

## Phil Kelliher - Hearing 2 Submission 58 (11:20AM 4 April'23) – Evidence/References

**Request** a decision to be made to increase the protection of Mt Victoria's Pre-1930s Character Precincts to 76% rather than the 38% proposed in the District Plan - based on the outcome of the Boffa Miskell Pre-1930s Character Area Review expert report in 2019.

### **Background**

In Hearing 1 in addition to discussing the Boffa Miskell Review I focussed on the following areas:

- **Housing Capacity** – Over capacity in the inner-suburbs
- **Infrastructure** – Inadequate & lack of a concrete plan, allocated funding & timeframe to upgrade it.

In Hearing 2 I will again be discussing Boffa Miskell and evaluating the impact on capacity of the increase in Character Areas and showing how the loss of enabled dwellings can be accommodated as required under Section 77L (c) iii. In this regard I focused on the following areas;

- **Alternative Mt Victoria housing plan\*** – The alternative housing plan had a 2-pronged approach that would enable extensive development (Kent Tce Precinct) & retention of character/heritage (Character Zone – remainder of Mt Victoria) with continued development within it as it has had in the past.

*\*NOTE This includes a site-specific analysis & evaluation of an appropriate range of options as required under Section 77L (c) iii.*

*Relies on the officers' s.42A evaluation report for extending the character precincts from those identified in the PDP to those newly (ie once again) identified in the s.42A report.*

- **Public support for character/heritage** – There is widespread support from local residents and Wellingtonians generally,

On the following pages I have provided evidence & references to support my request.

## Boffa Miskell Character Area Review 2019 - Refer attached 1) Boffa Miskell Review, 23 Jan'19

1. **Pre-1930 Character Area Review ( Boffa Miskell) - Prepared for Wellington City Council, 23 January 2019** - Boffa Miskell on behalf of WCC, individually assessed in the field and classified every property as 'primary', 'contributory', 'neutral' & 'detracting' houses, and says that it makes sense to retain areas not only of the Primary houses but also of the Contributory, as they both together create that sense of character, refer table under.

<i>Character Contribution</i>	<i>Number/Percentage of Total Properties</i>		
	<i>Pre-1930</i>	<i>Post-1930</i>	<i>Total</i>
<i>Primary</i>	333 (32%)	8 (1%)	341 (33%)
<i>Contributory</i>	460 (44%)	17 (2%)	477 (46%)
<i>Neutral</i>	79 (8%)	63 (6%)	142 (14%)
<i>Detractive</i>	11 (1%)	60 (6%)	71 (7%)

**NOTE: 76% Mt Victoria pre-1930 properties are defined as either Primary or Contributory**

**Source: Boffa Miskell Pre-1930 Character Area Review 23 Jan'19 – Pg23**

Also Refer Appendix 4 Figure 8 - Indicative Character Contribution Sub-Areas: Mt Victoria

You can find the report using the link under:

<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>

2. **WCC Relied on the Boffa Miskell Report -**

The initial spatial plan proposed reducing character areas by about 2/3rds (what we eventually ended up with now) but following consultation officer made the recommendation that more areas should be added back in.

This is a key piece of evidence - the council themselves backed the idea of expanding the character areas, not just because people asked for it in their submissions , but based on a review of the evidence. **The Pre-1930 Character Area Review completed by Boffa Miskell Ltd (2019) was used as the basis for this further work**

“The approach is informed by a detailed site-by-site assessment of existing character areas. Some submitters raised concerns that it was not clear how the ‘sub-areas’ in the Draft Spatial Plan had been arrived at given the earlier Pre-1930 Character Area Review work. As a result, further work has been undertaken to review and re-test the criteria and methodology used to identify the sub-areas. The Pre-1930 Character Area Review completed by Boffa Miskell Ltd (2019) was used as the basis for this further work, in particular the ‘Indicative Sub Areas’ that were identified in that report.

Our review work, cross referenced with submissions, has resulted in some additional sites being recommended for inclusion in 'Character Precincts' because of their consistent character value. The changes being recommended to the Draft Spatial Plan's approach expand the partial extent of the character protection areas"

You can find this information in this Council Meeting agenda item on **page 74** (24 June'21):  
<https://wellington.govt.nz/your-council/meetings/committees/disestablished-committees/planning-and-environment-committee/2021/06/24>

# EVALUATION OF THE IMPACT IN CAPACITY OF THE INCREASE IN CHARACTER AREAS & MT VICTORIA

The Council's recent s42A report has recommended an extension of the Character Areas QFMs, refer table under:

ODP Area (ha)		307.2
PDP Area (ha)		85.4
s42A area (ha)		135.0
Boffa Miskell		233.5
% change ODP to s42A		-56%

Property Economics was engaged by WCC to assess the impact on capacity of the increase in Character Areas, Refer attached 2) WCC Capacity Modelling Character Areas & Kilbirnie HDRZ Memo, Feb23

It showed the impact the Character Area QFM on total Realisable capacity (in the absence of any other QFM) of an additional loss of **797 dwellings**, refer table under

PDP	-	685
s42A	-	1,482
Difference	-	797

Importantly the report concludes "... the additional Character Precincts do not materially decrease the level of capacity sufficiency. Compared to the previous QFM impacts table the required uptake of the with all QFMs scenario is still only 51% meaning capacity is almost double that of the expected demand for the next 30 years", pg 6

It would be reasonable then to expect as shown in the table under that the further loss an estimated 1,594 dwellings under the Boffa Miskell senario would also not materially decrease the level of capacity sufficiency ie 1,594 dwellingsrepresents just 2.6% of Realisable dwellings with all QFM.

Estrapulating this for an increase in the size of the Character Areas to 76% (under Boffa Miskell) for all character areas indicates a further loss of 1,594 dwellings.

		% of ODP	No. of Dwellings Lost	% of ODP Cumulative	No. of Dwellings Lost Cumulative
ODP Area (ha)	307.2				
PDP Area (ha)	85.4	28%	- 685	28%	- 685
s42A area (ha)	135.0	16%	- 797	44%	- 1,482
Boffa Miskell	233.5	32%	- 1,594	76%	- 3,076
Further loss of Dwellings			- 1,594		

\*Carrying out a similar exercise for Mt Victoria Character Area ie increasing the size of the Mt Victoria Character Area to 76% (under Boffa Miskell) indicates a further loss of 165 dwellings

Mt Victoria						
			% of ODP	No. of Dwellings Lost	% of ODP	No. of Dwellings Lost
					Cumulative	Cumulative
ODP Area (ha)	49.8					
PDP Area (ha)	18.2	37%	-	146	37%	146
s42A area (ha)	27.6	19%	-	151	55%	297
Boffa Miskell	37.8	21%	-	165	76%	462
Further loss of Dwellings			-	165		

\*NOTE: Pro-rata area & number of dwellings lost, **Refer attached 3) Capacity Assessment Workings Spreadsheet**

In the case of Mt Victoria, as is shown in the table below that further loss of 165 enabled dwellings due to the increased size of Character Area to 76% under Boffa Miskell can be easily accommodated, **refer under Option 1 - An alternative plan for Mt Victoria or alternatively Option 2 by enabling unlimited heights for buildings in the CBD**

Mt Victoria - Realisable Capacity under Boffa Miskell	
Further Loss of Dwellings	-165
<b>ADDITIONS</b>	
*Character Zone - Dwellings	200
Kent Terrace Precinct - Dwellings	247
Total	447
<b>Surplus Dwellings</b>	<b>282</b>

*NOTE Development is happening under the operative plan: at least 272 new builds in Mt Vic over the last 30 years, see under. There is no reason it can't continue at the same rate in the future. Conservative estimate used of 200 dwellings for the next 30 years*

Mt Victoria - New Builds 1990 - 2021 (272)					
APARTMENTS	195	TOWNHOUSES	73	HOUSES	4
Austin St (7)	8	Armour Ave (4)	6	Armour Ave (1)	1
Alpha Apartments	26	Austin St (83)	2	Armour Ave (3)	1
Hawker St (15)	6	Austin St (96)	5	Elizabeth St (104)	1
Home St (4)	6	Brougham St (88)	10	Porritt Ave (13A)	1
Ink'd	25	Elizabeth St (99&101)	3		
Kritza Apartments	60	Fallowfield (2-14)	7		
Victoria Villas	49	Fallowfield (12a,b&14a,b)	4		
Zavos Corner	7	Hawker St (44)	2		
Gerdondis Apartments	8	Majoribanks St (28&30)	8		
		Roxburgh St (15)	17		
		Roxburgh St (38A)	9		

**OPTION 1 - Alternative Mt Victoria housing plan\*** – The alternative housing plan had a 2-pronged approach that would far enable extensive development (Kent Tce Precinct) & retention of character/heritage (Character Zone – remainder of Mt Victoria) with continued development within it as it has had in the past. [Refer to the background on the following page and attached presentation and spreadsheet doc.](#)

**OPTION 2 – Enabling unlimited heights for buildings in the CBD Zone** – it is self-evident this would enable more than sufficient housing capacity for Boffa Miskell Character Areas to be extended to all inner-city suburbs.

## ALTERNATIVE MT VICTORIA HOUSING PLAN

**An alternative plan for Mt Victoria** - How to achieve a win-win for Mt Victoria and Wellington Public meeting 24 May 2021- [Refer attached 4\) An Alternative Housing Plan for Mt Victoria Presentation](#)

### Background

In December 2020 a group of residents from across Mt Victoria (comprising the Residents Association, the Historical Society and a range of concerned residents) came together to discuss their concerns.

The group decided that the best and the most responsible thing to do would be to prepare an alternative housing plan for Mt Victoria.

The group felt that an alternative housing plan could be developed that would provide higher density housing to accommodate the projected increase in population in Mt Victoria, while at the same time ensuring that heritage, character and the community were protected and enhanced.

The aim was to come up with a win/win solution that would better meet the needs of both Wellington and Mt Victoria.

Over 100 residents attended the Mt Victoria residents public meeting at Tararua Tramping Club hall where there was overwhelming support for the alternative housing plan presented.

**The alternative housing plan had a 2-pronged approach that would far enable extensive development (Kent Tce Precinct) & retention of character/heritage (Character Zone)**

### Alternative Mt Victoria plan - a two-pronged approach

**1. Character zone** (Brougham/Moir to Town Belt)  
Density 4,474/km<sup>2</sup> - 30 year growth + 200 dwellings (+ 400 residents)

**2. Kent Terrace Precinct** (Kent Terrace/Home/Hania)  
Density 745/km<sup>2</sup> – 30 year growth + 1,300 dwellings or 247 feasible dwellings(+ 2,500 residents)

[Refer attached 5\) Spreadsheet for the analysis of the new dwelling numbers in the Kent Terrace Precinct.](#)

# PUBLIC SUPPORT FOR CHARACTER & HERITAGE

## 1. **Live WELLington Survey – Refer attached 6) Live WELLington Media Release, dated 13 June'22**

*The LIVE WELLington Survey was conducted by Research New Zealand. The online opinion survey was completed with a random sample of 406 Wellington residents between 24 May and 5 June 2022. The survey has a margin of error of plus or minus 4.9%. Quotas were set so that roughly 50% of the sample were homeowners and 50% renters.*

Three-quarters of respondents said they did not support the draft District Plan's proposals to remove two-thirds or more of inner-city suburbs pre-1930s protection, preferring the loss of protection to be less extreme or for the status quo level of protection to remain.

## 2. **Mt Victoria Petition - Refer attached 7) NZ Herald story by Georgina Campbell dated 10 Dec'20**

A petition with signatures of 754 Mt Victoria residents (circa 17% of all residents & circa 50% of the petitioners are tenants, which mirrors approx. tenant/homeowner mix in Mt Vic) called on the Council to retain the pre-1930s demolition restriction rule for all of Mt Victoria was presented to Councillor Nicola Young by Mt Victoria Historical Society on Wednesday 28 Oct'21.

## 3. **Draft Wellington District Plan Public Consultation (Feb'22) – Refer link under**

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/wcc-dwdp-engagement-report-full-report-24-02-2022.pdf?la=en&hash=F14F65E57782DFBFD7F8548F92571AB746304815>

*The consultation analysis was prepared by Global Research Ltd for WCC*

“The bulk of submissions pertaining to Mt Victoria expressed concerns about building heights diminishing liveability for residents of existing dwellings due to lost sunlight, and negative impacts on the aesthetics and character of the area. There were a large proportion of submitters expressing concerns about loss of character.” Pg 32

## 4. Wellington City Spatial Plan (21 Dec'20) – Refer link under

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/draft-spatial-plan-feedback.pdf>

*The consultation analysis was prepared by Global Research Ltd for WCC*

### Key findings:

“- There was a preference for intensification to be carried out in areas that were close to transport routes, or in existing commercial centres – to ensure that these places were well connected and well serviced.”, Pg 6

“ - Character was the main feature respondents were afraid of losing as a result of change. Many people believed that Wellington’s character is what makes the city special, and felt the proposed changes in the Plan risk changing the character of the city forever” Pg 7

– Character was the main feature respondents were afraid of losing as a result of change. Many people believed that Wellington’s character is what makes the city special, and felt the proposed changes in the Plan risk changing the character of the city forever.

– In particular, respondents wanted to see the city’s iconic character homes protected in pockets across the city, especially in the inner suburbs, often placing value on the coherent character look they create as a collective rather than focusing on protecting individual houses.

– Respondents valued the fact that low-rise character housing allows access to sunlight and views, and do not create wind tunnels in the way that taller buildings do. Respondents wanted more case-by-case decisions on which areas could be developed, and how development can take place in particular places.” Pg7

### Agreement and disagreement with inner suburb proposals

Nearly three quarters (73%) of respondents agreed that there should be continued emphasis on streetscape character in areas outside proposed sub-areas through the retention of a general character area ensuring new development respects local streetscape and is well-designed – 40% strongly agreed and 33% agreed, Pg 157

Nearly half (48%) of respondents disagreed that the refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas – 33% strongly disagreed and 15% disagreed, Pg 154

*NOTE: 33% agreed & 15% were neutral.*

### Character & heritage is what makes Wellington Special (228 comments)

“Another extensive group of comments were received from respondents who urged WCC to protect Wellington’s character, as this is what makes Wellington, Wellington. Character areas, in particular the rows of character homes on Wellington’s hilly inner suburbs were frequently described as “iconic” and “uniquely Wellington”. In fact, over a quarter of comments in this group mentioned the word “iconic” in relation to Wellington’s character areas and buildings.



A substantial number of comments noted that Wellington’s identity is defined by its character homes and streets, or that these areas are what gives Wellington its “charm”. Several respondents pointed out that images of these areas, such as Mount Victoria, are frequently used to promote Wellington City, or that when people think of Wellington, images of these character streets come to mind. One such comment was:

*Loss of heritage and character is also a consideration - look at the photos the council itself chooses to use as the "poster child" for Wellington - how would that shot of MT Victoria look dotted with 6 story boxes.*

A considerable number of comments mentioned the role of Wellington’s iconic character areas in drawing tourists, both domestic and international, to the city. A small number of these comments noted that Wellington is unique in New Zealand for its well-preserved Victorian and Edwardian homes, which should be seen as a valuable tourism asset and protected accordingly.

Overall, comments from this group of respondents felt that Wellington is a city defined by its character areas, and that to lose these treasured buildings would be to lose part of the city’s identity.” Pg 51

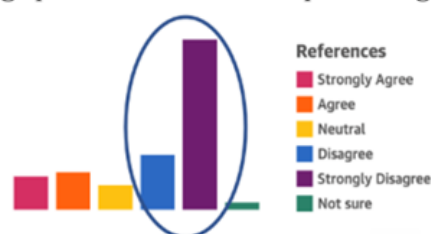
## 5. Wellington City Spatial Plan (21 Dec’20) – Refer attached 4) An Alternative Housing Plan for Mt Victoria Presentation

### Mt Victoria

There were 301 DSP submissions received from people showing a Mt Vic address. That was more than 10% of the total submissions received.

Two-thirds of Mt Victoria submitters disagreed with the spatial plan proposals. Just over half strongly disagreed.

69% disagreed that the approach to the 1930s character areas was a ‘good balance’ between protecting special character and providing new housing



# Dropbox Attachments

- 1) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\1) Pre-1930 Character Area Review ( Boffa Miskell) - Prepared for Wellington City Council, 23 January 2019.pdf"
- 2) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\2) appendix-5-to-part-4---property-economics-assessment-of-extra-character-areas, Feb23.pdf"
- 3) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\3) EVALUATION OF THE IMPACT IN CAPACITY OF THE INCREASE IN CHARACTER AREAS ^0 MT VICTORIA^J 110323.xlsx"
- 4) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\4) Public meeting powerpoint RELEASE, June'22.pptx"
- 5) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\5) Kent Tce Precinct - Analysis for Increased Density 6 Feb'21.xlsx"
- 6) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\6) MEDIA RELEASE Wellingtonians support retention of more character areas - survey June 2022.pdf"
- 7) "C:\Users\Phil\Dropbox\1 A - DSP Hearing 2 - Phil Kelliher Attachments\7) 800 residents sign petition to save Wellington^J Herald 111220.docx"