

Proposed District Plan Submission

mtcookmobilised@gmail.com

We wish to appear to speak in support of this submission.

Mt Cook Mobilised is a community organisation in Mt Cook, Wellington. We undertake a range of community events and projects, a bi-annual newsletter and regular e-news, and promote discussion and submissions on issues of interest to our neighbourhood. We are actively supported by around 200 local people, mostly homeowners in this community.

We support more intensification of housing in our area, but want to see it done effectively and successfully, without unnecessary destruction of the diversity of our community, and its valuable assets and character.

In the 2018 census the Mt Cook population was just under 7000, with a median age of around 26, and there were 2856 dwellings, 11% of which were not occupied at all. The average number of occupants in each occupied dwelling was 2.7. The proportion of owner-occupied dwellings is low by national standards at around 25%, but unlike the country as a whole the proportion of owner occupied housing in Mt Cook has been increasing. There is considerable redevelopment and new building of social housing in Mt Cook at present - when these current projects are complete, about 15% of Mt Cook's population will be in social housing. About 25% of Mt Cook's population is students.

Mt Cook is a diverse suburb, with:

- mixed use: residential areas abutting schools, Massey University and Toi Whakaari, the National War Memorial, Pukeahu Park, Old Dominion Museum, and State Highway 1. The Wellington Regional Hospital, The Basin Reserve and Government House are close by. There are a significant number of attractive pre-1930 homes in this area and a small number of heritage listed properties – with origins in both private and public uses.
- mixed housing and population: we have significant social housing, privately owned, tenanted, and owner occupied dwellings, multi-unit and single household properties: which cater for a wide range of types and ages of people.
- convenient proximity to CBD and suburban Newtown, the Wellington Regional Hospital, supermarkets and public transport. Many people travelling from the southern and parts of the eastern suburbs transit through Mt Cook to get to the CBD and beyond.

It is a continually changing area – with plans for mass transit, the Chinese Embassy, Omārōro Reservoir and social housing construction projects all impacting at present, and we recognise that change is another element of diversity in our suburb. Managing and being involved with such changes is important to us.

Mt Cook Mobilised members enjoy this diversity, and are very keen to see it managed well into the future to continue to deliver this type of environment.

Our vision of the future

- is for continued multiple transport modes, supporting changes which develop pedestrian, cycling, public transport and car share schemes for use by local residents, and for transport to key locations as well as through this area to such regional features as the Hospital, Government House, Airport and Zoo.
- We want to retain all green spaces, such as trees in streets, the Town belt above our suburb, Papawai Stream, the Mt Cook Play Area; and to plan to include green space and sunlight in new developments.

- We recognise the strategic value of our location, our proximity to the central city, as well as the location of many places of wider interest, which all mean that there will continually be proposals for change and development that impact on this area. We want to be kept informed, consulted and actively involved in proposals that affect our quality of life in this area.

These are the ideas that shape our following comments on the Proposed District Plan.

Impact of Proposed District Plan on Mt Cook

Under the current District Plan, much of Mt Cook has had character protection since 2000, but like the other inner suburbs, the new plan reduces the area retaining this protection considerably, by more than 50%. Most of the rest of Mt Cook is designated high density residential under the proposed plan (two areas are proposed to have even greater central Wellington density designations).

The main risk we see in the Proposed District Plan is that Mt Cook will see a random scattering of tower blocks in what is a one and two storey residential suburb, with those blocks dominating and shading existing neighbours. The potential for poor health outcomes, resentment and ill feeling is considerable.

Consideration of environmental effects: there are benefits in retaining carbon by keeping old wooden houses, versus the emissions from creating the materials and construction activities needed for new builds. Has there been any analysis to assess whether the emissions deficit from all the proposed demolition and new housing construction may not be outweighed by savings in transport emissions, given NZ is moving strongly to electric vehicles, public transport and working from home?

Analysis by two of our members in 2021 suggests that over the last 30 years, the number of new dwellings in the existing "character protection" area in Mt Cook has increased by about 26%, with much of this being by infill and redevelopment of existing dwellings. Thus, character protection does not mean that the existing housing situation is frozen. In a recent report¹, the Wellington inner suburbs have been shown to be capable of meeting future housing needs in those suburbs under the existing planning rules. This evidence reinforces our view that the extent of reduction in character protection in Mt Cook is excessive, and that there are areas of considerable character and heritage value that are losing protection.

Submission:

On the basis of this evidence we submit that retaining character protection over further parts of Mt Cook will not prevent an adequate supply of housing in future, and will help keep the character and diversity of our suburb.

Being right up against the City Centre zone creates additional issues for the boundaries between zones, and creates potential for shading across those boundaries. The proposed plan has constraints on shading green areas, other than very limited recession plane requirements, but nothing to limit the shading of private properties. Why do green places get priority, but not places where people actually live?

Character areas

We are still disappointed that we lost significant areas of character housing in the Spatial Plan as it was adopted. We consider it creates too much "pepper potting" of character housing, which will diminish the overall sense of identity in our community. This particularly applies to areas such as Myrtle Crescent, Wallace Street, Hargreaves Street, part

¹ Wellington Regional Housing and Business Capacity Assessment May 2022 (Table 2.21 on page 53 of the Wellington City Chapter)

of Rolleston Street where there is considerable existing character housing. Raising height restrictions to 21 metres considerably changes the community experience.

High density provisions

We all want more housing, and consider that ways can be found to increase housing density without creating excessively tall buildings.

21 metres is too tall for the whole Mt Cook area. Possibly 14 m, or 4 stories, is the maximum that we could support across our area.

There are significant under-utilised areas “brown fields” in Mt Cook to allow for new housing. These sites should be identified and earmarked for development before the existing pre 1930s buildings are destroyed. Adelaide Road is a case in point. At present it includes many light commercial businesses. This area was identified for further residential development by Wellington City Council in 2009.

Old houses in Mt Cook are already considerably densely situated, sections are generally small, and many have two dwellings within the same building or on the same site. Some streets have multiple households at the majority of properties; Thompson Street and the western side of Wright Street are two examples.

Over time there has been significant in-fill and subdivision of existing houses in ways that suits the pre 1930s character of much of the housing. This happens in response to demand, which will continue because of our central location. We consider it is important to find ways to enable and encourage in-fill and subdivision of existing buildings rather than provide the opportunity for greater height, especially at the top of steep streets where towers would be overly dominant (e.g. Nairn Street, Thompson Street, Bidwill Street, Hargreaves Street and Rolleston Street).

Recommendation: Allowing 21 metres height to adjoin designated character areas could create towering buildings dominating the neighbourhood, and to avoid this we ask that the minimum height be reduced to 11 or 14 metres for much greater proportion of the Mount Cook area.

Multi-unit dwellings

Recognising that multi-unit dwellings are an important aspect of our suburb, we are keen to see strong design provisions.

In particular, the impacts of living more sustainably in apartments needs to incorporate provision for waste management such as composting, emergency provisions such as water storage, and access to green spaces and common areas for wellbeing, mental health, and dog-walking. Rooftop gardens, pocket parks, well designed foyers and hallways provide spaces for informal interaction which are important for community living.

The impacts of ‘leaky homes’ and strengthened earthquake provisions have been devastating for several multi-unit dwellings in our area over the last few years. The lessons from this recent history are that the need to plan for climate change, and the costs of good design need to be factored into planning.

Submission: Design requirements for multi-unit residential developments need to be strengthened to future-proof buildings and provide for good community experience; such as:

- ***Sunshine and shading: the effect of new 6 storey blocks on surrounding neighbours in existing houses, makes them shadier, damper, less healthy, and unpleasant to live in. A particular issue is if a new building blocks sunlight from existing solar panels on a neighbour's property. There are some provisions for***

recession planes, privacy, outlook space and solar access (HRZ - S 3, 14 and 15 in the proposed plan) but these are very limited and simply not adequate, given the buildings in the new high density zone (most of Mt Cook) can go right to site boundaries.

- *Set back from street: dwellings built to the site boundaries are poor quality places, require some transition from street to doorway.*

Strengthening Emergency Planning

The population of Wellington City is forecast to grow by 30 – 50,000 over the next 30 years. Many new arrivals will be housed in apartments in Te Aro and suburbs close to the CBD.

The role of the District Plan is to provide a framework for development in the City, but it also has a role to play in providing rules that will keep people safe. Rather than leave emergency provisions to chance, this review of the District Plan needs to take heed of the forecast increase in population in the city centre, many of which will be housed in apartments in a [Tsunami Zone](#)².

The population will have a need for water and sewage disposal following a major earthquake, the Proposed District Plan should address this. This gap relates primarily to apartment living, workers in the CBD, anyone who needs to evacuate from the tsunami zone. Students at all levels may be cut-off from whanau for a time. Mt Cook is the location for several major education facilities including preschools, Mt Cook School (primary), Wellington High School and Massey University, with St Marks, Wellington College and Wellington East Girls' School, nearby.

The Wellington Region is home to four major fault lines, and many smaller faults. In 1855, the Wairarapa Fault unleashed a magnitude 8.2 earthquake which was devastating for Wellington City and altered the physical landform. The chance of the Wellington Fault producing a major earthquake has a probability of occurrence of ~10% in the next 100 years, making it a credible prospect³.

Every day 82,000 people travel into the Wellington CBD for work or school. A major earthquake could see them cut-off from their home by impassable roads; some will have travelled to Wellington from other towns or cities in the region. Some may be able to stay with friends or acquaintances, but otherwise they will be looking for shelter.

Submission: We are very aware that a major earthquake or disaster will create special challenges for our area. We want to see emergency management requirements incorporated into the Proposed District Plan. This will focus the attention of Body Corporates on planning for emergency situations.

Emergency Water provisions

Wellington Water is currently building the Omāroro Reservoir in Mt Cook. During the community engagement phase for the reservoir, Wellington Water was at great pains to impress upon the community the need for the reservoir. Whilst it will not have a 'tap' on the side where people could source water in an emergency, it will double the amount of water stored on the city-side of the Hutt Road.

² <https://gwrc.maps.arcgis.com/apps/Embed/index.html?webmap=d15166c8159c45b194cc358372ac7906>

³Sadashiva, V., Mowll, R., Uma, S. R., Lin, S. L., Heron, D., Horspool, N., ... & Daly, M. (2021). Improving Wellington region's resilience through integrated infrastructure resilience investments. *Bulletin of the New Zealand Society for Earthquake Engineering*, 54(2), 117-134; p119.

Wellington Water has conceptualised an emergency model of the Wellington region as 17 “islands”, isolated from each other by road, and each needing to be self-contained immediately following a major earthquake.

The Wellington Region Emergency Management Office (WREMO) is encouraging people to store water for use for 7 days, until the community water collection points come on stream. Ideally, households should store 20 litres of water per person in the household for those 7 days (140 litres per person to last a week). During the engagement period for the Omāroto Reservoir, Mt Cook people were told in a sober fashion that in a major earthquake all the water pipes would break and it would be more like 100 days before the pipes would be repaired.

Wellington Water’s website acknowledges that the emergency water supply network will supply the more than 400,000 people across the Wellington Region who may need to survive without a water network. [Wellington City is listed as one of the areas where water supply may be disrupted for 100 days](#)⁴ The emergency water supply will be provided by various means – treated stream water, desalination, and using existing bores. Part of the plan is for Wellington City Council to mobilise people with trailers, vans or utes, to transport water in bladders to collection points within a kilometre of people’s homes. This appears to rely on reliability of bores and access to appropriate private vehicles – which could be problematic in high density areas such as Mt Cook.

Fire is another risk after an earthquake, requiring water to be close at hand.

The Wellington Region’s approach to emergency water is creative and multi-faceted. But it also seems to be complicated and fraught with weak points.

Submission: Having a focus on more stored water around the city would help to relieve pressure on emergency water supplies for those extra 100 days when the pipes are being restored.

If 400,000 people will be relying on this scenario for their water, with many in the metropolitan areas being in this state for 100 days, it stands to reason that the City should be making it easy, and in some cases compulsory, for householders to install potable water tanks that will make them self-sufficient for longer. 200 litre tanks are already available, subsidised by Wellington City Council.

In the event of an earthquake, conventional toilets must not be used. The options will be long drops, chemical toilets, or temporary two-bucket toilets that need to be emptied into a ‘humanure’ site (e.g. a wheelie bin) in a separate communal area.

Kāinga Ora, our public housing champions, and WREMO, whose role it is to purvey the region’s ‘be prepared’ messages both advise that it is an individual, or household’s, responsibility to store the requisite water, personal grab bags, and so on. However, for any number of reasons, individuals may not be able to comply. Because of the serious consequences of the City having insufficient water after a major earthquake, the planning rules need to do more to make it easier to store more water privately and in public places.

District Plan emergency preparedness

We have identified a range of items to be included in the District Plan to respond to the credible likelihood of a major earthquake in Wellington. Given the real possibility of water outages for 100 days, too much reliance has been put on untested plans. Storing more water in homes and public places around the city is essential. For people living in apartments a solution needs to be found to allow them to store more water in designated spaces within their buildings. The updated District Plan is the mechanism that can provide compulsion and gravitas to rectify this situation, which is widely ignored.

⁴ <https://www.wellingtonwater.co.nz/your-water/emergency-water/above-ground-emergency-water-network/>

Side-yards	<i>Side-yards should have a minimum width of 1.5 metres. Side-yards are where domestic water tanks are often sited. A 1,000 litre tank is likely to be 1m wide. Extra room is needed to be able to walk past a water tank.</i>
Community Emergency Hubs	<i>Schools are often the site of the Community Emergency Hubs. With the likelihood of thousands of people retreating from city offices or city apartments due to tsunami risk, Community Emergency Hubs need to have water tanks on site.</i>
Parks	<i>Parks need to have water tanks installed, unless they are within the tsunami zone.</i>
Apartment balconies	<i>Apartment balconies are not to be used for water storage, due to the weight of the water tanks. This constraint is already causing angst for people living in apartments. It is not reasonable for people to store multiple 10 litre bottles (14 litre per person for a week) within their small living area.</i>
Social housing	<i>Water tanks need to be in place for all social housing complexes, particularly for new-builds.</i>
Apartments	<i>Apartments outside the tsunami zone need to have provision for water tanks in their grounds, or in their basements.</i>
Apartments inside the tsunami zone	<i>Storage for indoor water tanks needs to be made available for apartments on level 5 and above. This is because anyone living below level 5 will have been asked to evacuate. People living above level 5 may be stranded for some time.</i>
Humanure collection point	<i>Typically, this could be a wheelie bin with a supply of dry carbon matter, e.g. sawdust, used to cover each layer of contents. The wheelie bin would need to be stored for 6 months before it is safe to be disposed of as compost.</i> <i>Each apartment block needs to designate an area to be used for humanure collection. The Body Corporate needs to determine how this will be done, and communicate this to residents.</i>

Summary

We consider that the Proposed District Plan does not give appropriate priority to the nature and character of Mt Cook, or adequately address the need for storage of water in emergency situations.

In brief, we would like to see:

- The height area lowered for significant areas of the suburb,
- more design requirements for multi unit housing
- actions to promote water storage by residents and particularly in multi unit buildings.

We appreciate the opportunity to make this submission, and look forward to discussing it with Commissioners.

Mt Cook Mobilised – Submission Group