



October 5, 2020

Wellington City Council  
P O Box 2199  
Wellington 4140

## **Submission on the Draft Spatial Plan**

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This submission is made on behalf of an organisation, **Mt Victoria Historical Society Inc.**

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

Contact details: Joanna Newman, Convenor

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As appropriate to our mandate, this submission focuses on aspects relating to Mt Victoria and its heritage.

## **PART 1: INTRODUCTION**

### **1. Summary Position**

- 1.1 We believe the Council's underlying population forecasts are exaggerated, and so the number of new dwellings that will be needed in future is as well.
- 1.2 We call on the Council to designate the whole of Mt Victoria as a heritage area and for the pre-1930s demolition rule (or something similar) to continue to be applied across the whole suburb.
- 1.3 We believe that the housing typology applied to the majority of Mt Victoria, excluding the Kent Terrace border, should be Type 1. This is what fits most appropriately with existing pre-1930s buildings.
- 1.4 Intensification should be phased, with changes in height controls introduced only as blocks of new capacity are actually shown to be needed, with more fundamental reviews at, say 10 and 20 years, to see how demand has been met. This would mean that the heritage of Mt Victoria does not need to be destroyed from day one for capacity that may not be required.

- 1.5 The process has been badly managed, with documents unavailable in an accessible form, new documents being added throughout the process until just over a week before consultation ended, and documents constantly changing – all without notification. We submit that a new scheme for Mount Victoria needs to be developed, based on an expanded set of qualifying matters and that the Council complete a design for this in close consultation with affected stakeholders, while also completing a draft evaluation report in support of it.

## 2. General

- 2.1 We are not opposed to intensification or increased development of affordable housing. We understand the need for the city to accommodate more people in a sustainable way.
- 2.2 We do not accept, however, that the removal of heritage protection in Mt Victoria or other areas with heritage housing stock is required to achieve the Council's goals of providing sufficient housing in Wellington.

There are, for example, significant areas of Te Aro, Adelaide Road, Kent and Cambridge Terrace, and Thorndon Quay that could be developed for housing before any requirement to even consider destroying the valuable heritage precincts of the city.

- 2.3 As WCC's own statistics show, Mt Victoria is already a medium density housing area - in fact relatively high for a residential suburb. It is the third-most densely populated inner suburbs (after Mt Cook and Newtown West) despite over half of its area being Town Belt, three schools and Government House.

To increase the quantity of housing in this suburb would make it statistically high density, which would completely destroy its character and the qualities of life which help preserve that character.

- 2.4 Mt Victoria has already suffered from poor planning decisions. We would press for greater adherence to the heritage protection rules in the current District Plan and strengthening of rules in future.
- 2.5 There is considerable strength of feeling among Mt Victoria residents – tenants as well as landowners – about the proposed changes. This strength of feeling is evident in the number of signatures on our petition calling on Wellington City Councilors & Mayor to reject the Spatial Plan proposal and retain the pre-1930s demolition rule for all of Mount Victoria, a copy of which is attached as Appendix 2.

## **PART 2: SUBSTANTIVE ISSUES**

### **1. Forecasts underlying the Spatial Plan**

- 1.1 The numbers underpinning the proposed density maps are highly questionable, to the point of being misleading. The NPS-UD July 2020 in Section 3.24, 5(b) says that the Council must “identify which of the projections are the most likely in each of the short term, medium term, and long term”. On page 22 of the Council’s HBA<sup>1</sup> it states that it believes the “the Forecast.id projection [i.e. the medium forecast] is a more accurate predictor of likely growth for Wellington City over the long term”, and the high-growth forecast is 74,484, and yet The Council has consistently stated in the Draft Spatial Plan and in promotional material that it needs to plan for an increase of 80,000 people over the next 30 years.

MVHS argues that WCC has not shown there is a material shortfall in housing capacity over the next 30 years (under the current rules), sufficient to justify removing the pre-1930s non-demolition rule to provide for intensified development.

- 1.2 Furthermore, on September 25, the Council issued a new document. Where the Draft Spatial Plan document says that the inner-city suburbs must accommodate 14,000 people and 4100-5400 additional dwellings over the next 30 years, Council believes the spatial plan will deliver only an additional 1083-1895 dwellings.<sup>2</sup> Although the new estimates use different assumptions, so they are not directly comparable, it is clear that variations in the modelling can have a dramatic effect on the results.

Three to six new dwellings per annum for Mount Victoria can clearly be met under the current rules – the equivalent of the suburb’s share of the total for the inner city that is projected.

- 1.3 There is a widespread view that the Council’s work is lacking in rigour.

We call on this Spatial Plan process to stop now and for the Council to go back to the drawing board to get the basics right, using much wider consultation and expert input.

### **2. The value of Mt Victoria’s built environment to the city**

- 2.1 The built form and heritage of Mt Victoria are too important to Wellington’s identity to lose. And, it would be lost, if the protection of its character were to be removed.

Of all the historic areas in Wellington, this is the one most visible to all visitors, national and international. It is the backdrop to a high percentage of images promoting and defining the city, as shown in both the New Zealand and French tourist publication examples below.

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<sup>1</sup> [https://planningforgrowth.wellington.govt.nz/\\_data/assets/pdf\\_file/0015/3282/Wellington-Regional-HBA-Chpt-2-Wellington-City-Council.pdf](https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0015/3282/Wellington-Regional-HBA-Chpt-2-Wellington-City-Council.pdf)

<sup>2</sup> See Appendix 1 for our detailed analysis.



In April and May 2019, 1,372 people made a submission on the WCC Planning for Growth Survey. The council feedback summary noted “adamant opposition to character loss was expressed in around 200 comments with the main sentiment being that the essence of what makes Wellington a great city would be lost if character was not protected”

- 2.2 To help preserve the heritage of Mt Victoria and Wellington, we believe that new building within the overall ‘character’ area of Mt Victoria should be restricted to Type 1 of the Draft Spatial Plan housing typology.
- 2.3 The potential for further promotion of its heritage to Wellingtonians and visitors is strong. It has been the home to many famous or well-known figures (e.g. Bernard Freyberg, Kate Edgar, William Waring-Taylor) and their original homes are still standing.
- 2.4 We also believe it is important that views of this suburb (and the Town Belt) are not blocked by a wall of multi-storey buildings along Kent Terrace, and the character of the Kent/Cambridge Terrace is not destroyed by creating a shaded wind-tunnel.

### 3. Heritage not character

- 3.1 We call on the Council to designate the whole of Mt Victoria as a heritage area and for the pre-1930s demolition rule (or something similar) to continue to be applied across the whole suburb.
- 3.2 Mt Victoria is one of the oldest suburbs in Aotearoa, laid out in Mein Smith's 1840 plan for the city. Its 'character' derives in particular from the heritage of its Victorian and Edwardian housing stock. 85% properties pre-date 1930, 90% of these categorised as primary and contributory<sup>3</sup> (38% and 52% respectively). It has a number of houses built in 1869 – some of the earliest extant dwellings in the city.

But more than buildings representing the architecture of a certain period, these are 'living' reminders of the people who have built our city: labourers, small and prosperous businessmen, temperance leaders, educators and brilliant men and women, workers for their churches and social causes. Many of these layers of history behind the façade of a house are already known: many more are yet to be told. It can be visualised and understood by walking through Mt Victoria.

Once this heritage is gone, it is gone forever. It is not just character, as represented by a gable shape.

### 4. Flawed application of NPS-UD 'qualifying matter'

- 4.1 The Council Strategy and Policy Committee paper of August 6 explained:

*The proposed approach to pre-1930s character protection in the inner suburbs meets the criteria of a 'qualifying matter'. This is because a site-by-site assessment of the existing character in these areas has been undertaken which the proposed approach is based on. Without this, a significant amount of the inner suburbs would be captured by the broad requirement to enable building heights of at least 6 storeys within a walkable catchment of the Central City.*

The "site-by-site assessment" referred to was initiated with the Boffa Miskell Pre-1930 Character-Area Review.

- 4.2 In relation to this report, we would comment:

- It lacks depth and, taking a streetscape-based approach to individual houses and collections of houses, is wholly inadequate as a means of understanding the heritage values of those streets. It demonstrates no recognition of the role that historic and social values play in understanding the heritage values of streets, subdivisions or the entire suburb.
- The report's conclusions, particularly as they are laid out in the maps in the appendices, are very broad-brush and avoid any particular conclusions about the value of the Mt Victoria Character Area except for Appendix 4, Figure 8, 'Indicative Character Contribution Sub-Areas: Mt Victoria', where areas are explicitly labelled either primary/contributory or neutral/defective. (There are also areas left blank, without explanation).

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<sup>3</sup> Boffa Miskell Pre-1930 Character-Area Review 23 January 2019

- While the general conclusions reached about the value of the so-called neutral/defective areas might be roughly accurate from a streetscape perspective, these areas make up only a small part of the suburb. The implication therefore is that everything outside of this has heritage value.

4.3 In light of this, the Spatial Plan seems to relate only superficially to the conclusions reached in the Boffa Miskell report. The disconnect between the two is alarming, given that we have been repeatedly told that the Spatial Plan was supposed to be based on the conclusions reached in that report. The Spatial Plan offers such a dramatic change to the built environment that we question why there is no explanation or justification for this, given the importance and significance of the change.

To the extent that it takes account of the Boffa Miskell report, the Spatial Plan simply expands on those areas identified as neutral or defective in that report and creates much larger areas for intensification. It is a crude approach, completely lacking in nuance, and it means that important heritage streetscapes will eventually be destroyed by intensification. Some of the consequences of this are described below.

4.4 Under the NPS-UD Section 3.33, 3 b) a matter is not a ‘qualifying matter’ unless it: *includes a site-specific analysis that:*

- (i) *identifies the site to which the matter relates; and*
- (ii) *evaluates the specific characteristics on a site-specific basis to determine the spatial extent where intensification needs to be compatible with the specific matter*

We do not believe that the Draft Spatial Plan ‘character sub-areas’ meet this requirement and that designating the suburb a heritage area is more justifiable and sound (see 6 below).

4.5 We also submit that the list of qualifying matters needs to be expanded to include:

- **Heritage:** It is important that heritage and not just “pre-1930s” character is included, as heritage is listed under RMA s6(f) as a matter of national importance, and so a qualifying matter that is more readily substantiated in response to NPS requirements. Pre-1930s character is just one aspect of heritage.
- **Shape and Form of Buildings:** Even where buildings do not exhibit heritage qualities, if they are of a similar form and scale to neighbouring heritage structures, then the suburb is more cohesive and heritage can be better sustained.
- **Views from the City:** The integrity of Mount Victoria’s built environment is critical to the maintenance of the iconic views from Wellington city of the suburb.

## 5. Character sub-area problems

5.1 There are streets that contain important heritage but only on one side. However, because the other side of the street has less authenticity or homogeneity, the whole street is excluded from protection. A good example of this is Lipman Street, the east side of which is near intact.

5.2 Streets and collections of houses of heritage value that will be threatened by this plan in Mt Victoria include (but are not limited to):

*South and central Austin Street and associated side streets Rixon Grove, Westbourne (east)*

Although parts of Austin Street have been affected by townhouse and apartment developments from various eras and it therefore does not have a contiguous heritage streetscape, it still contains clusters of important single and two-storey houses. There is also much of value remaining in eastern Pirie Street, Rixon Grove and Westbourne Grove. These no-exit streets have a particular character that is derived from having no through traffic, low-scale cottages and villas and a proximity to the Town Belt.

*North Austin, Majoribanks, Port and Stafford Streets, Earls Terrace and Vogel Street*

The presence of pockets of newer houses and larger apartment complexes in this area is presumably the reason why it has been proposed to be stripped of protection, but again this area contains no-exit streets with a particular character, which is also partly derived from the hillside locations they occupy and the backdrop of the Town Belt.

*Central and south Brougham Street plus intersections with side streets*

The exclusion of this area, with a few exceptions, is difficult to understand. There are intact stretches of heritage housing on both sides of the street; there is a Council District Plan-heritage-listed building (former Crossways); there is the recently restored 1869 Carroll house; and important side streets (or parts of) are excluded, including, inexplicably, the corners of Queen and Elizabeth Streets. Within this area are many 19<sup>th</sup> century houses, some with relatively high integrity.

*Ellice and Paterson Streets*

Again, the exclusion of these streets, which contain stretches of heritage housing, some dating from as early as 1869, is hard to fathom. Lower Ellice Street was identified as a significant heritage area in the Wellington City Council Mt Victoria Heritage Study, June 2017. (See also 6 below). There are specific groups of houses and notable individual houses included in these streets. Some of those precincts only occupy one side of the street and in the case of Paterson Street, there is only one side extant. These factors should not be disqualifying.

- 5.3 There are completely illogical exclusions from character sub-areas, such as Tutchon Avenue in the middle of the Porritt/Amour/Albany Ave area. This small dead-end street, with mostly original housing (including the home of last harbour pilot to live in the pilot's cottage at Worsley Bay, William Shilling, who lived there for over 40 years before he died in 1939). This is designated for "3-4 storey apartment buildings, may be mixed use". This is a complete travesty from a heritage and a town-planning perspective.

## **6. Legal precedent for recognition of Mt Victoria's historic heritage**

- 6.1 The Basin Bridge Inquiry and the following successful High Court Appeal concluded that the southern end of Mt Victoria – essentially Ellice and Paterson Streets - is a significant part of the historic heritage of Wellington.

The High Court Decision<sup>4</sup> concluded that the Board of Inquiry did not err in recognising 'a "wider heritage area" which it considered could be affected by the Project, which stretched from Taranaki Street in the west through the Basin Reserve and Council Reserve areas to Government House and the Town Belt in the east' [para 339] and that 'The

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<sup>4</sup> IN THE HIGH COURT OF NEW ZEALAND WELLINGTON REGISTRY, CIV 2014-485-11253 [2015] NZHC 1991, July 2015

*cumulative adverse effects of dominance and severance caused by the proposed transportation structure and associated mitigation structure in this sensitive heritage precinct, particularly on the northern and northeastern sectors of the Basin Reserve Historic Area setting.' [para 340, our underlining].*

In addition, the High Court Decision stated:

*[381] In seeking to identify from the Board's broad review the interpretation which the Board placed on s 2, there are three paragraphs which I consider are particularly instructive:*

*... [557] The protection given by Section 6(f) extends to the curtilage of the heritage item and the surrounding area that is significant for retaining and interpreting the heritage significance of the heritage item. This may include the land on which a heritage building is sited, its precincts and the relationship of the heritage item with its built context and other surroundings.*

*... [615] In defining historic heritage, the RMA makes a clear distinction between historic sites and historic heritage. At their conferencing, the experts drew attention to the definition of historic heritage in the RMA – which includes (b)(iv) surroundings associated with the natural and physical (historic heritage) resources.*

*... [623] We agree that we are obliged to consider the effects on historic heritage and that historic heritage includes not only built heritage but the surroundings and setting in which the built heritage exists. In our view, the explicit focus of [NZTA], Wellington City Council and Heritage NZ heritage assessments on built heritage, as distinct from historic heritage, unduly limited the scope of those assessments.*

- 6.2 The above provides a clear legal opinion and precedent for southern Mt Victoria being an area of historic heritage, which should therefore be a “qualifying matter” that exempts it from the requirement under the NPS-UD to allow buildings up to 6-storeys in height.

Furthermore, if this character is recognised for southern Mt Victoria under the RMA, then it should apply to the entire suburb.

## **7. Kent Terrace and the border of Mt Victoria**

- 7.1 We appreciate that Kent Terrace is an opportunity for intensification, with car-yards in particular being an inappropriate land use.

We do not, however, believe building up to 8 storeys is appropriate. This is in the transition zone to Mt Victoria and the Town Belt, so a more appropriate height would be 6 storeys. This would also help preserve the open boulevard aspect of Kent/Cambridge Terrace and the Canal Reserve.

On the eastern side of buildings fronting Kent Terrace, 4 storeys would be appropriate.

On the eastern (hill) side of Hania Street, buildings would preferably be Type 2, 2-3 storeys terrace-type housing in order to preserve the amenity and heritage of the very significant Moir Street character sub-area.



- 7.2 Other areas of Mt Victoria which are designated “Central City” which, for transition zone reasons, should particularly not be built up to 8 storeys are:
- the west side of Lipman Street
  - the corner of Roxburgh/Majoribanks Street to Fallowfield Ave
  - the east side of Home Street

## **8. Amending ground level open space and recession planes controls**

- 8.1 We are very concerned to read of the vague description in the Draft Spatial Plan of proposals to amend “specific residential controls such as ground level open space, and building recession planes to enable sites to be more efficiently developed.” This potentially gives residents of these new builds no amenity, but also destroys the amenity of existing residents on all boundaries. In an example of this currently under construction in a Mt Victoria character sub-area, there is not a square metre of open space on the property. Covering an entire property with building or concrete is also not environmentally sound.

## **9. Phasing**

- 9.1 The potential over-estimation of housing requirements by the Council, coupled with post-COVID uncertainty and potential government intentions to move functions out of the central city (Dominion Post 29.9.2020), suggest that a sensible way to plan for intensification would be to phase it.
- 9.2 Renewal and new building currently takes place at a rate capable of more than meeting the numbers required by the Council’s latest calculations to satisfy Mount Victoria’s allocated share of planned growth. At this moment, eight new dwellings are under construction in character sub-areas, replacing two.
- 9.3 In other words, heritage suburbs should not be opened up for developer-led intensification until the need is proven. While the NPS requires sufficient capacity to be identified for the coming 30 years, it does not require that all of this be made available immediately. Only what it defines as ‘short term’ capacity – that required in the next 3 years – needs to be available at any one time. As one block of such capacity is nearly used up, more can be made available as there is evidence of need. And if the early blocks of capacity are targeted at areas that are a priority for redevelopment, this will protect heritage areas meanwhile. If subsequent reviews in, say, 10 and 20 years show that housing demand cannot possibly be met without seriously compromising Mt Victoria, a revision of the general plan for Mount Victoria can be undertaken in light of such evidence.

## PART 3: PROCESS

1. The Draft Spatial Plan is subtitled an “Integrated Land-use and Transport Strategy” but it is effectively only a housing density plan. It has no mention of a transport strategy other than that housing intensification should take place close to “a future mass rapid transit route”. No “future mass rapid transit route” is shown on the maps.
2. The consultation process has been unacceptable. It does not meet the standard expected from local government consultation for such an important issue as the future of the city for the next 30 years. Evidence of this includes:
  - 2.1 The Council had clearly not done enough research or preparation before putting documents out for consultation. Throughout the process it has issued new or amended documents without public notice, even to those signed up to the official Planning for Growth ‘newsletter’ since July.

A table showing the changes in documentation of housing typologies for Mt Victoria is used here as an example:

Housing Type	Full DSP 11 August	Summary DSP 11 August	Summary DSP 25 August	Mt Victoria Oriental Bay Map version 2	Mt Victoria Oriental Bay Map version 3 Sept 10
1	1-2 storeys detached, semi-detached infill housing	1-2 storeys detached, semi-detached infill housing	1-2 storeys	1-2 storeys detached, semi-detached infill housing	1-2 storeys detached, semi-detached infill housing
2	2-3 storeys terrace type housing	2-3 storeys terrace type housing	2-3 storeys	2-3 storeys terrace type housing	2-3 storeys terrace type housing
3	3-4 storey apartment buildings	3-4 storey apartment buildings, may be mixed use	3-4 storeys	3 to 4 storey apartment buildings	3 to 4 storey apartment buildings, may be mixed use
4	At least 6 storey mixed use and apartment buildings	Mixed use and apartment buildings up to 6 storeys	<u>Type 4a</u> Up to 6 storeys	<u>Type 4a</u> Up to 6 storeys mixed use & apartment buildings	<u>Type 4a</u> Up to 6 storeys mixed use & apartment buildings
			<u>Type 4b</u> Enable at least 6 storeys	<u>Type 4b</u> Council must enable at least 6 storeys, as per the NPS-UD 2020	[removed]

- 2.2 The housing typology map for Mt Victoria has contained a misleading error through all three versions and several rounds of correspondence with council officers did not succeed in providing an adequate explanation or a correction. Colouring on all versions of the map shows Tutchon Avenue included in a character sub-area but officers repeatedly confirmed it was not. There were clearly two opportunities when this could have been corrected as new versions of the map were issued.
- 2.3 The Council has misleadingly spoken and written about needing to provide accommodation for 50,000 to 80,000 people over the next 30 years, when its own highest forecast is for 74,484. This is a material difference. For Council to knowingly inflate numbers in publicity or in other public forums is irresponsible.
- 2.4 The process has been so mismanaged and shoddy that residents trust in the Council to manage it well has been shaken, while the expected transparency has not been forthcoming.

This, added to the well-researched submissions the Council will no doubt receive, should result in a radical re-write of the Draft Spatial Plan and, possibly even, a reset for the whole strategy.

We therefore do not want to see submissions just ‘taken into account’ behind closed doors before publication of a final Spatial Plan without further engagement. We submit that a new scheme for Mount Victoria needs to be developed, based on an expanded set of qualifying matters and that the Council complete a design for this in close consultation with affected stakeholders, while also completing a draft evaluation report in support of it. These documents need to be prepared well in advance of any consultation on proposed revisions to the district plan.

We call for all submissions to be made publicly available, in an accessible manner.

- 2.5 We were advised that there would not be public hearings for submissions on the Draft Spatial Plan and are therefore not requesting this right in our submission. We are disappointed that, unlike most Wellington City Council consultations, there is no opportunity for citizens to speak to their submissions at hearings.

## Population Forecast Analysis

This Appendix is largely the content of a paper presented to the Council Strategy and Policy Committee meeting on August 6, 2020.

### Key Points

1. All the figures we use below are from the Housing and Business Development Capacity Assessment (HBA), Forecast.id or Statistics NZ.
2. The “Housing Sufficiency” table (see Table 1 below) summarises the key inputs in arriving at Housing (Sufficiency) or the Shortfall/Surplus of Dwellings in Wellington City, which determines what additional capacity may or may not be needed.
3. Population Growth is a key driver of the outcome. The HBA assesses demand for residential dwellings based on two growth scenarios – a “Medium Growth” projection produced by Forecast.id and a “High Growth” projection from Statistics NZ.
4. We conclude that using the Higher Growth projection is not valid:
  - a. The High Growth figure of 74,484 is a very unlikely scenario in statistical terms. In fact, it is as likely to occur as “low growth”, which is circa 20,000.
  - b. The HBA states that the primary reason for using High Growth is that “parts of the Wellington region have been growing at faster rates than expected over recent years” (see Table 2 below).
    - The rate of growth in Wellington City has ebbed and flowed over the last 23 years with periods of higher growth (shown in blue – greater than 1%) and lower growth (shown in green - less than 1%). The lower growth years have outnumbered the higher growth years by 13-10. While there has been a recent period of higher growth, the last two years to 2019 have in fact been a period of population loss. It is also worth noting the higher period of recent growth 2014-17 cited is likely, in expert opinion, to have been a temporary phenomenon related to high levels of migration into the country.
    - Additionally, Policy PC1 of the National Policy Statement (NPS) requires that an oversupply is provided to account for uncertainty in demand and in supply being available, i.e. margins are built into both the demand and capacity numbers to help ensure that there is more than enough capacity to meet demand. It is therefore unnecessary to incorporate a higher growth projection as the NPS methodology provides the necessary margins (see Table 1).

**Taking the Statistics NZ medium population growth figure of 46,766, equating that to Housing Demand (adjusted figure of 24,929) and deducting the Housing Capacity (adjusted figure of 20,294), there is a shortfall of 4,635 dwellings over 30 years or just 153 dwellings per year, city wide.**

5. The reason for such a low shortfall is that the analysts have calculated there is already capacity for 20,294 dwellings under existing rules i.e. “the population is growing and they will need to be accommodated but provision already exists to satisfy most of this demand”.
6. The planner’s riposte to this might be that in the inner-city areas there is greater demand for what they call “terrace housing” and apartments so, even though the shortfall is only 4,635, there is a high demand for terraced housing/apartments. However, looking at a breakdown of the Forecast.id “medium growth” population projection (see Appendix C), the majority of the increase in population – i.e. 83% - is from a natural increase in the population (not external/internal migration). This is unlikely to be the demographic looking for apartments or terrace housing.

## Summary

- Does Wellington City have sufficient feasible residential capacity that will be realised over the next 30 years to meet expected population growth to 2047?

No, it does not, but the shortfall is minor.

- Yet it appears from Summary Spatial Plan that the Council is planning to provide an enormous amount of additional capacity from the outer suburbs, central city to the inner-city heritage or “character” areas.

We question why all this additional capacity is being created when the Council’s own figures show the shortfall is minor. It does not appear to be justified.

- Unfortunately, there are real-world and irreversible outcomes if the plan is implemented as proposed. The outcome for “character” inner city areas could be significant. In the 2019 WCC Planning for Growth Survey “Appropriate management of character protection was the most discussed issue. Adamant opposition to character loss was expressed in around 200 comments, with the main sentiment being that the that the essence of what makes Wellington a great city would be lost if character was not protected”. This is a quote from the Council’s own report.

**Table 1 Housing Sufficiency table** (summarising how the Demand/Capacity numbers are derived)

<b>Wellington City - Housing Sufficiency (shortfall/surplus) TOTAL 2017 - 2047 (30 Years)</b>			
	Incr/Decr	Medium Forecast ID	High Growth Stats NZ
<b>4) Population Growth - Projections</b> (Low Growth circa 20,000)		46,766	74,484
<b>3) Housing Demand (New Build Demand)</b>			
- Required Dwellings		21,339	32,337
- Adj. Required Dwellings ( +20% Short-term & 15% Long-term)	3,590	24,929	32,337
<b>2) Housing Development Capacity (Existing Capacity for New Build)</b>			
- Plan Enabled Capacity		106,411	106,411
- Adj. Economically Feasible to Develop (26%)	-78,457	27,954	27,954
- Adj. Realisation Capacity	- 7,660	20,294	20,294
<b>1) Shortfall (Demand less Capacity) - Over 30 Years</b>		4,635	12,043
<b>1a) Shortfall (Demand less Capacity) - Average Each Year</b>		155	401
			260%

**NOTE: All Figures from : Housing and Business Development Capacity Assessment Wellington City Council Report 8 Nov'19**

The underlying assumptions about growth are driving a process leading toward reduction in protection for inner city character areas in order to provide intensified development.

Key points to note:

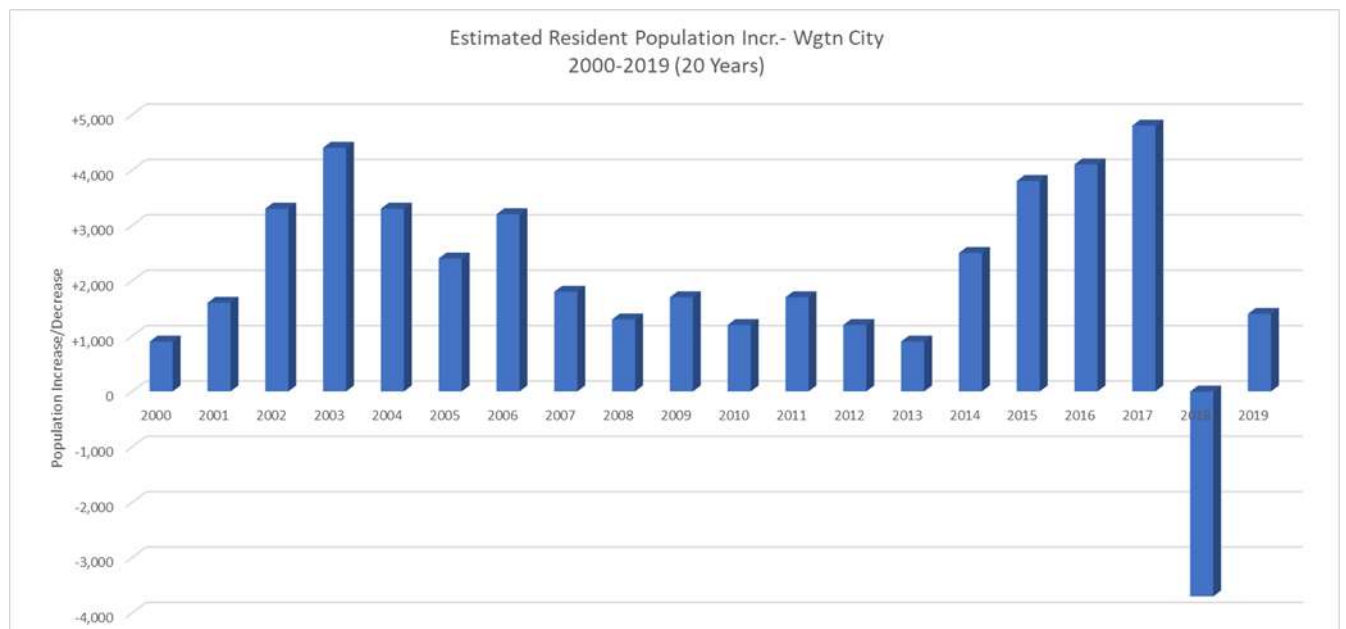
- **The Required Dwellings** - are increased by 3,590 to factor in a “suitable buffer of over-supply” to 24,929 Dwellings.
- **The Housing Development Capacity** - starts at 106,411 & finishes at 20,294.

An economically feasible overlay is applied (at the point in time of the analysis) massively dropping the number to 27,954 dwellings. Then the realisable capacity is applied (recognising that only some will build within the 30-year duration) reducing the capacity by a further 7,660 to 20,294 dwellings.

**Table 2 Growth Rates**

Estimated Resident Population (ERP)			
Wellington City			
Year (ending June 30)	Number	Change in number	Change in percent
2000	169,500	+900	+0.5
2001	171,100	+1,600	+0.9
2002	174,400	+3,300	+1.9
2003	178,800	+4,400	+2.5
2004	182,100	+3,300	+1.8
2005	184,500	+2,400	+1.3
2006	187,700	+3,200	+1.7
2007	189,500	+1,800	+0.9
2008	190,800	+1,300	+0.7
2009	192,500	+1,700	+0.9
2010	193,700	+1,200	+0.6
2011	195,400	+1,700	+0.9
2012	196,600	+1,200	+0.6
2013	197,500	+900	+0.5
2014	200,000	+2,500	+1.3
2015	203,800	+3,800	+1.9
2016	207,900	+4,100	+2.0
2017	212,700	+4,800	+2.3
2018	209,000	-3,700	-1.8
2019	210,400	+1,400	+0.7

High  
Immigration



Source: Statistics New Zealand, Subnational Population Estimates - information releases for 30 June 2013  
 Compiled and presented in profile.id by .id, the population experts. <https://home.id.com.au>

**Table 3 Breakdown of medium population growth statistics**

The official population of the Wellington City as of the 30th June 2019, is 210,400							
The Wellington City population forecast for 2020 is 214,537, and is forecast to grow to 248,953 by 2043							
<b>Wellington City</b>							
	<b>Component</b>	<b>Total 2019-2043</b>	<b>2019 to 2023</b>	<b>2024 to 2028</b>	<b>2029 to 2033</b>	<b>2034 to 2038</b>	<b>2039 to 2043</b>
Births			12,191	12,475	12,620	12,842	13,290
Change in persons in non-private dwellings			371	305	245	282	105
Deaths			5,247	5,877	6,578	7,321	7,997
<b>Natural increase/decrease</b>		<b>30,396</b>	<b>6,943</b>	<b>6,597</b>	<b>6,042</b>	<b>5,521</b>	<b>5,292</b>
<b>Net migration (external &amp; internal)</b>		<b>6,107</b>	<b>2,964</b>	<b>980</b>	<b>-1,305</b>	<b>827</b>	<b>2,640</b>
<b>Total population change</b>			<b>10,279</b>	<b>7,883</b>	<b>4,982</b>	<b>6,630</b>	<b>8,038</b>
			10279	7883	4982	6630	8038
<i>Population and household forecasts, 2013 to 2043, prepared by Forecast .id , the population experts, November 2019.</i>							



**Petition calling on Wellington City Councillors & Mayor  
to reject the Spatial Plan proposal  
and retain the pre-1930s demolition rule for all of Mount Victoria**

This petition was conducted largely face-to-face, but with some signatures also collected at The Mt Vic Hub and one local business. There was no online version. This method was chosen so that we could engage directly with residents, inform them about the Draft Spatial Plan and so they were clear about what they were signing. As much of Mt Victoria as possible was covered within the limited timeframe.

The action petitioned for was: We, the undersigned Mt Victoria residents, call on WCC Councilors and Mayor to reject the Spatial Plan proposal and retain the pre-1930s demolition rule for all of Mt Victoria.

This statement

Owing to the size of the petition, it is not possible to attach it as an electronic appendix.

It can be accessed at:

<https://www.dropbox.com/sh/srlgmoq7ng04o5f/AADg4ttNJxUyqjIINi1kbshGa?dl=0>

Summary details are:

<b>MVHS PETITION - WCC Draft Spatial Plan</b>		
Population Mt Vic - 2018 Census	4527	
Total Signatures	752	
Non Mt Vic Residents	<u>67</u>	
<b>Mt Vic Residents</b>	<b>685</b>	<b>15%</b>