

## SUBMISSION ON THE WELLINGTON CITY COUNCIL DRAFT SPATIAL PLAN

Mail to: Wellington City Council

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Draft Spatial Plan Submission

(or print and post to Planning for Growth, Wellington City Council, PO Box 2199, Wellington)

1. I question the basic assumption of having to accommodate 80,000 more people in the next 30 years. The amount of housing required is 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.

2. I am 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.

3. I support the character suburbs (Thorndon, Mt Victoria, Aro Valley, Mt Cook, Newtown and Berhampore) being recognised as collections of buildings which represent historic heritage, but which individually may not warrant scheduling as significant historic heritage places or areas.

4. I regard the character suburbs as heritage suburbs with significant heritage value which merits recognition as a “qualifying matter” under Policy 3.32(1)(a) of the National Policy Statement on Urban Development (NPS-UD 2020).

5. I support the recognition that historic heritage and residential character is entwined in those suburbs and cannot be artificially separated, except in a collaborative process involving their residents.

6. I oppose the provisions of the Draft Spatial Plan as they apply to those suburbs because the focus has been limited to matters related to residential character and amenity value and to a few sites and discreet streets being exempted under NPS-UD Policy 3.32(1)(h). That negates arguments supporting the protection of heritage and favours the development of more intensive forms of housing.

7. I oppose the Council's intention to remove from large areas of these suburbs the protection provided by the rule requiring a resource consent prior to demolition of pre-1930 buildings. That rule has worked well to preserve the heritage and residential character of these suburbs.

8. I draw attention to the Boffa Miskell report of February 2019 which found that 70-80% of the buildings in these suburbs are either “positive” or “contributing” to the suburb's intact character. It is therefore inappropriate to reduce the coverage of protection to only 20-30% of the suburbs.

9. I oppose the range of measures promoting new housing development in these suburbs until the detailed District Plan draft rules are available. It is not possible to evaluate the full impact of the DSP until those rules are known. Encouraging denser housing forms will result in the ongoing loss of valuable heritage housing stock and the erasure of the character of Aotearoa's oldest suburbs.

8. The protection of historic heritage is a matter of national importance and in this regard the Council should approach the future planning of the suburbs from the perspective of protecting, enhancing and promoting them as valuable heritage assets. This policy approach should not be abandoned in favour of the radical erasure of Wellington's identity.

Name: .....

Address: .....

Date: .....

Phone: .....

Email: .....

I am making this submission as an individual. I do not wish to speak to my submission.

NOTE: SUBMISSIONS CLOSE ON MONDAY 5 OCTOBER 2020