



21 July 2020

Mayor Andy Foster  
Wellington City Council  
WELLINGTON

Dear Mayor Foster

This letter draws your attention to a serious concern by Historic Places Wellington, the Thorndon Society and the Mt Victoria Historical Society.

WCC proposes to release shortly its draft spatial plan material for consultation, within its "Planning For Growth" agenda. We believe it should be significantly postponed for the following reasons:

1. The growth rationale of the Planning For Growth agenda is highly questionable post-COVID. The agenda is predicated on the need to provide city residences for an additional 50-80,000 Wellingtonians by 2047. Those numbers reflected the "medium" to "high" projections of population growth from Statistics NZ. Even pre-COVID, those statistics are highly debatable. Post -COVID there is considerable uncertainty around living, working, visiting and migration patterns for Wellington. Additional evidential material about the projections is required and a period of stability in which to identify whether a "bounce-back" to pre-COVID is fully reflected in residential demands. Accordingly, we believe the "low" projection from the same stats, only an additional 18,000 residents, should be included in WCC's rationale.
2. The central government policy, and the framework for the Planning for Growth agenda remains unclear. WCC's project is guided by the existing RMA National Policy Statement on Urban Development adopted by the previous National Government. Last year the current government consulted on a new Draft National Policy Statement - Urban Development under its "Planning Successful Cities" project. Along with many other organisations, ours made submissions on that document reflecting our interest in ensuring due consideration be given to heritage protection as a matter of "national significance" under s.6 of the RMA. The new National Policy Statement is not yet released, therefore it is not appropriate to consider this as guidance for Wellington's urban development.
3. The timing of spatial plan consultation is inappropriate. A proposed six week period for WCC consultation which exactly overlaps with the period for the central government election

causes difficulty. It means public engagement is difficult when media focus is on the election campaign. The upcoming consultation on the very important matter of the strengthening of the central library heritage building is also important and risks overshadowing debate on the Spatial Plan ideas.

For those reasons, we believe it is not the right time to press on with plans designed to lead to intensification of the inner residential (character) areas by permitting demolition (without consent) of pre-1930 structures. Those structures reflect the character and identity of Wellington and the protections in the current plan have been very effective in protecting that heritage.

We believe it is important to take the time to reassess and re-imagine our city in light of the changes caused by COVID, which are yet to become clear. For example, there could well be additional central city commercial space appropriate for residential re-purposing.

These matters are of very great concern to our groups. We want to build back better, and not allow uncontrolled and unnecessary demolition in our existing heritage neighbourhoods.

Yours sincerely

Felicity Wong

Chair, Historic Places Wellington, and on behalf of the Mt Victoria Historical Society, and the Thorndon Society

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