

# Submission to WCC District Plan 2021

December 2021

## INTRODUCTION

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Inner City Wellington (ICW) believes that the Draft District Plan offers major improvements in clarity and consistency over the plan it replaces.

We contend that while the speed of future population growth can be argued, the intensification of residential dwellings within the City Center Zone is current fact and a future certainty. ICW accepts that our inner-city neighbourhoods will continue to grow and be the city's most dense residential area.

Therefore, ICW urges this Council to do everything in its power to ensure that the quality of the built environment that will encompass these rapidly growing inner city neighbourhoods contain all the public amenities necessary to support thriving, diverse, sustainable residential communities.

ICW has consistently highlighted the reality that the existing level of public amenities available to what is already the largest residential community in the city, falls well short of an appropriate level, and that the current level of intensification already occurring is exacerbating the existing deficit in amenities available to inner-city residents living in 'vertical streets'.

The actions or inactions of this Council in supporting how these rapidly growing inner-city neighbourhoods develop, with the amenities that are available to the thousands of people who don't leave the city to go home, will determine whether these neighbourhoods are places that families with children, our seniors, our key workers, the most vulnerable, our students, want to live in. That is what is at stake in this draft plan.

ICW believe that this Council has the responsibility to do all in its power to ensure a future where our inner-city neighbourhoods are places where Wellingtonians want to live.

# GREEN SPACE

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## Green Network Plan

ICW believes that the draft Green Networks plan, adopted on 27 October 2021, provides a comprehensive vision for the provision of green spaces, open spaces, and community spaces, necessary to correct the current deficit within the inner-city neighbourhoods, and provide for the necessary increase in such spaces required to support a rapidly growing inner city residential community.

The Warren Mahoney/Boffa Miskell report states “Te Aro park is approximately 1500 square metres (0.15 hectares) in area Green space the equivalent to another 10 Te Aro parks (or the equivalent of 56 tennis courts) would be required to meet the space needs of the new central city population. New spaces will need to be different from Te Aro Park to provide different user amenity value. There is also a deficit of space for existing residents of the central city which additional space should be provided for.”

And, the total available green space in Lambton (Wellington central) is 15.61 hectares but when hard surfaces (shown right), which we contend should not be considered green spaces, are removed, this reduces to 12.74. In Te Aro the situation is dire NOW: 7.03 hectares total but only 4.73 hectares when hard surfaces are removed. (In our view there is now even more hard surface)

**Therefore:**

- ✘ **ICW IS GRAVELY CONCERNED that neither the city centre zone or the centres and mixed-use design guides provide any explicit reference to the Green Network Plan.**
- ✘ **ICW MAINTAINS that, for the Green Network Plan to influence planning decisions, it must be directly referenced within the city centre zone, and the centres and mixed-use design guides.**

## Sunlight Protection

ICW has consistently advocated for consideration to be given in the planning process to the needs of Inner-City residents whose use of inner-city green space and open space extends beyond Monday to Friday business hours.

We note that policy CCZ-P13. Appendix 9 lists a number of city centre and waterfront zone areas with similar sunlight protection requirements, ranging in length from 1.5 hours to 6 hours. 2 hours appears to be the predominant figure proposed.

2 hours does not in our opinion offer appropriate support to the extended use requirements of residential users. ICW believes that both existing green and open spaces and potential spaces identified in the Green Network Plan require sunlight protection at the higher end of the proposed scale.

- ✘ **ICW MAINTAINS that for the green network plan to deliver the quality of open spaces necessary to support the needs of the inner-city neighbourhoods, current and future green and open spaces must have their sunlight protected from development. Justification should be required for anything less than 6 hours in public open spaces.**

## **DIVERSITY & DESIGN GUIDES**

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ICW has consistently expressed our concern about the quality of the lived environment being delivered in the current intensification of residential building, both through conversions and new builds.

ICW believes that a diverse population living in a healthy mixed neighbourhood will provide the best environment for business to succeed in the Inner City. Housing Development must foster that and not allow degradation of the area through domination of high-density rental properties that promote a suburb of poverty. Te Aro and Wellington Central are expected to accommodate an additional 14,148 people which we are told will require around 6200 new dwellings (which equates to 2.28 persons per dwelling). Assume apartment buildings of 100 units (i.e. average 2 persons per unit) we would need an additional 70 high rise buildings. Again, we express our concern that spatial issues are being considered without being driven by demographics of the communities we want to develop in them.

- ✘ **ICW SUBMITS that a regulated maximum population density per hectare for a mesh block is essential so that monitoring could ensure consent is not given to any new build or conversion that would result in that maximum being exceeded.**

ICW is committed to the UN Sustainable Development Goals, and we fully endorse the Human Rights Commission views on the 'The human right to adequate housing in New Zealand'.

- ✘ **ICW MAINTAINS that the current wave of inner-city residential development is not delivering the socially, economically, and generationally diverse residential communities that are the hallmark of successful residential urban neighbourhoods across the world.**

- ✦ **ICW ABSOLUTELY SUPPORTS** the inclusion of the Design Guides into the District Plan because it is essential they have statutory weight to ensure the development of thriving, diverse, sustainable residential communities
- ✦ **ICW SUPPORTS** the introduction of a City Outcomes Contribution policy where exceptions can be made to height restrictions if the result is a quality living outcome.
- ✦ **ICW STRONGLY SUPPORTS** the introduction of a points system to ensure that contributions to that quality are made whenever there is an exception.

We believe that one of the major obstacles to the creation of diverse inner-city neighbourhoods is affordability.

- ✦ **ICW STRONGLY SUPPORTS** the inclusion of Assisted Housing Provisions in this plan. We note that provisions such as these have been successfully implemented across many jurisdictions worldwide.

We note with interest the recent comprehensive consultation on this issue undertaken by Queenstown Lakes District Council.

<https://letstalk.qldc.govt.nz/70801/widgets/347922/documents/221312>

The following comments from that document are as true for the inner-city as they are for suburban development.

*I don't think any developer/builder will be inclined to make a cheaper house if they can get more money for it. For this reason, I think it needs to be mandatory.*

*Developers need to make money in order to develop. So if it is optional and reduces profit margin, it will be only taken up occasionally - developers could now provide affordable housing if they wanted to. Making it mandatory means it needs to be factored into their equation.*

*Developers will be required to provide affordable housing and to build the cost of that provision into their planning. If it isn't compulsory, it won't happen.*

This article <https://nextcity.org/urbanist-news/a-view-of-inclusionary-housing-from-down-under> provided the following data

*...mandatory inclusionary zoning in South Australia, with a 15 percent target rate of affordable housing units in new residential areas, has triggered the creation of approximately 5,500 low-cost dwellings. That amount is equivalent to roughly 17 percent of the region's overall housing supply.*

*In New South Wales, an incentive-based housing program generated an estimated 2,000 affordable rental units in Sydney, which makes up around one percent of the city's overall housing stock.*

In reviewing the 4 options offered for consideration in Assisted Housing

✘ **ICW MAINTAINS due to its broad coverage Option 4 will result in the most assisted housing being provided.**

*(OPTION 4 - Update the District Plan to implement a mandatory contribution to include some retained affordable housing – applied to both new development and redevelopments.)*

Socially, economically, and generationally diverse residential communities in our inner-city neighbourhoods are essential to meet future population growth in our city. They are also crucial to support economic diversity within our Inner-City neighbourhoods that reaches beyond hospitality and entertainment.

✘ **ICW STRONGLY BELIEVES the council must act to ensure that public and private sector key workers/ critical workers/ essential workers can afford to live in the community they support.**

This is an issue now in Wellington that will only be exacerbated as the population grows. Forcing these essential workers into long commutes because they cannot afford to live in the city is socially, economically, and ecologically damaging. The Assisted Housing provisions give the Council the ability to directly mitigate this.

✘ **ICW COMMENDS AND ENCOURAGES the Council to continue and expand the initiative to provide targeted rental accommodation through the long-term lease of Apartment Conversions such as 195 – 201 and 203 Willis Street.**

We believe these types of arrangement allow the Council to directly influence and improve the quality of the lived environment in our Inner-City neighbourhoods, as well as directly influence the social, economic, and generational diversity necessary to support the development of vibrant inner-city neighbourhoods.

## **IN SUMMARY**

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We cannot see how Council in good conscience can advocate unconstrained intensification in the inner city at the same time as claiming the reality of fiscal constraints in the provision of the necessary infrastructure required to support such intensification.

You cannot uncouple intensification of residential development from the provision of the appropriate level of community amenities required to support the people who will live there.

Whether or not in the future our inner-city will support, along with business, hospitality and entertainment, the socially, economically, and generationally diverse residential communities that are the hallmark of successful residential inner-city neighbourhoods across the world depends on Council's willingness to make some challenging decisions that will deliver development with necessary infrastructure and amenities to support the diversity necessary for those communities to thrive.

This Council has the responsibility to do all in its power to ensure a future where our inner-city neighbourhoods are places where Wellingtonians want to live.

**Stephen King**

CHAIR

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**ORAL SUBMISSION:**

*ICW advise we wish to make an oral submission to all Councillors at the Committee Meeting and ask to be notified when the paper is being submitted to the Committee.*