

Submission Guide: Wellington City Council Draft Spatial Plan

This guide has been prepared by Mt Victoria Historical Society to assist people in making a submission to the Council on the Draft Spatial Plan.

The most important thing is to put in a submission. Numbers count! It doesn't have to be lengthy or involve in-depth research.

Deadline for submissions is 5pm on Monday, October 5th.

The guide is in two parts: Part 1 – some pointers on what you might consider including in your submission, and Part 2 – the process.

Part 1 – Content suggestions

The following are the issues Mt Victoria Historical Society believes are the most important issues to provide feedback to the Council on.

We encourage you to select those that accord with your views, put them in your own words if you have time, and also to add a personal perspective and your own experiences.

1. We are concerned about the process of developing and consulting on the Draft Spatial Plan. It appears to have been rushed or sloppy, to the extent that different versions have been produced without notice to stakeholders, information has been difficult to access, questions about errors and differences cannot be answered by Council officers.
2. The statistical analysis underpinning the plan is erroneous and numbers used are unrealistic. (See the paper on our website for more detail.)
3. The amount of housing required is consequently unrealistically inflated. It has been designed to meet the highest possible growth in population, which is not feasible. Almost all the additional housing required could be built under existing rules. It is a 30-year Plan but requires development in heritage areas from Day One, which may never be needed.
4. We are not against more housing or more affordable housing but such development should be
 - a) phased, so that it first takes place in areas which need regeneration e.g. Adelaide Road and Kent Terrace
 - b) actively planned rather than *laissez faire*, so the Plan does not give rise to low quality, inappropriate development in the wrong places

Building 4-6 storey apartments in Mt Victoria is unlikely to provide affordable housing and will, in fact, expel the many young people currently occupying the large houses currently divided into multiple flats

5. Removal of the pre-1930s restricted demolition rule from the whole suburb (i.e. there will be no requirement to seek a resource consent to demolish a pre-1930s building outside a 'character sub-area' and then to build 3-6 storeys) will quickly lead to the loss of an essential part of Wellington's identity. The historic housing stock of Mt Victoria and its unique form are used to promote Wellington, not least by Wellington City Council. The suburb is visited and appreciated by New Zealanders and international tourists.

6. Layers of Wellington’s history can be told and reimagined through the houses that still exist. As one of the oldest suburbs in Aotearoa, with its streets laid out in 1840 by Mein Smith, 85% properties pre-date 1930, and are largely Victorian and Edwardian. This means generations of people and businesses who have helped make Wellington what it is. It is part of our collective culture.
7. The plan is full of inexplicable inconsistencies, indicating that it is not really based on heritage or character. To give just a few examples of many:
 - the omission of Tutchen Avenue in the middle of the Porritt/Armour/Albany character sub-area
 - the exclusion of lower Ellice St (see 2017 Heritage Study and the 2014 Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal),
 - the inclusion of half of Brougham Street in a ‘character sub-area’ while the other half – containing a District Plan listed heritage building, 3 houses built c1869 and an area of remarkably original housing – is excluded
 - the removal from ‘character sub-areas’ of the ends of streets e.g. Queen Street on Brougham Street and the end of Porritt Avenue with Kate Edgar’s house (first woman in the British Empire to gain a BA and the first in NZ to get a university degree).
8. Building as-of-right 3-4 storeys, mixed-use outside ‘character sub-areas’ and up to 6 storeys, mixed-use, in some areas will destroy the heritage and amenity values of much of the remaining 38% of the suburb. It is not possible to remove the demolition restriction from 62% of Mt Victoria and retain the character of the remainder. Building 4-6 storey buildings with potentially full-site coverage alongside ‘character sub-areas’ will also destroy the character of those sub-areas, despite the fact that they retain some level of protection. Many existing houses will also lose all sun.
9. The 8-storey building height permitted on Hania St (which, with Council officer discretion, could be even higher), completely blocking all sun from the Victorian cottages.
10. Many of the large Victorian and Edwardian villas contain several flats, housing a lot of young people. If they are demolished, it is very unlikely affordable housing will be built in their place and these tenants will lose their accommodation.
11. The “character” of Mt Victoria comes from the heritage nature of its predominantly Victoria and Edwardian housing. The suburb should be designated a heritage area.

Part 2 – Process

- **Deadline for submissions is 5pm on Monday, October 5th.**
- Submissions can be made:
 - online using the Council’s template <https://planningforgrowth.wellington.govt.nz/your-views/consultations/draft-spatial-plan/info-and-privacy-statement?consultation=12535>
You can also attach a document to this questionnaire at the end.
 - using the Council’s hard copy form https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0015/14226/J010987-Spatial-Plan-Submission-Form-Proof6.pdf
 - written following your own format in an email or document.

- If not completed online they can be:
 - emailed to planningforgrowth@wcc.govt.nz (Subject line Submission on the Draft Spatial Plan)
 - posted (free) to the address on the hardcopy form
 - delivered by hand to 113 The Terrace, Level 16.

- Essential details to include are name, email, address and whether you are making the submission on behalf of an organisation or as an individual

e.g.

This submission is made on behalf of an individual: Joe Bloggs, [email address], [address], [phone number].

*This submission is made on behalf of an organisation, **XYZ Inc.***

It is an incorporated society with the aims of researching and sharing the history of Wellington and promoting interest in, and preservation of, its unique heritage.

Contact details: Joe Bloggs, Convenor

[email address]

[phone number]

- A submission covering some of the detail below may not easily fit into the Council's forms, so we suggest either bypassing the form and sending it as a document/email, or attaching an additional document to the Council's form.