



Submission on the Wellington City Council Draft District 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. The first Newtown Festival Street Fair in 1997 was a celebration of that project's completion.

The 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.

Preamble

Firstly, the big picture. We will make comments about some specific Draft District Plan provisions later in this submission.

We have fundamental disagreements with the premises that underlie this Draft District Plan. These come from the Government's Urban Growth Agenda, later expressed in the National Policy Statement on Urban Development. In August 2019 when the Hon Phil Twyford, as Minister for Urban Development, announced the release of the NPS-UD he said "Our cities are failing. Restrictive planning is stopping our cities from growing, driving up the price of land and housing, and is one of the big drivers of the housing crisis". In fact there is little hard evidence that restrictive planning is the major cause of the housing crisis. While planning does have a part to play, this statement ignores many other factors affecting the cost of housing and the supply issues, including the lack of Government investment in this sector over several decades.

In the attempt to reverse the perceived planning restrictions, the NPS-UD prescribed the requirement for local authorities in the larger and faster growing cities to maximise development capacity in city centres and to enable developments of at least 6 storeys within a walkable catchment of city centres and mass rapid transit routes. Ironically this 'one size fits all' policy is at odds with the recently published Government Policy Statement on Housing and Urban Development (GPS-HUD).

The GPS-UD says "We will take a place-based approach. Every community has their own housing and urban development challenges and opportunities and a 'one size fits all' approach will not work to address them. This is because every place is unique, with different characteristics – including challenges or problems – arising from local history, culture and heritage, geography, economy, and resources." (p14). This is a Government policy approach that we wholeheartedly support, but unfortunately it isn't being put into practice.

The Wellington Spatial Plan, which proposes up-zoning across large areas of Wellington, followed the beliefs about restrictive planning and supported the NPS-UD requirements. Its supporters have said that it is unrealistic to live in a city and expect to have a garden, or even to have a sunny home. However Wellington isn't London, Paris or Tokyo. It's not even comparable to Auckland. It is doing a disservice to Wellington and Wellingtonians to assume the challenges and burdens of a mega city when, with careful urban planning, our 'cool little Capital' can

afford to retain the character of its diverse suburban communities *and* still build enough new homes to house the homeless and make room for future growth.

The popular narrative about the housing crisis is that widespread up zoning and deregulation and a competitive market provide the only alternative to homelessness on the one hand or forcing people into new suburbs on the city outskirts on the other hand. We agree that 'urban sprawl' should be avoided. However we are equally dismayed by the prospect of 'development sprawl', with scattered apartment blocks sprawling across the suburbs and destroying the unique character that lies at the heart of Wellington's liveability.

No one expects the entire area designated for up zoning in the draft District Plan to be developed, and in fact an uptake figure as low as 14% has been talked about. Every high-rise development on an unsuitable site will cast shade across a wide area of low-rise neighbours, and the loss of sun is only one of the problems. 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.

When the demand for new developments is satisfied and the developers move on the remaining 86% of the area will be left with diminished liveability, and in many cases previously warm dry homes will now be colder and damper. What's more there will always be the possibility of further development in the future, reducing any motivation for people to invest in home improvements. The whole process is likely to increase the number of unsatisfactory rental properties, not reduce it, as some owners move out of their no-longer-desirable homes.

There is an alternative vision, supported by urban planners and others with experience in the field, that a 'win-win' solution lies in working with communities and using local knowledge to identify where new housing could be best located, and at what scale, to enhance or create thriving communities. High rise buildings do not sit well amongst one and two storey homes, but well designed low rise developments could do so. There are also many underutilised sites where thousands of new medium to high rise apartments could be developed and would provide a welcome addition to the available housing choices.

Demolishing housing to build housing doesn't increase the supply nearly as efficiently as building housing where there was none before. The Newtown community has already outlined plans that provide more than 2000 new homes. Selective upzoning of areas enables substantial mixed use apartment developments to be accommodated without significantly affecting the rest of residential Newtown. We will continue to advocate for innovative approaches such as this to be adopted and supported by District Plan provisions.

Submission on the Draft District Plan

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 District 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, and we support solutions for housing more people without negatively affecting the housing we already have.

- We submit that we need to densify in smart ways and in the areas most suitable. The Draft District Plan will not enable this.
- The National Policy Statement – Urban Development 2020 is a bold urban move, but it is based on a belief that the primary reason for a lack of housing supply is restrictive planning rules. There is little if any evidence that this is the primary factor in the housing crisis.
- In addition to the above it is clear that the NPS-UD, and latterly the RMA Amendment Bill, were developed as solutions to perceived difficulties in Auckland. They were not crafted for Wellington conditions, or for elsewhere in the country. These Government dictates are being used as a blunt instrument with little allowance for local conditions.

- The potential for adjustment to local conditions is in the allowance for ‘qualifying matters’ to modify the blanket up-zoning requirements. Unfortunately Wellington City Council have had very little interest in exploring the possible application of qualifying matters in the Wellington context.
- 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’.
- 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, as in the Red Design plan for Newtown which has already been presented to Wellington City Council.

Specific Objections to the ‘walkable catchment’ and to the designated heights in the Draft District Plan

As will be obvious from what we have said already, we object to the heights the Draft District Plan has prescribed for Newtown. We also object to the way the ‘walkable catchment’ is defined.

We realise that in following the NPS-UD the planners felt constrained to enable ‘at least 6 storeys’, which translates to 21m, within the ‘walkable catchment’ from the city centre. In this Plan the Wellington City boundary extends to the Adelaide Rd/ Riddiford St intersection. This is a long way from the CBD, and it is about another 30min walk from the boundary to get to the city proper. Measuring the walkable catchment from this point is already erroneous, and extending it to 15 minutes walk, which is more than the NPS-UD requires, results in an area which reaches as far south as Harper St and across to Donald McLean St being included in the catchment. This is damaging enough, but there is no apparent reason for then continuing with the 21m designation across several more blocks further south again, outside the walkable catchment. Ideally we would like to see a complete rethinking of designating any of residential Newtown for 21m heights, particularly as this limit is likely to be increased in practice if a developer applies for this. Setbacks and other requirements which are usually applied to protect a reasonable level of amenity for the neighbouring properties become irrelevant as there are no such provisions able to prevent shading and all the other damaging effects caused by a 21m+ building surrounded by one or two storey homes.

Even without this desired outcome there are specific matters needing attention:

Lack of protection for the character precincts

The character precinct east of Owen St is designated for 11m but there is an abrupt change to 21m outside the precinct, meaning that homes within the character precinct will have no protection from the effects of the potential highrise buildings. There are similar problems to the west of Rintoul St, around Colombo St and Adelaide Rd.

Lack of sunlight protection for Carrara Park and Mercy Park

The walkable catchment area allows for 21m along half of Harper St, to the north of Carrara Park, and 14m along the rest of the street. The streets on the southern and western boundaries of the Park are designated 21m, and in the case of Regent St on the southern border this is outside the walkable catchment area. There are similar issues with Mercy Park - on the north and west it is enclosed within the St Anne’s School grounds, but on the east and south are residential streets with the 21m designation. Unless these conditions are modified our main public parks, particularly Carrara Park, could be deeply shaded. We understand that the planners are looking at amendments to avoid these consequences, so we sincerely hope that these are actioned.

Environmental Effects - a potential addition to Qualifying Matters under the NPS-UD.

We submit that the damaging environmental effects of high rise developments in established low rise communities should be considered a ‘qualifying matter’ for modifying building heights and encouraging retention and adaptation of existing housing stock, under NPS-UD clause 3.32 (1) (h).

Reducing emissions and protecting against climate change is meant to be one of the purposes of the NPS-UD rules, but the consideration of this is limited to rules that encourage people to use public transport.

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.

The other major environmental effects come with the loss of sunlight. Sunlight is important for a carbon-zero lifestyle – it fuels solar panels, helps gardens grow, dries the washing, and heats people's homes. If tall buildings are able to overshadow low-rise homes the latter risk becoming cold and damp. Solar panels won't work, extra energy will be needed for heating and drying, people's physical and mental health will be compromised, and in some cases the homes will become unfit for purpose. Sunlight is vital for everyday life.

We also submit that allowing extensive redevelopment which removes the existing trees and other plants in Newtown's backyards does permanent damage to the natural biodiversity of the area. Newtown resident Paul Forrest has made an extensive submission about this; we won't repeat all of his arguments here but we fully support his submission.

In 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 and liveability of the existing 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 other 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.

'Density done well' usually involves a precinct developed in a coherent fashion. This is possible on some bigger groups of underutilised sites. In addition, 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 are very keen to work with Wellington City Council to create a way forward to secure a good outcome for the Council and for Newtown residents, both present and future.

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
December 14th 2021**