

**Before the Hearings Panel
At Wellington City Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing submissions and further submissions on the
Proposed Wellington City District Plan

**Stream 2 Reporting Officer Right of Reply of Mitch Lewandowski on behalf of
Wellington City Council**

Date: 26 May 2023

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RIGHT OF REPLY AUTHOR

- 1 My name is Mitch Lewandowski. I am a Resource Management Consultant and Director of Building Block Planning Ltd. I have been engaged by the Council as reporting officer in respect of the Character Precincts and the Mt Victoria North Townscape Precinct (MVNT Precinct).
- 2 I have prepared this Reply in respect of the matters raised during the hearing of matters in Hearing Stream 2.

3 I have listened to submitters in Hearing Stream 2, read their evidence and tabled statements, and referenced the written submissions and further submissions to the relevant Hearing Stream 2 topics.

4 I have also undertaken further site visits in order to inform my responses regarding the spatial application of the Character Precincts and the MVNT Precinct.

5 Part 1 of my Hearing Stream 2 Section 42A Report, at section 1.2, sets out my qualifications and experience as an expert in planning.

6 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

SCOPE OF REPLY

7 This Reply follows Hearing Stream 2 held from 28 March 2023 to 11 April 2023. Minute 17: Stream 2 Follow Up requested that the Section 42A report authors submit a written Right of Reply as a formal response to matters raised during the hearing.

8 The Reply includes:

- Feedback on matters raised directly by the Panel in Minute 17 as relevant to Character Precincts and the MVNT Precinct; and
- Feedback on matters raised by submitters.

9 Appendix 1 contains a table addressing the requirements of sections 77J and 77L of the Resource Management Act 1991.

10 Appendix 2 shows Operative District Plan Character Areas.

11 Appendix 3 maps areas in Lower Kelburn.

- 12 Appendix 4 maps all properties assessed as primary and contributory through the Pre-1930 Character Area Review.
- 13 Appendix 5 maps Indicative Character Sub-Area from the Pre-1930 Character Area Review.
- 14 Appendix 6 maps properties suggested by submitters for Mt Victoria.
- 15 Appendix 7 maps properties suggested by submitters for Newtown.
- 16 Appendix 8 maps properties suggested by submitters for Mt Cook.
- 17 Appendix 9 maps properties suggested by submitters for Thorndon.
- 18 Appendix 10 maps properties suggested by submitters for Berhampore.
- 19 Appendix 11 maps properties suggested by submitters for Aro Valley.
- 20 Appendix 12 maps properties suggested by submitters for The Terrace.
- 21 Appendix 13 maps the area requested by the Panel in Wadestown.
- 22 Appendix 14 maps 4 Vogel Street.
- 23 Appendix 15 maps 11-15 Brougham Street.
- 24 Attachment 1 contains an assessment of development capacity impacts prepared by Property Economics.

RESPONSE TO MATTERS RAISED IN MINUTE 17

- 25 Minute 17 raised the following questions from the Panel relating to Character Precincts and the MVNT Precinct:

- More generally in relation to Qualifying Matters, can Council Officers please provide a revised version of the table provided by Ms Woodbridge with an extra column setting out their response to her commentary.
- To what extent (in number of dwellings) did the ODP character area provisions restrict development capacity provided in that Plan?
- What assessment have Council Officers made of the area south of Bolton Street in relation to its potential inclusion in the Character Precinct provisions?
- Similarly, what is the Council Officers' response to suggestions by submitters that the identified character precincts in Thorndon, Aro Valley, Mt Cook, Newtown, and Mt Victoria be further expanded from the recommendations in the s42A report, and that an area of The Terrace be added? In this regard, we are looking for a street by street commentary on the additional areas proposed (rather than a more generic response). Please also advise what the effect would be on development capacity, broken down by suburb if they, and/or the Lower Kelburn area referred to immediately above, were included in the character precincts.
- What was the rationale for not including the area of Lower Wadestown identified by Boffa Miskell in the notified character precincts?
- Did the methodology applied for identification of character areas take into account listed heritage status of any buildings within a possible character precinct?- if so, how?

- In relation to the North Mount Victoria Townscape Precinct, should 4 Vogel Street be included within the precinct because of its visibility at the upper southern edge of the precinct?
- Can Council Officers please explain the logic of identifying 15 Brougham Street as part of the Character Precinct given its location on a back section and the fact that (according to its owner) similar buildings on the adjacent back sections (at 11 and 13 Brougham Street) are not identified as such?

26 The following section addresses each question in turn.

Qualifying Matters Table

27 In line with the Panel's direction, an updated version of Ms Woodbridge's table is provided in Appendix 1.

28 This update provides an additional column providing comment on the requirements of sections 77J and 77L.

Development Capacity Impact of Operative District Plan Character Areas

29 The question from the Panel was worded as follows:

“To what extent (in number of dwellings) did the ODP character area provisions restrict development capacity provided in that Plan?”

30 The Council does not have information on the development capacity impacts of the existing character areas under the Operative District Plan. Rather, the question has been interpreted as “what would be the development capacity impacts of the ODP character areas if they were carried over into the PDP?”.

- 31 Property Economics have assessed the spatial extent of the ODP character areas and considered the development capacity impacts if those were carried over into the PDP. That information is presented in Attachment 1.
- 32 Some submitters have suggested the inclusion of all character areas identified by the ODP in the PDP as Character Precincts.
- 33 This suggestion is not supported. The PDP is required to give effect to the NPS-UD and incorporate the MDRS. It may modify this only where a qualifying matter can be established. There is sufficient variability in the character contribution of individual properties within the ODP character areas that make their inclusion, as a qualifying matter, unjustifiable. In my opinion the areas I have proposed are those justifiable in terms of sections 77J and 77L.
- 34 There was some discussion during the hearing of the exact spatial application of the existing pre-1930 character areas. These areas are defined in Appendix 1 of the Residential Appendices to Chapter 5 of the Operative District Plan. I have attached these sections of the ODP in Appendix 2.

Lower Kelburn

- 35 This question refers to two areas in Lower Kelburn to the south of a proposed Character Precinct. The proposed Character Precinct is a continuation of an existing character area in the ODP.
- 36 Appendix 3 shows these areas along with the assessed character contribution.
- 37 The two areas were identified as 'contiguous areas' as part of the Boffa Miskell Pre-1930 Character Area Review. That is, they were identified as areas that were not presently a character area under the ODP, but that

warranted further investigation. They were subsequently assessed. The extent of the areas and their assessed character contribution are shown below. They are not presently character areas in the ODP.

- 38 The first area identified by submitters is framed by Bolton Street, Wesley Road, Aurora Terrace and San Sebastian Road as shown in Figure 1.

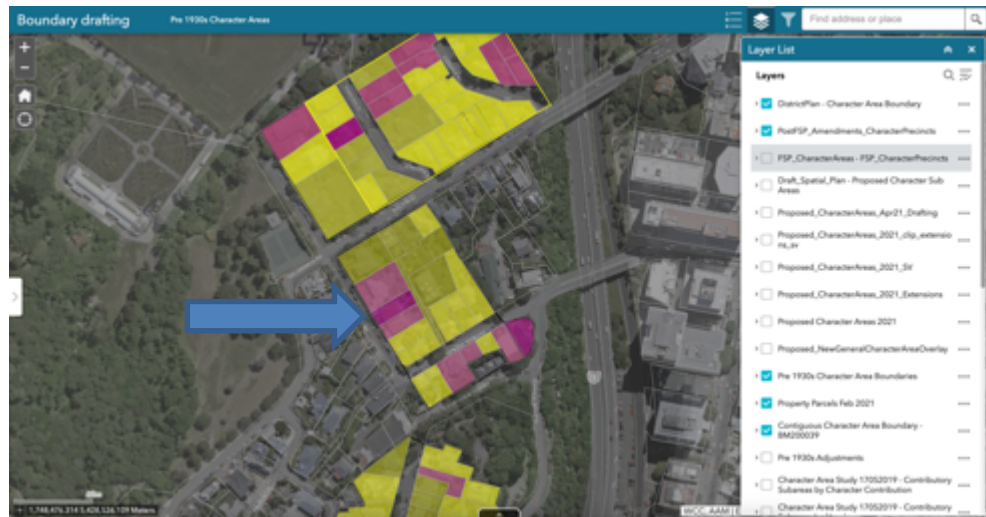


Figure 1. Lower Kelburn at Wesley Road.

- 39 Of the 21¹ properties in this area, 9 have been assessed as primary, with 8 of these located along Aurora Terrace. The remaining primary site is on Bolton Street. 2 properties are detractive and 5 are neutral. The balance, clustered on the northern side of the area, are contributory.

- 40 If a Character Precinct were to be created in this area, it would need to identify areas of concentrated character. The starting point is primary character which is clustered around Aurora Terrace, particularly its northern side. The southern side of Aurora Terrace contains two primary, three neutral and one detractive property meaning that it

¹ 11 San Sebastian Road has not been assessed as it was not identified as forming a part of the contiguous area. I note this property contains three modern terrace houses.

would be challenging to identify this area with reference to the adopted methodology.

41 Overall, there is sufficient variability in this area that leads me to the conclusion that it should not be included as a Character Precinct.

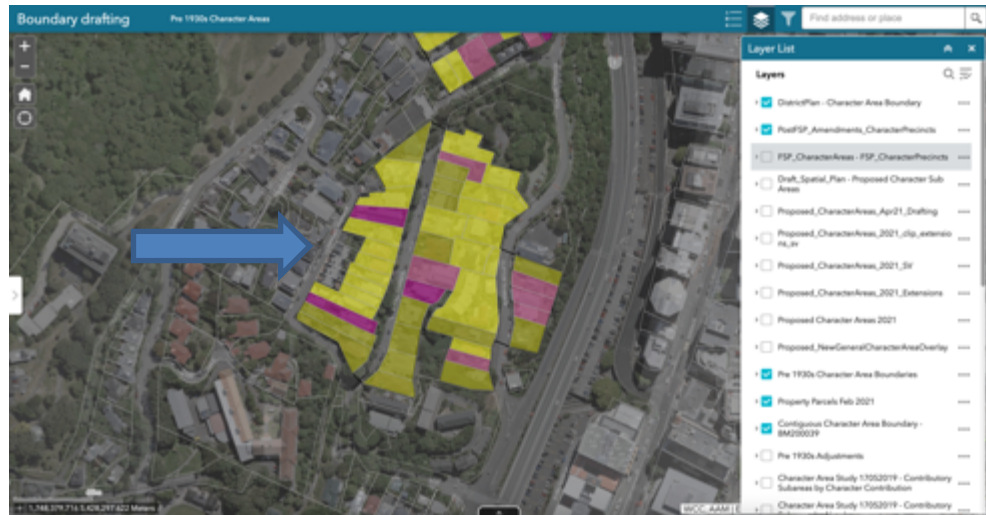


Figure 2. Lower Kelburn at Talavera Terrace and Clifton Terrace.

42 The second area in Lower Kelburn is centred on Talavera Terrace and Clifton Terrace. This area shows a much greater consistency of character contribution, with a greater contribution from primary buildings as compared to the Wesley Road area considered above.

43 There is a noticeable contrast between the eastern and western sides of Talavera Terrace with the western side having a greater concentration of primary buildings. A similar situation occurs on Clifton Terrace.

44 Based solely on the character contribution, the area could be considered as a Character Precinct. However, because the area is not presently a character area, exhibits a moderate degree of variability in character contribution, would result in an isolated island of character protection, and considering the requirements of the NPS-UD and MDRS, I do not recommend inclusion of this area as a Character Precinct.

Suggested additions (including specific additions to Mt Victoria, Thorndon, Aro Valley, Mt Cook, Newtown and The Terrace Character Precincts)

45 A number of suggested additions to Character Precincts were made by submitters at various scales, ranging from retaining existing ODP character areas, including all properties assessed in the Pre-1930 Character Area Review as being primary or contributory, to more site specific additions.

46 I address these requests below. In dealing with site specific assessments, I have addressed these on a street by street basis as requested, and have bundled together streets that form logical areas. The areas are mapped in the appendices referenced in each section.

47 The development capacity impacts of the suggested areas have been assessed by Property Economics as set out in Attachment 1.

48 As I discussed in the Section 42A report for this topic, I stress again that the delineation of the Character Precinct boundaries as recommended in that Section 42A report was undertaken through a process involving a number of Council staff, applying the methodology provided with that Section 42A report and balancing the requirements of the MDRS and Policy 3 of the NPS-UD.

49 I note again that there is an inherent subjectivity to such a process and that various people undertaking the task could in my view quite reasonably reach different conclusions about appropriate boundaries. This reality is very much reflected in some of the suggested additions requested by submitters.

Including all Primary and Contributory Properties

50 Some submitters have suggested the inclusion of all properties that were assessed as being primary and contributory through the Pre-1930

Character Area Review in addition to the Character Precincts already identified in the notified PDP, and the additional areas recommended through the Section 42A report.

- 51 To include all primary and contributory properties outside of the areas already identified would create a patchwork of properties with a significant number of gaps between properties where neutral and detractive properties are located. Appendix 4 shows these properties, mapped at a suburb scale, alongside the area recommended through the Section 42A report.
- 52 This would create an illogical pattern of Character Precincts. To adopt this approach would necessitate making further additions to form logical boundaries. Such additions would invariably include properties that have been assessed as being neutral or detractive, and would be contrary to the intent of identifying areas of concentrated character. Such an approach would further encroach into areas that have provided for the requirements of the MDRS and Policy 3 of the NPS-UD in a manner that in my view is not justifiable as a qualifying matter.
- 53 Resultingly, I do not support the suggested approach of including all primary and contributory properties as Character Precincts.

Including Indicative Character Contribution Sub-Areas identified by Boffa Miskell

- 54 The Pre-1930 Character Area Review identified 'Indicative Character Contribution Sub-Areas'². It did so by grouping areas of consistent

² At Appendix 4 at <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/reports/supplementary-documents/pre-1930s-character-areas-in-wellington-city.pdf>

primary and contributory buildings, and areas of consistent neutral and detractive buildings.

- 55 These areas were used as a starting point for the identification of the Character Precincts in the notified PDP, and the amended areas I recommended through the Section 42A report. They were not intended to be, as I discussed in the Section 42A report, recommended areas for inclusion in the PDP as Character Precincts.
- 56 Appendix 5 maps the Indicative Character Contribution Sub-Areas and contrasts them against the Character Precincts recommended through the Section 42A.
- 57 Overwhelmingly, the Indicative Character Contribution Sub-Areas are included within the proposed Character Precincts. There are minor areas, as identified in the appended maps, where areas identified as Indicative Sub-Areas have not been included. This has resulted from the application of the methodology developed by the Council, and treating the Indicative Sub-Areas as a starting point for the determination of Character Precincts.

Mt Victoria

Earls Terrace, Port Street and Stafford Street

- 58 The area is shown in Figure 3 below, and in Appendix 6:



Figure 3. Earls Terrace, Port Street and Stafford Street.

59 In respect of Earls Terrace, the rear property at 2 Earls Terrace is the solitary building that has been assessed as a primary building. The remaining houses on Earls Terrace are either contributory or neutral. Resultingly, Earls Terrace was not recommended for inclusion as the mixture of character contribution was too variable and without a sufficient grouping of primary and contributory buildings around which to form a Character Precinct.

60 In respect of Earls Terrace, the single sided nature of the street was not a determining factor, acknowledging that properties on Hawker Street form the western boundary of Earls Terrace.

61 Similarly for Port Street and Stafford Street, the variability of character contribution is considered too great to warrant a Character Precinct, when compared to other areas of more consistent character.

62 An Indicative Sub-Area was identified in part of this area as shown in Figure 4:



Figure 4. Indicative Character Sub-Area identified by the Pre-1930 Character Area Review.

63 This area picked up a section of Majoribanks Street and a small portion of Stafford and Port Street. In determining the proposed Character Precinct boundaries, the boundary was not extended past the corner of Majoribanks Street and Earls Terrace which formed a more logical western boundary.

64 I do not recommend any changes to the Character Precinct boundaries to include this area.

Hawker Street and Duke Street

65 The area is shown in Figure 5:

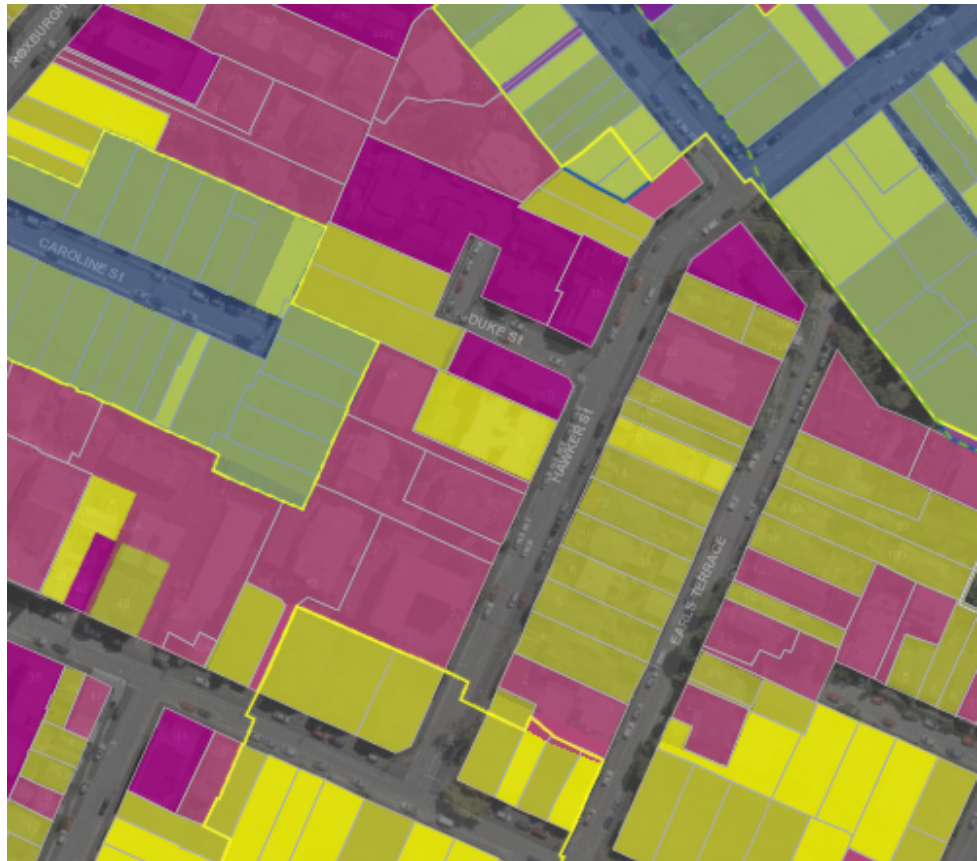


Figure 5. Hawker Street and Duke Street.

66 The area was excluded due to a lack of consistent character in this block, in particular the absence of a notable concentration of primary buildings. The western side of Hawker Street in particular has a majority of neutral and detractive properties.

67 I remain of the view that is area should not be included as a Character Precinct.

Claremont Grove

68 In applying the methodology, the presence of the detractive building (Hazelcourt Flats) at 4 Claremont Grove, has led to the exclusion of 1, 3 and 5 Claremont Grove. I note that the southern side of Claremont Grove was identified as an Indicative Sub-Area, but not included under the methodology that was applied.

69 Consistent with the methodology applied in determining the Character Precinct, I do not recommend a change to this area.



Figure 6. Claremont Grove.

Lipman and Levy Streets

70 The area is shown in Figure 7:



Figure 7. Lipman and Levy Streets.

- 71 The area was not identified as an Indicative Sub-Area in the Pre-1930 Character Area Review. While there is a section along Lipman Street of consistent character that is predominantly primary, it is a small area and only exists on the eastern side of the street due to the operative central area zoning on the western side.
- 72 The character of Levy Street is more mixed and in my opinion would not warrant inclusion due to this mixture based on the adopted methodology.

Moncrieff Street

- 73 The area is shown in Figure 8:



Figure 8. Moncrieff Street.

74 The eastern side of Moncrieff Street was identified as a Indicative Sub-Area in the Pre-1930 Character Area Review. In applying the adopted methodology, the area was excluded due to the two detractive properties located on the western side and the overall small size of the street. A more logical boundary pattern was achieved by continuing to the corner of Brougham and Elizabeth Streets.

75 I acknowledge that the area could be included but have not been persuaded that it should be included with reference to the adopted methodology and achieving logical boundaries, and therefore do not recommend a change in this area.

Pirie Street

76 The western end of Pirie Street has been excluded from a proposed Character Precinct as shown in Figure 9:



Figure 9. Western Pirie Street.

77 The proposed boundary excludes three contributory and one primary property on the southern side of Pirie Street (which were identified as a Indicative Sub-Area in the Pre-1930 Character Area Review), and one primary property on the northern side.

78 Given the mixture of assessed characteristics across both sides of Pirie Street, the small area involved, and the logical boundary of delineating the area along Brougham Street, the area was excluded in applying the adopted methodology. I do not consider that a change is warranted to include these properties.

Ellice Street

79 There are two areas suggested at Ellice Street:

- (a) At the western end; and
- (b) At the eastern end.

80 The western end of Ellice Street is shown in Figure 10:



Figure 10. Western Ellice Street.

- 81 While the northern side of Ellice Street in this location contains a strong mixture of primary and contributory properties (and was identified as an Indicative Sub-Area in the Pre-1930 Character Area Review), the southern side does not, and tipped the balance to not including this area, as did the detractive properties on the corner of Pirie and Brougham Street.
- 82 Having further considered this area, I do not recommend any change and remain of the view that the recommended area is appropriate with reference to the adopted methodology.
- 83 The eastern end of Ellice Street is shown in Figure 11:



Figure 11. Eastern Ellice Street.

84 The area was not identified as an Indicative Sub-Area in the Pre-1930 Character Area Review.

85 I consider that there is sufficient variability in the assessed character contribution of this area that the recommended boundaries remain appropriate. From the perspective of maintaining logical block boundaries, the northern side of Pirie Street could be extended. But, in doing so, this would necessitate including the southern side to maintain a 'both sides of the street approach' and the variability of character dissuades me from recommending this change.

Patterson Street

86 The area of Patterson Street is shown in Figure 12:

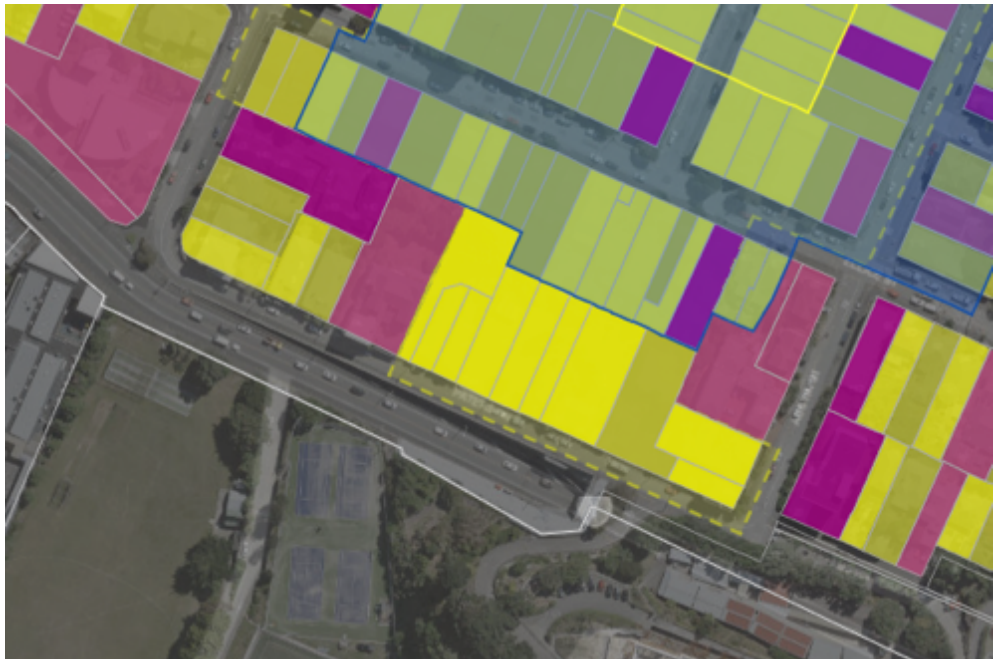


Figure 12. Patterson Street.

- 87 The Patterson Street area contains an area of concentrated primary character which was identified as an Indicative Sub-Area in the Pre-1930 Character Area Review.
- 88 It was not identified in the notified PDP, and I did not recommend its inclusion through the Section 42A report. The basis of that primarily turns on the surrounding environment on the southern side of Patterson Street, being State Highway 1. This clashes with the general, though not absolute approach, of mapping areas where there is character evident on both sides of the street.
- 89 Should the Panel be minded to include this area, I would recommend the entire block bounded by Patterson, Ellice, Brougham and Austin Streets be included to achieve logical block boundaries. However, I do not support the expansion of the recommended Character Precinct in this area.

115 Brougham Street

90 I address this site as I understand it arose as a topic during Hearing Stream 3 with questions to Mr McCutcheon.

91 I confirm that the site is not included as a Character Precinct in the notified PDP, but I have recommended that it be included as a Character Precinct as part of the expanded areas recommended in the Section 42A report.

Newtown

Emmett, Green and Wilson Streets

92 The area, as identified by a number of submitters, is shown in Figure 13:



Figure 13. Emmett, Green and Wilson Streets.

93 I acknowledge that the area, in terms of its character contribution, exhibits a strong concentration of primary and contributory character. I

also note that it was not identified as an Indicative Sub-Area through the Pre-1930 Character Area Review.

94 I have provided some commentary on this area in the Section 42A report at paragraphs 152 and 153. Of particular relevance I noted:

“Green Street and Wilson Street would be isolated from other areas of character and their inclusion would create a small ‘island’ of identified character. Both are also in close proximity to the Newtown commercial centre, lending themselves to accommodating a greater level of intensification.”

95 I remain of that view, though I would better describe the area as a ‘finger’ extending from a larger area of contiguous character to the east. In my view the area would be too disconnected from the larger concentration of character to the east. This is shown in the maps of the areas provided in Appendix 7.

Normanby, Donald McLean, Rhodes and Daniell Streets

96 The area is shown in Figure 14:

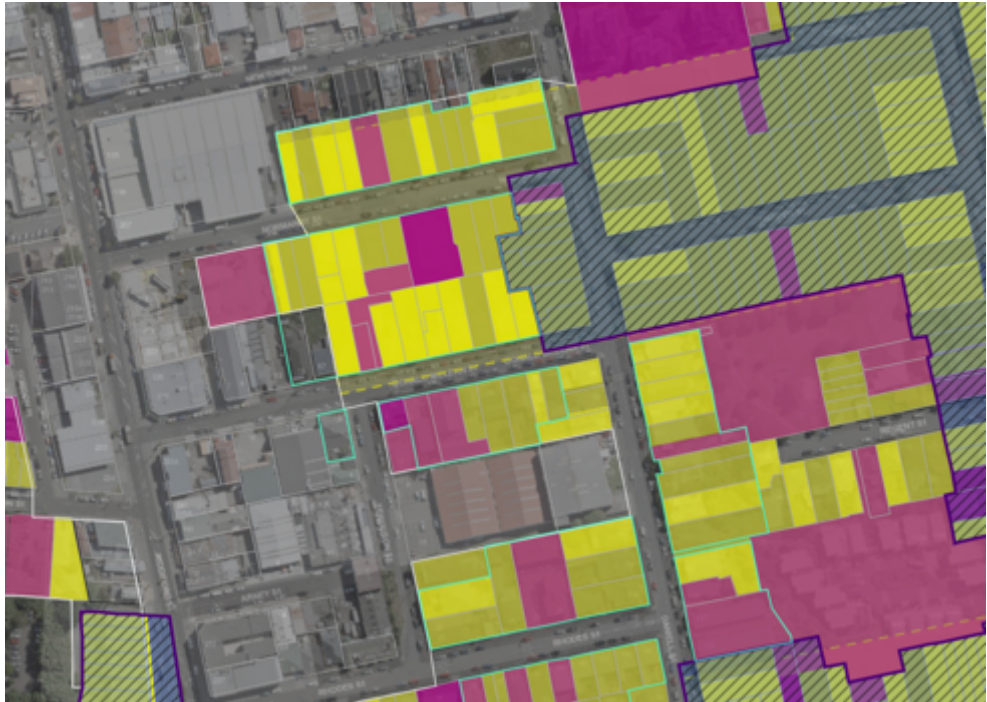


Figure 14. Normandy, Donald McLean, Rhodes and Daniell Streets

97 Similar to the approach to Emmett, Green and Wilson Streets, the suggested change in this instance would extend an area away from a larger concentration of identified character.

98 While Donald McLean street contains an area of primary character, there is a much larger variability outside of this area. Along Daniell Street, there is a non-residential building that provides a disruptive element both in terms of character, and the ability to form logical boundaries. I do not support the inclusion of this area.

Daniell Street (South)

99 Further south along Daniell Street, submitters have identified smaller pockets on both the eastern and western side of the street. The area is shown in Figure 15:

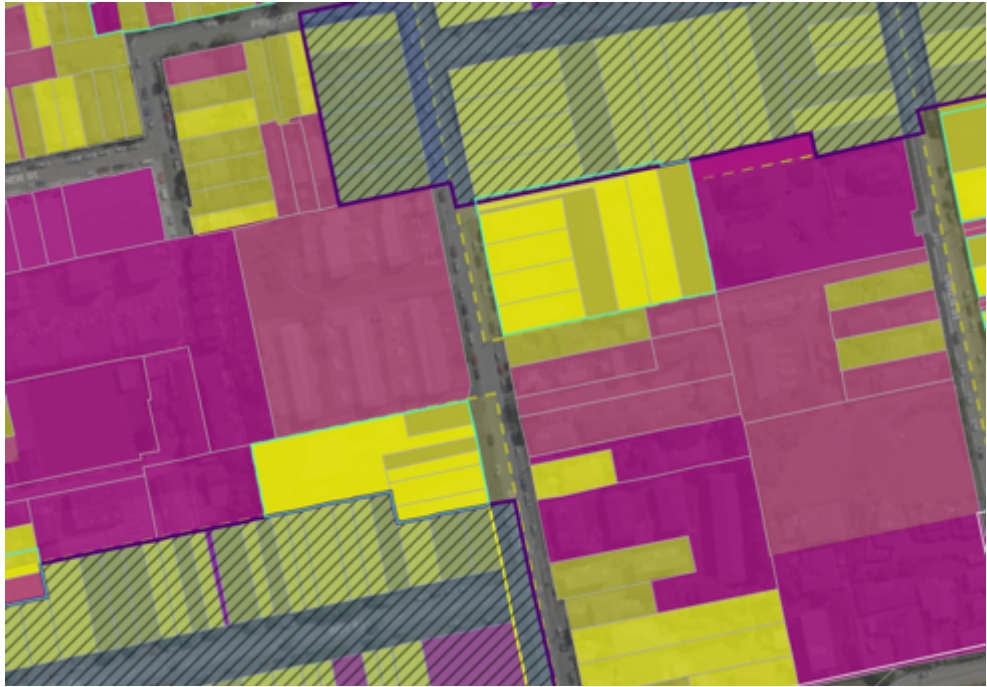


Figure 15. Daniell Street (South)

100 While there is a predominance of primary character in these areas, it is the surrounding development with a predominance of neutral and some detractive properties, that led to the exclusion of these areas. I remain of the view that they have been appropriately excluded with reference to the adopted methodology.

Owen Street (South)

101 The area is shown in Figure 16:



Figure 16. Owen Street (South)

102 The area exhibits a predominantly primary character on the eastern side of Owen Street in this area, but the neutral and detractive properties on the western side led to the exclusion of this area. I consider this to be appropriate and do not recommend any change in this area.

Owen Street (North)

103 The area is shown in Figure 17. This area of Owen Street contains a small number of properties, with Wellington Hospital being located on the western side of the street.

104 In this instance, the one-sides nature of residential development, and the formation of a logical boundary along Mein Street, determined the exclusion of this area which I consider to be an appropriate boundary.

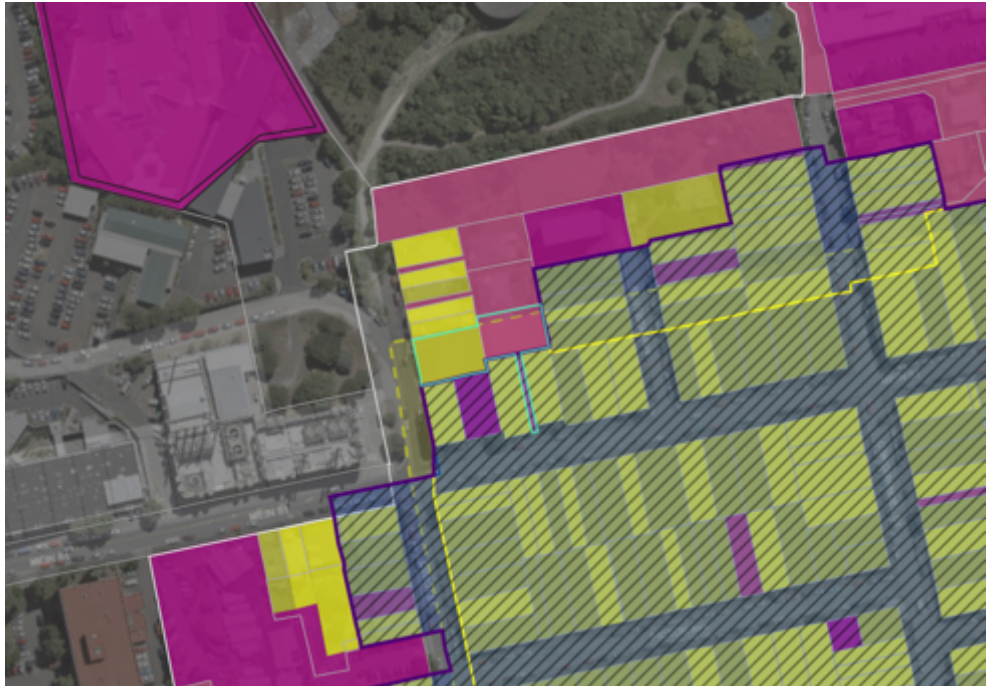


Figure 17. Owen Street (North).

Hanson Street

105 The area is shown in Figure 18:

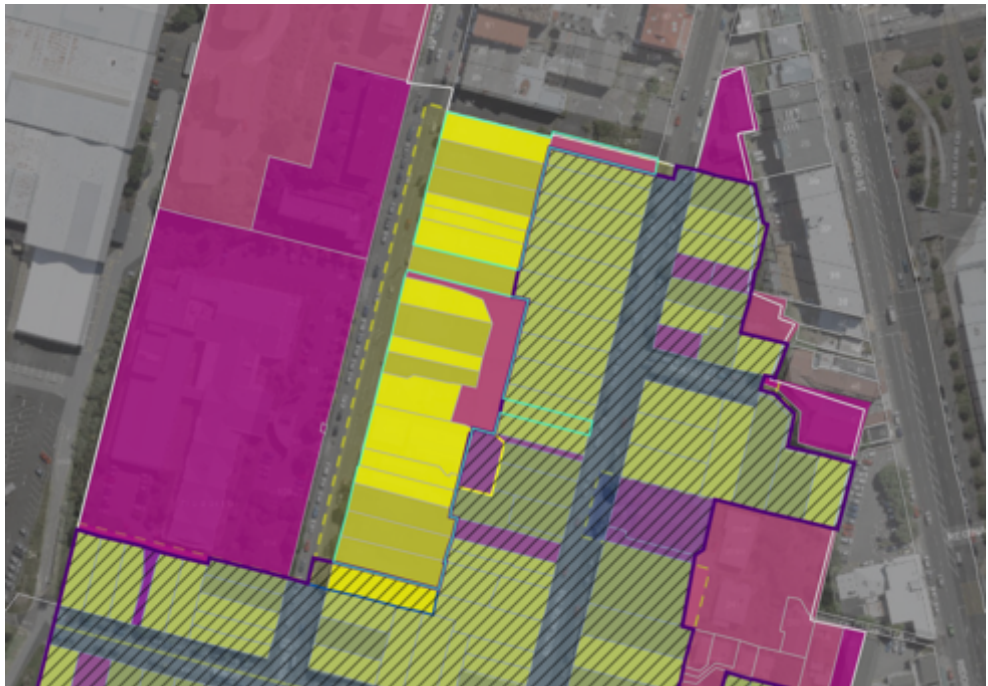


Figure 18. Hanson Street.

106 I acknowledge the strong consistency of character contribution in this area. Consistent with the adopted methodology however, the detractive element on the western side of Hanson Street (Southern Cross Hospital) has led to the exclusion of this area. I do not recommend a change to the extent of the proposed Character Precincts in this area.

Trevor Terrace, Mudges Terrace and Torquay Terrace

107 The area is shown in Figure 19:

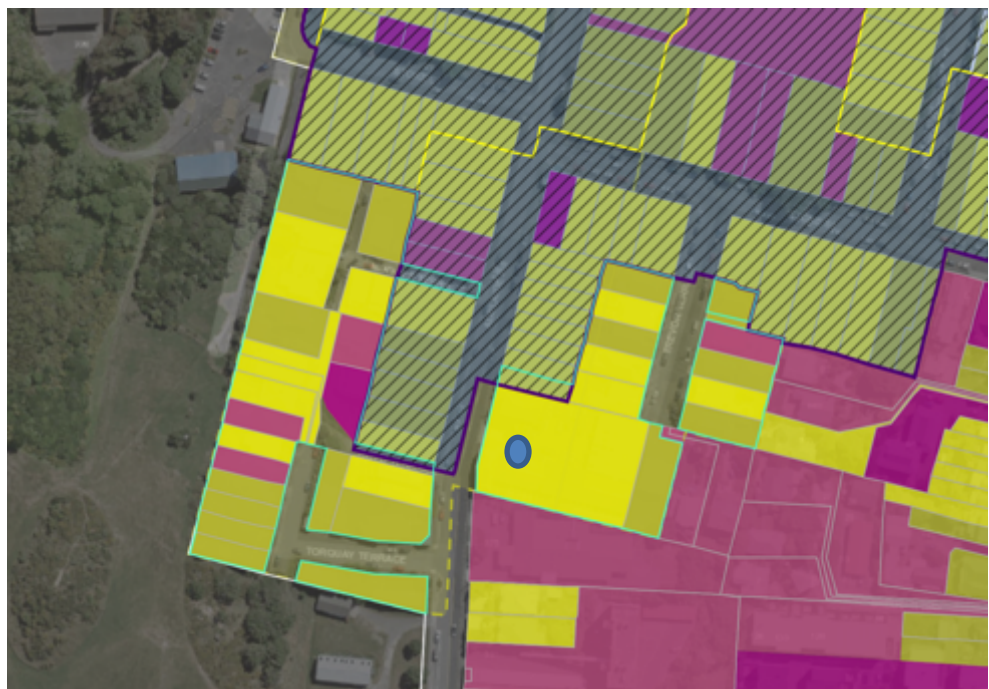


Figure 19. Trevor Terrace, Muges Terrace and Torquay Terrace (369 Adelaide Road is marked)

108 The area around Torquay Terrace and Muges Terrace contain a small number of properties with a mixed character contribution and was excluded on that basis.

109 The exclusion of the property at 369 Adelaide Road (marked) is caused by the presence of a large commercial/industrial building on the site fronting Adelaide Road, in addition to a pre-1930 dwelling on the same site.

110 And for Trevor Terrace, the small extent of the street and a mixed character contribution, led to its exclusion and the creation of a logical boundary along Stoke Street.

Mt Cook

111 Submitter suggestions for Mt Cook are shown in Appendix 8.

Finlay Terrace, Howard Street and Tasman Street

112 The area is shown in Figure 20:



Figure 20. Finlay Terrace, Howard Street and Tasman Street

113 The areas identified show a high variability of assessed character contribution and the areas proposed by submitters have already been assessed with reference to the adopted methodology. I do not propose any amendments in these areas.

Hargreaves, Rolleston, Wallace Street and Hankey Streets

114 The area is shown in Figure 21:



Figure 21. Hargreaves, Rolleston, Wallace and Hankey Streets.

115 In respect of Hankey Street, the suggested area is a small area of consistent character. However, the opposite side of Hankey Street is not a character area and therefore does not satisfy the preference for character existing on both sides of a street.

116 In respect of Rolleston and Hargreaves Streets, while there are certainly pockets of consistent character along both streets, including primary areas, there is sufficient variability in these areas that has led to their exclusion. This can be contrasted with the area in Bidwill Street where a Character Precinct is proposed.

117 I remain satisfied that the recommended areas are appropriate.

Douglas Street

118 The area is shown in Figure 22:



Figure 22. Douglas Street.

119 The area identified by submitters is a small area that is not mirrored on the opposite side of Douglas Street. Resultingly, it was not included and I do not recommend its inclusion.

Thorndon

120 Submitter suggestions for Thorndon are shown in Appendix 9.

Lewisville Terrace, Upper Lewisville Terrace and Barton Terrace

121 The area is shown in Figure 23:



Figure 23. Lewisville, Upper Lewisville and Barton Terraces

122 This small area contains a high variability of character contribution which led to it not being included as a Character Precinct.

Tinakori Road and Harriett Street

123 The area is shown in Figure 24. The small area suggested contains one neutral, one contributory and one primary property.

124 The small nature of the area, the mixture of assessed character contribution, and its location relative to other areas has led to its exclusion which I consider to be appropriate with reference to the adopted methodology.



Figure 24. Tinakori Road and Harriett Street.

Grant Road



Figure 25. Grant Road.

125 The assessed character contribution in the area suggested in Grant Road, does not satisfy the character contribution requirement for inclusion as a Character Precinct.

Selwyn Terrace

126 The area is shown in Figure 26:



Figure 26. Selwyn Terrace.

127 I acknowledge the number of assessed primary properties in this area.

128 Selwyn Terrace itself is a narrow and initially steep street that is largely contained with limited views into the area from immediately surrounding properties. When viewed from Hill Street, the two primary properties are framed between two detractive properties. A further detractive property frames the entrance to Selwyn Terrace. This limits its streetscape contribution. Further, it is separated from other areas creating an isolated pocket of residential development.

129 On this basis, I do not support its inclusion as a Character Precinct. I note that the proposed zoning of the area will be determined as part of Hearing Stream 4.

Portland Crescent

130 The area is shown in Figure 27:



Figure 28. Portland Crescent.

131 There is a small cluster of primary properties located near the head of the Portland Crescent cul-de-sac. Outside of this cluster, the assessed character contribution of this area is more variable.

132 Akin to Selwyn Terrace, the area is isolated from any other surrounding Character Precinct. Its overall small scale and the smaller cluster of primary properties leads me to the conclusion that the area should not be included as a Character Precinct. The proposed zoning of the area will be determined as part of Hearing Stream 4.

Hobson Street Block

133 The area is shown in Figure 29:



Figure 29. Hobson Street.

134 The spatial extent of the recommended Hobson Street Character Precinct is slightly larger than that of Portland Crescent and Selwyn Terrace, and exhibits a much more consistent assessed character contribution.

135 Outside of the identified area however, the assessed character contribution is much more variable and it is difficult to identify any logical expansion that identifies areas of consistent character. For this reason, I do not recommend any additions to the identified area.

Berhampore

136 Submitter suggestions for Berhampore are mapped in Appendix 10.

Te Wharepouri Street

137 The area is shown in Figure 30:

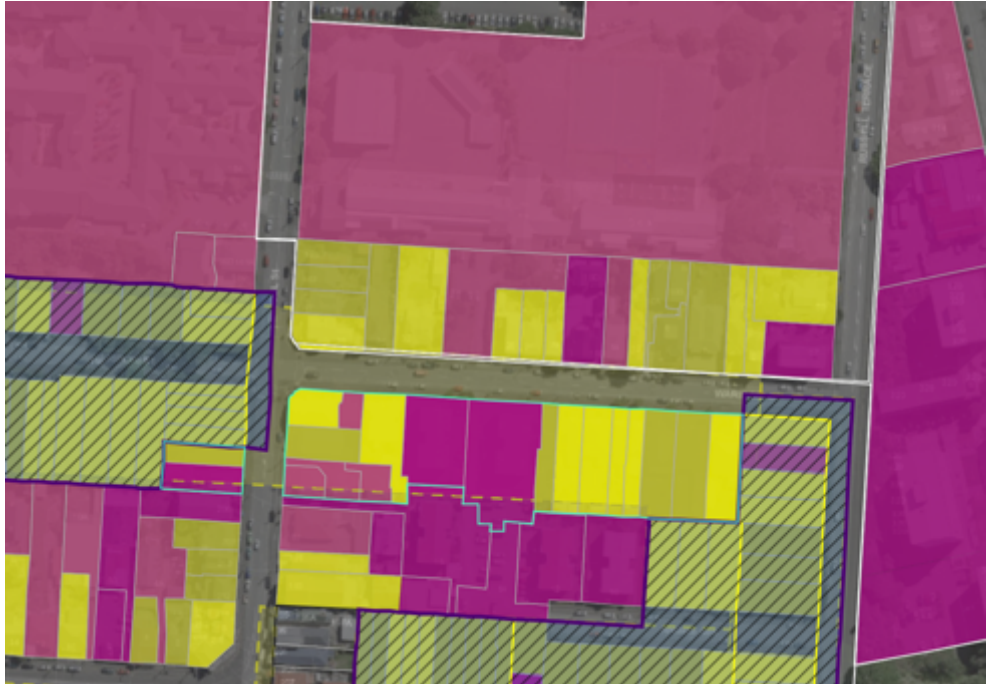


Figure 30. Te Wharepouri Street.

138 The block of Te Wharepouri Street between Rintoul Street and Russell Terrace contains a mixture of assessed character contribution such that there was an insufficient consistency of character to warrant its inclusion. This contrasts with the extent of Te Wharepouri Street between Rintoul Street and Adelaide Road which exhibits a much greater consistency of assessed character contribution.

Adelaide Road, Te Wharepouri Street and Palm Grove

139 The area is shown in Figure 31:



Figure 31. Adelaide Road, Te Wharepouri Street and Palm Grove.

140 The area has been excluded as a result of the mixed character contribution of this area, in particular the small number of primary properties. I consider the exclusion of the area to be appropriate and do not recommend any changes.

Luxford and Herald Streets

141 The area is shown in Figure 32.

142 The area was not included as a Character Precinct as a result of the mixed character contribution from properties in this area. I remain of the view that there is an insufficient consistency of assessed character in this area to warrant its inclusion as a Character Precinct.



Figure 32. Luxford and Herald Streets.

Adelaide Road (South)

143 The area is shown in Figure 33:



Figure 33. Adelaide Road (South).

144 For the area south of Lavaud Street, the presence of the large detracting site on the western side was considered to sufficient disrupt that block so as to not warrant its inclusion. I remain of the view that remains an appropriate recommendation.

145 Further north along the eastern side of Adelaide Road, while there is an area of generally consistent primary character, this was excluded as the orientation of houses on the western side of Adelaide Road was in part perpendicular to Adelaide Road (between Duppa and Chilka Streets), the topography dropped away to the west and affected the consistency of character in terms of it being evident on both sides of the street. Having considered this area again, I remain of the view that the boundaries proposed remain appropriate.

Rintoul Street and Lavaud Street

146 The area is shown in Figure 34.

147 The small areas identified in Rintoul Street are of mixed character, and where small pockets of consistent character exist, this is not mirrored on the opposite side of Rintoul Street. Resultingly, the areas have not been included and I remain satisfied of their exclusion.

148 Along Lavaud Street, opposite Martin Luckie Park, is a small concentration of primary and contributory properties. This is disrupted by an area of mixed character such that the Character Precinct boundary was not extended further west to create a larger area.

149 I acknowledge that from the perspective of creating logical block boundaries this area could be included. And while the presence of the park to the south overcomes concerns about a 'both sides of the street'

approach, the presence of the intervening cluster of mixed character properties dissuades me from recommending a change in this area.



Figure 34. Rintoul Street and Lavaud Street.

Aro Valley

150 Submitter suggestions for Aro Valley are shown in Appendix 11.

Levina Avenue, Mortimer Terrace and Durham Crescent

151 The area is shown in Figure 35.

152 In my review of this area, there is an insufficient consistency of assessed character, in particular primary buildings, to warrant its inclusion as a Character Precinct.



Figure 35. Levina Avenue, Mortimer Terrace and Durham Crescent

Holloway Road

153 The area is shown in Figure 36.

154 There is a high degree of variability in the assessed character contribution in this area. The area recommended as part of the Section 42A report has identified an area of the most concentrated character in this area. The variability outside of this area is in my view too great to justify inclusion as a Character Precinct.

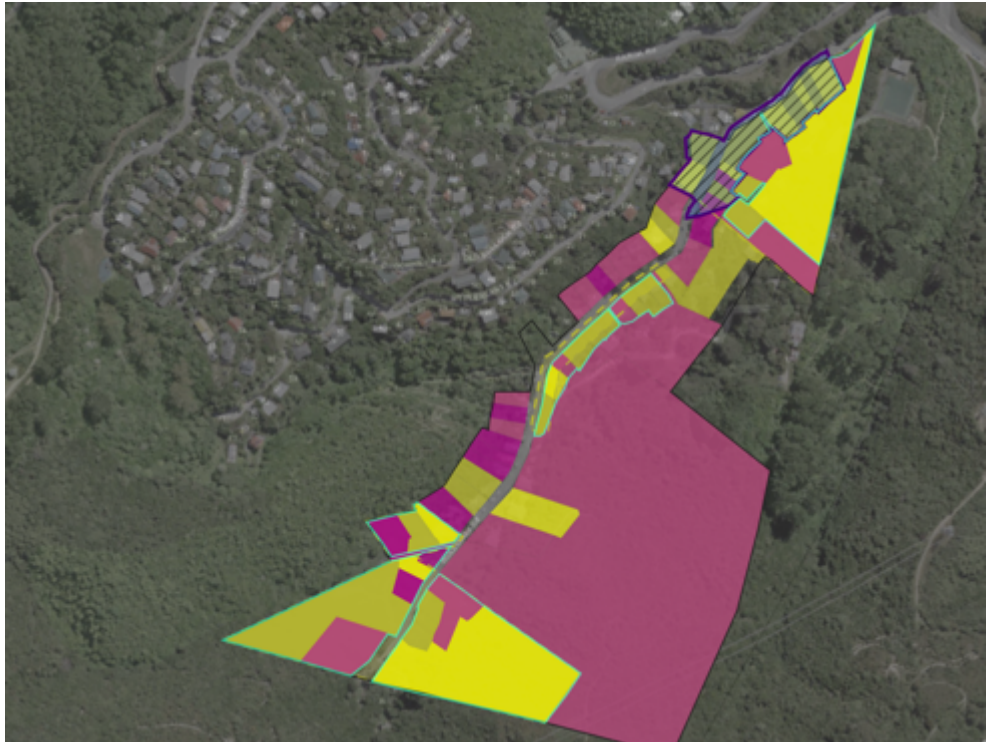


Figure 36. Holloway Road.

Durham Street, Aro Street, Adams Terrace and Devon Street

155 The area is shown in Figure 37:



Figure 37. Durham Street, Aro Street, Adams Terrace and Devon Street.

156 In again reviewing this wider area, I consider that Adams Terrace contains an area of assessed character that is sufficiently consistent that could warrant inclusion as a Character Precinct. However, it is disconnected from any other Character Precinct. To link it to a Character Precinct would require including areas have a more variable character contribution, and that dissuades me from recommending its addition.

157 I do not consider that any of the other areas identified achieve the consistency of primary and contributory character that warrant their inclusion.

Ohiro Road, Aro Street, St John Street, Abel Smith Street and Willis Street

158 The area is shown in Figure 38:

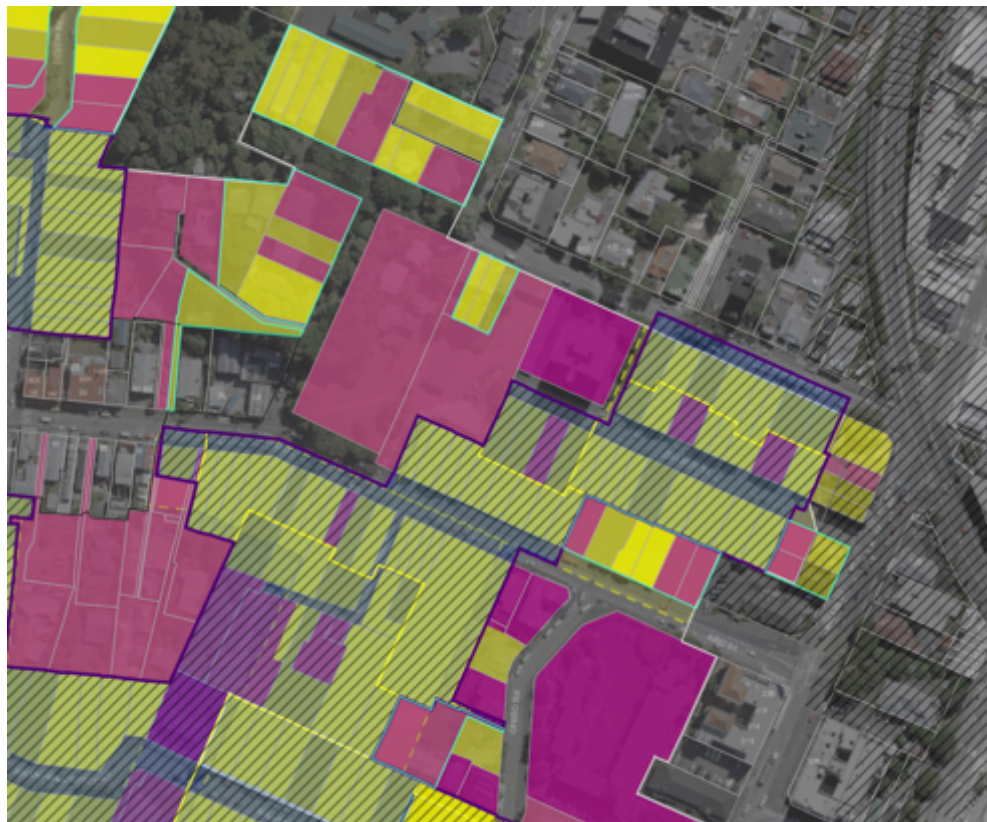


Figure 38. Ohiro Road, Aro Street, St John Street, Abel Smith Street and Willis Street.

159 The small size of these areas coupled with their mixed character contribution means that I remain comfortable with the boundaries proposed through the Section 42A report.

The Terrace

160 Submitters have sought either the retention of the existing ODP character area or specific properties within it as identified in Appendix 12 and Figure 39 below:

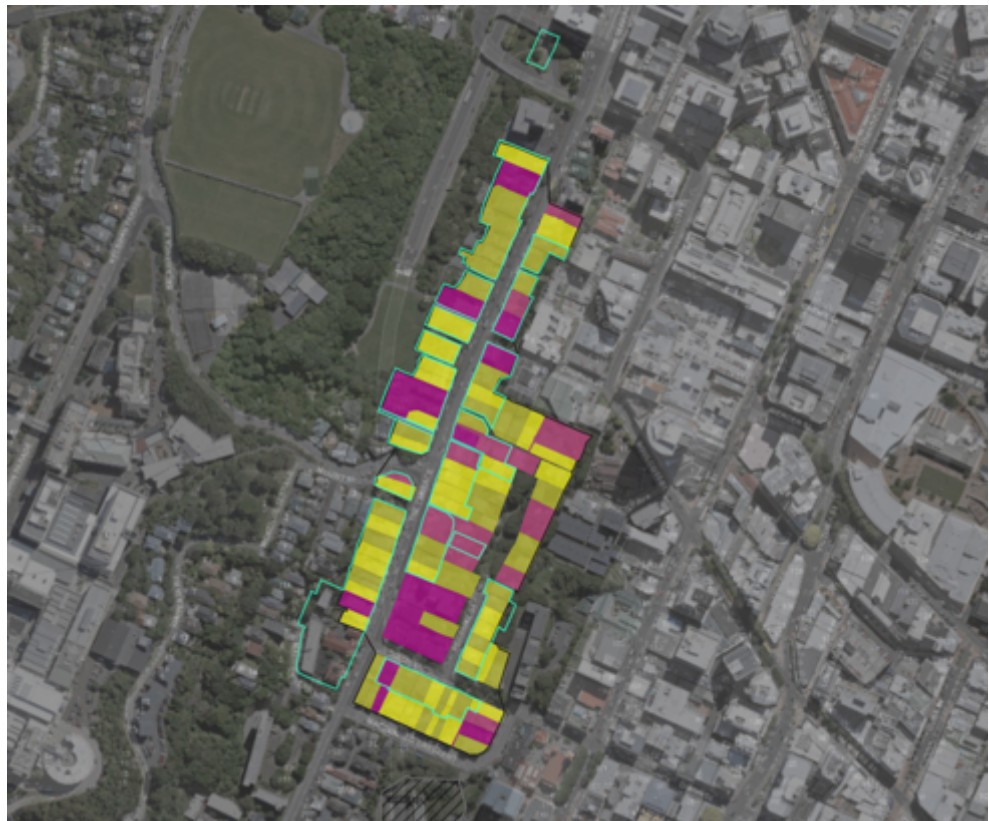


Figure 39. The Terrace.

161 The existing character area at The Terrace was not identified as an Indicative Sub-Area in the Pre-1930 Character Area Review and was not identified by the Council as an area for inclusion as a Character Precinct.

162 In reconsidering this area further for the purposes of the Section 42A report through the adopted methodology, it was concluded that the assessed character contribution of the area was too variable. While there are clusters of primary and contributory buildings, they are sufficiently interspersed with neutral and detractive properties to not create a logical Character Precinct when contrasted with other areas.

163 From this starting point, the positioning of the area on the edge of the central area led to the conclusion that the area should not be included as a Character Precinct and up-zoned in line with Policy 3 of the NPS-UD. Having reconsidered this area based on submitter suggestions, I remain of the view that the area should be excluded.

Lower Wadestown

164 The area referred to is shown in Figure 40, along with Appendix 13:

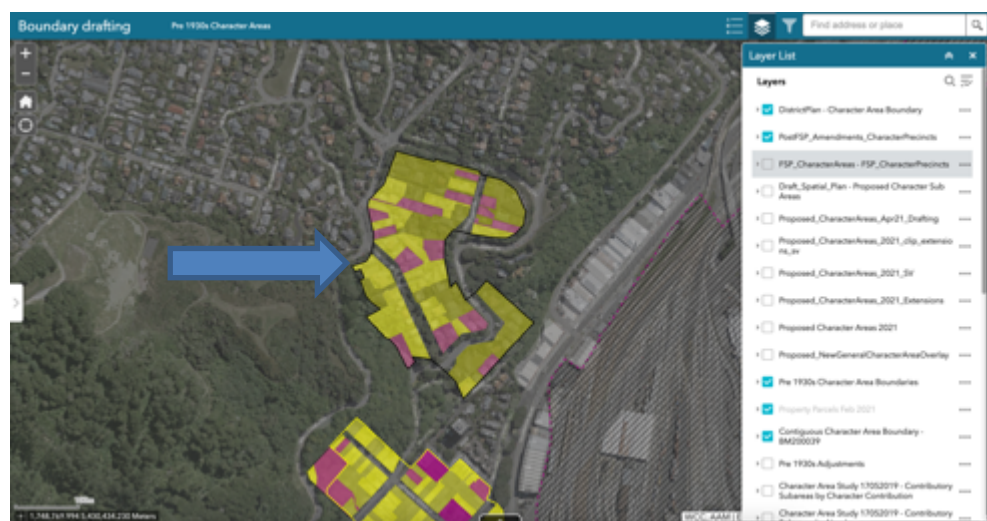


Figure 40. Lower Wadestown.

165 The area was identified as a 'contiguous area' as part of the Boffa Miskell Pre-1930 Character Area Review. That is, it was identified as an area that was not presently a character area under the ODP, but warranted further investigation.

- 166 The properties within it were subsequently assessed for their individual character contribution as reflected in Figure 40 and in Appendix 13.
- 167 In terms of the classification of the properties, the area exhibits a reasonably high concentration of primary character contribution along Orchard Street. Outside of Orchard Street, there is a far greater mix with a predominance of contributory buildings. Therefore, if an additional Character Precinct were to be created, it would need to be concentrated along Orchard Street. In that event, the result would be a small island created as a Character Precinct that is largely disconnected from other nearby areas.
- 168 Given the above, the need to give effect to Policy 3 and the MDRS, and that the area is not presently identified as a character area, I do not support its inclusion as a Character Precinct.

Listed heritage buildings and the identification of Character Precincts

- 169 The presence of listed heritage buildings, or heritage areas (or any proposed for listing), was not a factor in determining the boundaries of proposed Character Precincts.

4 Vogel Street

- 170 4 Vogel Street is shown in Figure 41 below and in Appendix 14. Under the ODP, the site is within a pre-1930 character area, but is outside of the existing Mt Victoria North character area.
- 171 In the PDP, the site is neither proposed as a Character Precinct, or as part of the MVNT Precinct. The neighbouring site at 11 Vogel Street forms the south-eastern corner of the MVNT Precinct.

172 The site directly adjoins the Mt Victoria North Townscape Precinct and is an elevated site, having a high degree of prominence adjacent to the MVNT Precinct when viewed from certain locations.

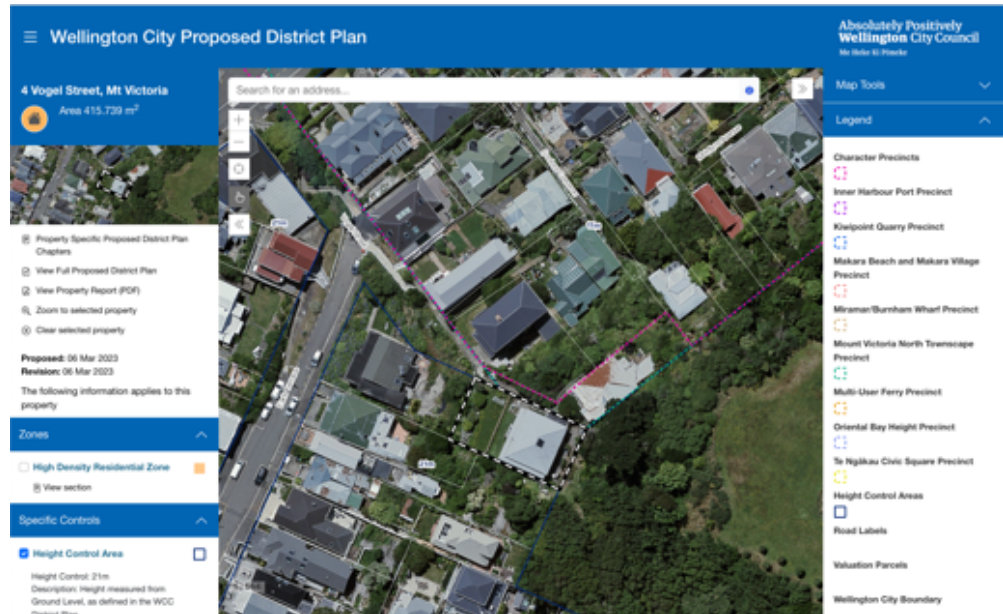


Figure 41. 4 Vogel Street.

173 The site was not specifically identified by the Mt Victoria North Townscape Precinct Urban Design Review as a potential inclusion in the MVNT Precinct, though that review did highlight the need to consider the height allowances for neighbouring properties.

174 I agree that the site is a prominent site, and is the next highest point adjacent to the MVNT Precinct in this location. In that respect, it could be included within the MVNT Precinct. However, its inclusion would pose the question of 'edge effects' i.e. whether the next site at 20 Earls Terrace (of a lower elevation but still elevated) should also be included, and in turn the next site and so on. Such an approach would lead to a further expansion of the MVNT Precinct and would need justification as a qualifying matter.

175 On balance I do not support including the site in the MVNT Precinct. The site has not historically formed part of the existing Mt Victoria North

character area and was not specifically recommended for inclusion as part of a review of the proposed precinct boundaries. Future re-development of the site could result in a higher, and consequently more prominent building – something that is clearly envisaged by the direction of the NPS-UD.

11-15 Brougham Street

176 This matter arose from a submission from Vik Holdings Ltd. The properties at 11-15 Brougham Street are shown in Figure 42:



Figure 42. 11-15 Brougham Street.

177 The assessed character contribution of the properties is shown in Figure 43:



Figure 43. 11-15 Brougham Street (15 Brougham Street is marked)

178 In terms of their assessed character contribution, 11 Brougham Street is assessed as primary, and 13-15 Brougham Street are assessed as contributory.

179 I agree that the proposed Character Precinct boundary in this location could be better defined. The Character Precinct, as mapped, was the area agreed to by the Council for notification. While I made recommendations for additions though the section 42A report, I did not seek to remove areas that the Council had agreed to.

180 Having considered this area again, in my view there are two potential options:

- (a) to remove 15 Brougham Street (and the adjoining neutral property at 17 Brougham Street); or
- (b) to expand the Character Precinct to the northwest to take in the balance of the block to the corner of Brougham Street and Majoribanks Street.

- 181 The two options are shown mapped in Appendix 15.
- 182 The first option would remove 15 Brougham Street as a contributory building, and 17 Brougham Street as a neutral building. To the south, the boundary of the Character Precinct would be Pat Lawlor Close. This boundary is logical in terms of identifying a group of primary and contributory buildings.
- 183 This option would however create something of a ‘horseshoe’ around the area at 11-15 Brougham Street and 5-9 Brougham Street. In terms of the desire to achieve, wherever possible, logical Character Precinct boundaries, this option would not be consistent with that aim.
- 184 The second option would be to expand the Character Precinct boundary to include 11 and 13 Brougham, 5-9 Brougham, and 44 and 48 Majoribanks Street.
- 185 This option would have the benefit of creating a logical Character Precinct boundary, but would include two properties that are assessed as being neutral and detractive contributors. The presence of the neutral and detractive property is not necessarily determinative of whether the Character Precinct should be expanded or not. Both sites contain post-1930 buildings and therefore a demolition restriction would not apply.
- 186 This option would also be including properties that were not originally identified for inclusion within a Character Precinct. However, there is scope within the submissions to include the properties primary and contributory properties. It would however run counter to the relief sought by VIK Holdings.
- 187 Again on balance, I favour the expansion of the Character Precinct to include the remainder of the block. Should that option not be preferred, I agree that the inclusion of 15 Brougham Street as presently mapped creates an inconsistency in the mapping of the Character Precincts.

Should the Panel prefer, I would support the removal of 15 Brougham Street, but would expand this to remove the property at 17 Brougham Street.

**CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING –
WELLINGTONS CHARACTER CHARITABLE TRUST**

188 The presentation from Wellington’s Character Charitable Trust identified four ‘limbs’ in the relief sought:

- (a) Retention of the Character Precincts as amended in the Section 42A report;
- (b) Adding all primary and contributory buildings;
- (c) Changing the demolition policy in line with the suggestion made by Mr McKay; and
- (d) Reverting to the operative demolition rule and extent of the operative character areas.

189 In respect of (a), I remain of the view that the Character Precincts as recommended through the Section 42A report remain appropriate.

190 As discussed above at paragraphs 42-45, I do not support the inclusion of all primary and contributory properties for the reasons I have specified. Similarly in respect of (d), I do not consider that retention of the operative character areas is appropriate or justifiable when considered through the lens of the MDRS and NPS-UD requirements.

191 In respect of (c), I have considered the amendments suggested by Mr McKay to Policy MRZ-PREC01-P2. There are two strands to the policy that provide for demolition with reference to either its character contribution, or its condition.

192 In respect of character contribution, Mr McKay seeks to add the following additional matter:

“Whether the building is a distinctive element within the local townscape.”

193 I consider that the matter is largely already addressed. Matter (a) already provides for:

“The level of visibility of the existing building from surrounding public spaces”

194 The additional matter is also framed in townscape terms, which brings in an additional element that is currently absent from the Character Precinct provisions which are framed at a streetscape level (aside from the Mt Victoria North Townscape Precinct). I do not consider that the additional matter is warranted.

195 In respect of building condition, Mr McKay makes the following suggested amendments:

2. Retention of the existing building is impractical or unreasonable

~~The building is shown to be in poor condition, particularly in terms of:~~

*~~(a) Its structural integrity, so that its retention **would render it incapable of reasonable use** is impractical or economically unviable;~~*

~~(b) Whether the building presents a hazard; and~~

~~(c) Whether the building presents a risk to life in the event of an earthquake.~~

196 I do not consider that the change proposed to the chapeau to be material. Mr McKay has shifted part of the existing matter (a) in terms of ‘impracticality’ into the heading and added ‘unreasonable’ in place of economically unviable. However I consider that the introduction of ‘incapable of reasonable use’ as a term used in section 85 of the Act brings with it a particular statutory meaning that is not appropriate in

this policy. I consider reference to economic viability to be more readily addressed in terms of quantification and assessment than the more subjective use of unreasonable.

197 Resultingly, I am satisfied with the wording of the policy and do not support Mr McKay's suggested amendments.

198 In respect of demolition by neglect, I do not consider that the policy will encourage this approach. Demolition by neglect can occur under the operative policy – a matter acknowledged submitters at the hearing.

199 I also note that a number of submitters expressed a contrary view to Mr McKay – that the proposed demolition rule and supporting policy is overly restrictive.

200 In reviewing this issue, I noted that in terms of the way that demolition is defined, relocation of a building from a site is not explicitly addressed (though removal is mentioned) such that demolition of any building within a Character Precinct could arguably be achieved through its relocation from the site. I note that this definition is fundamentally similar to that of the ODP, suggesting that use of removal addresses relocation.

201 Should the Panel not be satisfied that 'removal' sufficiently addresses relocation, I have suggested an amendment below. This matter is not specifically linked to a submission point so will need to be considered as an out of scope recommendation if the Panel were to adopt it. I also propose the addition of the word 'such' to correct an error.

Demolition *for the purposes of Character Precincts*

means the removal, relocation, destruction or taking down of the primary form of any building, or additions and alterations (including partial

demolition) that are so substantial that the primary form of the building is rendered illegible; or the removal, destruction, or taking down of architectural features or elements on the primary elevation(s) of any building. It does not include any work that is permitted such as repair or maintenance.

**CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING –
WELLINGTON HERITAGE PROFESSIONALS**

- 202 The submitter (along with other submitters) commented on ‘grey’ areas in the Pre-1930 Character Area mapping, questioning whether the assessment was complete.
- 203 Having reviewed the material again, I believe that the reference is made in respect of the identified ‘Indicative Sub-Areas’ in the Pre-1930 Character Area Review.
- 204 Figure 44 shows an extract from this mapping for Aro Valley.



Figure 44. Indicative Character Contribution Sub-Areas – Aro Valley.

205 The mapping shows areas where the report identified areas of predominantly primary and contributory character, and areas of predominantly neutral and detractive character. Areas that were left 'grey' are areas where the report did not identify a concentration of either sort. The areas were nevertheless assessed for their individual character contribution as was shown above at Figures 37 and 38 for example.

CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING – WAKA KOTAHI

206 The fundamental issues raised by Waka Kotahi related to the appropriateness of the proposed qualifying matters. I consider these issues to be addressed through the response in Appendix 1.

207 During the hearing Mr Scott raised a matter relating to infrastructure and how the construction of infrastructure navigates issues of overlap with Character Precincts. He cited a more nuanced approach within the heritage chapter.

208 I have considered this point and agree that an amendment should be considered. The ability to consider demolition on any basis other than building condition and character contribution is absent from the existing policy. The amendment being proposed would add a third element relating to infrastructure. There is no specific submission point on this matter, so the amendment will need to be considered as an out of scope recommendation.

209 The amendment proposed is to Policy MRZ-PREC01-P2, and I suggest the following wording:

MRZ-PREC01-P2 Restrictions on demolition

Only allow the demolition of pre-1930 buildings, including the demolition or removal of architectural features from the primary elevation of any pre-1930 building, where either:

1. It can be demonstrated that the contribution of the building to the character of the area is low, with reference to:
 - a. The level of visibility of the existing building from surrounding public spaces;
 - b. Whether the building is consistent in form and style with other pre-1930 buildings that contribute positively to the character of the area;

- c. The extent to which the existing building retains its original design features relating to form, materials, and detailing and the extent to which those features have been modified;
 - d. Whether the building is an integral part of a row of buildings that are consistent in form, scale and siting; and
 - e. Whether the building represents a rare or unique example of pre-1930 architecture; or
2. The building is shown to be in poor condition, particularly in terms of:
- a. Its structural integrity, so that its retention is impractical or economically unviable;
 - b. Whether the building presents a hazard; and
 - c. Whether the building presents a risk to life in the event of an earthquake; or
3. Demolition of the building is required for the construction of infrastructure, taking into account the functional need and operational need of the infrastructure.

**CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING – KĀINGA
ORA**

- 210 The principal issue resulting from the Kāinga Ora submission relates to sections 77J and 77L. This matter has been responded to through Appendix 1.

211 I note that discussion regarding the potential for the MVNT Precinct to be provided for as a heritage area has been discussed in Hearing Stream 3. Resultingly, I have not commented on this matter.

CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING – PETER HILL

212 Mr Hill addressed the creation of logical zoning boundaries that take into account block boundaries and are otherwise minimise the application of multiple zones within blocks.

213 I have addressed this matter through the recommended amendments to Character Precinct boundaries made through the Section 42A report, in line with the adopted methodology for mapping Character Precincts.

214 It is not always possible however to determine Character Precinct boundaries with reference to street blocks in needing to balance the requirements of the MDRS and Policy 3 of the NPS-UD, and justifying areas as a qualifying matter. In my view, the areas recommended through the Section 42A report improve the application of Character Precinct boundaries as compared to the notified PDP.

CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING – LIVE WELLINGTON

215 Mr Foster, on behalf of LIVE Wellington, provided evidence regarding the ability to implement Character Precincts through section 77K, on the basis that the existing character areas addressed a matter of national importance under section 6(f) of the Act, which relates to the protection of historic heritage.

216 While the use of Section 77K would provide some convenience, I do not consider it a viable path. Character Precincts are not heritage areas, have not been proposed or assessed as such, and as MRZ-PREC01 makes clear:

“The Character Precincts do not seek to protect historic heritage values. While some areas may also be identified as heritage areas in the District Plan, the majority of the Character Precincts seek to identify existing concentrations of consistent character and prevent its further erosion.”

217 Use of section 77K turns on the matter being a qualifying matter specified in section 77(l)(a)-(i). The Character Precincts and the MVNT Precinct were proposed on the basis of Section 77l(j) being the applicable section.

218 Areas proposed by LIVE Wellington for inclusion as Character Precincts have been addressed in earlier sections.

**CLARIFICATION ON POINTS RAISED DURING THE STREAM 2 HEARING –
PENELOPE BORLAND**

219 Ms Borland raised a number of matters relating to potential areas to be included as Character Precincts which I have addressed above.

220 Ms Borland also mentioned that the specific relief sought in her submission regarding Earls Terrace was not addressed in the Section 42A report.

221 A large number of submitters made a large number of site and location specific requests through submissions. Rather than addressing each submission and area individually, the Section 42A report took a more thematic approach to responding to these submissions, having considered each submission individually.

222 This was undertaken at sections 10 and 11 of the Section 42A report. In respect of Ms Borland specifically, reference to her and the relief sought by her was recorded in the footnote at paragraph 73, and then again specifically at paragraph 131.

Date: 29 May 2023

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke at the end.

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APPENDIX 1 – SECTIONS 77J and 77L TABLE





Section 77J and 77L Assessment Analysis

Prepared by:

Victoria Woodbridge on behalf of Kāinga Ora – Homes and Communities

Mitch Lewandowski on behalf of Wellington City Council

Legend	
	Incomplete or missing assessment
	Complete Assessment

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
Assessment of Section 77J						
77J(3) The evaluation report must, in relation to the proposed amendment to accommodate a qualifying matter -						
77J(3)(a) demonstrate why the territorial authority considers— (i) that the area is subject to a qualifying matter; and	The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct does explain why the Council considers the Character Precincts are subject to a qualifying matter.		As clause (3)(a) does not give an indication of the depth of level of consideration technically Council has met this test because it has considered why the area is subject to a qualifying matter. However, the fundamental matter of whether it is appropriate to apply the qualifying matter has not been sufficiently addressed.	Paragraphs 40-47 of the Supplementary Evidence are a bland account of the legislation and assessments already undertaken through the Section 32 Evaluation Report. Section 8 of the Section 42A report undertakes a similar assessment with reference to specific submissions which are addressed in more detail. The general tenor is that Council considers the areas subject to a qualifying matter in order to maintain the existing concentrations of consistent and coherent character.	1. No comment necessary.	
(ii) that the qualifying matter is incompatible with the level of development permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 for that area; and	The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct makes limited commentary on the erosion of character as a consideration for applying character as a qualifying matter.		The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct does not provide sufficient assessment and consideration to demonstrate that the qualifying matter is incompatible with the level of development permitted by the MDRS within all areas of the Character Precincts – there is an underlying principle approach which does not consider specifics despite the differing characteristics and values of each area. It is noted that a permitted activity status required by Schedule 3A would not provide for the management of character without a resource consent, but of particular relevance is there is an assessment required as to why the qualifying matter is incompatible with the	Sections 9.1 and 9.2, Section 11 of the Section 32 Evaluation Report demonstrate the process Council undertook to determine a 'streetscape' approach to determining the extent of the character precincts. The conclusions also provide some explanation as to why Council considers character incompatible with the MDRS or requirements of Policy 3 – because the level of intensification would erode character values. Paragraphs 44, 54 of the Section 42A Evaluation make the same assessment but with reference to the Kāinga Ora submission and a loop back to the	This matter requires consideration of why the qualifying matter is incompatible with the level of development permitted by the MDRS or provided for by Policy 3. Kāinga Ora's response to the Council's Table Outlining Compliance accepts that there is an explanation as to why – because "the level of intensification would erode the character values". That is because, as the evidence cited in that table shows, the MDRS or at least six storey developments would erode the consistency and coherence of character of the houses and streetscapes that underpin the proposed character areas. In respect of the Mt Victoria North Townscape Precinct, while there is no restriction on demolition, the PDP concerns itself with managing the effects of new development on the iconic landscape setting of the precinct and its townscape values. In order to do so, it is inappropriate to permit the level of development envisaged by the MDRS without first considering townscape impacts.	

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
			intensification requirements of Policy 3. Noting that the NPS-UD only requires 6 storeys to plan-enabled, which includes up to a Restricted Discretionary activity status.	assessment within the Section 32 Evaluation. Paragraphs 18, 40-47 of the Supplementary evidence further reiterate the above and provide the legislative context (sections 77J and 77L). No new information has been provided to demonstrate exactly why, in detail, intensive development is incompatible with maintaining character within all character areas.		
77J(3)(b) <i>assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity;</i>	The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct references development capacity but this was not supported by any expert evidence or assessment as the report notes that information was unavailable at that time.		The Wellington City Qualifying Matters Assessment – November 2022 – Property Economics report was published after the Section 32 Evaluation and therefore the Section 32 Evaluation Report could not have fully taken into account the findings of this assessment. The Section 32 Evaluation Report Part 1: Context to s32 evaluation and evaluation of Strategic Objectives does consider capacity but I could find no reference to consideration of the impact of limiting development capacity through applying character as a qualifying matter. Council's section 42A report for Character Precincts does reference the Property Economics' report.	Both paragraphs 41 and 53 of the Section 42A report and paragraph 46 of the Supplementary Evidence refer back to the Property Economics assessment and apply that assessment to reach a conclusion that character as a qualifying matter will still ensure that sufficient development capacity to meet demand will be provided and that character as a qualifying matter reduce overall capacity by 1.9%.	This matter has been addressed by the Property Economics assessment provided with the Section 32 evaluation. A supplementary assessment prepared by Property Economics has addressed the additional areas recommended for inclusion as part of the Section 42A report.	
77J(3)(c) <i>assess the costs and broader impacts of imposing those limits.</i>	The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct undertakes a cost benefit analysis		It's not entirely clear what 'broader impacts' might be and I note the Section 32 Evaluation Report does not quantify the effects either maintaining or losing character values due to the subjective nature of these effects. Furthermore, there are some economic costs / benefits which are not quantified. However, the Section 32 Evaluation does undertake a cost benefit assessment but in my opinion that assessment is too narrow. As noted above, no consideration has been given to the cost of limiting bulk and location standards to maintain character i.e. if 11m is inappropriate to maintain character.	I agree that Section 11 of the Section 32 Evaluation Report and the Property Economics report do provide an assessment of the costs of imposing the qualifying matter limits, however, as noted in my comment to the left and above the assessment does not go far enough. The Supplementary Evidence loops back to the Section 32 Evaluation and doesn't provide any new information.	The Section 32 evaluation has undertaken an assessment of the costs and broader impacts of imposing the proposed limits. I agree that due to the subjective nature of some of these impacts (including benefits relating to character and townscape value protection) the costs (and benefits) have not been quantified. The development capacity impacts have been quantified. Inherent in the development capacity impacts are impacts on various housing typologies – and the data has been presented based on housing typologies. These broader costs have however been acknowledged. The PDP response both through the notified version, and as recommended in the Section 42A report, has sought to reduce the current extent of the Character Precincts (ie, in the ODP) as an acknowledgment of the requirements of the MDRS and Policy 3 of the NPS-UD and	

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
					the benefits resulting from increased heights and density and because of the need to modify building heights and density to the least extent necessary to accommodate the qualifying matter.	
77J(4) The evaluation report must include, in relation to the provisions implementing the MDRS,—						
77J(4)(a) <i>a description of how the provisions of the district plan allow the same or a greater level of development than the MDRS:</i>	The Section 32 Evaluation Reports for the Residential Zone and Character Precincts describe how the PDP provides for the same or a greater level of development than the MDRS.		I consider the test met because The Section 32 Evaluation Reports for the Residential Zone and Character Precincts do describe how the PDP provides for the same or a greater level of development than the MDRS.	I agree that the references provided on Council's roadmap refer to the descriptions of how the PDP allows the same or a greater level of development than the MDRS.	I agree with Kāinga Ora's assessment. The response of the PDP in respect of both the Character Precincts and the Mt Victoria North Townscape Precinct is to align with the bulk and location standards of the MDRS. The departure from the provisions of the MDRS is in requiring a resource consent for new development in both precincts, and for demolition in Character Precincts.	
77J(4)(b) <i>a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters and, in particular, how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—</i>	The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct describes modifications to the MDRS but it is unclear whether those modifications are limited to only those necessary to accommodate character as a qualifying matter.		As a fundamental point the application of character as a qualifying matter remains unproven (as noted in my primary evidence in chief and assessment of Section 77L below) and until a decision is reached as to whether character should be a qualifying matter consideration of this clause is something of a moot point. However, the Council have described how the MDRS is modified – due to the requirement for resource consent for demolition and construction of new buildings. The report identifies the purpose of this is to manage character by controlling the design of new buildings, this effectively means that to successfully maintain and enhance character (MRZ-PREC01-O1) height may need to be reduced from the MDRS level as this would be inconsistent with the qualities and cohesiveness of the streetscape (MRZ-PREC01-P1).	Council references paragraph 25 of their Supplementary Evidence where Mr Lewandowski notes that the Precinct provisions do not seek to “maintain the existing amenity”, however, MRZ-PREC01-O1 specifically seeks to manage character precincts so as to provide for their ongoing use and development that maintains and enhances character. I would consider character a component of amenity. Whilst Mr Lewandowski considers that the purpose of the provisions is to ensure new development is responsive to the character values the use of ‘maintain and enhance’ tell a different story. I agree that the Character Precinct areas are reduced from the ODP but this does not mean the modifications to the MDRS are limited to <u>only</u> those necessary to accommodate the qualifying matter – the qualifying matter itself remains unproven in my opinion.	The modifications proposed for Character Precincts include a control requiring new development to progress through a resource consent process to consider effects on character and a complementary control restricting demolition. For the Mt Victoria North Townscape Precinct, a control is proposed requiring new development to progress through a resource consent process to consider effects on townscape values. While not permitting the level of development provided for by the MDRS, the PDP nevertheless aligns with those standards for both the Character Precincts and Mt Victoria North Townscape Precinct, subject to consent requirements. The alignment with the MDRS standards provides a greater level of bulk and location standards from those in the ODP, and a consistent approach across all of the precincts, rather than the variable standards provided for in the ODP.	
77J(4)(b)(i) <i>any operative district plan spatial layers; and</i>	N/A - a full plan review is proposed	N/A			N/A	N/A
77J(4)(b)(ii) <i>any new spatial layers proposed for the district plan.</i>	Reference is made to the new Character Precinct spatial layer.				No comment necessary	

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
77J(5) The requirements set out in subsection (3)(a) apply only in the area for which the territorial authority is proposing to make an allowance for a qualifying matter.						
77J(6) <i>The evaluation report may for the purposes of subsection (4) describe any modifications to the requirements of section 32 necessary to achieve the development objectives of the MDRS.</i>	It does not appear any modifications were made to the requirements of Section 32.	N/A	As this clause is a 'may' clause Council has discretion as to whether it is relevant.	Council cites Section 11 of the Section 32 Evaluation Report, however this appears to follow the requirements of Section 32 and does not modify those requirements to achieve the development objectives of the MDRS.	N/A	N/A
Assessment of Section 77L						
77L(a) <i>identifies the specific characteristic that makes the level of development provided by the MDRS (as specified in Schedule 3A or as provided for by policy 3) inappropriate in the area</i>	The Boffa Miskell Assessment identifies the specific characteristics of each of the Character Precinct areas.		An urban design assessment to consider the specific effects of MDRS or Policy 3 enabled provisions should have been provided to assess the actual and potential effects of allowing higher density development in these areas and to test whether the Council provisions are appropriate to achieve the relevant outcomes with a lens on Policy 3 and 6 of the NPS-UD.	I agree that the paragraphs identified by Council do <u>identify</u> the specific characteristics of the character precincts. However, other than general commentary on how applying MDRS or Policy 3 of the NPS would erode those specific characteristics there is no in-depth assessment to explain exactly how allowing that level of development would be inappropriate. For example, test cases could have been used to look at the actual effects on character values from allowing increased development opportunity.	I am confused how Ms Woodbridge can agree that the paragraphs identified by Council do identify the specific characteristics of the character precincts" and that the Council provides "commentary on how applying MDRS of Policy 3 of the NPS would erode those specific characteristics" (ie, make it inappropriate in the area), but at the same time consider that this part of the assessment is not met. I refer to my discussion of Section 77J(3)(a) (ii) above. The specific characteristic of both the Character Precincts and the Mt Victoria North Townscape Precinct has been identified. Bulk and location provisions for both precincts have been aligned with the MDRS. This represents an increase as compared to ODP bulk and location standards. I have made clear that a greater level of development (in line with Policy 3 of the NPS-UD) is considered to be inappropriate. The evidence explains that it would erode the character values of the areas. Provision for a departure from that level of development is of course made through a resource consent process such that site specific considerations can be tested with reference to the outcomes sought for each precinct.	
77L(b) <i>justifies why that characteristic makes that level of development inappropriate in light of the national significance of</i>	Very limited assessment based a reduction in the character area provisions from the ODP and the fact that character is valued by some members of the community.		No real assessment undertaken to assesses why character is more important than providing for the level of development required by the NPS-UD in light of the national significance of urban development and NPS-UD objectives. There does not appear to be any evidence to suggest consideration was given to the national significance of urban	As noted in my comments column I cannot find a specific assessment of protecting character against the Objectives of the NPS-UD. The paragraphs referenced do not contain that assessment. Furthermore, the assessment undertaken within the paragraphs referenced appears either circular in nature or to originate from	I cannot agree that, as Ms Woodbridge says, "the real test is to justify why protecting character values is more important than the national significance of urban development not to consider that the MDRS standards are inappropriate because they would erode character." The wording of s 77L(b) is to justify why that characteristic [the coherent and consistent character present] makes development that policy 3 would otherwise require inappropriate in light of the national significance of urban	

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
<p><u>urban development and the objectives of the NPS-UD</u></p>			<p>development when assessing character as a qualifying matter.</p> <p>No specific assessment against the NPS-UD objectives within the Residential section 32 report, instead readers are referred to the Part 1: Context to section 32 evaluation and evaluation of Strategic Objectives report. This report does not assess Character Precincts against the specific Objectives of the NPS-UD.</p>	<p>an incorrect starting point. Council assessment seems to be based on the premises that to protect character demolition should be restricted and control placed on re-development thereby the scale of development provided for through the MDRS or Policy 3 of the NPS-UD is appropriate. There is also a repeated argument that the PDP has reduced the character areas compared to the ODP when the starting point should be the requirements of Policy 3 of the NPS-UD.</p> <p>The real test is to justify why protecting character values is more important than the national significance of urban development not to consider that the MDRS standards are inappropriate because they would erode character. The starting point for the assessment should therefore, be what do the Objectives of the NPS-UD require and how does protecting character weigh against these Objectives and the national significance of urban development.</p> <p>The Wellington City Qualifying Matters Assessment November 2022 – property Economics report does not provide justification for downgrading the character areas it simply highlights that there is capacity in the remainder of the City to meet or exceed demand. This is not a justification to explain why the specific characteristics of character are more important than the Objectives of the NPS-UD in light of the national significance of urban development.</p>	<p>development and the objectives of the NPS-UD. It is not a balancing of the <i>importance</i> of competing objectives. Ms Woodbridge has applied the wrong test.</p> <p>The phrase “national significance of urban development” reflects that urban development is a matter justifying a national policy to direct how the matter is provided for (see section 45). It does not relevant urban development to a matter of national importance in terms of section 6 of the RMA.</p> <p>As outlined above, the PDP approach has identified the characteristics of the areas proposed as qualifying matters and identified why the level of permitted development under the MDRS, and the level of development provided for by Policy 3, is inappropriate with regard to managing those characteristics.</p> <p>The PDP has responded to the national significance of urban development, firstly, by significantly narrowing the application of the Character Precincts from the extent covered by the ODP. I agree with Ms Woodbridge that this is not the starting point, but it demonstrates that the modification of building height and density is to the least extent necessary to accommodate the qualifying matter and reflects the national significance of urban development. Further, while the section also refers to the objectives of the NPS-UD, the objectives are given effect to through policy 3.</p> <p>Secondly, the PDP has ensured that the development capacity that it enables is significantly in excess of projected demand over the long-term. This achieves consistency with Objective 2 of the NPS-UD.</p> <p>Objective 1 of the NPS-UD requires that New Zealand has well-functioning urban environments that enable all people to provide for their social, economic and cultural wellbeing. Policy 1 in turn defines a well-functioning urban environment. This definition includes having or enabling a variety of homes meeting a variety of needs in terms of type, price and location.</p> <p>Maintaining character protection in the Character Precincts, and managing new development in the Mt Victoria North Townscape Precinct is consistent with the Policy 1 direction of providing for a variety of housing typologies, while ensuring that at least sufficient development capacity is provided for in accordance with Policy 2, and providing for Policy 3 matters in areas outside of the precincts.</p> <p>The PDP has therefore sought to strike a balance of managing the particular characteristics of the precincts while giving effect to the NPS-UD as a whole and appropriately applying qualifying matters as provided for by the NPS-UD.</p>	

Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
77L(c) includes a site-specific analysis that:						
(i) identifies the site to which the matter relates	<p>The following documents in combination identify the sites to which the matter relates:</p> <ul style="list-style-type: none"> • Boffa Miskell pre-1930 Character Area Review • Wellington City Council Pre-1930 Character Area Review Story Map • Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct 		I consider this test satisfied.	I agree that the Council has undertaken assessment which identify the sites to which the matter relates, the references provided demonstrate that assessment has been undertaken.	No comment necessary	
(ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter	The Boffa Miskell pre-1930 Character Area Review identifies the specific characteristic on a site-specific basis to determine the geographic area.		<p>I consider this test generally satisfied.</p> <p>However, the assessment could have gone further to consider building condition given this is a matter on which demolition may be approved. Although I appreciate this is something which changes over time.</p> <p>Furthermore, the assessment should have also undertaken a site specific analysis to understand if intensification needs to be compatible on every site. For example, if a building which is detractive is demolished and the site redeveloped what is the specific characteristic of that site which intensification should be compatible with.</p>	<p>The Boffa Miskell Pre-1930 Character Area Review and the Urban Perspectives - Mt Victoria North Townscape Precinct Urban Design Review provide information on the specific characteristics on a site-specific basis but do not evaluate why intensification needs to be compatible with those specific characteristics on a site specific basis.</p> <p>Council's assessment in the paragraphs referenced considers the effects of development on the character values of the precincts which is based on a streetscape approach. However, the test is to understand if intensification on a site-by-site basis would be incompatible with the specific characteristics of the site – not the streetscape or a wider area.</p>	<p>I cannot agree that the distinction Ms Woodbridge draws between providing information on the specific characteristics [justifying the qualifying matter] on a site-specific basis, which she accepts, and evaluating why intensification needs to be compatible with those specific characteristics on a site specific basis, which she does not, is what the legislation expects.</p> <p>The evidence demonstrates a site-by-site assessment of the quality of character in each area. Where the quality is inadequate to justify not implementing the MDRS, those areas have been pruned, so what if left are sites that in my professional opinion justify protection from incompatible intensification. I accept that people may disagree with where I consider the appropriate boundaries to be, but I do not consider that the disagreement means that this aspect of the test has not been met.</p> <p>The requirement has been satisfied for both the Character Precincts and the Mt Victoria North Townscape Precinct.</p> <p>In respect of building condition, the Boffa Miskell assessment made the following comment:</p> <p><i>“With the exception of circumstances where properties and/or their associated buildings were in a clearly dilapidated state, the existing physical condition of the properties reviewed was not assessed in determining the extent to which they contributed to the character of an area as condition is a factor that can be altered/improved/reversed over time (e.g. physical improvements due to a change in property ownership).”</i></p> <p>Building condition is an appropriate matter to consider, in detail, in any resource consent process for demolition. It was not considered to be an appropriate factor in assessing character contribution.</p>	

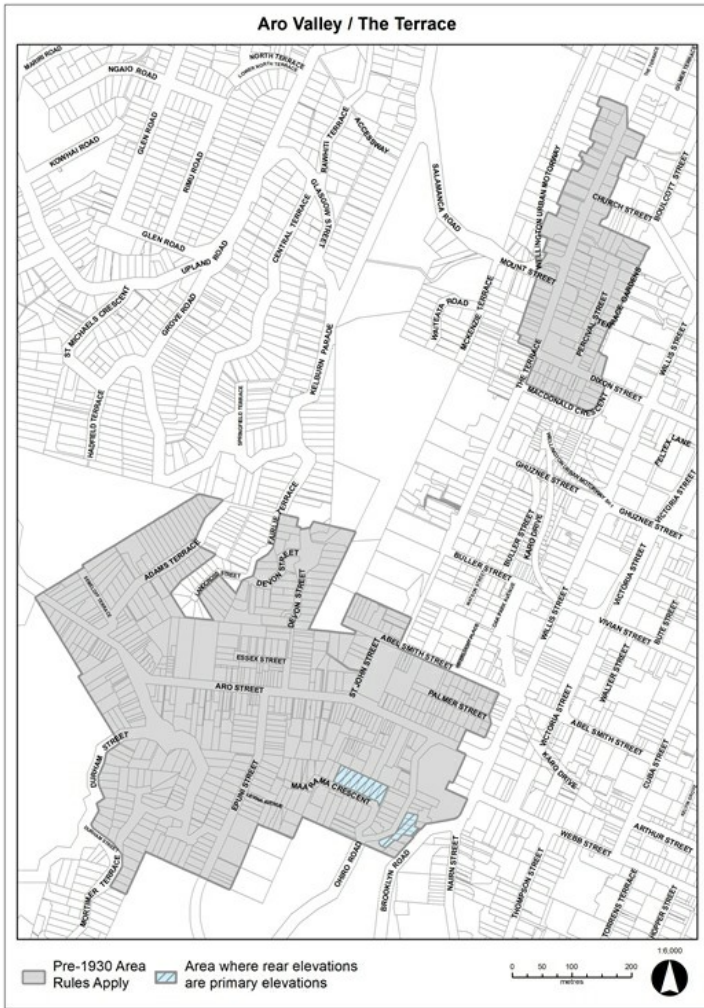
Section	Council Assessment	Kāinga Ora Compliance Assessment	Kāinga Ora Comment on Council's Assessment	Kāinga Ora Response to Council's Table Outlining Compliance	Council Comment	Council Compliance Assessment
					I disagree that a further level of site specific analysis should have been undertaken to “understand if intensification needs to be compatible on every site.” The specific characteristics of a given Character Precinct which new development needs to respond to are outlined in the Character Precincts Appendix to the Residential Design Guide. The MDRS bulk and location standards remain appropriate to guide the overall form of development in a manner proportionate with the existing built form of these areas.	
<p>(iii) evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS (as specified in Schedule 3A) or as provided for by policy 3 while managing the specific characteristics</p>	<p>The Section 32 Evaluation Report – Part 2: Character Precincts and the Mt Victoria North Townscape Precinct does not consider a sufficiently broad range of options to achieve the greatest heights and densities permitted by the MDRS or provided for by Policy 3 whilst managing the specific characteristics.</p>		<p>The range of options considered is too narrow. The Section 32 Evaluation Report– Part 2: Character Precincts and the Mt Victoria North Townscape Precinct assesses the following options:</p> <ul style="list-style-type: none"> • Proposed approach (PDP as notified) • Status Quo (ODP) • Alternative Approach – No Objective, Policies, Rules or other methods <p>An example of an alternative assessment would be to assess applying a HRZ with amended standards, such as reduced height.</p> <p>However, the options considered do not relate to a site-specific analysis i.e. how would the specific provisions and options apply to each specific site.</p>	<p>As noted in my comments column the tables in Section 11 of the Section 32 Evaluation Report are, in my view, too narrow in their range of options and do not consider a site specific analysis of how the greatest heights and densities permitted by the MDRS or provided for in Policy 3 of the NPS-UD can be provided while managing character values.</p> <p>I note this test relates to managing specific characteristics, whereas the PDP policy approach is to maintain or enhance, or minimise the erosion of character values which in my opinion are not managing but seek to preserve and protect.</p>	<p>I consider that an appropriate range of options were considered.</p> <p>Specifically, the proposed approach is to align with the MDRS standards, with the modifications regarding new development and demolition already outlined.</p> <p>A continuation of the ODP in respect of the Character Precincts is not appropriate given the need to balance character protection against the requirements of Policy 3 of the NPS-UD.</p> <p>The alternative approach would have given effect to the MDRS and Policy 3 with no character protection.</p> <p>Given that a permitted level of MDRS development was not considered appropriate given the potential effects on the characteristics of these areas, and that the bulk and location standards have been set at a level that is consistent with the built form of these areas, any increased height standards would be incompatible with the existing level of built form in these areas. Again, this level of assessment is in my view appropriately undertaken at a precinct level given the consistency of built form and the similarity of issues that arise. In other words, the options evaluation was suitably site-specific.</p> <p>I disagree that the PDP seeks to “preserve and protect” – that is not evident from the wording of the relevant objective and policies which do provide for new development – in a manner that responds to, and maintains and enhances, the values of the relevant precinct.</p>	

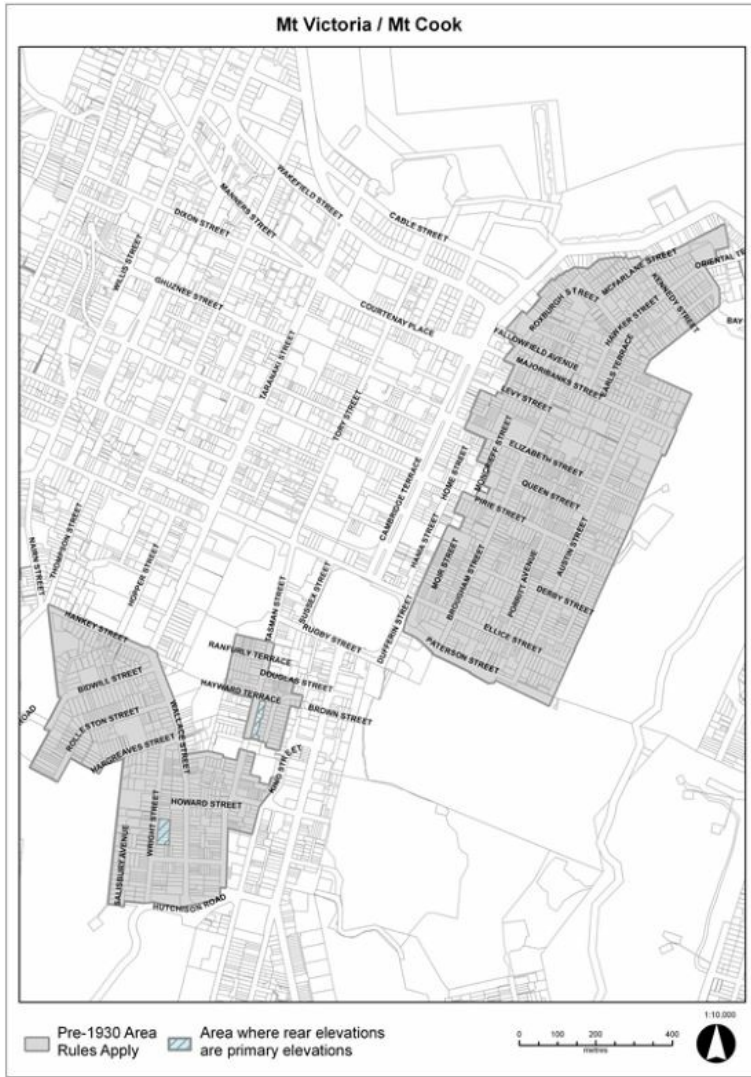
APPENDIX 2 – OPERATIVE DISTRICT PLAN CHARACTER AREAS

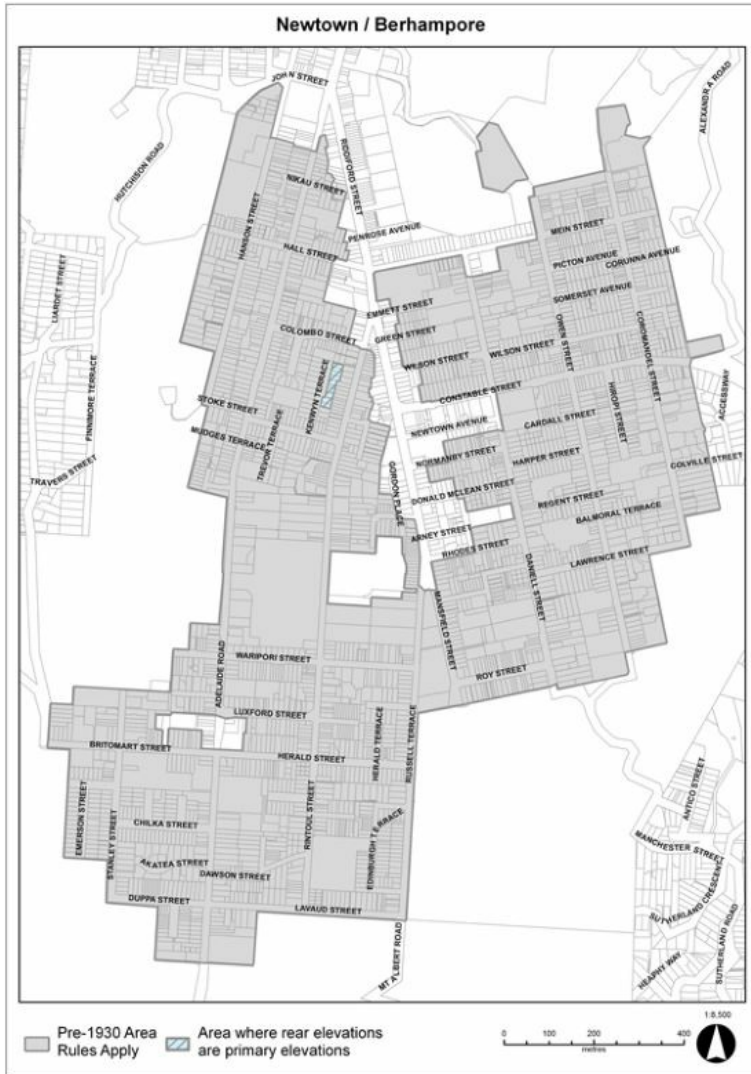
Appendix 1. Residential Areas where pre-1930 demolition controls apply







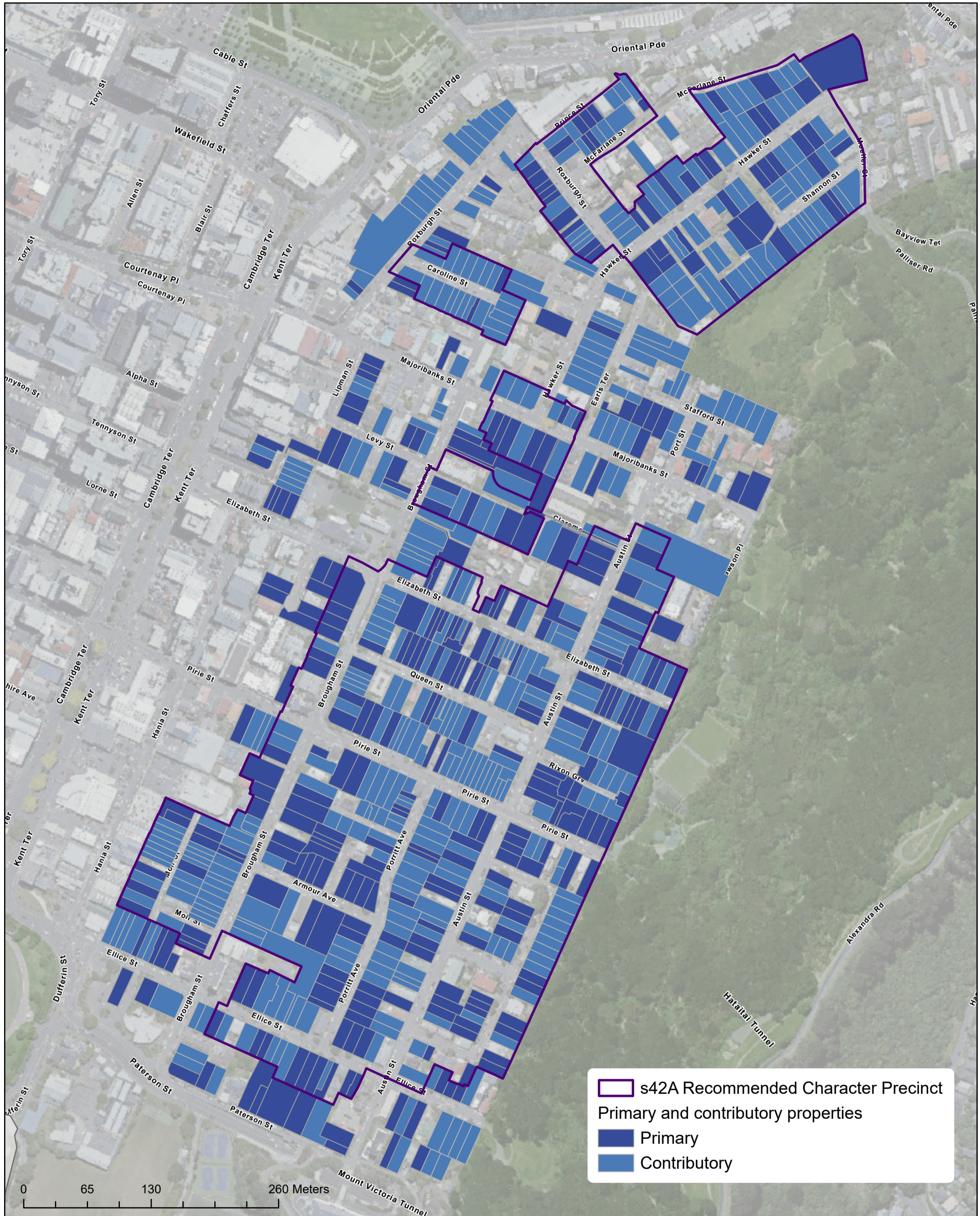




Appendix 2. Residential Coastal Edge

APPENDIX 3 – LOWER KELBURN MAPS

APPENDIX 4 – PRIMARY AND CONTRIBUTORY PROPERTIES



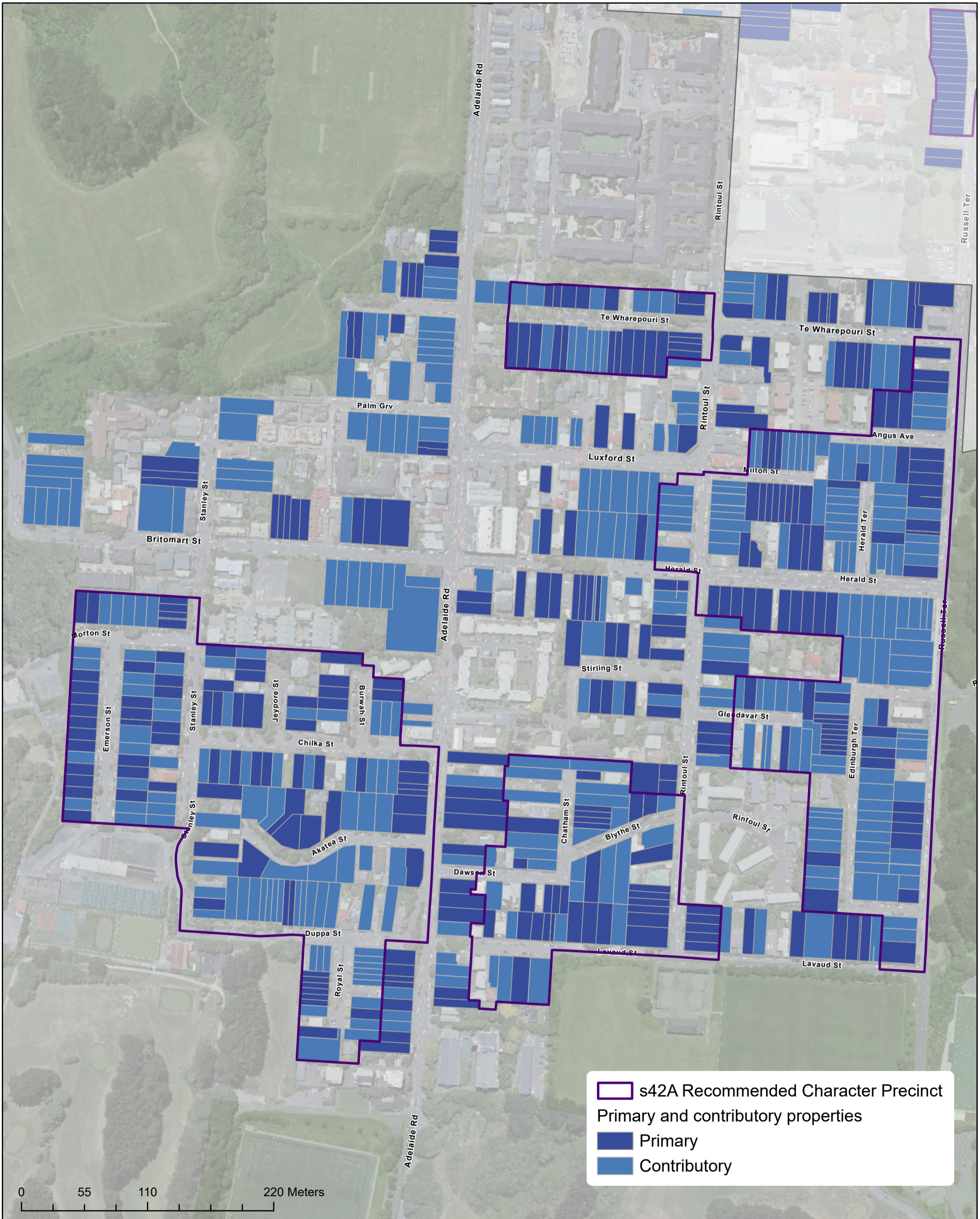
Primary and contributory properties - Mount Victoria

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



Primary and contributory properties - Berhampore

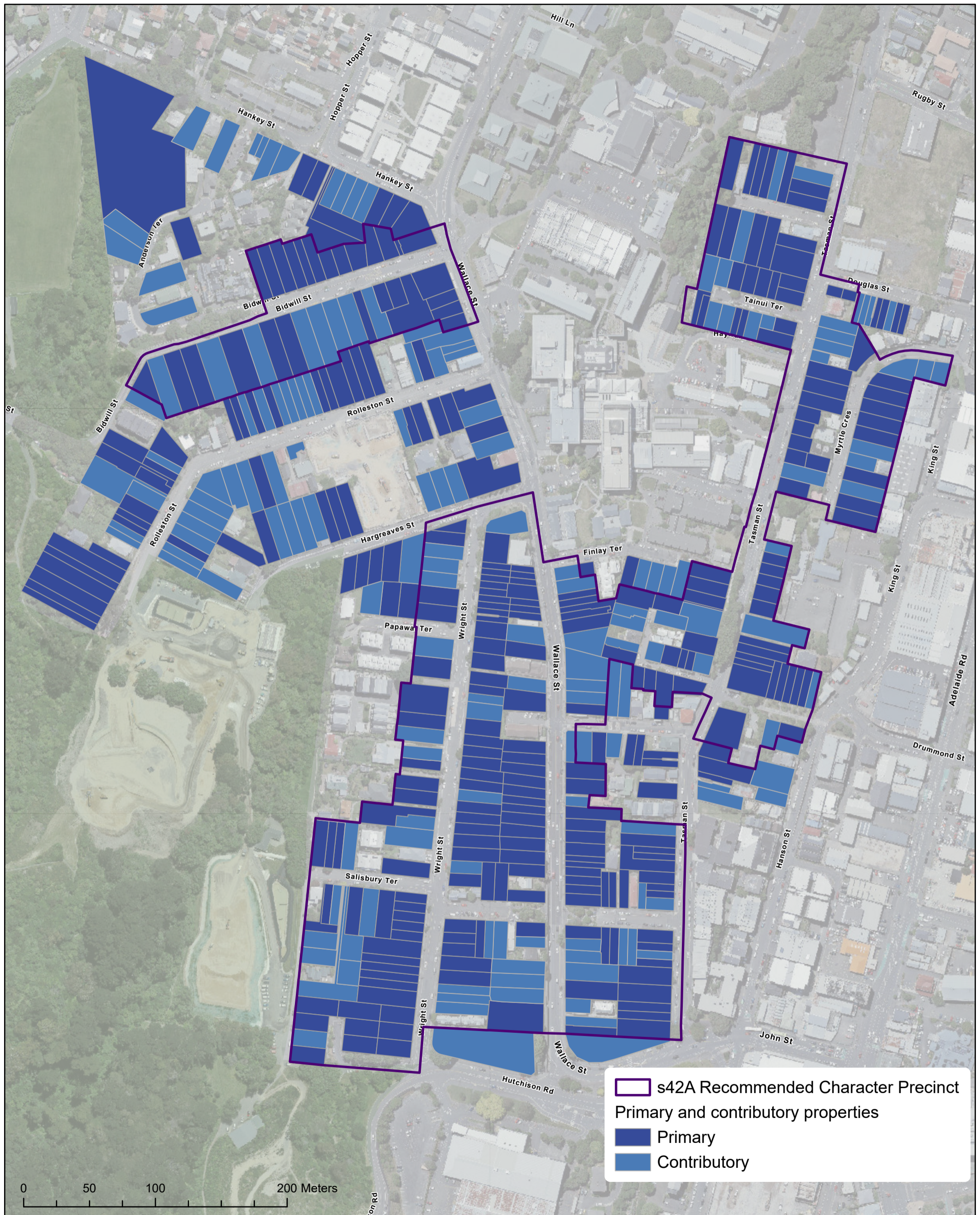
Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

Stream 2 Right of Reply Character Precincts



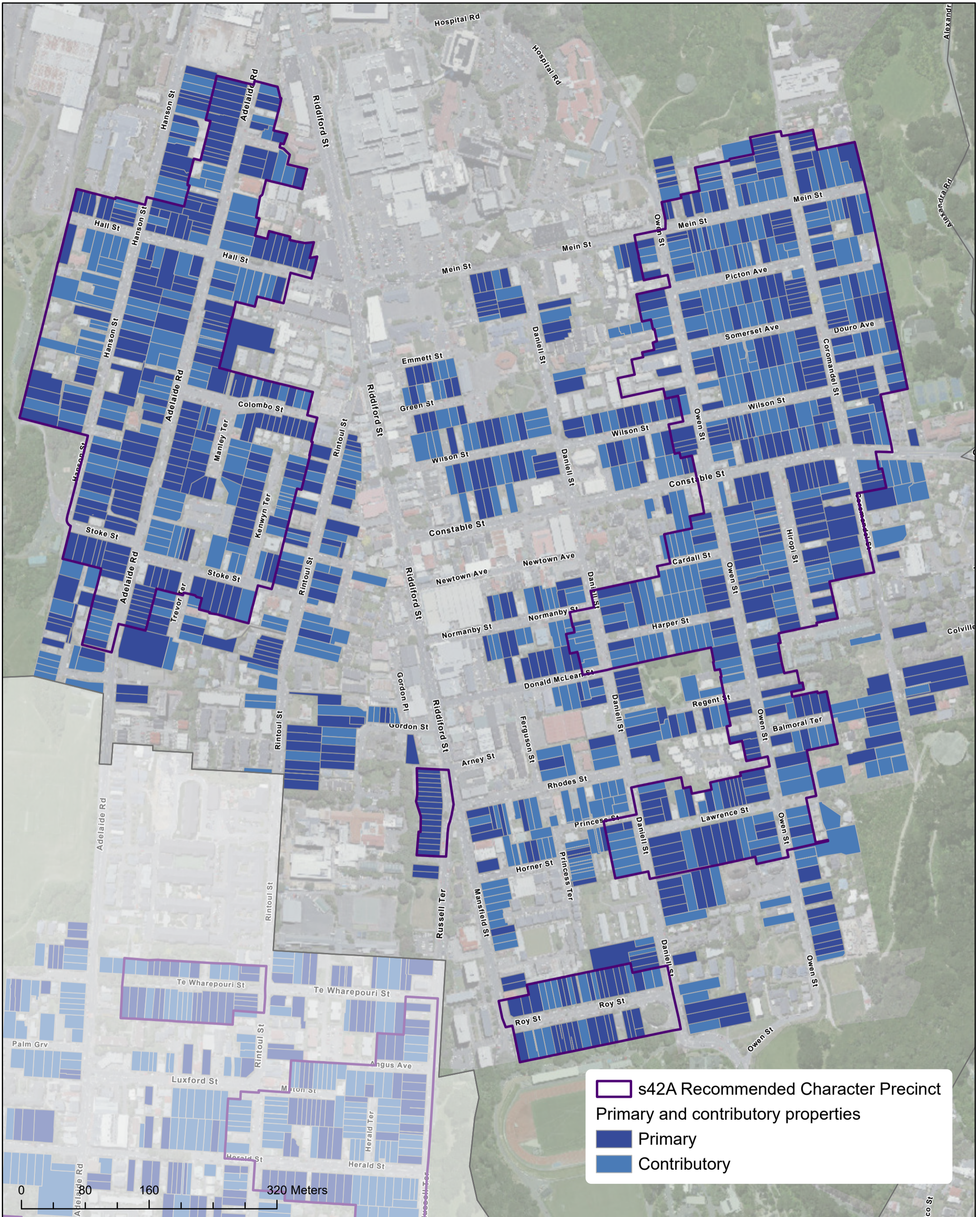
Primary and contributory properties - Mount Cook

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



Primary and contributory properties - Newtown

Date: 26/05/2023

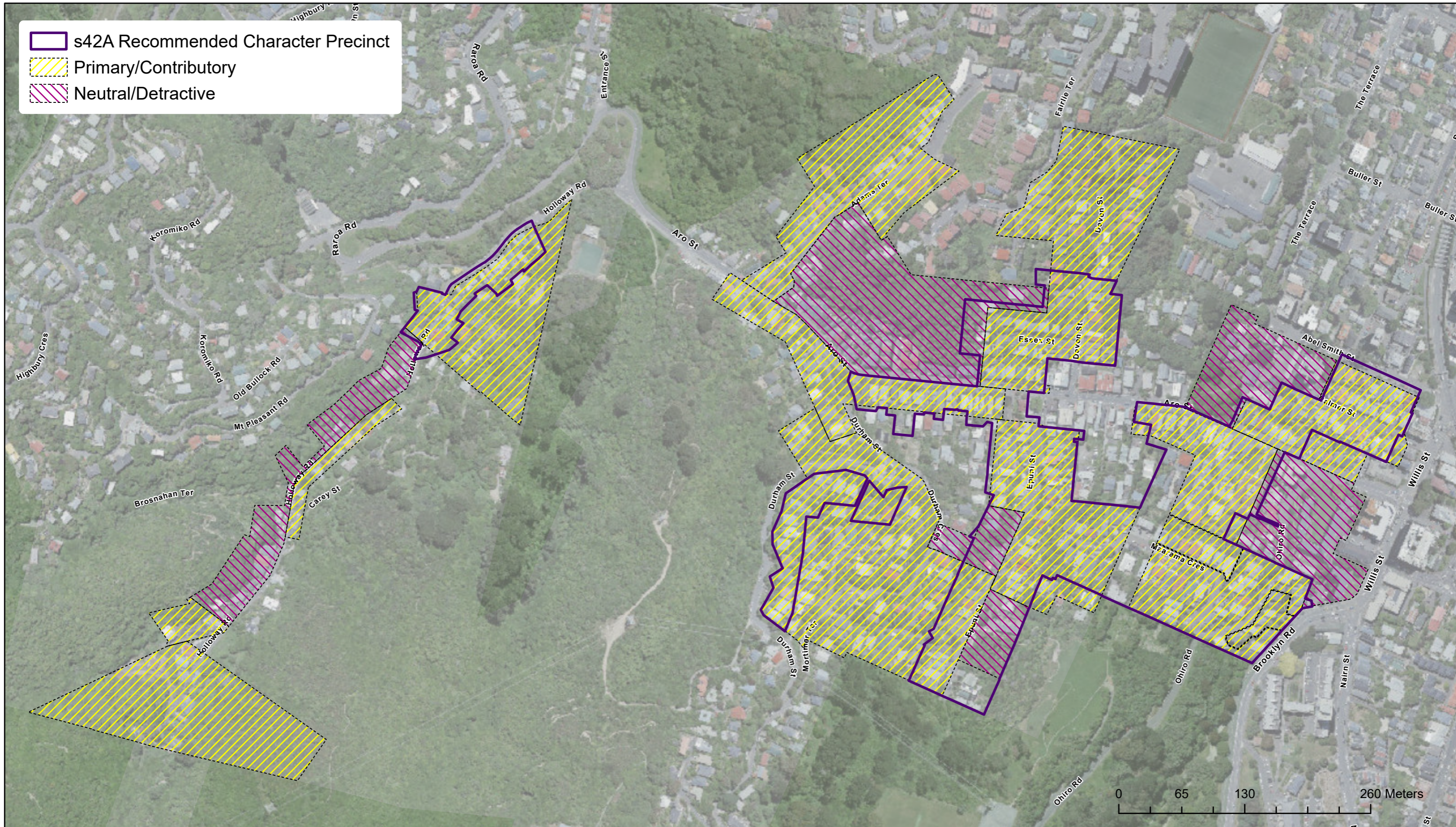
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 5 – PRE-1930 CHARACTER AREA REVIEW INDICATIVE CHARACTER SUB-AREAS

Stream 2 Right of Reply Character Precincts



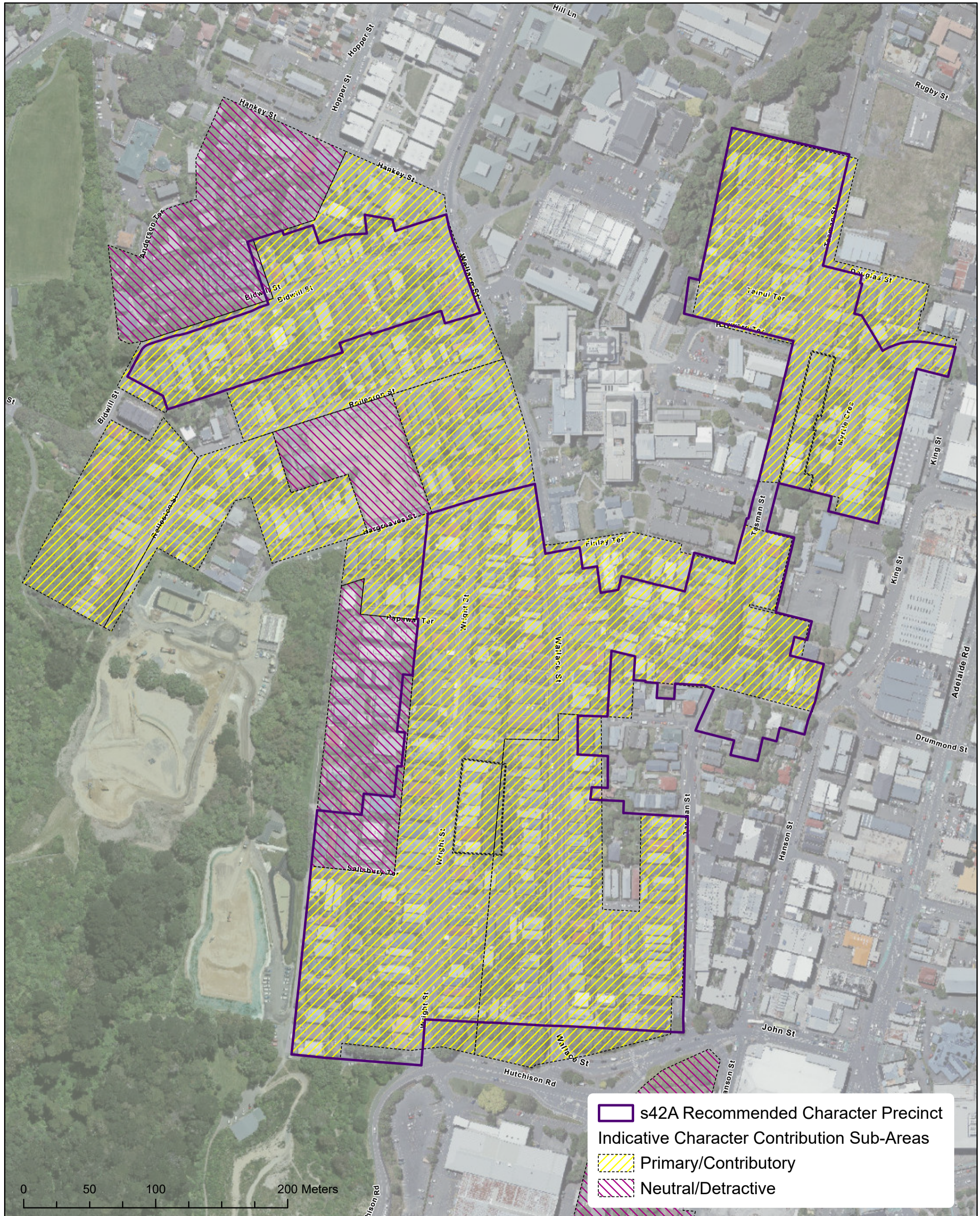
Pre-1930 Character Area Review Indicative Character Sub-Areas - Aro Valley

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



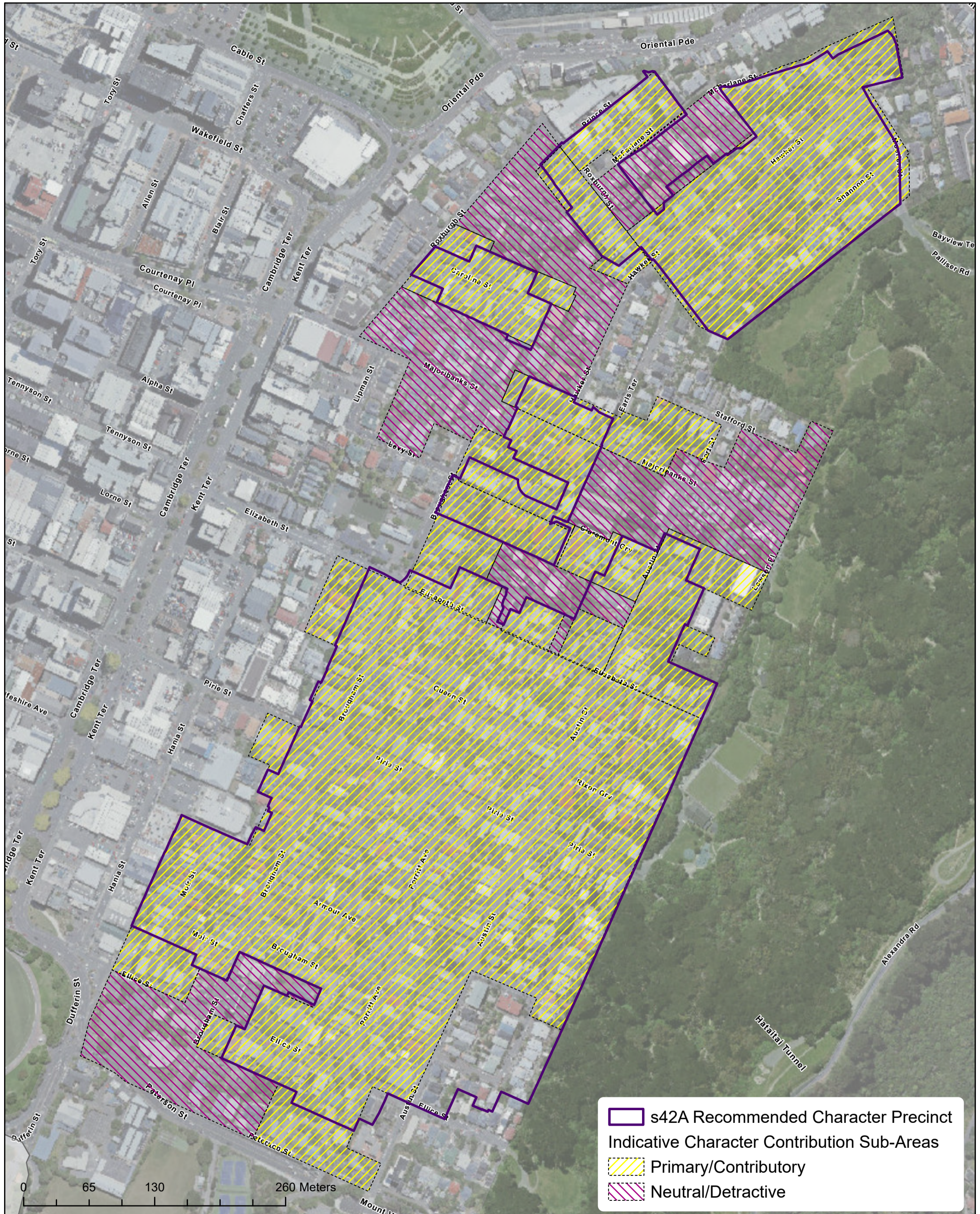
Pre-1930 Character Area Review Indicative Character Sub-Areas - Mount Cook

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



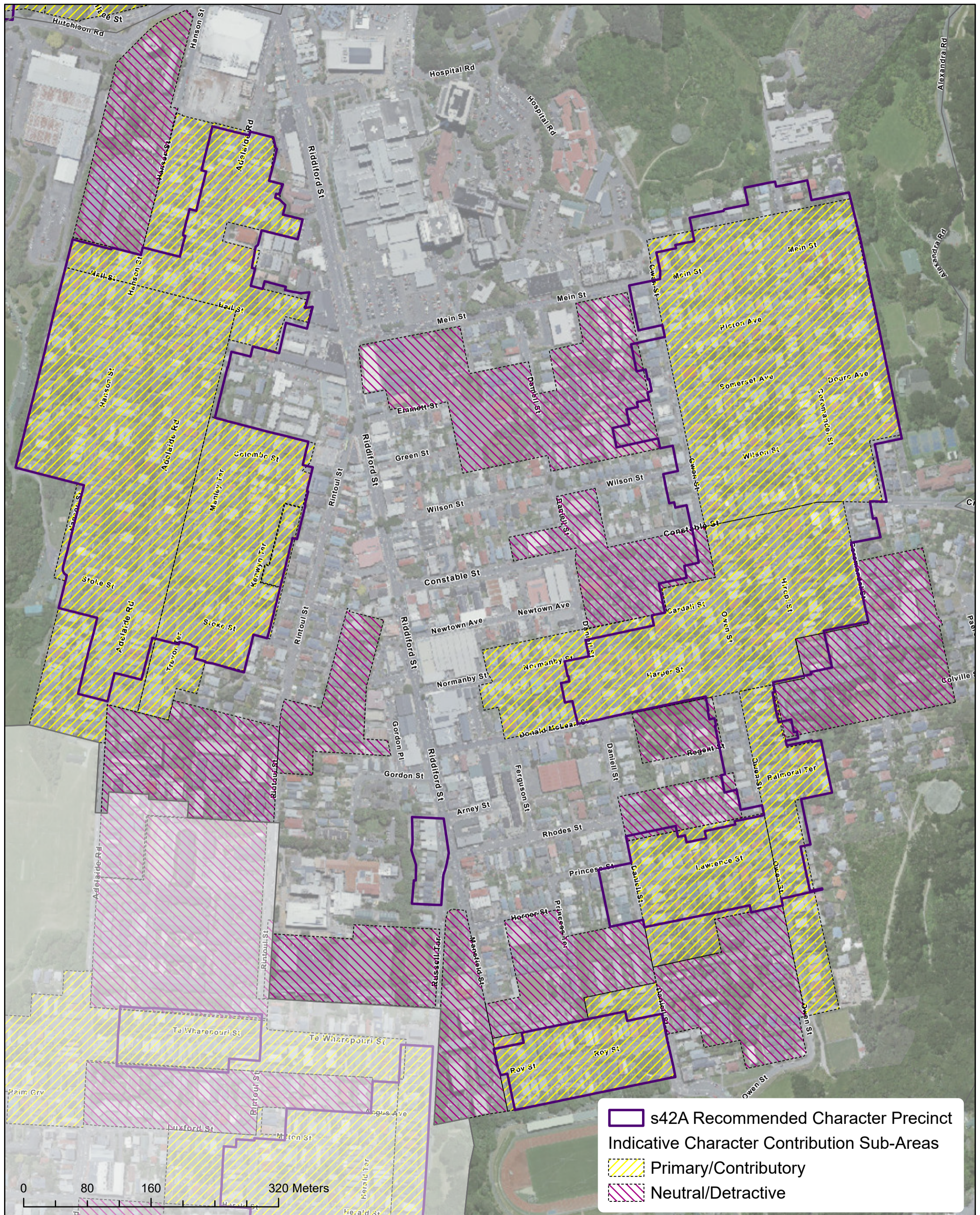
Pre-1930 Character Area Review Indicative Character Sub-Areas - Mount Victoria

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



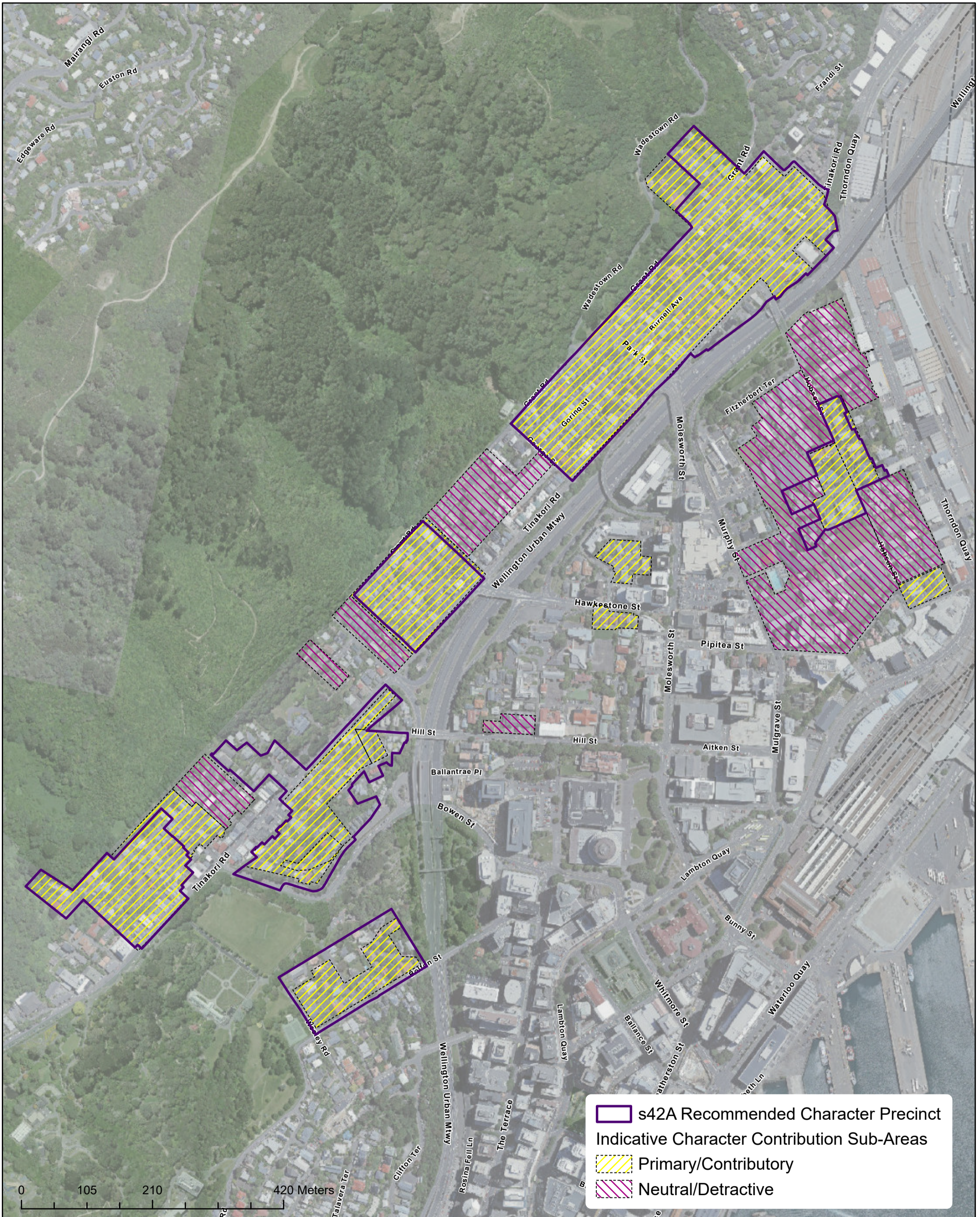
Pre-1930 Character Area Review Indicative Character Sub-Areas - Newtown

Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



Pre-1930 Character Area Review Indicative Character Sub-Areas - Thorndon

Date: 26/05/2023

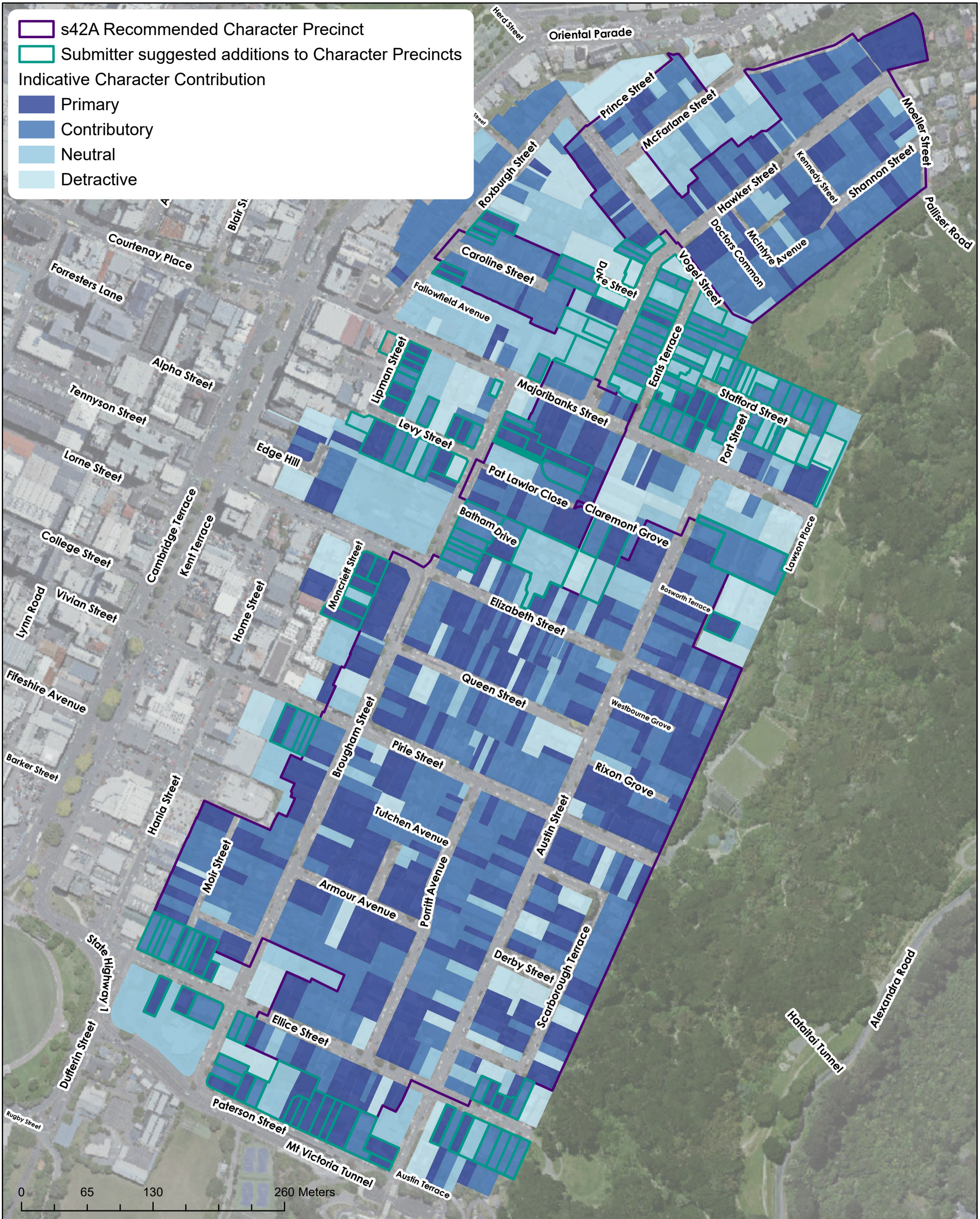
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 6 – SUBMITTER SUGGESTIONS – MT VICTORIA

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Mount Victoria

Date: 26/05/2023

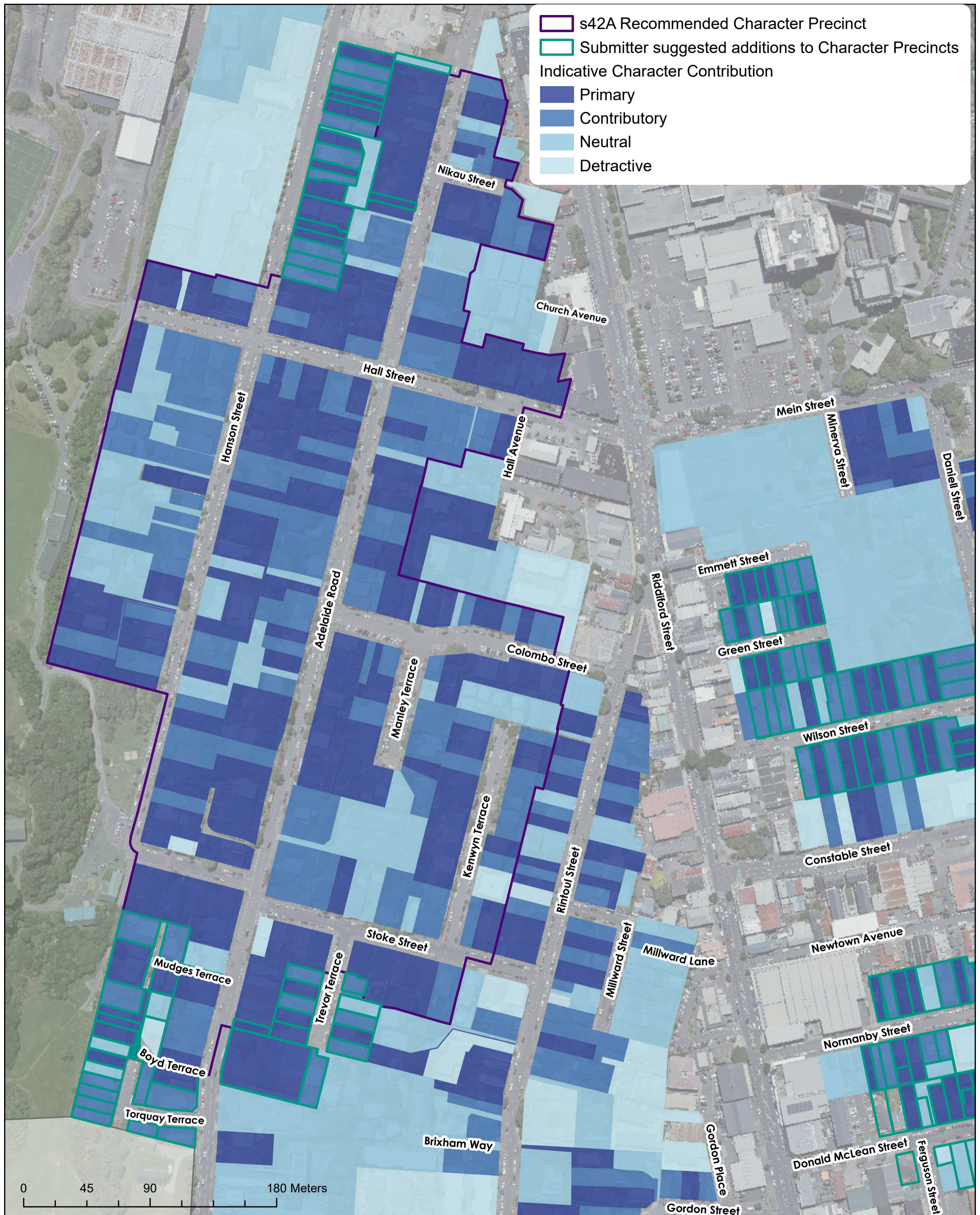
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 7 – SUBMITTER SUGGESTIONS – NEWTOWN

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Newtown

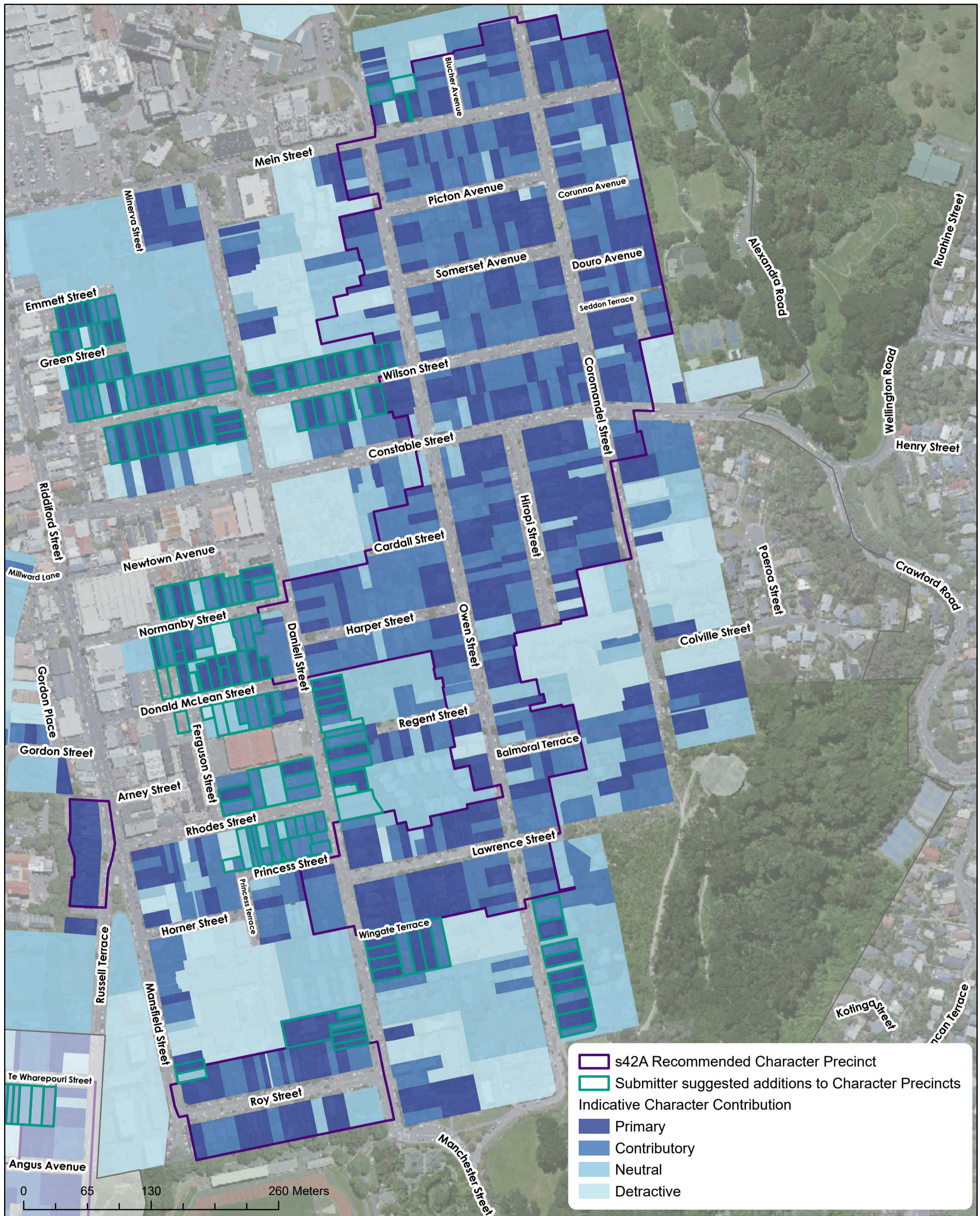
Date: 29/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

Stream 2 Right of Reply Character Precincts



s42A Recommended Character Precinct
 Submitter suggested additions to Character Precincts
 Indicative Character Contribution
 Primary
 Contributory
 Neutral
 Detractive

Submitter suggested additions - Newtown

Date: 29/05/2023

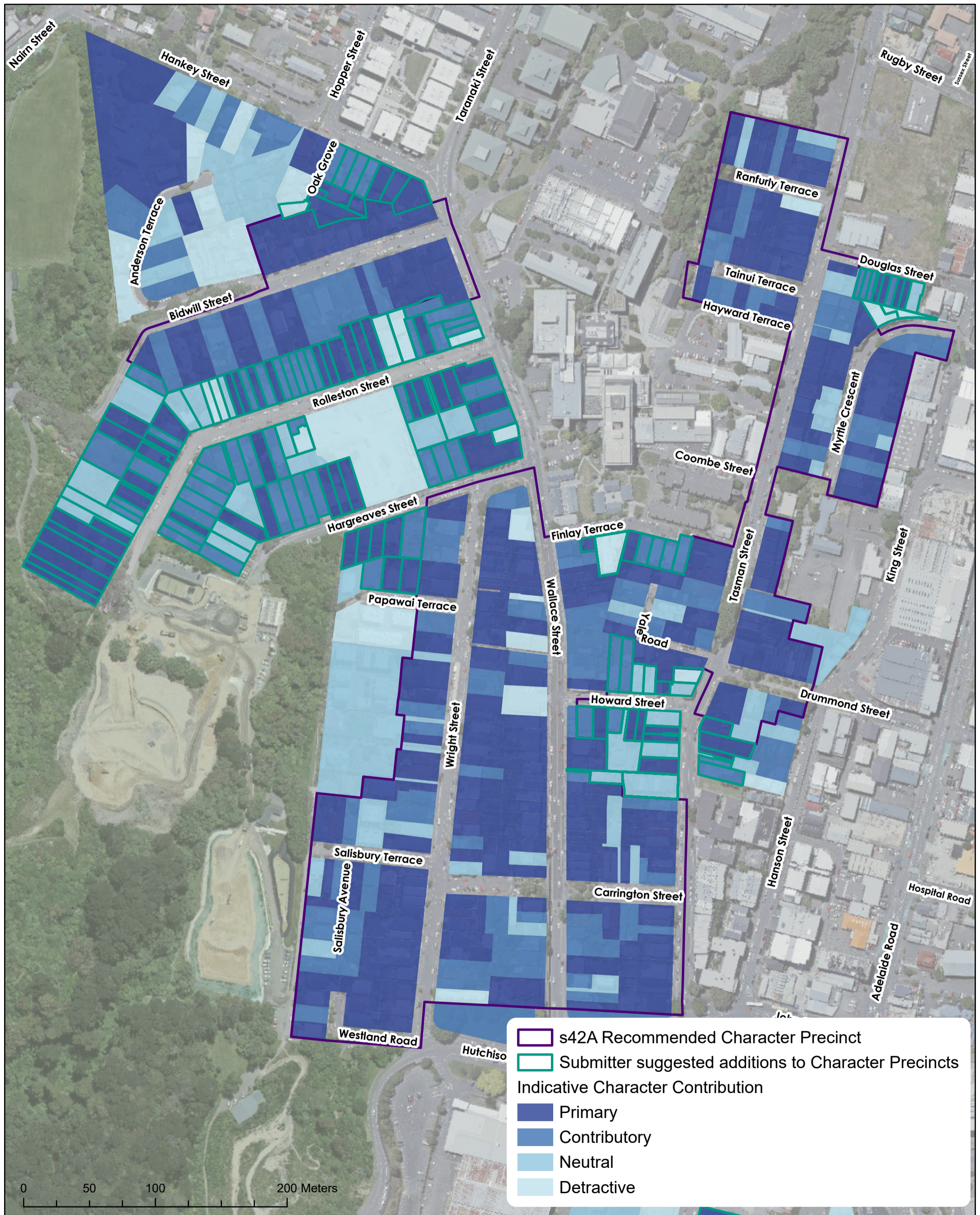
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 8 – SUBMITTER SUGGESTIONS – MT COOK

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Mount Cook

Date: 26/05/2023

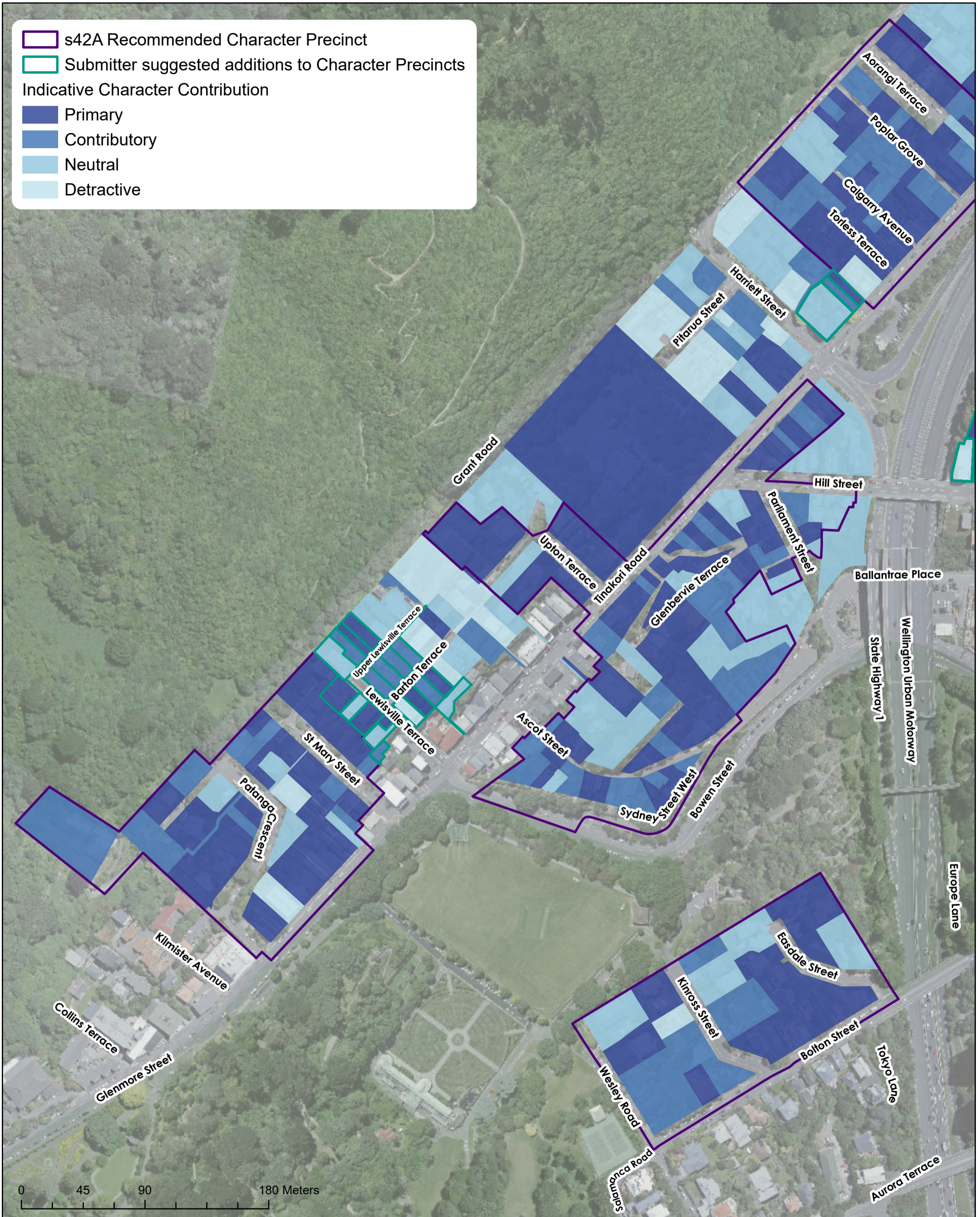
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 9 – SUBMITTER SUGGESTIONS – THORNDON

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Thorndon

Date: 26/05/2023

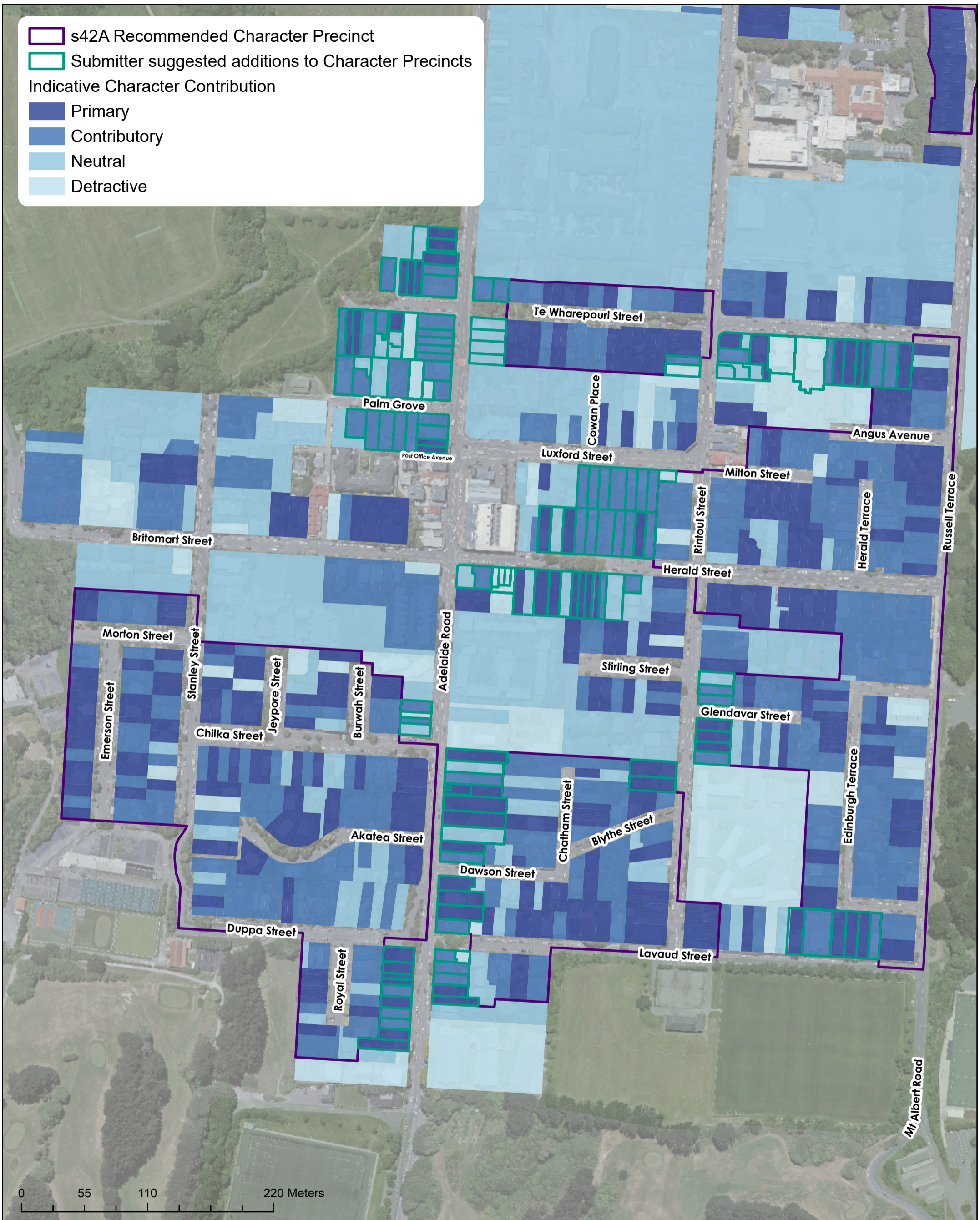
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 10 – SUBMITTER SUGGESTIONS – BERHAMPORE

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Berhampore

Date: 26/05/2023

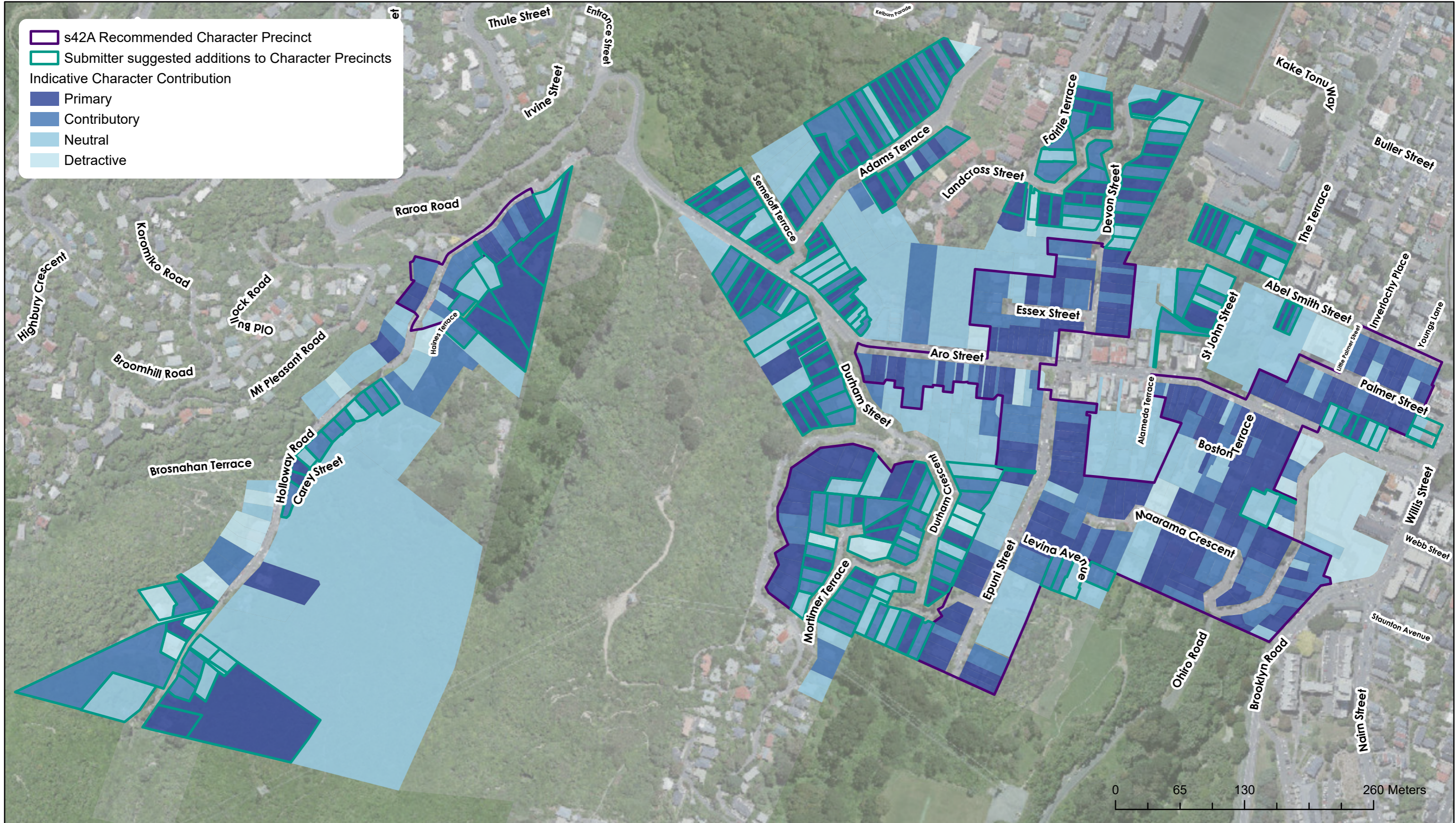
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 11 – SUBMITTER SUGGESTIONS – ARO VALLEY

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - Aro Valley

Date: 26/05/2023

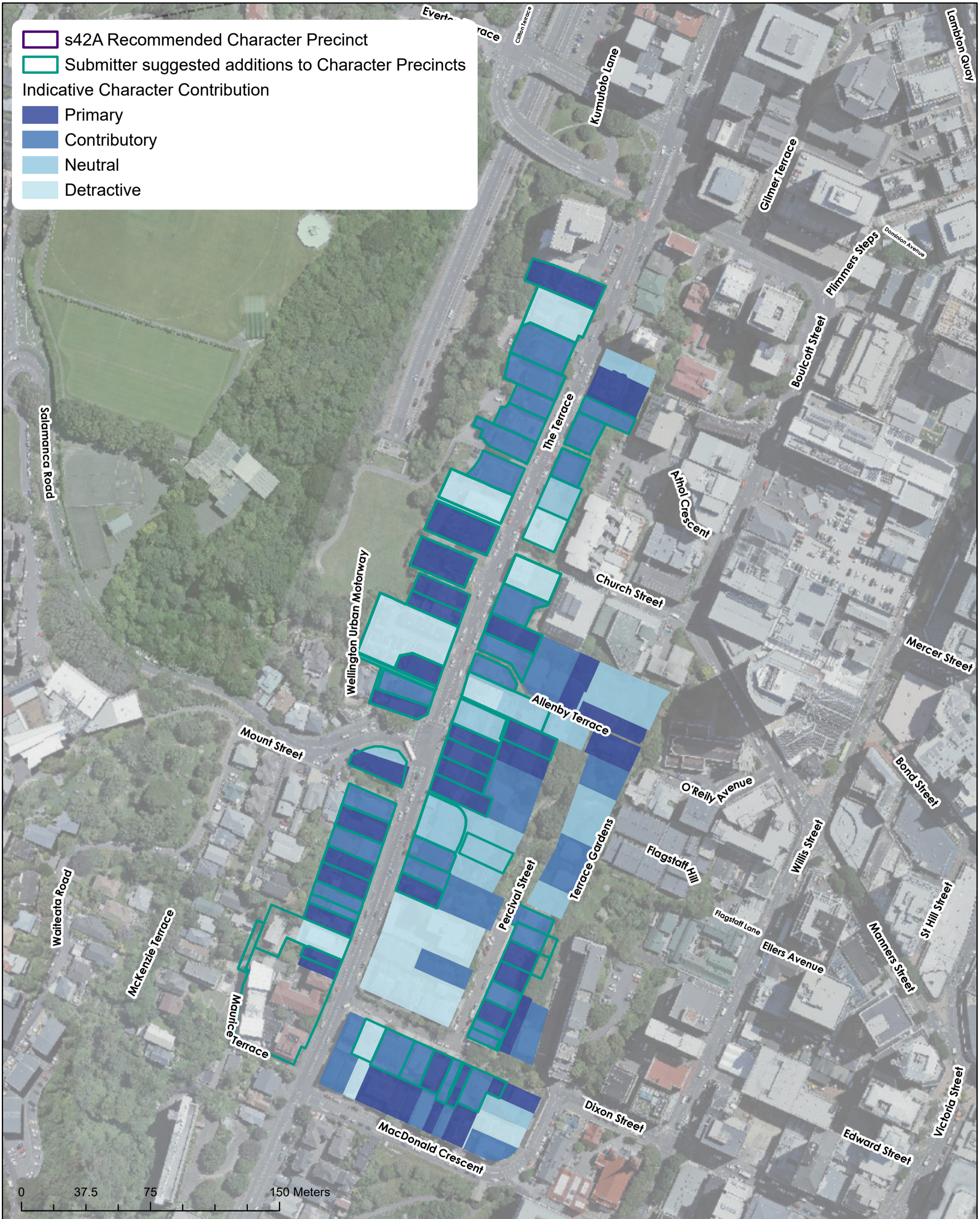
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 12 – SUBMITTER SUGGESTIONS – THE TERRACE

Stream 2 Right of Reply Character Precincts



Submitter suggested additions - The Terrace

Date: 26/05/2023

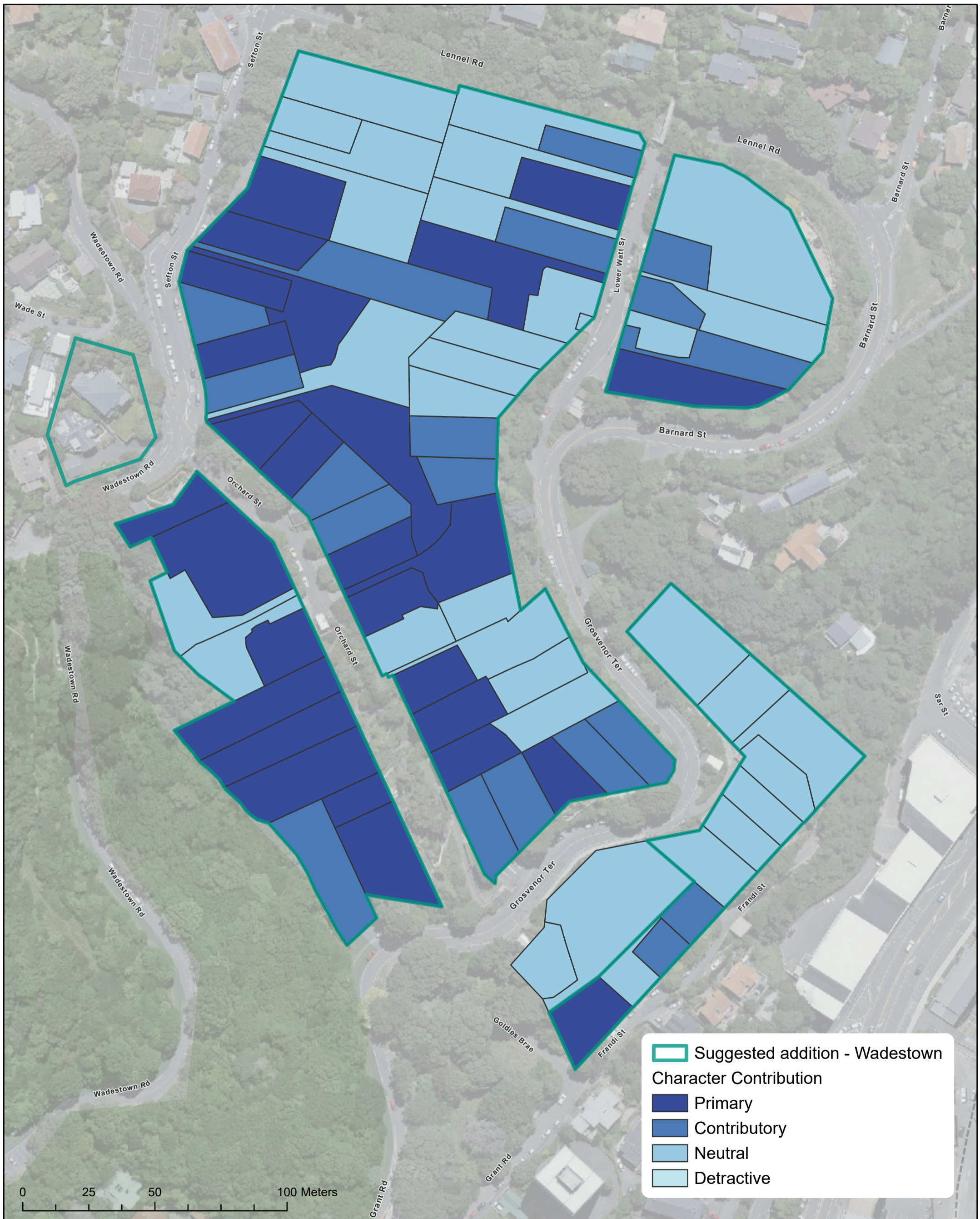
Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 13 – SUBMITTER SUGGESTIONS – WADESTOWN

Stream 2 Right of Reply Character Precincts



Suggested addition to Character Precincts and Indicative Character Contribution - Wadestown

Date: 24/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 14 – SUBMITTER SUGGESTIONS – 4 VOGEL STREET



4 Vogel Street

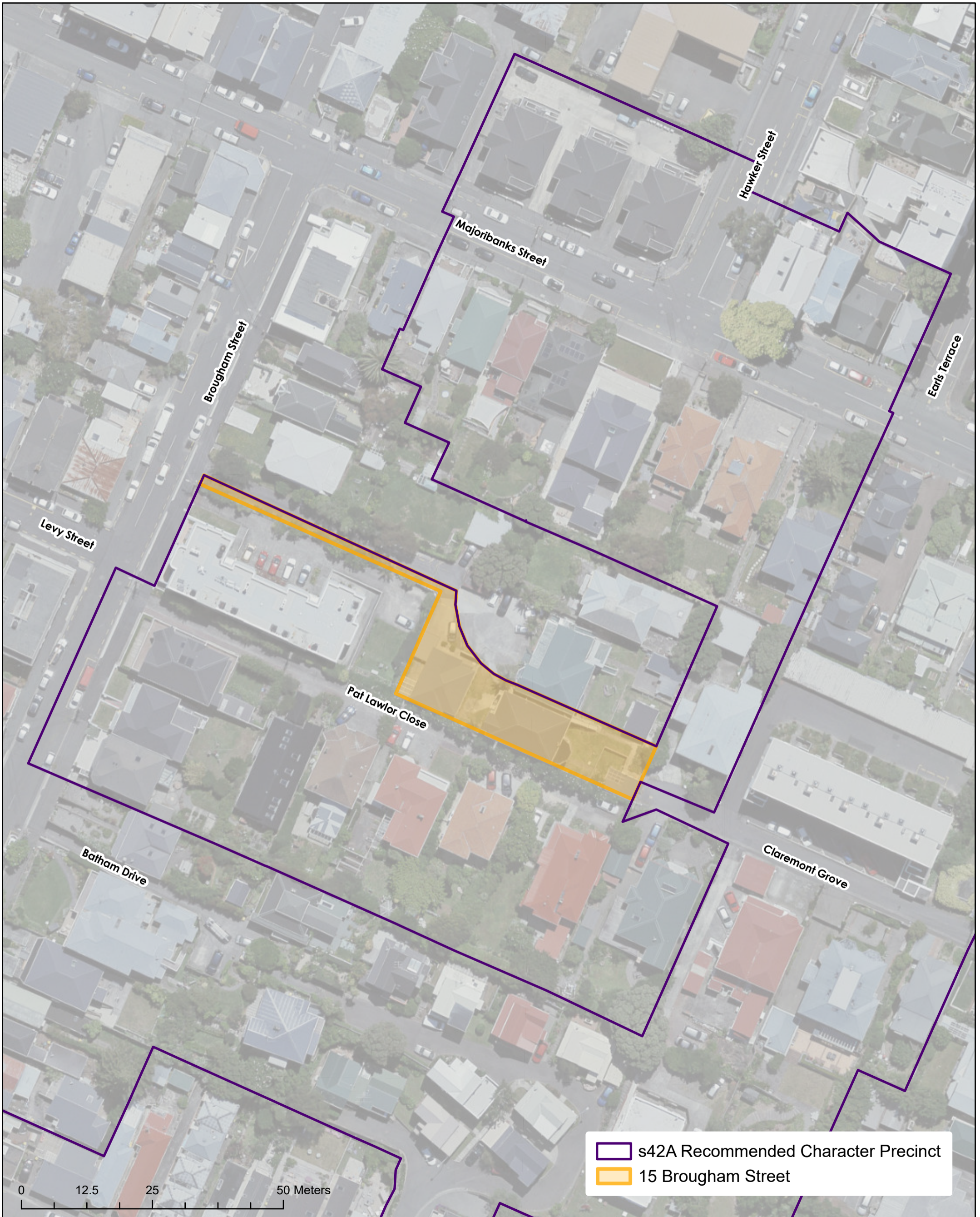
Date: 26/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors

APPENDIX 15 – 11-15 BROUGHAM STREET



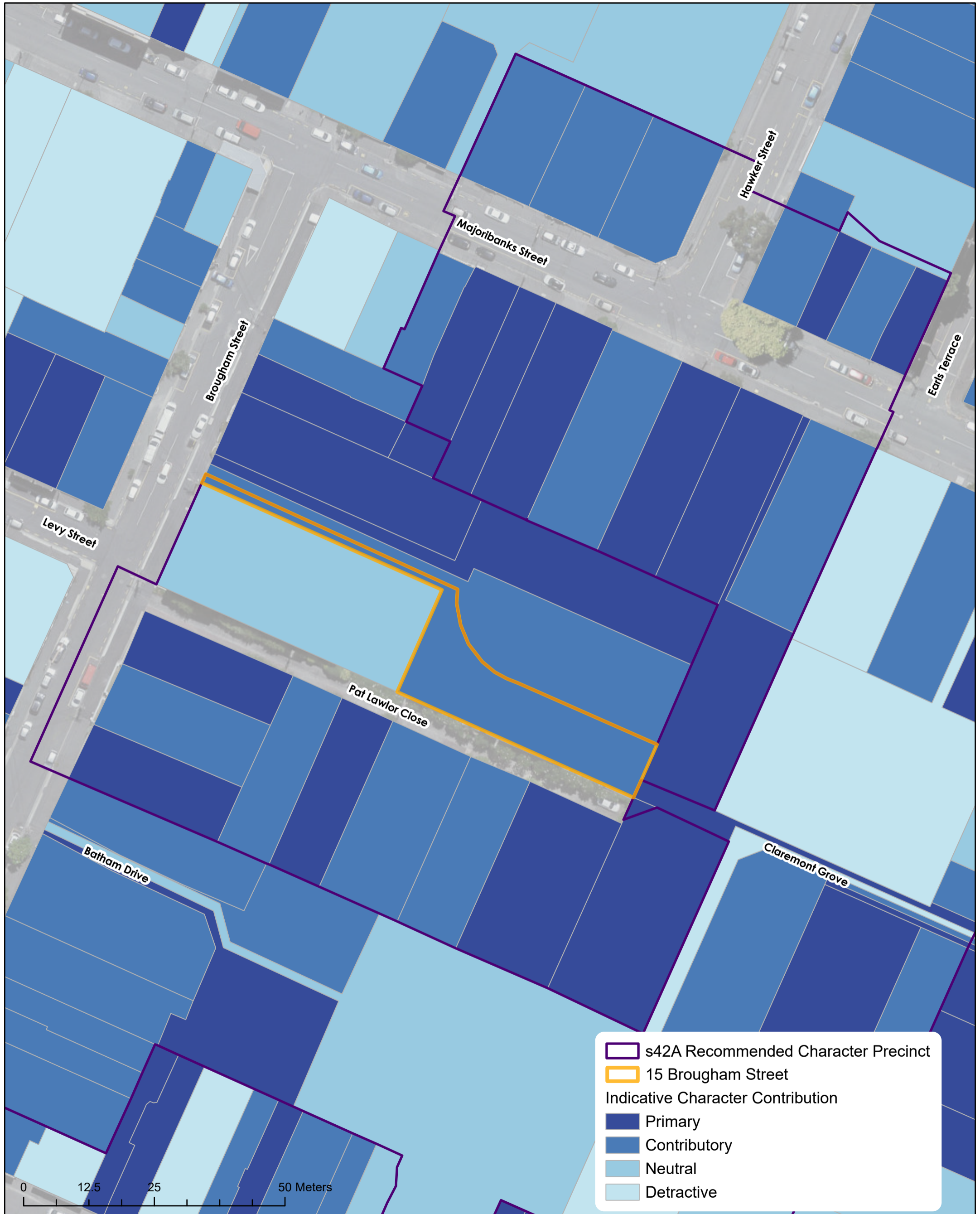
15 Brougham Street

Date: 29/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



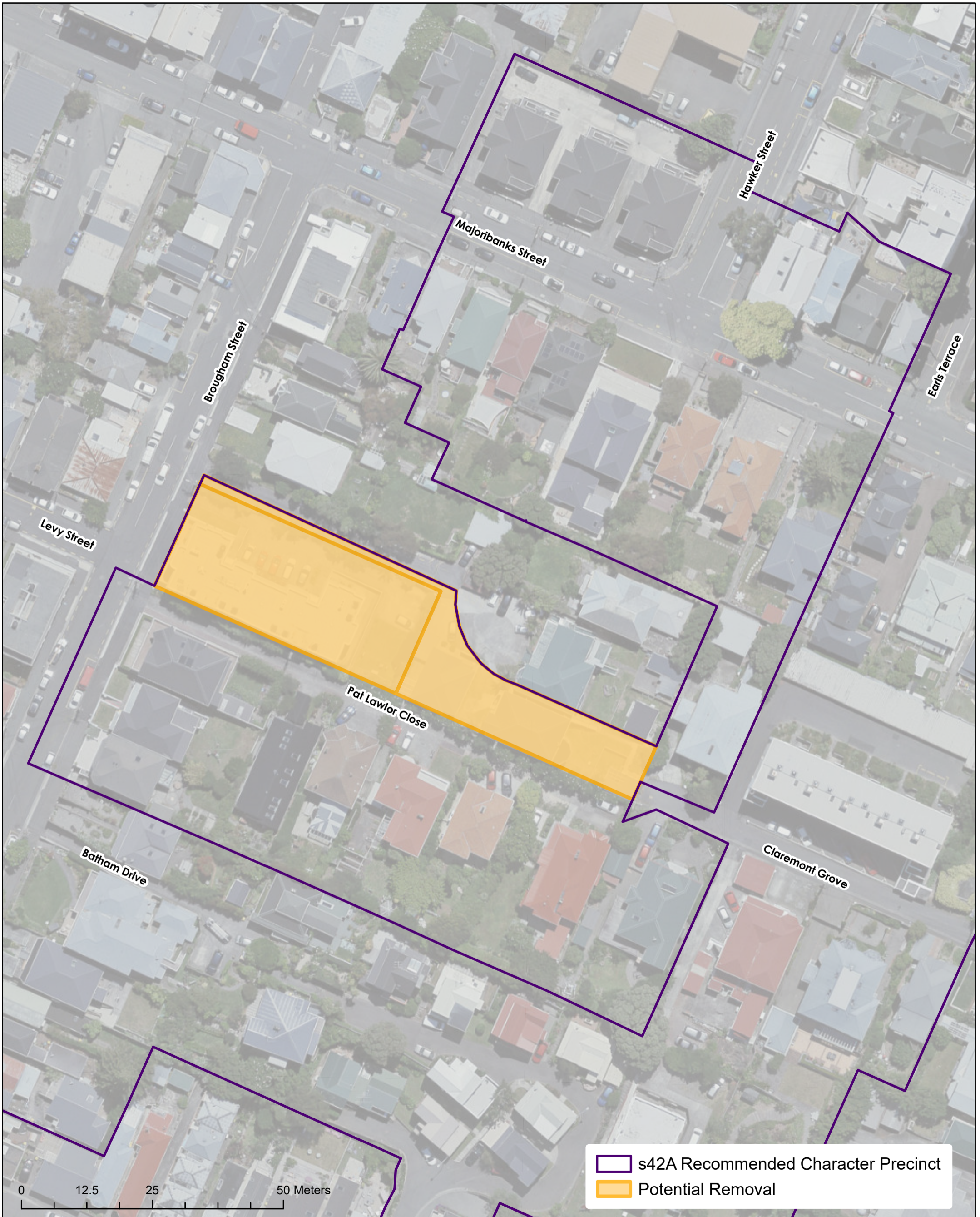
11-15 Brougham Street - Character Contribution

Date: 29/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



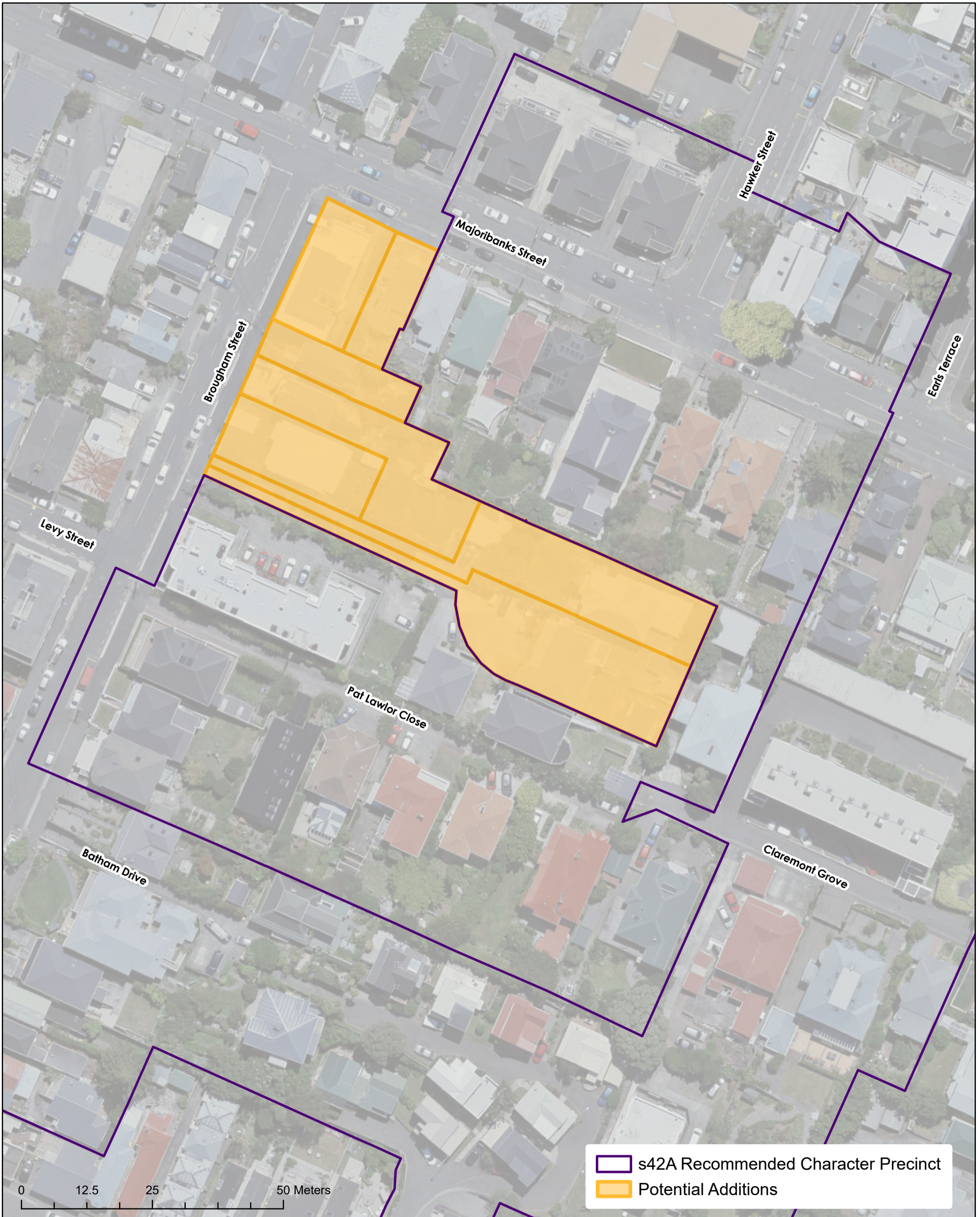
15 Brougham Street - Option 1 Removal

Date: 29/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



15 Brougham Street - Option 2 Additions

Date: 29/05/2023

Created by: City Insights GIS Team

Contact: District.Plan@wcc.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS, Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors