

Memorandum

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Company: Wellington City Council

Date: 2 March 2022

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Message Ref: Wellington City Council Review of Residential Coastal Edge

Project No: BM220008

Executive Summary

The Residential Coastal Edge was identified to protect the residential area comprising the linear configuration of dwellings along the coastal edge, where the coastal escarpment is the backdrop, in ten identified areas within Wellington City.

The area was viewed to be under threat from multi-unit development which had the potential to creep up the escarpment face, creating visually prominent dwellings, and adversely modifying the coastal escarpment, which provides these areas with both a clearly defined backdrop and a sense of place.

While the reasons for providing protection to the area are still valid, the level of analysis that was undertaken in 2008 to determine the character area was not at a 'site-specific' scale and therefore is not sufficient to meet the requirements of being considered a qualifying matter under the NPS-UD or Housing Supply legislation. To exempt the Residential Coastal Edge area from these intensification policies, a site-specific analysis would be required.

Overall, intensification (e.g. following the national Medium Density Residential Standards) is likely to result in some levels of effect within the existing residential character. However, it is expected that an increase of the intensification along the coastal edge, which mainly will affect attributes like height, typology, age and built form is likely only to result in a limited effect on the fundamental values that are the basis of the Residential Coastal Edge.

The Earthworks provisions within the Draft District Plan will provide Council with a level of discretion in relation to the coastal escarpment. There are also controls on the density of development for the areas of the Residential Coastal Edge located within the Medium and High Coastal Hazard Areas. Additionally, any areas identified as SNAs will also have protection.

Vegetation removal within the Coastal Environment is allowed outside identified areas of high or very high natural character, therefore intensification will potentially result in the loss of escarpment vegetation. Some discretion is provided for in the Earthworks provisions where new landscaping and associated planting should conceal or soften the appearance of earthworks and associated structures. Unnatural scar faces are discouraged and untreated cut faces are favoured over artificial finishes which will maintain some characteristics of the escarpment (rocky exposed faces).

With the Draft Plan provision in place, fundamental character attributes, such as street width and adjacency to the coast, are unlikely to be adversely affected by a change in residential intensification. The Council will have some discretion over earthworks in relation to the coastal escarpment, which include landscape and visual matters.

Introduction

Boffa Miskell have been engaged by Wellington City Council to undertake a review of the work carried out to define the Residential Coastal Edge as part of Plan Change 72 (DP 72), including the s32 analysis, Officers Report, and Decision Report, and to assess whether the evidence and reasons for providing special protection for the Residential Coastal Edge through DP 72 remain valid and robust today.

This review also considers the subsequent work that has been completed since the Residential Coastal Edge that has resulted in various overlays and provisions in the Draft District Plan that may obviate the need for the Residential Coastal Edge provisions, in whole or in part.

Background

District Plan Change 72, the Residential Area Review, was notified in September 2009, and adopted by Council in April 2010. At the time, the plan change sought to build on those aspects of the Operative District Plan that had resulted in improvements in the quality and amenity Wellington's residential area and to identify areas for potential intensification.

With regard to intensification, the decision report of April 2010 also stated that:

Intensification of residential activity within the current residential areas is crucial to maintaining the compact urban form and character that serves Wellington so well. But the character of the city is also of critical importance to Wellington's liveability and ultimately to its economic success. Low quality poorly planned and executed development has had undeniably adverse effects and provoked resistance from neighbours, community organisations and professional groups. The Council has responded with policies and plan changes to manage growth by encouraging less ad hoc development, which was damaging streetscape, the setting of the city and ultimately Wellington's sense of place.

Accordingly, among the key changes proposed by DP72 was the provision of a new Character Area that recognises the unique character and importance of Wellington's Residential Coastal Edge. The Decision Report states that the 'special character' of the Residential Coastal Edge "derives from the relationship between the openness of the coast, the coastal road, the houses and the vegetated escarpment behind." The Residential Coastal Edge evolved out of a citywide character study commissioned in 2007 (Wellington City Urban Character Assessment, Boffa Miskell, 2007) to identify residential areas of the city that had unique character and were sensitive to change.

A report prepared by Boffa Miskell for Wellington City Council in 2008, Wellington Coastal Edge Residential Review (September 2008), formed the background to support DP72. The purpose of the study was to gain a better understanding of the special character of the residential coastal edge of the City, what threats there are to that character, and whether any different District Plan provisions were required in order to ensure that character is managed in the future. The report makes the following summary observations in reference to character attributes of the area, and threats to this character:

Character Attributes

The physical character of the area is characterised by the following fundamental attributes:

- a strongly defined building edge to the road through minimal setbacks and small separation distances between buildings
- a linear pattern of development which follows and emphasises the sinuous coastal edge
- 'active' building frontages expressed by front doors, windows and decks to living spaces that provide visual close interaction between residents and street 'public life'
- consistently narrow frontages and low scale (less than three storey) buildings close to the street (many older and some with eclectic detailing) that provides a human scale and interest
- a few groupings of buildings of consistent styles, but generally wide variations in age, style, materials, and the strong landscape element of the vegetated escarpments which rise above the ribbon of development along the road and are often appreciated more from a distance at headlands, or across a bay.

Threats To Character

The following potential or actual threats to the existing character were identified:

- buildings in, or on, the escarpment reducing its intactness, continuity, openness and visual strength
- large scale earthworks and the use of retaining structures such as shotcrete which extend up behind buildings increasing the 'zone of influence' on the 'naturalness' of the escarpment and preventing any revegetation in the future
- multi-unit development which is inconsistent with the pattern of narrow site by- site development where it reduces the variation and visual interest of the frontage
- new developments with 'non-active' street frontages which reduce the interplay between residents and 'public life' which occurs along the road
- new developments which lack street edge definition and so break the line which reinforces the coastal edge.

Overview of current context

In July 2020, the Government released the National Policy Statement on Urban Development (NPS-UD). The NPS-UD introduces housing bottom lines for tier 1 and 2 urban environments as well as high and medium density residential zones and building heights of at least six stories in metropolitan centre zones.

On 19th October 2021, the Government announced it will introduce legislation to increase housing supply in New Zealand's five largest urban areas – Auckland, and greater Hamilton, Tauranga, Wellington and Christchurch. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill amends the Resource Management Act 1991 to rapidly accelerate the supply of housing where the demand for housing is high.

The Bill introduces a new planning process to support Tier 1 councils to implement the NPS-UD's intensification policies quickly. The Bill proposes a new planning process to support councils to implement the intensification policies in the NPS-UD. This will be called the Intensification Streamlined Planning Process (ISPP).

The Bill proposes Tier 1 councils will be required to apply medium density residential standards (MDRS) from August 2022.

These new standards will allow people to develop up to three homes of up to three storeys on most sites without the need for a resource consent. Exemptions will apply based on qualifying matters set out in the NPS-UD, such as heritage areas and natural hazards. The ISPP will also be used to implement the MDRS by the required councils/urban areas.

Accordingly, an outcome of this review will be to determine whether there is sufficient justification based on existing information to support continued application of the Residential Coastal Edge as a qualifying matter.

Operative District Plan

Objectives within the Operative District Plan in relation to the Residential Coastal Edge (Objective 6.3) are to:

- 1) Maintain and enhance the relationship between the built and natural environment in particular the relationship between the escarpment, the buildings, the road and the coast.
- (2) To reinforce the character of the street frontage by encouraging active building frontages, fine grain and a defined building edge.
- (3) Encourage the retention of vegetation on the escarpment.
- (4) Discourage new buildings and structures on prominent escarpment faces.

Only one policy in the Operative District Plan specifically relates to the Residential Coastal Edge, policy 4.2.2.2 which is to:

"Ensure that development within the Residential Coastal Edge recognises and responds to the unique character of the coastal edge."

The method in relation to this policy notes that

"In particular the Plan discourages activities that can threaten the intactness of the escarpment. This includes development that creeps up or down the escarpment, removal of vegetation, tall or bulky buildings

that may obscure views of the escarpment and visual intrusion from access ways and buildings at the top of the escarpment. Retaining structures and exposed shot-crete slopes can also exacerbate the visual effects of development on the escarpment”

Specific controls that are in place to manage this are:

- Development on the slopes of the escarpment above the 13 metre contour may be appropriate if it can be demonstrated that the proposal will not detract from the visual qualities of the escarpment
- Controls are also placed on the erection of solid fences above the 13 metre contour
- Specific rules to maintain the strongly defined, fine grained active building edge that lines the coastal road. In particular, wide vehicle access to the sites and solid front fences over 1.2 metres in height will be discouraged as these would be disruptive elements, detrimental to the current townscape character

Draft District Plan

GRZ-PRE-01 relates to the Residential Coastal Edge Precinct.

It states “The Residential Coastal Edge Precinct contributes to Wellington City’s sense of place and provides an important visual amenity for local residents and the public generally. The vegetated coastal escarpments give the Precinct a visual prominence and intensity that makes it more sensitive to change than a typical suburban townscape. Additional building and structure controls apply in the Precinct to protect its unique qualities from inappropriate or unsympathetic development. There is also specific design guidance for the Precinct in the Residential Design Guide.”

Objective GRZ-PREC01-O1 relates to the Residential Coastal Edge and requires that “The unique qualities of the Residential Coastal Edge Precinct are maintained or enhanced.”

Policy GRZ-PREC01-P1 is the only policy which relates specifically to the Residential Coastal Edge Precinct. It covers the following:

Sympathetic development in the Residential Coastal Edge Precinct

Ensure that new development maintains or enhances the visual character of the coastal escarpment having regard to whether it:

1. Is visually unobtrusive;
2. Compatible with existing development patterns;
3. Reduces the visual amenity or threatens the intactness of the escarpment; and
4. Avoids visual intrusion from retaining structures, fences and walls that can negatively impact on the continuous visual character of the escarpment.

Comment:

The Residential Coastal Edge Precinct was identified to protect the residential area comprising the linear array of dwellings along the coastal edge, which have the coastal escarpment as backdrop, in ten identified areas within Wellington City.

This area was considered to be under threat from multi-unit development which had the potential to creep up the escarpment face, creating visually prominent dwellings, and destroying the coastal escarpment which provides these areas with a sense of place. Subsequent policy developed for this area under Plan Change 72 in the Operative District Plan, and Policy GRZ-PRE-01 in the Draft District Plan primarily aims to maintain the integrity of this escarpment and avoid visual intrusion from fences, walls and other ancillary development which has the potential to undermine the intactness of the escarpment, and thus the visual amenity of the area.

Review of subsequent material

Since the adoption of the Residential Coastal Edge in 2010 there have been several other changes to the Operative District Plan and the Draft District Plan which also serve provide varying forms of protection to the components which make up the Residential Coastal Edge.

This includes:

- Identification of the inland extent of the Coastal Environment, and areas of High or Outstanding Natural Character within, as required by the New Zealand Coastal Policy Statement (NZCPS)
- Identification of Outstanding Natural Features and Landscapes (ONFs or ONLs) and Special Amenity Landscapes (SAL) as required by the Wellington Regional Policy Statement (RPS)
- Refinement of Coastal Hazard areas by Greater Wellington Regional Council

An overview of these provisions and how they relate to the RCE is outlined below.

Other provisions which may also provide the RCE with protection were also reviewed, including

- Ridgelines and Hilltops overlay
- Significant Natural Areas
- Coastal Hazards
- Notable Trees
- Historic Buildings
- Earthworks

Coastal Environment

The entirety of the Residential Coastal Edge falls within the Coastal Environment, as illustrated in the attached maps. Policies for the Coastal Environment primarily relate to areas of high or very high natural character areas, Outstanding Natural Features and Landscapes and Significant Natural Areas. These areas lie outside the Residential Coastal Edge (see map set), with the exception of some SNA areas which lie within the area.

Residential development in those areas of the Coastal Environment already zoned Residential is anticipated to avoid urban sprawl along the parts of undeveloped coastline. Policy CE-P1 relates to Use and Development in the Coastal Environment and states that it must:

Provide for use and development in the landward extent of the coastal environment where it:

1. Consolidates existing urban areas; and
2. Does not establish new urban sprawl along the coastline

Vegetation removal is allowed in the Coastal Environment outside areas of High or very high coastal natural character. Policy CE-P7 - Vegetation removal in the coastal environment states that:

Manage the removal of vegetation in the coastal environment as follows:

1. Allow for the removal of vegetation in the coastal environment outside of areas of very high or high coastal natural character.
2. Allow for the removal of exotic vegetation in the coastal environment within areas of very high or high coastal natural character.
3. Only allow for the removal of indigenous vegetation in the coastal environment within areas of very high or high coastal natural character that:
 - a. Is of a scale that maintains the identified values; or
 - b. Is associated with ongoing maintenance of existing public accessways.

Earthworks

The Earthworks provisions within the Draft District Plan will provide the greatest level of discretion for the key natural characteristics of the Residential Coastal Edge. Outside areas of high or very high natural character, Outstanding Natural Features and Landscapes and Special Amenity Landscapes there are no specific rules in relation to earthworks in the Coastal Environment.

However, earthworks cut or fill within all zones of the Draft Plan which are retained by a building or structure¹ have a maximum cut height of 2.5m. Intensification within the Residential Coastal Edge is likely to exceed this where development occurs in areas outside the coastal platform, due to the requirement for cutting into or retaining the steeply sloping coastal escarpment.

Earthworks Effects Standards EW-S2-Cut Height and fill depth- which are applicable to All Zones provide measures to reduce the visual prominence and visual intrusiveness of earthworks and structures, and includes the following assessment criteria under point 9:

9. The need for, and effectiveness of, measures to reduce the visual prominence and particularly visual intrusiveness of the earthworks, and any buildings and other structures associated with or subsequently located on them, including:
 - a. Designing and engineering to reflect natural landforms and natural features such as cliffs, escarpments, streams and wetlands;
 - b. Avoiding unnatural scar faces;
 - c. Favouring untreated cut faces over artificial finishes in areas where bare rock is common;
 - d. Favouring alternatives to the use of sprayed concrete on cut faces, such as anchored netting;
 - e. Designing and finishing retaining walls or stabilising structures to reflect existing buildings and structures, in urban settings;
 - f. Designing and finishing retaining walls or stabilising structures to reduce their apparent size by, for example, employing features that break up the surface area and create patterns of light and shadow;
 - g. Retaining existing vegetation above, below and at the sides of earthworks and associated structures;
 - h. Integrating new landscaping and associated planting to conceal or soften the appearance of earthworks and associated structures;
 - i. Concealing views of earthworks and associated structures from streets, other public places and other properties through the positioning of proposed or future buildings; and
 - j. Placing pipes below ground or integrating them into earthworks and associated structures.

EW-S3 – Existing Slope Angle states that earthworks must not be undertaken on an existing slope angle of 34° or greater. However, earthworks are allowed on slopes of 34° or greater where these will be retained by a building or structure. In this case the same matters relating to landscape, vegetation and visual amenity apply as outlined in point 9 above.

Coastal Hazards

Wellington City's coastal environment is susceptible to a range of coastal hazards, which are mapped as Coastal Hazard Overlays, and illustrated on the attached map set. These include:

- Tsunami;
- Coastal erosion; and
- Coastal inundation.

Draft District Plan Coastal Hazards Objective CE- O5 is that Subdivision, use and development in the Coastal Hazard Overlays reduces the risk to people, property, and infrastructure.

The Coastal Hazards overlay covers the area of the foreshore and some parts of the Residential Coastal Edge which are closest to the foreshore/road reserve. Much of this is identified as being of medium or high coastal hazard, see the attached area maps.

Policy CEP-15 covers Residential Units in the Low Coastal Hazard Area and Medium Coastal Hazard Area and that it must provide for up to three residential units on a site within the Low Coastal Hazard Area and one unit in the Medium Coastal Hazard Area.

Policy CE-P17 covers Hazard-Sensitive Activities (which is defined in the Plan to include, amongst other activities, any residential activity) and Potentially-Hazard-Sensitive Activities in the High Coastal Hazard Areas. The policy states that that these activities should be avoided unless it can be proven that there is a

¹ The definition of structure in the Draft Plan has that same meaning as in Section 2 of the RMA "any building equipment, device, or other facility, made by people and which is fixed to land; and includes any raft."

functional need to locate there, the development demonstrates measures that reduce or not increase the risk to people, property, and infrastructure; and people can evacuate safely during a coastal hazard event.

Natural Character

Specific Objectives and Policies within the Draft Plan are outlined for areas identified as having high or very high natural character. There is no overlap between the Residential Coastal Edge and any areas of Identified High or Very High natural character, so these objectives and policies will not apply.

Outstanding Natural Features and Landscapes (ONFs or ONLs) and Special Amenity Landscapes (SALs)

Outstanding Natural Features and Landscapes (ONFs or ONLs) and Special Amenity Landscapes (SALs) were identified by the Wellington City Landscape Evaluation and Schedule 11 and 12 in the Draft District Plan as required under Policy 25 Wellington Regional Policy Statement. These areas in relation to the Residential Coastal Edge are illustrated on the attached map set. There is no overlap between any ONF, ONL or SAL areas with the Residential Coastal Edge, so the policies and rules in relation to these areas will not apply.

Ridgelines and Hilltops Overlay

Ridgelines and Hilltops of Importance to Wellington City were identified in Plan Change 33. These areas in relation to the Residential Coastal Edge are illustrated on the attached map set. There is no overlap between any identified Ridgelines and Hilltops areas with the Residential Coastal Edge, so the policies and rules in relation to these areas will not apply.

Significant Natural Areas, Notable Trees, Historic Buildings

Some areas of the Residential Coastal Edge also have overlap with Significant Natural Areas (SNAs), Notable Trees and Historic Buildings. The provisions relating to these areas will still apply, and their locations in relation to the Residential Coastal Edge are illustrated on the attached map set.

Comment:

Earthworks provisions will allow the Council discretion over earthworks in relation to the existing escarpment landform. Vegetation removal is allowed outside identified areas of high or very high natural character. Intensification will potentially result in the loss of escarpment vegetation. Some discretion is provided for in the Earthworks provisions where new landscaping and associated planting should conceal or soften the appearance of earthworks and associated structures. Unnatural scar faces are discouraged, and untreated cut faces are favoured over artificial finishes which will maintain some characteristics of the escarpment (rocky exposed faces).

Areas identified as Significant Natural Areas will be protected by the policies in relation to these. Sites located within the Medium Coastal Hazard Area can provide for up to one residential unit. Residential development is discouraged within High Coastal Hazard areas.

Assessment of Residential Coastal Edge

The purpose of the 2008 Coastal Edge Residential Review was to gain a better understanding of the special character of the residential coastal edge of the City, what the fundamental attributes are that contribute to the coastal edge character, what threats there are to that character, and whether any different District Plan provisions were required to ensure that character is managed in the future.

To determine if this review is still valid and robust today, the following has been assessed on the basis of:

- Do the character elements that were considered in the 2008 review still sufficiently capture the current local character or would an update to the review be required; and
- Are the identified threats to the character still valid and to what extent would national Medium Density Residential Standards effect the existing character.

The review describes the general residential character of each of the ten identified coastal areas with a detailed character analysis of selected sites in four of the areas.

The character attributes that were considered are:

- Building height
- Lot size, shape and density,
- Relationship of dwellings to road,
- Residential age, type and style
- Building condition and originality,
- Vehicle parking
- Coastal escarpment
- Platform and coastal edge

The collection of attributes that are used in the following table are commonly considered attributes that make up local character. This table compares these attributes with the elements that were considered in the 2008 Coastal Edge Residential Review.

| Natural attributes | Considered in review / PC72 support | Still relevant / needs update | Commentary | Effect of potential intensification |
|---------------------------|--|--------------------------------------|---|--|
| Topography | Covered in 'Coastal escarpment' and 'Platform and coastal edge' | Relevant | Assumed that limited change has happened to the topographical attributes that contribute to the character of the coastal edge. The escarpment is considered to be a fundamental contributor to the character of the area. | Future intensification has the potential to affect the escarpment. As some level of earthworks (and associated planning consent) would likely be required, there is sufficient level of protection against substantial modifications of the escarpment. |
| Public open space | Partly covered in section 'Platform and Coastal edge' | Needs update | Public open spaces contribute to the sense of place and a change in the use or design over time can potentially have an effect on the character of the adjoining residential areas. The effects of public open space on the character of the residential coastal edge were not assessed in the 2008 Coastal Edge Residential Review. | Assumed that the provision of public open space along the coastal edge remains the same and residential intensification will not have a substantial effect on the contribution of open space to the character of the coastal edge. |
| Vegetation cover | Partly covered in 'Coastal Escarpment' and 'Platform and Coastal edge' | Needs update | There is a strong focus on the effects that the vegetated escarpments have on the character of the areas. Considering the location and scale of this vegetation, this affects the character of the area at a wider scale and is mostly visible from a distance. Onsite vegetation and other vegetation within the Platform and Coastal Edge was covered in the review to a limited extent. As this vegetation affects the character of the area at a streetscape scale, the effects of this on the character of the coastal edge require an assessment at a more detailed scale (e.g. site specific). Also, the effects that vegetation has on local character can change over time and depends on the level of protection that is in place for these specific areas (e.g. protected tree groups). | There is a risk that any current contribution of onsite vegetation to the character of the area can change if the residential areas are intensified. To what extent onsite vegetation contributes to the character will need to be assessed. Areas identified by the draft plan as SNAs will be protected by the provision in relation to these. |
| Street trees | Partly covered in 'Platform and Coastal Edge' | Needs update | Similar to section above. The presence of street trees can have a local effect on the character of the area (e.g. Karaka Bay) and was only covered in the review at an area-wide scale. This effect can change over | The contribution of the street trees to the local street character will likely remain unchanged if adjacent |

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|---|---------------------------------------|-------------------|--|---|
| | | | time and the level of contribution of street trees to the character would benefit from a more site specific / streetscape analysis. | residential areas are intensified. |
| Notable trees | Not covered | Needs update | Similar to sections above (vegetation and street trees) | Similar to street trees. |
| Waterbodies / watercourses | Not covered | Needs update | Apart from the coastal nature of the area and the adjacency to the Wellington Harbour and south coast, there is no assessment of the effects that the presence of other watercourses (e.g. streams) have on the residential coastal character. | The contribution that any water bodies make to the character of the area is unlikely to change as a result of intensification. |
| Significant Natural Areas | Not covered | No need to update | Assumed that these are covered by other documents | The contribution of SNAs to the character of the area is unlikely to change, with the Draft Plan providing policy in relation to these. |
| Significant Landscape / Landforms | Partly covered in 'Natural Character' | No need to update | Assumed that these are unchanged – and covered by other documents. However, can benefit from a site specific assessment that assesses local character (as opposed to area-wide) | The contribution of significant landscapes and forms to the character of the area is unlikely to change, as these lie outside the area of the residential Coastal Edge, and have specific provisions in the draft plan to protect them. |
| Sites of significance to Māori and archaeological sites | Not covered | Needs update | Would require additional assessment to assess its relevance to the coastal residential character. | Any potential contribution of sites of significance to the character of the area is unlikely to change, provided a suitable level of protection of these remains in place. |

| Built character | Considered in review / PC72 support | Still relevant / needs update | Commentary | Effect of potential intensification |
|------------------------------------|--|--------------------------------------|--|--|
| Land use | Not specifically covered, but non-residential uses are mentioned | Needs update | Mixed-use developments have the potential to result in a notable change in character. The threats of potential land uses other than residential were not specifically considered in the review and it is expected that some level of non-residential use can be developed without adversely affecting the character provided that the built form does not have a detrimental effect on the character attributes that define the area. However, the level of effect can differ depending on the coastal area and so should be considered on an area-specific basis. | It is assumed that Council will retain a level of discretion over land use and the potential development of mixed-use within the residential zone and the risk to a change land use within the zone as a result of intensification is minimal. |
| Street network | Not covered | No need to update | The street network predominantly consists of one road that follows the coastal edge, is a defining feature of the character of the residential coastal edge. | Rear lot development can potentially result in an increase of driveways or internal roads, however the contribution of the existing street network to the character of the area is unlikely to change as a result of intensification. |
| Public transport and cycle network | Not covered | No need to update | The coastal edge is a popular cycling route. The provision of cycling infrastructure can affect the character of an area, however, this effect is unlikely to be substantial. | No or almost no effect on the character of the coastal edge. An increase in cycling provision can potentially reinforce the character of the coastal edge. |

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| Street pattern | Not covered | No need to update | The curvilinear street network, predominantly following the coastal edge, is a defining feature of the character of the residential coastal edge. | It is assumed there is limited risk of change to this pattern in the future. |
| Formed street width | Not covered | Needs update | Street width has a substantial effect on the perceived character of an area as they contribute to the level of intimacy of the street scape. The effect of the street width was not covered in the 2008 Coastal Edge Residential Review, and it is assumed that the street widths are relatively unchanged since the review. | There is no immediate risk to the effect that the (intimate) street width has on the character of some parts of the coastal edge. However, there is a potential for the pressure on the current streets to increase if surrounding residential areas become more intensive in the long term, requiring a possible rethink of street allocation, use and width in the future. |
| Lot size | Covered in 'Lot size, shape and density' | Needs update | The effect that any potential changes to the subdivision pattern may have had on the character of the coastal edge will need to be reassessed. | Subdivision will inevitably create smaller lot size, however, this threat predominantly manifests itself through an increase in building mass and the number of access/driveways visible from the street. |
| Building age | Covered in 'Residential age, type and style' | Needs update | In Karaka Bay and Island Bay, the character of the area is partly defined by groupings of buildings of a similar age, style and form. To assess the level of change that has occurred, and if these attributes still form a substantial contribution to the coastal edge character of the area, a more site-specific analysis is required. | It is noted that the residential coastal edge already consists of a mix of building ages and that the building age is not a defining element of the residential coastal edge. Therefore, the contribution of building age on the character of the area is unlikely to change as a result of intensification |
| Building type | Covered in 'Residential age, type and style' | Needs update | Similar to building age, a refresh of the assessment would be required to assess the level of which the building typologies still contribute to the character of each of the areas. These have generally been covered by the review, however it is unclear if a change to these typologies would substantially alter the coastal edge character. | Similar to building age, it is noted that the residential coastal edge already consists of a mix of building types and that the building type is not a defining element of the residential coastal edge. Therefore, the contribution of different typologies on the character of the area is unlikely to change as a result of intensification |
| Building location | Covered in 'Lot size, shape and density' and 'Relationship of dwellings to street' | Needs update | It can be assumed that any recent developments on street-facing sites have been built to the street edge in accordance with the Design Guide. Some level of infill development may have occurred since the 2008 Coastal Edge Residential Review. A more detailed study would be required to identify the extent of any change and the effect this may have had on the character of the area, predominantly related to the linear nature of the built environment and the any potential encroachment of the escarpment. | The effect of intensification on the contribution that the building location has on the character of the area depends on the potential of the development to affect the predominant linear nature of the built edge. If developers are encouraged to be built towards the street edge, the anticipated effect is likely to be minimal, regardless of the footprint or number of units on the site. |
| Building height | Covered in 'Building height' | Needs update | Similar to building age and type, a refresh of the assessment would be required to assess the level of which | Several three storey developments or other buildings of a comparable |

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| | | | the current building heights still contribute to the character of each of the areas. | height along the coastal edge currently exist and appear not to substantially detract from the streetscape character or views of the escarpment. It is likely that enabling three storey development along the coastal edge will change the residential character, however, it is not expected to substantially affect the fundamental attributes that were identified in the 2008 Coastal Edge Residential Review |
| Site coverage | Covered in 'Lot size, shape and density' | Needs update | The character of the coastal edge is described as predominantly development along the street edge with undeveloped open space at the rear. This generally results in low perceived site coverages and contributes to the linear character of the edge with the escarpment at the rear of properties relatively undisturbed. | As long as developments are built along the street edge, an increase in permitted site coverage (or infill development) is unlikely to substantially affect the linear nature of the coastal edge development. Enabling a higher site coverage can result in rear lot development with associated driveways to rear lots having the potential to affect the street character. Enabling a higher site coverage can also potentially encourage building on, or into, the escarpment. However, there may be existing controls in place that discourage or prevent any development from affecting the intactness of the escarpment, such as SNAs, Coastal Hazard Areas or earthworks controls in the District Plan. |
| Garage type and location | Covered in 'Parking' | No need to update | Garages have the potential to affect the character of a street. However, as the development of active frontages on the street edge is encouraged through the design guide, it is unlikely that recent developments of garages have resulted in a substantial change to the character of the area. | This effect is expected to remain unchanged if the area undergoes higher levels of intensification. |
| Heritage buildings / areas | Covered where applicable | Needs update | Heritage listed items generally contribute to the character of an area and are subject to a separate level of control additional to the Residential Coastal Edge overlay. The effect of heritage items on the character of the residential coastal edge is expected to have remained relatively unchanged since undertaking the 2008 Coastal Edge Residential Review. | Following the recent review of heritage items in preparation of the Draft District Plan, the effect that the updated heritage listed items have on the residential coastal edge in the future and any associated sensitivity to intensification will need to be reassessed. |

Comment:

The 2008 Coastal Edge Residential Review studied ten coastal residential areas and describes the general character for each area at a predominantly area-wide scale. For the Residential Coastal Edge to be considered as a qualifying matter, a more detailed analysis would be required that evaluates the characteristics of the area on a site-specific basis.

As outlined in the table above, not all attributes actively contribute to the character of the Residential Coastal Edge. Generally, each of the fundamental character attributes, listed on page 2, are still considered valid contributors to the area-wide character of the coastal edge. Additionally, there are several attributes that have a potential effect on the local character, that should also be considered when assessing at a site specific level (e.g. presence of street trees or onsite vegetation, street width, land use).

The level of effect to which a change to any fundamental attributes, as a result of potential intensification, can have on the character of the residential coastal edge depends on the attribute. Rear lot development or infill development away from the street edge can indirectly affect the linear nature of the residential coastal edge (e.g. by an increase in driveways from the street). Infill or rear lot development also has the potential risk to affect the largely undisturbed character and completeness of the escarpment. Modifications to the street layout or street trees can affect the intimate character of the street, which is in some places relatively narrow between the coast and residential activity.

Conclusions

The Residential Coastal Edge was identified to protect the residential area comprising the linear configuration of dwellings along the coastal edge, where the coastal escarpment is the backdrop, in ten identified areas within Wellington City.

The area was viewed to be under threat from multi-unit development which had the potential to creep up the escarpment face, creating visually prominent dwellings, and adversely modifying the coastal escarpment, which provides these areas with both a clearly defined backdrop and a sense of place. Subsequent policy developed for this area under Plan Change 72 in the Operative District Plan, and Policy GRZ-PRE-01 in the Draft District Plan primarily aims to maintain the integrity of this escarpment and avoid visual intrusion from fences, walls and other ancillary development which has the potential to undermine the intactness of the escarpment, and thus the visual amenity of the area.

While the reasons for providing protection to the area are still valid, the level of analysis that was undertaken in 2008 to determine the character area was not at a 'site-specific' scale and therefore is not sufficient to meet the requirements of being considered a qualifying matter under the NPS-UD or Housing Supply legislation. To exempt the Residential Coastal Edge area from these intensification policies, a site-specific analysis would be required.

Overall, intensification (e.g. following the national Medium Density Residential Standards) is likely to result in some levels of effect within the existing residential character. The coastal edge areas currently consist of a mix of building ages, typologies and heights and these have already compromised some elements of the original residential character of the coastal edge to some extent.

A number of three storey developments or other buildings of a comparable height along the coastal edge currently exist and appear not to substantially detract from the streetscape character or views of the escarpment.

Therefore, it is expected that an increase of the intensification along the coastal edge, which mainly will affect attributes like height, typology, age and built form is likely only to result in a limited effect on the fundamental values that are the basis of the Residential Coastal Edge. Fundamental character attributes, like the vegetated escarpment, street width and adjacency to the coast, are unlikely to be adversely affected by a change in residential intensification.

Earthworks provisions will provide the Council with discretion over earthworks in relation to the existing escarpment landform. Vegetation removal is allowed outside identified areas of high or very high natural character, therefore intensification will potentially result in the loss of escarpment vegetation. Some discretion is provided for in the Earthworks provisions where new landscaping and associated planting should conceal or soften the appearance of earthworks and associated structures. Unnatural scar faces are

discouraged and untreated cut faces are favoured over artificial finishes which will maintain some characteristics of the escarpment (rocky exposed faces).

For policies relating to the Natural Environment, areas identified as Significant Natural Areas will be protected by the policies in relation to these areas, which includes some escarpment faces. These provisions will provide a level of protection to the coastal escarpment that is consistent with the existing Residential Coastal Edge provisions.

In addition to this, there are also controls on the density of development for the areas of the Residential Coastal Edge located within the Medium Coastal Hazard Area which provide for up to one residential unit, rather than three as defined by the Medium Density standards. Residential development is further discouraged within High Coastal Hazard areas, which limits areas for potential intensification and change in character.

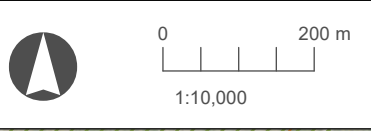
The only provisions provided for in the existing Residential Coastal Edge that are not covered by other policy or provision within the Draft Plan is Policy GRZ-PRE-01 which aims to avoid visual intrusion from fences, walls and other ancillary development; these elements have the potential to undermine the intactness of the escarpment. Under the Medium Density Residential Standards, fences and walls are a permitted activity. If desirable, additional provisions could be made around requirements for fencing and ancillary structures in the Residential Zone.

Attachments: Map Set

LEGEND

- Residential Coastal Edge precinct
- Coastal environment
- ▲ Notable trees
- Hilltops and ridgelines
- ▨ Significant Natural Areas
- Heritage buildings and structures points**
- Heritage building
- Contributing building
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- Outstanding Natural Features
- Outstanding Natural Landscape
- Special Amenity Landscapes
- geographic_name

Projection: NZGD 2000 New Zealand Transverse Mercator



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Data Sources:

Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors



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WCC Residential Coastal Edge Review
Owhiro Bay/Island Bay

Date: 17 February 2022 | Revision: 0

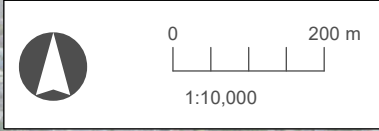
Plan prepared for Wellington City Council by Boffa Miskell Limited

Project Manager: emma.mcrae@boffamiskell.co.nz | Drawn: EMc | Checked: BEV

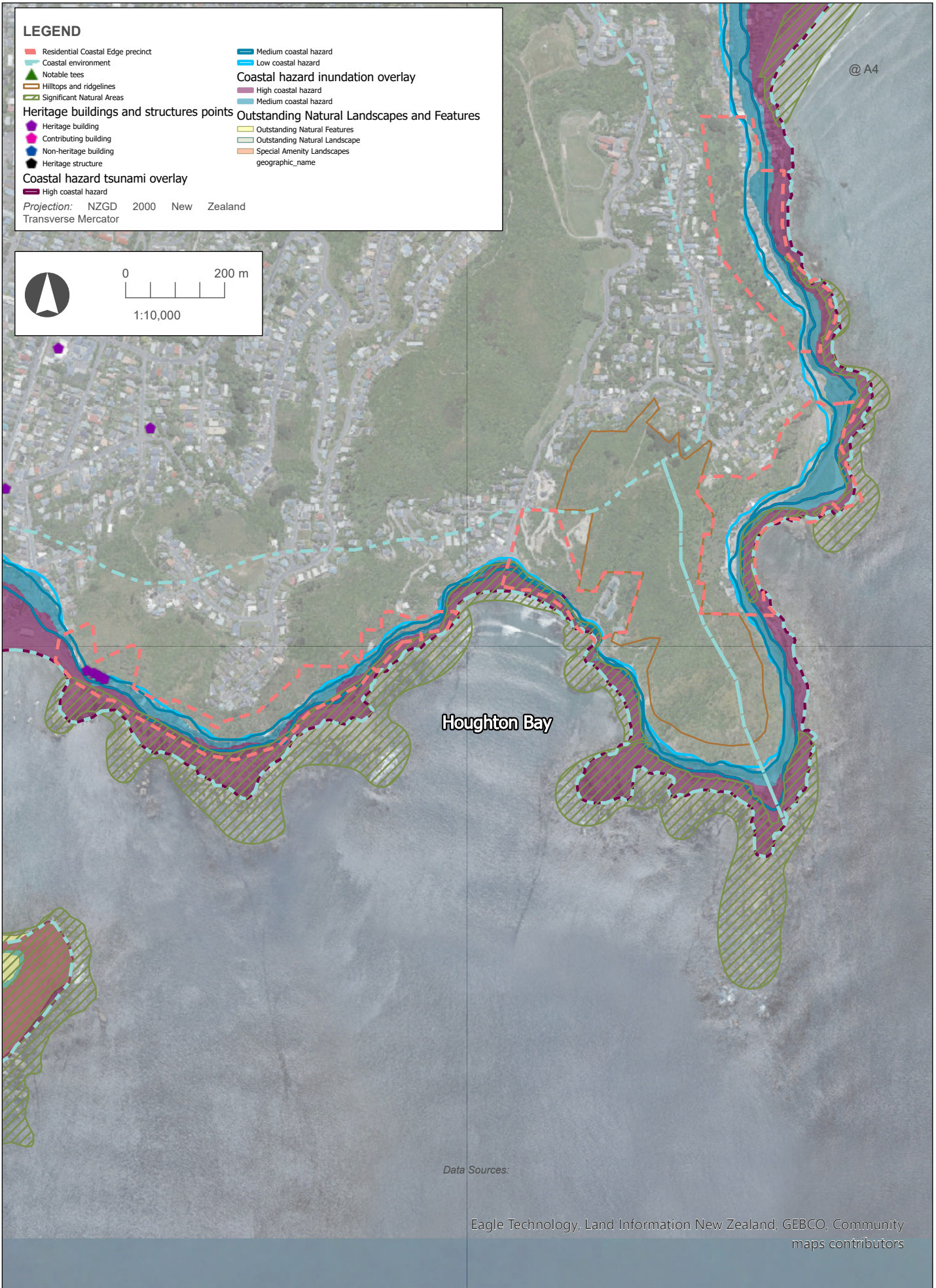
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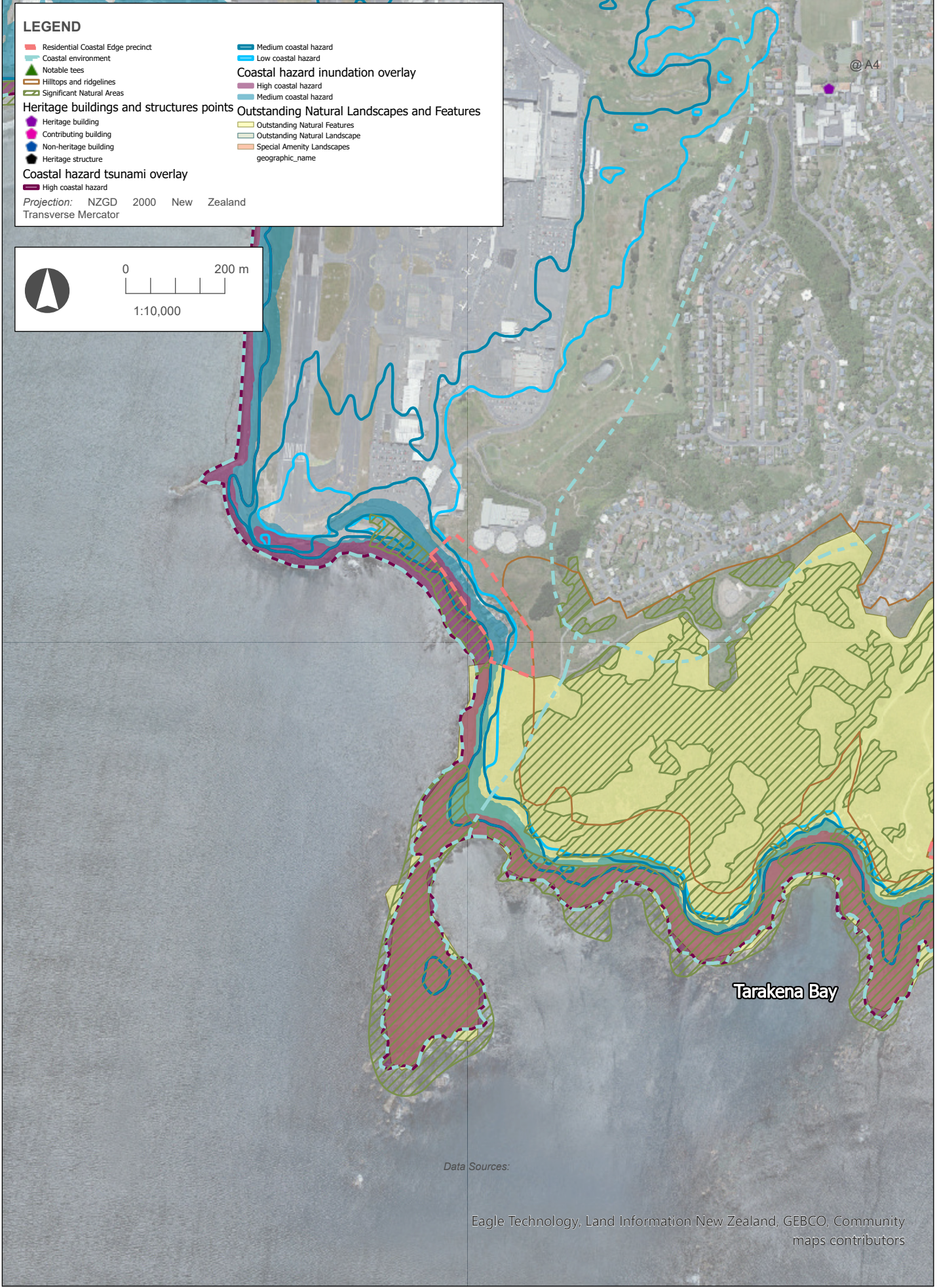
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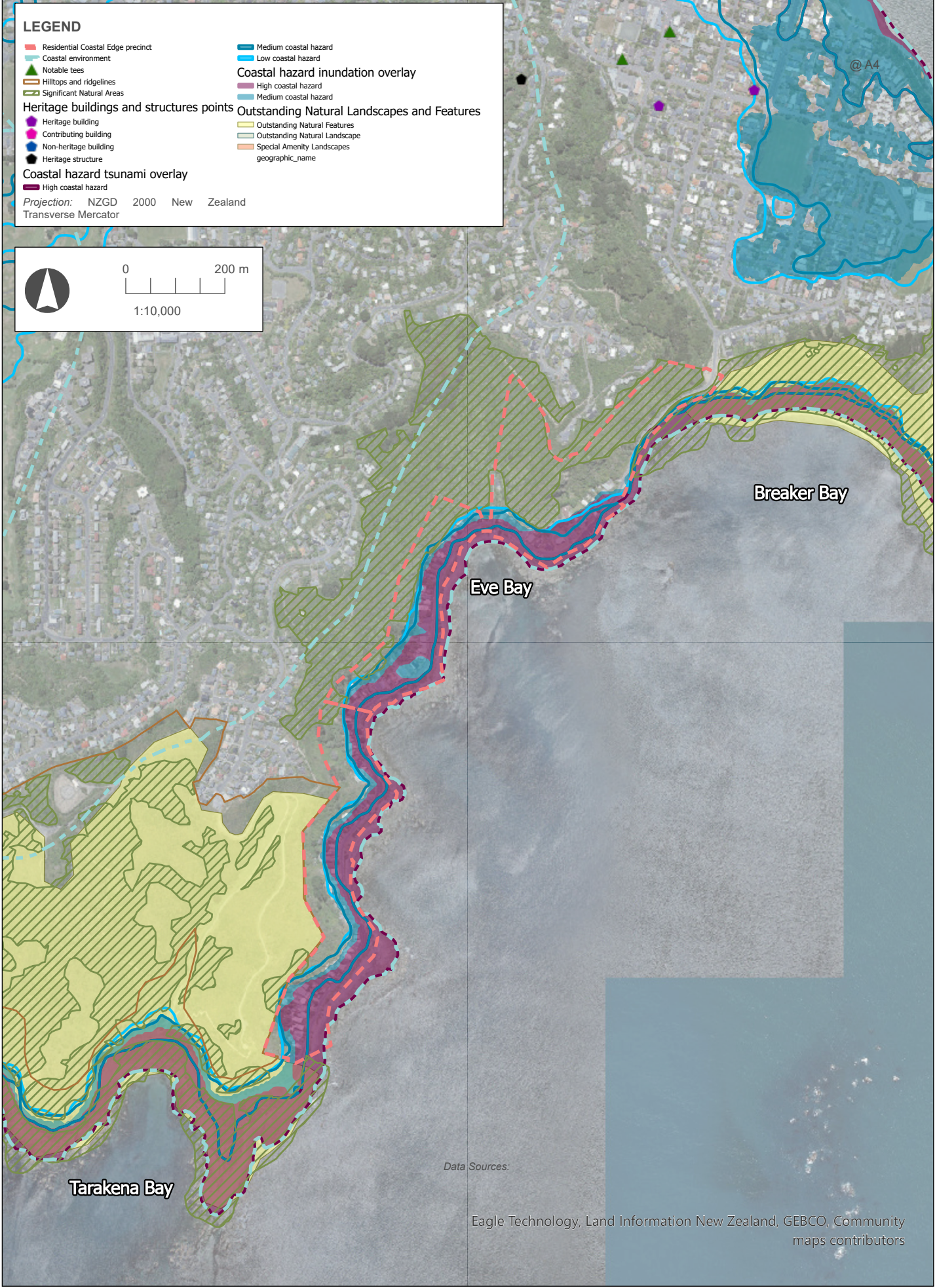
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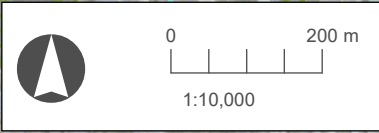
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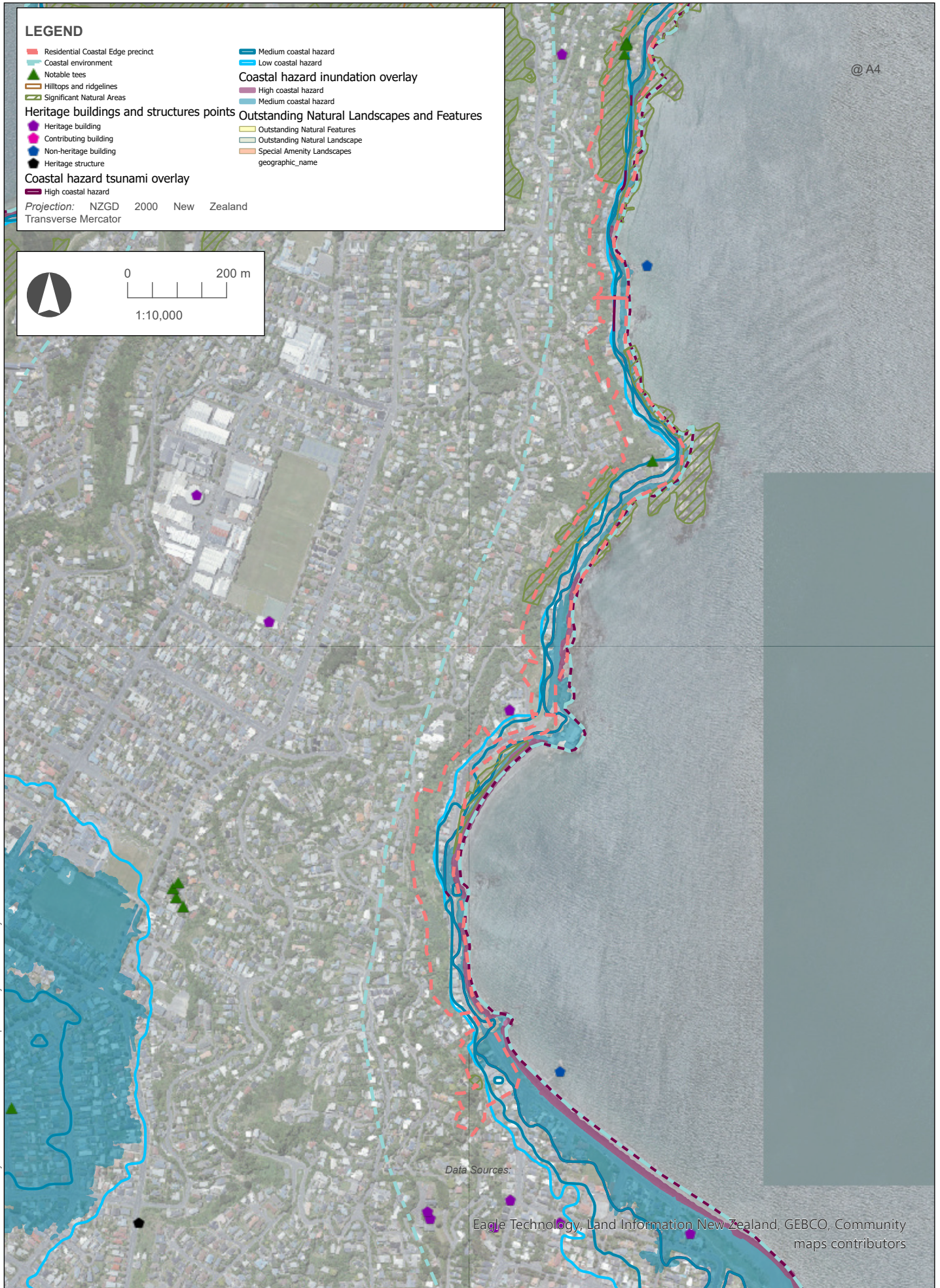
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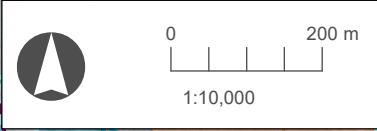
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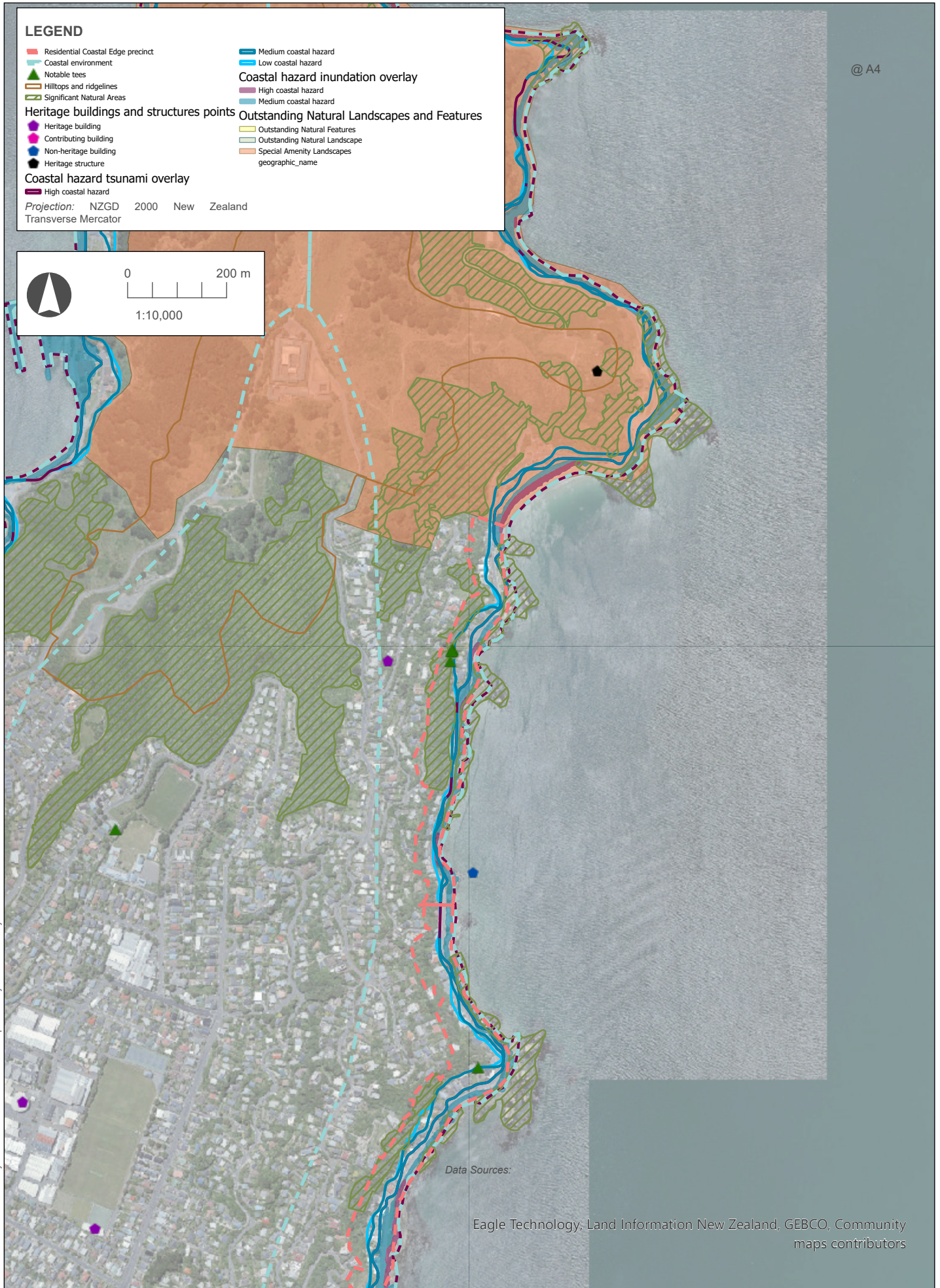
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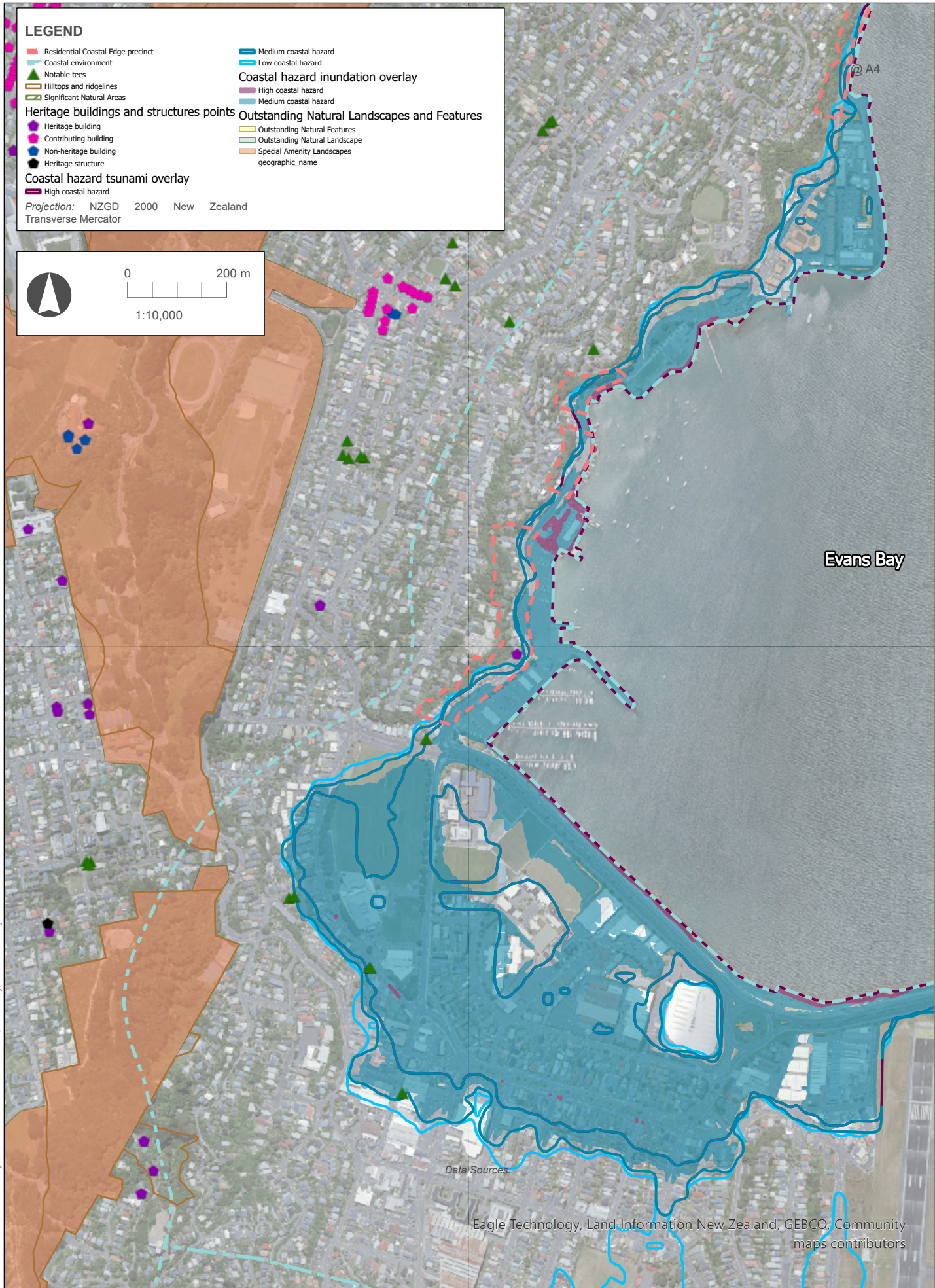
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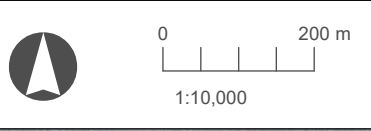
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Oriental Bay

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WCC Residential Coastal Edge Review
Roseneath

Date: 17 February 2022 | Revision: 0

Plan prepared for Wellington City Council by Boffa Miskell Limited

Project Manager: emma.mcrae@boffamiskell.co.nz | Drawn: EMc | Checked: BEV