



ON SLOW RESIDENTS' COMMUNITY ASSOCIATION

Submission of the Onslow Resident's Community Association for the Our City Tomorrow: A Draft Spatial Plan for Wellington City

The Onslow Residents Community Association represents the areas of Khandallah, Broadmeadows and Kaiwharawhara. Our purpose is to act as a conduit between the community and local authorities, represent the views and interests of our three communities, promote, develop and improve the public services and facilities for our community and foster a sense of community. We are a voice for our community.

Overview

The Onslow Residents Community Association is pleased to make a submission on the Draft Spatial Plan for Wellington City. This is based upon discussion with our residents at two public meetings with a total of 250 residents in attendance.

We do not support the spatial plan as it is currently presented, as it is little more than a zone plan with building heights identified. It does not meet the needs of the city for affordable housing, yet would significantly damage the quality of life for residents in our suburb. We want to see greater diversity in the cities architecture, but we do not want to see a one-size fits all approach to the different character suburbs in the capital.

We also wish to make an oral submission.

We will first make some general comments and then focus on the key questions in the submission documents. Finally, we will present recommendations for action for consideration by the Council.

Limitations of the Spatial Planning Process

We believe that the spatial planning process is flawed and does not provide our residents with a reasonable opportunity to become engaged or to make submissions.

Last year's consultation on the growth scenarios was seriously flawed and is not a valid baseline for the Draft Spatial plan, because:

1. Last year's planning for growth scenarios contained significantly lower-density proposals for the outer suburbs than that contained in this year's spatial plan, i.e. "town houses and walk-ups" with an illustration of a two-storey town house in Khandallah
2. The question asked of submitters were leading questions that were biased towards preferred answers, e.g. "I support continuing to protect character *even though it means* more people will drive and produce carbon emissions."

We therefore disagree with the idea that the preferred option is up and not out.

The Covid pandemic and general election campaign significantly interfered with our ability to consult our community. Only one pop-up kiosk meeting was offered in Ngaio for the Onslow Ward. At our public meeting on 23rd September there was no representation from officials. Several residents

expressed the view they had not been notified of such a major consultation directly. Following this meeting, more residents have had to organise a second public meeting for 30th September. During a walkabout with the mayor on 2nd October, we met further residents who were unaware of the spatial plan.

This lack of formal notice to all residents has not provided sufficient time for submissions to be well thought through and made on time.

There is no formal document that describes the draft spatial plan. The plan information is contained in a computer programme hosted on the Council website. This information has changed significantly during the consultation process, with new and changed information being added throughout, and we cannot compare the new and changed information with what was published at the start of consultation.

We therefore have insufficient confidence that what is presented can be well understood by our residents prior to making a submission.

Limitations of the Draft Spatial Plan

The Spatial Plan sets out to deliver five major outcomes: our city tomorrow will be Compact, Resilient, Vibrant and prosperous, Inclusive and connected and Greener. However, in practice the only quantified information in the plan is zoning, demolition, parking and building heights. The rest comprises general statements of intent, such as “quality development”, without specific detail. Therefore no evidence of how these outcomes will be achieved is quantified in the plan.

On the contrary, the draft spatial plan is not based on accurate quantification of:

1. It's cost
2. The population growth - as the statistics are based on 7-year old data, the upper number only has a 10% probability, and the distribution has not been extrapolated from 2020 onwards, but merely shifted right to allocate a past growth projection into the future in error; a more correct total population growth range would be 8,640 to 76,560, with a most likely growth of 44,760, while the numbers for Khandallah are much lower than those used in the plan..
3. The development possible under the current District Plan. This is understated as no account has been taken of the increased density of current consenting practice and the lowest of the possible development analysis scenarios has been chosen; for Khandallah even the corrected total growth required in the plan (which we don't accept) is 1,140 dwellings, and the average of the five scenarios estimated in the HBA under the current district plan is 1,151. This demonstrates that no change to the District Plan is required in Khandallah.
4. The densification that will result from the change in heights proposed in the draft spatial plan, as all future dwellings forecasts are derived directly from the population growth required through an occupancy ratio
5. The transport required to move the additional population growth or its capacity
6. The infrastructure required to support the densification proposed, as it is only for 3-waters, is out of date, and uses lower density scenarios for Khandallah
7. The economics / pricing of the new developments, to show that such development is economically possible and will result in more affordable homes
8. The education capacity, which does not reflect that Khandallah schools are zoned and full
9. The recreational and social needs of the proposed growth, which have not been analysed against current provisions and capacities, i.e. sport, gyms, shops, open space, leisure activities, child care, dining and entertainment
10. The effects of Covid-19 in redistributing the working locations of residents, which have not been analysed, such as now requiring access to more local amenities when working from home

11. The economic development required to find employment for the proposed growth, which would determine that it is sustainable.

We support the need to find more affordable housing and to retain multi-generational communities within Wellington City. However, we find that the spatial plan contains no strategies of how this will be achieved, nor does it stage development over the 30-year period. The Spatial Plan is therefore not a plan; it is only a proposal for rule changes.

The strategy implied in the plan, as far as we can discern, is that private sector developers will use the relaxed controls to purchase existing properties, demolish them and replace them with a larger number of dwellings. It is self-evident that this will fail to deliver the primary goal. To purchase existing residential dwellings is costly, demolition is costly, building high in Wellington is costly and building limited numbers of units is costly. We suggest that affordability comes from cheap green field or brown field sites at scale and construction that uses factory-built units.

We understand that the experience of Christchurch was, that to make more affordable housing possible, significant amounts of green field land were released across the region by multiple territorial authorities, with infrastructure costs covered by central government and massive funding from insurance and government to regenerate the city centre.

The experience of the Wellington region is that merely increasing building heights, such as in the inner city, does not result in affordable dwellings and nor does allowing green field sites to be developed piecemeal at one-dwelling per section. Or put simply, capitalist developers deliver profit not social outcomes and manipulate land-banking and release of new properties to control price.

[Answers to the questions in the submissions questionnaire](#)

Answers to compulsory questions:

1. We disagree. For the central city, we understand the desire to allow heights to increase as significant sites become available. We disagree with the strategy to increase its boundaries into current residential areas to allow piecemeal development. This will significantly impact current residents. The value of their streets and properties must be retained for their benefit and should only be changed by direct sanction from them. We ask that the Council acknowledges that the inner city is everyone's town centre. We need it to be accessible, which it currently is not. We need parking services and an effective transport policy to connect it to the suburbs as well as an economic development blueprint to maintain its vitality as part of the vision for Our City Tomorrow, not just a spatial plan.
2. We strongly disagree. For inner suburbs, the scope for intensification is limited by their already dense development. We disagree with the spurious protection of current fault lines in Thorndon as these are tens of kilometres deep, so their surface impact is across entire suburbs. The Council should be doing due diligence on ground-vulnerability across the inner city, not on fault-line proximity. Current reality is that all high-rise residential development is significantly constrained by strength, foundation isolation and insurance constraints that will only get more expensive over the 30-year period. The character protection is totally inadequate.
3. We strongly disagree. For outer suburbs we will discuss the specific issues in the spatial plan for Khandallah in the next section, although these apply to Ngaio and Crofton Downs and possibly elsewhere.
4. We strongly disagree. We believe that the distribution must be staged and focused on specific areas where residents welcome the greater height and density, and that this will be close to the inner city and the major southern corridor, not in the outer suburb where residents have specially chosen a different character. Greater use should also be made of the greenfield sites and new ones should be found.
5. We strongly disagree. For character areas in the inner suburbs, we strongly disagree to reduction in character classification where properties are well-maintained, such as in

Thorndon; the entire street-scape and heritage suburb character must be protected and the building height limited.

6. We strongly disagree, as we believe that the character of the inner suburbs will be damaged and few affordable homes will be developed due to economic constraints.
7. Please see our comments about Khandallah in the next section.
8. Our only comment is that the Johnsonville heritage railway is not a rapid transit system as it does not meet the definition in the NPS-UD, see the next section.
9. We strongly disagree, as we have already stated the plan does not show how these laudable goals will be achieved.
10. We don't need to consider Covid-19 to tell what we value; it is in the next section.
11. Although not asked, we strongly disagree with the plan for developing the green field sites. It is vital to maximise the opportunity sites to create affordable housing for our City. Wellington is currently a micro-city and will remain a compact city as these are developed. In particular, the Aotea and Whitby style of development is shameful as it does not promote inclusiveness, diversity or vibrancy, and it pollutes the environment. As previously stated, we believe last year's consultation was seriously flawed. We urge the Council to see the primary opportunities for achieving affordable housing through these sites as well as large brownfield sites that may exist elsewhere. Therefore new opportunities need to be addressed. Specifically, we ask that the Council takes a unified planning approach to these large sites and requires that diverse housing of similar densities to those in the rest of the city, with corresponding amenities and connectedness, are achieved in a sympathetic way. As the Council believes there is significant demand for greater heights and densities, then planning these from scratch will attract buyers and deliver inner-suburb style vibrancy, which residents choose rather than have imposed on them against their choice, for example at Hobsons Point in Auckland. By leveraging central government funded infrastructure the development of the City can follow that of Christchurch's redevelopment at affordable cost to the Council. By doing this the Council can forecast a significant increase in the number of dwellings achievable across the 2,600 sections as well as find more sections elsewhere.

Specific submission on Khandallah

Khandallah is characterised by being one of the premier suburbs in Wellington for character and value through its highest amenity status, as found in the DLC expert testimony last year. In particular, its residents value:

- Its green open spaces and connectivity to large areas of reserve and native bush
- The vistas across the suburb's hills from every street
- Its large setbacks and partial frontages that bring the greenery of its gardens into every street scape
- The sunlight, quiet and privacy afforded to most dwellings
- Its recreation and cultural facilities, medical centre, library, pharmacy, supermarket, town hall, schools, sports and social clubs.

Current concerns among residents include:

- Road safety at key junctions
- Parking along key transport corridors
- Congestion from motorway overflow and at school times
- Lack of transport dependability of buses and trains
- The ageing of the village centre requiring sympathetic development.

Many residents believe that Khandallah is heritage in the making, with numbers of families having invested over generations in its development to make it what it is today. Khandallah is not merely a stopping place on the journey of life, it is our turangawaewae, our place of belonging.

In this context, the wholesale removal of shading protection, reduction in set-backs, increase in site coverage, increase in built frontage, reduction in mature vegetation and masking of outlooks implied to allow the significant density and height increases in the spatial plan are unacceptable.

The assertion that our heritage branch railway is a rapid transit system is simply ridiculous. Its layout has changed little since it was built in 1879 and it was found to be obsolete in 1937 due to its single track, steep gradient, tight curves and narrow tunnels, none of which have been substantially altered in the years since. The reality is that over the week, the trains run 2-3 times less frequently and take 50% longer in time than the buses. Given the buses already run on dedicated bus lanes to the south of the city that could be extended to the North, they are the real rapid transit system to Johnsonville. Yet they are not designated as such in the draft spatial plan. In any event the heritage railway capacity cannot be extended to meet the Council's target by more than a nominal amount.

There is no case whatsoever of more than 3-4 storey development in Khandallah. This should be with the walk-ups and town houses proposed last year, with sympathetic protection of the suburb's outstanding character and value, through careful planning on a location-by-location basis in conjunction with and reviewed by the local community.

The search for affordable housing in Khandallah is a pipe dream due to its high property prices and difficult terrain, as we demonstrated on the Mayor's walkabout. The plan's focus should be to provide sympathetic development of a greater variety of property that supports multi-generational families continuing to invest in the amenity of the suburb, particularly in the central village area.

What we like about the Spatial Plan

We like the goals of the spatial plan, but we don't see any evidence that the material content of the plan, its zoning and height limits and reliance on private development, will achieve these goals.

Recommendations

We offer the following recommendations to the Council:

1. That Council amends the 50,000 – 80,000 population growth figure to the most likely figure as required by the NPS-UD, using the calculation we identify in our submission.
2. That the Council completes the pre-work required for a spatial plan to show that it is economically, politically and socially feasible and will deliver the outcomes the community wants across all areas of wellbeing, including infrastructure, transport, education and amenity.
3. That Council take a measured and staged approach to the planning of developments because of their impact on character, amenities and health and safety.
4. That Council amend the maximum build height in the plan for inner and outer suburbs to three storeys and only higher if one storey can be built into the terrain.
5. That the spatial plan should maximise the building of affordable housing in major green field and brown field sites due to the economic constraints of development in our capital city
6. That no high storey apartment blocks be consented as in-fill development because they will infringe on the character, streetscape and create parking issues.
7. That the Council pushes back against the NPS-UD requirement to remove off-street parking requirements as these have been rescinded in overseas developments, and instead that it fulfils its obligation under the NPS-UD to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.
8. That it become mandatory for Council staff to notify all residents of the street and adjoining streets if and when an application is made for a multi-storeyed apartment
9. That the Council adheres strictly to the District Plan and no longer accepts "less than minor" clauses in applications to circumvent its own guidelines.

10. That the Council engages in joint planning with the Architects and local community residents to formulate and define quality development for each suburb.

Conclusion

Thank you for the opportunity to make a submission. We will also be sharing this submission with the residents in the affected areas as well as in ORCA's communications with its members. Please feel free to contact our association at onslowcommunityassociation@gmail.com or by phone on 021 750 633 regarding this submission.

Yours sincerely

Lawrence Collingbourne, President on behalf of

Onslow Residents' Community Association