

# District Plan - Submission

Retaining Wellington's  
Character is possible



# Background

\* My Submission primarily relates to Mt Victoria & the removal of the pre-1930s non-demolition rule & proposed reduction in protection of character & heritage to just 38% of the existing protected area.

I am focused on Mt Victoria as I live there and it is probably the most iconic character suburb in Wellington ....but the logic of my arguments can be applied to other inner-city suburbs.

There is strong support from residents for the city's unique character & heritage. Character Precincts are vital to protect it

# Introduction

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The District Plan reduces Character protection in the inner suburbs including Mt Victoria to small pockets comprising approx. 2/3rds of the previously designated areas

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The key reasons put forward by WCC are that the Govt mandates this through the NPS-UD & MDRS & that high density development is required in these areas to meet “expected housing demand” over the next 30years.

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I will show there is already sufficient development capacity in the inner-city suburbs and there is strong expert evidence (Boffa Miskell) & widespread public support for expanding the character precincts from what’s proposed.

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Finally, adequate infrastructure should be the first priority when it comes to intensification & the current poor state of Wellington infrastructure & lack of a concrete plan to upgrade it are at odds with widespread densification...



# Decision Requested

- ❑ **Request** a decision to be made to increase the protection of Mt Victoria's Pre-1930s Character Precincts to 76% rather than the 38% proposed in the District Plan - based on the outcome of the Boffa Miskell Pre-1930s Character Area Review expert report in 2019.
- ❑ **Address** related WCC Strategic Objectives that have been used to justify/support the removal of the character/heritage protection to enable densification re:
  - ❖ Sufficient land capacity
  - ❖ Well functioning Infrastructure
- ❑ **I will talk** about the strong support for character & heritage in Hearing 2



## CHARACTER PRECINCTS - Boffa Miskell Character Area Review 2019

**Expert Evidence on Character - Boffa Miskell were commissioned by WCC to undertake a stocktake of the pre-1930 character areas including a review of the 'on the ground' character of the areas...It makes sense to retain areas not only of the Primary houses but also of the Contributory, as they both together create that sense of character – therefore these areas should qualify as a Qualifying Matter.**

- It should also be noted for the purposes of this review the term “character” was defined & confirmed by the WCC. The WCC used the same definition of Character in the “WCC Character Precincts - Residential Design Guide”

# Character Precincts – Boffa Miskell – Further Support

The council themselves backed the idea of expanding the character areas during the Spatial Plan stage (later voted down), not just because people asked for it, but based on a review of the evidence by Boffa Miskell.

- Council Officers recommended changes to the Spatial Plan in June'21 - "The Pre-1930 Character Area Review completed by Boffa Miskell Ltd (2019) was used as the basis for this further work....Our review work, cross referenced with submissions, has resulted in some additional sites being recommended for inclusion in 'Character Precincts' because of their consistent character value".



# Housing Capacity – The sky is the limit

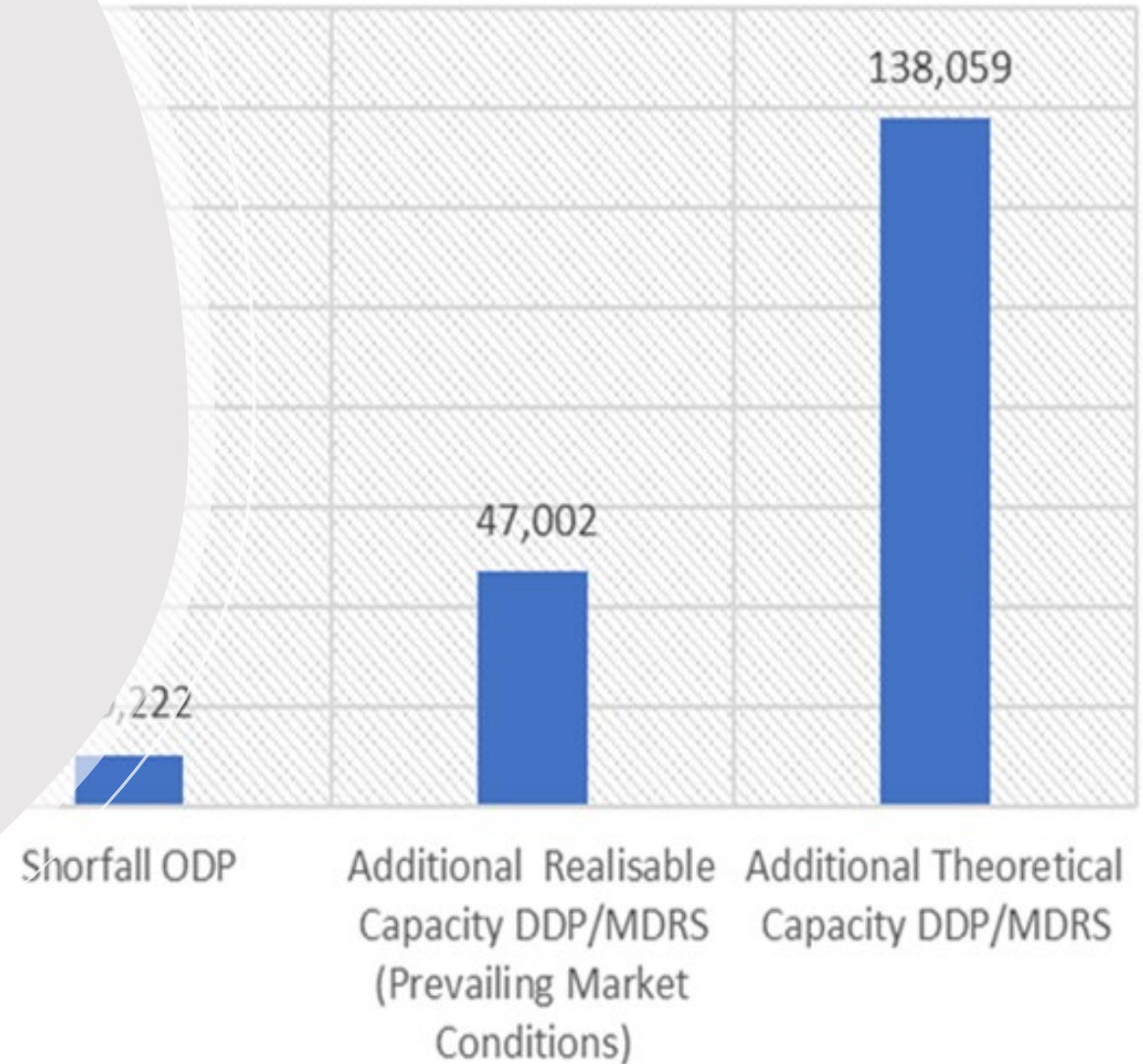
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- Stats NZ population growth projections of the next 30 years are around half those used by WCC
- Even the Council's higher population projections are no different from previous recent comparable periods & the population has been accommodated under the existing planning rules
- Using the WCC own figures:
  - Without enabling any further intensification ie under the NPS-UD & MDRS there is a **short-fall of just 341 houses across Wellington city each year**
  - Crucially there is **NO projected housing shortfall over the next 30 years in the Inner-city suburbs**
  - Yet the combined Draft District Plan & MDRS allow for a theoretical additional capacity of **138,059 houses** (that figure was actually revised down last year to take into account current economic condition)

# City - Housing Capacity Projections 51 Draft District Plan/MDRS

## Housing Capacity – Off the Charts!

While the realisable capacity (**allowing for commercial & realisable feasibility**) is a lower 47,002 houses enabling such a large amount of additional housing to meet a tiny short-fall of 341 houses per year (10,222 houses over 30 years) is not compatible with the WCC Strategic Objective of enabling “**sufficient land development**”. Clearly its way more than sufficient & risks (amongst over things) the unnecessary destruction of Wellington’s character & heritage.





# Infrastructure & Intensification—where do we start?

**WCC Strategic Objectives incl. SCA-01 (4)** – Requires future growth & development to be enabled & sufficiently serviced & **NPS-UD** – Requires adequately development infrastructure to support the development of housing

- **Given the current poor state of 3 waters infrastructure & the lack of a concrete plan, allocated funding & timeframe – inadequate infrastructure must be considered a Qualifying matter that fails to meet the above Strategic Objective & NPS requirements**
- **Auckland Floods** – “If we have that density we need to have the infrastructure” ...*Dr Karamia Muller lecturer of architecture University of Auckland Nine to Noon 30 Jan’23*
- **Cyclone Gabrielle—** “...So we're gonna have to look very closely at how we make sure we've got as resilient infrastructure as possible” - : *Prime Minister Chirs Hipkins – Newshub’23 Feb*
- **Infrastructure Cost** – Assessed by Wgtn Water 3 waters upgrade costs per new dwelling in Mt Victoria > \$200,000 while Thorndon comes in over \$500,000 per dwelling

**Simply should not build high density without enough infrastructure capacity,,adequate infrastructure must be made is the first priority in development**

# Changes in Market Conditions & Infrastructure Constraints Justify Excess Capacity?

**Inadequate infrastructure has actually been used by WCC to justify over capacity...** this is putting the cart before the horse...

## The way it should be done:

- I. Complete a full infrastructure assessment
- II. Devise a concrete infrastructure upgrade plan including contingencies, allocate funding and commit to a timeframe
- iii. Create a housing intensification plan

**Creating over capacity** - risks (amongst over things) the unnecessary destruction of Wellington's character & heritage.

# Final Word....

An enormous up-zoning has been created in the District Plan, well beyond likely demand which will result in developer's cherry picking the most profitable sites which are unlikely result in affordable housing.

By creating a large area of potential building sites which will need dispersed infrastructure, both costly and likely to take many years. AND at the expense of risking the city's character & heritage that is recognisably Wellingtonian being blighted and sadly it will all be for no good reason...