



INNER-CITY
WELLINGTON Te Reo Pokapū o Pōneke

VOICE OF TE ARO AND WELLINGTON CENTRAL

*enhancing community well-being
through civic engagement*



SUBMISSION
WCC SPATIAL PLAN

September 2020

EXECUTIVE SUMMARY

While ICW represents the largest population of any suburb, we live in the Central Business district. We accept the views of those who work and play in the city are important, but we will sometimes have a different perspective on what is our neighbourhood and we want that recognised. Also, our vastly different demographics need to be better considered. A Spatial Plan created without the people who will live in it being the reference point for every consideration cannot provide the integrated approach required. *This submission focuses on issues relevant to Te Aro – Wellington Central.*

ICW questions the growth assumptions that the Spatial Plan addresses and does not accept the load the Inner City is expected to take given already unacceptable density levels with totally inadequate infrastructure along with resilience issues. Although adequate infrastructure is mentioned, we contend that the current appalling state of the systems imperative for public health in the Inner City – particularly pipes for water and sewage – must have a plan for immediate remediation as a prior commitment before any further development in the inner city takes place.

Current mesh block population density levels in much of Te Aro are already unacceptably high in relation to the inadequate infrastructure, and lack of green space and amenities provided in the area. Latest developments particularly in Te Aro include both new-builds and conversions focussed on single or two room apartments which exacerbate the problems of density. Mixed housing in high rise developments, particularly with availability of long-term tenancies, will be more effective in developing safe communities.

ICW is also concerned that consents for individual buildings do not consider the impact for the wider environment. While one building might look fine at planning stage, only later is it realised that other adjacent individual consented buildings have created the development of a substandard living environment with consequent degradation both for residents and for businesses operating in the area.

The Mahoney/Miskell report, with which we strongly agree, shows there is currently a deficit of green space in the central city – that is BEFORE any further requirements relating to future growth. We highlight the need for action NOW to address that lack of current space

Entirely absent from the plan but clearly pivotal for future development of high-rise buildings are issues around insurance which are becoming a major problem and issues arising from the Unit Titles Act. If these are not addressed before further large-scale development is approved, WCC is setting up significant problems for the future.

Contrary to the WCC view, ICW believes that there could be significant change to our City's economic and population growth post-Covid-19, particularly in the Inner City and this has not been adequately addressed in the plan.

We support increasing density as a good way to deal with growth, particularly around transport links. However, in doing this it is critical to create an environment that is good for people to live in. Any increase in density needs to be allied with a strong policy on green space, on good quality design, on infrastructure and amenities. It is not just an issue of numbers of people and numbers of dwellings. Mandated standards will be required to achieve this.



Rev Stephen King
CHAIR

INTRODUCTION

Representing residents of the suburb with the largest population on the least land in Wellington, ICW has particular concerns about the way in which the Inner City in Te Aro and Wellington Central has been 'developed'. While we accept and support the principle of compactness with increased density WHEN DONE WELL, we vigorously oppose a regulatory environment that will allow any such development that will not enhance the wellbeing of residents in our area in future. In our view, healthy inner-city neighbourhoods will also have a positive effect for business. We do not want to see a 'ghettoisation' which will leave both future residents deprived of an acceptable standard of living and business of operating in a safe neighbourhood.

An appropriate framework for this plan would have been the **UN Sustainable Development Goals** which were adopted by New Zealand in 2015 - in particular Goal 11 – Sustainable Cities and Communities which aims to make cities and human settlements inclusive, safe, resilient and sustainable.

The UN seven standards for adequate living would have provided a broader plan for our city within which we could have seen how the Spatial Plan related. Performance Indicators could also have been identified through use of the UN framework. We are concerned that location and affordability too often seem to be the only criteria for development.



- ✓ Security of tenure.
- ✓ Habitability.
- ✓ Accessibility.
- ✓ Affordability.
- ✓ Availability of services, materials,
- ✓ Facilities and infrastructure.
- ✓ Location.
- ✓ Cultural adequacy

- ✘ **We ask**, “Are there areas where growth should be ‘capped’ because of density, resilience, inadequacy of infrastructure or other such issues?”
- ✘ **We contend that**, to ensure that excessive/unhealthy population densities cannot occur, the Inner City is such an area. We are told this plan will be implemented in concert with other plans but do not have the opportunity to understand how that will occur or how that might change proposals in the Spatial Plan. For informed consultation we need to see this plan in the context of a holistic City development plan.
- ✘ **We argue** that development should be phased so that it first takes place in areas which need regeneration e.g. Adelaide Road and Kent Terrace.
- ✘ **We maintain** that development must be actively planned rather than ad hoc, to ensure that growth does not give rise to low quality and/or inappropriate developments in the wrong places.

The summary of the Plan gives us no comfort when we see “Consolidating the Central City’s role as the employment and economic hub of the Region” with no mention of our Inner City suburban population, the largest in the city already, for whom it is their neighbourhood. We note that in the feedback on OUR CITIES TOMORROW no effort was made to differentiate comment from those who use the CBD for business and recreation from those who live in it. This is not acceptable. In future, we want to always see these two in tandem so that both can be given due consideration.

THE ELEPHANTS IN THE ROOM: Infrastructure, Insurance and Unit Titles Act

INFRASTRUCTURE: A glaring omission in this plan is the requirement for adequate infrastructure (water and sewage, but also basic amenities required to support healthy populations) **PRIOR to any further development.** Given the sewer pipes still popping up above ground to deal with leaks, inadequate rubbish disposal and the lack of public/green space in Te Aro in particular, to cite just three examples, it is clear the infrastructure is not adequate for the current population.

✳ **ICW contends** that in the interests of both business and residents in the Inner City, the infrastructure must be addressed urgently, and that further development in the Inner City should be restricted until this is done.

INSURANCE: The issues with insurance that apartment blocks in Wellington Central currently face are surely of concern looking to the future. Will insurance continue to be available at an affordable cost? If not, what impact will that have on whether people will want to live in the Inner City?

UNIT TITLES ACT: Similarly, the Unit Titles Act currently creates many problems for Body Corporates. Increasingly, buyers are wary of investing where they do not have control and again, we question what impact this will have on who will want to invest in future in the Inner City.

These issues combined do not provide a conducive environment for investment and no amount of spatial planning will solve them.

THE CITY AS A WHOLE

The submission form asks *'To what extent do you agree with the city-wide approach to distribution? If you disagree, how would you distribute an extra 80,000?'*

✳ **ICW submits** that the prior question is 'do we have to accept such a figure if we don't have the land, infrastructure etc to support it?' Given our Te Aro and Wellington Central area is the most at risk from earthquake, sea-level rise, and pandemic transmission, we strongly suggest that growth here must be controlled.

! **Te Aro: = 90.1% increase** (2013 = 4658 /2043 = 8855)

! **Wgtn Central: = 153.8% increase** (2013 = 1325/2043= 3363)

! The only other suburbs in Wellington showing a percentage growth of more than 50% are:

- Grenada at 76% and Churton Park at 56%.
- The next highest are Newtown at 43.8%; Mt Cook at 40.4% with most others having less than 20%.

In the projected doubling of our population we ask, for example, how will our current demographics change and what impact will that have for requirements for accommodation, amenities etc. The latest census shows:

- that 69% of residents in Te Aro and Wellington Central are aged between 15-35, mostly students and young professionals.
- We have 12 University residences in the area.
- The number of families is small, but there is a sizeable group of over 1000 older folk.

If the number of students stays stable, how will the mix change with population growth? If we want more older people in the inner city, what kind of dwelling/amenity would need to be built? How can WCC incentivise the development of mixed neighbourhoods that are more conducive to community development and better resilience? – or the mix of owner occupiers/long term rentals with short term rentals? Maybe then it will be clearer where and what kind of development needs to occur.

CONVERSIONS: We recognise it is highly likely, post Covid, that more existing high-rise buildings in the Inner City may be converted to accommodation. Such conversion needs to be much better regulated to ensure UN standards for an adequate living environment are met. We do not want

these to add only studio type short term rental options when mixed development is vital to ensure a vibrant and diverse inner-city community.

Clearly an important issue is planning for the sequencing of development. It is not acceptable to continue with development in the Inner City while infrastructure issues have not been addressed. In the interim, development should be encouraged in areas where the infrastructure either is or can be more rapidly brought up to the standard required for the population envisaged.

- ✦ **ICW questions** the growth assumptions and do not accept the load the Inner City is expected to take given already unacceptably density levels with totally inadequate infrastructure.
- ✦ Sequencing of development should focus first on areas where the infrastructure is adequate for an acceptable standard of living. Any development in the Inner City should be limited until the infrastructure issue has been adequately addressed.

VISION

The Spatial Plan states

“Our plan is to be the most liveable city. As the capital city we celebrate our unique Wellington way and our creative culture where businesses thrive. Housing is affordable, we are accessible, safe, and we continue to live close to nature. Where streets are made for walking and mana whenua culture is a living presence from harbour to hills. Our vision is a welcoming home for all.”

The Warren and Mahoney/Boffa Miskell paper CENTRAL CITY SPATIAL VISION states that in 2050 Wellington will be

“A thriving, green capital city framed by the harbour and hills, composed of interconnected, cohesive neighbourhoods that support people to lead healthy lives”

For us, the latter vision provides the better focus. By trying to be more inclusive, the vision of the Spatial Plan tends to exclude. As noted previously, we do not accept that the goal for housing should simply be ‘affordable’.

SPATIAL PLAN IN A POST COVID-19 WORLD

WCC has requested input in relation to the impact of Covid-19 – and clarifies

“...we anticipate some slight changes to the rate of the city’s economic and population growth, however the medium and long term outlook remains positive and our existing medium to long term growth projections remain relevant.”

The Submission form asks ‘How did you (our constituents) find your suburb during Covid? What spaces amenities or facilities were most beneficial? What was missing/could be improved?’

INNER CITY DURING COVID-19

Change in business/residential mix

While ICW accepts that growth in our population will occur Post Covid-19, how much of what kind, where and when is not easy to predict.

- ✦ **ICW does not accept** that there will only be ‘some slight changes to the rate of the city’s economic and population growth’.

- ✦ **ICW believes** that thought needs to be given to what already appear to be likely changes in work practices with more people working from home more often.

These changes will impact the Inner City/CBD in particular, but also the suburbs which may gain some of the hospitality options as people want more opportunities to drink/eat out locally. There may be significant changes to the make-up of businesses in the CBD with fewer corporate offices, far less retail, and much more delivery to residents through on-line shopping. Certainly, the latter brought noticeable change during Lockdown with issues of access for delivery vans and space for leaving large parcels – like many large My Food Bag cartons which do not fit in mailboxes.

- ✦ **We are particularly concerned** about empty ground floor retail spaces which are already increasing in the inner city. While short term options for popup shop spaces, art display places etc are good, they are clearly not a long-term solution.
- ✦ **ICW strongly opposes** any requirement to have commercial operations on the ground floor in future apartment buildings as the question ‘what is currently a viable business location’ is now much less certain. Ground floor usage should be determined in light of the need for much more flexibility of use in future (such as community rooms and space for apartment residents).

Green space as a critical Resilience Factor

STUDY: A useful study completed during Covid-19 Lockdown investigated reasons for visiting Tanera Park in Aro to identify the benefits that users obtained from visiting. The research showed that the park provided much more than a grassy patch to release dogs onto. The most frequent reason given for visiting was mental wellbeing. Recreation, inspiration, beauty were some others. Times of vulnerability highlight issues that are less visible in ‘normal’ times. This research confirms what we heard from inner city residents. Lack of reachable green space where one could relax or take children and animals added to the sense of loss and isolation. A related factor is the visibility of green space. In a predominantly rented high rise neighbourhood, particularly if there are no balconies, there is little investment in plants. Spending hours of daylight during Lockdown without sight of nature felt detrimental to mental health.

RESILIENCE: Another factor which deserves consideration is how density impacts on resilience plans. The issues that are created by having ‘vertical streets’ need very different approaches and the Covid-19 pandemic has taught us that pandemic preparedness needs to be included in these plans alongside the more common natural disasters of earthquake, fire and flood. We now know we must also consider each type of disaster in the context of a pandemic too. Where are the shelters in high density areas like Te Aro and Wellington Central that people from apartment blocks/student residences can go in such a situation where physical distancing can be maintained? Density along with narrow streets and lack of green space exacerbates these problems. Apartments themselves provided problems for physical distancing and contagion through contact with surfaces in common areas such as lifts and narrow stairwells where distancing and pandemic standard hygiene are difficult to maintain.

- ✦ **Contrary to the WCC view, ICW believes** that post Covid-19 there could be significant change to our City’s economic and population growth, particularly in the Inner City and this has not been adequately addressed in the plan.
- ✦ **ICW asks that urgent attention** be given to the issue of ground floor retail space in otherwise residential buildings and suggest consideration should be given to providing community areas for residents. We do not want a proliferation of empty spaces in what is our neighbourhood. That will very quickly affect safety and quality of life.

- ✦ **ICW notes** that Covid Lockdown has highlighted the importance of green space for mental health that is visible and reachable from dwellings.
- ✦ **ICW contends** that pandemic preparedness in high rise buildings which are ‘vertical streets’ has not been adequately addressed and needs to be factored into future plans and regulations. This includes the need to address population density, the mix in that population for community development/resilience, and the availability of evacuation shelters that enable physical distancing.

Inner Suburbs

Our submission concentrates on plans relating to the Inner Suburbs, specifically Te Aro and Wellington Central, since that is the area that we represent. We strongly submit that not enough attention is given to the perspective of residents living in the Inner City because since it is also the CBD, the interests of business have traditionally been those served without thought being given to the area also being a ‘suburb’. This must change. It is not acceptable now, but it is vital that as any plans for further development progress, a residents’ voice is included in planning for development of Wellington’s largest suburb.

- ✦ **ICW strongly submit that in relation to development of the Inner City, the voice of residents must be given equal weight to that of business**
- ✦ **We note** that Miramar and Strathmore have been offered the option of a community planning process being put in place there. We ask why can this not also occur for the Inner City? ICW would be delighted to work with WCC in such an endeavour.

THE GOALS

COMPACT

Our Association represents residents in the suburbs of Te Aro and Wellington Central where significant growth – a doubling of the current population - is projected as documented in the Spatial Plan.

A spatial plan should provide an all-encompassing strategic plan that clearly lays out how and where the city is expected to grow, the location and shape of future development, the transportation networks, infrastructure and community facilities needed to facilitate such growth. Unless there is a well-defined masterplan, development in the inner-city will be driven by developers and the availability of property, leading to an ad-hoc and dysfunctional approach to the shape of the city.

- ✦ **ICW contends** that using solely population projections is unacceptable in planning for the future spatial development of the city. Possible demographics should also be considered, and infrastructure requirements must be appropriately sequenced

POPULATION DENSITY

Population density has not been addressed at all in the Plan, yet it is particularly relevant when considering physical access, health and social issues, community connectivity, and resilience issues.

Taking specific mesh blocks (right) within our area, of particular concern are Wellington Central at 53.4 persons per hectare; Vivian East at 83.91; Vivian West at 94.29, and especially Dixon St at 138.14. The growth projections of doubling will seriously exacerbate this issue.

Area	Population	Land area hectares	Pop density per hectare
Dixon	4182	30	138.14
Vivian East	2403	29	83.91
Vivian West	3489	37	94.29
Wellington Central	2991	56	53.40

Already further apartment buildings have been opened or are currently being built in these areas without any apparent thought to the lack of communal/green space, appropriate amenities etc which are necessary for healthy living.

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.

BUILDING HEIGHT



- ✘ **ICW argues** that, in the inner-city, building heights should be tied to the provision of parkland. If a development is surrounded by reasonable green space at ground level (left) it would be acceptable for the building height to be higher, as it allows for light shafts and community green space.

- ✘ **However, we do have an major issue** with the size of apartment and number of people accommodated in them and with high buildings not including community space and being built ‘cheek by jowl’ (right) without adequate private outdoor space (balcony), community rooms and public outdoor green space. **We also advocate** for mixed-height developments to prevent the “high canyon” wall effects seen right.



VICTORIA ST

WIND/LIGHT/SUN/NOISE

- ✘ **ICW is concerned** that there is no reference in the spatial plan to the effects of wind with the increasing numbers of tall buildings. This can reduce the walkability in streets and the amenity of small green spaces – and more generally the overall pleasure of being in the central city. Equally, poor planning can produce lack of sunlight and unnecessary exposure to noise, which creates unhealthy environments both within the buildings and in the streets.

APARTMENT GUIDELINES

We note that Guidelines for apartments are to be updated. We contend there should be mandated regulation that can be enforced. This occurs in other jurisdictions and the result is an acceptable standard of development. This may result in more standardisation which may facilitate more prefabricated and kitset type building where costs are lower and consenting processes much easier. With appropriate regulation it would also result in adequate community and green space.

- ✘ **ICW submits** that mixed housing in high rise developments will be more effective in developing safe communities. Latest developments particularly in Te Aro include both new-builds and conversions focussed on single or two room apartments which exacerbate the problems of density.
- ✘ **ICW contends** that mandated regulation must be introduced to ensure future development meets the UN standards for adequate living.
- ✘ **ICW contends** that Universal Design Standards should be mandated

GREENER

✳ **ICW submits** that the Spatial Plan has a lot of good words and ideas which support the requirement for greening the inner city, but we are concerned that actions to date don't provide confidence that appropriate support including budgets for implementation will make any of this a reality. We would be pleased to work cooperatively with WCC in finding ways to make a real difference in this area.

We are concerned to know exactly what “Amending specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed, and enabling the modernisation of older homes” might mean. While this may be appropriate when one site is considered in isolation, it may be disastrous if too much development is permitted without mandating appropriate ground level open space

WHO guidelines state “As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5-1 hectare within 300 metres linear distance (around 5 minutes' walk) of their homes”. The map and information right are from the report to Wellington City Council in 2019 done by Sustainable Cities. It clearly shows the dearth of green space in Te Aro in particular, but also along the Golden Mile.

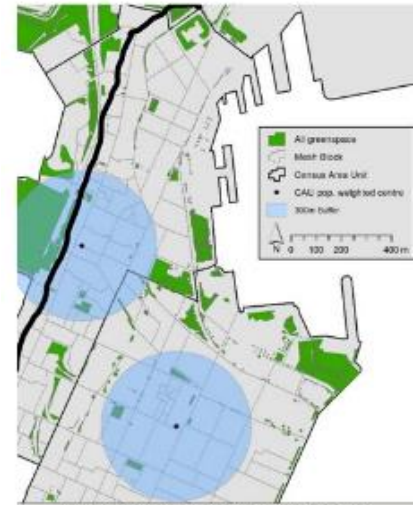


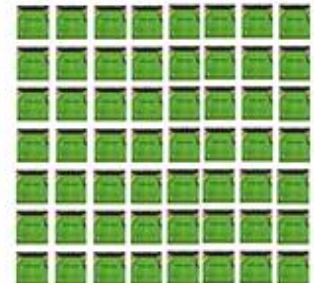
Figure 30. CAU population-weighted centres and 300m radius buffers

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).**



Much of this would not be considered green space by most people and it is certainly not communal space. It comprises anywhere there is a tree, bushes or planted area (which could be a few planter boxes) along with the few grassed areas. Some areas get taken over by cafes for outdoor seating further reducing the public amenity. The situation here requires urgent action NOW and given the paucity of options, solutions will need to be innovative. The main issue is how to rapidly obtain, plant and preserve an appropriate level of ground level green space in our rapidly growing suburb.

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-see right) 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.”



✳ **ICW strongly agree** with the Mahoney/Miskell report that shows there is currently a deficit of green space in the central city – that is before any further requirements relating to future growth. We highlight the need for action NOW to address that lack of current space while also looking for where the further 10 ‘Te Aro parks’ still required can be sited.

We note the promotion of Living Roofs in the Spatial Plan and while worthy for stormwater runoff, reducing carbon emissions and development of private community gardens which can provide both enjoyment and food production for their owners, there are very significant issues to be overcome for these to work in Wellington – wind, buildings not able to carry weight of gardens or deal with flooding in them, body corporate rules etc, and they cannot replace the public recreational green space at ground level required in Te Aro and Wellington Central.

✘ **ICW submits that green spaces must be mandated** for all high rise development in Te Aro and Wellington Central, including conversions but that when this is a rooftop garden, it does not replace the requirement for ground level public green space within a 5 minute walking distance.

VIBRANT AND PROSPEROUS

As we have discovered with Covid, good health outcomes are critical for good economic outcomes. ICW simply submits that unless the WCC shift emphasis to adequate living environments as outlined by the UN Sustainable development Goals, implementation of the Spatial Plan may contribute to the degradation of our city. Without a healthy living environment for residents, businesses will increasingly find they are operating in areas where crime and mental health issues spill out onto the streets dissuading potential customers from entering their premises. **We also reiterate our concern** at the lack of an overarching City Development Plan setting out ways of achieving this goal so that the contribution of the Spatial Plan could be more clearly seen.

✘ **ICW contends** 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.

INCLUSIVE AND CONNECTED

Significant thought and discussion with developers along with residents needs to occur to achieve solutions that do support inclusivity and connectedness. It would be good if such a cooperative approach could be sufficient to encourage inclusion of shared community spaces in high rises. However, it may be necessary to mandate these.

✘ **ICW strongly supports mandated requirements for shared community space** in high rise apartment blocks.



COMMUNAL LAUNDRY & SOCIAL AREA

RESILIENT

Our main points here relate to the issues of resilience relating to ‘vertical streets’. Unless there has been prior community development in these, responses in a disaster are much less likely to be productive and positive.

✘ **ICW notes** again that in Te Aro and Wellington Central there needs to be immediate thought given to evacuation centres that can deal with not only the residential population but also everyone else who happens to ‘be in town’ at the time and can’t get home.

A new major hall that could serve as an inner-city urban community centre would add to community development and social resilience while also providing another evacuation centre for major emergencies. At the very least, some large open green space could provide a place for tents in such times – and sport/exercise at others.

THE DIRECTIONS/ELEMENTS

NEIGHBOURHOODS

- ✦ **ICW strongly supports the WCC policy statement** that *“Open spaces within neighbourhoods and the blocks that compose those neighbourhoods will be deliberately planned for. Enclosed, or partly enclosed spaces that provide sheltered, sunny spaces suit Wellington’s climate. The interrelationship of open space to building, the height and depth of buildings to give natural light and comfortable relationships with the street are all open space attributes sought from development outcomes.”*



We will watch with interest how WCC puts this into practice.

CONNECTORS

- ✦ **ICW supports** the notion of focussing on place and movement to achieve a ‘joined up’ network that facilitates people to move around the city.
- ✦ **Regarding transport, ICW contends** that apartments should have secure space for bikes as part of their shared facilities and this should be mandated as part of the Consenting Process.
- ✦ **We would also support** provision of shared car parks being a requirement for all high-rise buildings along with a designated parking space for delivery vans.

GREENING

- ✦ **ICW supports** the notion that ‘green’ will be applied as an attitude as well as a spatial response. We would like to see people health included as an outcome here, not simply climate issues.
- ✦ **We note** also that the lack of green space in Te Aro/Wellington Central does not provide adequate green connectors for our birds to cross the city.

ANCHORS

These are *“strong and stable places providing opportunities for recovery following large scale hazard events”*. ICW represents the largest residential population in Wellington. Our suburb has the added requirement of dealing with all workers/visitors immediately following a large-scale disaster. The only anchor we can find in our area is Te Ngākau Civic Square.

- ✦ **ICW submits** that at least one more significant ANCHOR is required in Te Aro and also in Wellington Central.

AREAS OF CHANGE

Given the Inner City will be such an area *'where comprehensive redevelopment will be actively encouraged'*, we are pleased to note that *'Collaboration between public and private interests, and by groups of owners of land will be actively encouraged to enable comprehensive development comprising multiple sites.'*

- ✘ **ICW hopes** collaboration between public and private interests to achieve comprehensive development does occur and would welcome the opportunity to provide a Residents' voice to contribute to concept designs.

CHARACTER/HERITAGE

- ✘ **ICW is concerned** that this plan would erode the pre-1930s Character Area protections, allowing development and demolition without the current requisite of a resource consent in large parts of our immediate peripheral suburbs.

As we understand it Holloway Road, for example, will no longer have any character protection whatsoever. This 'broad brush' approach is not helpful.

- ✘ **ICW contends** that WCC should work urgently with each suburb to get community and expert input into determining the approach within their suburb in relation to character protection.

LANDOWNER ASSISTANCE

Some natural environment parks/open spaces exist on private property. WCC asks *'Should Council offer assistance to landowners to help them protect natural environment on private property? If yes what type of assistance?'*

- ✘ **ICW notes** that it is difficult to generalise on such an issue when each case will be significantly different. If there is a significant issue, more information needs to be given before any relevant comment can be made.

A COMMENT ON THE CONSULTATION DOCUMENTATION

We found the website difficult to use when trying to concurrently write a submission and submit that in a consultation as important as this one, a paper version should have been available. Many of our constituents simply could not access or easily navigate the website. Even for those who could download from the web, all that seemed possible was a PDF version of the summary and this was also the only thing available through Libraries. For a major consultation of this nature, this is unacceptable as it has excluded many residents from participation.

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.



email: innercitywellington@gmail.com