



Submission to the Proposed District Plan Hearings stream 4 – Centres. June 2023.

Presented on behalf of the Newtown Residents' Association by the President, Rhona Carson.

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 in favour of increasing housing and housing density, and we are also in favour of careful planning about where well-designed multi unit developments are best situated. We support the proposal that high-quality multi-use developments in Riddiford Street would bring vibrancy and opportunities with trade, commerce, hospitality and entertainment at street level and apartments above.

In this submission we are addressing the designation of Local Centre Zone for Newtown, and its consequences. We will also comment on the zoning of Adelaide Road, the City Outcomes Contributions and Wind Standards.

Local Centre Zone

We agree with this categorisation for Newtown, but what follows outlines our objection to some of the increased heights the S42A report writer recommends for within the LCZ: we agree with 18m to allow for development behind the historic shops, but object to increasing heights in the rest of the zone to 27m. We also object to the PDP zoning several streets in the south of Newtown for 21m, in spite of being outside the walkable catchment to the central city, because they are adjacent to the Local Centre. We would like this to be reconsidered, as again we believe this zoning is unnecessary and would have negative consequences.

Central to all the arguments for extending the extent of upzoning and increasing permitted heights is the belief that “more is better” in terms of achieving NPS-UD growth targets. The WCC Planners who developed the plan and the various submitters who have asked for permitted heights to be increased all talk as though the designations and permissions in the District Plan will automatically lead to more homes being built - and that those homes will be affordable. This is also a fundamental belief written into the NPS-UD. We have always been sceptical about this, and now this scepticism is echoed in the expert evidence provided by Tim Helm.

Newtown's position in the hierarchy of Centres

The Proposed District Plan states that the “Local Centre Zone meets the needs of communities, businesses and residents in the surrounding residential catchment and neighbouring suburbs in a manner that supports the City's compact urban growth objectives and its role and function in the City's hierarchy of centres.”

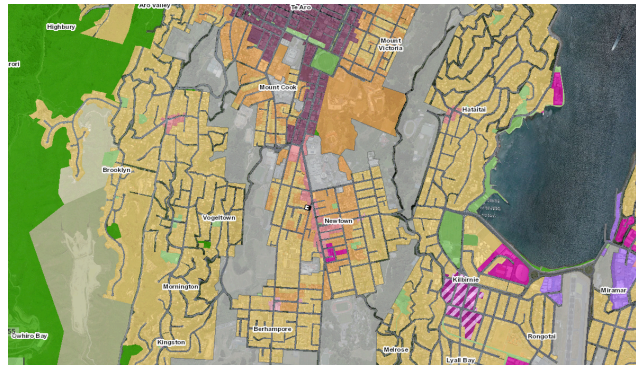
We agree that Local Centre is appropriate for Newtown in a hierarchy of City Centre, Metropolitan Centre, Local Centre and Neighbourhood Centre. We note that Kāinga Ora has said that there is a missing category of Town Centre, and has proposed that this be added, with Newtown, Tawa and Miramar being re-categorised as Town Centres. Kāinga Ora's interest in the Town Centre designation is the assumption that a designation higher in the hierarchy would justify increasing the extent of the zone and increasing the heights in Newtown to 36m.

We agree with the WCC report writer's reasons for rejecting this submission, they are all entirely reasonable and sensible. However the writer then goes on to make a concession to the Kāinga Ora position:

“As an alternative to lowering the heights in the smaller centres, the height limit applied to larger centres could be increased. In particular, I consider that these two centres lend themselves to additional height. Noting my assertion at paragraph 108 of the Overview and General Matters section of this report that there is no difference in terms of the activities enabled within Kāinga Ora's proposed TCZ and the LCZ as notified, I consider that this change would address their concerns with respect to enabling intensification in these centres.”

Kāinga Ora complain that the WCC definition of a Local Centre conflates the definitions of Local Centre- meets the needs of the surrounding residential catchment, and Town Centre - meets the needs of surrounding suburbs. If these were separated it would be more obvious that Newtown is truly a Local Centre not a Town Centre, because it doesn't significantly service neighbouring suburbs – neighbour Kilbirnie in particular is a metropolitan centre, which services Newtown rather than vice versa.

Something that is missing from all the analysis is an understanding of where Newtown sits among the surrounding suburbs, and how close together they all are. (Slides)

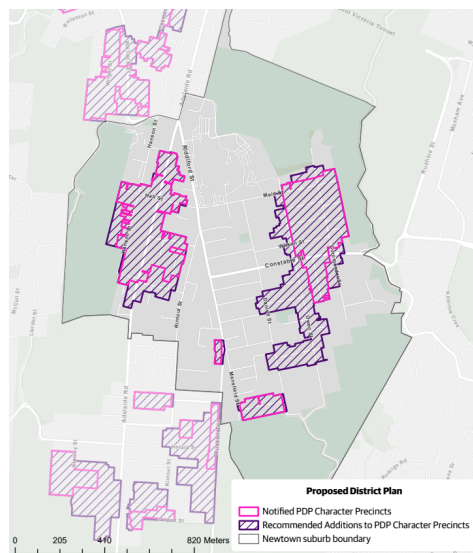
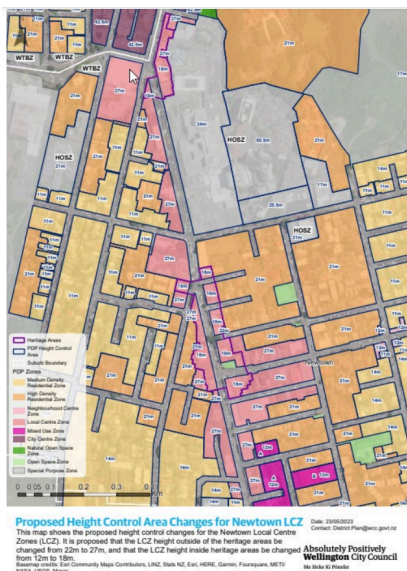


Look at our surrounding suburbs - we have the City Centre Zone to the north, and Kilbirnie, a metropolitan centre, close by on the east. Island Bay to the south has its own local centre.

We submit that the level of services in Newtown, particularly commercial services, has been exaggerated, and they don't justify Newtown being regarded in a similar light to a Town Centre or Metropolitan centre. The LCZ is quite extensive as it runs along the length of Riddiford St, but for the most part it is only one building deep, and in any case the size of the area doesn't in itself result in a comprehensive range of services. Newtown has no banks and the only major retailers are the supermarkets and pharmacy. We do have good community services that meet local needs, but many of them are built around the needs of low-income residents so they are unlikely to be an incentive for increased development, which these residents won't be able to afford. Other services such as the Library and Community Centre are duplicated in Island Bay, Kilbirnie and Miramar. For the most part, Newtown only meets the needs of our own residential catchment, and that only partially. The idea that Newtown services other suburbs might be because Newtown draws people in to the hospitality venues, often with live music, and to other niche enterprises such as ethnic stores, or the weekly market at Newtown School. In other respects, Newtown businesses don't provide anything close to the range of services that are available in Kilbirnie, and people in Newtown and surrounding areas go there or into the city for a lot of services.

Concerns about building heights, both in the notified PDP and in the recommended amendments.

(Slides)



NPS-UD Policy 3d, enables: “within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.” This is being used as a reason to add increased heights in the Newtown Local Centre Zone and to increase the extent of the HRZ around it. We note that there are no prescribed criteria for determining the relationship between a level of services and building heights and density.

The properties which are recommended to have a 27m permitted height in this map are all 22m in the PDP. We see no benefit and a lot of problems associated with this extra height. There is ample evidence that the PDP, even without any increased heights, enables far more realisable capacity than will ever be needed in any of the future population estimates, and so we are asking for this recommendation to be declined, and for the HRZ around Newtown to be rezoned MRZ to the extent that that the NPS-UD allows. The WCC recommendation to extend the character precincts is appreciated, and we hope that the Commissioners approve this and ideally increase the precincts further. A number of submissions in stream 2 and 3 asked for increased recognition of the character and historic nature of the streets around the Newtown Centre and we hope that this will be agreed.

Our belief, which we have been repeating in all the submissions we have made on the various stages of the plan, is that when a wide area is upzoned there won't be any more developments built but they will be scattered among the existing homes. Developers will be able to pick and choose sites to develop, with no coherent planning of the area as a whole. 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.

The Planners and submitters such as Kāinga Ora keep repeating the phrase ‘well functioning urban environment’ as if zoning for potential extra development is all that is needed to create such an environment. They also emphasise that a component of a well functioning urban environment is that it enables a variety of homes that meet the needs, in terms of type, price, and location, of different households. We agree with this. Newtown already has a variety of housing types and our vision for higher rise development along the commercial streets would see this increase. However widespread 21m upzoning diminishes the choice of housing type rather than improving it. Sunny homes and gardens, a characteristic of Newtown, would no longer be guaranteed because even where they still remain they would risk being affected by shading, and increased wind turbulence.

The Wellington City Council Housing and Business Capacity Assessment (HBA) concluded that the majority of the unmet demand for housing was for terraced housing, not for apartments. This makes us question the emphasis on widespread zoning for 21m. This is primarily suitable for apartments, and having the HRZ zoning in place is likely to make these areas less attractive for developers intending to build terraced housing, perhaps of three stories. The risk of being overshadowed by a building of twice the height would be too great.

Concentrating higher development within the Local Centre and along Adelaide Rd, moving towards the City, is most appropriate for achieving ‘density done well’. Reducing the extent of HRZ outside these areas is limited by the requirements of the NPS-UD, but we submit that reducing the extent of walkable catchments and maximising the use of qualifying matters of character and heritage would support higher rise development in the most suitable areas and increase the potential for medium density development elsewhere. This would promote a ‘well-functioning urban environment’ more effectively than scattered out-of-scale developments across a large part of residential Newtown.

The zoning of Adelaide Road

In the PDP Adelaide Rd, from the Basin Reserve to John St, has been zoned as City Centre. This purpose of this seems to be a mechanism for increasing the permitted heights in this area. We agree with the submissions from LIVE Wellington and from Hilary Watson that this is inappropriate.

To quote from the LIVE Wellington submission, “As the 2008 framework explains, Adelaide Road is ‘an urban community on the edge of the CBD’ and this still holds true: on the edge, but not part of the CBD.”

We support the request for Adelaide Rd to be zoned for Mixed Use, MUZ – this exactly describes what is best suited for this street.

A consequence of zoning Adelaide Rd CCZ is that the ‘walkable catchment’ that results in HRZ across much of Newtown is measured from the John St intersection. We responded to this in our submission to Stream 1, noting that this is a long way from the CBD, and it is at least another 30min walk from the boundary to get to any of the services associated with a city centre. This negates the supposed justification for having a walkable catchment, and ideally this would be removed.

City Outcome Contributions

A number of submitters, from diverse viewpoints ranging from Kāinga Ora to LIVE Wellington and Wellington’s Character Charitable Trust, have objected to City Outcome Contributions being triggered by applications for over or under height developments. The common thread is that these applications should be assessed on the merits of the development and the effects of the proposed heights, and that all development should be encouraged to provide for the outcomes contained within the policy.

We agree with the evidence provided by Stuart Niven for Wellington’s Character Charitable Trust, and support the recommendations in paragraph 69 of his submission:

“.. I would strongly recommend that the PDP take two coordinated steps:

- (a) Remove the arbitrarily located, and potentially confusing, City Outcomes Contribution measure from the Plan; and
- (b) Ensure a robust and comprehensive set of city design rules and related urban design guidance measures are firmly in place, including height limits (beyond which the effects associated with the height exceedance are assessed) and the special assessment measure of a credible and experienced Urban Design Panel.”

Wind Control

This chapter of the PDP starts off: The purpose of the Wind Chapter is to manage new developments, additions and alterations so as to maintain or enhance comfortable and safe wind conditions for pedestrians and public space users. The management of building design for wind effects provides environmental benefits for people and communities.

We agree with this as far as it goes, but we note that it specifies ‘comfortable and safe wind conditions for pedestrians and public space users’ but doesn’t mention the effects of wind on neighbouring properties. We submit that this should also be assessed and considered when a development is applying for resource consent.

We support WIND R1-2, which applies to Local Centres, in which an activity is permitted when

- a. New or altered buildings or structures are less than or equal to 12m in height above ground level; or
- b. Additions are less than or equal to 4m in height when measured from the highest point of the building or structure; or
- c. Rooftop additions are setback at least 3m from the building facades adjacent to public spaces and are less than 33% of the existing building volume; or
- d. Compliance with the following standards is achieved:
 - i. WIND-S1; and
 - ii. WIND-S2.

However we would like to see the standards WIND-S1 and WIND-S2 strengthened to include the effects of wind on private spaces as well as public spaces, and we note that the assessments are focussing on wind conditions that are dangerous to pedestrians. The requirement to maintain or enhance comfortable as well as safe wind conditions seems to have been lost.

Thank you for the opportunity to make this submission.

Rhona Carson
President
Newtown Residents' Association.

June 20th 2023.