15 May 2019

The Wellington City Council
Planning for Growth
Wellington
Planningforgrowth@wcc.govt.nz

1. Historic Places Wellington is a registered charity promoting the identification, protection and conservation of historic places and aims to inform, advise and educate the public of their significance. We wish to make the following submission in relation to the Planning for Growth consultation being conducted by the Wellington City Council (WCC).

Process

2. We note the 2016 National Policy Statement on Urban Development Capacity (NPS-UDC) issued under the Resource Management Act by the previous National-led Government. We acknowledge that NPC-UDC requires high growth Councils to provide sufficient “development opportunities” to house projected population growth. This is an important context for WCC planning.

3. WCC has an existing growth strategy “Wellington Urban Growth Plan 2014-2043”. It plans for a population growth of up to 50,000 people by 2043. That strategy focuses on intensification in low to medium density areas as well as intensification in the central city and a northern growth corridor. The Wellington Urban Growth Plan recognises the need to “keep the city compact, walkable, and supported by an efficient transport network”. HPW supports the Wellington Urban Growth Plan 2014-2043.

4. HPW considers the Wellington Urban Growth Plan 2014-2043 is sufficient to meet the requirements of NPS-UDC. The development capacity exists notwithstanding that except in
the northern corridor, developers may have otherwise been slow to take up the development opportunities provided therein.

5. WCC is obliged under NPS-UDC to obtain evidence in the form of Housing & Business Capacity Assessment (PB1); Market Indicators (PB6); and Price Efficiency Indicators (PB7). HPW seeks information about plans to obtain these reports, or copies of input documents if they already exist.

6. The Planning for Growth documents propose four “Scenarios”. HPW rejects the presentation of those mutually exclusive options. They do not appear to be a useful tool to gather evidence to comply with NPS-UDC. Similarly, the use of an on-line survey tool asking “trade-off” type questions is not a particularly helpful contributor to evidence based policy formulation. HPW does however support the opportunity for public input to this policy debate.

Character Areas

7. HPW’s main concern is to ensure that the WCC Planning for Growth process has no bias toward reducing the existing protections for Wellington’s character areas. Reducing existing protection is a component of two of the “Scenarios”. These areas help “define” the image of Wellington and also help show our history. They add to Wellington’s heritage and help make Wellington worth living in.

8. The existing protections in the District Plan have ensured that the nature of the character areas remains essentially consistent with their external heritage values while allowing modernisation internally. HPW specifically supports the existing provisions, in particular Rule 5.3.6 which requires resource consent for demolition of pre-1930 structures in character areas. In fact HPW believes that the provisions should be strengthened, for example the Council could consider ways it could pressure or incentivise owners to repair deteriorating pre-1930 structures, especially ones included in the heritage schedule.

9. HPW is concerned that WCC does not allocate heritage staff resources to make significant input to planning issues relating to character area protection. The main rationale for character areas is their clear heritage value. It makes no sense for WCC to make a distinction between considering issues relating to individual heritage listed structures and considerations relating to older houses in a character area. The absence of heritage staff input to character area issues should be remedied in order to comply with the heritage provisions of the Resource Management Act.

10. Nonetheless, HPW would support good quality modern developments within character areas but which do not necessarily require demolition of pre-1930s structures, while retaining Rule 5.3.6. We are not opposed to intensification per se - this where the “Scenarios” do not allow for nuanced discussion.

11. HPW notes that in the Boffa Miskell stocktake reports that about 80% of the character area housing is original pre-1930s housing. This is to be celebrated and the existing protections for character areas maintained, in particular Rule 5.3.6.

Population Growth
12. There needs to be collaboration between Hutt City, Porirua City, Kapiti Coast and WCC about this planning. Historically those cities substantially provided the “development opportunities” for Wellington’s population growth. There are good transport links to those areas, and increased opportunity for growth in them.

13. HPW believes that growth will inevitably shift north to Kapiti (for reasons including the new expressway, aging population, and potentially cheaper housing) and queries the estimation that Wellington’s population will in fact increase by 80,000 people. WCC needs to undertake evidence based assessment of population trends and make informed input to Statistics NZ projections which NPS-UDC requires WCC to take account of. Recent reductions in immigration policy targets also need to be taken account of.

Summary

14. HPW opposes any reduction in character area protection and in particular objects to elimination of Rule 5.3.6 which has been largely successful in protecting character areas in the past two decades.

Yours sincerely

Felicity Wong
(Chair, Historic Places Wellington)