



5 August 2020

Mayor Andy Foster
Wellington City Council
PO Box 2199
Wellington 6140

Dear Andy

Wellington City Spatial Plan

This letter is on behalf of community-based NGOs: The Thorndon Society; Mt Victoria Historical Society and Historic Places Wellington Incorporated and expresses the collective concerns of our members.

We are writing to you as a matter of urgency before your Council votes on a proposed Spatial Plan process.

We were invited to submit on the National Policy Statement – Urban Development 2020 (the NPS-UD 2020) and our organisations did so. Whilst we are not opposed to urban intensification per se, we are concerned about it occurring at the expense of heritage. To that end we successfully submitted for heritage and character to potentially be Qualifying Matters under Subpart 6. However, we are deeply concerned about the proposed Spatial Plan process which appears now to be premature and out of sync with the NPS-UD 2020.

In our respectful opinion, the proposed Spatial Plan process will be effectively redundant come 20 August 2020 when the NPS-UD 2020 becomes operative. As you will be aware, the NPS-UD 2020 introduces new obligations for all Tier 1 local authorities including Greater Wellington Regional Council and Wellington City Council. The expert advice we have obtained goes to the required methodology of a Future Development Strategy (FDS) and the information requirements for formulation of that critical document. The first of those requirements is the completion of a Housing and Business Capacity Assessment (HBA) in accordance with the NPS-UD 2020. The purpose of an HBA is set out at 3.20 of the NPS-UD 2020:

3.20 Purpose of HBA

(1) The purpose of an HBA is to:

(a) provide information on the demand and supply of housing and of business land in the relevant tier 1 or tier 2 urban environment, and the impact of planning and infrastructure decisions of the relevant local authorities on that demand and supply; and

(b) inform RMA planning documents, FDSs, and long-term plans; and

(c) quantify the development capacity that is sufficient to meet expected demand for housing and for business land in the short term, medium term, and long term.

Vitality, the HBA is to inform FDSs, Local Government Act 2002 LTPs and planning instruments pursuant to the Resource Management Act 1991. Further, the new contents of an HBA are set out in significant detail at sub-part 5 of the NPS-UD 2020 and include a quantification of demand and capacity within the Wellington district. In order for that process to have any integrity at all, the Council will need to undertake fresh research. This is particularly so in the Covid-19 environment with its decentralised effects which seem likely to be enduring. The HBA of November 2019, does not comply with the requirements of the NPS-UD 2020 in material ways.

Other concerns include the relevance of VUW and Massey Universities' international student populations in Covid and post-Covid environments; the enforced pause to WIAL's runway extension project and emerging concerns as to the reliability of the 2016 Census. Also, Wellington's present economic environment may well be skewed by the Covid wage subsidy through to the end of September 2020.

Worthwhile data as to housing and business demands, and capacity, does not yet exist and it would be foolhardy to fall back on pre-Covid assessments to inform the Council's obligations pursuant to the NPS-UD 2020. Spatial planning of our urban environments that is not properly grounded in the new NPS-UD 2020 principles and based on current (relevant) data will have little or no value for worthwhile long-term planning of the city's urban environments and its special heritage character areas in which we are most interested.

For all of these reasons, a spatial planning exercise ahead of the new NPS-UD 2020 processes will be a poor use of resources and an unhelpful distraction, especially in the lead up to a general election. In our opinion, the spatial planning process should be reconsidered or at least delayed until better quality information is available to formulate a reliable FDS as predicated by the Government's forward thinking new NPS-UD 2020. Within the next 12 months, the city may be able to extract the crucial data necessary on which to model a meaningful HBA so that the spatial components of the FDS can be identified and introduced to the District and Regional Plans, and the Council's LTP with a degree of confidence.

Whilst the Spatial Plan purports to be on the basis of updated economic evidence, that cannot reasonably be the case because the real effects of Covid-19 are yet to be experienced, primarily because the Government has moved to temporarily cushion the

impacts and soften the landing. Meaningful data, when it emerges, will not credibly be able to inform a FDS spatial plan process if that process is already well underway. The first step in implementation of the NPS-UD 2020 is a real-time assessment of supply and demand for housing and business, not consultation on a spatial plan derived from pre-covid-19 data.

We ask that you and your councillors give serious consideration to replacing the present spatial plan process with the steps clearly outlined by the Government in the new NPS-UD 2020.

I look forward to hearing from you.

Yours sincerely

Felicity Wong
Historic Places Wellington Inc.

ccAll Wellington City Councillors

SEP