

LIVE WELLINGTON SUBMISSION GUIDE

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THE BASICS

WHAT IS THIS GUIDE FOR?

- 1 This guide helps you submit on the Wellington City Council draft District Plan.
- 2 This guide provides you with advice on issues as Live Wellington sees them city wide and provides suggested submission points on these issues. It also suggests how you can incorporate local concerns.

WHAT AM I SUBMITTING ON?

- 1 The draft version of new District Plan for Wellington. The District Plan is the planning rulebook for the city.
- 2 This round of submissions is a non-statutory process which means it is governed by general Council procedures rather than the specific legal requirements of Schedule 1 of the Resource Management Act.
- 3 This is important because it means your submission must be considered even if it is not “on” the Plan in the sense of referencing specific parts of the document.
- 4 Further consultation on the statutory version of the District Plan will occur in mid-2022.

HOW DO I SUBMIT?

- 1 Option 1: You can register through the WCC online portal and comment section by section on the draft of the Plan itself -<https://eplan.wellington.govt.nz/draft/>. There is a detailed PDF guide on how to do this at this link:
https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0018/16902/User-guide-making-a-submission-on-the-Draft-Wellington-City-District-Plan.pdf
There is also a variant of this where you can submit via questionnaires on each section of the Plan. See the WCC District Plan webpage above and follow the links for details of how to do this.
Direct submission in the draft Plan is a good option if you already know the specific sections which you want to comment and feel comfortable navigating the document.
- 2 Option 2: You can write your own submission and email it to the Council at planningforgrowth@wcc.govt.nz This option may be easier if you want to make some key points about aspects of the plan and your local area but are unsure exactly where to find these points in the Plan.
- 3 This guide is written to support you if you choose to use Option 2 above; you may find the information helpful for Option 1 as well.

DO I NEED TO BE AN EXPERT TO SUBMIT?

1. The language and terminology of planning can be daunting. The process of signing up via the Council website and commenting on an online document may be off-putting for some. Fear not – this guide tells you how to write your own submission and email it to the Council.
2. Council staff and consultants are paid to turn your concerns and views into language in the Plan. So you need to make it clear what you want and don't want and why, but you don't have to use the technical language of planning.
3. Council also has a Friend of the Submitters service. Their website describes this service as follows:

We understand that RMA processes can be a little daunting so a 'Friend of Submitters', Emily Bayliss, will be available through the consultation period to assist submitters...

Emily is a qualified planner who is fully independent and has had no involvement in developing the Draft District Plan...

To contact Emily for assistance please email friendsofsubmitters@wcc.govt.nz or phone 027 803 0080.

The Friend of Submitters service is provided by the Council to remove barriers and foster participation in the District Plan review process.

OK, SO WHAT DO I SAY?

- 1 DO start with your name, contact details (ie address, phone number and email) and something about yourself and why you are making the submission.
- 2 DO say whether you would like speak with Councillors about your submission if the opportunity arises. At the moment we don't know whether or exactly how this will occur with the draft District Plan.
- 3 DO set out clearly what concerns you and why, and say what change you would like to see.
- 4 DO use your own words if you can as this is generally more effective than simply copying another submission, though of course you can use material in this guide if you want.
- 5 DO say what concerns you locally – for example, if you are worried about a particular park being shaded, as well as making general points.
- 6 Finally, a brief submission is always better than no submission.

THE LIVE WELLINGTON FRAMEWORK

HOW DOES THE LIVE WELLINGTON FRAMEWORK RELATE TO THE DISTRICT PLAN?

The District Plan is a huge opportunity to create a plan for Wellington that tackles climate change, accommodates more people, maintains the charm and character that Wellington is known for, and enhances the well-being of everyone, while minimising costs for the city.

The draft District Plan, as currently proposed, will not do that. Instead it risks turning functioning neighbourhoods into a mish-mash of heights and shading with little attention to design quality, while doing little for affordable housing. In the process it is likely to pit neighbours against each other, and miss the chance to create a climate-friendly city that inspires existing and new residents.

To counter this, LIVE WELLington proposes five integrated solutions:

- Sequence development
- Involve communities
- Lead by engaging
- Plan for quality
- Protect experiences that matter

You can read more about the Live Wellington framework on our website at livewellington.org

This framework can apply across all parts of Wellington, and is as relevant in Tawa or Johnsonville as it is in Aro Valley or Newtown. Local context and landscapes influence how this framework applies to each area, and planning needs to be granular and local to deliver the best results.

WHAT DOES THIS GUIDE COVER?

This guide is focussed on how to achieve intensification in ways that deliver better housing, lower emissions and strong communities. You may wish to comment on other matters also.

This LIVE WELLington guide sets out high level changes that are needed to better provide for a liveable city by design. These proposals are organised under the five key areas of the LIVE WELLington framework. These changes are intended to apply across the various parts of the draft Plan. Organising them under our five headings means you only need to make a point once!

In each section, you'll find:

- some general arguments in favour of each solution,
- specific suggested submissions to make on the Plan, and
- an invitation to you to back these up with local examples.

KEY AREAS ON WHICH YOU NEED TO SUBMIT

OBJECTIVES

The plan starts with high level objectives. In general the provisions of the Plan need to be more appropriately tested against these objectives.

DETAILS DON'T ALWAYS SUPPORT OBJECTIVES

A key piece of feedback is that the provisions in the District Plan don't always support its own stated objectives.

A couple of examples can demonstrate this:

Intensification

The plan proposes that *urban intensification is delivered in appropriate locations and in a manner that supports future generations to meet their needs.*

The details of the plan encourage haphazard intensification of individual sites with little consideration given to the impact of these changes on the ability of people and communities to meet their needs in the present or future. The term appropriate needs definition and application at the local level, given that adverse effects are specific to sites, locations and landscapes.

Climate Change

The plan proposes *a net reduction in the City's carbon emissions by 2050.*

At an overall level, this target lacks ambition and urgency. The details of the Plan encourage haphazard intensification of individual sites with little coherent planning for moderate increases in density close to public transport in lower density areas. The 2015 Urban Growth Strategy by comparison offered a more coherent, evidence based approach to the type of urban form that will lead to lower emissions. The Plan also fails to promote adaptive re-use of existing buildings as a lower emissions alternative to demolition and rebuilding.

THERE ARE MISSING OBJECTIVES

The built environment actively contributes to people's ability to orientate and locate themselves in an urban environment and thrive within it. Awareness of heritage, experience of overall and local character, and an ongoing emphasis on quality in urban design, all make a positive contribution to people's wellbeing. The centrality of these matters to the urban design qualities of the city is missing from the Plan at the objective level.

The objectives also need to recognise the importance of involvement and local context, recognise that agency (in the sense of people having some influence over decisions that affect them) is also important. There is no mention at a high level of the value that local agency and participation in decisions brings to overall wellbeing. Rather the plan places a heavy emphasis on the primacy of expert decision-making and lacks any emphasis on the value of notifying people about changes that may affect them.

Such an approach can lead to faster decisions, but needs to be grounded in community-level planning to enable faster decisions that are also good decisions. With the Resource Management Act, sustainable management is about people and communities providing for their needs. The use of the term “community” implies that community processes are fundamental to sustainable management.

SOME EVIDENCE UNDERPINNING THE PLAN NEEDS TO BE REVISITED.

Closely related to the objectives in the Plan is the idea of development capacity. Part of preparing the draft Plan involved the Council out the available “development capacity” under the Operative Plan and the draft Plan. This assessment underpins many proposed changes in the Plan. The work did not consider the impact of a less hands-off approach to realising capacity on under-utilised land.

LIVE WELLINGTON proposes the City actively works to increase development on under-utilised land (see below under Sequencing). We believe the Council needs to redo its assessment based on the faster rates of development on under-utilised land that the LIVE WELLington approach would deliver.

SAMPLE SUBMISSION

SUGGESTED GENERAL SUBMISSION

I submit that the District Plan objectives need to be amended to

- *recognise the positive value of participation in decisions on an ongoing basis, and acknowledge that this is central to communities being able to meet their needs on an ongoing basis*
- *reflect the positive contributions heritage, character and quality design, and the ability to read stories in the urban landscape, make to overall wellbeing*

I submit that the detailed provisions of the District Plan need to be more rigorously tested against the objectives to ensure that the Council’s chosen methods are the best options to deliver on the objectives of the Plan.

I submit that the Housing and Business Capacity Assessment needs to be re-evaluated to include the effect of higher rates development on under-utilised land arising from a more active leadership role by Council.

BACKGROUND

As it stand, the District Plan opens up huge areas of the city for intensive development. This is in line with the Spatial Plan (agreed by council in June 2021), which has a 30-year horizon. However the District Plan addresses the next ten years. A no-regrets approach is one that emphasises fast action to tackle low hanging fruit over the next decade, while giving us the opportunity to adapt plans as we learn from experience.

Throughout our city are many sites that sit idle or underutilised¹. Huge tracts of land are crying out for leadership to develop the homes, green spaces and small business facilities we all deserve. Filling in these gaps provides a means address much of future housing demand while avoiding adverse effects on quality, amenity and character. Indeed, well-designed development on these sites can contribute positively to Wellington’s liveability.

Many of these sites are close to public transport and could be developed to create the hearts for new 15 minute communities. Doing density well on this land can provide tens of thousands of quality homes across the city close to public transport and local facilities; this also assists with infrastructure planning.

LIVE WELLington wants the Council to focus on:

- the development of underutilised land close to public transport routes through active facilitation and partnership between key players
- the early sequencing critical infrastructure investment to support sites where housing can be most quickly built, avoiding the dispersal of council efforts across virtually the whole city; *this sequence ought to be aligned with the sequence set out in the Spatial Plan*
- the engaging of existing communities in design so new developments are welcomed, not resented.

Carefully-planned increases in density across the city enable and support the emergence of 15-minute communities These are also known as “urban villages” and refer to a 15 minute walking time that encompasses a concentration of local services and public amenities easily reached on foot. Doing this well will lower emissions more quickly than current proposals, as well as creating more housing more quickly. At a practical level, coordinating the timing and location of public infrastructure investment and private development investment is crucial if our city is to realise the best value from both as we grow our capacity to house people well.

¹ Land that is vacant, used for storage and parking, or occupied by low-quality low-rise commercial development, and can be developed for housing and mixed use under current planning rules. We also include derelict buildings.

SAMPLE SUBMISSION

SUGGESTED GENERAL SUBMISSION

I submit that the District Plan needs to set out a clear sequence for intensification, and use zoning appropriately to achieve this, rather than upzoning broad areas of land; in particular I submit that:

- *this sequence ought to be aligned with the sequence set out in the Spatial Plan.*
- *this sequence ought to focus first on major areas of underutilised land and smaller groups of underutilised sites close to public transport.*
- *The next priority ought to be land identified for intensification through community-planning processes which also aligns with infrastructure and transport investments.*
- *This sequencing needs to be clearly aligned with infrastructure investment to provide certainty and avoid dispersing Council efforts across the whole city.*
- *Council needs to make full use of all methods available to support faster, high quality development on these sites and to explicitly identify these methods and the expected results in the Plan.*
- *Council needs to make full use of the qualifying matters provisions in the NPS-UD in order to better locate and sequence land for intensification.*

SPECIFIC EXAMPLES

You can provide specific examples of areas of underutilised land to support the general points above. These add weight and specificity to your submission and will vary between suburbs and locations. Here are some examples from various areas to help you shape your own suggestions.

Example 1:

The Northern end of Adelaide Road is a clear example of a major brownfields site that is crying out for a masterplan coupled with a collaborative approach to development to ensure appropriate orientation and alignment of individual developments. Coordination rather than simply inclusion in the city centre zone is needed to ensure great urban design outcomes in terms of sunlight, building design and greenspace.

I submit that the draft District Plan ought to be amended to reflect this approach for Adelaide Rd.

Example 2:

Abel Smith St east of Victoria St is a classic example of underutilised land; although already upzoned development has been limited and haphazard. A block scale masterplan together with active coordination amongst key interests is needed to realise the potential of this area and deliver a high quality urban experience with appropriate design and provision of greenspace.

I submit that the Plan needs to recognise this potential and explicitly include methods to increase the rate at which the potential of this area will be realised through timely, quality development.

Example 3:

Thorndon Quay - adjacent to and north of the Railway Station yards. While this area already has a greater density of buildings, it also has significant areas occupied by often one storey commercial buildings. It is the undeveloped "air space" along this transport spine that could be targeted for a masterplanning exercise to increase residential densities in new apartment-type buildings of greater height. Maintaining the existing commercial uses in a mixed use zone would also be an important part of this masterplanning as the intention would be not to displace these existing uses, but to assimilate them into more intensive residential development.

I submit that the Plan needs to recognise this potential and explicitly include methods to increase the rate at which the potential of this area will be realised.

BACKGROUND

LIVE WELLington believes that, given the opportunity, Wellingtonians will relish the challenge of working together. We want to see participatory design projects, coupled with clear housing targets, so communities are involved in welcoming new people. Imposing arbitrary change when better options exist simply fosters local resentment.

Warm, dry homes are essential, but these should be warm dry homes in thriving communities. Working with people to create new housing, green spaces and small business space means we build connection and community into the way change occurs.

Careful design and planning grounded in local knowledge can deliver better results more quickly than blanket rezoning. Some suburbs such as Newtown are proactively taking a lead in rethinking their localities. Such initiatives create a sense of community, enhance democracy and deliver change in ways that build on community strengths.

LIVE WELLington wants to see our city invest first in win-win opportunities and at the same time work on community level planning focussed on welcoming more homes and people while also strengthening existing local qualities and sense of community. This way everyone is clear where, when and how new housing can appear.

SAMPLE SUBMISSION

SUGGESTED GENERAL SUBMISSION

I submit that the draft District Plan needs to be amended to identify a sequence of communities which will be involved in community-based planning, based on the sequence set out in the Spatial Plan.

I submit that community-based planning ought to be included as a method for intensification and that a detailed description of the process be included in the Plan; this ought to include targets for housing intensification within these areas and processes for delivering intensification on sites identified as appropriate for such development.

I submit that the draft District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours.

I submit that the draft District Plan needs to be amended to encompass more new developments as controlled activities in respect of urban design so as to ensure that quality in design at a local level can be considered for the majority of developments, and that this process is tied to community-level design guides as they are developed.

SPECIFIC EXAMPLES

You can provide specific examples of community planning initiatives in your local area which could be included in the Plan. You can also provide examples of successful local resolution of issues through the consent process. On the other hand you can also identify specific locations within your community where proposed new rules would mean community amenities could be adversely affected. These add weight and specificity to your submission and will vary between suburbs and locations

BACKGROUND

Local government, central government agencies, private developers, and communities need to work in partnership not as adversaries.

We need to look at concepts such as joint ventures, and masterplans for areas which include quality design guides that enable owners and developers to quickly assess prospects for development. We need to learn from the best international examples of how to use public investment in the mix so as to create affordable housing and community amenities, not leave this to chance.

Our city is crying out for innovative models for public and private investment working together to rapidly develop Wellington's large areas of underutilised land into high quality housing, greenspace and small business facilities. Current proposals assume a meagre 14% of rezoned areas will be developed. This lacks ambition.

LIVE WELLington wants to see partnerships that can realise the potential of at least half our underutilised land in the next ten years.

A key broker in facilitating this can be our city council, potentially with an Urban Development Agency as part of the toolkit (for example, this might involve an enhanced, more public entrepreneurial role for *Build Wellington* - the Council's current, somewhat underutilised development agency).

Alongside our city council needs to sit mana whenua so that the Treaty relationship is central in this process. Public entrepreneurial leadership, rather than deregulation, is the key to solving the big challenges our city faces.

SAMPLE SUBMISSION

SUGGESTED GENERAL SUBMISSION

I submit that the District Plan needs to identify development partnerships as a method for achieving an increased rate of development on land that is underutilised, and that the Plan also needs to identify the key potential actors

I submit that the District Plan needs to identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.

I submit the assessment of housing capacity in Wellington needs to be based on a target of realising at least 50% of the development capacity (as measured under the Operative Plan) on underutilised land over the term of the draft Plan, and that the draft Plan needs to include methods to achieve this.

SPECIFIC EXAMPLES

You can provide specific examples of underutilised sites and areas which could be suitable for development partnerships. These add weight and specificity to your submission and will vary between suburbs and locations.

BACKGROUND

Quality is about the care we take with our city surroundings and the valued features of our residential lives. Good design enhances those features through the addition of thoughtful new development, and adaptation of what already exists. Quality is about good design on a site, as well as how sites interact and combine to form communities and the city as a whole.

Wellington is a folded landscape with valleys and ridges, and this means that a single large dwelling in the wrong place can adversely affect many others. Sites are often steep, with dwellings that can be three storeys on one side and one storey on the other. Small changes in how heights and boundaries are defined can have very large consequences both for those who live on a site and those who live nearby. The Plan needs to allow and adjust for this reality by adopting a more carefully tailored and locally nuanced approach, rather than a one-size-fits-all approach if it is to avoid serious and long-lasting adverse impacts in Wellington.

Planning needs to drive and encourage quality and ensure the design of new, more intensive development works with the city's idiosyncratic landscape and for the communities in which it is located. Designing with sunlight access and shading in mind; the addition (or extension) of green spaces to balance increases in density; and maintaining the comfortable look and feel of the streets where we live, work, play and learn are all essential parts of creating a great city which takes pride in its urban design. Emerging Maori urban design approaches are a vital part of this process.

LIVE WELLington wants to ensure that new builds are constructed and located so that they provide great places to live without damaging the amenity of other homes. We propose a more respectful approach to sunlight access and shade; careful protection of personal privacy; expanding the variety and location of green spaces; avoidance of heat-island effects from too much concrete and paving; and enhancing the look and feel of the streets we inhabit .

Blanket rezoning will do nothing for people in damp, mouldy homes; indeed with little emphasis on sunlight, ventilation and the location of new buildings on the landscape there is a real risk of making the problem worse.

The City has, for the last 30 years, successfully used Design Guides, with care taken to understand and strengthen the city's individual qualities of *local character* and integrate these, as part of new development, into the city's varied and valued local communities.

LIVE WELLington strongly supports the continued use of local Design Guides, founded on a sophisticated understanding of *local character*, as a proven and effective vehicle for addressing good residential quality. The draft Plan as-written downplays, and indeed excludes, the value of *local character* as a vitally important and long-established consideration for new development design.

See *Appendix 1: Quality* for more specific discussion of issues relating to urban design quality and the importance of shading.

SAMPLE SUBMISSION

SUGGESTED GENERAL SUBMISSION

I submit that the draft District Plan must more comprehensively provide for enhanced sunlight access to outdoor and indoor living areas, the addition and extension of new green space to balance increased residential densities, and strengthen the urban design qualities of the city through a more sophisticated approach to design guidance. In particular, the City Council needs to:

- *Identify core principles of good urban design based on international and local best practice and on what has already worked well in our city, and ensure the Plan enables these to be applied to all new developments, with clear support and speedy assessment processes for those proposing new developments.*
- *Develop design guides and relevant standards to enable a more granular approach to local character; access to sunlight and shade; the maintenance of personal privacy; the variety and location of green spaces; the location and scale of exterior space and development; the control of heat island effects and the look and feel of the streets we inhabit .*
- *Modify height limits, site coverage, height in relation to boundary and setbacks for side and rear boundaries so as to trigger the need for a resource consent to enable the management of effects where new developments have a more than minor impact on local character, sunlight, shading and outdoor recreation space.*
- *Modify building location and bulk standards so as to trigger a resource consent related to the location of buildings on sites and issues of personal privacy and shading within and between multiple developments on a single site so to enable management of these design quality issues.*
- *Develop block level masterplans in areas where density is expected to increase to ensure developments respond positively to their existing surroundings, manage related daylight and shading effects between individual developments and provide a minimum proportion of green recreational space accessible to residents.*
- *Retain existing provisions relating to minimum sunlight in the Operative Plan rather than replace them with the minimum daylight provisions of the draft Plan.*
- *Retain, update and enhance the city's existing design guides regime covering all the character areas identified in the existing Operative Plan and ensure that these can be applied to all new developments within these areas*
- *Develop new place-based design guides as part of community-level planning processes.*

SPECIFIC EXAMPLES

You can provide specific examples of issues relating to design quality issues to support the general points above. These add weight and specificity to your submission and will vary between suburbs and locations

One approach is to provide specific examples of recent poor outcomes, and recent good outcomes, and examples locally where good design outcomes are crucial. You can then propose specific areas where controls are needed to address one or more of the general points above.

Example 1:

Aro Valley is a narrow East-West valley. Ensuring sunlight and shading are fairly shared is critical to avoiding quality of life issues in existing dwellings. While some parts of some sites could accommodate six storeys, a single six storey building in the wrong location could shade a very large number of properties.

I submit that, rather than comprehensive upzoning, Aro Valley needs site by site consideration of these matters for each development, as is currently the case.

Examples 2:

I submit that the City Council needs to modify height limits, site coverage, height in relation to boundary and setbacks for side and rear boundaries across all areas of Mount Cook so as to trigger the need for a resource consent to enable the management of effects where new developments have a more than minor impact on sunlight and shading, personal privacy and the existing physical character of the area.

BACKGROUND

Our plans need to protect what is already good about Wellington, and ensure we evolve together rather than being mired in conflicts that have been artificially created. Wellington's liveability, and its character and heritage, can be protected at the same time as new housing is added. Not every old building needs to be retained, but neither are people's sense of connection and place disposable commodities. Rather than wholesale deregulation and the widespread removal of protections, LIVE WELLington wants heritage and character to continue to be considered as part of community dialogue, while new construction focuses first on under-utilised land.

LIVE WELLINGTON supports "living heritage" which values character and heritage and sees them evolving as our communities evolve. Experiences that matter can be shared across generations while creating space for our city's many stories to be told.

For more general discussion and ideas you can use see *Appendix 2: People and Buildings*.

SUBMISSION

GENERAL APPROACH

I submit that the draft District Plan needs to better recognise and provide for the protection of heritage from inappropriate development and better take into account the need to maintain and enhance amenity values. In particular the Plan needs to:

- *Rather than undertake broad upzoning and removal of demolition controls:*
 - *identify underutilised sites and locations that are not subject to demolition controls and are suitable for intensification within the existing character areas (as defined in the Operative Plan);*
 - *identify sites and areas within existing character areas (as defined in the Operative Plan) where more intensive development could occur without adverse effects on sunlight, privacy, heritage and local character.*
- *Amend the draft Plan to recognise that character is in part derived from heritage (as set out in the Operative Plan) in pre-1930s character areas (as defined in the Operative Plan), and use a comprehensive, holistic definition of character as a qualifying matter under the National Policy Statement-Urban Development*
- *Amend the draft Plan to recognise that character and heritage are fundamentally intertwined (as set out in the Operative Plan) in pre-1930s character areas (as defined in the Operative Plan)*
- *Retain demolition controls generally in the pre-1930s character areas (as defined in the Operative Plan) while identifying areas of particular character within these (for example as recommended in the revised Draft Spatial Plan) to enable a more granular level of control over demolition.*

- *Retain the application of area specific design guides to all new developments within the existing character areas (as identified in the Operative Plan)*
- *Clearly identify community-based planning for intensification as a method for increasing housing supply within areas subject to the revised demolition controls set out above.*

I support the provisions in the draft Plan relating to the protection and increased recognition of Maori heritage within Wellington City, and I support the introduction of design guides to ensure that these values are recognised and provided for in new developments..

I support the development and introduction of character-based design guides for specific areas of the city as part of community-based planning.

SPECIFIC EXAMPLES

You can provide specific examples of issues relating to character and heritage to support the general points above. These add weight and specificity to your submission and will vary between suburbs and locations

Example:

I submit that it is illogical to exclude Tutchin Avenue, a tiny dead-end street barely one car's width, from the Porritt Avenue character area in Mount Victoria.

There is no explanation or justification for this decision. If this exclusion is allowed to continue, a 21m (six-storey) height limit will apply and this will destroy not only the heritage of the street but also the character of areas that surround it.

APPENDIX 1: QUALITY

SUNLIGHT AND SHADING

Light is fundamental to our wellbeing, and shading is far more than simply a minor issue. Reductions in sunlight can and do affect:

- Heating and lighting costs
- Dampness
- The ability to
 - dry clothes outside
 - grow food
- Mental wellbeing

Removing the ability to address sun and shading issues on a site-specific basis poses real risks to the existing housing stock. Siting a large building to maximise sun for that building may result in a large number of other dwellings being shaded.

The argument is sometimes made that if a house performs poorly once it loses sunlight then it isn't a very good house. This does not bear scrutiny. Houses are generally designed for their site and some expectation about what will happen around them. Houses built over a hundred years ago were built to stay dry through exposure to sun and air movement. Houses today are encouraged to adopt passive solar design. Intrinsic to such dwellings, new and old, is reasonable access to sunlight.

Shading is not a necessary consequence of intensification. However limiting the ability to manage it means it will become much more likely. The requirement to assess these effects beforehand is triggered by the need for a resource consent. No consent means no assessment, and problems may arise through thoughtlessness or indifference as much as anything else.

URBAN TREE COVER

Auckland provides a graphic example of how intensification can lead to wholesale loss of urban tree cover.

The Plan can be strengthened in respect of provision of green space and the planting of trees. There is also a need to identify and protect areas of existing green space, especially in locations where significant intensification may occur.

Architect Jessamine Fraser describes clearly the impacts on overall design quality in Auckland:²

As flawed as it is, the Unitary Plan is enabling development across the isthmus. In areas like Ponsonby and Grey Lynn, where the planning maps get finer grained, highlighting ridge lines and main roads for intensification on sizeable blocks of former commercial and light industrial land, this is manifesting as generally well considered apartment building, often with commercial or retail on the ground floor. In areas like New Lynn and Glen Eden, where the planning maps turn into broad swaths of dark orange Mixed Housing Urban, with no consideration for the existing urban grain or topography, it is manifesting, other than a couple of very large projects, in erratic patches of townhouses and infill housing.

These area already have an as-of-right allowance to build three houses on a site. Such developments typically maximise the building envelope, with little consideration for the urban realm, spatial relationships, shading of neighbours', or even their own, outdoor space. The intention behind all this building is profit- not housing the homeless, nor providing affordable housing for young families. There isn't even any intentionality in design quality. It's about building and selling as fast and as profitably as possible.

As a minimum, design guides need to be targeted to specific locations and need to

manage well-known challenges of providing intensive housing, which include ensuring residents have access to sunlight, privacy, safe pedestrian access, access to nature, and practical servicing and storage. In addition, the standards do not address matters such as the street interface, with the exception of a setback rule, which are vital to ensuring a well-functioning neighbourhood³.

Each area's

unique set of circumstances needs to be considered to form its new intensive residential identity and increase its quality of life.... the nature and type of intensification must respond to its context and be place based, to generate good quality urban design.

Design quality is an essential part of a liveable urban environment. Far from being a cost, it is an investment in the future which will pay huge dividends in terms of quality of life and wellbeing. Design matters because people matter.

² <https://www.1of200.nz/articles/housing-at-any-cost>

³ <https://urbandesignforum.org.nz/2021/11/rma-reform/a-last-minute-call-to-have-a-say-2/>

WHY OLD PLACES MATTER

– CONTRIBUTED BY BEN SCHRADER, URBAN HISTORIAN

Over the last 24 months Wellington's built heritage has come under a sustained attack that's surprised and troubled many of us. Heritage has become an emblem and scapegoat for range of city ills: unaffordable housing, restrictive and officious planning practices, poor health among renters, generational warfare, Nimbyism, colonialism, and more.

A catch-cry of built heritage critics is that it is people, not buildings, that make cities what they are. This infers that a city's urban identity and sense of place arises from the people who live there and has nothing to do with its physical form. This would mean that people would still flock to places like Cuba Street even if it was made up of modern mirror glass tower blocks, rather than the whimsical, hotch-potch of different-aged structures that characterise it now.

We only have to look at the lifelessness of northern Lambton Quay in the weekend to know such a scenario is unlikely. It's more true to say that both people and buildings make cities what they are. The diverse built environments of cities, and the different ways people engage with it, is what provides urban identities and a unique sense of place. As the urban guru Jan Gehl puts it: 'First we shape the cities – then they shape us.'

It's therefore worth reminding ourselves why built heritage is important. To do this I'm drawing heavily on the work of the American heritage practitioner Thompson Mayes and his compatriot the architectural historian Max Page. In his book *Why Old Places Matter* (2019) Mayes identified 14 reasons as to why old places are important in community life. I'm going to consider six of these: continuity, memory, identity, beauty, history and architecture.

CONTINUITY

Old places provide a sense of continuity. In a world that is constantly changing, old places provide people with a sense of being a part of a continuum, which is necessary for them to be psychologically and emotionally healthy. As the architectural theorist, Juhani Pallasmaa acknowledges: 'Architecture enables us to see and understand the slow process of history and to participate in time cycles that surpass the scope of an individual life.'

This is obvious in places like Mt Victoria where we see cottages dating from the 1870s; villas from the 1890s; 1930s Art Deco apartment and 1950s Modernism. There are 19th century workshops and 20th century factories adaptively reused as apartments. There are also many townhouses dating from the 1970s up to the present. In other words, the passage of time is manifest in Mt Vic's streetscapes.

MEMORY

Old buildings serve as mnemonic aids. They are important in activating both individual and collective memory (shared by the larger society). As the American conservation architect Mary DeNadai writes: 'Old buildings are like memories you can touch.'

An personal example is the Embassy Theatre. Often when I go there, I recall earlier visits as a child or seeing Wellington film festival films there during the 1990s. This is both an individual and collective memory – in being shared by other film goers.

Memories are often contested. The history of old places may be viewed differently over time and reinterpreted as our conceptions of what is important changes. A good illustration of this is the colonial villas debate. For some they are tangible links to settler endeavours to create a prosperous city; for others they are painful reminders of the impact of colonialism on the region's mana whenua. The fact these arguments occur underscore the importance of place. Despite conflicting points of view, the place itself transcends specific interpretations.

IDENTITY

Similarly, old places are important in the construction of individual and collective identities. As the influential geographer Yi-Fu Tuan explains:

What can the past mean to us? People look back for various reasons but shared by all is the need to acquire a sense of self and of identity. ... the passion for preservation arises out of the need to for tangible objects that can support a sense of identity.

In terms of my own sense of identity, I often reference my childhood experiences of going to places like the Embassy, to explain why I still like film going. For me it's not only about the film, it's also about the place I'm watching it in.

Old places also contribute to collective identities, such as the Treaty House at Waitangi. It was deliberately constructed as national monument in the 1930s to relate the ideal of New Zealanders as one people. The process of redefining who "we" are is continuous and contested. We saw this during the 1980s when the Treaty House and grounds became a place of Māori protest. Protestors rejected the one-people discourse and shone light on the perennial failure of the Crown to honour its Treaty commitments. In this way the Treaty House became a tangible site for transforming identity.

People can survive the loss of places that support their identity. And often these places survive in memory. But the continued presence of old places helps us know who we are and who we may become in the future.

BEAUTY

As Mayes notes: '[R]egardless of how beauty is defined, people perceive and desire beauty in their lives and in their communities. And they find beauty in old places.' Old places may be beautiful for their design, but sometimes they're beautiful because of the mark of time that has been left on them – ruins have long been the exemplars of the sublime.

Feelings and opinions about beauty change over time. The history of preservation demonstrates a process of the ugly transforming into the beautiful. Victorian buildings were condemned as the worst expressions of a degraded era; Art Deco was considered commercial and hideous; industrial buildings were treated as having no architectural value; Mid-Century Modern was dated. All of these were once considered ugly and now (generally) considered beautiful.

It's always easier to save a place that people consider beautiful than a place – no matter how historically significant – that people think is ugly. The Gordon Wilson Flats on the Terrace is a good example of that. Despite its recognised national heritage values few Wellingtonians can see past its perceived ugliness.

HISTORY

The capacity of an old place to convey or stimulate a relation or reaction to the past is part of the fundamental nature and meaning of heritage objects. Many people feel the exhilaration of experiencing the place where something actually happened.

As Joseph Farrell writes: 'Old places and old things stimulate my historical imagination in a personal way - that is, in a way that is different from reading about the past ... For many, places and things are a much more effective way of being in touch with the past than reading is.'

I remember as a history student learning about the 1913 Waterfront strike. I studied a photo showing strikers gathering outside Queens Wharf with the Harbour Board office building in the background – now the Wellington Museum. When I walk past the building I sometimes imagine the events that took place there. Without the building I doubt I'd have the same reaction.

ARCHITECTURE

People love and revere historic buildings for their art and craftsmanship and for the way they make us feel. Few can feel unmoved standing in the aisle of a medieval cathedral and seeing the stone pillars rising to the heavens, or stepping into the dimmed space of a whare whakairo (meeting house) and viewing an iwi or hapu's tīpuna in the building's structure.

As Pallasma points out: ‘the significance of architecture is not in its form, but in the capacity to reveal deeper layers of existence.’ This is to say that it allows us to better understand the people who made the places and their value systems, sometimes through the symbolic and historic meanings that the places reveal. This is obviously much harder to do when the place no longer exists.

CONCLUSION

In providing a sense of continuity in a rapidly changing world, in activating our personal and societal memories; in contributing to our individual and collective memories; in providing beauty in our lives; in allowing us to see where history happened, and by enabling better understandings of the people who built them, old buildings really do matter.

It should now be evident that its buildings, as well as people, which make cities what they are. Cities are not made by people alone.