

LIVE WELLington submission

District Plan - Hearing Stream 1

February 2023

1. Our argument – a summary

LIVE WELLington is a grassroots organisation set up to champion density done well. We were established following the spatial plan decisions and have been involved in the District Plan process ever since. While we are interested in the whole of Wellington city, our main focus has been on the changes proposed for the inner city suburbs: Thorndon, Kelburn, Aro Valley, Mt Cook, Newtown, Mt Victoria and Oriental Bay.

We support the provision of more housing in our city, but we are worried that too much emphasis in the proposed District Plan is on the loosening of planning restrictions, without due consideration to good urban design principles, preservation of amenity, character and green spaces, and resilience to natural disasters and climate change.

There is no point growing a city if we get it wrong.

In Hearing Stream 1, the main issue in contention for us is the size of the walkable catchment around the city centre zone. We believe it is prudent to keep this to 10 minutes for the time being.

We advocate a cautious 'least regrets' approach to introducing density in order to retain good portions of historic character, existing trees and green space, and to reduce infrastructure costs.

Some of these arguments will set the scene for points we will make in later hearings.

2. LIVE WELLington and density done well

LIVE WELLington is an organisation set up to support this generations and the generations of Wellingtonians to come to 'live well' in a city that is carefully designed, functional, attractive, and accommodating of all kinds of people.

We are citizens who value Wellington's liveability, access to nature and green spaces, strong communities, character, and diversity, and want to see this retained as the city develops and changes.

Carefully designing our future urban environment is a far better solution than removing all controls and letting developers do what they want. We support participatory design processes and strong civic leadership to drive rapid growth in good quality housing on under-utilised land throughout our city. We advocate for fixing the homes that need fixing now and ensuring new builds are well-designed and provide durable housing for the future. We prefer to see houses added rather than replaced.

We advocate 'density done well', encouraging density where it makes most sense, ensuring it is high quality and resilient, and that our suburbs are enhanced with high quality urban design and have the facilities they need nearby to support their sense of local identity.

We recognise that the city must undergo significant change in order to respond to climate change pressures and provide room for more people.

We believe that a deliberate approach is more likely to be successful than running roughshod over the character and quirks of the existing city. We advocate finding the right balance between rampant new development and retention of what is special, and ensuring the city is resilient.

LIVE WELLington was formed following the spatial plan consultation, when we recognised that a strong voice was needed for density done well. We have been closely involved in the District Plan process since that point.

We are made up of a core committee of around 10 people, and nearly 150 members and followers who have signed up via our website.

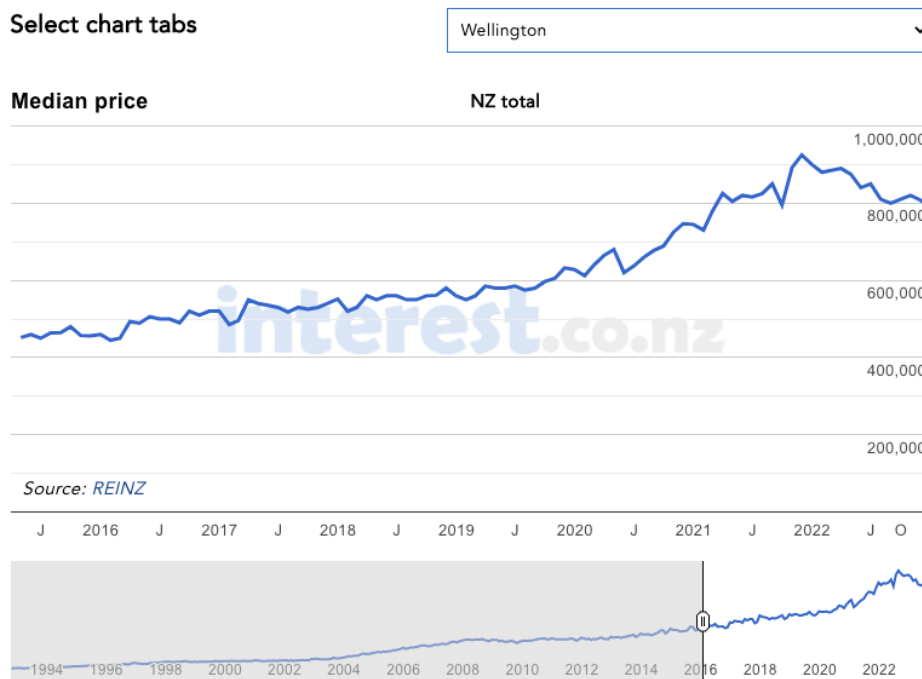
LIVE WELLington supports the following in the District Plan:

- High density development in central areas – this should be more targeted at specific areas
- Protection of Wellington's distinct history and character housing through heritage and character areas, which are qualifying matters under the NPS-UD
- Extension of current proposed character zones in order to retain more of Wellington's iconic and distinctive character houses
- Strong design guidance for new builds, particularly multi-unit development
- Retention and more development of open space and green areas for a growing population, particularly ensuring these are protected from unwanted shading
- A focus on the city's resilience as the climate changes, which includes retaining Wellington's tree canopy to help avoid flooding and overheating of the city

More information about us is available here: <https://www.livewellington.org/>

3. Some context about the District Plan

A district plan is a 10 year-plus document. But as humans we tend to respond to the here and now, and when the council first started the District Plan process with consultation on the Spatial Plan in 2020, Wellington was at the beginning of a housing bubble. House prices were growing steadily, to unheard-of heights, and there was strong agitation from groups of renters and young people to do something – anything – to address this. See the graph below:



REINZ – Median house prices for Wellington

Those priced out of the housing market looked for a villain and – adopting the approach of the YIMBY movement of the United States – started to identify character home protections as a key barrier to affordable housing.

Suddenly heritage and character houses were viewed with great suspicion and it became fashionable to deride them with some adopting extreme positions (for example, Councillor Tamatha Paul saying she would like to ‘get rid of all heritage’ on the 2022 campaign trail). The Government also responded to this movement, introducing the NPS-UD and MDRS – tools aimed at forcing densification and zeroing in on character and heritage protections.

And yet a year later, house prices in Wellington have dropped back significantly from their highs, despite the fact no changes have been made yet to character and heritage protections. What has changed is interest rates, and in hindsight it seems clear the main driver of the Wellington housing bubble was cheap finance.

That’s not to say it doesn’t make sense to look at increasing housing capacity – LIVE WELLington welcomes this – but a more modest approach is appropriate, recognising that character and heritage restrictions are but one piece of a complex jigsaw of levers that affect the housing market.

(We will provide more information about the case for character in our evidence for Hearing Stream 2.)

4. More capacity than we need

This submission is about striking a more appropriate balance around housing capacity provision, amenity, character and green spaces protection.

It is possible to move the dial, and still achieve the housing outcomes we want, because the proposed District Plan creates far more capacity than is actually required.

This most likely occurred because the city planners created a Spatial Plan that would accommodate the projected population growth, and then had to also accommodate the government's NPS-UD and MDRS changes which introduced further density – in other words, due to timing, Wellington city encountered a 'double-whammy' of capacity changes.

This fact of excess upzoning is outlined in the **Statement of evidence of Philip Mark Osborn** on behalf of Wellington City Council submitted as part of Hearing Stream 1.

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/statement-of-evidence-of-philip-osborne-on-behalf-of-wellington-city-council.pdf>

In summarising, Mr Osborn says:

'When considering all development factors associated with both the market and planning restriction the Wellington City PDP is estimated to facilitate approximately 50,000 dwellings, more than sufficient to meet the requirement of 35,928 new homes, both in quantum and typology.'

In fact, the plan theoretically enables more than **239,000** houses to be built, but this total potential is slowly whittled away as it is passed through filters from the theoretical (plan enabled), to feasible (commercially viable at 20% profit), to realisable (risk and market adjustment), and to demand reconciled (based on typology preferences).

Additionally, the number includes a buffer, as the actual projected long term demand over 30 year is 31,242. [p5].

No matter which way we look at it, the Plan creates far more capacity than is required over the next 30 years: **we have zoned for more than 139% of what is needed.**

Inner city suburbs focus

The modelling Mr Osborn refers to takes into account the impact of all the proposed District Plan changes, including the NPS-UD and MDRS.

A previous capacity report produced for the council was based on the existing operative District Plan.

This is the Housing and Business Land Capacity Assessment (HBA) for Wellington City Council published in May 2022, also by Philip Osborne of Property Economics.

<https://wrlc.org.nz/regional-housing-business-development-capacity-assessment-2022>

[See the Wellington chapter]

This report indicated that the operative District Plan as it is would not provide the housing capacity that Wellington is predicted to need: The report projected a demand for 36,621 houses in Wellington city in the period 2021-2051, and a capacity for 26,399, leaving a shortfall of 10,222.

But this report finds one zone DOES already have sufficient capacity under current rules: 'Inner city Wellington' – the area that comprises the inner city suburbs.

For Inner Wellington, demand was projected to be 3,140 and supply (capacity) 3,509, giving a surplus of capacity of 369. (see p53, and excerpt below).

(Within that is a mismatch of demand for terrace dwellings vs standalone houses or apartments, but the author points out the market could easily correct for that. p56.)

Table 2.21. Demand and capacity comparison by housing type and by housing catchment⁵⁶ 2021-2051.

	Demand	Capacity	+/-
North Wellington			
Stand-alone dwellings	6,090	6,401	311
Terrace dwellings	7,519	1,176	-6,343
Apartments	0	360	360
Total	13,609	7,937	-5,672
West Wellington			
Stand-alone dwellings	4,199	3,763	-436
Terrace dwellings	2,618	1,125	-1,493
Apartments	0	31	31
Total	6,817	4,919	-1,898
Inner Wellington			
Stand-alone dwellings	933	1,314	381
Terrace dwellings	2,207	47	-2,160
Apartments	0	2,148	2,148
Total	3,140	3,509	369
Central Wellington			
Stand-alone dwellings	243	141	-102
Terrace dwellings	0	57	57
Apartments	6,197	4,852	-1,345
Total	6,440	5,050	-1,390

In other words, according to this report, even if the planning rules for the inner city suburbs were not changed at all, these areas could accommodate all projected housing demand over the next 30 years.

5. The impact of ‘over up zoning’.

So the proposed District Plan more than fulfils its duty around supplying adequate housing for future projected needs.

Some would argue that if additional capacity is good, then even more capacity is better. But there are negatives from creating excess capacity. Trade offs are being made to create that capacity – below we set out the impacts of this excess capacity and what could be done to right the balance.

Dealing with climate change

The recent Auckland floods are a reminder that the changing climate will affect the resilience of cities in ways we are only just beginning to understand.

The need to build a city that factors in climate change is recognised by the District Plan's strategic objectives - but is this matched by the rules?

The proposed District Plan says that the city's built environment will support a net reduction in carbon emissions by 2050.

Much is made of the creation of a more compact urban form, to support better travel choices, but what is overlooked is that the fact that zealous upzoning will in fact encourage more emissions, by putting in place planning changes that will encourage the replacement of older houses by new ones. Additionally, there is a strong risk that greater intensification – in the absence of other safeguards – will diminish tree canopy and other green areas that soak up rain, provide shelter and shade, reduce heat and of course absorb and store carbon.

Adapting old buildings better than building new

Every time a building is removed and replaced, there is a significant impact on emissions. Old native timber that was bound within a house is then left to be burned or to rot in landfill, releasing emissions. The new construction will require new timber along with concrete, steel and other materials, all with a huge carbon footprint.

Sometimes this carbon footprint is balanced out by creating a more efficient building, or one that houses more people in a central area where they can avoid the use of a car.

That can true over time, but not in the short term, and it is the short term where we need to reduce emissions.

Internationally, there is a growing recognition and trend to favouring the retention and adaption of older buildings instead of building new – due to the environmental impact of new buildings.

https://www.theguardian.com/business/2022/apr/24/drive-for-net-zero-fuels-uk-boom-in-retrofitting-buildings-for-new-use?CMP=Share_iOSApp_Other

If we are serious about reducing emissions, particularly in the near future which scientists tell us is so crucial to getting climate change under control, we would be retaining existing buildings as much as possible.

Green spaces and tree canopy at risk

As the climate changes, we are likely to experience more rainfall, as warmer air holds more water. The impact of this was demonstrated in the recent Auckland floods, where the stormwater system was overwhelmed by water.

Following that, Professor James Renwick, Professor of Physical Geography at Victoria University told Radio New Zealand climate change is making storms 'wetter' and future rain events could be 'possibly unmanageable'.

Asked how to make cities more resilient, Professor Renwick responded that bigger drain holes and stormwater drains are needed urban design is also crucial. He said it's about:

“making sure we have green spaces amongst all the concrete and asphalt, [we need to make sure] we've got exposed streams, we've got wetlands, we've got trees planted, we've got a lot of the sort of natural environment in the city that helps to soak up the water.”

https://www.rnz.co.nz/audio/player?audio_id=2018875640

So is the proposed District Plan setting us up to cope well with future heavy rain events in Wellington?

In May last year the WCC adopted a Green Network Plan. [See the agenda and minutes of this meeting: <https://wellington.govt.nz/your-council/meetings/committees/disestablished-committees/planning-and-environment-committee/2022/05/12>]

The plan itself focused on the central city, noting that while Wellington is 30.6 per cent tree canopy, the central city is just 5.12 per cent – lower even than London, which is 18 per cent.

The press release at the time said the plan would be adopted into the District Planning process [<https://wellington.govt.nz/news-and-events/news-and-information/our-wellington/2022/05/green-network-plan>] however this does not seem to have occurred.

Perhaps due to timing, this plan did not offer guidance for the areas of Wellington previously known as suburbs but soon to become high density zones – the inner city suburbs of Thorndon, Aro Valley, Mount Victoria, Mount Cook and Newtown.

According to the report, around 33% of green space is on private land, and indeed, aerial maps of Wellington's inner city suburbs show greenery in many of their small backyards.

The transition of these suburbs into high density zones will inevitably result in the loss of those small backyards. This might be appropriate if total redevelopment of suburbs provided for green space in other ways, but this is not the approach being proposed.

Christchurch City Council has just released a draft 'Urban Forest Plan' to increase its tree canopy, recognising the need for trees to combat heat and absorb water and carbon.

<https://www.stuff.co.nz/the-press/news/131175634/slow-grow-christchurchs-urban-forest-will-take-decades-to-form>

This report from the so-called 'garden city' notes how hard it is to recover lost green space: it will take decades for Christchurch to achieve even modest percentage improvements even with extensive planting. Therefore, if green spaces are a priority for us in Wellington, we should be very miserly in giving up any green spaces at all.

LIVE WELLington therefore advocates for limits on densification where possible until this issue is addressed.

Random high rises

Creating capacity doesn't mean it will be built, but random high rises will occur. Instead of planning a new area of high density where amenity can be carefully considered, a larger area of growth brings the risk of 'random high rises' – creating shade and other issues for the surrounding low rise suburb. Much better to concentrate this growth in smaller areas and do it well.

Infrastructure needs to be in place first, before growth can occur

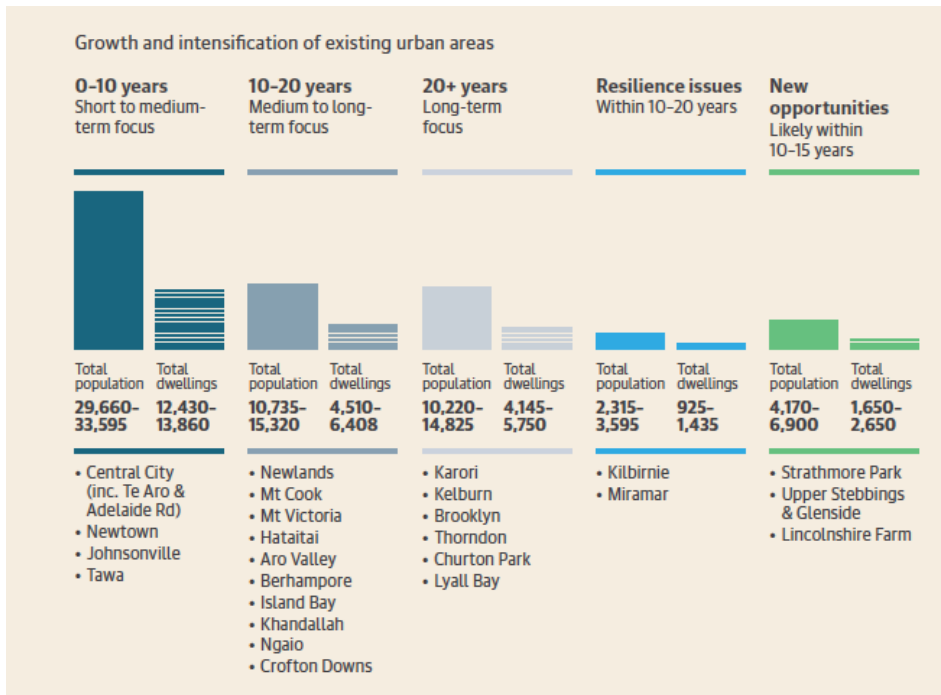
It is well known in Wellington that we are woefully underinvested in infrastructure. Our water pipes are bursting across the city, and Wellington Water cannot keep up with leaks.

The Spatial Plan outlined the challenge:

'the scale of infrastructure investment required to address current network issues and support growth over the next 30 years is substantial, especially for three waters and transport [...]

The size of this investment means it would be financially challenging to service all growth areas at once.'

In this document, the council sets out its ideal approach to an affordable staged investment in infrastructure:



P49 <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/full-spatial-plan.pdf>

From this diagram, it is clear that intensive development cannot occur in multiple places all at once. Indeed, for the first 10 years (the supposed lifespan of a district plan), only the central city area plus Newtown, Johnsonville and Tawa will have the infrastructure needed to support their development. A staged approach to growth is supported by LIVE WELLington, but unfortunately this careful planning is undone by the central government’s intensification rules which apparently don’t allow for staging.

It must be frustrating for the council, and it certainly will be for ratepayers and residents, who will face decades of haphazard development imposing additional costs and pressure.

Rather than plough on, it would be sensible to do what we can within the rules to focus development on these target areas first, and limit development on areas not supported by infrastructure investment.

Adelaide Road, for example, is widely seen as a ‘no-brainer’ area for development, being close to the central city, on a planned transport route, and currently occupied by low value light industry and commercial uses such as storage facilities and equipment hire sites.

LIVE WELLington advocates for using the tools available to limit development in areas that will be not supported by infrastructure investment over the next 10 years.

6. Righting the balance

As outlined above, there are potential perverse outcomes from over upzoning, such as the loss of green spaces, more emissions from building, and the additional cost of unplanned infrastructure investment.

Councils have limited ability to fix this, due to the imposition of the NPS-UD and MDRS rules set by Government.

But there are some tools available, including qualifying matters, and pertinent to this Hearing Stream, walkable catchments.

In hearing stream 2 we will argue for the value of character areas to Wellington and reason qualifying matters should be extended.

In this stream we argue that walkable catchments should be limited to 10 minutes from the central city.

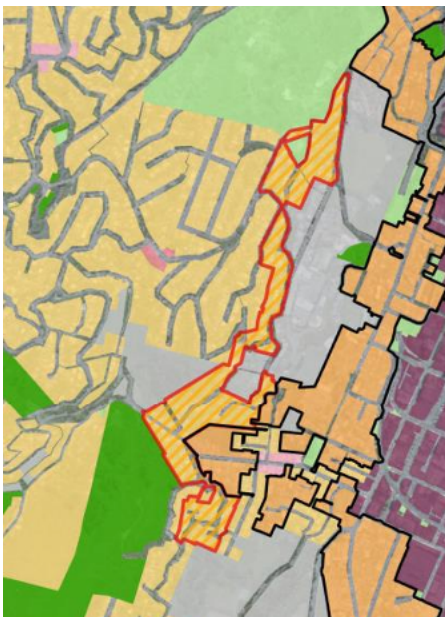
Walkable catchment in the city centre zone

It is perfectly possible to argue that 15 minutes is an appropriate distance to ask people to walk; many people living in the inner city suburbs would walk, cycle or scoot further than that each day to get to work or education.

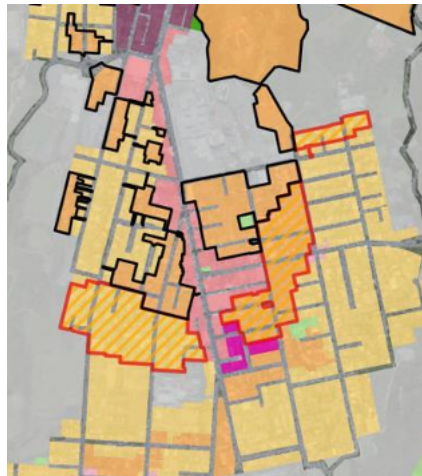
There are two reasons LIVE WELLington puts forward to choose the lesser distance of the two. First, is simply that the 'walkable catchment' is one of the few tools in the toolbox that can help limit high density – and as discussed above, there are a number of issues with allowing high density without proper safeguards:

The other, more practical point to make, is to do with what high density means for those residents affected.

Considering the map supplied by the WCC which indicates the difference between a 10 and 15 minute walkable catchment. We see that the three areas most affected by this decisions are Aro Valley, lower Kelburn and parts of Newtown/Berhampore.



Aro Valley and lower Kelburn



Newtown

[Reference: P 91. Hearing stream 1 – Section 42a Report – Part 1 plan wide matters and strategic direction

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/hearing-stream-1-section-42a-report-part-1-plan-wide-matters-and-strategic-direction.pdf>]

The effect of including these areas into the walkable catchment means they are in the high density zone, and implies that residents here can get by without cars (car parking will not have to be supplied for new developments).

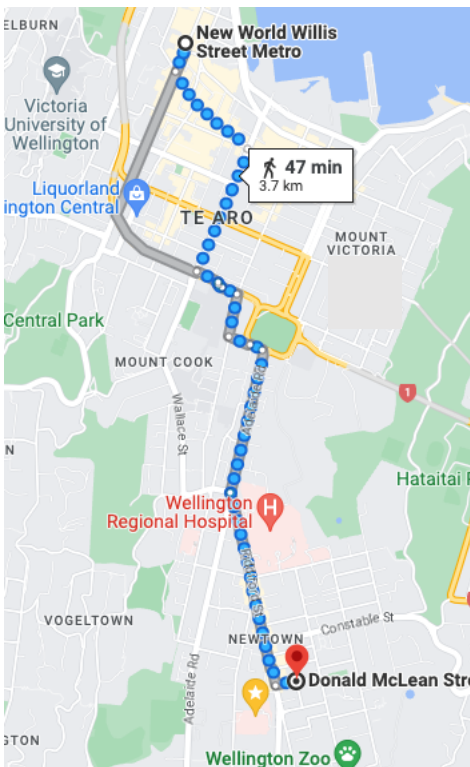
Aro Valley's topography, narrow streets and existing density mean parking is already very limited. For the lower Kelburn residents, the area in question is up hill, and therefore much more difficult to navigate as an older person, disabled or a parent with children trying to walk up and down.



Terrain map of lower Kelburn

For Newtown, the point is that while this area may be technically 15 minutes from the 'central city', in reality those residents are quite far from the real action of the city. For example, walking from Donald McLean Street in Newtown to the New World on Willis Street is a distance of 3.7km that would take 47 minutes according to Google maps.

For those located on this southern end of the central city, for those on hills, and for distant areas with limited parking, it makes more sense to apply a smaller walkable catchment distance.



7. Summary

Use the tools available to arrive at a more sensible outcome

Additional housing capacity is needed for Wellington, and is welcomed by LIVE WELLington.

However, due to a range of circumstances, this plan over-delivers on capacity.

There are risks in doing so – loss of green space, out-running the city’s ability to provide infrastructure, and loss of character housing that is part of the identity of Wellington.

For these reasons, LIVE WELLington urges the city to move more cautiously, and make use of the tools available (walkable catchments, qualifying matters) to limit that high density development to more closely resemble forecast demand.

We believe this strikes a better balance between competing interests, and provides a fairer outcome.

And ultimately it is a ‘least regrets’ approach, where we avoid losing some of the things we value and preserves the opportunity to do things differently in the future, should we wish to.