

Generation Zero's Submission to

Wellington City Council:
Our City Tomorrow, draft spatial plan.

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1. Our 'high level' asks for the Spatial Plan

When we think of a future Te Whanganui-a-Tara Wellington this is what we see, experience and feel (outcomes):

- a diverse range of affordable and healthy homes are provided in the central, inner and outer suburbs
- it is easy and affordable to get around regardless of the mode of transport we chose and our accessibility needs
- most of the services we need on a day-to-day basis is within a 20 minute journey of the places we spend most of our time (home and work)
- a diverse range of businesses that contribute to a flexible economy exist across Wellington
- the city is resilient to sea level rise and other natural hazards, including those that will increase in intensity due to climate change
- our local communities and groups are supported by providing them with a diverse range of places to meet and carry out the work they do
- Māori culture and heritage is enhanced across the city recognising and respecting the past, present and future
- a developing heritage, accepting that change is inevitable while ensuring we maintain connections to the past.
- a diverse range of green and blue spaces that support biodiversity and meet people's needs
- our local native biodiversity is enhanced and the city provides a safe way for them to come in.

We would like to appear in front of Councillors to support our submission, whenever that may be via video link

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2. Our dire housing situation (Our housing situation is dire and the Spatial Plan provides a good opportunity to address this)

Unaffordability

Wellington is in a housing affordability crisis. For decades, the council has banned densification in places that people want to live. Character areas, excessive building rules and low maximum heights have all meant that it is incredibly difficult to densify Wellington City. Consents have tracked well below the level of building required to meet population growth, replace old housing stock and provide adequate competition.

The result is clear. House prices and rents have exploded, eating up a majority of people's incomes. Low-income individuals have been priced out of the city, and have no option but to go to the Hutt Valley, Porirua and the coast where some house building is allowed. Wellington is now at a stage where we not only have to plan for significant future growth but addressing the artificial increases in house prices over the past few decades. As outlined below, supply is the primary driver of this unaffordability crisis.

Health

Wellington also has a housing quality crisis. Very little competition between landlords, little ability to undertake new developments to replace ageing stock and land prices eating away money for higher quality materials all contribute to this state of affairs. Wellington's housing stock is cold, damp, mouldy and draughty. Many renters and even owner-occupiers suffer from cold winters and housing-induced respiratory illnesses. We are one of the only countries in the OECD that consistently reports outbreaks of rheumatic fever - our housing is the cause of this problem.

Choice

Much of Wellington's housing stock was design for living patterns 100 years ago. Big families with the need for backyards. In today's context, that means overcrowded flats and a scarcity of smaller places to live. Many people do not want to pay for a backyard, or large decks when many suburbs have ample green space nearby. The lack of choice also hits older people - there are very few downsized options that are not apartments in the inner city. This all contributes to space being used inefficiently.

Accessibility

Our city's has a shameful record on accessibility. Only a tiny fraction of houses are suitable for the many people in our community with physical disabilities. The Spatial plan ought to cater for all people, and have a commitment to all new builds being accessible. Key to note is that the Spatial Plan is the best chance for reengineering our

city towards a kinder, more accessible society: but the Plan *must* commit to accessible design in principle and not leave it up to the district plan.

Emissions, biodiversity and infrastructure costs

The blocking of any meaningful development in a growing city means only one thing - that development is occurring elsewhere. Porirua, Hutt Valley and the coast all have sprawled to accommodate people priced out of the city unnecessarily. Homes being pushed further north on productive farmland and beautiful open space is detrimental to our biodiversity. Those communities also have little ability to lead low-carbon lifestyles, requiring a car, long commutes and carbon intensive infrastructure to service them. Allowing more development in the city, close to workplaces and existing amenities will create an urban form that helps reduce carbon emissions.

Social cohesion and building communities

The status quo is more gentrification of existing suburbs and uncontained sprawl. The people that make this city diverse, interesting and vibrant are slowly being priced out of their communities. Sprawling suburbia locks in car dependency and leads to communities with little connection to their places of work, school or whanau.

Who does this impact?

The housing crisis has gotten to the point where even middle-class wage earners on good income are paying half their income in rent or mortgage payments. The situation for young people, poor people and those often discriminated against in rental accommodation is dire. Many see no opportunity to find an affordable rental, have a reasonable commute or ever own a home. Meanwhile, existing homeowners reap the rewards of capital gains and high rents.

3. Why we strongly support the spatial plan

Generation Zero strongly supports the Spatial Plan as it delivers a more dense urban form than the alternative. Medium and high density housing are key to reducing carbon emissions caused by car dependent, greenfield commutes. There is a strong evidence base for the benefits of dense urban form and the impacts on climate change mitigation.

Central City

We support increasing the minimum building height to 6 stories, and the maximum building height to at least 10 stories in the inner city as this will significantly increase the development capacity of Wellington, enabling more housing and commercial spaces to be built. We would support buildings of more than 10 stories if the conditions allow the building to be structurally sound.

We strongly support integrating the Centres zoned area bordering Adelaide Road between Rugby Street and the junction with Riddiford Street into the Central City area zone as these areas are within easy commuting distance of the CBD, and are along the proposed mass rapid transit route. The city should be focusing development in this direction because it is an area with good ground conditions for building and is at reduced risk of sea level rise.

We also support integrating identified Thorndon Inner Residential zoned properties into the Central City area zone as these areas are also within easy commuting distance of the CBD, and are along the proposed mass rapid transit route. However the council needs to ensure this zoning is consistent with sea level rise predictions and climate modeling.

We should not be investing development into areas at high risk to storm surges where future investment will be required for managed retreat. There is a high carbon cost of building on less resilient land where buildings won't survive their potential life span.

Generation Zero would support rezoning the lower section of Aro Valley to be included in the Central City area as well as this area is in easy walking distance of the CBD and would be well suited to higher density development.

The plan proposes *“development of guidance to encourage better apartment design, particularly around the size and usability of internal space and amenity considerations such as access to natural light and outdoor living areas.”*

This needs to include a strong focus on designing for accessibility, with requirements that ground level apartments apply universal design to ensure there are more homes available for people with disabilities in the inner city.

We agree that access to natural light is important for the wellbeing of occupants, but do not agree with any justification that this is *necessary* to keep homes warm. Building to higher passive design standards can ensure warm, dry homes with less direct sunlight than is the desired norm at present.

We support the plan to identify a range of distinct neighbourhoods in the central city if this is for the purpose of neighbourhood scale master planning with community codesign to ensure people have easy access to key amenities, like school, shops, green space, within their suburb.

The plan has identified anchor sites, like the Te Ngakau precinct , as areas of resilience to concentrate development around. However, several of the sites are very close to the waterfront and we'd question what level of consideration was given to the sea level rise risk and earthquake resilience of these sites - is it worth encouraging investment in these areas that are at high risk to Climate Change?

Inner Suburbs

Character Areas

We strongly support re-focussing pre-1930 character controls on designated sub-areas within the Character Areas that exhibit a cohesive streetscape character, and removing pre-1930 demolition controls over those parts of the Character Areas that no longer exhibit a cohesive streetscape character or where character has been.

Reducing the size of the Character Areas to focus on well-preserved sections while allowing homes in poor condition to be redeveloped. This will provide more homes close to employment, transport, recreational activities. Generation Zero would support further refining these Character Areas as the current proposals for reduction are not sufficient to allow the equitable development we need in our city.

At the moment there are approximately 5,500 pre-1930's houses that can't be demolished without resource consent. These homes represent a massive equity issue for the city, as they are extremely unaffordable, many of them are in terrible condition, and are occupied by renters who have limited housing options.

The high cost of demolition consents restricts development and forces people to live in these buildings that are making them sick as they often do not have any other choices. It contributes to the in-affordability of housing in our city, forcing people to move out of the city, taking real character with them.



Image description: a dilapidated house, typical of the housing quality in the current character areas.

We do not agree with the criticisms of other organisations that this plan will result in an immediate demolition of large sections of Wellington’s “Character” and replace it with slum-like poor quality high density housing that ruins neighbourhoods for the following reasons:

Even if developers don’t need a resource consent to demolish an old home, they will still need a building consent for whatever they propose in its place. At this stage the council can impose strict building quality and streetscape rules that will be set as part of the District Plan review in 2021. These can be used to ensure high quality design that is architecturally suited to the environment.

Reducing the cost of development by removing the requirement to apply for a demolition consent means developers will have more resources available to invest in higher quality design.

People who own well-maintained character homes that deserve to be protected are unlikely to sell these homes to developers. It is the poor quality homes that will be targeted for development.

The primary purpose of houses is to be homes for people, *not* museum/art pieces. At the moment many of these houses are not serving that primary function and the fact that so many of them have not been improved to modern standards to date, suggest they're unlikely to be improved in future. Placing a higher value on aesthetics than the well being of the residents of character homes is unethical.

Owner-occupiers in these areas tend to be the most affluent members of our society. It is inequitable to allow these suburbs to escape density requirements and push those on to less affluent parts of the city.

The current definition of "Character" by many of these groups, and often by Wellington City Council, is almost entirely focused on colonial heritage in the form of pre-1930s villas. For the capital city of Aoteroa, this stance is frankly completely unacceptable.

The level of resourcing that has gone into the identification, classification, and protection of these character areas is deeply concerning considering how little resource has been invested into doing the same for the heritage and taonga of mana whenua, and of the natural heritage of our city. Taking a protectionism approach to colonial buildings does a disservice to our treaty apartments under Te Tiriti o Waitangi.

Identifying sites of significance for Maori is not enough. The Spatial Plan needs to make a commitment to highlighting, enhancing, and protecting these sites to the same degree they have done so for the current Character Areas. Anyone should be able to walk down a street in our city and know that they are in Whanganui-a-Tara in Aotearoa which means we need more investment in decolonising our built environment. We need more investment in spaces like Te Aro park.



Image description: Te Aro Park, Dixon Street, Wellington.

Natural heritage is such an important piece of Wellington's character and so unique to cities in Aotearoa - we should be making the most of this taonga and investing more resources in enhancing this rather than the colonial heritage. Mount Victoria has value as Tangi Te Keo, an important maunga for our city, rather than a museum of old houses that aren't adequate homes.

An important part of enhancing our natural heritage is investing in the three waters infrastructure. We would like to see greater emphasis on water sensitive design in the planning of the city, and believe the Spatial Plan should include plans to daylight more of Wellington's streams where possible.

Natural heritage is important for people's wellbeing, especially in a denser more compact city where people have less private outdoor space. Under the status quo, zoning limits incentivise single storey subdivisions which infill garden spaces. With height restrictions lifted there is more incentive to provide communal green spaces and it provides planning rules that allows more sharing of green spaces.

Density

We strongly support encouraging density in the inner suburbs by increasing building heights to at least 6 storeys within a walkable catchment from the central city to enable more housing and mixed-use development close to the central city and is consistent with the NPS-UD.

We support restricting building heights in character sub-areas and gradually increasing these in the buffer zones, however we think that the character sub-areas and surrounding buffer zones are too large and should be further refined. These areas are so close to the city and ideal for equitable-density.

We support 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. Again, the council needs to introduce controls for accessibility, with requirements that ground level homes apply universal design to ensure there are more homes available for people with disabilities in the inner city.

Outer Suburbs

We support the proposals to upzone building heights along transport corridors in the outer suburbs to encourage higher density. More affordable housing in these suburbs would provide an injection of people to rejuvenate the suburban centres and strengthen their local economies, providing greater amenity and making the suburbs more livable to a greater range of people.

We support the plan for the outer suburbs for the most part, however would like to see some amendments:

Kelburn should be re-zoned as an inner city suburb and up-zoned accordingly.

This suburb is very close to the inner city and should be developed to a higher density, especially to support the student population who would prefer to live closer to Victoria University if the housing was more affordable.

Some re-zoning in the plan is a bit blunt. For instance, in Miramar only the industrial areas have been raised to 6 stories whereas we believe other parts of this suburb could support higher density as well. The lot sizes up-zoned across the city are often too small for them to realistically be developed.

Similarly for Island Bay, where only the shops have been up-zoned. This suburb could support far higher density as it has strong public and active transport links and lots of available space.

The council needs to ensure there is strong master planning for the outer suburbs that accounts for general livability, community facilities, and transport connections. They need to ensure that these suburbs are a viable option for people with disabilities to live

in as well, by ensuring accessible housing is built, and applying the accessible journey to ensure people who live there can access the shops, transport, a route to the inner city etc.

Generation Zero would like the council to halt development of unsustainable communities in green-field sites in Upper Stebbings Valley & Lincolshire Farm and instead focus on enabling density closer to the city. The city has declared a climate crisis and we cannot afford to be investing money in sprawl when we desperately need people to be living in more compact, low carbon homes.

4. General

- The provision of Water Sensitive Urban Design should be included in all developments. The measures implemented should be determined through a detailed structure planning process.
- When considering green spaces, the Council should consider how it can use them to provide for WSUD and address the urban heat island effect.

Our response to some of the criticisms of the Spatial Plan

Some submitters have said that Wellington's housing is not in crisis. There is an existing housing supply deficit in Wellington. Wellington City Council officers have provided extensive information about how Wellington's housing supply will not keep up with growth.

People who would have traditionally been able to afford to buy a house are renting for longer in Wellington:

- Less Wellingtonians than the New Zealand average own their own home (47.3% for Wellington and 51.3% for New Zealand).
- This rate is low considering that Wellington's average salary is \$85,030 which is well above the \$ 77,799 average salary for New Zealand.
- The median rent in Wellington city is \$440 which is well above the New Zealand median of \$340 per week.
- High rental prices are a symptom of a housing market where supply is not meeting demand.

Enabling density creates more housing supply and makes housing more affordable:

- As at May 2020, the median house price in Wellington region is \$677,510. This is up from \$385,000 10 years earlier. That means that the median Wellington property increased in value by 5.8% each year, or \$29,251 on average.¹
- Trade-me reported in July this year that *“In Wellington city, the average asking price was \$814,850, a 7 per cent increase”*
- The suburb that grew the slowest over 10 years was Wellington Central, which grew at a rate of 3.81% per year. That’s 44.5% slower than the median Wellington house price.
- Wellington's median house price is currently 107.61% of the national median house price.

There is a fundamental supply deficit of housing in Wellington City. This is the catalyst for further housing problems like quality of housing and lack of housing choice. This deficit needs to be addressed and housing needs to be built for Wellington’s future growth.

Some submitters have said that we do not want more growth in Wellington City because we are a large enough city and should be focusing on degrowth. High rents mean Wellington becomes a boring city in a number of ways:

- Wellington should be a city that welcomes new residents. This reflects a city that is tolerant, inclusive and diverse. Cities benefit from diverse populations, and as the creative capital of New Zealand especially, Wellington should provide housing for a wide range of future residents to maintain its character as an exciting and vibrant place to live.
- As a capital city it is especially important that all New Zealanders have the opportunity to live here if they choose.
- This growth will happen elsewhere in the Wellington Region and in the country if it is not planned for in Wellington’s city centre and inner suburbs. This sprawl has a direct impact on carbon emissions, traffic congestion, and how connected communities are.
- Continuing to constrain housing supply through restrictive housing density does not prevent growth, it creates sprawl and unaffordability.

Questions about whether infrastructure works for a densified city:

- Core infrastructure involves both fixed costs and maintenance costs, as well as costs that emerge from a more fragmented system. Sprawled urban development increases all of these costs.

¹ <https://www.opespartners.co.nz/property-markets/wellington>

- Wellington has historically underinvested in core infrastructure like three waters and public transport in areas where density is now proposed. The certainty that the spatial plan provides for where future population will grow, will allow for better future core infrastructure planning by providing economies of scale.
- Density provides benefits for how cities provide goods and services like supermarkets, doctors offices, hospitality and schools. For cafes and bars in Wellington, density provides a massive opportunity to regenerate after COVID-19.
- Cheaper housing costs also provides people with more disposable income to spend on hospitality businesses.

Implementation of the Spatial Plan

1. Once the Council has made a decision on implementing the Spatial Plan the next step will be its implementation. We think that effective implementation is contingent on:
 - a. a District Plan that
 - b. a supportive RM system
 - c. Building Act
 - d. Effective public transport
2. Below we discuss why each of these are important and the actions we think Council can take.

District Plan

3. When developing the District Plan we ask that the Council:
 - a. [come back to this once we know what improvements we want to make]
 - b. ensure that the Spatial Plan is implemented in full. We are concerned that the intent of the Plan could be weakened through the framework set out in the District Plan,
 - c. consider how accessibility can be incorporated into performance conditions and resource consents.

Review of the RM system

4. We request that the Council engages with Central Government as it continues to review the resource management system to ensure:
 - a. that the Spatial Plan and District Plan can be implemented effectively,
 - b. that the tools Council can use to effectively implement these plans is provided in these planning frameworks.

Changes to the Building Act

5. We request that the Council engage with Central Government to encourage it to continue to review the Building Act to ensure:
 - a. buildings constructed align with accessibility requirements,
 - b. people are encouraged to use materials that have low emissions or impacts on the environment.

Effective public transport

6. We request Council continue it's work on a transport system designed for long-term sustainability. It needs to be accessible, safe, equitable, and affordable for everyone.