

30 August 2012

**Re: Walter Mildenhall Park, Naenae**

Bruce Hodgins  
Divisional Manager, Park and Gardens Division  
Hutt City Council  
Private Bag 31 912  
Lower Hutt 5040  
New Zealand

Dear Bruce

This submission is from the Architectural Centre, an incorporated society dating from 1946 which represents both professional and non-professionals interested in the promotion of good design, and in the promotion of good design in Wellington.

The Architectural Centre opposes the proposal to reclasssify part of Pt Lot 1 DP 17448 (part of Walter Mildenhall Park, Naenae) as a Local Purpose Reserve with a new sub-classification of Social Housing reserve status in order to lease the land to UrbanPlus Limited for the provision of housing for the elderly. We note the following:

- (1) While recognising the importance of the provision of social housing in a community, this proposal does not appropriately address the competing social needs of accessible unstructured recreational space and the provision of social housing.
- (2) Advice to the Council's Policy Meeting observed that "it makes sense to not provide UrbanPlus' social housing in areas where there is a large proportion of HNZ homes," and that the area which Walter Mildenhall Park is located has good provision of Housing NZ Corporation Housing (Policy Meeting (29 November 2011) Appendix 1, pp. 234, 235).
- (3) Currently "there are no examples of reclassification of a reserve to enable a community housing development" and we are concerned regarding the precedent which would be set in classifying part of Walter Mildenhall Park as such (DLA Phillips Fox, letter to Joycelyn Foo, 17 October 2011, pp. 4-5).
- (4) The existing Higher Density Housing zone around the park will be extended under District Plan Change 12. (PAOS Ltd "Walter Mildenhall Park: Proposed Social Housing: Assessment of Effects (June 2011) p. 67). This will increase the potential for increasing housing needs. It will also mean that accessible unstructured recreational space will become increasingly important to meet the needs of a higher density residential area, and more, rather than less, open recreational space will be needed.
- (5) Walter Mildenhall Park has been identified as having high heritage value by the New Zealand Historic Places Trust/Pouhere Taonga because of Naenae's national significance as an example of Ernst Plischke's Modernist town planning (New Zealand Historic Places Trust "Research Report on Heritage Features: Naenae, Lower Hutt" (13 August 2012). The proposal to reclassify part of Walter Mildenhall Park as "Social Housing" will compromise the heritage status of the existing park.

Consequently, the Architectural Centre strongly recommends that the Hutt City Council oppose the proposal and instead put forward a plan to:



the architectural centre inc.  
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(i) develop the unstructured recreational areas of Walter Mildenhall Park to better support its use by local residents into the future. We note that this open space is of a very different nature to other indoor and structured recreational space provided on the site.

(ii) explore alternative ways, such as sensitive infill intensification of existing low density housing areas, in order to increase social housing where there is demonstrated need in the Hutt. Best practice medium density infill projects could both increase social housing provision and provide exemplary projects demonstrating how other parts in the "Higher Density Housing Zones" are to be developed by the private sector.

Thank you for this opportunity to make a submission on the proposal for social housing on Walter Mildenhall Park.

Yours faithfully

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