

3 September 2018

Attn. David Mitchell  
Senior Spatial Planning Advisor  
Wellington City Council  
P.O. Box 2199  
Wellington 6140  
upperstebbingvalley@wcc.govt.nz

**Re: Proposed Upper Stebbings Valley community**

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

The Architectural Centre strongly opposes the proposal to "create a new community in Upper Stebbings Valley and Glenside West." It appears to us that proposing this is the reverse of good city planning and city council and regional council policy direction to increase residential density, encourage residential growth along existing transport corridors especially rail and bus routes, and to protect urban margins for horticultural production and for forestry to provide carbon sinks.

We also note that while the development is on a transport corridor, the traffic assessment concludes that: "even the lowest level of development within the Upper Stebbings Growth Area, is anticipated to result in significant capacity and intersection performance issues on the existing road network in the Churton Park and Tawa areas" (p. 32). These anticipated capacity problems are in addition to the needs to accommodate safe and effective pedestrian and cycling facilities, and projected increases in public transport use and indicates that a case for this development in Upper Steebings Valley is difficult to make.

We note that Wellington does not have a high density when compared to major cities internationally. Wellington's density (using 2013 Census figures) is 6.58 people/hectare.<sup>1</sup> In contrast London and Paris are 60.9 and 38.59 people/hectare respectively.<sup>2</sup> In this respect we note the capacity for Wellington to absorb additional population growth within existing urban areas.

In 2013 Te Aro had the highest population density in Wellington city of 81.56 people/hectare.<sup>3</sup> If Wellington had this density across the city we could house 2,349,405 people. Given issues of topography and a desire for open spaces within the city this is unlikely to be desirable, but if we increased Newtown (33.16 people/hectare), Kilbirnie (33.93 people/hectare), Rongotai-Moa Point (5.55 people/hectare), Wadestown (25.26 people/hectare) and Thorndon-Pipitea (15.40 people/hectare) to the same density as Te Aro we would accommodate 58,477 more people.

Consequently we strongly encourage the WCC to consider what planning provisions would encourage higher use of our inner city land and discourage developments such as you are proposing at Upper Stebbings Valley. In saying this we are not proposing that all of Wellington's suburbs reach the density of Te Aro

<sup>1</sup> .idcommunity demographic resources (source NZ Census) <https://atlas.idnz.co.nz/wellington/maps>. 2013 figures are used as 2018 figures are not available.

<sup>2</sup> Demographia World Urban Areas (2018) <http://www.demographia.com/db-worldua.pdf>

<sup>3</sup> .idcommunity demographic resources (source NZ Census) <https://atlas.idnz.co.nz/wellington/maps>



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immediately, but that we consider that planned and gradual increase will absorb significant amounts of population growth.

Thank you for this opportunity to comment on Proposed Upper Stebbings Valley Community. If you have any questions please do not hesitate to contact us.

Yours faithfully



Christine McCarthy  
President, Architectural Centre