

**Before the Hearings Panel
Appointed by Wellington City Council**

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Wellington Proposed District
Plan

**STATEMENT OF EVIDENCE OF DR JAMES ANDREW JACOBS ON BEHALF OF
HERITAGE NEW ZEALAND POUHERE TAONGA**

WELLINGTON PROPOSED DISTRICT PLAN – HEARING STREAM 2

Character Precincts Statement

16 March 2023

INTRODUCTION

1. My name is James Andrew Jacobs. I hold a Bachelor of History and a Bachelor of the History of Art & Architecture from the University of Pittsburgh, Pittsburgh, Pennsylvania, United States; a Master of Architectural History from the University of Virginia, Charlottesville, Virginia, United States; and a Doctorate in American Studies from George Washington University, Washington, DC, United States.
2. I am the Director Central Region for Heritage New Zealand Pouhere Taonga (HNZPT) for the Central Region Office. My role oversees regional operations—including heritage listing, architectural and planning advocacy, archaeology, and heritage property management—for HNZPT from the middle of the North Island south to the top of the South Island. I have been in this role for over five years.
3. Prior to my current position, I worked for 18 years in the heritage conservation field in the United States and New Zealand, work mainly centred on original historical research, analysis, and writing; assessment of heritage values; provision of architectural advice; and teaching at a tertiary level. I present this evidence as an expert, not as the Director Central Region.
4. Although this evidence is not prepared for an Environment Court hearing I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and have complied with it in when preparing my written statement of evidence. I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

SCOPE OF EVIDENCE

5. Heritage New Zealand made submissions and further submissions on the Wellington City Proposed District Plan (PDP). I have assisted in preparation of the original submission and further submission by providing built heritage and related evidence on the PDP. As Director Central Region, I was also the signatory for the submission and further submission in alignment with the delegation policy of HNZPT.
6. The scope of my evidence covers:
 - The spatial extent of character precincts; and
 - Heritage vs character.

7. In preparing this evidence I have read the relevant submissions, further submissions, and the Section 42A report prepared by Council staff and/or consultants.

SPATIAL EXTENT OF CHARACTER AREAS

8. I agree with the recommendation by the author of the Section 42A report to increase the size of the tiny remnants of the much larger Character Precinct/Area (Character Precinct) in the OPD. This more closely aligns with the conclusions regarding the areas identified as Primary/Contributory in the Boffa Miskell review of character areas, as part of the development of the Spatial Plan in 2020.
9. In my view increasing the extent of the Character Precincts contributes to reconnecting the discontinuous and isolated Character Precinct remnants, which in turn is essential for maintaining and understanding the character values of the precinct. The importance of this second point is discussed in greater detail under the heading Importance of Setting in Character Precincts.
10. I concur with the author of the Section 42A report that there is no single approach for defining the boundaries of a Character Precinct (paragraph 87). Sometimes there are obvious boundaries, such as the Town Belt/Te Ahumairangi and Tinakori Road defining the depth of the Character Precinct in the northwestern portion of Thorndon. In contrast, the Character Precincts in Newtown on either side of the Riddiford Street have less regular, defined edges. The methodology used by the author to enlarge the Character Precincts is sound, and provides a rational counterargument to the seemingly haphazard shrinking in the PDP of the existing precincts.
11. In my experience, drawing boundaries for historic districts is a combination of an art and a science. The registration of any historic district requires a boundary justification and a list of “contributing” and “non-contributing” buildings, structures, objects, etc. Every Item must be noted as either contributing to understanding the significance of the district and its heritage values or not contributing, a status that ranged from being neutral in its effect to something that seems wildly out-of-place. The rule-of-thumb for setting a boundary or extent was that if the proposed historic district included more non-contributing resources than contributing resources then it was drawn too large and needed to be critically revised. Unsurprisingly, most of the edges of urban historic districts are a bit ragged as the character-defining, contributing buildings decrease in density and, conversely, ones not sharing the physical characteristics of the historic district decrease.

12. This approach of assessing whether a building was contributing or non-contributing creates historic districts that permits the recognition of variety in the urban landscape and all its component parts. It also provides balance for the associated restrictions on changes to contributing buildings by having less stringent ones for non-contributing buildings (while still aligning with the district's design guidelines).
13. In this instance, what was proposed in the PDP for existing Character Precincts has a deleterious effect on the character values by dramatically shrinking their extent and by also creating what might be termed discontinuous "character islands" out of what had for the most part been larger rectangles and squares. In my opinion, the purpose and value of a character precinct both recognises and protects a cohesive, attractive, and appealing urban landscape. Rather than achieving this, the Character Precincts as proposed reduced the precincts to mere segments of roads and partial city blocks whereby rows of buildings, mostly houses, face each other across a street.
14. This approach promotes the street front or facade of the building as the most important in terms of heritage values. In effect, it reduces a building to its principal façade disregards the totality of the urban landscape and the important role of setting in defining the character of a place.
15. An urban landscape is far more than a road bounded on two sides by building facades. It takes in entire blocks and groups of blocks, and values the entire individual lot or section and the interior of the block as much as the streetscape and its facades. Urban landscapes are best comprehended as offering a sense of depth, both actual, physical as well as perceptual, and acknowledges the importance of the wider setting for giving context to individual buildings, streetscapes, city blocks, and neighbourhoods.
16. The setting of the urban landscape also shifts the focus from only façades to entire buildings in three-dimensions and how they are situated in their private grounds. The urban landscape also takes in the arrangement of roads, topography, plants and trees, open space, and street furniture, as well as the predominant scale, height, rhythm, setback, and materials that are the defining attributes of a character precinct.
17. The isolation of the "character islands" in the PDP, by ignoring the urban landscape and the importance of setting to understanding a Character Precinct and its component parts, risk a severe loss of integrity over time. Consider Mt Victoria: overall the neighbourhood has a wide range of building types, including apartment buildings, but the overall sense of the place is a

residential district of one- and two-story houses dating mainly from the late-19th and early-20th centuries.

18. The PDP reduced the single character precinct to six separate “islands,” one reasonably large, but a strange shape. The easternmost portion of this precinct are a cohesive group of mainly one-story houses, a number raised quite high off the ground along Elizabeth Street. For the most part, there are no visual intrusions to the streetscape, which is surprising given the number of one-story houses. In the PDP, the adjacent sections behind the Elizabeth Street houses are excluded from the precinct, which creates the risk that at some time in the future the visually independent streetscape could be hemmed in with taller buildings that will dominate the setting and degrade the character values for which the precinct was created to conserve.
19. In summary, it is important to recognise the importance of setting as a reason to keep the Character Precincts as large as possible. Within a precinct, it is wholly possible to incorporate new development in a character area without a loss of character values. To accomplish this, it is vital to have thoughtful, comprehensive design guidelines that are both enforceable and actually enforced by the Council. These guidelines should help owners to think about how their property fits into the precinct and be created with longevity in mind. Guidelines that are not enforced or that are rewritten every few years will not maintain character values. Rather, I wanted to make the point about the importance of setting as a reason to keep the Character Precincts as large as possible.
20. Enlarging character precincts is one important approach to maintaining the setting and character values of low-scale streetscapes. So, too, is the Transition/Interface of Character Precincts with surrounding blocks outside the extent. Thoughtful transitions, particularly with regard to size/scale, between Character Precincts and adjacent new development permit different types of new development benefits both. Character values are better maintained and developers are able to more intensively build up their property with less of a risk of opposition by communities and supporters of heritage.
21. This approach has been recognised successfully overseas, with the 14th Street [NW] Historic District in Washington, DC as an example. This is a linear district recognising the late-19th and early-20th century commercial development along a streetcar line, mainly two- and three-story brick buildings.

22. Following four decades of economic decline, the council began to redevelop the area by creating a design framework for the corridor that permitted new construction up to 8 stories employing setbacks to diminish the mass of the new buildings and to not overwhelm the heritage properties.
23. In order to preserve the intact setting of the smaller scaled terrace houses, the development stepped down at the rear.
24. This transition approach honoured the character values and setting of the terrace houses whilst also recognising the need for development within the city centre. In my view, this approach can be adopted successfully in Wellington's Character Precincts, albeit on a smaller scale.
25. I note that the evidence of Dean Raymond, HNZPT, also stresses the importance of transitions.

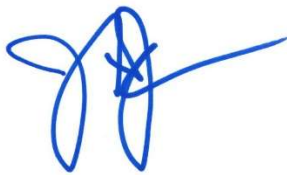
CHARACTER VS HERITAGE

26. Although in some respects character and heritage can be considered different sides of the same coin, I agree with the distinctions between Character Precincts and Heritage Precincts/Areas in the PDP.
27. Character Precincts are solely concerned with the recognition and protection of the character of a particular neighbourhood's built environment, principally through the buildings and defining attributes: type (for example, detached versus terrace houses), stylistic mode, height, scale, setback, materials, and the relationship between building and landscape.
28. Heritage Precincts are also usually identified and delineated for very similar reasons, but have added layers of significance and meaning related to the history that occurred in that area and in those buildings that could be associated with people and events or illustrate a way of life or broad societal trends.
29. The integrity of the physical character of a Heritage Precinct and its component parts, the maintenance of its character values, permits these places to convey a sense of the past and past events that would otherwise be lost through their destruction or the intrusion of incompatible new construction. Character Precincts could be Heritage Precincts merely by recognising the people, historical events, and everyday life that occurred in that area.
30. This sense of the past is not limited to the physical history of the place—for example, Newtown as a cohesive collection of late-19th and early-20th century dwellings, institutional buildings, and commercial premises that speak to the movement of the prosperous members of the mainly white working class and lower-middle class from fetid Te Aro in part spurred by the expanding system of trolleys and sustained by the largest shopping district outside the CBD. This linear retail

precinct has been recognised and protected through WCC's creation of the Newtown Shopping Centre Heritage Area, as well as an area composed of a smaller collection of shops further north near John Street and the intersection with Adelaide Road.

31. Beyond their built character, largely attained during one period of rapid expansion, those buildings and streets also tell the stories, for example, of the urbanisation of Māori, and the arrival in Wellington of Pacific Islanders, particularly Samoans, and other immigrants in the mid-20th century. They all reshaped the neighbourhood for their needs and communities. The neighbourhood is in another major period of transformation with middle- and upper-middle class movement into Newtown, along with all the good and ill aspects of gentrification. All of these sweeping changes have occurred in the same cohesive residential streets and intact commercial corridor along Riddiford Street.

32. Notwithstanding there is some overlap between heritage and character precincts, in my view inclusion of Character Precincts in the PDP will also serve to protect historic heritage in Wellington through the recognition and protection of the special character of certain parts of the city. With the precincts' urban landscape preserved and future development shaped by thoughtful and enforceable design guidelines, the Character Precincts can be easily transformed wholly or partly into Heritage Precincts by documenting their lively, layered history and stories that enrich our understanding of these urban landscapes and set out a uniquely Wellington past.



James Jacobs

16 March 2023