



3 October 2020

Mt Cook Mobilised (MCM)

Submission on Wellington City Council's Draft Spatial Plan Proposals

MCM represents residents and businesses in Mt Cook. About 6800 people live in our suburb. Much of the suburb currently has "character protection" (need resource consent to demolish a pre-1930 building) and a height limit of 3 storeys for new buildings. Mt Cook is already a high population density suburb, and one of the fastest growing outside the Central Business District (CBD).

We strongly oppose the removal of the existing character protection from more than half the currently protected area in Mt Cook. This would result from ending the constraint on demolition of pre-1930 housing and increasing the height restriction, as proposed in the Draft Spatial Plan (DSP). We regard the proposal to retain vague general character controls on new developments in the parts of Mt Cook outside the remaining full protection sub-areas as effectively meaningless.

Our submission focuses on these issues, and on the need for appropriate transition zones between the extended CBD zone (6+ storeys) and the Mt Cook character areas.

Other than passing references this submission does not deal with character protection for specific areas (eg, Nairn, Thompson and upper Hankey Streets), small groups of houses (eg, the need to keep full character protection for Myrtle Cres, Hargreaves St and parts of Rolleston St), or individual properties that warrant specific character or heritage protection. There is widespread support among Mt Cook residents for these areas to get or retain full protection. These more specific issues are covered in individual submissions by Mt Cook residents.

Part 1: Character Protection

Character protection is valuable to Wellington as a whole, economically and socially, as well as to the people living in inner suburbs. The maintenance of this long-established urban environment

creates and accommodates a sense of community and diversity that sits at the heart of what makes Wellington a great place to live. The proposals in the DSP risk destroying this.

The DSP argues that changes to character protection and maximum heights are needed to enable the development of housing for future population growth. This argument is flawed. The changes will not achieve the objectives of the DSP and the National Policy Statement on Urban Development (NPS). And if the proposed changes go ahead, it would take only three decades to wreck 150 years of history.

Excessive growth forecasts

The calculations of the number of dwellings needed in the inner suburbs made in the "Wellington Regional Housing and Business Development Capacity Assessment" (the Capacity Assessment) suggest total demand for these six suburbs will amount to between 4,100 and 5,400 dwellings over the 30 years to 2047.

The population forecasts underlying the dwelling projections used in the DSP are inflated as required under the NPS at paragraph 3.22, with the two supporting population projections being a high growth scenario and a medium forecast which then had a 15% loading added. The argument in the NPS for using higher growth forecasts is that it will ensure "choice and competitiveness" in the available housing. This argument is nonsense, as explained in the next section.

The authors of the Capacity Assessment themselves say that the actual demand for housing will revert to the medium forecast (the most likely actual growth rate) before the 15% loading is added. Using this forecast (without the 15% increase) implies a real need for about 3700 dwellings in the inner suburbs over the next 30 years.

Further, the Capacity Assessment also states that about 2500 dwellings will be built anyway by 2047 in the inner suburbs under the existing District Plan rules. So the real requirement for extra dwellings, over what will happen anyway, is about 1200 dwellings spread across all six inner city suburbs. Say 200 dwelling units per suburb spread over 30 years (seven units per year), and hence a total of only 50 or so additional buildings (terrace housing?) that would need to be accommodated in Mt Cook in that 30 year period.

This volume of additional housing does not warrant removal of character protection from half the suburb. The extra accommodation that is actually required, over and above what will be built anyway, could be achieved by a concerted drive to renovate and alter existing properties to create more dwelling units in a manner sympathetic to the existing character. Exploring incentives and other means to achieve this approach would be preferable to the removal of the existing character protection. Densification of the lower Adelaide Road transport corridor (between the Basin Reserve and John Street) would also meet all or much of the anticipated future demand expected in Mt Cook.

Affordable housing?

The argument used in the NPS and hence implicitly in the DSP for the "buffer" resulting from using higher population growth scenarios is that this will achieve "choice and competitiveness" (ie better affordability) in housing, due to the emergence of an oversupply of dwellings.

This ignores the reality that owners and developers won't build dwellings that are not economic, ie that don't achieve sale prices or rentals that cover the increasing costs of land and building (ever stronger building codes), insurance (higher earthquake premiums), rates (future infrastructure costs), legal and corporate ownership costs, and so on.

Making the District Plan less restrictive will do little to change the reality of unaffordability. It might on paper suggest more dwellings could be built, but the solutions needed to actually get them built and to get affordable accommodation lie elsewhere.

We argue that the DSP's proposed changes to character protection are neither necessary nor sufficient to meet the DSP's objectives. The extra buildings that are really required can be achieved with some ingenuity and effective incentives, without removing the existing character protection. Nor will an increase in the supply of affordable housing simply result from allowing more dwelling units to be built. If the relevant costs remain above affordability thresholds, affordable new housing will simply not happen.

Other challenges to the DSP proposals are set out in the following three sections.

No tower blocks in Mt Cook

A stronger focus on renovation and better use of existing housing stock would be far better than pepper-potting 4- or 6-storey tower blocks through the parts of the suburb that don't retain full character protection. With some exceptions, the land area of most sites in Mt Cook is quite small and often steep, so unless there is aggregation of sites, only two apartments per level would be typically achieved in most new builds. Thus, quite a number of new blocks would be required even to achieve the lower number of dwellings we estimate as necessary. Also, each new build involves the removal of one or two existing dwelling units, often with multiple flatmates, so it takes more new builds to get a substantial net gain. In addition, new builds are likely to be less affordable than the previous dwellings.

The loss of sunshine and privacy when a 4- or 6-storey block is built on an adjacent property can be a major source of distress. A Motu study in 2017 ("Valuing Sunshine" Motu Working Paper 17-13) found that the loss of each hour's sunshine reduces the value of a property by 2.4%. And an older case study by the Tasman District Council for the Ministry for the Environment (Technical Report 66 on Urban Amenity) found that sunshine in the house is valued as important or very important by 98% of residents.

Given the small size of many inner urban sites, revised recession plane rules and/or exemptions from them are likely if tower blocks are allowed. The resulting increase in shade from even 4-storey buildings, particularly in winter, is likely to reduce the quality (less light and warmth, more dampness) of adjacent houses. It would be ironic if a misguided push for more affordable but inappropriate tower blocks caused the existing housing stock to become less healthy.

Apartment blocks of four or more storeys high need more concrete than lower buildings built with wood. Staying with lower building height restrictions for new builds, and emphasising better use of existing structures with their embedded carbon, will help Wellington achieve the Council's zero carbon goals.

Future residential location

The underlying assumptions in the DSP may become less valid. People may be able and wish to live away from the CBD and inner suburbs, without requiring the same degree of commuting to town to work and shop.

Ongoing changes in the nature and technology used in people's work, and more recently the pandemic, have shown that many people can do much of their work from home, and this may affect people's decisions on where to reside. In turn, their places of work and associated businesses such as cafes may tend to follow them away from the CBD.

These changes themselves are reducing demands for transport, and hence help to achieve a reduction in emissions etc. Is too much weight being placed on changes to the District Plan to achieve static views on the appropriate location of housing, when other approaches such as support for decentralised locations for work opportunities, may be more effective?

In addition, the expected improvements in Wellington's public transport and cycle/pedestrian systems and better car-sharing schemes should also reduce the need to live in or close to the central city. How will developments in the wider Wellington region affect people's decisions on where to live? And there is some risk that enhancements to three-waters infrastructure in the older parts of Wellington will not be sufficient to sustain the anticipated residential growth.

A Colorado State University study suggests international experience from the Covid pandemic indicates that higher density housing raises the risks of infection from such epidemics. If correct, this further strengthens the argument against greater density of housing. If public health requirements to reduce such risks lead to enhanced codes for the design of apartment blocks, construction and operational costs for this type of accommodation may increase further.

All of these factors need to be considered much more explicitly in preparing the Final Spatial Plan.

Open space controls

The current District Plan requires that new buildings in much of Mt Cook not take more than 50% of the area on a site, though owners and developers can apply for exemption from this.

The DSP suggests (but with no specific details) that this control may be eased so that buildings can have a larger footprint as of right. One reason is that the Council would no longer require sites to have on-site parking available.

The DSP has fine words about the need for open space and green areas, but no specific proposals are put forward on how this would be achieved. Mt Cook is not well endowed with small green open public spaces in the residential area (the town belt on the western boundary of the suburb is great but is not easily accessible for many people, and the town belt on our east is completely blocked by the two colleges and Government House). It is therefore important for Mt Cook that adequate open space still be required on sites for new builds and major renovations, and to ensure that sunlight continues to get to existing houses.

Part 2: Transition Zones with the Central City

Mt Cook borders closely with the central city along Webb Street/Pukeahu Park, and it also includes the proposed Adelaide Road high density zone. There needs to be much more careful consideration given to the indicative height limits for these contiguous areas than is presently contained in the DSP. The objective should be to get a better step-down transition from the 10-plus storey tower blocks in the CBD through to the areas in Mt Cook still proposed for character protection.

There are several issues here. For both Mt Cook residents in the northern end of Mt Cook and for people living in the CBD, the open view lines from their homes towards both the city and the Carillon and Pukeahu Park are important. The proposals to have buildings higher than 6 storeys south of SH 1 and Webb St will cut across these sight lines. And in the reverse direction, the views from this area and from the city of the character housing on the Bidwill St ridge will be at risk. We urge that height limits be stepped down for all sections south of Webb St, and that MCM and local residents be involved in discussions on this.

Within this area south of Webb St, the DSP shows a large area as being "Type 4b", with prospective height limits of more than 6 storeys. This seems to take no account of two features: the general topography of this area, and the sharp interface the Type 4b area would have with the two character areas in Hankey St (Type 3, 3-4 storeys) and Bidwill St (Type 2, 3 storeys). Not only is there an unacceptable abrupt transition in building heights, much of the area proposed for towers of over 6 storeys is considerably higher than the adjacent lower-height zones. This Type 4b area climbs sharply right up the ridge to Nairn St Park above Arlington and lower Hankey Streets, and above Anderson Tce and parts of Bidwill St. It also includes the higher sections of Nairn and Thompson Streets. This proposal, which would see 6+ storey towers up on this high ground, is totally inappropriate.

This is especially pertinent for the Heritage-listed Anderson House (now owned by Te Kohanga Reo Trust) in upper Hankey St. It would be a dreadful shame if this outstanding property, while itself protected by its listing, was surrounded by apartment towers.

We accept the general principle of high density residential development along the Adelaide Rd transport spine. But the proposal to have the eastern side of Myrtle Crescent (which in fact is a strong candidate for full character protection) as being up to 6 storeys high and to have the section of King St immediately behind it treated as if it is part of the CBD is much too sharp a transition, when the opposite side of Myrtle Cres is proposed as being 3-4 storeys.

These issues are examples of a general gap in the DSP - the lack of any proposition that clear and comprehensive guidelines for the transition between zones with multi-storey building heights and those with constrained height limits will be needed. Such guidelines should emphasise the need for these transitions to be gradual, include consideration of both topography and two-directional view lines, and include step-down transition zones within the CBD as well as in the areas contiguous to it.

Conclusion

The DSP has a one-dimensional focus on providing accommodation for Wellington's future population growth. Other critical dimensions such as transport, water infrastructure, business development, open-space planning, climate change policies, regional development planning and so on may be under consideration. They are possibly implicit in the DSP, but this bigger context and its impact on the DSP's proposals are not clear and transparent. A broader Future Development Strategy, as envisaged under the NPS, should have been completed first to provide this wider picture for Wellington's development, before the DSP and its single focus on housing emerged.

MCM is totally opposed to the blanket removal of character protection from half of our suburb.

This proposal is based on an overstatement of the requirements for future accommodation. Removal of character protection will mean the gradual loss of the spirit of our community and could impact on the quality of our existing housing. There are better options for meeting the future needs for accommodation in Mt Cook and other inner-city suburbs.

Guidelines for effective transition zones between areas in the CBD zoned for multi-storey buildings and contiguous character protection areas in Mt Cook should be developed before decisions on building heights progress further. These should be developed in consultation with MCM and affected/interested residents.

MCM asks that we have an opportunity to discuss our views with WCC councillors and officials before preparation of the Final Spatial Plan begins.

We understand that no further public hearings are proposed at this next stage, but if this changes, we ask that MCM have the opportunity to present its views at any hearings.

References:

- Draft Spatial Plan (DSP) 2020 - Wellington City Council
- National Policy Statement on Urban Development (NPS) 2020 - Ministry for the Environment

- Wellington Regional Housing and Business Development Capacity Assessment (the Capacity Assessment) - Wellington City Council
- "Valuing Sunshine", Motu Working Paper 17-13, 2017
- Technical Report 66 on Urban Amenity, Ministry for the Environment (Tasman District Council Case Study at p. 105)
- Colorado State University - A lesson from the COVID-19 pandemic on the perils of density