July 2021

Submission to Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD) on the development of the Government Policy Statement on Housing and Urban Development (GPS-HUD).

Introduction

The Newtown Residents' Association is the Incorporated Society representing Newtown and the surrounding suburbs. We are an active local group of residents and businesspeople, concerned with maintaining and improving our area’s liveability, connectedness and sustainability and working to make our community a thriving, diverse, great place to live.

The Association has a history of positive urban design action and active placemaking. Association members have been very engaged and involved with successive iterations of the Wellington City Council District Plan, and helped to create an urban design guide for the area. The designers who led a community based urban design project in the 90’s, which has created the very liveable and walkable Riddiford St design, were Association members. We have a party every year to celebrate this community engagement, the Newtown Festival, still going strong 25 years later. The first street festival happened as a celebration of that project’s completion.

Our Built Environment

Newtown is a suburb of Wellington where the narrow residential streets are packed with primarily one or two storey timber homes on small sections. Because of the proximity to Wellington City and to a public transport corridor the majority of this area is now regarded by Wellington City Council as being subject to the NPS-UD requirement for enabling 6 storey buildings. There will be many communities throughout the country in a similar situation.

Submission

We have chosen to make the Association’s submission in this written form as the points we want to make don’t fit neatly into the format of the survey.

The GPS-HUD Vision:

“Our vision is that everyone in Aotearoa New Zealand lives in a healthy, safe, secure, and affordable home that meets their needs, within a thriving, inclusive and sustainable community.”

We thoroughly agree with this vision. Indeed we agree with almost all the Aspirational Outcomes, the Focus Areas and the Ways of Working.

We particularly resonate with the Aspirational Outcome #1 for Thriving communities:

“Everyone is living in homes and communities that meet their employment, education, social and cultural wellbeing needs and aspirations — places that are affordable, connected, environmentally sustainable, safe, and inclusive.”

However we are concerned that the detail of the document does not demonstrate how to ensure these outcomes. The GPS-HUD, the NPS-UD and the coming Natural and Built Environment Act should all be aligned, but there are aspects of the NPS-UD which are incompatible with the GPS-HUD aspirations, as described below under ‘Placemaking’. As the Natural and Built Environment Act is still being developed there is an opportunity to make sure that the Act and the GPS-HUD are in agreement, but there are aspects of the current NBEA exposure draft which call this into question.
Themes in the GPS-HUD

There are themes threaded through the different sections of the consultation document. In particular there are many references to partnership and community based placemaking, and also to sustainability. This submission explores the practical implications of these themes.

Placemaking

On page 65 of the GPS-HUD consultation document we read:

“Ngā whakahoahoa ā-wāhi

Place-based approaches “

“A one-size-fits-all solution for housing and urban development will not deliver the thriving communities we want.” This follows on to “...we will be taking a place-based approach to policy and interventions that recognises that local conditions, partnerships, and solutions are integral to designing interventions that work.”

We strongly agree with these statements, but our experience is that the NPS-UD can indeed be used as a “one size fits all solution” to increasing urban density.

On page 32 the consultation document says

“Our vision is about more than building houses. We want the people of Aotearoa New Zealand to live in homes in communities that support wellbeing, and that requires us to maintain a focus on place making.” And on page 48 –

“Towns and cities will only grow well when people, communities and institutions are connecting and collaborating early, learning from the past and from each other, and sharing knowledge to plan for growth and change (for example, natural resources are respected and cared for as living tupuna in te ao Māori).”

Our Residents’ Association has focussed on placemaking over many years. We strongly support increased urban density, and are advocates for the concepts of ‘density done well’. In our local community we have spent a great deal of time identifying good locations for 6 storey developments. These developments would be focussed on under-utilised commercial and industrial ‘brownfield’ sites, mostly in the Newtown Suburban Centre, and have the potential to provide over 2000 new homes. We recommended to Wellington City Council that these developments should be supported, and that developments in the residential streets should respect the human scale of the neighbourhood and should mostly be restricted to 3 storeys; there will be more about the reasons for this under ‘sustainability’. Our attempts to engage with the Council in collaborative planning about this have been unsuccessful. The majority of our residential area is regarded by Wellington City Council as being subject to the NPS-UD requirement for enabling 6 storey buildings and this is reflected in their decisions about the Spatial Plan. The Spatial Plan has yet to be translated into a new District Plan.

We would like the Government to find a solution for the dilemma of increasing urban density, in the spirit of the NPS-UD, without allowing the NPS-UD requirements to obliterate the potential for local placemaking.

Partnership

Also on page 65 of the consultation document we read:

“Ngā hononga pono, hononga mauroa

Genuine and enduring partnership

Maximising the benefits of housing and urban development requires proactive and genuine collaboration between numerous organisations.

Government is committed to expanding our capacity to nurture our relationship with iwi and Māori as our Te Tiriti o Waitangi partner and are essential to generating the right housing and urban outcomes moving forwards.
Government also needs to pursue meaningful and real relationships with local government, industry, non-government organisations, local voices, and voices of lived experience. [our italics].

It is particularly important that Kāinga Ora develops genuine and enduring partnerships to deliver the best outcomes for communities.

Across our work we will pursue partnerships and relationships for people and places, leveraging the knowledge and connections that come with being a part of the Crown.

Government agencies will work more closely with each other to align investment and outcomes thereby maximising the impact that government intervention can make in places and for people."

This submission strongly supports the goal of including iwi and Māori in planning, and nothing we say is intended to cut across or diminish the importance of the Treaty partners.

However we observe that this section is about Government agencies having control of the process, and the focus is primarily on partnerships between Government Departments, Local Government, developers, community housing providers and similar organisations.

We ask that the ‘ways of working’ around partnerships include much greater recognition of the “local voices, and voices of lived experience”. These are acknowledged in the policy but there is very little said about how to utilise the expertise and experience of existing communities. Unless this is put into practice the goals on local placemaking cannot be achieved.

Sustainability
The importance of sunshine

Assurances about sustainability are threaded through the consultation document. However the GPS-HUD, the NPS-UD and the coming Natural and Built Environmental Act may not be aligned in ways that achieve these goals. A particular concern is that concepts such as ‘amenity values’ tend to be regarded as barriers to urban intensification. They are likely to be dropped from the NBEA and disregarded in planning rules.

One of the key ‘amenity values’ has traditionally been the protection of access to sunlight. We strongly advocate for sunlight being an extremely important aspect of well-being, and a compelling reason for District Plans allowing resource consents to limit the height of new buildings and to have other provisions to prevent excessive and damaging shading on existing homes. Sunlight isn’t just a ‘nice to have’, particularly when the existing housing stock is homes built of native timbers. The majority of these homes in our area are warm and dry when they are well maintained, but they need sunlight to keep them that way. A more detailed analysis of this can be found as an appendix at the end of this submission

There is no overall benefit to the provision of sustainable housing if new developments of warm, dry apartments lead to widespread deterioration of the existing homes. This outcome is not mere speculation, this has already happened when high rise developments were allowed in the Wellington suburb of Te Aro in the 1970s. This was one of the factors that led to our current planning rules. No one expects new developments to take over the whole area in inner city suburbs, in fact uptake figures as low as 14% of available sites have been mentioned, but if the new developments are out of scale with the surrounding housing the effects of shade will mean that homes that are warm and dry now risk becoming cold and damp, reducing the quality of life and affecting the health of occupants of all ages in these neighbouring flats and homes. We also note that if existing homes are allowed to become shaded then more energy will be needed to keep them warm and dry, and solar panels on these homes will not be able to operate as intended, all diminishing environmental sustainability.

The environmental effects of demolition and rebuilding

On page 68, under ‘action’ the consultation document recommends
“Agencies working together to develop and implement data, evidence and tools to understand climate impacts of housing and urban development, and operational and embodied emissions resulting from policy, investment and planning decisions.”

We agree that this is crucially important, but again other aspects of housing policy have gone ahead of this understanding. NPS-UD expects to reduce emissions from transport by enabling urban densification within walking distance of public transport routes and commercial centres. However there is a lot of demolition and new building required in these plans and new building, particularly high rise, is very carbon intensive.

On the other hand the existing old houses built of native timbers represent a great deal of embodied energy and sequestered carbon. Many have been adapted and upgraded over time, which is more environmentally sustainable than replacing them. Also these buildings are resilient and have survived 100+ years of earthquakes in Wellington, while the damage from recent earthquakes has led to several comparatively new buildings being demolished.

We would like to see much more emphasis on understanding the complexities of the climate impact of housing and urban development, as above. We understand that both nationally and internationally there is increasing interest in the adaptive reuse of existing buildings, and we would like to see this explored further.

In conclusion

Thank you for the opportunity to make this submission. The overall vision and goals of this proposed Government Policy Statement align with values that we strongly agree with, but we ask that the Government makes sure that all the policies that guide housing and urban development support actions that make it possible to realise these goals.

Rhona Carson
President
Newtown Residents’ Association

Appendix – the importance of sunshine.

The NPS-UD allows local authorities to take into account Social, Economic, Environmental and Cultural qualifying factors when deciding the land to be zoned for intensification.

SUNSHINE

Sunlight is important for warmth and wellbeing. That it won’t matter if tall apartment buildings cast shade across lots of low rise homes is an idea from a continental climate. In the likes of continental New York, Paris, Milan, or Melbourne the climate can be so hot in summer that you want to escape the sun and be in the shade, and in wintertime it is so cold the sun won’t warm you up anyway. In Wellington’s temperate coastal climate with its high humidity, direct sunshine is important summer and winter, it’s the natural carbon zero engine that powers the survival and wellbeing of our existing timber structures, living plants and our people [ tenants and owners equally ]. In Wellington people seldom gather in the shade when in the sun is an option. Because we are a cooler climate many people aren’t aware of how high our humidity is.*

The very closely packed wooden houses on small sections of the character inner suburbs with their small gardens and trees, form such a tight dense configuration the effective ground plane is often 1 - 2 storeys above actual ground level. Much of the housing stock were built so close together they only receive sunshine on two sides and on their roof during the course of a day. Many of the existing dwellings in Newtown are accessible, have proven resilient to earthquakes and storms. They’re adaptable housing stock supporting multi generational families from diverse
cultural backgrounds. The existing neighbourhoods and their greenery are an ecosystem like a living breathing organism, part of the lungs of the city.

The mass of established buildings and their garden vegetation depend on sunshine for survival. 90 to 150 year old wooden houses are all built out of untreated heart native timbers that rely on being warm and dry to not grow mould and rot. Sunshine is essential to their survival. Proven over a century the community of homes is a fit with its solar input. Although some that are too damp remain and need to be fixed up or replaced, most structures where the conditions were too damp have already rotted out and been replaced. Over the decades, the importance of sunlight for the occupants and the structures has been understood, acknowledged and supported by the daylight envelope rules and height limits in the District Plan.

Add in six storey tall apartment buildings blocking the sunshine across an existing inner city neighbourhood then that neighbourhood will become colder and, because of our high humidity, damper, shaded trees and gardens will cease to thrive, the existing accessible, adaptable, resilient housing stock will begin to rot and decay. Spatial planning for these existing functioning communities of tenants and owners needs to consider as qualifying factors their natural renewable energy needs, their current functionality, their embodied energy and their sequestered carbon.

- **82% humidity** at 3pm Wed 9th June, a bright sunny autumn-like day
- **87% humidity** at 6pm Tues 8th June, a cloudy day.
- **100% humidity** for most of Mon 7th June *(but no rain!)*, low cloud most of the day