacts of climate change. |
| Accept  | Assuming the chance of the negative impact and taking this into account.   |

<sup>29</sup> See How to Talk About Climate Change: A Toolkit for Encouraging Collective Action (31 July 2019), <https://www.oxfam.org.nz/news-media/reports/talking-about-climate-change/> for more details in this regard.

<sup>30</sup> See for sample risk management framework produced by Massey University available here: <https://www.massey.ac.nz/massey/fms/PolicyGuide/Documents/Risk%20Management/Risk%20Management%20Framework.pdf>. Also see, by way of example, the Risk Management Framework, Policy and Guidelines put together by the Thames Coromandel District Council available here: [https://docs.tcdc.govt.nz/store/default/2914590?fbclid=IwAR0cHOJtQK9I5bNZDTPkHr8AmlNwefAzPVx44SnnwHowq\\_0F3bM-TqsHfA](https://docs.tcdc.govt.nz/store/default/2914590?fbclid=IwAR0cHOJtQK9I5bNZDTPkHr8AmlNwefAzPVx44SnnwHowq_0F3bM-TqsHfA)

|          |  |
|----------|--|
| Transfer | Outsourcing the risk (or a portion of it) to a third party to manage (e.g. via insurance). Simply put, this involves paying someone else (e.g. an insurer) to accept the risk. However, risks will not be transferable if they are not sufficiently managed. |
|----------|--|

In planning for climate change local governments should also consider adopting an adaptive pathways approach.<sup>31</sup> This involves testing a range of responses to climate change against possible future scenarios and then mapping pathways that will best manage, reduce or avoid risk. Under this approach a plan is subsequently developed with short-term actions and long-term options with pre-defined trigger points when decisions can be revisited. Ways forward can then be identified despite uncertainty, with flexibility provided should the agreed course of action need to change (e.g. because more scientific information or new technology becomes available). By foreshadowing future change at the outset without committing to a particular course of action long-term, this approach helps avoid locking in investments early that may be later rendered obsolete or which make future adjustments difficult and/or costly.

### Why it is important for local government to act on climate change

Drawing upon the call for action outlined above, it is also important to reflect on the reasons why local government should act on climate change. The most obvious reason being effective responses to climate change are context specific and accordingly best addressed at a regional level. Other reasons are outlined below.

*Local government has a legal requirement to do so*

Local government has a number of statutory duties related to climate change. This includes:

- Under the Local Government Act 2002:
  - Meeting the current and future needs of communities for ‘good-quality’ local infrastructure, public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses.<sup>32</sup> ‘Good quality’ in this context means infrastructure, services and performance that is efficient, effective and appropriate to meet present and anticipated future circumstances.<sup>33</sup>
  - Avoiding or mitigating natural hazards, which include subsidence, sedimentation, wind, drought, fire and flooding.<sup>34</sup>
  - Taking into account the interests of future as well as current communities, and diversity within such communities in decision making.<sup>35</sup>
- Under the Resource Management Act:
  - Having regard to the maintenance and enhancement of the quality of the environment, and to the effects of climate change.<sup>36</sup>

<sup>31</sup> Preparing for coastal change: A summary of coastal hazards and climate change guidance for local government (December 2017), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/coastal-hazards-summary.pdf>. See also Supporting decision making through adaptive tools in a changing climate: Practice guidance on signals and triggers (2020), <https://www.deepsouthchallenge.co.nz/sites/default/files/2020-03/Supporting%20decision%20making%20through%20adaptive%20tools%20in%20a%20changing%20climate%20Practice%20guidance%20on%20signals%20and%20triggers.pdf>

<sup>32</sup> Section 10(1).

<sup>33</sup> Section 10(2).

<sup>34</sup> Section 11A.

<sup>35</sup> Section 14.

<sup>36</sup> Section 7.



- Controlling the effects of the use or development of land, including avoiding or mitigating natural hazards.<sup>37</sup>
- Considering the effects of a changing climate on communities and incorporating climate change into existing frameworks, plans, projects and standard decision-making procedures including activities such as flood management, water resources, planning, building regulations and transport.<sup>38</sup>

Additionally, under the New Zealand Coastal Policy Statement 2010, local government is required to ensure that coastal hazard risks are managed and identified for a period of at least 100 years, taking account of climate change, and applying a precautionary approach.<sup>39</sup>

The aforementioned Zero Carbon legislation also contains obligation for local government. Specifically, under this legislation the Minister or Commission have the power to require local government organisations, and “lifeline utility providers” to provide information including the organisations’ assessments of the risks climate change poses to their functions, the organisations’ proposals and policies for adapting to climate change, and their progress towards implementing these.

There has also been recent commentary about the responsibility of company directors, investment managers, professional trustees and other professionals with fiduciary obligations to consider climate change risk in their decision making and take appropriate action.<sup>40</sup> This includes officers, trustees or directors of council controlled organisations (CCOs).

One of the challenges local governments need to work through for planning and investment purposes is the different and sometimes short timeframes set out in the applicable legislation.<sup>41</sup> As outlined above, the ICNZ’s view is that a co-ordinated, consistent and holistic approach should be taken looking at climate change issues with a long-term perspective in mind. This includes land-use decisions, district plans, urban development, energy use, infrastructure and waste and transport management.

*Doing so ensures the efficient use of resources and reduces harm*

Another key reason for action is that adapting to climate change is efficient and reduces avoidable harm. Numerous studies have shown that investment before disaster strikes is substantially more cost effective than only responding afterwards.<sup>42</sup> Specifically, it is estimated that every \$1 invested in pre-

<sup>37</sup> Section 31.

<sup>38</sup> Climate change adaptation and local government, <https://www.mfe.govt.nz/climate-change/climate-change-and-government/adapting-climate-change/adaptation-and-local-government>. Also see section 30 and 62.

<sup>39</sup> New Zealand Coastal Policy Statement 2010, <https://www.doc.govt.nz/about-us/science-publications/conservation-publications/marine-and-coastal/new-zealand-coastal-policy-statement/new-zealand-coastal-policy-statement-2010/>. Specific requirements of note include policies 3 (precautionary approach), 7 (strategic planning), 24 (identification of coastal hazards), 25 (subdivision, use, and development in areas of coastal hazard risk), 26 (natural defences against coastal hazards) and 27 (strategies for protecting significant existing development from coastal hazard risk). This statement is to be applied as required by the Resource Management Act 1991 by persons exercising functions and powers under that legislation.

<sup>40</sup> Chapman Tripp’s 2019 legal opinion to The Aotearoa Circle

[https://static1.squarespace.com/static/5bb6cb19c2ff61422a0d7b17/t/5db95b00780a6c1bc1af5743/1572428552373/SFF\\_Climate+Change+Risk+Legal+Opinion\\_301019.pdf](https://static1.squarespace.com/static/5bb6cb19c2ff61422a0d7b17/t/5db95b00780a6c1bc1af5743/1572428552373/SFF_Climate+Change+Risk+Legal+Opinion_301019.pdf). See also MinterEllisonRuddWatts Litigation Forecast for 2020 <https://www.minterellison.co.nz/our-view/2020-litigation-forecast-climate-change-risks-for-companies-and-directors>

<sup>41</sup> For example, the Local Government Act 2002 refers to a Long-term Council Community Plan with an anticipated 10 year minimum timeframe. The Resource Management Act 1991 provides for Regional Policy Statement and Regional and District plans referring to 10 year timeframes. This contrasts with requirement under the Local Government Act 2002 to produce an Infrastructure Strategy identifying significant infrastructure issues (including ones related to flooding) over at least a 30 year period. Also, there is the former Building Act 1991, which was based on an assumed building life of 50 years. While the current Building Act 2004 does not include an assumed building life many structures are intended to, or do, last a century or more.

<sup>42</sup> For example see Building our nation’s resilience to natural disasters (June 2013), [https://www2.deloitte.com/content/dam/Deloitte/global/Documents/About-Deloitte/dttl\\_crs\\_humanitarian\\_australia\\_resilience.pdf](https://www2.deloitte.com/content/dam/Deloitte/global/Documents/About-Deloitte/dttl_crs_humanitarian_australia_resilience.pdf). See also 34 below.

event prevention will save \$5 in post-event costs and avoid the wider social and economic disruption.<sup>43</sup> It is important to reiterate in this context that when a natural disaster strikes, in addition to costs associated with at-risk local government owned infrastructure and the emergency response, there is a significant wider economic, social and community impact that it is difficult to put a price on. Lives can be lost, homes destroyed, utility systems wrecked, business insolvency and jobs lost. Then there is the mental trauma and stress families suffer as they try and pull their lives back together and the impact to the natural environment. The more that can be done to avoid or control the risks associated with climate change upfront and reduce these economic and social impacts the better.

Fortunately, the long horizon of some climate change impacts means that, in conjunction with an adaptative pathways approach, in some cases an incremental investment strategy can be deployed with costs allocated over the timeframe of potential climate change impacts. As highlighted above, the earlier this planning occurs, the less costly it will be later on.

#### *Communities are increasingly demanding action*

Property owners and communities are already facing the impacts of climate change and it should come as no surprise that there is also strong and growing public consensus within New Zealand for action on climate change including action by local government. An insurance company's recent climate poll indicates that:<sup>44</sup>

- 79% of respondents consider that climate change is important to them personally (consistent with the 2019 result and up from 72% in 2018).
- 68% of respondents have become more concerned about climate change over the past few years (down slightly from 69% in 2018 but up from 60% in 2018).
- 68% of respondents consider that local councils are responsible for taking action on climate change (which is consistent with the 2019 result but up from 48% in 2018).

This poll also indicates that 79% of respondents believe that local councils should take a long-term view on climate change, with 80% indicating that local councils should provide information on the local impacts of climate change.

#### *Doing so ensures insurances remains available and affordable*

Another key reason for pro-active action by local government on climate change is that this ensures the associated risks are well managed so they remain partly transferrable to insurers. In turn this will:

- Ensure that insurance remains available and affordable for people and businesses within your community.
- Avoid a situation where climate change related risks become too great to be transferred to insurers and must be self-insured instead. This would put considerable strain on people, businesses and/or local and central government, particularly when financial resources are already stretched. This may also involve situations when the burden of covering losses falls with local and

<sup>43</sup> Flood Resilience in Numbers: 1-5-13-87-88 The Zurich Flood Resilience Alliance as a mode presentation, Berlin (May 2017). In this presentation it is also commented that they see only 13% going into pre-event resilience & risk reduction, 87% go to post-event relief.

<sup>44</sup> Adapting to climate change July 2020, <https://www.iag.co.nz/content/dam/iag-nz-main/corporate-documents/Climate%20Change%20Survey%20Detailed%20Results%202018-2020.pdf>. This survey was of 1,000 people and ran between 18 and 24 June 2020. It has a margin of error of 3.1%.

central government (and in turn ratepayers and taxpayers generally) because the specific people and businesses impacted lack sufficient resources to cover these themselves.<sup>45</sup>

The importance of keeping insurance available and affordable is well demonstrated by research,<sup>46</sup> with well insured countries spending less on emergencies which frees up capital for investment and growth.

To understand the connection between climate change and the availability and affordability of insurance in more detail it is helpful to consider how an insurer looks at risk. In particular:

- Insurance only transfers risk, it does not manage or reduce it. An insurer business will not take on a risk that it is not sustainable for it to do so in the longer term. In so far as a risk is taken on by an insurer, the higher the risk the higher the premium charged. If over time risks are not addressed and allowed to get worse, to ensure risks taken on remain sustainable, higher premiums or excesses are applied. In extreme cases cover for some risks may be removed entirely, on the basis that it is not viable at all.
- While traditionally insurers assessed risk looking backwards (based on claims received), their decision making today also increasingly involves forward looking predictive models leveraging technology and the latest scientific insights, including ones related to climate change (for example, flood and weather pattern modelling). Insurers are also increasingly using more sophisticated and granular data to form a much more specific picture about a particular risk and then underwrite it accordingly (either by imposed specific terms or conditions and/or via risk-based pricing).<sup>47</sup>
- From a first principles perspective, insurance follows the pooling principle ‘the many paying for the unfortunate few’. While this works well for a diverse range of accidental (i.e. sudden, unintended and unforeseen) events where the numbers suffering losses at any one time is small (e.g. a vehicle crash or house fire), this does not work well for wide scale and predictable climate change events. For example, coastal properties in a certain area known to be at risk of coastal erosion and/or tidal inundation. Additionally, arguably losses connected with the sea level rising or coastal erosion are not sufficiently accidental because they are neither sudden or unforeseen. Insurers also generally exclude cover for land damage.<sup>48</sup>
- Lastly, whereas insurance responses to climate change operate on short annual renewal cycles, as outlined above, local government planning for climate change operates on very long timeframes, with potential impacts stretching across generations.

In light of the above, it should come as no surprise that in other countries where flooding has been an issue it has been removed from standard insurance offerings because doing so has not been sustainable, being removed entirely or offered instead as an optional extension for additional

---

<sup>45</sup> In this regard also see comments from the New Zealand Productivity Commission in their report Local government funding and financing (November 2019), [https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report\\_Local-government-funding-and-financing.pdf](https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report_Local-government-funding-and-financing.pdf).

<sup>46</sup> Lloyd’s Underinsurance Report 2018, prepared by the Centre For Business and Economic Research, [https://www.lloyds.com/~/\\_media/files/news-and-insight/risk-insight/2018/underinsurance/lloyds\\_underinsurance-report\\_final.pdf](https://www.lloyds.com/~/_media/files/news-and-insight/risk-insight/2018/underinsurance/lloyds_underinsurance-report_final.pdf). This report reinforces the correlation between low insurance penetration and taxpayers required contribution post-disaster.

<sup>47</sup> Risk-based pricing results in increased premiums for high-risks and promotes low risk behaviour. This contrasts with a community-based pricing approach where everyone pays the same rate regardless of the varying risk, with people in low risk areas effectively paying higher premiums to subsidise people in high risk areas who have no premium incentive to reduce their risk.

<sup>48</sup> Land is insured by EQC provided this is within the residential property boundary and either: (1) under the relevant home and outbuildings, (2) within 8ms of these buildings; or (3) under or supporting your main accessway up to 60ms from the home. <https://www.eqc.govt.nz/what-we-do/land-cover>.

premium.<sup>49</sup> Consistent with this, property damage from coastal erosion and “actions by the sea” is excluded from the majority of home insurance policies in Australia.<sup>50</sup> Local government action to manage the impact of climate change risks is critical to ensuring the same thing does not happen in New Zealand.

#### *Ensuring lending remains available*

Another reason for action connected with the availability of insurance is property lending. Generally, banks and other lenders require insurance to be in place for property that secures the lending. The banking sector alone lends over \$280 million in residential mortgage lending in total.<sup>51</sup> Substantial lending is also secured against commercial properties.

If insurance and therefore lending is reduced in an area within your region due to climate change risks, this will restrict growth, deflate people and business’ property values (and in turn rateable income).

Another issue is the asymmetry of the term of lending and insurance. Unlike mortgage lending, which is generally structured over several decades, insurance is generally renewed annually and can be withdrawn if risk gets too high. Accordingly, the risk that lenders are left with an uninsured secured asset in the future due to evolving climate change risks is likely to flow through to higher deposit requirements and lending rates and short loan terms, restricting growth, deflating property values and rateable income.<sup>52</sup>

#### *Action is required to manage local government liability exposures*

Another important reason for action is local government’s potential liability exposures related to climate change. For example, the risk of an allegation being made that a local authority failed to have sufficient regard to known climate change issues in decision making or planning and this led to a third party suffering third party property damage or financial loss. This could lead to substantial defences costs being incurred, and liability payments being made, from ratepayer funds.

To this end, a recent presentation by a Queens Counsel to a local government audience records that:<sup>53</sup>

- In addition to issues associated with breaching statutory duties as outlined above, common law is changing and the Judiciary appears to have an increasing appetite to entertain arguments about climate change in common law.<sup>54</sup>
- While current local government litigation mostly relates to decisions to limit development (short-term judicial review), in the future it seems likely to extend to the consequences of allowing development and failing to implement adaptation measures (e.g. from

<sup>49</sup> For example, until the 1960s US had all risks house policies as we have in New Zealand to <https://www.rbnz.govt.nz/statistics/c31> day. However, frequent flooding events drove the predictable premium response until insurance became unaffordable.

<sup>50</sup> Beachfront homeowners at risk of losing millions as properties uninsurable against the sea (28 July 2020), <https://www.news.com.au/finance/business/beachfront-homeowners-at-risk-of-losing-millions-as-properties-uninsurable-against-the-sea/news-story/2d9d3f73f7a03f248448f62731800a12>.

<sup>51</sup> New and existing residential mortgage lending by payment type - C32 (24 July 2020), [https://www.rbnz.govt.nz/statistics/c32?fbclid=IwAR2lu\\_C8v\\_i3h94bdudJo2RMDQahFI07N9QbAjTDTToShI\\_I8I42MjD0yE5Y](https://www.rbnz.govt.nz/statistics/c32?fbclid=IwAR2lu_C8v_i3h94bdudJo2RMDQahFI07N9QbAjTDTToShI_I8I42MjD0yE5Y).

<sup>52</sup> Also in this regard see comments from the New Zealand Productivity Commission in their report Local government funding and financing (November 2019), [https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report\\_Local-government-funding-and-financing.pdf](https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report_Local-government-funding-and-financing.pdf).

<sup>53</sup> “Climate Change Adaptation” session of the Local Government New Zealand Rural and Provincial Sector Meeting, Wellington (7 March 2019) <https://www.lgnz.co.nz/assets/Uploads/f488365773/Climate-change-litigation-Whos-afraid-of-creative-judges.pdf>.

<sup>54</sup> See also the paper ‘Climate Change and the Law’ produced by three justices of the Supreme Court available here: <https://www.courtsofz.govt.nz/assets/speechpapers/ccw.pdf>.

homeowners suffering physical and economic consequences of climate change in the longer term).

- While there has not been any large damages claims in relation to failure to implement adaptation measures in New Zealand to date, this may be only a matter of time.

Insurance may also have a role to play here and to that extent the same principles as outlined in the insurance section outlined above apply equally here. Namely, if local government's liability exposures associated with climate change are not sufficiently managed this may lead to liability insurance becoming unaffordable or unavailable. Liability insurance also commonly excludes reckless or intentional conduct, which may be an issue if the climate change impacts are known but ignored.

If the relevant liability insurance is not in place and a large climate change related event occur, this could put extreme pressure on local governments already strained resources – diverting ratepayer funds to fight litigation that otherwise could be used to repair local government infrastructure and fund the emergency response.

### **Specific areas for local government action on climate change**

Reflecting on the above, we consider there are five practical ways local government can advance climate change issues in the near term, focusing on matters directly within their control. We acknowledge that in some regions the matters referred to may be already well advanced, while others may be just at the start of their climate change journey.

#### *Embracing collaboration and co-ordination*

A key area of action by local government in our view is leading and embracing collaboration and co-ordination on climate change within the region. While local government has a great deal of autonomy in deciding what to do regarding climate change, unfortunately this means there is a lack of consistency across the country in terms of the approaches being adopted. Things may be further complicated by different bodies (i.e. regional/unitary, district or city councils) having different but overlapping roles and responsibilities.<sup>55</sup> An added complication is that climate change and its impacts do not respect local government boundaries.

To combat this, all elements of local government within a region need to collectively work together – having regard to their specific functions/roles whilst leveraging their combined leadership, resources, knowledge and expertise. This collective work should include:

- Establishing a consistent understanding of how to identify climate change risks, undertake risk modelling, planning and the appropriate terminology and methodologies, drawing upon approaches set out by Local Government New Zealand, other local and central government (including the Ministry for the Environment and the Climate Change Commission).
- Developing a shared understanding of overarching climate changes issues in the region and what should be done to address them, with co-ordinated roles and accountabilities for the various organisations, noting that all of local government is charged with meeting the current and future needs of communities.<sup>56</sup>

It is important that mitigation and adaptation measures are considered together in a co-ordinated fashion that involves all relevant stakeholders, noting that while mitigation on climate change (reducing emissions) is principally being progressed at a national and central government level much

<sup>55</sup> For example, while regional councils focus on decisions that relate to resource use and hazard management, district or city councils focus may focus on core services that can impact on resources including land, water and coastal areas.

<sup>56</sup> Local Government Act 2002, section 10(1)(b).

of the decision making and implementation around adaptation occurs at the local government level. Working together enables a full picture of climate change to be formed and a balanced approach to be taken when prioritising responses and allocating responsibilities and accountabilities.

For efficiency and economies of scale, local government should also look for opportunities to partner up or draw upon insights from other regions grappling with similar issues or who have done so in the past.

If good collaboration and co-ordination is already occurring within your region (along the lines described above), now is a good opportunity to 'take this to the next level' by formalising these arrangements.

#### *Building knowledge about climate change and sharing it*

Local government also needs to focus on identifying and filling gaps in regional knowledge about climate change,<sup>57</sup> investing in specialist personnel, training and additional research (leveraging the latest scientific insights and technology) to gain a better understanding in this regard. Improving the information available will enhance the efficacy of the actions local government will be able to take. In undertaking this work, again regard should be had to successful approaches others have adopted so as to co-ordinate and ensure consistency and efficiency as much as possible.<sup>58</sup>

Local government should also champion public education on climate change within their regions. This involves actively looking for opportunities to share what it knows about climate change risks within the region to individuals, businesses and communities in a form they can easily engage with – bringing them on the climate change journey and giving them better information to make decisions and take personal action. While there has been going growing awareness of climate change issues, many within the community still do not fully understand the specific risks climate change poses to them.<sup>59</sup> Simply put, people cannot be expected to manage and reduce their climate change risks if they do not know what these risks are.

From specific property information perspective, the goal should be for all current and potential property owners to have easy access to good quality, transparent and consistent information about all-natural disaster risks a particular property faces including the climate change related ones.

While we acknowledge providing more information about property related natural disaster risks may result in challenges, in our view, local governments should not shy away from doing so. Providing this information enables individuals and businesses to make more decisions and the market (including insurers<sup>60</sup> and lenders) to price for this risk signal. Just like other natural hazard risks, climate change

---

<sup>57</sup> This issue is compounded by the fact that there is currently no national public database of natural hazard risks. While this work has recently stalled due to a lack of government funding, ICNZ has been advocating for work to be undertaken in this regard through the ReZealiance project. The intention of this project is to use publicly funded research undertaken by GNS, NIWA and LINZ to produce a natural risk database that many stakeholders including homeowners, businesses and central and local government can use. Another challenge is that there is no consistent hazard information for assessing the exposure of the built environment at a national scale, <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/national-climate-change-risk-assessment-new-zealand-snapshot.pdf>.

<sup>58</sup> As outlined by the Productivity Commission, specific consideration could be given to developing regional spatial plans which will assist with efficient use of resources and aid in coordinating efforts across councils and with central government. These plans can also draw upon insights from the Climate Change Commission's national climate change risk assessments so that responses to climate change occur in a co-ordinated fashion, [https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report\\_Local-government-funding-and-financing.pdf](https://www.productivity.govt.nz/assets/Documents/a40d80048d/Final-report_Local-government-funding-and-financing.pdf).

<sup>59</sup> For example, IAG's climate poll 2020 records that only 34% of individuals indicated they had all the information they needed to make decisions to reduce the impact of climate change on themselves.

<sup>60</sup> Property owners are generally required to disclose to their insurer if their property has been identified as being at risk from any natural hazard by their local Council, through information being placed on the properties LIM or by way of a notice on the property title under section 74 of the Building Act 2004. This notice alerts prospective purchasers and others with an interest in the property (such as

impacts are likely to have an impact at some future point, if they have not done so already. The alternative is that the added costs associated with the property due to climate change risk remain hidden and ignored, with local government and ratepayers ultimately subsidising arrangements (via future infrastructure costs, protection measures, emergency response costs etc). Providing this information also incentivises people to act in a more resilient manner (e.g. to undertake the appropriate protection measures or factoring these before making decisions).

In the property information context, how things are framed can be very important. For example, a '1:100-year event' may mislead people into thinking it will not happen in their lifetime when it could happen tomorrow. Consider framing things as 'a 1 in 4 chance of an event over the term of a 25 year mortgage' or 'if there are 100 locations that face 1:100 year events in New Zealand, then one will almost certainly happen in the next 12 months'. Another obvious consideration is that, due to climate change, these low probability events are becoming increasingly common and the associated probability may need to be re-assessed.

#### *Avoid development in areas vulnerable to flooding, rising sea levels or coastal erosion*

Wherever possible local governments should avoid development in areas vulnerable to flooding, rising sea levels or erosion. This should be a fundamental element of a local government's adaptation framework to bypass costly and avoidable climate change risk which otherwise local governments (and ultimately ratepayers) will have to meet. There is growing public awareness and recognition of this issue.<sup>61</sup>

The alternative (allowing development in such areas to proceed) will result in, at best, costly and potentially uneconomic protection measures needing to be put in place or, at worst, interruption, emergency responses costs and an eventual managed retreat and/or claims for compensation by property owners which local governments (and ultimately rate payers) have to meet. There may also be insurance and lending availability and affordability issues to consider amongst other things. If developments in areas vulnerable to flooding, rising sea levels or coastal erosion are being considered, the full cost implications of doing so should be factored into the decision making and appropriate protection measure requirements imposed (such as lifting floor-levels, raising land or other inundation or erosion protection measures).

Local government should also consider undertaking managed retreats of existing developments in areas vulnerable to flooding or rising sea levels in circumstances where either the avoidable risk of loss is calculated as being too high and/or it is uneconomic to protect them (with reference to the cost of future interruptions, emergency response costs, protection measures and potential property damage etc). Again, the future availability and affordability of insurance and lending should be considered in decision making here. Consideration should be given to adopting an adaptive pathway in this context, noting that under it, the specific process to retreat may vary. In some cases, this may involve less disruptive and expensive interim measures being put in place before a decision is ultimately made to retreat or move onto some other pathway, once more is known.

---

lenders and insurers) that the land is subject to a natural hazard and specifies what the natural hazard (or hazards) are. Failing to disclose this information may lead to a claim being declined.

<sup>61</sup> For example, the aforementioned IAG's climate poll 2020 records that 72% of respondents considered that local councils should zone land specifically to reduce the impacts of climate change, while 65% considered that local councils should only consent development that reduces or avoids the impact of climate change. See also Just how safe from the rising sea level are our beach houses? (12 July 2020), <https://www.stuff.co.nz/life-style/homed/latest/300050107/just-how-safe-from-the-rising-sea-level-are-our-beach-houses> and Climate change may soon render beach houses uninsurable (15 July 2020), <https://www.insurancebusinessmag.com/nz/news/breaking-news/climate-change-may-soon-render-beach-houses-uninsurable-227816.aspx>.



*Climate change should be prioritised in planning and investment decisions*

Climate change risks should be prioritised in local government's planning and investment decisions about infrastructure.<sup>62</sup> Specifically, local government should incorporate emissions reduction targets into investment decisions on transport, fleet procurement and waste management.

Planning and investment decisions should also have specific regard to managing or reducing natural disaster risk and protecting assets casting a broad net that includes both built infrastructure (such as stormwater drains, culverts, stock banks, seawalls and transport and waste management), natural infrastructure (such as dunes, wetlands, rain gardens, swales) and potential changes to land use, and with regard to potential:

- **direct costs**, such as the cost of remediating public infrastructure, privately owned assets, emergency response costs and damage to regional ecosystems, flora and fauna
- **broader economic, social and natural environment impacts**, such as business interruption, prevention of access and loss of supply chains, depopulation, displacement, entrenchment or the further opening up of inequalities, loss of habitats
- **downstream impacts**, such as contamination to potable water supply that in turn negatively impacts the ability to earn income, quality of life and public health, and
- **impacts to resiliency**, such as the impact of an essential road, public facility or utilities being cut off or out of operation for a number of months or years.

In considering these issues, a consistent and co-ordinated approach needs to be taken looking at the total pool of infrastructure assets in the region, potential climate change impacts and avoidable losses over the long-term. This will invariably involve liaising with central government, other public agencies and private utility companies (e.g. electricity, gas and telecommunications network operators and suppliers). Regard should be had to making decisions that maximize co-benefits.

In evaluating these matters local government should also consider adopting an adaptive pathways approach. Rather than committing to substantial investments upfront (which may be subsequently rendered obsolete or make further adjustments difficult or costly), focussing on short-term actions and long-term options that provide flexibility to make the right decision later once more is known.

*Ensuring buildings are resilient to climate change impacts*

In conjunction with the above, it is also important that any new building work approved (including design, construction and materials used) contributes to reducing emissions (in both its construction and operation),<sup>63</sup> and is more resilient to climate change impacts alongside other natural hazard risks (e.g. earthquakes) with a view to bolstering longevity and avoiding inefficient redundancy or obsolescence.<sup>64</sup>

Again, this is all about bypassing avoidable climate change risk. This approach also reflects that ensuring building resiliency at the outset is much more cost efficient than waiting until a climate change related event occurs and addressing it at that point. Consideration could also be given to

---

<sup>62</sup> This is reinforced by insights from the IAG's climate poll 2020 where 72% of respondents indicated that local councils should use funds to help build infrastructure that reduces the impact of climate change.

<sup>63</sup> To this end, the Government recently announced a Building for Climate change programme focussing on finding ways to reduce emissions from buildings during their construction and operation, while also preparing buildings to withstand changes in the climate, <https://www.building.govt.nz/about-building-performance/news-and-updates/all-news-and-updates/building-for-climate-change-programme-gets-underway/>.

<sup>64</sup> The Building Research Association of New Zealand (BRANZ) have some useful resources in this regard, <https://www.branz.co.nz/>



subsidising resiliency improvements for homes or managed retreat in low income areas with a high risk to climate change impacts, noting that climate change has the potential to exacerbate existing inequalities.<sup>65</sup>

If owners are rebuilding following a climate change related event, local government should encourage them to make changes to improve resiliency in their rebuild, rather than simply reinstating things as they were (as if nothing had happened). If these risks are not appropriately addressed, future avoidable property damage and interruption is likely inevitable. Failing to adequately address these issues is likely to impact insurance availability and affordability too.<sup>66</sup>

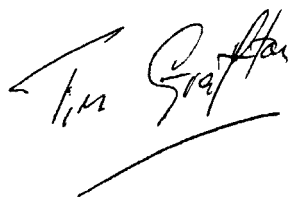
## Conclusion

Thank you again for the opportunity to submit on the Wellington City Council's public consultation on Planning for Growth. If you have any questions, please contact our Regulatory Affairs Manager, Nick Whalley on (04) 914 2224 or by emailing [nickw@icnz.co.nz](mailto:nickw@icnz.co.nz).

The issues posed by climate change are confronting. However, local governments are well placed in many respects to address these issues. Good progress can be made in this regard by acting proactively and in a consistent and co-ordinated manner, and by taking a long-term view that focusses on both climate change mitigation and adaptation.

It is truly positive that some local councils have already made great strides to engage with and progress climate change issues - some of this work is outlined in appendix 1. There are also some helpful resources local governments can leverage in this regard - as outlined in appendix 2.

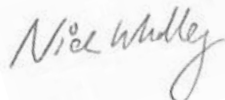
Yours sincerely,



**Tim Grafton**  
Chief Executive



**John Lucas**  
Insurance Manager



**Nick Whalley**  
Regulatory Affairs Manager

<sup>65</sup> National climate change risk assessment for New Zealand - Main report (2 August 2020), <https://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/national-climate-change-risk-assessment-main-report.pdf>

<sup>66</sup> In general terms insurers may be able to work their customers to factor in adjustments in the rebuild to better protect it from future losses in the future as doing so is to their mutual benefit. However, the particular claim response will depend on the specific insurance policy in force and circumstances, sum insured and betterment limitations may apply and generally insurers do not contribute to additional costs to comply with changes required by the Government or a local authority unless the relevant building complied with all relevant legislation and regulations at the time it was built or altered.

**APPENDIX 1:  
EXAMPLES OF LOCAL GOVERNMENT PROGRESS ON CLIMATE CHANGE**

- Whangarei District Council’s draft Natural Hazard Plan Change for their District Plan (which includes a review of flooding and coastal hazards). More information is available [here](#).
- Waikato District Council’s Stage 2 of the Waikato District Plan Review (which focusses on Natural hazards and the effects of climate change). More information on this available [here](#). *Waikato Regional Council also recently secured \$23.8 million from the Government for 10 flood protection and catchment projects (4 August 2020). More information on this is available [here](#).*
- The Bay of Plenty’s Rangitāiki River Scheme Review – April 2017 Flood Event (18 September 2017). More information on this is available [here](#).
- Whakatane District Council’s Awatarariki Managed Retreat Programme. More information of this is available [here](#).
- The Hawkes Bay’s Coastal Hazard Committee’s<sup>67</sup> Clifton to Tangoio Coastal Hazard Management Strategy 2120 (August 2016). More information of this is available [here](#).
- Tasman District Council’s community centric coastal management work. More information on this is available [here](#).
- Christchurch City Council’s flood intervention policy (including investigation and mitigation of the Flockton area). More information on this is available [here](#).
- Queenstown Lakes District Council’s flood management work (including a joint flood mitigation strategy). More information on this is available [here](#).

---

<sup>67</sup> This is a joint committee, bringing together elected representatives from Hastings District Council, Napier City Council and Hawke’s Bay Regional Council.

**APPENDIX 2:  
HELPFUL RESOURCES FOR LOCAL GOVERNMENT ON CLIMATE CHANGE**

| Author   | Title and hyperlinks for access   | Date           |
|--|---|----------------|
| Ministry for the Environment   | Coastal Hazards and Climate Change: A Guidance Manual for Local Government in New Zealand available <a href="#">here</a>  | July 2008      |
| Department of Conservation   | New Zealand Coastal Policy Statement 2010 available <a href="#">here</a>  | 2010           |
| Judy Lawrence, Frances Sullivan, Alison Lash, Gavin Ide, Chris Cameron & Lisa McGlinchey | Adapting to changing climate risk by local government in New Zealand: institutional practice barriers and enablers available <a href="#">here</a>   | 2015           |
| Parliamentary Commissioner for the Environment   | Preparing New Zealand for rising seas: Certainty and Uncertainty available <a href="#">here</a>   | November 2015  |
| Tonkin+Taylor  | Risk based approach to natural hazards under the RMA available <a href="#">here</a>   | September 2016 |
| Climate Change Adaptation Technical Working Group  | Adapting to Climate Change in New Zealand available <a href="#">here</a>  | 31 May 2017    |
| Ministry for the Environment   | Preparing for coastal change: A summary of coastal hazards and climate change guidance for local government available <a href="#">here</a> .  | December 2017  |
| Jack Hodder QC   | Climate Change Adaptation: session of the Local Government New Zealand Rural and Provincial Sector Meeting, Wellington available <a href="#">here</a>   | 7 March 2019   |
| Oxfam NZ   | How to Talk About Climate Change: A Toolkit for Encouraging Collective Action available <a href="#">here</a>  | 31 July 2019   |
| Deep South Challenge: Changing our climate   | Supporting decision making through adaptive tools in a changing climate: Practice guidance on signals and triggers available <a href="#">here</a>   | 2020           |
| Local Government New Zealand   | Various resources for local governments on climate change available on their Climate Change Project page <a href="#">here</a> and case studies regarding community engagement on climate change adaptation <a href="#">here</a>                                     | Various        |
| Ministry for the Environment   | Climate change adaptation and local government available <a href="#">here</a>   |                |
| Massey University  | Sample risk management framework produced by available <a href="#">here</a> .<br><br><i>Also see, by way of example, the Risk Management Framework, Policy and Guidelines put together by the Thames Coromandel District Council available <a href="#">here</a></i> |                |

APPENDIX 3:

ICNZ’s view of the role of local government on climate change

What (the problem: climate change is here)

|  |   |  |  |
|--|---|--|--|
| Larger and more extreme weather events | Sea levels rising, coastal erosion and flooding | Droughts, water shortages and wildfire | <b>Flow on impacts to:</b><br>- Natural and built environments<br>- human, economic and governance |
|--|---|--|--|

*The potential impacts stretch across generations, with the economic, social and environmental impacts being too significant to ignore and only increasing if no action is taken*

Why (local government need to act)

|   |   |   |   |
|---|---|---|---|
| The best responses are context specific (addressing matters at a local level) | Ensuring resources are efficiently used | Communities are increasingly demanding action | Ensuring insurance and therefore lending remains available and affordable |
| There is a legal duty to do so  | Bypassing avoidable harm                |   |   |

How (local government can act)

|   |  |  |   |
|---|--|--|---|
| Grapple with the full impacts of climate change (taking your community on the journey, leveraging the best available science and regional capability) | Thorough planned action and investments for adaptation and mitigation (reducing the extent of future climate change and its impacts) | Take a holistic, long term and flexible approach (using a risk management framework to prioritise and an adaptive pathways approach) | <b>Practical actions includes:</b><br><ul style="list-style-type: none"> <li>✓ collaboration and co-ordination</li> <li>✓ building and sharing knowledge</li> <li>✓ embedding mitigation and adaptation in investment and planning decisions</li> <li>✓ declining development in areas vulnerable to flooding or rising sea levels</li> <li>✓ ensuring buildings are resilient</li> </ul> |
|---|--|--|---|

*A pro-active, co-ordinated, and long-term view should be taken to managing the real and significant impacts of climate change, putting people, businesses and communities at the heart of decision-making*

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## A City for the People submission ID 03

This submission was originally received through the A City for the People website:

<https://www.cityforpeople.org.nz/take-action>

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Name:** Patrick Morgan

### I support the following statements:

I strongly agree with proposals to intensify the Central City, Inner Suburbs and Outer Suburbs to allow for compact, livable, low-carbon urban form.

I support council taking action to ensure everyone in Wellington can live in safe, warm, affordable housing that provide for a diverse range of housing needs.

I support reducing the size of the character areas to focus on well-preserved sections while allowing homes in poor condition to be redeveloped.

I believe that natural heritage and the heritage of mana whenua are important and should be celebrated, protected and enhanced.

I support focusing development along future mass rapid transit routes and agree that strong amenity value must be developed alongside.

I support the establishment of safe and easy to use active transport routes alongside areas of development.

I support the council developing a plan to make sure everyone will have access to high quality green space and public space.

I support requiring new developments to manage stormwater through water-sensitive design.

The council should pause plans to develop unsustainable communities in green-field sites in Upper Stebbings Valley & Lincolnshire Farm and instead focus on enabling density closer to the city

I believe the council needs to make sure streets and buildings are designed with disabled people in mind.

I strongly agree with taking a city-wide approach to distributing density

**What excites you most about having a more compact and liveable Wellington?**

More affordable and healthy housing for people . Density enables quality PT and low carbon transport such as walking and cycling. Without affordable housing, we enable expensive and high-carbon sprawl.

# **Our City Tomorrow: A Draft Spatial Plan for Wellington City**

[REDACTED]

---

**From:** Patrick Morgan [REDACTED]  
**Sent:** 07 October 2020 17:37  
**To:** BUS: Planning For Growth  
**Subject:** Newtown Residents Association submission on spatial plan

**Categories:** Red Category, Blue Category

Hello,  
I'm a member of Newtown Residents Association.  
The submission made by NRA does not represent my views.  
regards

--  
*Patrick Morgan*



# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## Online submission form ID 16309

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Organisation Name:** NZ Centre for Sustainable Cities

### 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?**

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?**

Agree

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

See submission

**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?**

Neutral

**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 submission

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

Access to public transport, 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),

Social services and communi

**Other:**

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

Public shared spaces, Shops and businesses, New housing, Community facilities (libraries, community spaces, social services, etc.), Child care

**Other:** See submission

**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?**

Essential businesses

Access to public transport when levels permitted

Green / blue / open spaces

See submission

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

Essential businesses and services

See submission

**Non-Compulsory Questions**

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

See submission

**2. What would you change or improve?**

See submission

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

See submission

**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.**

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.**

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.**

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.**

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.**

**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?

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?

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 submission

Have you provided an attachment? Yes



5 October 2020

To: Wellington City Council

*As attached to on-line submission*

## **Submission by the NZ Centre for Sustainable Cities on Our City Tomorrow: Wellington's Draft Spatial Plan**

Paul Blaschke<sup>1</sup>, Ralph Chapman<sup>2</sup>, Ben Schrader<sup>3</sup>, Caroline Shaw<sup>4</sup>, Ed Randal<sup>4</sup>, Philippa Howden-Chapman<sup>5</sup>, Ian Shearer<sup>6</sup>, for the New Zealand Centre for Sustainable Cities

### Summary of Main Points

- We agree in general with the proposed Wellington Draft Spatial Plan (DSP), and underline the importance of measures proposed to **intensify** the city, enabling people to live well while rapidly reducing levels of carbon emissions, from transport in particular. **Alignment with Te Atakura (First to Zero) is critical.** Urban form and design should support sustainable travel modes – namely public transport, active travel (walking, cycling, scooting, etc.) and zero-carbon modes such as electric car sharing.
- As intensification takes place in appropriate parts of the city, it will be necessary to ensure **“densification done well”**, especially retaining and protecting high quality **heritage and character** buildings and housing, and adequate green **and public space**. We see ‘transitioning’ the city over coming decades towards greater intensity as a planned process of enabling replacement and upgrade of the building and housing stock along the main arterials and at key transport and activity nodes. The council will need to take responsibility for acquiring and upgrading green and public space, especially where intensification is occurring, financed largely through adequate development contributions and, we suggest, use of levies on value uplift.
- **Housing affordability** is an important goal as development proceeds in Wellington. We envisage Wellington retaining its attractiveness as a place to live and work, and - although there is considerable uncertainty about this -- believe we have to plan for

<sup>1</sup> Blaschke and Rutherford Consultants, and NZ Centre for Sustainable Cities

<sup>2</sup> Assoc Professor, SGEES, Victoria University of Wellington, and NZ Centre for Sustainable Cities.

<sup>3</sup> Independent historian, and NZ Centre for Sustainable Cities

<sup>4</sup> University of Otago, Dept of Public Health, and NZ Centre for Sustainable Cities

<sup>5</sup> Professor, University of Otago, Dept of Public Health, and NZ Centre for Sustainable Cities

<sup>6</sup> Front-End Solar Technologies Ltd, Wellington, and NZ Centre for Sustainable Cities

the possibility of population growth at the middle to upper end of the range set out in WCC's planning documents<sup>7</sup>.

- We believe the plan should be relatively **permissive**, allowing varied, creative building and housing designs **within the constraints** of meeting the above goals. For example, we do **not** support a requirement for new buildings to be 'at least six storeys' in the central city, and we believe this is not a statutory requirement of the NPS-UD.

### About the New Zealand Centre for Sustainable Cities

The New Zealand Centre for Sustainable Cities is an interdisciplinary research centre dedicated to providing the research base for innovative solutions to the economic, social, environmental and cultural challenges facing our urban centres. We undertake a range of research, published as books (Early et al. 2015; Howden-Chapman et al., 2017), journal articles, policy papers, working papers, and blogs, as well as making submissions from time to time to central government and councils on a range of issues relevant to cities, from climate change policy to compact urban development. See <http://sustainablecities.org.nz/> and <http://resilienturbanfutures.org.nz/><sup>8</sup>

### High level principles relevant to the Draft Wellington Spatial Plan

- Underlining consistency with the zero carbon goal
- Retaining the compact, walkable city vision
- Support for intensification done well and improving housing affordability
- Protecting heritage, character and green space
- Alignment with other relevant local, regional and national policies and programmes

These principles are examined in turn with discussion and examples. The last principle of alignment with other relevant policies and programmes is mentioned throughout other sections.

### Consistency with zero carbon emissions goal

A 'sustainable' or 'zero carbon' city is in our view the single most important additional feature of the city we would like to see included in the vision informing the WDSP. The current vision ('ensuring a green, vibrant and prosperous, inclusive and connected, compact and resilient Wellington city') does not explicitly include this, and could be amended either to include the word 'sustainable' or include the words 'zero carbon [city]'. However, as we assume it may not be possible to amend the five goals at this stage, we believe it is vital to

---

<sup>7</sup> We are aware of the latest update (25 September) to the population projections. Covid-19 effects on migration and CBD/suburban/home working patterns adds significant uncertainties to all demographic projections, especially intro-urban ones.

<sup>8</sup> *Disclosure:* most writers of this submission are resident in Wellington City and many have specific personal views especially relating to their own suburb (some having written personal submissions), but this submission is the consensus of all writers on behalf of the NZ Centre for Sustainable Cities.

explicitly state that the Spatial Plan will be fully consistent with the Council's Te Atakura (First to Zero) strategy.

We believe the WDSP plan broadly can be consistent with a vision of Wellington city moving progressively to net zero carbon emissions by 2050, via 50% (approximately) % reductions within a decade (2030), in line with the strong recommendations of the IPCC, and consistent with WCC's Te Atakura strategy.<sup>9</sup>

The importance of placing emissions reduction at the centre of WDSP thinking rests on both ethical and political arguments. The reality as we see it is that if Wellington and New Zealand in general do not adhere to the IPCC's recommended trajectory, then New Zealand will neither have the ethical nor the practical political leverage to influence other regions and countries to reduce emissions rapidly enough to avoid disastrous climate change. If the international community were to continue on its current trajectory, there is a high likelihood of catastrophic warming and other manifestations of climate change within coming decades, with potentially more than a billion lives lost and/or forced to migration migrate by 2070 (Xu, Kohler, Lenton, Svenning, & Scheffer, 2020). Such a world would be beset by conflict and devastating for future generations. Wellington must do everything possible to avoid this scenario, by demonstrating that it is possible to reduce emissions to zero by 2050.

#### Urban density and transport

The proposals contained in the Draft Plan are a necessary component to achieving a healthy low carbon transport system. Urban density, along with mixed land use, is one of the most powerful determinants of sustainable urban access and mobility, and economic productivity. Increasing population density, mixed land use and transport connections reduce emissions, improve health and increase liveability (Ewing & Hamidi, 2015; Stevenson et al., 2016). To achieve the transport emission reductions necessary to deliver on Te Atakura, as well as the 2020 NPS on urban development, Wellington must increase urban density. We suggest that the proposed changes around density should be clearly framed and explained more explicitly in terms of carbon emission mitigation. Council could even provide some indicative estimates around the reduction in emissions that will be achieved by the increase in density planned, to strengthen the case for change.

Failure to achieve an increase in density would result in a narrower suite of options available to reduce emissions in the transport sector. A denser city will allow transport emission reductions through increased use of public transport, cycling (electric and regular) and walking as well as fleet conversion to electric cars. A less dense city would require emission reductions to be almost exclusively delivered through fleet conversion to electric cars. This latter option would result in an exacerbation of congestion, community severance, poor health, high infrastructure costs, inequity and low liveability. This is because evidence is now showing that due to the low cost of running, owners of electric cars increase their trips numbers and drive longer distances, in some cases quite substantially (Daramy-Williams,

Anable, & Grant-Muller, 2019; Haustein & Jensen, 2018; Kester, 2018). Moreover, some of the policies required to promote fleet conversion to electric cars (such as free parking and charging points) unsurprisingly encourage extra use of the vehicles once purchased. These drivers of induced private vehicle travel would result in Councils requiring to put substantial travel demand management policies in place (e.g, congestion charging, parking restrictions etc) to deal with the extra trips and longer distance travelled.

It is essential that rapid-transit routes are chosen and promulgated, including timetables, *before* residential intensification developments are allowed.

### Promoting urban density achieves multiple goals -- including keeping open a wider range of options to deliver transport carbon emission reductions

Reducing carbon emissions means not only transport emissions but progress to reduce emissions associated with the construction, demolition and (future) operation of buildings. This is relevant to the spatial plan, although other action is also needed to deliver it. There needs to be careful analysis by the Council, working with MBIE (MBIE, 2020), of ways in which the city can ensure that only zero- or very low-emissions buildings are constructed. Moreover, avoiding construction emissions is consistent with heritage and character buildings and housing being preserved. This does not of course mean preserving *all* buildings, especially where single storey buildings stand in the way of multi-storey buildings that would provide much needed housing intensification (see below).

Another aspect of climate change needs to be taken into account in the DSP: it will be necessary to design for resilience in the face of climate change, as the Council has accepted. All buildings in low-lying areas such as within a few blocks of the harbour will need to be designed to cope with sea level rise of at least a metre, and conservatively, two metres, with corresponding foundation work and storm water arrangements.<sup>10</sup>

### Retaining the compact, walkable city vision

Wellington city's compact character is what makes it the most walkable and lively inner city in New Zealand. It must be retained. We believe this is compatible with the approximately 8000 additional dwellings expected in the central city, but this extra provision needs to be 'done well' and not distributed randomly and with little attention to sensitive areas, such as close to the harbour.

In addition, given the desirability of a diversity of heritage and character buildings in parts of the central city, we believe it would be a mistake to require all buildings to be 6 storeys or more in this area. This does not appear to be required under the National Policy State-Urban Development (NPS-UD). Policy 3 of the NPS-UD requires that local government policies and plans **must not prevent** buildings of at least 6 storeys being built. But it is clearly a discretionary policy in terms of **minimum** height limits. Furthermore Policy 3 as written more easily enables an integrated approach to Outcome 1 of the NPS-UD: "New Zealand has well-functioning urban environments that enable all people and communities to provide for

---

<sup>10</sup> In the longer term, i.e. beyond 2100, this area could well be exposed to several metres of sea level rise.



their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.”

In many cases, new buildings of three to five storeys could be permitted in some places without compromising intensification goals, although market pressures will of course tend to push developers to greater height levels. Moreover, we do not see it as desirable to increase maximum building heights to above 10 storeys in the blocks in the close vicinity of the harbour. This could create the effect of an extended wall of tall buildings close to the harbour, cutting off views from many areas and buildings further back, and reducing the amenity at the harbour edge. There is already scope within the central city for considerable intensification, without going above 10 storeys.

### Support for ‘Densification Done Well’

As outlined above, intensification (densification) is vital for two main reasons – to ensure housing affordability, and to enable transport and home-heating emissions to be reduced (Lee & Lee, 2020; Norman, MacLean, & Kennedy, 2006). For these reasons, we are highly supportive of the general thrust of the intensification goal.

However, in some inner suburban areas, such as Newtown, we believe the Council’s draft plan may be too sweeping and too blunt. We are in agreement with the Council on the following aims:

- Removal of the requirement for on-site car parking
- Concentrating future development around existing bus routes and the future mass rapid transit route and town centres, provided this is staged over the full period of *Planning for Growth*<sup>11</sup> so that initial development is concentrated on smaller narrower zones.
- Increased height limits to allow development of at least six storeys along key transport routes to support growth in areas linked to the Let’s Get Wellington Moving programme.’ (WCC 2020, Our City Tomorrow)

However, this does not justify more widespread and unselective intensification across all areas mentioned. Going up to six storeys or more may be too much, and unnecessary to cater for planned growth and densification goals, in parts of some inner and outer suburbs.

If areas within walking distance of the central city are to be intensified (as they should be), then there should be a greater degree of consistency in provisions for this. The WDPS requires intensification in some areas, including some outer suburban areas, while requiring lower height limits in areas within easy walking distance of the CBD (eg Mt Victoria and Kelburn. Kelburn is insufficiently justified as an outer suburb and appears to be particularly ‘under-utilised’, with only a tiny pocket of up to 6-storey zoning, and a 4-storey maximum in streets less than a kilometre from Lambton Quay, despite no identified need for character

---

<sup>11</sup> We understand that even after its current revision, the District Plan will be revised again during the 2025-45 period during which the WDSP.

protections. (In contrast, Johnsonville, has streets with “at least 6 stories” enabled well over a kilometre from its railway station). Central Hataitai also appears to be under-densified, given its easy proximity to the Golden Mile and its possible location on planned future transit routes (a second tunnel, for example).

To take Newtown as an example, we note that WCC [now project](#) between 500 and 750 more dwellings required in Newtown<sup>12</sup>, so the pressure to go up may not be quite as intense as the 2000 homes figure earlier indicated. Realistically, there does seem to be a move towards urban centre living, and a likely immigration demand over the next 30 years, especially as climate change-driven migration ramps up. But taking these various factors together, a rapid and blunt intensification in such inner suburban areas may not be necessary. There seems to be adequate scope for densification largely **around arterials and nodes** and within close proximity of these arterials and nodes (initially one lot or one block wide). ‘Pepper potting’ a considerable number of high density (type 4b) apartments elsewhere in these suburbs may not only tend to damage suburban character, and cause widespread loss of sun, it may be unnecessary.

A further critical general point with regard to all aspects of “Densification Done Well” is the very high dependence of the WDSP on **design and other guidelines** to guide the implementation and assessment of all developments to high standards. This will be necessary to ensure the political durability of the final Spatial Plan as well as the outcomes required for expression of the high-level principles. These guidelines as well as other aspects of the WDSP will also help to ensure the necessary integration of the WDSP with other WCC and regional planning documents, e.g. Wellington Growth Strategy, Let’s Get Wellington Moving, Liveable Streets, Green Network Plan.

### Housing affordability

Housing affordability is a very important issue, but there are limited tools available to local government to improve affordability through the spatial plan. Essentially, leaving aside subsidies, which are better left to central government, we see two major tools available to the Council to address affordability through the Spatial Plan – improving the supply of housing, and inclusionary zoning. Neither aspect should come at the cost of high quality of design and other guidelines mentioned above.

Increased supply is likely to follow from intensification, but it may take some years for effects to be felt in prices, and this will depend on whether supply growth is outstripped by growth in demand. Demand shifts are outside the control of district councils. Moreover, reducing excess demand by increasing supply will work only if supply is provided in the lower-middle part of the market, where affordability is most severe (leaving aside the public housing part of the market).

<sup>12</sup> [https://planningforgrowth.wellington.govt.nz/\\_data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

This is where inclusionary zoning can play a role, and is widely used in overseas jurisdictions (e.g. de Kam et al, 2014)<sup>13</sup>. We would support its use but it might drive away some developers who may prefer to operate in a market without any constraint such as having to provide 10% affordable units within their developments. The Council would need to be prepared to argue that its value in addressing affordability by providing more housing for lower income buyers is worth a degree of negativity created by the regulation involved. An important argument here is that without inclusionary zoning, lower income households are often driven out of the central city or inner suburbs, and this makes it more difficult for workers to access jobs in the (inner) city, impeding to some degree the labour market, lowering productivity, and reducing social integration. Such effects have been seen in parts of New Zealand such as Queenstown in recent years.

We conclude that inclusionary zoning warrants further discussion, but in the meantime increased housing supply via greater intensification will make a significant contribution to housing affordability.

### Heritage Protection

The NZCSC supports the erection of new medium density housing and particularly affordable housing in the inner city and suburbs, but this should not be at the unnecessary expense of heritage and older housing that could be readily preserved with careful management and good urban design practices.

We believe that retaining older buildings is essential to making urban environments more sustainable. International research has identified that nearly 40 percent of all greenhouse gases are produced in the construction, demolition and operations of buildings. Most new buildings erected in the present are built for a 50-year lifespan, meaning they will not survive long enough to repay the amount they cost in carbon to construct (Page, 2016; Hartenberger, 2011).

Conversely, preserving older buildings contributes to climate change solutions by storing energy (often called embodied energy) and becoming carbon reservoirs.<sup>14</sup> Demolishing buildings intensifies landfill pressures and increases demand for finite raw materials to create new building products. As the American architect and sustainability expert Carl Elefante famously put it: 'We cannot build our way to sustainability; we must conserve our way to it.'<sup>15</sup>

CSC acknowledges that retaining every building in the existing character areas is not practicable if intensification is to occur in sustainable ways and that there is a difficult balancing act between preserving heritage and providing affordable, fit-for-purpose housing

---

<sup>13</sup> We note that the Netherlands is also now encountering greater affordability issues, see [https://www.pbl.nl/sites/default/files/downloads/PBL2018\\_Policy-and-practice-affordable-housing-in-the-Netherlands\\_3336\\_0.pdf](https://www.pbl.nl/sites/default/files/downloads/PBL2018_Policy-and-practice-affordable-housing-in-the-Netherlands_3336_0.pdf)

<sup>14</sup> Erica Avrami, 'Making Historic Preservation Sustainable', *Journal of the American Planning Association*, 82:2, (2016) p, 105; Richard Wagner, 'Finding a Seat at the Table: Preservation and Sustainability', in Richard Longstreth, ed, *Sustainability and Historic Preservation: Towards a Holistic View*, Newark: University of Delaware, 2011, pp. 10-11.

<sup>15</sup> Carl Elefante, 'The Greenest Building is ...One that is Already Built', *Forum Journal*, 21:4,(2007) p. 26

close to the city to reduce transport carbon emissions. We also want to ensure that every effort is made to avoid unnecessary demolition or wasting of building resources. The sub-character areas identified in the DSP should therefore be extended to realise both aims.

We believe the best way forward is for future growth to be carefully managed and staged. Intensification should begin in semi-industrial brownfield sites along existing and forecast public transport spines and then move back from there. This would ensure that the impact of redevelopment on the existing character areas is better controlled and less invasive than if unrestricted growth was permitted from the start.

CSC recognises that building “sustainable communities” is broader than preventing flooding and putting up green buildings. It also has a social imperative. Built heritage contributes to sustainability by identifying the places that matter to all of us. It is not confined to Victorian suburban heritage as has been claimed. The myriad stories people have told about these places – from the earliest arrivals to mana whenua to colonial settlers and later immigrants, – help root us all in our communities and contribute to our social identities.<sup>16</sup> They nourish and sustain us.

We are not aware of a comparable city with Wellington that has deregulated height limits to allow the high level of intensification in character and heritage areas that is proposed in the DSP. Rather than opening intensification to large swathes of historic areas, the usual response is to restrict rebuilding to certain zones, whether this be along arterial transport routes or in places of lower heritage value. For example, Melbourne’s old inner-city suburbs have faced similar pressure for intensification that Wellington has faced. In an attempt to increase density Melbourne City Council too revised its spatial plan in the mid-2010s to encourage growth while also maintaining good heritage protections.<sup>17</sup> The carefully managed spatial plan for suburban Carlton allows for multi-storey housing of up to eight stories in particular areas (Residential Growth Zone) while maintaining heritage protections for much of the rest of the suburb (General Residential Zone). This approach has enabled the area to accommodate hundreds of new dwellings without sacrificing the heritage attributes that have long defined the suburb. Wellington could learn much from this approach.<sup>18</sup>

---

<sup>16</sup> Page, *Preservation*, p 127.

<sup>17</sup> City of Melbourne, *New Residential Zones: Analysis and Implementation Report*, Issue 1, Melbourne, (2014), pp. 1-14 and 16-21. [https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.com-participate.files/2314/1290/8087/Background Methodology and Recommendations .PDF](https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.com-participate.files/2314/1290/8087/Background_Methodology_and_Recommendations_.PDF) and [https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.com-participate.files/2314/1290/8087/Background Methodology and Recommendations .PDF](https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.com-participate.files/2314/1290/8087/Background_Methodology_and_Recommendations_.PDF) (accessed 5 Oct 2020).

<sup>18</sup> This link explains Melbourne’s heritage overlay mechanism, similar to Wellington’s existing character areas: <https://www.yarracity.vic.gov.au/the-area/heritage/heritage-overlays-and-gradings>. These links show the type of housing being built in Carlton’s Residential Growth Zones: <https://citta.com.au/portfolio/elgin-street-carlton/> and [http://jacksonarchitecture.com.au/portfolio\\_page/living-carlton-housing-redevelopment/](http://jacksonarchitecture.com.au/portfolio_page/living-carlton-housing-redevelopment/) (accessed 5 Oct 2020).

### Green, blue and open spaces

Our work on green space in the city suggests a strong need to increase provision of smaller parks, green paths, and street trees to balance the intensification occurring in the central city, especially in the Te Aro census area unit.

There are important benefits of green and blue spaces for health and wellbeing and for amenity of residents, commuters and visitors (Blaschke et al 2019, Bertram et al, 2020). There is also emerging evidence, including from Wellington, for positive effect of access to nature on the pro-environmental behaviour of residents (Whitburn et al. 2019, 2020).

Wellington City is relatively well-endowed with green and blue spaces, especially its town belt network (Inner Town Belt and Outer Green Belt), some iconic botanical gardens and large reserves and its superb harbour and South Coast. Close access to green and blue space is needed for these benefits. This close access can't be assumed for Wellington residents, especially the very young, the elderly and people with disabilities.

Our recent detailed study of GS distribution and accessibility in the central city (Blaschke et al., 2019) shows marked differences, and poor availability and equitability in places especially in Te Aro, exactly the part of the city where most current growth is concentrated. These differences are likely to be exacerbated by projected population growth in the next 25 years.

It will therefore be necessary to actively plan and implement additional areas of green space in those parts of the central city and inner suburbs where densification is planned, otherwise the liveability of Wellington will be under threat.

This is not an argument against densification or an increase in building heights. It is an argument for:

- incorporation of green space in various forms (pocket parks, street trees and street strips, other road reserve areas, green walls
- greater space between tall buildings, and attention to site coverage rules that mandate and incentivise these spaces.
- attention to quality, so that every area of green space counts. This is not only for health and wellbeing and amenity but for other important ecosystem services and also resilience. For example the WDSP discusses the need for 'anchor sites' but it is clear from the population growth data for the central city that additional anchor sites are required for the Te Aro area to provide resilience in the case of earthquakes or other natural disasters.

We have some limited data that suggests that access in outer suburbs is equally inequitable (Chan, 2017). These data and our knowledge of Wellington suggests that a more nuanced approach to the outer suburbs is justified. There are big differences in the appropriate settings for intensification between Tawa, Newlands, Brooklyn, Mirimar (and various outer suburbs of Seatoun, Breaker Bay, Owhiro Bay, Crofton Downs etc) which don't even make it into the analysis, also subject to development pressure.

There is also an important need for public transport access to all significant green and blue spaces. Green space in turn often offers transport opportunities especially for active transport.

Most of our knowledge is of public green spaces. We need far more integration between public and private green space (some will be provided by the Backyard Taonga project within District Plan work). Private spaces integrate importantly with public green spaces – in terms of visibility from the street, many ecosystem services which cross the public/private boundary, and of course the health and wellbeing of residents. Green space therefore needs to be built into new private and social housing initiatives.

Within the public green space realm there are many places which are not WCC Parks and Reserves and nevertheless have important values (Blaschke et al, 2019), including school grounds, government building grounds, and transit corridors. Road reserves are also vital in suburban areas. Need better integration of all green space tenures.

#### Other infrastructure requirements

The context of the WDSP is within a degraded and insufficient infrastructure – water, waste management, poor resilience to flooding, earthquakes etc. Intensification needs to build better, including infrastructure, not just more.

We see this directly with housing. All new housing needs to include higher building performance and greater energy efficiency, regardless of density or positioning within the sector or market.

Stormwater control facilities must be encouraged or if necessary required to cope with an increased likelihood of short bursts of very heavy rainfall. This also requires selected streets in the hilly Wellington environment to be designed as ‘flood-channels’ on specific routes to the sea or to specific spaces which can act as local holding basins, plus swales incorporated on residential streets all buildings sited to avoid storm water deluge inflow. Similarly, rainwater storage tanks for non-potable water usage should be associated with all new residential densification developments.

Encourage integration and sharing of local generation from solar energy resources via residential embedded-networks and micro-grids to increase local resiliency zones and limit the need for large scale electricity network upgrades.



## References

- Bertram, Christine, Jan Goebel, Christian Krekel, and Katrin Rehdanz. *Urban land use fragmentation and human wellbeing*. No. 2147. Kiel Working Paper, 2020.
- Blaschke, P., Chapman, R., Gyde, E., Howden-Chapman, P., Ombler, J., Pedersen Zari, M., . . . Randal, E. (2019). *Green Space in Wellington's Central City: Current provision, and design for future wellbeing. Report for Wellington City Council*. Retrieved from Wellington: <http://sustainablecities.org.nz/2019/12/report-green-space-in-wellingtons-central-city/>
- Chan F 2017. Distribution of green space in four Wellington City neighbourhoods. Unpublished NZCSC studentship report.
- Daramy-Williams, E., Anable, J., & Grant-Muller, S. (2019). A systematic review of the evidence on plug-in electric vehicle user experience. *Transportation Research Part D: Transport and Environment*, 71, 22-36.
- de Kam, G., Needham, B., & Buitelaar, E. (2014). The embeddedness of inclusionary housing in planning and housing systems: insights from an international comparison. *Journal of Housing and the Built Environment*, 29, , 389–402(2014). Retrieved from <https://link.springer.com/article/10.1007/s10901-013-9354-5>
- Early, L., Russell, M. & Howden-Chapman, P. *Drivers of Urban Change*. Wellington, Steele Roberts Aotearoa, 2015.
- Ewing, R., & Hamidi, S. (2015). Compactness versus sprawl: A review of recent evidence from the United States. *Journal of Planning Literature*, 30(4), 413-432.
- Hartenberger, U. (2011) 'Why Buildings Matter', *The Guardian*, 1 Jul 2011, <https://www.theguardian.com/sustainable-business/sustainable-building>
- Haustein, S., & Jensen, A. F. (2018). Factors of electric vehicle adoption: A comparison of conventional and electric car users based on an extended theory of planned behavior. *International Journal of Sustainable Transportation*, 12(7), 484-496.
- Howden-Chapman, P., Ombler, J., Early, L. *Cities in New Zealand: Preferences, patterns and possibilities*. Wellington, Steele Roberts Aotearoa, 2017.
- Kester, J. (2018). Governing electric vehicles: mobilizing electricity to secure automobility. *Mobilities*, 13(2), 200-215.
- Lee, S., & Lee, B. (2020). Comparing the impacts of local land use and urban spatial structure on household VMT and GHG emissions. *Journal of Transport Geography*, 84, 102694. Retrieved from <https://www.sciencedirect.com/science/article/abs/pii/S0966692319304971>
- MBIE. (2020). *Building for Climate Change: Transforming the Building and Construction Sector to reduce emissions and improve climate resilience*. Retrieved from Wellington: <https://www.mbie.govt.nz/dmsdocument/11522-building-for-climate-change>
- Norman, J., MacLean, H. L., & Kennedy, C. A. (2006). Comparing high and low residential density: Life-cycle analysis of energy use and greenhouse gas emissions. *Journal of Urban Planning and Development*, 132, 10.
- Max Page, *Why Preservation Matters*, New Haven: Yale University Press, (2016), pp. 108-10.
- Stevenson, M., Thompson, J., de Sá, T. H., Ewing, R., Mohan, D., McClure, R., . . . Sun, X. (2016). Land use, transport, and population health: estimating the health benefits of compact cities. *The Lancet*, 388(10062), 2925-2935.
- Whitburn, Julie, Wayne L. Linklater, and Taciano L. Milfont. "Exposure to urban nature and tree planting are related to pro-environmental behavior via connection to nature, the use of nature for psychological restoration, and environmental attitudes." *Environment and Behavior* 51, no. 7 (2019): 787-810.
- Whitburn, Julie, Wayne Linklater, and Wokje Abrahamse. "Meta-analysis of human connection to nature and proenvironmental behavior." *Conservation Biology* 34, no. 1 (2020): 180-193.
- Xu, C., Kohler, T. A., Lenton, T. M., Svenning, J.-C., & Scheffer, M. (2020). Future of the human climate niche. *Proceedings of the National Academy of Sciences*, 201910114. doi:10.1073/pnas.1910114117

# 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](mailto:planningforgrowth@wcc.govt.nz)

You can also answer these questions online at:  
[planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/consultation-form](http://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](http://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](mailto: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](http://planningforgrowth.wellington.govt.nz) > Draft Spatial Plan > View Draft Spatial Plan

**Mobile and accessible version** [planningforgrowth.wellington.govt.nz](http://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](http://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)*:  | PEGGY KLIMENKO   |                                |  |                                       |
| Your email*:  | [REDACTED]   |                                |  |                                       |
| Postal address*:  | [REDACTED]   |                                |  |                                       |
| Suburb:   | KHANDALLAH   |                                |  |                                       |
| Phone number:   |  |                                |  |                                       |
| Age range:  | <input type="checkbox"/> Under 18  | <input type="checkbox"/> 25-34 | <input type="checkbox"/> 45-54                                     | <input type="checkbox"/> 65-74        |
|   | <input type="checkbox"/> 18-24   | <input type="checkbox"/> 35-44 | <input type="checkbox"/> 55-64                                     | <input type="checkbox"/> 75 and older |
| Household:  | <input type="checkbox"/> Couple without children                               |                                | <input type="checkbox"/> Household of unrelated persons (flatting) |                                       |
|   | <input type="checkbox"/> Household with children living at home                |                                | Other (please specify) _____                                       |                                       |
|   | <input type="checkbox"/> Household with children who are no longer living home |                                |  |                                       |
| 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 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 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 type="checkbox"/> | <input type="checkbox"/>  | <input checked="" 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?*  | population growth numbers overstated. Census projections much lower. In current environment, where will extra people come from? |                          |                          |   |   |                          |
| 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 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) |   |                          |                          |   |   |                          |
| 7. What amenities would you want to help create a vibrant suburban centre?*   | Please pick your top 5 from the options below.  |                          |                          |   |   |                          |
| <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 checked="" type="checkbox"/> Public/shared spaces  |   |                          |                          | <input checked="" 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 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)   | <ul style="list-style-type: none"> <li>• privacy</li> <li>• landscape</li> <li>• access to sunlight on properties</li> <li>• vegetation</li> <li>• quiet</li> <li>• outlooks</li> <li>• safety</li> <li>• heritage</li> <li>• character</li> <li>• culture</li> </ul> |                          |
| 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   |   |                          |                          | <input type="checkbox"/> Community facilities (libraries, community spaces, social services, etc) |   |                          |
| <input type="checkbox"/> Landscaped spaces/plantings  |   |                          |                          | <input type="checkbox"/> Child care   |   |                          |
| <input type="checkbox"/> Parks and playgrounds  |   |                          |                          | <input type="checkbox"/> Medical facilities/centres   |   |                          |
| <input type="checkbox"/> Shops and businesses   |   |                          |                          | <input type="checkbox"/> Bicycle parking  |   |                          |
| <input type="checkbox"/> Cafes and restaurants  |   |                          |                          | <input type="checkbox"/> Other (please specify)   | <ul style="list-style-type: none"> <li>There are no future mass rapid transit stops planned for the Onslow area</li> </ul>  |                          |
| <input 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?<br><i>View this section of Our City Tomorrow (the Draft Spatial Plan):<br/>planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; 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?<br><i>View this section of Our City Tomorrow (the Draft Spatial Plan):<br/>planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; 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:<br><b>Te Motu Kairangi/Miramar Peninsula</b><br>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.<br><b>Strathmore Park</b><br>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 <b>community planning process</b> for the following areas?<br>8.1.1 <b>Te Motu Kairangi/Miramar Peninsula</b><br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure<br>8.1.2 <b>Strathmore Park</b><br><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?

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><a href="http://planningforgrowth.wellington.govt.nz/Draft-Spatial-Plan/View-Draft-Spatial-Plan/Natural-Open-Space">planningforgrowth.wellington.govt.nz &gt; Draft Spatial Plan &gt; View Draft Spatial Plan &gt; Natural &amp; Open Space</a></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.

- no consideration of character/amenities for outer suburbs such as Khandallah. We live here because it's a green area; this is very important to us. Large-scale housing intensification will put those green areas at risk.

- Khandallah has many attractive and substantial older houses, that appear to have been well looked-after. Such houses aren't necessarily pre-1930, but are character houses nonetheless. Many modern houses are also substantial and worthy of protection

14. Have you provided an attached document?

Yes  No

201012

1st fold here - fasten here once folded

2nd fold here

Free Post WCC

**Absolutely Positively  
Wellington City Council**

Me Heke Ki Pōneke

**Free**



FREEPOST 2199  
309/1039

Wellington City Council  
PO Box 2199  
Wellington 6140



# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [14685](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Peter Steven

**Suburb:** Highbury

## 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 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 don't believe that character should only be defined as only pre-1930s buildings. For example I love the unique character and feel of the area near Aro Valley park with the tall modernist apartment building. I don't really care about old wooden houses (in fact I somewhat resent them because I have had health issues from living in them), but I think it's important that any new buildings look good, enhance the local environment and contribute to the 'feel' of an area.

**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, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Access to cycleways/routes, 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?**

I like walking to the local four square to do a small grocery shop. I wish there was a library in my suburb (Kelburn).

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

I would love to see some outdoor gyms in Wellington - the only two places that I can get exercise outdoors are the pull up bars in Karori Park and Kelburn Park (these ones kind of suck too). An outdoor gym near the waterfront would be so cool. I have visited several cities (LA, Miami, Barcelona, Mexico City, Medellin) where they had outdoor public gyms (often near the beach) that even had barbell weights and bench presses (with chains so people can't steal them) and they are great places to get some exercise and be social. Working out outdoors is so great.

I also really want to see some proper cycle ways in the city. The lack of safe cycling infrastructure in this city is shocking. I think if the infrastructure existed then there would be a huge uptake in cycling and e-scooters. Personally I know a few adult males who are too afraid to ride a bike around town because they perceive it as dangerous, but they would probably give it a go if there was space dedicated to them.

Adelaide Road is begging for a cycle way. I also want to note that it's very hard to get around the CBD on a bike because of all the one-way streets and car parking. For example, from Courtenay Place to Lambton Quay the 'proper' way would be to go up Dixon and then down Willis, which feels extremely long. I personally ride up Dixon or Manners and then slowly down the footpath on Victoria Street, and will continue to do so until there is adequate infrastructure. It's frustrating that there has been no thought to bicycle traffic. Bikes require actual physical effort

whereas cars do not, and when you consider all the benefits of cycling to the local and global environment, it should be a priority to give cyclists shortcuts to get around the city quickly and easily.

## Non-Compulsory Questions

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

I really like that there will be more density in areas that are close to town and public transport links. I think it will make Wellington an even more vibrant and fun place to live. Hopefully it will also make housing in the city more affordable.

### 2. What would you change or improve?

I would get rid of the pre-1930 character areas completely.

### 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 it would be great if the spacial plan was integrated with a plan for future public transport lines and cycle ways. Transport and housing go hand in hand.

### 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.

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 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).**

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**

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?**

More density near the town center and around the potential light rail route.

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

Better public transport connections (it's a very inaccessible part of the city right now).

**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?**

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.**

**Have you provided an attachment? No**

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15975](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Phil Kelliher

**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?**

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?**

This figure can't be supported by the evidence.

Increases in the population can be distributed under the current rules in all areas.

There is no requirement for special provisions/rule changes in one area or the other.

**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?**

All, pre-1930s houses in inner-city areas need protection i.e. retention of the pre-1930s demolition rule

**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), Infrastructure (stormwater, water supply, wastewater)

**Other:**

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

Public shared spaces, Landscaped spaces/plantings, Shops and businesses, Cafes and restaurants, New housing

**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?**

walking around inner-city areas

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

none

### **Non-Compulsory Questions**

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

I'm struggling to find anything

**2. What would you change or improve?**

- More clarity about what the goals are and how they are going to be achieved.

3. - More robust analysis & input from stakeholders before going public

4. - Generally earlier and better (face to face) consultation/collaboration with key stakeholders

5. - A staged approach to the 30-year plan

6. - More work on what can be achieved under the current rules or if they were slightly tweaked ie no off-street car parking for infill housing in Mt Vic could result in a significant number of dwellings without compromising streetscapes & heritage

7. - Retention of heritage - more focus on heritage and what Wellingtons and visitors value about it & how to retain it, not how to remove it.

8.

9.

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

- More clarity about what the goals are and how they are going to be achieved.
  - 11. - More robust analysis & input from stakeholders before going public
  - 12. - Generally earlier and better (face to face) consultation/collaboration with key stakeholders
  - 13. - A staged approach to the 30-year plan
  - 14. - More work on what can be achieved under the current rules or if they were slightly tweaked ie no off-street car parking for infill housing in Mt Vic could result in a significant number of dwellings without compromising streetscapes & heritage
  - 15. - Retention of heritage - more focus on heritage and what Wellingtons and visitors value about it & how to retain it, not how to remove it.
- 16.

**17. 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 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.**

**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?**

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:

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

The DSP should not have delayed (at least 12 months) until the outcome of COVID-19 is better known i.e. working and living patterns

Have you provided an attachment? Yes

# Draft Spatial Plan – Phil & Carolyn Kelliher Submission

Over the last month I (along with others) have taken a petition door to door in Mt Victoria\* calling for the “retention of the pre-1930s demolition rule for all of Mt Victoria”. While this petition will form part of the Mount Victoria Historical Society’s submission I wish to pass on feedback from the wide range of residents spoken to including my observations. It is crucial to understand the views of the people “on the ground” to inform the decision making process.

*\*NOTE: The petition was taken door to door (there was no online version) and we tried to cover as much of Mt Victoria as possible given the limited timeframe. We deliberately did it this way to ensure we could engage directly with residents, inform them about the Spatial Plan (if they didn’t know already) and encourage them to make submissions etc.*

The views I am representing are from a cross section of residents and the sample size is significant (I personally door knocked over 500 houses) In this regard they represent the most comprehensive range views of people that are directly affected by the proposed Spatial Plan in Mt Vic.

In addition, I have wish to bring to the attention of the Council some other key aspects of the DFS & the detrimental effect on Mt Victoria’s heritage & residents.

## **PETITION FEEDBACK**

### **Tenants:**

- Significantly about 50% of the petitioners are tenants, which mirrors the approx. tenant/homeowner mix in Mt Vic
- Tenants love Mt Vic for largely the same reasons homeowners do -close to the city, sunny, quiet and its character.
- Rent is reasonably affordable because many properties have not had a lot of improvements over the years.
- Often tenants relocate to Mt Vic from apartments in the city as they find them noisy and prefer to live in a quiet inner-city neighbourhood.
- Developers will likely target “tired” rental properties. Tenants will have to move to suburbs further out as apartments built and rented under the Spatial Plan will not be affordable.



In summary, some of the very people that the Council believes the Spatial Plan is going to help such as renters are likely to be some of those most disadvantaged with the loss of their Mt Vic rental homes and having to relocate further out.

### **Home-owners - expressed a wide range of concerns**

- **No Resource consent to demolish and loss of qualities of life -**

The single biggest concern of homeowners relates to the proposal in the DSP that allows the demolition of pre- 1930 dwellings (in 62% of Mt Vic ) and erection 4-6 storey apartment blocks.

These could be built next door to them or if they live in a character sub-area in an adjoining street with all the associated issues i.e. loss of sun, views and quiet enjoyment. Where-ever they live in Mt Vic they will either be directly or indirectly effected.

The removal of the requirement to obtain a resource consent does not allow them to be heard and their particular circumstances taken into account. It is chilling to them that the first thing they might know about a development is when a digger appears! - they feel disempowered.

- **Loss of confidence to invest in/renovate their property -** Many homeowners that have renovated their houses said they may not have gone ahead or if they are thinking about renovating said they would reconsider it if there was a possibility an apartment building could be build nearby that would block their sun/views.

The outcome of this is that there is likely to be less renovation of heritage houses by number and less extensive renovation being undertaken.

- **Division in the Community -** Mt Vic is a very close community, physically and culturally. Many people walk to work and around their neighbourhood and as I mention under have lived in Mt Vic for a long time - they have built strong networks. The prospect of apartment blocks being built in scattergun approach through Mt Vic has the potential to pitch neighbour against neighbour - will their neighbour sell to a developer etc, what is going to happen? Who knows until it happens?. The strong and vibrant community that Mt Vic is today will gradually unravel over time.

Many home owners have lived in Mt Vic for a long time (the turnover in property in Mt Vic is significantly less than the NZ average ). They highly value their neighbourhood and its heritage. They do not want to move or be forced out by the advent of high rises apartment blocks.

### **Other Issues**

- **Boarding Houses** - I only visited one boarding house but I know there are more in Mt Vic. The Boarding house looked run down and the manager said the owner would not spend a cent on it. It occurred to me that this is the sort of property a developer is likely to purchase and build apartments. The question I have is where are all the residents of the Boarding House going to go?...I'm sure this is not the only run down boarding house in Mt Vic.
- **Schools** - There is only one primary school in Mt Vic - Clyde Quay School. A number of parents asked what provision there is for another school if a lot more residents are going to be living in Mt Vic?
- **Other Infrastructure** – Many residents questioned whether the existing infrastructure such as water supply, sewage and storm water, that was already under pressure was going to cope.

## **QUALIFYING MATTER**

The Council needs to designate the whole of Mt Victoria as a heritage area and for the pre-1930s demolition rule to continue to be applied across the whole suburb. It can do this under the NPS-UD 'qualifying matter'

Further, Intensification should be phased with 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.

The Council has chosen to use the term "character" rather than "heritage" & characterise some street as worthy of some degree of protection (sub-area character) & others that have diminished character and allow demolition of pre-1930s house without a resource consent.

The result is a "scattergun" approach to development in Mt Victoria which results in the worst of all worlds, i.e. whether a resident lives in a character sub-area or not they will be potentially directly or indirect effected.

### **Some travesties of the current approach include:**

- Austin & side streets off such as Rixon, Westbourne, Claremont – retains significant clusters of character dwellings
- Ellice St – included in the 2017 Council sponsored survey of MT Victoria as one of eight streets having high heritage value
- McFarlane St – narrow hilly street that is literally part of picture postcard identity of Wellington
- Brougham - retains significant clusters of character dwellings
- Tutchin – tiny dead-end street in the middle of a "character sub-areas"
- Moir – contains a unique collection of character cottages
- Earls & Vogel St – narrow hilly streets that contains many renovated character houses
- Queen and Elizabeth Streets Corners - within this area are many heritage houses

The Council does Mt Victoria a great injustice when it refers to "character" rather than "heritage". Character is qualitative in nature whereas although Heritage has a qualitative element to it is more a matter of fact and of course it extends beyond mere appearance to encompass; history, place and mana. Importantly, it also has precedent /legal status and is provides for a more robust approach.

On this basis the Council could reasonably determine the whole of Mt Victoria as a heritage zone and even if it retains the assessment of “character” 93% of Mt Victoria could qualify as a heritage zone as evidenced in the 2019 Boffa Miskell Report, refer key findings under. Thus, it would qualify under the NPS for an exemption as a “qualifying matter”.

### 3.8.1 Key Findings

The Mt Victoria Character Area comprises a total of 1031 properties. A breakdown of the overall contribution of these properties and associated buildings to the character of this area is as follows:

| <b>Character Contribution</b> | <b>Number/Percentage of Total Properties</b> |                  |              |
|-------------------------------|--|------------------|--------------|
|                               | <i>Pre-1930</i>                              | <i>Post-1930</i> | <i>Total</i> |
| <i>Primary</i>                | 333 (32%)                                    | 8 (1%)           | 341 (33%)    |
| <i>Contributory</i>           | 460 (44%)                                    | 17 (2%)          | 477 (46%)    |
| <i>Neutral</i>                | 79 (8%)                                      | 63 (6%)          | 142 (14%)    |
| <i>Detractive</i>             | 11 (1%)                                      | 60 (6%)          | 71 (7%)      |

Of this total 883 (85%) properties pre-date 1930. Those categorised as primary and contributory comprised the majority of the properties assessed within this group, accounting for 38% (333) and 52% (460) of the total respectively (refer to the Story Map separately supplied for further detail).

## THE ANALYSIS UNDERLYING THE DSP IS FLAWED

The 80,000 high growth figure assumes a high level of migration over the next 30 years, something that was never likely and even less so post COVID.

A more likely scenario is 46,766 new residents (Forecast ID Medium Growth) which translates to 24,929 new builds (including a generous margin). However we need to consider the existing capacity ie under the existing planning rules how many sites are available in Wellington that are both feasible to build on and that the Council thinks are likely to be built on over the next 30 years (20,294). If we deduct this amount from the required new builds we get just 4,635 or 155 dwelling shortfall per year.

The DSP sets out to provide an enormous amount of additional capacity from the outer suburbs, central city to the inner-city heritage or “character” areas. Why is all this additional capacity is being created when the Council’s own figures show the shortfall is relatively minor. It just does not appear to make any sense!

## CONCLUSION

Unfortunately, there are real word and irreversible outcomes if the plan is implemented as proposed... the outcome for “character” inner city areas like Mt Vic 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”***

...they are not my words they are quoted directly from the WCC report - Wellingtonians clearly value “Character” and it may be lost for NO GOOD REASON and when its gone its gone!

Residents told me Kent Terrace, Adelaide Rd and the CBD are ripe for development – start there, before bulldozing Mt Vic’s heritage.

Crucially, new apartments in Mt Victoria will not be affordable. Developers and land bankers will be the winners, not first home buyers and young people.

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## Online submission form ID 15366

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Organisation Name:** CCS Disability Action Wellington Branch

### 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?**

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?**

The proposal takes away choice for some people with disability. Three story walk ups limit where people are able to choose to live and assumes that people will always be able to manage multi level access.

Consideration and high desirability should be documented in the plan for access and universal design standards. The examples of medium and high density housing shown in the plan are not all accessible, even at ground floor level.

**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?**

The spatial plan should continue to choice of living. The areas with current Heritage protections may not be needed to meet the demand for high density housing. Well maintained, robust buildings should be retained to continue to

give character and diversity to our city. The character suburbs (Thorndon, Mt Victoria, Aro Valley, Mt Cook, Newtown and Berhampore) are recognised as collections of buildings which represent historic heritage, but which individually may not warrant scheduling as significant historic heritage places or areas.

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

Access to public transport, 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), Medical facilities/centres

**Other:** Vibrant centres need all of the above choices, plus great footpath infrastructure that is safe, well maintained and well lit. Access should be an overarching aspiration to leave no one behind in housing and public transport that serves the centres. Water,

#### **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.), Child care

**Other:** Drop off spaces. With all the new technology in moving people and improving access there will still be a need to consider privately owned vehicles, individual and group ownership. As rapid transit is not proposed to all suburban areas an integrated public transport system, should be a goal giving choice to travellers and leaving no one behind.

#### **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?**

Footpaths and open spaces.

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

Information - Since March there has been a significant change in information and communication moving to digital formats. For a large number of elderly and disabled this is a significant barrier to inclusion.

Changes to public transport were not communicated in ways that all people could understand, increasing isolation and fear for many in our community.

Public toilets are often not accessible. As the population ages there will be an increased demand on accessible public facilities.

### **Non-Compulsory Questions**

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

We like the high level statements that guide the plan, and the desire for planned growth for a better future.

2. Most liveable city.
3. Unique Wellington way and our creative culture, where businesses thrive.
4. Housing is affordable, we are accessible, safe, and we continue to live close to nature.
5. Where streets are made for walking.
6. Mana whenua culture is a living presence
7. from harbour to hills.
- 8.

#### **9. What would you change or improve?**

We would like to see high level aspirational statements that link directly to Three Waters, Accessibility and

Universal Design, and climate change included in a more visible way. These items should not rely on inclusion in a District Plan to hold value.

10. The aspiration of more green areas does not necessarily address climate control issues or address the climate crisis questions. We would like to see more specific reference to how we can plan to improve our clean water security under cycles of droughts and floods and decrease green house gas emissions through changes in transport, urban design and agriculture.
11. We would like to see a significant improvement in choice and affordability in housing and a target of the majority of homes meeting Universal Design Standards in the next 30 years.
12. We would like to see provision for the inclusion of privately owned vehicles.

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?**

Post Covid, people may change their previous thinking about where and how they want to live. Commuting to the city daily might not be an attractive option. The spatial plan should have the flexibility to meet the challenges of border controls, future viruses and pandemics that may result, and address rebuilding the economy.

15. The provision for education from pre- school to college, particularly in high density areas.

**16. 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.**

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.**

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.**

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.**

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.**

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).**

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?**

Land use opinion of Mana Whenua to lead discussions and impacts of mass transit route.

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

Housing development and intergrated public transport system.

**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?**

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.**

Wellington is always at risk from natural hazards like earthquakes, rising sea levels and flooding as a result of climate change. A commitment to ongoing consultation and co-design processes is desirable to build resilliance could be included in the plan.

I would like to speak to this submission.

Raewyn Hailes

Access Coordinator CCS Disability Action Central Region.

**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: [15399](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

---

**Submitter Name:** Rhys Phillips

**Suburb:** Island Bay

## 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?**

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?**

**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?**

X

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

Access to public transport, Commercial activity (retail, cafes, local businesses), Employment opportunities, 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?**

Shops and businesses, 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.**

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?**

F

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

F

### **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?**

The flat properties on the western side of Severn St North, being 12 - 34 Severn St, are also suitable for type 2 housing.

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

X

**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.**

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.**

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.**

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).**

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?

C

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

C

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?

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.

Have you provided an attachment? No

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## Online submission form ID 14364

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Organisation Name:** Matthew Pankhurst

### Compulsory Questions

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

Not sure

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

Not sure

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

Not sure

**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?**

Not sure

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

x

**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?**

Not sure

**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 Client owns the property at 94 Britomart St, Berhampore.

A review of the proposed pre-1930 Character Area Map overlay shows that the majority of Berhampore has been included in this area. However, there is a carve out for the shops, and the properties to the west of them including but not limited to 13 Palm Grove, which contains a large multi-storey apartment building, and 21 Palm Grove/98 Britomart St, which contains a large commercial/industrial building which is identified as being a mechanics garage.



My client's property at 94 Britomart St is occupied by Wellington Steel, a small scale metal fabrication business. The front of this site is occupied by a small office/administration building and carpark. The rear is occupied by a large recently built industrial building. Photos can be provided.

It is reasonable to assume that 98 Britomart St and 13 Palm Grove were excluded from the pre-1930's character area because they don't fit with the character area. My client's property at 94 Britomart St is located directly east of 98 Britomart St and directly south of 13 Palm Grove, it does not contain pre-1930's buildings and the existing buildings have an industrial character. As a result, it should be excluded from the pre-1930's character area. We request that this change be made.

Other matters

The Map Builder does not zoom in far enough. As a result, it makes it difficult to see exactly where the dividing line between zones and overlays is. The maps should allow you to zoom in to the same extent as you can with other WCC GIS maps.

The submission forms should allow you to attached photos and documents to support the submission.

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

Proximity to parks and open space

**Other:** x

#### **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, Bicycle parking

**Other:** x

#### **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?**

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?**

x

#### **2. What would you change or improve?**

x

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

x

#### **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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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.**

Not sure

**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).**

Not sure

**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?

x

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

x

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?

Not sure

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

Other: x

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

x

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: [15471](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Rhys weyburne

**Suburb:** Thorndon

## 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?**

Not sure

**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?**

The extra 80,000 people is nothing more than a projection and should not be spoken of as though it was a fact. It is so far above the historic growth numbers that have chosen Wellington as their home that it is hard to believe that it will come to pass and certainly does not justify allowing for Thorndon to have its character and old homes destroyed so developers can build apartment blocks as cheaply and intensively as they can. We already have enough buildings that are an eyesore that Wellingtonians have to put up with every day.

There is space for increased density, such as the railway side of Thorndon Quay, without ruining what we already have. The pre 1930s demolition protection rule needs to be maintained.

**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 old houses, the schools and green areas. Avoidance of developments made with no effort to provide any character or architectural value. Wellington has been blighted by cheap developments, particularly apartment blocks or apartment additions on top of existing buildings, that detract from the value of the city. Our airport, the first point of call for tourists (pre-covid!) has a new hotel which looks cheaper than the new carpark.

**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, Walkability within the centre

**Other:**

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

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, Cafes and restaurants

**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?**

green spaces

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

Access to school grounds

**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?**

It would be great if planning approvals could include an aesthetic element to them for multi-storey

developments. Every ugly building that goes up is an eyesore that will be there for 100 years. We have so many buildings that have obviously been built as cheaply as the developers could get away with but they chip away at the look and feel of the city.

**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.**

**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.**

**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 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?**

**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**



3 October 2020

**To**

Wellington City Council  
Draft Spatial Plan Submission  
PO Box 2199  
Wellington 6140

**By Email**

planning for growth@wcc.govt.nz

**Submission on the Wellington City Council Draft Spatial Plan**

I oppose the provisions of the Draft Spatial Plan (the **Plan**) as they apply to the residential areas of central Wellington, in particular Thorndon. I oppose it for the following reasons:

- The 80,000 population growth expectation seems very high relative to Wellington's history. If this level of population growth was to actually happen it would not be quickly and to remove protection from Thorndon for something that has never happened before seems excessive. I am a sixth generation Wellingtonian and, as much as I like Wellington, I am under no illusions as to how tough the climate of the windiest city in the world is on attracting people to live here.
- Rezoning land in Thorndon on the City side of the motorway from 'Residential' to 'Central Area' will see the destruction of the existing historic villas over time. There are better places on the railway side of Thorndon Quay that could be used for higher density development. There is no need to destroy some of the good architecture we have.
- It is so important to maintain the pre 1930s demolition rule. Without it, any opportunity to knock down a property with heritage and architectural value will be taken to maximise profit from the land use and once one or two are replaced with apartment blocks, they all will be. It is not all about money as the very poor quality of a lot of the apartment dwellings in Wellington are a blight that every Wellingtonian has to live with.

Kind regards

██████████

██████████ Hobson Street  
Thorndon  
Mobile ██████████  
Email: ██████████

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

## A City for the People submission ID 287

This submission was originally received through the A City for the People website:

<https://www.cityforpeople.org.nz/take-action>

### 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Name:** Stephanie Cairns

### I support the following statements:

I strongly agree with proposals to intensify the Central City, Inner Suburbs and Outer Suburbs to allow for compact, livable, low-carbon urban form.

I support council taking action to ensure everyone in Wellington can live in safe, warm, affordable housing that provides for a diverse range of housing needs.

I strongly encourage the council to partner with iwi and mana whenua, to ensure their aspirations are met, and the current decision making process while we plan for growth is decolonised

I strongly support the council meaningfully engaging with disabled people to ensure decisions about Wellington's growth and development provide for a truly accessible city

I support reducing the size of the character areas to focus on well-preserved sections while allowing homes in poor condition to be redeveloped

I believe that natural heritage and the heritage of mana whenua are important and should be celebrated, protected and enhanced.

I support focusing development along future mass rapid transit routes and agree that strong amenity value must be developed alongside

I support the establishment of safe and easy to use active transport routes alongside areas of development

I support the council developing a plan to make sure everyone will have access to high quality green space and public space

I support requiring new developments to manage stormwater through water-sensitive design

I strongly support council meaningfully engaging with marginalised communities to ensure they are heard and have input into the ongoing development of the Spatial Plan and related policies

I strongly agree with taking a city-wide approach to distributing density

**What excites you most about having a more compact and liveable Wellington?**

I'm excited about easier movement for people on foot and on bike, and the possibility of hyper-localisation (having access to everything you need within a 15 minute walk of your home). Relieving the pressure on housing supply is super important at the moment as housing costs are the number one issue for everyone.

Something that hasn't been discussed much is the impact of the housing squeeze on the arts. Over the past ten years, I have seen an alarming decline in the independent artist studio spaces and performance spaces which are the beating heart of Wellington's cultural vibrancy. This can be linked to the surging property market, as the kinds of forgotten spaces that artists can afford to inhabit have been snapped up and redeveloped. Hopefully a densified development landscape with ease the squeeze on space and enable the arts to continue thriving.

# **Our City Tomorrow: A Draft Spatial Plan for Wellington City**

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15073](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Stephen Minto

**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 Agree

**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?**

I don't think you have taken a city-wide view. There is nothing wrong with making more places available to live it's just your blanket approach to areas when you're not dealing with issues like heritage for inner city suburbs. City character and heritage is not there as 'region'. Your just looking like a green fields approach to development where this area lumps this amount of people. I suggest you find specific locations for quality high rises and tell people invest in this community living building. For example you must be able to buy some

sort of car yards - try using the Public Works Act if the need is so great. One in Taranaki st has been empty for year. Get it built yourself. They are just speculators. Tell them they have two years to build or they start paying a low use of land charge. You have to drive change. Single sites out where they won't impact neighbours or heritage. The semi-industrial areas are ripe for transformation. The market will stuff up the heritage areas because heritage is an externality to land value. The market will always find an individual who has to maximise the value to them, and then the community loses the heritage buildings and character forever. Your geographical areas (blotches) are too crude a mechanism. And your question is therefore misguided. i would intensify the city. e.g. perhaps along adelaide road just past the Basin. Lots of rubbish empty areas. Get the speculators sitting on it to do something. Not your crass broad brush. Kent and Cambridge Terrace need low land use charges to drive housing. Ideal location

**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 old buildings being retained as they are. Gardens largely retained. Yes completely refurbish them - e.g. get some sort of secondary glaze and sun in but the building in situ in important. Some extensions at the back if needed

You allowed the lovely great big building in Austin Street to be ruined. Great profit for the individual but the community paid the price in the heritage and city scape. Thanks council.

**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, Infrastructure (stormwater, water supply, wastewater), Walkability within the centre

**Other:**

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

Public shared spaces, Shops and businesses, New housing, 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.**

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?**

Green spaces.

**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?**

Your talking about greener. Your talking about public transport, your talking about intensification - just you've got no re plan on delivering it other than the 'market'. Which has consistently failed heritage and quality building. Heritage in particular

**2. What would you change or improve?**

I would get the car yard people and give them a time frame to build up. Council made a real problem with the car yard in lower Taranaki. You allowed him to go low cost to build buildings, and low rise. They made a killing that now everybody thinks there yards are goldmines - they are. But you're therefore not delivering your future that you lay out here. Not a good look.

3.

**4. Strongly disagree with the creation of the sub heritage areas. Keep the existing heritage areas unless there are some 'sites' on their boundaries that are truly fully semi-industrial areas. Development can occur there but only with community consultation.****5. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**

Council charges for low land use in semi industrial areas to promote the development of higher rise accomodation . Target 'sites', not areas, that have low impact on other residences, heritage or other community values.

6.

**7. I'm getting sick of you loaded questions further on. I don't want sub areas. Heritage gone is forever. It is the money card for tourism. Business will suffer if heritage goes.****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 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.**

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 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.**

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**

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?**

Let the residents have priority say. To me it needs more housing and better quality. Council could get this started. Really plan it.

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

Let residents say. I think it is too sprawling and nobody there has money to make the place nicer. It's still nice, sunny. Green spaces.



**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?**

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.**

This is about heritage. You're completely off track with it. The sub areas idea is just a simple reduction. The idea of letting the future housing need to be fully carried in the existing suburbs is negative and destruction. the ruined areas like the low rise semi industrial areas are the ones that should be made to update not the heritage areas.

Crack down on airbnb if you want to free up housing for long term resident rental. It might even free up houses to the buyers market. It might even spark some hotel building.

**Have you provided an attachment?** No

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [16272](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Steve Walters

**Suburb:** Lyaal Bay

## 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?**

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?**

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?**

Trees planted on streets is important, not so worried about the design/look of houses having to look consistent as things need to progress.

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

Proximity to parks and open space, Commercial activity (retail, cafes, local businesses), Infrastructure (stormwater, water supply, wastewater), Access to cycleways/routes, Easy walking distance to 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.), 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?**

Lyll Bay beach & Mt Albert walking tracks

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

Public fitness & workout machines along the parade for public use, like Bondi or the playground in Levin.

**Non-Compulsory Questions**

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

I like the way it intensifies the density of housing potential in built-up areas.

2. I like the way it emphasises densification around transport routes, stops and hubs to incentivise public transport use.

3. I like the focus on cycle tracks and walkways to

**4. What would you change or improve?**

I agree with increasing the building height in Kilbirnie to eight storeys to allow for population growth.

5. I strongly disagree with allowing buildings in Lyll Bay at the intersections of Onepu Road, Wha St and Apu Crescent for many reasons;

6. 1. Allowing buildings to be built up to six storeys in this area when the current buildings are two storeys is not consistent with the 5-point vision of 'Our City Tomorrow'. Multiple level apartments in a low-level residential zone will create more compact housing, but it will not create a more resilient community, not create a vibrant community, will not create prosperity, will not make the local Lyll Bay community more inclusive and connected and won't create a greener community.

7. 2. Mid & high rise housing in Lyll Bay will not create a 'welcoming home for all' as per the Vision for Our City.

8. 3. Allowing mid & high rise accommodation to be built will impact on the community well-being of Lyall Bay, as multiple dwelling accommodation will reduce a sense of neighbourhood and chance encounters among neighbours in an overwhelmingly residential area.
9. 4. High rise accommodation will impact on many people's privacy in Lyall Bay, severely impact on mental well-being.
10. 5. High rise accommodation in Lyall Bay will impact on sunlight access for many properties, impacting on people's mental well-being and severely impacting on the property values of current ratepayers.
11. 6. Allowing high rise accommodation in Lyall Bay will have major detrimental impacts on strained infrastructure of water and drainage.
12. 7. High rise accommodation with no car-parking required will negatively impact on the availability of carparking, which is already strained by current commercial activity from cafes and dairies in the area.
13. Higher building allowances to 8 storeys is good in Kilbirnie as it's a built-up commercial area, but 6 storey intensification in the residential suburb of Lyall Bay should not be allowed, instead allowing buildings of only one or two storeys to maintain consistency with the rest of the community.

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

No, you've pretty much covered it.

15.

16. **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.**

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.**

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.**

Neutral

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).**

Not sure

**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?**

Greater use by all, including housing, recreation and commercial.

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

Housing

**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:**

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

I support intensification in already built up areas, but allowing mid to high rise developments in 1 to 2 storey residential areas is going too far.

Many thanks,

Steve Walters

PS. I'm happy to come and discuss this in person further if desired.

**Have you provided an attachment? No**

# Our City Tomorrow: A Draft Spatial Plan for Wellington City

Online submission form ID: [15423](#)

## 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](mailto:planningforgrowth@wcc.govt.nz), or at Wellington City Council, 113 The Terrace, Wellington NZ 6011.

**Submitter Name:** Tracy White

**Suburb:** Khandallah

## 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?**

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?**

Look regionally, this is quite Wellington centric and in reality we are part of a bigger area and concentrating on development in areas that are being suggested does beg the question have you done a site visit or two

**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?**

Neutral

**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 think you are spending slot of time worrying about the inner city and not so much on the outer suburbs which will be impacted just as much by changes being proposed. Unless you control development how are you going to avoid effects of large multi storey building with potentially no car parking on Barrie streets that are ready too dangerous for biking. WCC will need to consider how they are going to provide safety for walkers and bikers with the densification around the existing street patterns WCC are proposing

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

Public/shared spaces, Infrastructure (stormwater, water supply, wastewater), 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?**

Public shared spaces, Landscaped spaces/plantings, 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 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?**

Walkability

Attractive surroundings

Less traffic

Access to open space

Peaceful

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

Better footpaths and provision for cyclists

Better bus links through the city

**Non-Compulsory Questions**

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

It is so general and lacking in specifics it sounds ok.

**2. The devil will be in the detail and I can only look around at the high rise development that occurred in Thorndon during the 50/60s and be concerned.**



3. How will WCC in reality be able to control de
4. **What would you change or improve?**  
Reduce the heights of buildings in the outer suburbs
5. Look regionally and make sure this stacks up
6. **Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?**  
Yes linking this plan in with what is happening in other parts of the region
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.**

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.**

Not sure

**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.**

Not sure

**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.**

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.**

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.**

Strongly Agree

6. **Thinking about the Lincolshire 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?**

People need to be included and brought along

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

Housing

Open space

Transport links

Schools

**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.**

I do not think you have universal support for what is proposed many people will have no idea what is in the pipeline. The district plan change will be problematic particularly in relation to the changes around heights and parking that

are in the NPS - they are way to broad bush and then for WCC to backfil areas behind these with even more densification will be interesting for people to get there heads around

**Have you provided an attachment? No**