

Our City Tomorrow: A Draft Spatial Plan for Wellington City

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Online submission form ID 15185

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Organisation Name: Heritage New Zealand Pouhere Taonga

Compulsory Questions

1. To what extent do you agree or disagree with what is proposed with intensification in the Central City?

Agree

2. To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs?

Strongly Disagree

3. To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs?

Neutral

4. We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall, to what extent do you agree or disagree with our approach to this distribution?

Disagree

4a. If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

Please refer to attached submission document

5. To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs?

Strongly Disagree

6. We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

Please refer to detailed submission attached

7. What amenities would you want to help create a vibrant suburban centre? (select 5 options)

Proximity to parks and open space, Access to public transport, Commercial activity (retail, cafes, local businesses)

Other: Retention of character and heritage

8. What amenities would you want to see around future mass rapid transit stops?

Public shared spaces, Landscaped spaces/plantings, Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other:

9. To what extent do you agree or disagree with the following statement:

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Neutral

10. COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighbourhood in a different way.

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

refer to attached submission document

What amenities or facilities were missing or could have been improved?

refer to attached submission document

Non-Compulsory Questions

1. What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

refer to attached detailed submission document

2. What would you change or improve?

refer to attached document

3. Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

refer to attached document

4. To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs:

4.1 The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

4.2 The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Agree

4.3 The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Disagree

4.4 There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Agree

4.5 The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

4.6 There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Strongly Disagree

5. Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

5.1 Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Neutral

5.2 Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Disagree

6. Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statement?

6.1 The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Neutral

7. We also want to understand the public appetite for community planning processes in specific areas, such as:

Te Motu Kairangi/Miramar Peninsula

This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

Strathmore Park

This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighbourhood center.

Do you support the idea of a community planning process for the following areas:

7.1 Te Motu Kairangi/Miramar Peninsula

7.2 Strathmore Park

Not sure

8. If you answered yes, to the two questions above please respond to the following questions:

8.1 What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

8.2 What should the plan for regenerating Strathmore Park focus on or cover?

9. Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Neutral

10. Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Not sure

11. If you answered yes to the question above, what types of assistance would help landowners?

Other:

12. Are there any final comments you wish to include in your submission? If so, please provide your comments below.

The submission of Heritage New Zealand Pouhere Taonga addresses in details the potential impacts of the Spatial Plan on heritage resources. Please refer to the attached document for the details of our submission points.

Have you provided an attachment? Yes

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**Absolutely Positively
Wellington City Council**
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HERITAGE NEW ZEALAND
POUHERE TAONGA

Tairangahia a tua whakarere;
Tatakihia nga reanga o amuri ake nei
Honouring the past; Inspiring the future

30 September 2020

District Plan Team
Wellington City Council
PO Box 2199
Wellington 6140

Submitted via online portal

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON DRAFT SPATIAL PLAN

To: Wellington City Council

Name of Submitter: Heritage New Zealand Pouhere Taonga

1. Thank you for the opportunity to make a submission on the Wellington City Draft Spatial Plan.
2. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.
3. A note on the consultation process: The use of the Story Map approach and the interactive on-line platform is commended. For professionals (planners, architects, etc) it is accessible and a convenient way to understand the draft plan. However we have received feedback from members of the public that it is hard to understand the layers of planning information, and that it is hard to gain an understanding of the overall changes proposed. These issues are particularly the case for those who have limited internet access or experience in using the internet.

General Comments

4. We acknowledge the policy direction of the National Policy Statement for Urban Development (NPS-UD) which requires intensification of areas in proximity to commercial centres and transport hubs. It appears that the Spatial Plan has been developed to align with this policy direction. One significant requirement of the NPS-UD is the need to justify any restrictions on heights and density within a walkable distance of the City Centre.

5. The NPS-UD requires councils to provide for at least 6 storey development within walking distance to a City Centre Zone (equivalent to the Central Area Zone in Wellington). The Central Area Zone currently encompasses the central Wellington area, the Railway station area, and the Te Aro flats. However if the City Centre Zone were to be limited to Wellington Central or the 'High City' area then the area impacted by NPS-UD would be substantially lessened and would largely exclude areas like Mt Victoria and Aro Valley while at the same time including Te Aro. This approach would allow Council to fulfil the requirements of the NPS by facilitating development in the most suitable areas (Te Aro, Cambridge Terrace, etc) while at the same time removing development pressure from some of the most sensitive character suburbs.

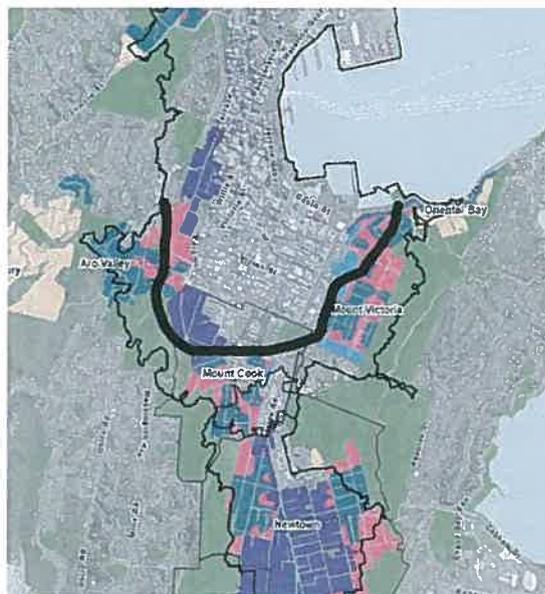


Figure 1: NPS-UD Affected Areas reduced

6. The approach taken by Council has the potential to result in a substantial amount of additional housing within the next few decades. However the future growth will not be concentrated in any particular areas, but will be facilitated across all of Wellington; in the central city area, in the inner suburbs, and also in the outer suburbs. The development of new housing in each of these areas will not progress in a planned or coordinated manner, but will rather depend on the availability of properties and the whims of developers.
7. In our view this approach could be described as 'scattergun' and is likely to lead to a patchwork of higher density housing, interspersed throughout the low-density townscape, and a disjointed urban landscape. It would be a better approach to concentrate higher density in certain areas and earmark these areas for growth, and then in the future look for other growth areas. A more staged approach to growth would allow for an increase in density in the most suitable areas, and would simultaneously ease the pressure on some of the more sensitive areas. The NPS-UD anticipates a staged approach, referring a number of times to providing for growth in the short-term, medium-term and long-term.
8. There are areas within the city, for example Te Aro, where a higher density and increased heights would be appropriate and welcomed. It is our view that the most suitable areas should be prioritised and that the areas more sensitive to change should be left off the higher density agenda.
9. The Spatial Plan refers to 'maintaining a continued emphasis on streetscape character and building design ... to ensure that new development respects the local streetscape'. The Draft Spatial Plan does not contain any detail of a design guide for the character areas, although diagrams of the different housing typologies are included. The effectiveness of any design guide will depend on its content, approach and statutory weight.
10. A well-considered design guide will be essential to aesthetically and successfully integrating all new construction within any character area. Design guides should not provide uniform and "off the shelf" rules and advice, but rather take into thoughtful account the character-defining features for which an area has been recognised. Design guides are not intended to foster replication of historic or heritage design, but rather encourage compatible new design. A guide presents a clear

understanding of the basic design features that make up the visual character of an area, features that make it notable, appealing, and worth preserving. They address such things as size, scale, form, function, siting, materials, colour, and vegetation, and others. Design guides should make specific rules and recommendations about allowable and appropriate new additions to a character area. For example, in an area where small-scale heterogeneous buildings contribute to the predominate character, any changes that might allow for larger-scale buildings having a more uniform design should not be approached as monolithic wholes, but broken up using massing techniques, varied materials, and stepping up and stepping down in height in response to adjacent buildings.

Inner Suburbs

11. Within the Inner Suburbs the approach of the Spatial Plan is based in part on the assessment of character areas. It is pertinent to comment on how the character assessment relates and intersects with heritage values of these areas. Assessment of heritage values in general includes consideration of aesthetic, architectural, cultural, historical, and social values. For an area or building to be recognised as having high heritage value it is not necessary to satisfy all the criteria. We would submit that many of the areas which have been identified as character areas in the Spatial Plan could just as readily be referred to as Heritage areas, as they contain strong architectural, aesthetic, and community association values.
12. The Spatial Plan bases the identification of character areas largely on 'streetscape character'. While it is true that the community values the inner suburbs for the streetscape character, the value and contribution of the character areas runs much deeper than streetscape. These areas are rich with meaning and history. These suburbs play a role in telling the story of who we are and where we have come from. Decisions on the protection and retention of our character and heritage areas need to be based on more factors than merely streetscape.
13. The character areas and 'sub-areas' within the inner suburbs are one of our main areas of concern with the Draft Spatial Plan proposals. The identified sub-areas within the character areas can best be described as 'patchy'.
14. Of primary concern is that there are many areas identified in *the Boffa Miskell Pre-1930 Character Area Review* as having 'primary and contributory' characteristics which have not been included in the sub-areas. The Spatial Plan refers to the fact that the character areas meet the requirements for a Qualifying Matter under the NPS-UD because a site-by-site assessment of character has been undertaken. However the Council's own evidence of heritage and character values in these areas is not being followed, and there are many areas of high character value that are proposed to not be exempt from the NPS-UD requirements for high density development.
15. The identification of character areas is based on a cut-off date of 1930. This is a somewhat arbitrary date, which excludes significant character and heritage from the 1930's, 1940's as well as modernist post-war architecture. The cut-off date over time will become more problematic – at the current time it excludes any built heritage less than 90 years old; however over the life of the Spatial Plan/District Plan 95 to 100 year old heritage will also be excluded. If a cut-off date needs to be identified 1945 would be more logical as a significant mid-century year.

16. In all the inner suburb character areas there are significant heritage character areas not included in the proposed sub-areas. We have verified by site visits that there are indeed significant heritage character areas which are identified as such in the *Boffa-Miskell* Report but not marked as sub-areas.

17. The spatial plan proposes to re-zone parts of Thorndon east of the motorway from Residential to Central Area. While some segments of these residentially zoned areas have been substantially changed, there are still significant pockets which retain a residential scale, and display unique heritage and character. While Thorndon has been severely impacted by past developments, the heritage and character of this unique place should be retained as much as practicable. The areas which retain residential and heritage character (most of Hobson Street, Hobson Crescent, Davis Street, Portland Crescent, and Selwyn Terrace) should be retained as residential heritage character areas.



Figure 2: Residential Land use in Thorndon

18. It also needs to be noted that **Berhampore**, although listed as an Inner Suburb, is largely outside the area 'impacted by the NPS-UD'. As such there is less obligation or pressure to increase the density in this suburb to the degree proposed.

19. Regarding **Newtown** we are concerned about the density of development proposed, with a substantial area identified for 'at least six storey' development. It appears the rationale for the inclusion of Newtown in the area 'impacted by the NPS-UD' is the expectation of a Mass Rapid Transit (MRT) system in and through Newtown. The planning for MRT through the Let's Get Wellington Moving alliance is in its early days and it is presumptive to make the assumption that the MRT will indeed be present in Newtown and that the whole suburb is thereby an area 'impacted by the NPS-UD'.

20. Our submission is that **at a minimum the areas identified as 'primary and contributory' in the Boffa Miskell Report be included as sub-areas.**

21. In this submission we will give some examples of areas and streets which are worthy of inclusion in the proposed sub-areas. The examples we give should not be taken as an exhaustive list, and there will be a need to a more fine-grained analysis to determine the most appropriate boundaries for the character sub-areas and the areas earmarked for the different housing typologies and heights.

22. For each of the inner suburbs we have provided further comments and illustrations of alternative boundaries of character sub-areas and areas of housing typologies/densities. These are attached to the submission at Appendix 1.

Commercial Heritage Areas

23. There are several inner suburb commercial areas that are recognised and identified in the Operative District Plan as heritage precincts. These heritage areas are located in Thorndon, Aro Valley, Berhampore, and Newtown.

24. There is a conflict between the character of these heritage areas and the housing typology and heights proposed in the Spatial Plan. For example the Spatial Plan shows 3 to 4 storey development (type 3) within the Aro Valley Heritage Area, and within part of the Thorndon Heritage Area. The height proposed for Berhampore (including the Heritage Area) is up to 6 storeys (type 4a). In all of these heritage areas the appropriate scale of development on the street frontage is 2 to 3 storeys.



Figure 3: Indicative Newtown Streetscape (from Spatial Plan)

25. Newtown contains two commercial Heritage Areas (John Street intersection and Newtown shops). The height limit in these areas is, under the Operative District Plan, 12 metres. Promoting at least six storey buildings in these areas will destroy the special character of these heritage areas, and the result will NOT look like the illustration shown here.
26. We request that these existing commercial heritage areas remain, and that the areas deemed suitable for anything over 2 to 3 storeys be restricted to outside these precincts.

Other Areas

27. The existing Heritage Character Area of The Terrace is proposed to be part of the six storey development area and is not proposed to be retained as a character area. This proposal is likely to lead to the loss of significant heritage character, as illustrated here. This part of The Terrace remains as one of the last straight streets of heritage character within Wellington. This streetscape is increasingly rare and is worth protecting.



Figure 4: 219 The Terrace

28. Regarding the Outer Suburbs we note that the intention is to undertake further investigations on heritage matters in some of the suburbs. We support the intention to undertake heritage assessments in Tawa, Johnsonville, Ngaio, Khandallah, Hataitai, Kilbirnie, Miramar, Lyall Bay, Brooklyn, Kelburn, and Island Bay. The heritage values of the other outer suburbs, for example Karori, should also be investigated and the findings fed into the planning process for the suburb.
29. It is noted that it is proposed to do away with the existing Holloway Road character area, although the area is to be kept as a low density housing area, with detached housing of 1 or 2 storeys. The removal of the character area overlay from this area is not justified in terms of the need to increase

housing density. Although there is a somewhat variable level of coherence in this area, there are still a high proportion of contributory and primary properties within this area.

30. Regarding the central city areas where increases in height and density are proposed (including the Transition areas and Adelaide Road), in general these areas are suitable for intensification. However it is important to consider the potential impacts on lower height residential areas and streets on the edges of these areas. In these transition areas and on the edges of different zones/housing density areas there is the potential for significant impacts in terms of character and heritage, as well as amenity values, including shading, daylight access and a sense of overlooking.
31. One example of an area of potential conflict is Hania Street in Mt Victoria (an eight storey transitional area) which abuts the character sub-area of Moir Street, a narrow street of small 1890s and 1910s cottages. There needs to be careful assessment of the edges of the areas of intensification in terms of sensitive residential areas, heritage properties, and public open space. There needs to be a careful stepping down from high rise to mid-level to low-rise residential areas.

Conclusion

32. In conclusion, the spatial plan is not providing the right balance between the need for more housing and other development, and the need to preserve the heritage and character which makes Wellington such a special place. Of most concern is the extent of inner suburbs heritage areas which stand to lose their special character under the provisions of the Spatial Plan. We submit that heritage and character can be better provided for and protected, while still meeting the objectives for growth and change.

Yours sincerely



Jamie Jacobs
Kaiwhakahaere Matua / Director
Te Takiwā o Te Pūtahi a Māui / Central Region

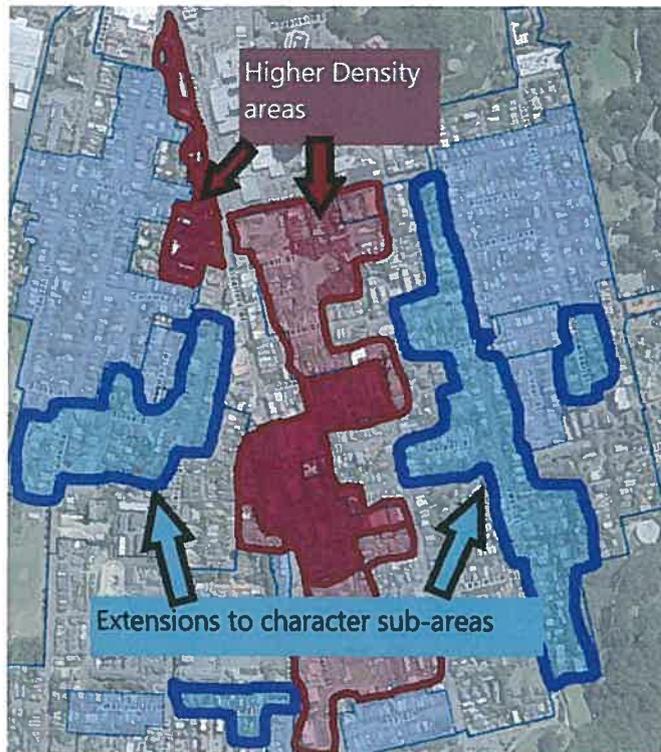
Address for service:

Heritage New Zealand Pouhere Taonga
Te Tari o Te Takiwā o te Pūtahi a Māui / Central Region Office
PO Box 2629
Wellington 6140

Contact person: Dean Raymond, Kaiwhakamāhere / Planner
Email: draymond@heritage.org.nz

Appendix 1: Further comments and suggestions on Inner Suburbs

NEWTOWN



Alternative Boundaries for character sub-areas and higher density areas in Newtown

The spatial plan for Newtown includes a large area earmarked for at least six storey development, including some areas where there is a high concentration of character houses. With regard to Newtown our main points are:

- Retain the character and scale of the Newtown and John Street Intersection commercial heritage areas and don't allow for six storey development in these areas
- Extend the character sub-areas, covering most of the areas determined to be 'contributory and primary' in terms of character streetscape
- Provide for six storey development limited largely to the areas currently zoned Business and Centre (excluding the commercial heritage precinct), with an area for potentially up to six storeys adjacent to the Business/Centre Zones
- Both Rintoul St and Harper St shown below are examples of streets with significant heritage character values which are within the area planned for up to six storey re-development



25 Rintoul Street



15 Harper Street

THORNDON



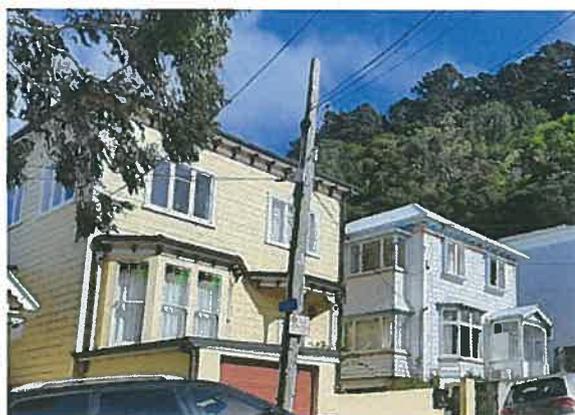
Thorndon showing extended character sub-areas in blue

We acknowledge that the housing typology and scale proposed for Thorndon will be limited to 2 to 3 storeys. This approach will help to maintain the scale and character of the suburb.

The Spatial Plan shows several discreet character sub-areas within Thorndon. We submit, based on the heritage and streetscape characteristics of these areas, that several additional areas should be included as sub-areas. Within the locations we are proposing as sub-areas, even though there are several detracting properties, the majority are primary and contributory. The properties illustrated below are good examples of places that should be included in the character sub-areas.

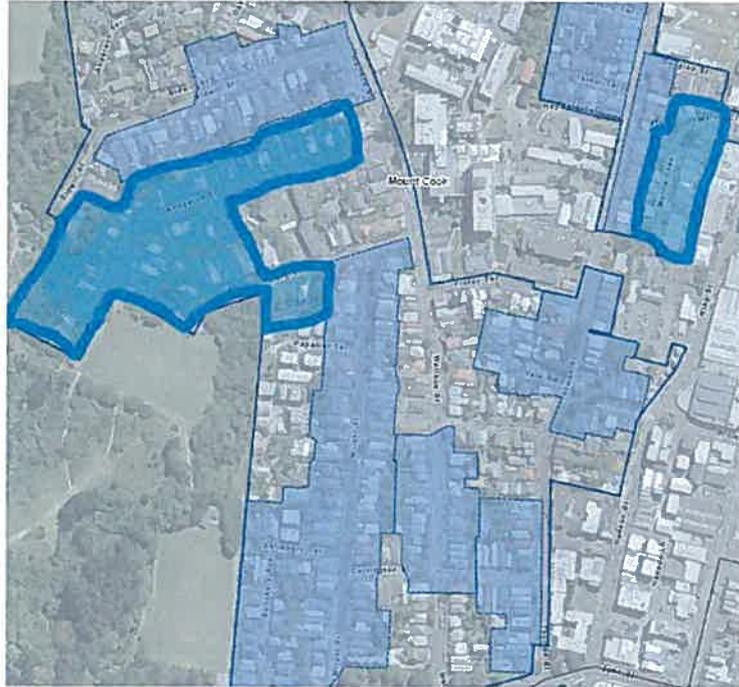


231-235 Tinakori Road



15 and 17 George Street

MT COOK



Extensions to Mt Cook Character Sub-Areas

Mt Cook includes a substantial number of properties and streets which have high level of cohesiveness and integrity but in the Spatial Plan are earmarked for development up to six stories, and where pre-1930's buildings are not protected. Good examples are Rolleston Street, the western end of Hargreaves St, and Myrtle Crescent. The eastern side of Myrtle Crescent is particularly sensitive, as there is a row of single storey 1900's cottages which abut the proposed Adelaide Road central city extension area.



84 Rolleston St



27 Myrtle Crescent

ARO VALLEY



Aro Valley showing extensions to the character sub-areas

Aro Valley is a distinctive inner city suburb characterized by generally low-scale development with a high level of cohesiveness. The geographical setting of an east-west valley with steep hillsides on both sides renders this area unsuitable for high density development. In planning for appropriate building heights and densities in this geographical context amenity values need to be carefully considered, including daylight access and shading.

Housing heights and density should be limited to Type 2 (2 to 3 storey) throughout the whole area, with the exception of the section of Aro Street east of Ohiro Road. There are a number of areas which should be included in the character sub-areas, as shown in the map above.



205 and 207 Aro Road – should be included in character sub-area