



Historic Places Wellington Submission
WCC Draft Spatial Plan



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MEMBERSHIP

1. Historic Places Wellington (HPW) is a registered charity and incorporated society that promotes the identification, protection and conservation of historic places in the Wellington region for the benefit of the community and the general public. HPW makes this submission on behalf of its 120 members. It wishes to be heard in an oral submission process.

KEY POINTS

- An important part of Wellington's distinctive heritage is determined by its wooden houses nestled on hillsides and valleys – it is more than “character”.
- The pre-1930 demolition rule in its inner city heritage suburbs has helped retain that.
- HPW opposes any diminution of that rule.
- Intensification should be phased according to short, medium and long term housing needs.

TIMBER, OUR NATURAL HERITAGE

2. Some say the old houses in Wellington's inner city suburbs are symbols of ‘colonialism’ and have no place in a post-colonial world. The statement is simplistic. Many earlier owners and occupants were pawns in the colonial system escaping from poverty and servitude in their homelands.
3. The old timber houses remind Wellingtonians of sometimes shameful acts of the past but it is not a bad thing. The deforestation of Aotearoa saw trees felled to clear land but also to build houses. The timber was exploitatively exported and also used locally. Wellington's 130 year old cottages and villas typically have centuries old heart matai flooring and heart rimu weatherboards. It is said to be ‘as hard as steel’. Windows and doors are crafted in totara, rimu and kauri. If the wood is kept dry, it will last another hundred years or longer. Unlike Europe, Aotearoa has no termites or woodworm, only borer and they can be controlled. Aotearoa's low-land native forests have largely gone. Let us not destroy the wooden houses too. That would be a travesty.



TIMBER, RESILIENT AND SUSTAINABLE

4. Old wooden houses are resilient. Light and flexible timber frames allowed many houses to survive the Napier and Christchurch earthquakes. Demolition of this built resource and re-building in modern manufactured materials with high

embodied energy is not a ‘green’ solution. It is wasteful of the planet's resources. Timber framed houses can be easily adapted to create space for more occupants. A Victoria University study found clever adaptations using attic spaces, basements, additions and outbuildings. Retrofitting for better thermal insulation and draught-

proofing under floors, in walls and ceilings is now standard practice. Roof lights can be effectively used to increase natural lighting.

DESIGN HISTORY

5. Timber villas are steeped in history. The proportion of rooms, windows and doors are classical, originating from ancient Greece. The design detail of mouldings and decoration are based on 19th Century European pattern books. This old design wisdom continues to give aesthetic pleasure and charm. Over time, owners renovate and embellish their homes in the own cultural traditions creating the rich tapestry of who Wellingtonians are.

LIVING WITH OUR PAST

6. Living in an old house allows a gleaning of the experience of our ancestors. This is an intangible gift of a sense of identity and belonging. Smaller houses speak of a time when life was materially simple and sustainable. Ones clothes filled a single wardrobe. Kitchens were simply a kauri sink-bench, a stove, a safe to keep milk and vegetables cool, a dresser for crockery and cutlery and a central table. The table doubled as a work surface and the family gathering place. This simplicity is close to the minimalism that is aspired to today. This heritage embodies values of sustainability and should be treasured for passing on to next generations.

PROTECT HERITAGE LISTED SITES AND AREAS PART 3.32(1)(a), (e) & (h) NPS-UD

7. HPW is ready to contribute constructively to the identification of heritage sites suitable for specific listing and protection both within and outside of inner city heritage suburbs. That relates to the identification of “qualifying matters” under Part 3.32(1)(e) National Policy Statement Urban Development 2020 (NPS-UD).
8. HPW supports the retention of all listed properties, except those which clearly merit removal (such as 128 Abel Smith St).
9. HPW proposes the introduction using Part 3.32(1)(a) and (e) NPS-UD of
 - Stepped down levels of intensification next to low rise Heritage sites and areas, including residential heritage suburbs
 - Transition zones adjacent to sites of significant historic heritage;



Plimmer House surrounded by tall buildings

- 100 meter buffer zones around those sites; and

- The protection of views of major heritage buildings. For example, views towards the Carillon, St Gerard's Monastery and other publicly enjoyed built heritage.



10. HPW supports the retention of heritage listing for groups of business buildings within heritage suburbs. Those areas together with school sites were the heart of the inner city heritage suburbs.

11. HPW supports the re-purposing of those buildings to residential ground floor use. For example listed shops in Aro Valley, or Newtown may be appropriately re-purposed while maintaining the large front window heritage style of past use.



12. HPW does not oppose the building of adjacent higher buildings accessed through heritage area business buildings. Good design could ensure the integrity of the heritage building is maintained while utilising the rear of those sites for more intensive re-development. For example in Newtown, shops and two storey frontages

might have re-developed adjacent back buildings which involve higher buildings set back from the front shops.

13. HPW opposes the retention of only the facade of such buildings, however.

14. HPW supports three-storey buildings in the historic business areas between heritage listed buildings with provisos and consideration of the heritage context of the area.

PROTECT INNER CITY “HERITAGE” SUBURBS NPS-UD PART 3.32(1)(a), (e) AND (h)



15. HPW is opposed to the Draft Spatial Plan proposals relating to the inner city suburbs of Mt Victoria, Thorndon, Aro Valley & The Terrace, Mt Cook, Newtown and Berhampore. (Aro Valley includes Holloway Rd). HPW refers to those suburbs in this submission as “heritage suburbs”.

16. It is important to consider the extent to which WCC is required to intensify those suburbs under NPS-UD. HPW explored this issue with the Ministry for the

Environment (MfE), the administering Government department (F Wong/K Guerin meeting 2 Oct 2020). MfE advise that there is a discretion on WCC's part relating to the treatment of heritage and/or character (under Part 3.32(1) NPS-UD).

17. HPW proposes that the inner city heritage suburbs be treated as collections of buildings which represent historic heritage ("qualifying matters" under Part 3.32 (1)(a) NPS-UD) but which individually may not warrant scheduling as significant historic heritage places or areas of "qualifying matters" under Part 3.32(1)(e).
18. This "heritage" is currently recognised in the District Plan by a number of rules and provisions relating to heritage and character within the "character areas". WCC has a discretion as to how it treats these suburbs in terms of implementing the required intensification under NPS-UD. It is not required to use only Part 3.32(1)(h) to identify the "qualifying matter" applicable to some or all of those suburbs as "character". HPW notes therefore that WCC may exercise its discretion to completely exempt these suburbs from intensification on the basis of their status as "qualifying matters".
19. The housing stock is already characterised by closely developed stand-alone houses, often on small sites, with minimal yards and little provision for off street parking. These suburbs are the original "walkable" 15 minute suburbs, most of which still do not rely on vehicle transport more than 140 years after their establishment.
20. The protection of historic heritage is a matter of national importance and in this regard the Council should continue to approach the future planning of the suburbs from the perspective of protecting, enhancing and promoting them as valuable heritage assets. That policy approach should not be abandoned in favour of the radical erasure of Wellington's heritage and identity.
21. The recognition of "heritage status" under Part 3.32(1)(a) NPS-UD is proposed by HPW for all of Thorndon, Mt Victoria and Aro Valley, including Holloway Rd. The revised housing assessment of future demand can be met within the existing District Plan rules for those suburbs. Much of Mt Cook, Newtown and Berhampore could also enjoy similar heritage overlay and accommodate demand levels with smaller areas of intensification as designed by the communities themselves.

DEMOLITION CONTROLS

22. The requirement under District Plan Rule 5.3.6 (etc) to obtain a resource consent prior to demolition of a pre-1930 building in those suburbs is the key provision protecting the heritage (and character) of them. The heritage element of the buildings and their character is entwined and cannot artificially be separated. HPW regards these suburbs as heritage suburbs with significant heritage value which merits recognition as a "qualifying matter" under Part 3.32(1)(a) of the NPS-UD.
23. HPW also supports the continued recognition of all inner city heritage suburbs as character areas with specific rules relating to them in the geographic areas covered under existing District Plan provisions.

24. HPW calls for the retention over all inner city heritage suburbs of protection provided by the rule requiring a resource consent prior to demolition of pre-1930 buildings. The demolition control rule has worked well to preserve the character and heritage of old houses in those suburbs
25. The demolition control is not a rule prohibiting demolition but a rule which requires good process and all the facts to be considered. HPW believes the rule has been badly implemented by WCC which has not applied its discretion appropriately.
26. HPW notes areas proposed for removal from demolition protection are as follows:
PERCENTAGE DIFFERENCE
- Aro Valley 73%
 - Berhampore 85%
 - Mt Cook. 57%
 - Mt Victoria. 62%
 - Newtown. 73%
 - Thorndon. 59%
 - The Terrace 100%
 - Holloway Road 100%
27. HPW opposes the proposal to remove from such large areas the demolition controls and draws attention to the Boffa Miskell report of February 2019 which found that 70-80% of the buildings in these suburbs are either “positive” or “contributing” to the suburb’s intact character. HPW opposes the reduction in coverage of protection in sub-areas to an average of only 20-30% of the suburbs proposed by the DSP.
28. HPW notes the Boffa Miskell report relating to areas retaining demolition controls should be much wider. At the very least the Character sub-areas should accord to those proposed in the Boffa Miskell report. HPW draws attention to the specific extended sub-area proposals in Heritage New Zealand Pouhere Taonga’s submission in that regard.
29. The scale of the proposed removal from protection of old houses is completely unacceptable and fully rejected. HPW objects to the removal of The Terrace and Holloway Rd from Character Area status. HPW objects to the removal of Character Area status from Selwyn Terrace, Hobson St and Cres, and Portland Crescent in Thorndon. HPW supports the addition of Character Area status to Bolton St, Kinross St and Easdale St.
30. HPW opposes shifting the focus of rules applicable in the inner city suburbs to substantially limited matters related to residential character and amenity value such as streetscape which results in a few small areas and discreet streets (identified as “character sub-areas”) being proposed for exemption from intensification under NPS-UD Part 3.32(1)(h).



31. Such treatment negates arguments supporting the protection of heritage and favours the development of more intensive forms of housing in areas outside of character sub-areas but within “character overlays” in the wider heritage suburb area.

32. HPW opposes the range of measures promoting new housing development in these heritage suburbs

until the detailed District Plan draft rules are available to be considered. It is not possible yet to evaluate the full impact of the DSP. Encouraging denser housing forms will result in the ongoing loss of valuable heritage housing stock and the erasure of the character of Aotearoa’s oldest suburbs.



33. Local residents of heritage suburbs highly value character (e.g. streetscape, proximity to historic business areas, sites of significant historic heritage, historic schools, existing medium dense mixture of housing choices, one- or two-storey homes, safe streets, open spaces behind dwellings, access to and enjoyment of sunlight, etc), all of which should be retained.

ENVIRONMENTAL BENEFITS OF HERITAGE

34. HPW believes that retaining older buildings is essential to making urban environments more sustainable. International research has identified that nearly 40 percent of all greenhouse gases are produced in the construction, demolition and operations of buildings. Most new buildings erected in the present are built for a 50-year lifespan, meaning they will not survive long enough to repay the amount they cost in carbon to construct.

35. Conversely, preserving older buildings contributes to climate change solutions by storing energy (often called embodied energy) and becoming carbon reservoirs. Demolishing buildings intensifies landfill pressures and increases demand for finite raw materials to create new building products. As the American architect and sustainability expert Carl Elefante famously put it: ‘We cannot build our way to sustainability; we must conserve our way to it.’ This means moving away from the mindset that ‘new is always better’ to ‘recycling comes first’. Adaptive re-use rather than demolition should be our first impulse.

36. HPW acknowledges that retaining every building in the existing character areas is not practicable if intensification is to occur in sustainable ways, but we also want to ensure that every effort is made to avoid unnecessary demolition or wasting of building resources. The sub-character areas identified in the DSP should therefore be extended to realise both aims.

QUALITY BUILT ENVIRONMENT



37. Rather than copying housing solutions from larger and different types of cities, Wellington should be more innovative and devise answers appropriate to the scale of the future need and that fit with the communities in heritage suburbs. Apartment blocks as adopted in Melbourne or Portland are not appropriate for heritage suburbs. Design must reflect the context of the local heritage area.

38. Existing District Plan rules and their enforcement do not protect residents from inappropriate development now. This requires urgent attention and Council needs to demonstrate it can effectively manage existing rules before considering a different set.

39. A tiny percentage of all building consents have reached the threshold in a development needed before a resource consent is required. As a design assessment can only be required on resource consent applications nearly 99% of all building consents will not be subject to design assessment unless they fail one or more development rules. Coverage, height to boundary, yard and other controls are all signalled to be significantly relaxed. HPW doubts design guides will protect heritage context in inner city heritage suburbs.

COMMUNITY COLLABORATION/CO-DESIGN

40. The planning process needs to take into account the whole suburbs and their infrastructure needs and be undertaken in collaboration with the communities concerned. That should culminate in a holistic plan for the future of the inner city heritage suburbs. Only then should a Design Guide be developed (not the other way around as is proposed). Council's claims that there will be high levels of design control are illusory given that in the great majority of residential developments the level of design control (including development rules) will be reduced.

PLAN FOR PHASED INTENSIFICATION

41. HPW supports housing choice and supply solutions that best meet the current and future needs of the community but opposes inappropriate subdivision and development at the expense of heritage (s.6(f) RMA).

42 In the absence of strategic material about infrastructure, transport, schools, and health care provision, required by NPS-UD, the DSP is nothing more than a policy for city rezoning, which includes deregulation of building height limits and removal of process controls for demolition in heritage suburbs.

- 43 NPS-UD requires intensification to be planned in the short, medium and long terms (Policy 7). Supporting documents have not been so prepared. HPW calls for phased rezoning of the city. This would result in areas identified for immediate transformation (working with the development sector as mandated in Policy 10(c) of NPS-UD), areas for development in the medium term and then long term respectively. The phasing should be “triggered” by review of actual population trends and by updating the HBA as required by NPS-UD.

RIGHT SIZING CITY CENTRE ZONE

- 44 NPS-UD makes certain requirements for intensification within a “walkable catchment” of the city centre. For the purposes of NPS-UD the city centre zone should be the geographic zone currently identified in the District Plan as the “high city”. The “low city” should be outside that zone and should be a residential zone within its “walkable catchment”. This aligns with current 6 storey provision for intensification in the low city.



- 45 Furthermore, the city centre should have a number of distinct smaller precincts within it in order to better plan intensification along with community needs such as green space, and local infrastructure. It is unacceptable that sewage is removed from holding tanks in apartment blocks now because underground sewage systems cannot currently cope with additional loading (e.g. the Sharp Building in Taranaki St - Councillor Young, Thistle Hall 25 Sept 2020).

PHASE FOR RAPID TRANSIT DECISIONS

- 46 There is no current agreement about the location of planned rapid transit within Wellington in terms of NPS-UD Policy 3(c)(i). There have been discussions and feasibility studies for many years about general direction (through Newtown or Mt Victoria) but no decision. It is reasonably foreseeable that there may not be rapid transit in Wellington because of cost/benefit realities.
- 47 In the absence of a decision about the specific direction of rapid transit, there is no “planned” rapid transit stop within the terms of NPS-UD. Accordingly any proposed intensification should only be “triggered” once such a decision is made. Proposing deregulation of building heights because of non-existent planned MRT stops is therefore inappropriate.
- 48 Both Newtown and Berhampore are heritage suburbs. Newtown should not therefore be subject to intensification of at least 6 storey buildings in the short term, unless in a carefully contained manner. For example, as proposed by architects Hanley-Welsh which provides an additional 2000 plus homes without unduly affecting residential heritage areas. HPW supports collaboration with heritage suburb residents in developing such plans.



49 WCC has advised that “Berhampore has been identified as a good place for intensification because of its proximity to the Programme Business Case MRT route through Newtown, proximity to Newtown centre and services, and its straightforward transport route to the central city”. However, there is no requirement for at least 6 storeys in Berhampore which is not within a “walkable catchment” of either a city centre or any planned rapid transit stop. There is accordingly no justification for Berhampore intensification to the extent proposed.

Hanley-Welsh Intensification Plan for 2000 plus units, Newtown Sept 2020

NPS-UD 2020 NON COMPLIANCE

50 The RMA obliges the Council to give effect to higher order planning instruments (e.g. national policy statements. The NPS-UD contains important direction which WCC is not complying with.

51 HPW objects to the assumption used in both the DSP and the online public consultation form, of the highest population projection provided for Wellington over 30 years (80,000). HPW notes the NPS-UD requirement to plan using “most likely” assumptions (Part 3.24(5)(c) & (d)).

Statistics NZ places a 50% probability on growth being 46,000 pre-COVID but only a 10% chance it would reach 80,000. The figure used should be 46,000.

52 HPW requests that the short and medium projections be further re-calibrated in light of the changes from COVID. Evidence about increased demand for Kapiti and Hutt Valley property needs to be considered post-COVID through the preparation of a regional housing bottom line, prior to preparation of a Housing and Business Land Assessment for Wellington (HBA) in accordance with NPS-UD Part 3).

53 A Future Development Strategy is also required to be completed by NPS-UD (Part 3.12). To adopt the DSP about intensification in advance of those analyses constitutes a failure under s.83 LGA. The hasty attempt to superficially meet NPS-UD 2020 height limit requirements resulted in a DSP which grossly over provided for capacity. HPW understands it provides 7 times the amount of capacity required under NPS-UD 2020. A crude estimate is that upzoning in Newtown alone would provide more than 30,000 additional units in that one suburb. HPW has requested

modelling of capacity provided by DSP but been declined that fundamental information.

- 54 Following the experience with preparation and adoption of the Auckland Unitary Plan, improvements were made by NPS-UD 2020, in particular the identification of matters which would qualify for exemption from intensification. Those matters include heritage under NPS-UD Part 3.32 (1)(a) and (e).
- 55 Other matters (e.g. character and amenity) may be exempted under Part 3.32(1)(h) but require site by site identification. WCC has not identified all qualifying matters under NPS-UD 2020, and has wrongly used Part 3.32(1)(h) for matters relating to heritage. It should use Part 3.32(1)(a) and (e) in addition to Part 3.32(1)(h) in relation to intensification in inner city heritage suburbs. See below for further discussion of this point.

LOCAL GOVERNMENT ACT CONSULTATION NON COMPLIANCE

- 56 HPW has significant concerns about the quality of the consultation process and the flawed and leading WCC submission form. Primary use of web based materials is not resulting in sufficiently widespread availability of information to meet the principles of Local Government consultation (s.83 LGA). Advice to persons affected has not been given in an accessible manner and should have been included in rates notices. Engagement has not complied with WCC's engagement policy. HPW members have actively provided information to residents to remedy WCC's consultation shortcomings by printing maps and information brochures and delivering them to households in inner city heritage suburbs.
- 57 The status of the DSP has been unclear as regards the requirements of the National Policy Statement on Urban Development (NPS-UD 2020). HPW relies on Moana Mackie's advice of 11 September 2020 that it is a policy document.



Wellington Residents Association Network at WCC, 26 September 2020