The Mount Victoria Residents’ Association Inc (MVRA) appreciates the opportunity to comment on the National Policy Statement on Urban Development. We agree that creating more liveable cities is important for a more sustainable, productive and inclusive society. We support a NPS-UD that will ensure we develop well-functioning, inclusive and better connected cities that reflect the diversity of their current and future communities. We agree that our cities need to offer affordability, access and quality, while functioning within environmental limits.

However, we question the approach taken to get there.

MVRA is an active advocate on behalf of our community, promoting the needs of our community and supporting appropriate development in our neighbourhood. This submission will address issues which can be considered the direct mandate of our organisation.

Currently, the issues we see in Mt Victoria are poor quality housing developments that do not provide a good quality of life, a loss of the heritage and character that make our community unique, and ongoing difficulties and tensions that arise directly as a result of current planning processes in use by our local authority.

Future Development Strategies (FDS)

MVRA fully supports the submission made separately by Mt Victoria Historical Society, as regards recognition and preservation of Mt Victoria’s heritage and character areas.

MVRA opposes the removal of pre-1930s protections in the District Plan and would prefer these to be strengthened to prevent loss of heritage /character areas. Heritage and character areas can be, and are densely populated but also add much to the character of our city as a whole. These areas are not only well-loved by locals, but images of these areas are consistently utilised by local government, tourist agencies and businesses to promote Wellington, and to bring revenue to the wider city – “an important visual backdrop to the city” (from the Residential Design Guide).

We are greatly heartened by the statement “The aim is to reduce car dependency, fix our broken system for funding and financing infrastructure, … “
With this in mind, we look forward to seeing emphasis on strong infrastructure being planned for, and being in place before developments are consented. What we see now is that there are many developments throughout the city, where people have nowhere to keep their rubbish, for instance, or their access to public transport has been removed.

We expect that the implementation of the ‘quick win’, lower-budget items from Let’s Get Wellington Moving will remove and/or decrease the need for people to be dependent on cars, so we look forward to the removal of carparks, to make way for more structured pedestrian and cycle space.

We wonder at the lack of detail around Climate Change in this proposal. Here in Mt Victoria, we know our water infrastructure is largely unknown to anyone currently alive, and we are concerned at the prospect of development placing further strain on its creaky resources, to say nothing of issues arising from changes in our climate – the increasing number of storms has placed significant pressure on the existing framework over the last few years.

**Making Room for Growth**

MVRA mostly supports the definition of “quality urban development”, as it appears in Objective 2, but is concerned at the absence of any reference to amenity values. Sunlight, clean air, space to move and a reasonable level of quiet should be available to all. This is not an exhaustive list of amenity values, of course, but is a good place to start.

When we mention poor quality developments above, they are characterised by inattention to each of these values – and often more.

It is vital that the physical environment not only provides a decent living space, but also supports the mental, spiritual and emotional wellbeing of all people within our community. Any development that allows disconnectedness or inaccessibility issues cannot be accepted.

The idea that central government will assume powers to “direct local authorities to enable higher-density residential development in specified areas …” is concerning to us. The rationale provided – that providing housing in proximity to jobs and transport options – simply makes little sense. If the proposal’s other objectives around provision of infrastructure are achieved, there should be no reason to ‘hub’ residential developments in this way.

Additionally, the function of local authorities is to understand closely the nature and the drivers of the areas they serve. To have central government in a position to potentially wield a blunt instrument-type residential development policy would be needlessly autocratic, and removes the community even further from decisions that are made for it.

In general, MVRA opposes greenfields developments and supports development in existing areas in the inner city and suburbs - particularly increasing density in less dense areas where there are good public transport connections already, eg. Johnsonville, parts of Kilbirnie, Brooklyn, Tawa etc.
Engagement on Urban Planning

The current planning process is woeful, as regards community engagement, and leaves us sceptical about any objectives around engagement in this proposal. Our members find it impossible to accept that we, as members of the community, should put aside our concerns around losing current amenity values, in the hopes that a proposed development will deliver us something better.

1. We say this because the current planning process has no requirement to engage, or even inform, the community of upcoming developments. Neighbours to developments cannot expect to even be informed of the working hours or timeframes for development sites, or in some cases, that work is to start at all – let alone have a say.

2. We currently see that discretion is used liberally in the planning process within our local authority. Height and coverage limits are consistently breached, and as above, no notice to neighbours and/or the community is provided unless specifically sought. Of course, this information is usually unavailable until after the consent is granted. There is no engagement or advice to the community around how effects on neighbouring properties are appraised.

These aspects of the planning process must improve if remarks like those quoted from Beca are to land with anything other than offence. It’s of note that a private sector developer is quoted in your proposal at all.

Our interactions with local authority planning officers show them to be diligent and capable of understanding rules around planning, but very hazy on what community drivers are out there.

If there is a lack of communication to this extent, how can you expect to demonstrate enhanced amenity at a community level?

3. Currently, members of the public who have concerns find that they have no say in the process. Additionally, we disagree with the implication that only lower socio-economic groups are under-represented or absent in the planning process. If there is concern at a proposed development, the only way for a person to have those concerns heard, is to engage in High Court action. This is obviously beyond most people – not just those in lower socio-economic groups.

How can we call this arrangement anything other than non-inclusive, undemocratic and discriminatory?

These three areas of concern are reported to us again and again, and we suggest that they are reviewed and improved with some urgency, so that planning departments at local authorities can start to win back the community’s trust. We look forward to seeing effective communication and engagement between local authorities and all communities, including iwi and hapu.

Conclusion

MVRA supports urban growth absolutely, and looks forward to being part of that. To support that growth requires strong infrastructure for residences and public transport, as well as good-quality developments that support social wellbeing, as well as providing physical comfort and respecting existing amenity and heritage. We know that this is possible – we see examples of it done well throughout the world – so we’re hopeful that it will be done well here.

However, current processes and attitudes will not get it done well, and we remain unconvinced that a heavy-handed approach from central government will improve that. What needs to happen is to effect a cultural change at local authority level - to really put people at the centre of every decision.