



Submission on the Wellington City Council Planning for Growth - Draft Spatial Plan

Introduction

The Newtown Residents' Association has been an Incorporated Society since July 1963. We are residents and business owners from Newtown and the surrounding area, who take a keen interest in the community and local issues. We are concerned with maintaining and improving our area's liveability, connectedness and sustainability and working to make our community a thriving, diverse, great place to live.

The Association has a history of positive urban design action and active placemaking. Association members led a community based urban design project in the 90's, which has created the very liveable and walkable Riddiford St design. In fact we have a party every year to celebrate this community engagement, the Newtown Festival, still going 25 years later. The first street festival happened as a celebration of that project's completion.

Newtown Residents' Association has also been very engaged and involved with previous developments of the District Plan, and helped to create an urban design guide for the area. We regularly consult on a range of issues affecting the people who live, work and play in Newtown.

Consultation on the Draft Spatial Plan

We want to record our disappointment with the consultation approach to the Draft Spatial Plan.

This is a very important issue and consultation should have followed international best practice for engagement frameworks, where a high impact proposal deserves a co-design and active stakeholder management approach. There was a missed opportunity here. Widespread information about the proposals, perhaps with a letter box drop, posters in public places and advertisements in newspapers, could have been followed by forums and workshops which went beyond informing people about the proposals and gave the opportunity for people with different views to hear from each other and work towards a consensus, as described in 'Want to build high-rise homes for 74,000 more people in Wellington? Build consensus first' by Max Rashbrooke in The Guardian, 6th September 2020.

In practise, with this consultation, there was very little publicity generated by Wellington City Council, and the public debates that have taken place have been divisive and polarising. The pop-up events and requests for submissions were advertised on social media but only people who already followed WCC would have been sure to see them. As a result there are still many Wellington residents who do not know anything about these proposals. This is unfair given the impact the Spatial Plan will have on the next iteration of the District Plan rules.

Submission

The Newtown Residents' Association supports the need for additional, good quality and affordable housing, but we strongly disagree with the current proposals for Newtown in the Draft Spatial Plan for Wellington City.

Although we oppose the plan in its current form we do acknowledge the negative impact that high rents and the lack of affordable housing have had on younger people and people on low incomes.

- We do agree that we need to densify in smart ways and in the areas most suitable.
- We accept the growth number range proposed by WCC for Newtown and want to look at solutions to house these people.
- We support this problem being addressed holistically at a government level. The National Policy Statement – Urban Development 2020 is a bold urban move, but in this situation it is being used inappropriately as a blunt instrument with little allowance for local conditions.

Our reasons for our opposition to the current Draft Spatial Plan are:

1. It is a misuse of the National Policy Statement – Urban Development 2020 to use it as a reason to enable 6 storey developments in most of Newtown's residential area. The only basis for including Newtown in the NPS is that in future we might be on the route of a rapid transit system, but there is no rapid transit service in existence or firmly planned for Newtown.
2. The ability for developers to pepperpot 6 storey developments amongst existing 1-2 storey housing would have unreasonably negative effects on our suburb. This does not represent good urban design practice, and would not achieve the goal of 'Density done Well'.
3. The Boffa Miskel report '*Pre-1930 Character Area Review*' commissioned by WCC identified a much larger area with a coherent character than is designated a 'character sub area' in this Draft Spatial Plan. We submit that the current protections should remain.
4. There is a much better approach which could deliver a significant quantity of additional housing while retaining character and cohesion in the suburb. We support new development concentrated primarily within the current Suburban Centres zone.

Further explanation:

1. **Newtown and Berhampore should not be included under the NPS-UD2020 rules**

The Newtown residential area has been included in the NPS-UD2020 catchment requiring at least 6 storeys for new developments, under NPS Policy 3 (c) (i) as being walkable from "existing and planned rapid transit stops".

As defined in the policy "rapid transit service means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic." This doesn't exist in Newtown. Although it is talked about it seems to be a

long way from becoming a definite plan, and no route for a future service has been decided. We believe a plan means having decided a route, a timeline in the foreseeable future, and having the funding in place. Even if an enhanced public transport service is provided at some stage in the future it is unlikely that it would be able to be “largely separated from other traffic.”

In the discussion about a possible light rail or other rapid transit service two routes have been talked about - either up Constable St or along Riddiford St, Mansfield St and Roy St then in a tunnel through to Kilbirnie. The Draft Spatial Plan mapping has been done as though both routes are being used, so that the whole area is regarded as within walkable distance from possible future stops. This is not accurate, whichever future route was chosen there would be parts of the area currently designated as subject to these rules which would not be within walkable distance of a stop – particularly so if a 5 min timing was chosen.

2. Apartment blocks of ‘at least 6 storeys’ should not be allowed among low rise residential homes.

This is our main point of disagreement with the Draft Spatial Plan in its current form. In this Draft Plan most of central residential Newtown is zoned for type 4b housing, which allows new developments to be “at least 6 storeys.” A single-minded emphasis on increasing housing density risks losing the very qualities that make sunny sheltered Newtown a great place to live. Computer modelling shows that a single 6 storey building casts shade across a swathe of neighbouring homes. And the loss of sun is only one of the effects, there is also the loss of privacy, and the increased effects from wind deflected off the sides of tall buildings down into neighbouring houses and gardens. If the current plan isn't modified even Carrara Park, Newtown's only community park and playground, could be heavily shaded.

This isn't ‘Density done Well’. If WCC approves of enabling ‘at least 6 storeys’ then no amount of design rules can realistically avoid negative effects when a developer chooses to build to this height. Homes that are warm and dry now risk becoming cold and damp, reducing the quality of life and affecting the health of occupants of all ages in these neighbouring flats and homes.

District Plan Rules

The DSP also foreshadows “Amending specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed, and enabling the modernisation of older, less healthy homes.” This implies allowing new developments to proceed without the rules which currently protect neighbouring properties from effects such as shading and dominance from new buildings.

When the time comes for consultation on the District Plan rules we will advocate for retaining rules ensuring that whenever a property is developed it is designed in a way that avoids significant negative effects on the neighbours. This won't be achievable unless there are appropriate height limits, as well as other controls. We note that even 4 storeys, as allowed for in the type 3 housing zones, is too tall for most of the sites in Newtown.

Environmental Effects

There are also environmental effects associated with demolition and rebuilding. New building, particularly high rise, is very carbon intensive. On the other hand the existing old houses built of native timbers represent a great deal of embodied energy and sequestered carbon. Many have been adapted and upgraded over time, which is more environmentally sustainable than replacing them. Also these buildings are resilient and have survived 100+ years of earthquakes while many new buildings in Wellington have been badly damaged in earthquakes.

It is also necessary to acknowledge that if existing homes are allowed to become shaded then more energy will be needed to keep them warm and dry, and solar panels on these homes will not be able to operate as intended.

Affordability

A key objective for the Draft Spatial Plan is to provide affordable homes. Unfortunately the plan doesn't provide any answers about how this can be achieved. There is also an assurance that the homes will be well designed, and of good quality. Affordability and high quality seem incompatible when left to the market to determine the outcome of what will be built and what it will cost.

One of the arguments for having as much land as possible available for development is that concentrated zoning will put up the price of land. This may be so, but the residential lots that have been targeted are already surprisingly highly priced. In practice, whatever the land costs private developers will sell for whatever the market will bear, and if one lot of land is cheaper than another the expected result will be bigger profits for the developer, not more affordable homes. If the supply begins to outstrip demand then we would expect the developers to stop building and wait until demand increases.

In addition it is very expensive to insure high rise dwellings compared to low rise houses, and body corporate fees to maintain and repair high rise apartments have also become extremely expensive. This all adds to the expense of living in these dwellings.

We value the diversity of Newtown and we are already seeing it slipping away as more townhouses and apartments are built and both old houses and new apartments become more and more expensive. We are calling on the City Council and the Government to work together to use or create mechanisms for underwriting the costs of development and make affordability an achievable goal. We would also welcome an increase in social housing in Newtown, either City or State Housing.

3. Retaining Character Protections

The Draft Spatial Plan says it is -

Continuing to recognise the special characteristics of the broader area and enable opportunities for sensitive, denser development in these Character Areas, by:

- o *Re-focussing pre-1930 character controls on designated sub-areas within the Character Areas that exhibit a cohesive streetscape character.*
- o *Removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been compromised.*
- *Maintaining a continued emphasis on streetscape character in those areas outside designated sub-areas through retention of a general character overlay over these areas to ensure that new development respects the local streetscape and sensitively balances old with new.*

In the DSP Council have removed character protections from large areas of Newtown that the Boffa Miskell report 'Pre-1930 Character Area Review' (commissioned by WCC) said have coherent character. The Draft Plan says WCC are "removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been compromised.", but they have gone much further than that and removed protections from 6 out of 10 areas noted by the report as having coherent or consistent character.

The planners have chosen to protect areas of Newtown that are not representative of Newtown's history and character. Areas in the 'sub character zones' are mostly where wealthy merchants built their homes 100+ years ago, not the far more prevalent workers cottages.

Our strong preference is to maintain all the current protections for pre-1930s dwellings. This doesn't mean banning demolition altogether but it does mean that demolition continues to require resource consent. The new District Plan rules could then be negotiated with agreed standards for the conditions that would reasonably lead to demolition and rebuilding. They could also allow easier permissions for remodelling so that an existing house can become a multi-unit dwelling, or for constructing an additional 'tiny house' on the same section.

We also submit that blanket zoning for Type 2 housing - up to 3 storeys - in character sub areas, and Type 3 housing- up to 3-4 storeys - in other areas, is still inappropriate among one storey homes and should only be allowed when the design rules are sufficient to protect the neighbouring houses from significant negative effects.

We note the DSP assurances about "Maintaining a continued emphasis on streetscape character in those areas outside designated sub-areas through retention of a general character overlay over these areas to ensure that new development respects the local streetscape and sensitively balances old with new." This would be impossible to achieve while such disparities in building heights are allowed.

4 There is an alternative that provides increased housing and the potential for 'Density done Well' in Newtown - concentrate development in the area already zoned 'suburban centre'.

We agree with the need for more housing, and we support increasing density by concentrating taller buildings in our commercial main streets, as outlined in the Newtown Residents' Association [May 2019 submission](#) to the first round of Planning for Growth Consultation.

Martin Hanley and Anna Kemble Welch, who are architects and urban designers, have drawn up 'proof of concept' plans to show that intensification along the main streets, and mostly within existing Suburban

Centres zoning, could provide up to 2,000 or more new dwellings. This far exceeds the current projections of the Draft Spatial Plan for the whole Newtown area – the most recently released figures predict 487-759 new dwellings will be needed, to house 1289-2011 people. Martin and Anna will also be submitting independently on these proposals.

Our Association would prefer the height limit to be 4 storeys in most of this area (as in our original submission) but if 6 storey developments are required they are better situated here than among one and two storey homes on the residential streets. This plan takes care to protect the historic shopfronts by building developments behind them.

'Density done well' usually involves a precinct developed in a coherent fashion. If this could be championed in our Suburban Centre, along with similar development in Adelaide Rd, there is the potential for something quite exciting to emerge. High-quality multi-use developments in the commercial streets would bring vibrancy and opportunities with trade, commerce, hospitality and entertainment at street level and apartments above.

We also support Intensified housing along Kent and Cambridge Terrace and Adelaide Rd to John St, along the transport corridor, densifying on the bus route and reducing car dependency.

When new dwellings are concentrated together it is easier to upgrade the infrastructure to match the increased density, making this a practical solution to one of the major issues with the current DSP.

Conclusion

We support the provision of more and more-intensive housing in Wellington and in Newtown. However this should not be at the expense of the human scale of the existing character low-rise residential areas. A phased approach to the application of this plan needs to ensure that developers cannot start with picking off small areas amongst low rise housing for 6 storey developments. Development should be concentrated initially on the commercial spine of Newtown and on brown field sites that might lend themselves to a more intensive development as has been done recently, adjacent to Mansfield St. As time goes on this could be extended further into the residential streets as the need for this is demonstrated.

We are very keen to work with Wellington City Council to ensure a good outcome for the Council and for Newtown residents.

Thank you for the opportunity to make this submission. We would like the opportunity to speak to Councillors about it in the appropriate forum.

Rhona Carson

President, Newtown Residents' Association

5th October 2020