

# MT COOK! MOBILISED

MT COOK MOBILISED  
Box 9724 Wtn 6141  
mtcookmobilised@gmail.com



## **Submission from Mt Cook Mobilised on Wellington City Council (WCC) “Our City Tomorrow: Planning for Growth” Scenarios**

### **Introduction:**

Mt Cook Mobilised (MCM) represents the interests of residents and businesses in the Mt Cook suburb, covering about 5000 people. Residents include those living in social housing, students and other tenants in privately-owned properties, and owners in their own houses. There are numerous small businesses along the Adelaide Rd and Webb St precincts.

Significant parts of Mt Cook are currently designated as “character area” under the WCC District Plan (see the “Pre-1930 Character Area Review” by Boffa Miskell), and the suburb is described as already having a high residential population density.

### **MCM Views on Scenario Proposals:**

1. MCM supports the wider vision of Wellington City being a compact, green, resilient, vibrant and prosperous city with minimal carbon footprint and with fewer cars and better walking and cycling facilities. But we do have concerns with aspects of the scenarios put forward for this consultation on how to accommodate future population growth in Wellington.
2. Wellington City’s “character areas” in its inner suburbs add spark and vitality to Wellington’s overall attractiveness, and are a critical element in maintaining the human interactions that help sustain these suburbs. The concentrations of 19<sup>th</sup> and early 20<sup>th</sup> century housing in these suburbs are a unique feature of Wellington, and the current protection of these pre-1930 buildings in the District Plan by restricting their demolition should be maintained and indeed strengthened.
3. According to the population distribution figures in the Council’s Planning for Growth material, the proposals to reduce character protection in Scenarios 1 (full removal of character protection) and 2 (less character protection – nature of reduction is not specified) in fact do little to help accommodate the extra population forecast for Wellington during the next 30 years. Even full removal of character protection only allows an extra 3600 people to be housed in the inner suburbs when compared with Scenarios 3 and 4 which maintain the existing character protection. This 3600 is less than 5 % of the total extra population (80,000) expected under the higher growth forecast in the Planning for Growth document. This tiny gain is not worth it, if it means losing the economic, social and cultural benefits of the current character area protection.
4. There are particular areas within Mt Cook which may warrant special consideration. In fact one significant character area, around Nairn and Thompson Streets (which includes the Nairn St Colonial Cottage) is not one of the current Mt Cook “character areas” at all, and should be added. Similarly the small character precinct around Myrtle Crescent and Tasman, Tainui and Ranfurly Streets, which is separated from the larger Mt Cook “character area” by Massey University and Wellington High School, contains some high quality houses

and is at particular risk from development along the Adelaide Rd spine and possible mass transit developments. It is important that the present requirement for a graduated reduction in the permissible height of buildings at the boundary between the Adelaide Rd precinct and this character area is kept.

5. In the larger Mt Cook “character area” there are particular clusters of housing (eg groups of “workers’ cottages”, or the “sisters” in Wright St) that warrant ongoing protection even if the current area of protection is reduced. If the Council is seriously considering reducing character area protection by either reducing the areas covered by protection or making demolition easier (and in our view it should not), careful consideration should be given to a finer-grained approach which could see ongoing protection for important areas.
6. The existing protection regime actually needs to be strengthened, and particularly so if the areas to which it applies are more limited (and as noted MCM does not support any such reduction in character area coverage). This could be done by adding to the existing “no demolition” rule requirements which place sensible constraints on additional buildings on existing sites with pre-1930 houses, and on inappropriate additions to them. This would still enable the internal conversion of larger under-utilized properties into flats, to make better use of “big houses”, without affecting the external appearance of the property. This approach might enable some increase in inner city suburbs population without loss of the character quality of those areas.
7. Other potential enhancements to the District Plan provisions affecting character areas include strengthening the rules so that new or adjacent building height limits and recession planes cannot be exceeded other than in truly exceptional circumstances, stronger requirements for graduated or step-down rules where new higher buildings are adjacent to existing pre-1930 properties, and consideration whether consent should be required if new building proposals cause loss of existing sunlight and view lines. These constraints should not be eased in any future review of the District Plan.
8. Also, the actual administration of protection in future needs to be strengthened, so that resource consent exemptions from the District Plan in character areas are not so easily gained, and that where such applications are made, there is greater willingness to decide in favour of limited notification. In addition, the Council could consider strengthening its processes so that more pressure to repair deteriorating pre-1930 buildings can be placed on reluctant owners.
9. The Council should publish more detailed information on the categories and extent of exemptions granted by way of resource consents to improve its transparency and accountability, rather than just releasing the aggregate numbers of consents as shown in the Council’s annual reports.
10. There is no clear and quantified commitment, as an offset to greater population density, to improve the quality of life in the central business district (CBD) and inner suburbs by providing or requiring the provision of green space (an example might be a specified area of green park or parks should be required for every (say) 1,000 people living within a square kilometre), or to provide other measures and facilities to mitigate the health and other effects of smaller dwellings and minimal outside private space.
11. There is a specific error relating to Mt Cook in the Boffa Miskell report on Pre-1930 Character Areas. At page 21 (PDF version) in para (b) it says that an area on the Eastern boundary of the Mt Cook character area (it is in fact the Western boundary), is “neutral or detractive” because of more modern apartments. This area is described as the whole precinct between Papawai Tce and Salisbury Tce, excluding houses on the Wright St frontage. In fact the southern half of that area does not contain apartments, but is generally pre-1930 housing, largely accessed by rights of way from Wright St. This error is repeated in the map on page 63 of that report.
12. As a general conclusion, MCM does not support Scenarios 1 and 2 if this means any reduction in character area protection. While sympathising with the need to intensify the density of housing to reduce the impact of climate change and enable people to find affordable accommodation, the increase in inner city population resulting from the proposals in these two scenarios for the removal or reduction of character area protection appears to be small. This small gain does not offset the significant downsides of the proposals.

## General Points:

13. The Scenario proposals put forward for comment are difficult to respond to, have very little quantitative analysis on which to focus comments about them, and are indeed one dimensional and frustrating. They focus only on the location of housing to accommodate future population growth. There is no integrated overall vision on how to manage Wellington's growth on which to comment. The scenarios ignore many other dimensions that need to be brought into the picture, and even with advice that these aspects will be brought in at later stages in the planning process, this frustration remains.
14. For example, one of the main drivers for location of future housing – much more so than any changes to the District Plan - is certain to be the outcome of the Get Welly Moving transport proposals. The Indicative Plan for the future of transport in Wellington, which is preliminary, has only just become public information and is very broad brush. But there is obvious likely demand for more housing in suburbs east of the Mt Victoria/Mt Albert ridge if a second road tunnel and mass transit to the airport proceed, even allowing for the hazards in the Kilbirnie/Rongotai/Miramar areas.
15. There is also a risk of repeating past mistakes that occurred with the inner city motorway development if there is ongoing uncertainty about future mass transit routes, or locations are designated as being required for future transport corridor requirements and then that development does not happen for some years. Stagnation and deterioration, rather than growth, is likely to result.
16. Similarly the First to Zero paper (Te Atakura – Zero Carbon) is a list of worthy options to reduce emissions, many of which may affect future housing location, but in that paper there is neither an adequate picture of optimal strategies nor any good quantification of what any of the listed options may achieve. Does First to Zero take into account the emissions effect of an extra 80,000 people?
17. The emerging difficulties about insurance cover and costs in Wellington, and the costs of earthquake strengthening for existing and new housing in hazardous areas like the CBD, could also have a major impact on demand for future housing in Wellington, and its location.
18. There may be other strategies which could be adopted to influence the size of future population growth and the location of housing for it. Rather than taking the current extrapolations of population growth as a given, will the planning process examine the costs and benefits of ways to constrain the future growth in population? Similarly, a substantive review of the District Plan should look at the prospects for positive rules and broader encouragement to move jobs to where people live, rather than the implicit assumption that jobs will inevitably be in the CBD and that therefore people should live close to the central city – if more jobs can be located in suburban centres and more widely, this would also reduce transport requirements and emissions.
19. The Planning for Growth papers note the risks of having both residential accommodation and businesses/jobs in the CBD, given the likely impact there from climate change and earthquakes. Yet the scenarios place much emphasis on providing accommodation in or near the CBD, to help minimise transport costs and emissions. The planning process needs to be much clearer about the trade-offs among the various climate change and earthquake risks, and thus enable a better judgment about where both jobs and housing are likely to be located.
20. Similarly, the absence of any regional perspective beyond the Wellington City boundaries means that an important dimension is absent from this planning exercise. While again we are told that this will be factored in later, it is not clear when there will be an opportunity for consultation on these wider dimensions before a final "Spatial Plan" is tabled in November 2019.
21. The Planning for Growth documents (eg Te Atakura – Zero Carbon at page 27, and page 24 of the Issues and Opportunities report) suggest that because Wellington has the lowest carbon emissions per person of any

NZ city and that people in the CBD have the lowest emissions within Wellington, it is better for climate change overall if people come and live here, particularly in the CBD. This is a logical flaw – additional people will almost certainly not have the same emissions impact as the historical average of the people already in Wellington. New arrivals, at least initially, will almost certainly create higher emissions than the present average for existing residents, due to extra infrastructure, building and transport requirements. For the assertions in the reports to be valid, one would need to know the comparative marginal emissions impact of extra people, in both Wellington and other cities, and within the different parts of Wellington.

22. It would have helped if there had been a fifth baseline scenario, showing the location of housing if existing District Plan rules are continued. Page 3 of the Issues and Opportunities Report asserts there will be an overall shortfall of 15,000 homes in Wellington if current rules continue, but there is no analysis to support this. It is therefore not clear how all four scenarios can accommodate the missing 15,000 homes, simply by limited changes to the District Plan. Other than perhaps the change in Scenario 3 that allows major growth in Ohariu, the small differences in the location of housing as between the four scenarios suggests that planning for housing growth by focusing on District Plan changes may not be an adequate approach for Wellington.

### **Conclusion:**

Mt Cook Mobilised does not support Scenarios 1 and 2 if they require the removal or a reduction in the protection given to “character areas” in the current District Plan in Wellington. The gain in housing available in the inner city suburbs from such changes is so small in these scenarios that it is outweighed by the loss of social, cultural and economic benefits of the current protection.

In fact the current “character area” protection should be strengthened by adding rules and process changes that reduce the nature and number of exemptions to District Plan rules currently given by way of resource consents in these areas.

Rather than just focusing on possible District Plan changes and their effect on future housing location, a much wider perspective that brings together all the factors and policies that may shape future growth in Wellington is needed. There should be an opportunity for good public consultation and debate on this integrated picture, before a final spatial plan is prepared.

Thank you for the opportunity to make this submission. We would welcome the opportunity to discuss this further with WCC Councillors and Officers.

### **Mt Cook Mobilised**

Carol Comber (MCM co-ordinator)  
Dave Smyth

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