

Wellington Civic Trust

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SUBMISSION ON WELLINGTON CITY COUNCIL PLANNING FOR GROWTH – OUR CITY TOMORROW: THE DRAFT SPATIAL PLAN

The Wellington Civic Trust welcomes the opportunity to comment on the Draft Spatial Plan for Wellington, released for engagement by the Council in August 2020.

We are disappointed at the style and format of the electronic submission form which is not helpful for a group like ours (it should be possible to make a submission for a group without having to provide answers on a suburb or age of person to get past the first field). We have completed the form in a limited way in order to present our detailed submission.

The Trust

The Wellington Civic Trust was established in 1981 with the aim of helping make Wellington the best of all possible places to live and work. The trust comprises individual and business members — planners, architects, engineers, developers and citizens.

We work to:

- encourage public participation in decisions that affect our city
- ensure good planning and design to address the challenges of the future
- preserve the best of the old, but encourage new development which will enhance our city
- protect and enhance the unique character and the many natural features of the city, including the skyline, the town belt and the harbour
- encourage green space and environmentally conscious development
- develop a pedestrian- and cycle-friendly environment
- safeguard the waterfront as a public amenity
- support transport options that enhance the city and health

As can be seen, the Draft Spatial Plan sits firmly within the Trust's areas of interest.

Initial Comments

The Wellington Civic Trust acknowledges that the Spatial Plan is not a statutory document. However, it has some status in that it meets the needs for long-term planning now included in the National Policy Statement for Urban Development 2020 and it will underpin the development of the city's new District Plan over the next two years. In turn, the new District Plan will create opportunities for private and public development. The Draft Spatial Plan also includes information that will become important council policy, once finalised, and a number of useful council commitments to public and community works and developments.

The Trust considers that it is absolutely essential that the Council plans ahead for potential growth over at least the next 30 or 40 years. Lack of planning in the past has resulted in the lack of vision and provision of necessary community and State investment in transport and urban infrastructure which is now constraining decision-making and sound growth in certain parts of the city. We consider that the city cannot continue to sprawl as it has over the past century, and that it is time to focus on new and more efficient ways of accommodating ongoing needs for housing and business development.

Wellington is well-served by its Town Belt system – the result of 19th Century planning for the future. We also acknowledge the major planning steps of the 1970s and 1980s which removed the Port from the centre of the city and released Lambton Harbour as an area available for the citizens of Wellington, and of the 1990s which freed up zoning patterns in the central city and which have enabled Wellington to rapidly develop an inner-city residential sector, which had not been possible earlier. Further, we acknowledge the initiatives at the same time which limited the creation of parking areas in the central city, which put Wellington ahead of other NZ cities and supported alternative transport systems. Finally, we acknowledge that Wellington has a good history of heritage recognition and protection, which contributes to its present attractiveness and character.

It is now time for additional bold planning steps to make the city more sustainable and a desirable place to live.

We do not believe the Council should become sidetracked about arguments over the actual rates of growth. It is important to base planning on a reasonable estimate of population growth over several decades – economic downturns and disrupters like Covid 2020 are generally short-lived. Such impacts simply mean that the planning that is done now may last a little longer.

Infrastructure planning and funding decisions need to be made on the basis of assumptions that are even longer-term than the Draft Spatial Plan, and appropriate infrastructure must be put in place ahead of demand. We see the Spatial Plan as an essential management tool to guide community investment in infrastructure (including open space and community facilities).

We are also aware that the NZ Coastal Policy Statement requires consideration of sea level rise and coastal change over at least the next 100 years in all planning that is undertaken. Planning to address other natural hazards in the urban environment also needs to be undertaken on the basis of long-term risks to avoid the consequences of poor short-term planning.

Vision Statement

We consider that the Draft Spatial Plan responds satisfactorily to the 2017 City goals – compact, resilient, vibrant and prosperous, inclusive and connected, and greener. These goals continue to be relevant, and we anticipate that they will continue well into the future. Of course, the actual achievement of these goals depends on a great deal more than just the Spatial Plan.

Nature of a Spatial Plan

The documentation describes the Draft Spatial Plan as a “blueprint”. We consider that is a bit misleading. Rather than a blueprint, which people can rely on being built, the Spatial Plan, once it is finalized, will be the basis for creating opportunities which then need to be taken up within the private sector (by developers, individuals, NGOs and other groups) and by public agencies (the council itself, state agencies, infrastructure providers). It is thus a “framework” rather than a blueprint.

The Draft Spatial Plan will help guide development over decades. It cannot and should not be expected to be a vehicle for sudden and rapid change.

Further, a Spatial Plan is, by its very nature, big picture and broad brush. People should not expect to see very detailed design or development controls, environmental requirements, or even precise definition of zones and overlays in a Spatial Plan. Rather, we see the Spatial Plan as indicating long term development capacity which will need to be served by transport systems, 3-waters infrastructure, and open space which meets a range of community needs. At the same time, elements of the city’s natural character need to be safeguarded for present and future generations.

We recognize that the Spatial Plan will underpin the District Plan, and that the Council intends to consult on a Draft District Plan before the statutory processes. We support that approach.

Specific Elements we Support

In general terms, the Wellington Civic Trust supports the following aspects of the plan:

- The inclusion of additional areas in the “central city” in inner Thorndon and Te Aro, subject to careful management of design and adequate provision of open space (new pocket parks). Parts of the Te Aro area in particular remain very

low density. These areas should be encouraged to continue to develop and redevelop more intensively, and to capitalize on their proximity to the city centre (entertainment and commercial and business activities).

- Recognition of “neighbourhoods” within the central city, where differences in character should be encouraged to emerge.
- The concept of “green ribbons” restored in the city centre, and the emphasis on freedom of movement and interconnectedness within the city centre and to and within nearby neighbourhoods.
- Intensification opportunities in the inner suburbs, particularly along main transport routes
- The refinement of the pre-1930 character areas, to maintain the best of them, but easing off controls in areas which do not have high heritage/townscape quality values. This will enable gradual replacement of buildings and change in character over time with greater intensification of population within walking distance/short public transport travel time of the city centre. However, we do not consider that the areas which have been “released” from protection on the basis of character should be freed from all controls. Rather bulk, location and design control should be maintained over new development in proximity to remaining character and all heritage areas.
- The recognition of the 15 existing outer suburban centres, and policies which seek to encourage their existence as community hubs through intensification in and around them. The emphasis on Johnsonville and Kilbirnie as the areas with the greatest opportunities for intensification relating to their commercial centres is appropriate.
- Development which is better quality and more sustainable than in the past, including green infrastructure, on-site energy systems, and alternative transport systems including for walking and cycling, other forms of low-energy personal transport and public transport.
- We support containment of the city’s urban areas. Ongoing sprawl is not acceptable. The city is distinguished by its rural and natural framework and this should stay.
- We support the identification and recognition of both the Inner and Outer Town Belts, and the concept of protection of all areas with high biodiversity values throughout the city.
- We acknowledge that the council itself has made a major commitment to ongoing planning and investment in the Action Plan accompanying the Spatial Plan, and that this will be a large and ongoing volume of work for the city over the coming decades. Particularly where this work relates to local areas, we would urge the council to work closely with the communities affected.

Shortcomings of the Spatial Plan

The Trust has identified the aspects below as lacking in adequate detail in the Spatial Plan:

- Natural hazards – information is awaited on the implications of coastal processes and sea level rise. We would expect areas likely to be affected by sea level rise (including areas where access will become unacceptably limited – eg through the flooding of transport routes) to be identified as areas where no further development or intensification is allowed.
- Monitoring and Updating – it is not explained how the plan is to be monitored and updated. We consider this an essential aspect of a Spatial Plan.
- Integration with infrastructure where decisions are still pending - we acknowledge that there is uncertainty over rapid transport routes. It is essential that this gets sorted out quickly, as it will affect the development of the city and the uptake of intensification opportunities. The Civic Trust has long supported transfer to more sustainable transport systems (including safe walking and cycling) with a public transport emphasis, and much less dependency on private motor vehicles.
- The Spatial Plan lacks a framework for 3 waters infrastructure improvements. We are aware of problems in the costs of services having constrained desirable intensification in parts of the central city in recent years. Wellington Water needs to make commitments to achieving the Spatial Plan ahead of developer-driven demands, rather than lagging well behind.
- The Spatial Plan is relatively light on information on business land and management of business activities. In particular, the Civic Trust would seek to ensure that the city centre retains a strong shopping and entertainment function. Big box retailing needs to continue to be carefully managed so that it does not drain the vitality of the central city and other major suburban centres. Existing business zoned land appears to have ample capacity for business activities – albeit more intensively than at present.
- Priority areas for change. Although the Spatial Plan is about integrated planning, there is no detail on which areas will be able to intensify rapidly because they have adequate services for a greatly-increased population, and which areas are likely to be held back because of inadequate water supply, wastewater capacity, or stormwater services. We would expect some of this sort of information to have been provided, although we recognize that planning is proceeding on the 3 waters in parallel. This information would help the development community in its own land acquisition and investment planning.
- In general, while we support intensification as promoted by the Spatial Plan, we consider it is important not to lose sight of the need for intensification to be sustainable. That means adequate daylight and sunlight into living areas and open spaces, orientation for maximum solar gain and for wind management, and energy and carbon neutrality in buildings. While we recognize these aspects are already mostly incorporated in the council's Te Atakura (First to Zero) policy document, we are looking for continuing recognition of the need for these considerations to be carried through into the new District Plan.

Specific Aspects of Interest

The Civic Trust has a number of long-running specific interests which it wishes to emphasise in finalizing the Spatial Plan:

- There is an ongoing need to protect the city's existing green space, and to plan to add new diverse green and open spaces for future generations, particularly those living in more intensive development areas. We think this will become a pressing need in the Te Aro area in the relatively near future, and in other areas of medium to high density as they become redeveloped over time.
- Watts Peninsula – this area is identified in the Spatial Plan as part of the Miramar Peninsula where a community planning exercise is promoted. The Trust strongly supports this approach. The Trust has opposed the Shelly Bay development for intensive housing, and continues to be concerned on a number of grounds including adequacy and costs of servicing (including road access), sea level rise, and the proposed intensity of development which we consider will erode the natural character values of the green space which surrounds the former Defence land.
- Biodiversity – the Trust supports the way the council has approached biodiversity protection through its “backyard taonga” initiatives. We support ongoing protection of the identified areas, and any means the council develops to support owners of such taonga (initiatives similar to those for heritage buildings).
- Lambton Harbour. In many ways this is the jewel in the crown for the central city. However, it has languished due to lack of integrated planning in recent years. The Waterfront Framework is now dated and in recently has not provided adequate protection for this important area. There is relatively little multi-purpose public open space left in this area and we are concerned that there are continuing development aspirations which may appear at any time (such as the opportunism of the proposed Chinese Garden). We note that the Lambton Harbour area has been split between three neighbourhoods in the central city in the Spatial Plan – an approach which we strongly oppose. Further, neither Frank Kitts or Waitangi Parks are identified on the “Natural and Open Spaces” plan. We would like to see an item in the Action Plan which provides for specific planning for Lambton Harbour as a whole, and the recognition and protection of its two main existing open spaces and the whole of the harbour edge in this vital area.
- Demonstrating “Density Done Well”. The future of the city and its ongoing successful development for future generations relies on intensification. There have been few projects carried out in either the public or private sectors which people can look at and say: “that is what we want to see for the future”. We would like to see council/government commitment to some demonstration projects in the very near future that can give people confidence that the city can benefit from the increased intensification proposed.

Ongoing Citizen Involvement

We consider that there are major benefits from continued engagement at local level, particularly when neighbourhood centres, local open space and transport networks, and local transport facilities are to be changed, added to or upgraded. Opportunities for input or co-design should have major benefits for both the council and the community. Good ideas often arise from community involvement, so we look forward to seeing the council maintaining their policy of ongoing engagement, including at local level.

The Wellington Civic Trust would like to be heard in respect of this submission if oral hearings are envisaged. In that respect, future contact should be with Trustees Jim McMahon (027 292 4649, jim.mcmahon@caravel.co.nz) or Clive Anstey ((04) 939 2973, c.anstey11@gmail.com).

Yours sincerely,



Jim McMahon
Chair
Wellington Civic Trust
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