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Submitter Statement by Historic Places Wellington

Stream 4 – 5 July 2023

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1.0 Summary of key points

This submission focuses on specific areas of old wooden houses in Thorndon, The Terrace and Salamanca Road, Mount Victoria and Newtown which are proposed to be incorporated into the Centre Zones. HPW considers these areas have significant heritage value and should continue to a zoned residential within heritage and/or character precincts.

1.1

Thorndon CCZ

1.11

HPW seeks that two small Thorndon enclaves of old residential wooden houses remain zoned residential and not be incorporated into City Centre Zone (CCZ).

These areas are:

- Selwyn Tce and
- Portland Cres/Hawkestone St

1.12

HPW draws attention to the Boffa Miskell assessment of character and the evidence that there is a high degree of consistent character in each area.

The areas are currently zoned residential and form part of the Thorndon Character Area.

1.13

The Council's s42A report did not include these areas in recommended character precincts. In Stream 2, HPW proposed they be established as character areas. HPW says that qualifying matters under s.77 RMA exist in respect of the areas.

1.14

In its right of reply from Mr Lewandowski the reporting officer noted the two areas are:

Selwyn Tce (page 35)

"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 Cres/Hawkestone St

“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.”

1.15

HPW rejects the evidence that “being separate” from other areas of character precinct is a sufficient basis to decline to accept a qualifying matter exists based on the consistent character of the enclaves. The residential areas have had a long-established character recognised in the operative district plan and are worthy of protection on a site-by-site evidential basis. The houses in these areas are of exceptional quality and design.

1.16

Stream 3: Heritage Areas

In Stream 3, HPW proposed that in the alternative those two areas be recognised as heritage areas, also under s77. HPW presented evidence from earlier Council assessments and Council recommendations that the heritage values of the areas be recognised in two small heritage areas.

2.0

The Terrace & Salamanca Rd

2.1

Similarly, HPW calls for this residential area (currently protected by the character area rules of the operative district plan) to be excluded from CCZ and for it to be established as a character precinct.

2.2

In the alternative, HPW has proposed the area be established as a heritage area, acknowledging there are 10 heritage listed sites within the area and the non-listed buildings are of high quality and consistent character.

2.3 The right of reply from Mr Lewandowski says:

“160

Submitters have sought either the retention of the existing ODP character area or specific properties within it [see Appendix 12 and Figure 39].

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.”

2.4

HPW refutes that evidence and says the character of the area is not “too variable”. The “detractive” sites have considerable character of themselves, albeit of a non pre-1930 nature.

2.5

Furthermore the “methodology” did not contain a robust evidential basis for excluding areas merely because of their proximity to the CCZ. Being near and therefore more likely at risk should rather be a reason for preferring that their character status be protected by being included in the precincts.

2.6

This particular area is of outstanding character, unique to Wellington and with an outstanding history and heritage value based on the architectural grandeur unmatched elsewhere in the city of these residences of notable people.

3.0

Mt Victoria: Lipman/Levy Sts

3.1

Similarly, HPW calls for the Lipman and Levy Sts to be included in character precincts, or in the alternative to be accorded heritage area status. The area of large historic town-houses on the edge of the CCZ form a prominent character streetscape for those accessing Mt Victoria with high traffic and movement flow.

3.2

Mr Lewandowski's right of reply says:

"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."

3.3

HPW says the "methodology" is flawed when it rejects areas of important primary character assessment from being included in a character precinct on the basis that it is a "small area" or only on one side of the street.

4.0

Newtown

4.1

HPW supports the existing heritage area in the Newtown shopping area. It's an important, virtually intact, Edwardian cityscape of considerable (national) heritage value. HPW notes the proposal to increase the height limit applicable in the heritage area but supports Heritage New Zealand views in that regard. HPW sees value in aggregating heights around and near the shopping centre, and away from the nearby residential area. That would involve adaptively re-using the heritage shops by stepping development up and away from Riddiford St itself, while enabling more density to be located at the rear of the shops. It will be important for the integrity of the heritage area for significant portions of the shops to be retained (ie not facadism). In that regard, HPW generally supports the proposal by Urban Activation/Red Design.

4.2

As regards the application of Policy 3 NPSUD, HPW notes that although Newtown has considerable medical employment opportunities, the hospital is largely self-contained and the "services" of Newtown are in fact little used by its employees. Newtown is a commuter and transport destination but density "commensurate with its services" is not as justified as some argue. It's retail, hospitality and amenity "services" are largely used by a much smaller

population (ie its residents). (The NPSUD test is commensurate with its “services”, not with its “employment opportunities”).

4.3

HPW is also concerned about the potential for wind effects from taller buildings in Newtown to negatively impact the surrounding heritage area and to create negative amenity effects for residents of the area. HPW proposes mandatory wind testing at 4 storeys and above for developments in all residential neighbourhoods.

5.0 Emmett/Green Sts & Normanby/Donald McLean Sts

5.1

HPW has proposed in Stream 2 that Emmett and Green Sts, and Normanby and Donald McLean Sts be included in the character precincts.

5.2

Mr Lewandowski’s right of reply says:

“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.”

[He goes on in respect of Normanby, Donald McLean etc]:

“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. ...I do not support the inclusion of this area.”

5.3

HPW refutes that evidence and says that the character of the areas is sufficient to extend the nearby character precincts or to extend the heritage area to incorporate those streets. Again, a small “finger” of character should not disqualify the area if it’s character is otherwise considerable.

5.4

In stream 3, HPW proposed the above Newtown streets be established as heritage areas. The heritage of the streets has been recorded in the evidence of Mr Michael Kelly, which HPW fully supports.

5.5

Furthermore, the historic importance of Emmett and Green Streets to the Irish and Catholic communities is of national significance.

5.6

Character and heritage must be taken account of in determining the appropriate heights for the Newtown centre.