



Submission

by the

Victoria University of Wellington

Students Association (VUWSA)

on the

Wellington City Proposed District Plan

2022

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To	Wellington City Council
From	Victoria University of Wellington Student's Association (VUWSA)
Date	2nd of August 2022
Subject	Wellington City District Plan
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This submission is prepared by the following individuals on behalf of the Victoria University of Wellington Students Association (VUWSA): Katherine Blow, Gwen Palmer Steeds, Monica Lim, Hana Pilkington-Ching, Sophia Honey and Alyssa Fa'afua. We **would** like to be heard in support of our submission in person. If others make a similar submission, we **will** consider presenting a joint case with them at a hearing.

We could not gain an advantage in trade competition through this submission. We **are not** directly affected by an effect of the subject matter of the submission that adversely affects the environment, and does not relate to trade competition or the effects of trade competition.

1. City Centre Zone

Enabling high-density housing

VUWSA is strongly in support of all moves towards higher-density housing. WCC has a crucial role in encouraging and enabling increased housing supply, to meet the desperate need in our city and doing so in a sustainable way. Significant housing supply increases are necessary and effective in improving housing affordability¹.

The housing crisis disproportionately affects students, particularly housing unaffordability and poor housing quality. According to the People's Enquiry Into Student Wellbeing 2022, students in Wellington spend an average of 56% of their weekly income on rent, well above the housing affordability standard of 30%². One in six students report that their housing doesn't meet their needs³. This has terrible impacts not only on student wellbeing but for Pōneke Wellington as a whole.

We fully support the specific focus on high-density rather than all housing supply, as high-density housing is a more sustainable, affordable, and resource-efficient approach, and promotes connectivity within the city. Further steps can be taken to ensure housing quality, affordability, and accessibility.

Transport and sustainability

VUWSA fully supports the emphasis on pedestrian and public transport access and the active prioritisation of this in development. We also support the discouragement of ground-level car parks in the city centre; our city should serve people first, not cars. Students should be able to easily move around the city without needing a car. This is obviously important for sustainability, but also for the well-being and connection of communities within the city. We believe that a range of transport options should be accommodated to serve diverse transport needs, including active, public, taxis/ubers, and mobility vehicles.

City centre design to serve students

¹ <https://doi.org/10.1080/10511482.2018.1476899>

² pp. 33,6

<https://static1.squarespace.com/static/5f0515b1b1a21014b5d22dd6/t/62d4b1aa20f3367350086d1b/1658106319006/CS+Student+Inquiry+2022.pdf>

³ p. 32

<https://static1.squarespace.com/static/5f0515b1b1a21014b5d22dd6/t/62d4b1aa20f3367350086d1b/1658106319006/CS+Student+Inquiry+2022.pdf>

The vibrancy, accessibility and functionality of the city are some of its most important aspects for students. Our sense of place in Pōneke Wellington is determined by our ability to live here well, and what we're able to do here, rather than by the protection of heritage buildings, character housing, private space, skylines and aesthetics. This is particularly so when the latter priorities compromise the more important functions of the city. We fully support prioritising mana whenua input into development and design, and design which acknowledges the history of this land, and consider this a much more valuable restoration of history than heritage and character protections. City "identity" is much better promoted through prioritising affordability, accessibility, well-being, functionality, arts, nature, and public space. This brings a sense of place which all people can benefit from.

Housing equity and accessibility

VUWSA agrees with the approach of providing a wide range of housing options, however, this should go further to prioritise equity and accessibility. We want strong provisions and mechanisms to ensure that affordable and accessible housing is prioritised over other developments. This will benefit not only groups who depend on these provisions, but the health of our city as a whole. The "curb-cut effect" describes how designing and planning to benefit vulnerable groups - in this case, housing-disadvantaged groups - often ends up benefiting all of society⁴. We believe that this concept needs to be more clearly recognised by the district plan and made a central priority in its approach to increasing the housing supply.

2. Character Precincts Design Guide

Students are facing the worst of the housing crisis. The lack of supply and good quality housing is at the detriment of our mental health, physical health, and ability to experience and live well in Pōneke Wellington. The status quo of housing typologies such as character housing does not serve the diverse needs of our communities. The District Plan has the opportunity to change this and enable different types of housing that better reflects the desires of the community, especially housing such as townhouses, co-housing, papakāinga, block housing and more. Housing is one of the greatest issues of our generation. We support the strategic direction in the District Plan to increase housing choice and affordability.

⁴ https://ssir.org/articles/entry/the_curb_cut_effect

Many students in our community live in character housing which does not meet their needs as it is often damp, cold, uninsulated and in general disrepair. Therefore VUWSA has brought the following rules into question, as they seek to keep character housing in place and protect something which is not serving our community and prevent newer, warmer and drier homes from being built.

In regards to MRZ-PREC01-O1, we do not support this purpose as it protects character housing through minimising the further erosion of character, providing for their ongoing use and development that maintains or enhances their character and ensures development recognises and responds to the character values of the Precinct. Instead, we propose that character housing is not protected or prioritised over newer non-character residential dwellings.

Rule MRZ-PREC01-P1 maintenance of character is also not supported by VUWSA as it limits any alterations or existing development in Character Precincts to be in line with the character of the area. This does not allow for more modern housing or work towards warmer or drier homes and instead maintains the status quo. We request this rule be set aside to prioritise the high standard of safety, accessibility, and warmth of dwellings instead.

Rule MRZ-PREC01-P2 restrictions on the demolition of pre-1930 buildings should be considered to include post-1930 buildings as there are slightly newer buildings that also meet this threshold of low contribution to an area and being in poor condition. We request this rule be set aside.

Rule MRZ-PREC01-P3 pertaining to intensification within character precincts is generally supported by VUWSA except in regards to 'detract from the character' as this poses further limits on what can be built in the area. We request this rule be set aside.

3. Design Guides

VUWSA supports the strategic direction of the District Plan to develop quality homes and urban environments that are compact, attractive, functional and inclusive. Pōneke Wellington

urgently needs more housing to support its increasing population. We need housing to be safe, affordable and of high quality and functionality to support our community.

We support the endeavour to make the design guides more simplified and accessible as well as limiting the potential for different interpretations of the design guides. We also support higher-density urban form and living and the prioritisation of public outcomes over private amenities.

4. Centres and Mixed-Use Design Guide

VUWSA supports the allowance of taller buildings given that this promotes growth in and around our centres and that these buildings are built with an accessibility focus in mind. This would ensure that people can exist in this space comfortably, thus allowing for thriving and vibrant centres – especially in areas of employment opportunity and accessible services. Vibrant centres and public spaces are important to the growing student population and families.

VUWSA supports the encouragement of residential development in centres and introduces new standards to ensure the quality of this. This means that these newer developments and buildings will reflect health and safety standards and be cheaper in the long run. Improved building standards, will also mean that the centres and businesses are more prepared for climate change and natural disasters.

VUWSA supports the use of ground-floor level buildings in centres to be used for non-residential activities. This will add to the compact urban form that Pōneke Wellington has, and also makes centres themselves feel more open, accessible, and interactive. These spaces will foster a neighbouring effect and offer up opportunities for students to use these places for connections that are outside of campus. This will give centres a more ‘human design’ and they will continue to be used as such spaces in the future.

VUWSA supports the continuation of providing for mixed-use areas that enable commercial, light industrial, recreational, and community activities to occur. This presents Pōneke Wellington as a more open city and centres and businesses will continue to profit from this. This will cause students to feel more comfortable about using these mixed-use areas for their

own purposes. Having students in these mixed-use areas continuously has significantly good flow-on effects.

VUWSA recommends continuing to provide for industrial areas, given that this results in areas that comply with health and safety standards. This means that industrial areas will be safer for operational purposes, and ensure that people who continue in this space will not be negatively impacted by doing so. This also means that neighbouring spaces and people around the industrial areas will also seek to be positively impacted by this insurance. Both groups can know and feel safe and comfortable within their own spaces as well as whenever these spaces and groups interact.

5. Ecosystems and Indigenous Biodiversity

VUWSA supports greatly increasing the protection given to outstanding natural features and special amenity landscapes. These are important features that frequently house ecological biodiversity, act as carbon sinks, and add to the vibrant character of Wellington City. We support the limiting of activities that can occur within natural landscapes, by requiring extra resource consent for additional buildings or earthworks.

VUWSA supports that public access is maintained along the coast, lakes and rivers. However, we recommend that provisions allow for the practice of rāhui to be implemented when there is a threat to biodiversity from human activity. Rāhui may be implemented by the local iwi or a relevant member of the council. This is an important addition to ECO-P4, as an important part of Māori conservation practice. This will allow certain protected species to thrive and be free from human interference for brief periods when there may be a threat of particular vulnerability.

VUWSA affirms that building activities around the coast should be restricted to protect biodiversity, natural character, and amenity values, according to the provisions in ECO-O2. Regulations should acknowledge a large range of indigenous birds nesting around the Pōneke Wellington coastline and recognise that any expansion of the city, including the extension of airport runways, may threaten their habitats. Section 6(a) of the RMA identifies the protection of the natural character of the coastal environment from inappropriate subdivision, use, and development as a matter of national importance.

6. Future Urban Zones

To meet the demands of a growing population over the next 10-30 years, it is clear that larger urban intensification must take place. We support the growth of urban activity in Lincolnshire Farm and Upper Stebbings/Glenside West which will lead to 2000 and 650 new dwellings respectively. Increasing the volume of houses will assist in making renting and buying more affordable for students. This will also be helpful in building connections between Wellington City and Porirua, expanding the area of liveability and making use of valuable land.

We also support growing new urban centres in other highly connected suburbs, such as Khandallah. These have the capability to service an intensified community and provide an urban centre for business and recreation. We must focus on the growth of urban areas along transport routes and in suburbs with easily accessible transport lines. The train line to Khandallah in particular is the fastest train route on offer in the Wellington network and operates every 15 minutes, making this ideal for intensification.

VUWSA supports the goal of UFD-O2 that urban development must be ecologically sensitive and connected to the public transport network. There is a need for compact urban forms to reduce the city's carbon emissions and the need for residents to travel in private vehicles. There must be care taken to monitor the effects of any urban development on native birds or trees in the surrounding areas. This will include effects from building emissions or from land disruption.

7. Sustainability, Resilience and Climate Change

VUWSA is strongly in support of all moves towards climate justice. We support the proposed District Plan's intentions of 'growing up', instead of out and creating compact city infrastructure, and are in support of actions taken by the District Plan to support the Council's Te Atakura – First to Zero policy. However, we believe that the proposed Plan is not ambitious enough and does not adequately recognise that we are in a climate emergency. The 2022 Intergovernmental Panel on Climate Change (IPCC) *Summary for Policymakers* report⁵ describes both near-term risks as well as mid- to long-term risks. The District Plan should

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https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

take this into account and plan and revise the District Plan, as a living document, with the specific warnings for these time frames in mind – particularly focusing on preparing for long-term consequences.

We strongly support the goals of compact housing, retaining natural open spaces, and infrastructure that supports the prioritisation of public transport, pedestrians, cyclists. We strongly believe that climate resiliency requires a holistic approach and should include more housing and city areas which have a people-centred design. We understand that in areas in Pōneke Wellington it is difficult to accommodate for pedestrians and cyclists due to narrow roads or environments with steep hills, however, we would recommend that WCC aims to support the safety and accessibility of pedestrians and cyclists even in such areas. We support TR-P1, TRP2, and TR-P3.

We believe that maintaining natural open spaces is an excellent initiative to improve community, wellbeing, and connection with nature. Mental health is going to be adversely impacted by the climate crisis⁶ and connection with nature not only can have mental health benefits but can also mobilise climate or environmental action and action. Mental health is of particular concern to students and VUWSA recognises the importance of spaces which support connection with both community and nature to uphold wellbeing.

The IPCC *Summary for Policymakers* report explains that in terms of adaptation and preparation for climate change:

“The largest adaptation gaps exist among lower income population groups (high confidence). At current rates of adaptation planning and implementation the adaptation gap will continue to grow (high confidence). As adaptation options often have long implementation times, long-term planning and accelerated implementation, particularly in the next decade, is important to close adaptation gaps, recognising that constraints remain for some regions (high confidence).”

We would advise that Wellington City Council takes full heed of this warning and plans now in order to protect our most vulnerable communities in the future. Increasing climate resilience in Pōneke Wellington looks like addressing poverty. This involves the District Plan

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https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

supporting the creation and maintenance of affordable, warm, dry and safe housing, infrastructure and spaces that support community-building and inclusion, improving shelter conditions, and more. The needs of the private sector are often over-represented in city planning and development plans, however to improve climate resilience and social justice, vulnerable communities need to be at the front and centre of our plans and city design.⁷

8. Natural Hazards

VUWSA supports the proposed changes to how the District Plan attempts to address and reduce risk from natural hazards. We would like to give support to Rules for Infrastructure INF-NH-R58, INF-NH-R59, and INF-NH-R60.

Since the beginning of July, there have been nearly 700 slips in Pōneke Wellington.⁸ The largest of these slips was on The Terrace which has had a large impact on residents in the area, requiring some to evacuate and road closures blocking off a large area of The Terrace.⁹ Delays in public transportation, road closure, and damage or risk to property have been of a particular issue to students at Te Herenga Waka Victoria University of Wellington in regards to this recent example of natural hazards.

In order to reduce the risk of natural hazards, it is important both to have plans in place for emergencies and have a strong sense of community.¹⁰ Unfortunately, many students are not currently in such a position. According to the Peoples' Inquiry into Student Wellbeing 2022, approximately two-thirds of students frequently cannot afford basic necessities, such as food, clothing, bills, and healthcare.¹¹ Students in this position cannot afford extra supplies for emergency preparation. As well, 14% of students live in accommodation that is not fit for standard and does not suit their needs, which may increase the risks natural hazards pose for their rental property.¹²

⁷ <https://www.theguardian.com/housing-network/2013/nov/07/planning-poverty-reduction>

⁸ <https://www.rnz.co.nz/news/national/473258/wellington-landslides-670-slips-in-seven-weeks>

⁹ <https://www.geonet.org.nz/news/5ZikZnyKPGa5h0MXEpiIWn>

¹⁰ <https://www.wremo.nz/assets/Publications/Community-Resilience-Strategy.pdf>

¹¹ <https://static1.squarespace.com/static/5f0515b1b1a21014b5d22dd6/t/62d4b1aa20f3367350086d1b/1658106319006/CS+Student+Inquiry+2022.pdf>

¹² <https://static1.squarespace.com/static/5f0515b1b1a21014b5d22dd6/t/62d4b1aa20f3367350086d1b/1658106319006/CS+Student+Inquiry+2022.pdf>

Consequently, due to this vulnerability of the student population to the risks of natural hazards, VUWSA is supportive of efforts WCC takes to mitigate such issues. We are glad to see that the Proposed District Plan includes increased restrictions on building in areas that are deemed at higher risk of natural hazards, such as flooding, earthquakes, tsunamis, and more. The efforts to update mapping and projections, such as sea level rise, should be commended. While such building restrictions are unlikely to directly affect many students, it is excellent to see that any new builds that become rental properties will have controls in place to reduce risks. However, due to concerns over affordability, it is more likely that students will be renting older properties. If maintenance of existing infrastructure to mitigate the risks of natural hazards is not mandatory, this could place renters at risk.

Community resilience is an incredibly important factor in terms of natural hazard response. Currently, we know that students, and the population in general, is experiencing high levels of isolation, exacerbated by the Covid-19 Pandemic and the Cost of Living Crisis. VUWSA believes in the importance of creating community spaces. Infrastructure that facilitates bringing people together, in a safe and accessible space, will improve communal well-being and strengthen our response, communication channels, and overall resilience in the face of natural hazards.¹³

9. Renewable Electricity Generation

VUWSA would like to see significant efforts towards climate action as part of the District Plan and recognise the importance of renewable energy generation to meet this goal. We support REG-P8 and REG-P11 upgrading existing renewable electricity generation activities and believe it is important to ensure the maintenance and improvement of our renewable energy infrastructure. In principle, we support REG-P4, REG-P5, REG-P6, REG-P7, REGP9, and REG-P11, developing new small-scale, community-scale, and large-scale renewable electricity generation activities.

In regards to REG-S1 standards regarding trimming, pruning or removal of indigenous vegetation we believe that increased protection needs to be given to ecological sites of importance, habitats for endangered species, and native biodiversity. Such sites need to be treated as the *homes* of animals and as crucial to the survival of our wildlife first and

¹³ <https://www.wremo.nz/assets/Publications/Community-Resilience-Strategy.pdf>

foremost, not just seen in terms of their development potential. Native animals also need to be considered when planning large-scale renewable electricity generation activities, such as potential repercussions of noise that may impact native birdlife. We support the development of new large-scale renewable electricity generation activities not being allowed in SCHED7 Sites and Areas of Significance to Māori, SCHED6 within the root protection area of a tree, and SCHED10 Outstanding Natural Features and Landscapes, and SCHED12 High Coastal Natural Character Areas.