

Section 32 Evaluation Report

Part 2: Character Precincts and the Mt Victoria North Townscape Precinct

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Table of acronyms

Abbreviation	Full term
MDRS	Medium Density Residential Standard
MDRZ	Medium Density Residential Zone
MfE	Ministry for the Environment
NES	National Environmental Standard
NPS	National Policy Statement
NPSUD	National Policy Statement on Urban Development 2020
ODP	Operative District Plan
PDP	Proposed District Plan
RMA	Resource Management Act
RPS	Regional Policy Statement for the Wellington Region 2013
UFD	Urban Form and Development
WCC	Wellington City Council

1.0 Overview and Purpose

1.1 Introduction to the resource management issue

This report addresses the requirements of Section 32 of the Resource Management Act 1991 (RMA) in respect of the Character Precincts and the Mt Victoria North Townscape Precinct proposed as part of the Medium Density Residential Zone (MDRZ) of the Proposed Wellington City District Plan (the PDP).

Pre-1930 character areas identified in the Operative District Plan (the ODP) cover most of the inner suburbs¹ of the City. These suburbs contain high concentrations of houses constructed prior to 1930, which reflect the historical pattern of settlement and development of the city. In turn, this development pattern informs the character of these areas and has a range of wider positive streetscape and townscape effects.

The PDP seeks to maintain protection to these areas, albeit significantly reduced in area from their current extent, by identifying them as Character Precincts.

In addition to the broader pre-1930 character areas within the Inner Residential zone, the ODP also identifies the Mt Victoria North Character Area as an important neighbourhood given its high visibility and location around St Gerard's Monastery. The Mt Victoria North Character Area forms one of Wellington's most iconic views towards Mt Victoria from the central city. The PDP seeks to maintain protection for this area by identifying it as the Mt Victoria North Townscape Precinct.

This report:

- details the background to the proposed Character Precincts and the Mt Victoria North Townscape Precinct;
- summarises research undertaken to assess the character of the proposed Character Precincts, and to assess the properties comprising the Mt Victoria North Townscape Precinct in order to inform their proposed boundaries;
- examines the operation of the ODP provisions relating to the existing pre-1930 character areas and the Mt Victoria North Character Area;
- considers the statutory and policy environment relating to this topic area; and
- undertakes an evaluation of the provisions proposed to manage the Character Precincts and the Mt Victoria North Townscape Precinct.

2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Report	Relationship to this topic
Part 1: Context to s32 evaluation and evaluation of proposed Strategic Objectives	This report provides an overview of the PDP background and policy approach including the District Plan response to the requirements of the National Policy Statement on Urban Development. It also provides an evaluation of the Strategic Direction chapter of the PDP.

¹ Mt Victoria, Mt Cook, Thorndon, Aro Valley, The Terrace, Holloway Road, Berhampore and Newtown as identified in Appendix 1 to the residential chapter of the ODP.

Medium Density Residential Zone	The Medium Density Residential Zone is the underlying zone relevant to the Character Precincts and the Mt Victoria North Townscape Precinct.
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3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the PDP are relevant to these topics:

Capital City	
CC-O2	Wellington City is a well-functioning Capital City where: <ol style="list-style-type: none"> 1. A wide range of activities that have local, regional and national significance are able to establish and thrive. 2. The social, cultural, economic and environmental wellbeing of current and future residents is supported. 3. Mana whenua values and aspirations are visible, celebrated and an integral part of the City's identity. 4. Urban intensification is delivered in appropriate locations and in a manner that supports future generations to meet their needs. 5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted. 6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.
CC-O3	Development is consistent with and supports the achievement of the following strategic City goals: <ol style="list-style-type: none"> 1. Compact: Wellington builds on its existing urban form with quality development in the right locations. 2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design. 3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy. 4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets. 5. Greener: Wellington is sustainable and its natural environment is protected, enhanced and integrated into the urban environment. 6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.
Urban Form and Development	
UFD-O1	Wellington's compact urban form is maintained with the majority of urban development located within the City Centre, in and around Centres, and along major public transport corridors.

UFD-03	<p>Medium to high density and assisted housing developments are located in areas that are:</p> <ol style="list-style-type: none"> 1. Connected to the transport network and served by multi-modal transport options; or 2. Within or near a Centre Zone or other area with many employment opportunities; and 3. Served by public open space and other social infrastructure. 																				
UFD-04	<p>In order to achieve sufficient, feasible land development capacity to meet expected housing demand, the following housing bottom lines in are to be met or exceeded in the short-medium and long term in Wellington City as contained in the Wellington Regional Housing and Business Capacity Assessment (Housing Update 2022).</p> <table border="1" data-bbox="587 707 1305 927"> <thead> <tr> <th></th> <th>2021-2024</th> <th>2024-2031</th> <th>2031-2051</th> </tr> <tr> <th></th> <th>Short</th> <th>Medium</th> <th>Long</th> </tr> </thead> <tbody> <tr> <td>Demand figures</td> <td>4, 148</td> <td>8, 426</td> <td>18, 724</td> </tr> <tr> <td>Competitiveness margin</td> <td colspan="2">20%</td> <td>15%</td> </tr> <tr> <td>Housing bottom line</td> <td colspan="2">15, 089</td> <td>21, 532</td> </tr> </tbody> </table>		2021-2024	2024-2031	2031-2051		Short	Medium	Long	Demand figures	4, 148	8, 426	18, 724	Competitiveness margin	20%		15%	Housing bottom line	15, 089		21, 532
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UFD-05	<p>Sufficient land development capacity is available to meet the short-, medium- and long-term business land needs of the City, as identified in the Wellington Regional Housing and Business Capacity Assessment.</p>																				
UFD-06	<p>A variety of housing types, sizes and tenures, including assisted housing, supported residential care, and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.</p>																				
UFD-07	<p>Development supports the creation of a liveable, well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future and:</p> <ol style="list-style-type: none"> 1. Is accessible and well-designed 2. Supports sustainable travel choices, including active and micromobility modes 3. Is serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development and urban environment 4. Is socially inclusive 5. Is ecologically sensitive 6. Is respectful of the City's historic heritage, 7. Provides for community well-being; and 8. Is adaptable over time and responsive to its evolving, more intensive surrounding context. 																				
UFD-08	<p>Areas of identified special character are recognised and new development within those areas is responsive to the context and, where possible, enhances that character.</p>																				

An evaluation of these objectives is contained in the companion report Part 1: Context to s32 evaluation and evaluation of proposed Strategic Objectives.

4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management 'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment'.

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

4.1 Section 6

The following s6 matters are relevant to these topic areas:

Section	Relevant Matter
6(c)	<p><i>The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</i></p> <p>This matter is relevant as proposed Significant Natural Area overlays intercept with Character Precincts in two discrete locations – Aro Valley and Thorndon.</p>
6(h)	<p><i>The management of significant risks from natural hazards.</i></p> <p>This matter is relevant as some of the identified Character Precincts are subject to overland flow and ponding overlays. The Wellington Fault overlay also intercepts identified Character Precincts in Thorndon.</p>

The Mt Victoria North Townscape Precinct is not affected by any overlays that give rise to section 6 matters.

It is noted that section 6(f) addresses the protection of historic heritage from inappropriate subdivision, use, and development. This section is not relevant as Character Precincts do not meet the criteria for historic heritage protection under section 6(f). There are however instances where individual and collections of buildings within a precinct are also identified and proposed to be protected under the Historic Heritage provisions of the PDP. In these instances, the evaluation of the relevant heritage provisions have been considered through the development of the Historic Heritage Section 32 evaluation report.

4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
7(b)	<p><i>The efficient use and development of natural and physical resources</i></p> <p>This matter is relevant given the importance of efficiently utilising the physical resource of the existing residential areas and is relevant to the requirement to provide for increased density from the NPS-UD.</p>
7(c)	<p><i>The maintenance and enhancement of amenity values</i></p> <p>The existing character areas are valued for their contribution to the amenity enjoyed by residents resulting from their character values.</p>
7(h)	<p><i>Maintenance and enhancement of the quality of the environment</i></p> <p>Related to 7(c) above, the proposed plan seeks to ensure that the quality of the residential environment is maintained, with particular provisions applicable to the Character Precincts.</p>

4.3 Section 8

The Council has worked actively in partnership with Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira in the development of the PDP. Further, both Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira have been provided with the opportunity to provide feedback on the draft District Plan. That feedback, as relevant to this topic area, is outlined in this evaluation report.

4.4 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 has introduced new requirements for Councils in relation to the permitted scale and form of future residential development. Section 77G requires that Councils amend their District Plans to insert a prescribed set of medium density residential standards in every relevant residential zone, and that the Council gives effect to Policy 3 of the NPS-UD within these areas. The PDP includes these requirements in the Medium Density and High Density Residential Zone chapters.

Section 77G allows Councils to impose less enabling standards in these zones where 'qualifying matters' apply. This is the same approach as that provided for under the NPS-UD (Subpart 6, clause 3.33). Section 77I of the Act then specifies the requirements for assessing qualifying matters. An assessment of the Character Precincts as qualifying matters is considered at Section 9 of this evaluation report.

4.5 National Direction

4.5.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008

- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

The instrument and associated provisions relevant to these topics is:

NPS	Relevant Objectives / Policies
NPS on Urban Development 2020	<p>Objective 1 New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>Objective 2 Planning decisions improve housing affordability by supporting competitive land and development markets.</p> <p>Objective 3 Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <ul style="list-style-type: none"> (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-serviced by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment. <p>Objective 4 New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p> <p>Objective 5 Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p> <p>Objective 6 Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.

	<p>Objective 7 Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.</p> <p>Objective 8 New Zealand's urban environments:</p> <ul style="list-style-type: none"> (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change. <p>Policy 1 Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <ul style="list-style-type: none"> (a) have or enable a variety of homes that: (b) meet the needs, in terms of type, price, and location, of different households; and (c) enable Maori to express their cultural traditions and norms; and (d) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (e) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (f) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (g) support reductions in greenhouse gas emissions; and (h) are resilient to the likely current and future effects of climate change. <p>Policy 2 Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p> <p>Policy 3 In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <ul style="list-style-type: none"> (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and (c) building heights of at least 6 storeys within at least a walkable catchment of the following: <ul style="list-style-type: none"> (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and (d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of: <ul style="list-style-type: none"> (i) the level of accessibility by existing or planned active or public transport to a range of
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	<p style="text-align: center;">commercial activities and community services; or</p> <p style="text-align: center;">(ii) relative demand for housing and business use in that location.</p> <p>Policy 4 Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.</p> <p>Policy 6 When making planning decision that affect urban environments, decision-makers have particular regard to the following matters:</p> <p style="margin-left: 40px;">(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement</p> <p style="margin-left: 40px;">(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p style="margin-left: 80px;">(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p style="margin-left: 80px;">(ii) are not, of themselves, an adverse effect</p> <p style="margin-left: 40px;">(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p style="margin-left: 40px;">(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p style="margin-left: 40px;">(e) the likely current and future effects of climate change.</p> <p>Policy 7 Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long terms in their regional policy statements and district plans.</p> <p>Policy 8 Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</p> <p style="margin-left: 40px;">(a) unanticipated by RMA planning documents; or</p> <p style="margin-left: 40px;">(b) out-of-sequence with planned land release.</p>
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4.5.2 Proposed National Policy Statements

In addition to the five NPSs currently in force there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

4.5.3 National Environmental Standards

In addition to the NPSs there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

There are no NESs of direct relevance to these topics.

4.5.4 National Planning Standards

The National Planning Standards provide for a range of zone and spatial layer options to be included in Part 3 – Area Specific Matters of the District Plan. The following options have been considered:

Spatial Layer	Description
Precincts	A precinct spatially identifies and manages areas where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone(s). If applying to multiple zones, in the multi- zone precincts chapters.
Overlays	An overlay spatially identifies distinctive values, risks or other factors which require management in a different manner from underlying zone provisions.

Given that the proposed Character Precincts and the Mt Victoria North Townscape Precinct apply to a single zone (the Medium Density Residential Zone) and apply to place-based provisions relating to the underlying zone, the use of a Precinct is the appropriate spatial layer from the National Planning Standards.

4.6 National Guidance Documents

The following national guidance documents are considered relevant to this topic:

Document	Relevant provisions
Understanding and implementing intensification provisions for the National Policy	The document forms part of a series of guidance documents prepared to help local authorities understand and interpret the provisions of the NPS-UD. This guidance document relates specifically to Objective 3, Policies 3 to 5 and clauses 3.31 to 3.34 of subpart 6 of the NPS-UD. The guidance provides methods, tools and examples to help implement these provisions effectively.

Statement on Urban Development Ministry for the Environment, 2020.	The relevant section of the report to this assessment is section 6.6 which deals with qualifying matters.
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4.7 Regional Policy and Plans

Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for 'Regional Form, Design and Function' contained in the RPS.

Regional Form, Design and Function	
Section	Relevant matters
Objective 22	Objective 22 seeks to achieve a compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and: (a) a viable and vibrant regional central business district in Wellington City; (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality; (e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form; (g) a range of housing (including affordable housing); (i) integrated land use and transportation; (k) efficiently use existing infrastructure (including transport network infrastructure).
Policy 30 (M)	Maintaining and enhancing the viability and vibrancy of regionally significant centres Policy 30 requires district plans to enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city.
Policy 31 (M)	Identifying and promoting higher density and mixed use development Policy 31 requires district plans to: <ul style="list-style-type: none"> • Identify centres suitable for higher density development • Identify locations with good access to the strategic public transport network, suitable for higher density development • Include policies, rules and methods to encourage higher density development in these areas.
Policy 54 (R)	Achieving the region's urban design principles

	Policy 54 requires district plans to have particular regard to achieving the region's urban design principles. The principles are set out in Appendix 2 to the RPS and include: context, character, choice, connections, creativity, custodianship, and collaboration.
Policy 57 (R)	<p>Integrating land use and transportation</p> <p>Policy 55 requires that particular regard be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:</p> <p>(a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;</p> <p>(b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;</p> <p>(c) whether there is good access to the strategic public transport network;</p> <p>(d) provision of safe and attractive environments for walking and cycling; and</p> <p>(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.</p>
Policy 58 (R)	<p>Co-ordinating land use with development and operation of infrastructure</p> <p>Policy 58 requires that particular regard be given to whether the proposed subdivision, use or development is located and sequenced to:</p> <p>(a) make efficient and safe use of existing infrastructure capacity; and/or</p> <p>(b) coordinate with the development and operation of new infrastructure.</p>

M = policies which must be implemented in accordance with stated methods in the RPS
R = policies to which particular regard must be had when reviewing a district plan

Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for Discharges to Land, 1999
- Proposed Natural Resources Plan, appeals version 2021

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to appeal.

None of the above regional plans are relevant to the proposed Character Precincts or the Mt Victoria North Townscape Precinct.

4.8 Iwi Management Plan(s)

There are no Iwi Management Plans relevant to these topics.

4.9 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

Plan / Strategy	Organisation	Relevant Provisions
Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021	Wellington City Council	The Spatial Plan was prepared as a non-RMA document to guide the future development strategy for Wellington. The Spatial Plan identifies the Council's preferred areas over which to maintain character protection.
Wellington Regional Housing and Business Development Capacity Assessment 2019	Wellington City Council	The Capacity Assessment was prepared as a requirement of the then National Policy Statement on Urban Development Capacity. The document models the operative District Plan enabled capacity for development within the city. This in turn informs the current District Plan development capacity settings under the replacement National Policy Statement on Urban Development.
Wellington Regional Housing and Business Development Capacity Assessment 2021	Greater Wellington Regional Council/Wellington City Council	This Capacity Assessment was prepared as an updated report to the preceding 2019 assessment as required by the new National Policy Statement on Urban Development. The report considers capacity requirements over the 2021-2051 timeframe.

4.10 Other relevant legislation or regulations

There is no other legislation or regulations relevant to this topic.

5.0 Resource Management Issues Analysis

5.1 Background

The existing pre-1930 character areas and the Mt Victoria north character area have a long established history within the ODP.

By way of brief summary, the genesis of the current pre-1930 character areas and associated provisions is the Wellington Inner City Residential Areas Urban Design Evaluation completed in December 1995 by Graeme McIndoe, Chris McDonald and Christina van Bohemen.

This evaluation was commissioned by the Council in response to submissions on the then PDP, notified in 1994. Those submissions requested amendments to the proposed plan to include additional provisions to protect the built character of some inner-city suburbs. Key concerns were raised around the loss of pre-1930 housing stock and the impact of infill and multi-unit development which was considered to be incompatible with the context of certain areas.

The areas included within the pre-1930 character areas have grown over time as part of the ongoing development of the District Plan to reach their current extent. The areas were amended, expanded and the applicable provisions refined through Variation 14 to the then PDP, Plan Change 38, Plan Change 50 and Plan Change 72. They have been, therefore, a long-established feature of the District Plan over some 28 years.

Like the general pre-1930 character areas, the Mt Victoria North character area was introduced as part of the development of the then PDP. The key rule relating to the construction of buildings or additions and alterations provided for the activity as a controlled activity. Minor changes to wording were made through plan changes 6, 11 and 28.

Plan Change 72 changed the activity status for the construction or additions and alterations to a building, moving it from a controlled activity to a restricted discretionary activity as it is currently provided for by Rule 5.3.5 of the ODP.

5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the Character Precinct and Mt Victoria North Townscape Precinct specific provisions. This advice includes the following:

Title	Author	Brief synopsis
Wellington City Council: Pre-1930 Character Area Review 2019	Boffa Miskell Ltd	<p>This document reviewed the existing pre-1930 character areas and informed the identification of the Character Precincts.</p> <p>It assessed and classified each property within the existing pre-1930 character areas based on the character contribution. This scale involved classifying building as primary, contributory, neutral and detractive.</p> <p>This classification was then utilised as a basis for the identification of the Character Precincts proposed in the PDP.</p>
Wellington City Council: Pre-1930 Contiguous Area Assessment	Boffa Miskell Ltd	This document assessed eight areas that were identified as part of the Character Area Review as contiguous with the existing pre-1930

		character areas and warranting assessment of their character values.
Mt Victoria North Townscape Precinct – Draft District Plan Provisions/Urban Design Review	Urban Perspectives Ltd	This report analyses the townscape importance of the Precinct, evaluates the boundaries of the Precinct and comments on the associated PDP provisions.

5.2.1 Analysis of Operative District Plan provisions relevant to this topic

For the purposes of this report the key provisions in the operative Wellington District Plan of relevance to this topic are those relating to pre-1930 character areas and the Mt Victoria character area. The relevant provisions are summarised below and are set out in full at Appendix 2.

Topic	Summary of relevant provisions
Inner Residential Zone (Pre-1930 Character Areas and Mt Victoria North Character Area)	<p>There is one relevant objective (Objective 4.2.2) which seeks the following:</p> <ul style="list-style-type: none"> To recognise and enhance those characteristics, features and areas of the Residential Area that contribute positively to the City's distinctive physical character and sense of place. <p>This objective is implemented by a single supporting policy (Policy 4.2.2.1):</p> <ul style="list-style-type: none"> Maintain the character of Wellington's inner-city suburbs. <p>There is a single rule that is specific to the pre-1930 character areas, being rule 5.3.6 which restricts the demolition of a pre-1930 building:</p> <ul style="list-style-type: none"> The demolition of any building (including the removal or demolition of architectural features from the primary elevation of any building), excluding accessory buildings, constructed prior to 1930 (or for which approval for construction was granted before 1930) in the Inner Residential Areas and Holloway Road (Outer Residential Area) shown in Appendix 1, is a Discretionary Activity (Restricted) in respect of: <ul style="list-style-type: none"> the contribution made by the existing building to the townscape character of the neighbourhood the physical condition of the existing building the design of any proposed works (including any replacement building, or additions and alterations to an existing building), and the impact of these works on the townscape character of the neighbourhood <p>In respect of the Mt Victoria North character area, Rule 5.3.5 is applicable. Rule 5.3.5 states:</p> <ul style="list-style-type: none"> In the Thorndon Character Area and Mt Victoria North Residential Character Area identified on the District Plan maps, the construction, alteration of, and addition to residential

Topic	Summary of relevant provisions
	<p>buildings, accessory buildings and residential structures, is a Discretionary Activity (Restricted) in respect of:</p> <ul style="list-style-type: none"> ○ design (including building bulk, height, and scale), external appearance, and siting (including landscaping, parking areas, vehicle manoeuvring and site access) ○ provision of parking and site access <p>Activity and building and structure standards otherwise mirror the underlying Inner Residential zone. Key activity and building and structure standards include:</p> <ul style="list-style-type: none"> • Residential activity as a permitted activity • One residential dwelling per site as a permitted activity • More than one dwelling as a multi-unit development, requiring resource consent as a restricted discretionary activity • Front yard setback: 1m; except in Mt Victoria, Newtown and Berhampore where it is 3m • Side and rear yard: 0m; except in Mt Victoria where a 1.5m rear yard is required • Maximum width of accessory building in front yard: 4m • Ground level open space: 35m² per unit • Site coverage: 50% except in Aro Valley where 40% • Maximum building height: 10m except in Aro Valley where it is 7.5m and Mt Cook, Newtown and Berhampore where it is 9m • Building recession planes: 2.5m and various angles on inclination depending on boundary orientation (45-71 degrees) • Maximum fence height: 2m

The existing approach of the ODP is strongly focused on the retention of existing pre-1930 dwellings, and a presumption against demolition. To achieve demolition of an existing building, a high hurdle must be cleared, as outlined in the explanatory text to Policy 4.2.2.1:

"When assessing a consent to demolish a pre-1930 building Council will consider first and foremost the contribution made by the existing building to townscape character. Council will assess:

- *the level of visibility of the existing building from surrounding public spaces, including whether the building features in short, medium or long-range views*
- *whether the existing building is consistent in form and style with other pre1930 buildings that contribute positively to townscape character*
- *the extent to which the existing building retains its original design features relating to form, materials and detailing and the extent to which the form, style and important details have been modified*
- *whether the building is an integral part of a row of buildings that are consistent in form, scale and siting*

- *whether the building is important to the context of a building listed in the Schedule of Listed Heritage Items*
- *whether the building is within a sub-area identified in the Appendices to the Residential Design Guide*
- *whether the building represents a rare or unique example of pre-1930 architecture*

In addition to Rule 5.3.6 being applicable to pre-1930 character areas, Rule 5.3.5 provides for specific requirements for the existing Thorndon Character Area and Mt Victoria North Character Area. In these areas, any new building, or additions and alterations to an existing building, require a resource consent. The explanatory text to Policy 4.2.2.1 comments on this area as follows:

The Mt Victoria North Character Area has been identified as an important neighbourhood due to its high visibility and it's proximity to St Gerard's Monastery and the escarpment below. When viewed from the Central Area (and in particular the waterfront) the houses, monastery and escarpment combine to form one of Wellington's most iconic urban landscapes. In this context the design of buildings is particularly important, so Council has placed additional controls on the design of additions and alterations to existing buildings in this area. The Council is concerned to ensure that any additions and alterations are well designed, respect the predominant patterns of the surrounding neighbourhood and the setting of St Gerard's Monastery.

The Thorndon Character Area is not being carried over into the PDP as it has been included as either a Heritage Area overlay or a Character Precinct within the PDP.

5.2.2 Analysis of Resource Consents

Character Areas

A sample of resource consents from 2000 to 2019, relevant to the pre-1930 character areas, were analysed as part of the development of the PDP. Resource consents relevant to the Inner Residential zone were extracted from the Council's resource consent management software, and further refined to those consents that 'triggered' Rule 5.3.6 relating to demolition within a pre-1390 character area.

A total of 257 resource consents were analysed and broken down by suburb as follows:

Area	Number of Consents
Aro Valley	16 Consents
Berhampore	21 Consents
Kelburn (Part of the Aro Valley character area)	1 Consent
Mount Cook	22 Consents
Mount Victoria	103 Consents

Area	Number of Consents
Newtown	48 Consents
Pipitea (Part of the Thorndon Character Area)	1 Consent
Te Aro (Part of The Terrace Character Area)	1 Consent
Thorndon	43 Consents
Wellington Central (Part of the Terrace Character Area)	1 Consent

The analysis identified a number of trends:

1. Demolition

Demolition for the purposes of Rule 5.3.6 of the ODP means:

- The removal, destruction or taking down of the 'primary form' of any building; or
- Additions and alterations (including partial demolition) that are so substantial that the 'primary form' of the building is rendered illegible; or
- The removal, destruction or taking down of architectural features or elements on the 'primary elevation(s)' of any building.

The sampled resource consents showed 37 applications triggered Rule 5.3.6 i.e. contained 'demolition' within the classification of the resource consent. Partial demolition, and the demolition of garages were filtered out of the sample as well as applications that did not propose redevelopment. This left 21 applications, or just over 1 per year on average.

Of those applications, two were publicly notified, and one was limited notified. None of the applications were declined.

There are two relevant aspects to granting a consent to demolish and approve a replacement building.

The first relates to the justification for removing the existing building. The two key themes that emerged in this respect are:

- The poor condition of the building, the building being unsafe, and the economic viability of repair.
- The poor quality of the building in terms of its character. Often this point was reflected in a range of ways - poor quality, a history of additions and alterations, inconsistency of form and style, and poor streetscape contribution.

The second element relates to approving replacement buildings. Replacement buildings are assessed against the Residential Design Guide including any specific character area appendices. This is undertaken with input from Council urban design advisors. Consideration of the resource consents shows that this input often leads to amendments being made to proposals to ensure they achieve appropriate outcomes against the current ODP.

The assessment highlights that demolition of pre-1930 buildings is occurring but that it is sporadic and tightly controlled.

One issue that potentially arises is how the ODP sequences the approval of a demolition with approval of a subsequent development proposal. While not part of the resource consent sample for this work given the timeframe over which the sample was taken, a more recent resource consent application approached this matter differently.

In this example, given the uncertainty and cost of obtaining a resource consent approval for demolition, the applicant was reluctant to commit to an alternative proposal. Rather, the applicant proposed a condition of consent that should the demolition consent be successfully obtained, then prior to the demolition occurring, a replacement dwelling would be consented. Conditions of consent secured the applicability of assessment criteria including design guides which would otherwise not have applied.

This highlights a potential area of risk - committing to a new development concept without securing approval of demolition - and also a solution to the problem under the current settings of needing to propose a replacement proposal to be assessed concurrently. This matter has been considered in developing the proposed provisions for the Character Precincts. Demolition under the proposed provisions is not conditional upon a new proposal.

In terms of partial demolition, it is noted that the assessment of such proposals follows a similar track to that of total demolition (as described above). The nature of the demolition is assessed and the proposed works, typically additions and alterations, are then assessed with reference to District Plan requirements including the Residential Design Guide.

Summary

The current ODP policy framework relevant to pre-1930 character areas establishes a high threshold for the demolition of pre-1930 buildings. In this context it can be concluded that the current controls on pre-1930 buildings work well in achieving the relevant objective and policy by controlling the demolition of existing pre-1930 buildings, and appropriately assessing replacement buildings to ensure they make a positive contribution to townscape and streetscape character.

2. Multi-unit Development

A development of two or more units, or the conversion of an existing dwelling into two or more units, is considered to be a multi-unit development in the Inner Residential area. Of the sample of resource consents considered, 53 were classified as a multi-unit development.

Multi-unit developments that resulted in the creation of multiple new dwellings were often associated with demolition. In these instances, the first matter of assessment was the condition and/or character contribution of the existing building, before assessing the proposed multi-unit development against the relevant District Plan criteria, including the residential design guide.

With the exception of Mt Victoria, which is the location for over one third of the multi-unit developments in the sample, there is no discernible pattern to the distribution of the multi-unit developments considered as part of the sample. The sampled multi-unit developments were located across the various character areas as follows:

- Berhampore: 7
- Mt Cook: 6
- Mt Victoria: 18
- Thorndon: 6
- The Terrace: 1
- Newtown: 9
- Aro Valley: 6

Of the 53 multi-unit consents, 33 resulted in the creation of at least one new dwelling. The number of dwellings created by the 33 resource consents sampled is broken down as follows:

Number of Dwellings Created	Number of Consents
1-2 Dwellings	17
3-5 Dwellings	8
6-10 Dwellings	5
11-15 Dwellings	1
16-20 Dwellings	2

The largest proposal was for 20 new dwellings. This proposal included the demolition of buildings on the site including one which contained elements of a pre-1930 primary elevation. This application was notified on a limited basis and was granted consent at a hearing.

One application was publicly notified, being a proposal for demolition and a subsequent multi-unit development of 3 dwellings. Consent was granted following a hearing. One further proposal was limited notified, being a proposal for demolition and a multi-unit development of 8 dwellings, with consent granted following a hearing. Again, consideration of these proposals firstly focused on the merits of the proposed demolition, before assessing the replacement proposal.

Just over half of the 33 multi-unit consents that were sampled created 1-2 dwellings. This is reflective of buildings being converted into two units, and infill development. It is further reflective of the fragmented nature of land in these areas meaning sites are generally smaller, limiting their further development or redevelopment and resulting yield.

Larger developments are fewer in number, reflective of the smaller number of larger sites. Only 3 consents created new developments of 11 or more dwellings (13, 17 and 20 dwellings respectively). This highlights the lack of availability of larger or windfall sites.

Of the consents that were treated on a non-notified basis, it was unclear from the data available how many of those consents required affected party approval. The assessment is suggestive however that some applications were being notified so it can reasonably be concluded that where the effects of a proposal were considered against the statutory tests, then affected parties are being identified.

3. The vast majority of consents proceed on a non-notified basis

Only 8 of the 257 sampled resource consents were processed under either full public notification (4) or limited notification (4). None were declined consent.

Three of these applications related to the multi-unit developments highlighted above.

Four applications were for demolition proposals with replacement buildings. One of these was for a non-residential building, being the demolition of a church to be replaced by a new church building. Three applications were for residential buildings to be demolished and replaced.

The one remaining consent related to additions and alterations that breached a range of permitted activity standards. This application proceeded to a hearing and was granted resource consent.

It is noted that Rule 5.3.6 does not contain a non-notification statement unlike some other rules in the District Plan such as Rule 5.3.7 relating to multi-unit developments. This means that notification decisions are made purely based on the requirements of the Act.

4. Obstruction of the primary building form by parking facilities and structures

A number of consents involved the construction of garages, car ports or other parking structures on a site with a pre-1930s building between the road frontage and the elevation of the building.

The underlying issue highlighted by these consents is the relationship of pre-1930 buildings to the street. There is potential for parking structures to impact on this relationship and detract from the streetscape by obstructing the primary form of

the given dwelling. This in turn impacts on the level of character contribution made by the dwelling as described further below.

This matter is highlighted by comments from Council's urban design advisors prepared as part of the resource consent process. Extracts include:

- *The proposal to alter the house to incorporate a parking space for a car is not generally within the character of the existing neighbourhood...while it does not demolish any 1930s features specifically, it does alter the relationship of the bay window to the ground plane which has a detrimental effect on the facade, and therefore the streetscape.*
- *Ideally, the frontage would be landscaped rather than used for parking. However, once a single garage is installed, the topography leaves little room for meaningful landscaping. The double garage takes up a bit more space, and at pre-app stage the frontage was very hard and dominated by the garage. This has now been mitigated to some extent by the planters and trellis with climbers.*
- *Apart from the domination of car parking at the street edge, the proposal meets the objectives of the Residential Design Guide.*
- *The previously consented scheme mostly left this elevation unchanged, but involved a row of four garages and car ports that would have reduced this already small contribution. While the changes are not an ideal result from a purist character perspective, the house itself will provide a positive address to the street.*

5. Increased certainty of approval if a façade had been previously modified

The review of consent decisions showed previous alterations to a building can set a precedent for later resource consent applications involving the same building. While each situation will be different (based on the extent of any earlier change), the underlying rationale is that the character of a given dwelling will have already been altered such that further alteration is more acceptable and will not lead to the erosion of character that has already been affected. The nature of the change is still a consideration and it follows that there may be a degree of change that could be proposed that would remain unacceptable.

Of the 257 consents, 26 clearly demonstrated that buildings with previous alterations contributed to the outcome of the resource consent.

6. Increased site coverage does not appear to be a barrier to obtaining resource consent

The review of consent decisions shows that site coverage is a common standard breach by proposals and that these consents are typically granted. Permitted site coverage for the existing Inner Residential zone is 50%. Above 50%, resource consent is required as a restricted discretionary activity for any breach of that standard, provided that the standard is not breached by more than 20% (i.e. up to 60% total site coverage). Any breach beyond that threshold requires resource consent as a non-complying activity.

A total of 54 resource consent applications breached the site coverage standard. Only one of the applications was notified, on a limited notified basis, however site coverage does not appear to have been the cause of that notification (rather the breach of other bulk and location standards was the cause). The highest site coverage recorded was 68% by three of the 54 applications.

The Inner Residential areas are inherently of a high density. This was noted in a number of applications as a supporting reason for accepting a greater level of coverage. Site coverage is an indicator of potential over-development which will also be signaled by breaches of other standards such as setbacks, recession planes and open space requirements. The relationship between site coverage and open space requirements is particularly strong as increased coverage makes it increasingly difficult to achieve open space requirements.

7. Breaches of other permitted activity standards

The sampled resource consents show that proposals are breaching a range of other bulk and location standards, often with multiple standards breached by any given proposal.

There is no consistent theme in the standards that are being breached, compared to site coverage which was breached by over 25% of the sampled consents. The standards which were breached vary, as does the extent of breach, given site specific factors. Overall, it can be concluded that the standards operate as intended - they establish a baseline and breaches of this baseline are appropriately assessed through the resource consent process.

Mt Victoria North Character Area

A comparable exercise of considering resource consent applications was undertaken within the Mt. Victoria North Character Area. The period considered was 2011 to 2021.

There were 24 applications within that time. Of principal relevance to this assessment are the number of applications that triggered Rule 5.3.5. As would be expected given that Rule 5.3.5 is concerned with the construction, alteration of and addition to residential buildings -15 of the 20 applications related to additions and alterations that were visible from the street, and 5 applications were for additions and alterations that were not visible from the street.

15 of the applications were processed as a restricted discretionary activity. Other non-compliances or proposed activities pushed the remaining nine applications into a higher activity status. All applications were processed on a non-notified basis, and none were declined.

A common theme identified through the assessment related to changes to an existing elevation visible to the street, commonly the replacement of windows. Additions and alterations not visible from the street typically related to a building extension.

Outside of this broad theme, it can be concluded that while a resource consent process is imposed for the construction of a new building, or additions and alterations to an existing building, resource consents within the sample period were always granted, and were processed on a non-notified basis. This suggests that the purpose of the rule - ensuring appropriate design that is sympathetic to the values of the area – is working well in achieving the objective of the ODP.

5.2.3 Analysis of pre-application meetings

While section 5.2.1 highlights the outcomes emerging from processed resource consents, what is not captured are the outcomes of pre-application meeting processes. This is particularly relevant to any proposal to demolish a pre-1930 building.

The Council records requests made for pre-application meetings. An assessment was made of the pre-application data which recorded requests for pre-application meetings from September 2005 to November 2020. 93 pre-application meetings were held over that time relevant to pre-1930 buildings. An equivalent exercise was not undertaken for the Mt Victoria North character area.

Of those 93 proposals, 51 were clearly for a demolition proposal. There were a further 3 proposals where, from the available description, it was unclear whether a demolition aspect was involved. Accordingly, they were classified for the purposes of this assessment as not involving demolition. There were 42 proposals that involved works on a pre-1930 dwelling that did not involve a demolition component. Of these, 4 proposals may have involved demolition, but it was unclear from their description and so they have been classified as not requiring demolition.

Those pre-application meetings were then cross-checked against the list of sampled resource consents. Of the 93 pre-application meetings, only 30 clearly progressed to a resource consent application. Of those 30, 13 were applications for demolition. The remainder were for additions and alterations and other site works.

A further 9 sites were recorded for pre-application meetings that were then also subject to a resource consent. However, due to variances in timing, or in the descriptions of the proposals, it was not possible to firmly link the two proposals. Of those 9, 5 related to demolition, the others to additions and alterations.

It is noted that pre-application processes are not mandatory, and it should not be expected that every proposal that comes forward for a pre-application meeting will result in a resource consent application. Similarly, a number of proposals progress straight to a resource consent application without a pre-application meeting.

Those proposals that are subject to a pre-application meeting, may not then result in a resource consent application for a variety of reasons. An applicant's plans or circumstances may change, a proposal may not prove feasible, or feedback from the pre-application meeting may be unfavourable causing an applicant to reconsider. In respect of this last point, and to supplement this assessment, discussions were also held with staff in the Council's resource consents team. Those discussions have confirmed that proposals to demolish a pre-1930 building are closely considered and, anecdotally, that a number of proposals come forward for a pre-application meeting that ultimately do not result in a subsequent resource consent application due to the feedback provided. This feedback supports the conclusions that can be drawn from the sampled data.

These findings further support the conclusions of the previous section. That is, in the context of the existing District Plan objectives and policies which seek to retain pre-1930 character areas, the implementation of the District Plan appears to be operating as intended and that proposals to demolish or alter pre-1930 buildings are carefully considered.

5.2.4 Analysis of other District Plan provisions relevant to this topic

Current practice has been considered in respect of this topic, with a review undertaken of the following District Plans. It is noted that these plans pre-date the National Planning Standards and the NPS-UD, and recent amendments to the RMA and as such do not reflect those requirements².

Plan	Local Authority	Description of approach
Auckland Unitary Plan	Auckland Council	<p>The Auckland Unitary Plan contains Special Character Overlay Areas applying to certain residential and business areas. These seek to manage the special character values of these areas which are described in a character area statement.</p> <p>The relevant policy seeks to maintain the built form, design and architectural values of the buildings and the area, so that new buildings, additions and alterations achieve the following outcomes:</p> <ul style="list-style-type: none"> ▪ The continuity or coherence of the identified character values ▪ Maintain the streetscape qualities and cohesiveness ▪ Respond positively to the patterns of development in the area ▪ Maintain the relationship of built form to open space ▪ Maintain the setting of the area such as trees and landform ▪ Enable the removal of features that detract from the character of the area ▪ Require materials to be compatible with the age and detailing of the area <p>The policy discourages the removal or substantial demolition of buildings that contribute to the continuity or coherence of the area. Applications to demolish need to demonstrate that the loss of</p>

² It is noted that Auckland Council has developed a plan change to give effect to the MDRS and Policy 3 of the MDRS. The Plan Change is understood to seek to maintain character protection over certain areas as a qualifying matter.

		<p>the building would not erode the character values of the area and would not disrupt the cohesiveness of the streetscape of the special character area.</p> <p>The policy also seeks to manage the design and location of car parking, garaging and accessory buildings to maintain and enhance the streetscape and special character values of the area.</p> <p>Building standards provide for:</p> <ul style="list-style-type: none"> ▪ A maximum height of 8m ▪ Recession planes – 3m and 45 degrees ▪ Yard setbacks – front boundary determined by average of existing setbacks on adjacent properties, side boundary 1.2m and rear 3m ▪ Building coverage – proportionate to site area ▪ Landscape area – percentage of land area ▪ Max paved area – percentage of land area <p>In terms of rules, the plan provides for restoration and repair as a permitted activity, as well as minor alterations to the rear of a building where the works match the design and materials of the existing dwelling.</p> <p>Total or substantial demolition is provided for as a restricted discretionary activity. The construction of a new building or relocation of an existing building is also a restricted discretionary activity, as are exterior alterations and additions.</p> <p>In respect of demolition, the Council restricts its discretion to:</p> <ul style="list-style-type: none"> ▪ Streetscape and special character context ▪ Current building integrity ▪ The relationship to adjoining buildings and group contribution ▪ Building condition and the cost and practicality of repair
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		<ul style="list-style-type: none"> ▪ The design quality of a replacement along with contribution to streetscape.
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This plan was considered because:

- It is a recently developed Unitary Plan that has addressed similar issues relating to this topic; and
- The associated Council is of a scale most similar to Wellington City as a metropolitan city area.

A summary of the key findings follows:

- The approach of the Auckland Unitary Plan example is very similar to the approach proposed for the Character Precincts.
- The proposal seeks to address similar issues identified in the background work to this proposal such as managing the impacts on character from new development and from car parking and garaging.
- The Auckland Unitary Plan utilises character precinct statements which are utilised in the PDP Character Precincts Design Guide.

5.2.5 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

1. A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
2. A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
3. Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Appendix 5 – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

No specific advice has been received from Taranaki Whānui and Ngāti Toa.

5.2.6 Consultation undertaken to date

The following is a summary of the primary consultation undertaken in respect of this topic:

Who	What	When	Relevant Issues Raised
General Public	Feedback on discussion documents: <ul style="list-style-type: none"> Growth Scenarios 	April – May 2019	<ul style="list-style-type: none"> Feedback on high level growth scenario options
General Public Feedback on Draft Spatial Plan	Release of Draft Spatial Plan	August – October 2020	<ul style="list-style-type: none"> Changes to the spatial extent of character protection. Comments on growth options and impacts on character areas.
General Public Feedback on Draft Plan	Feedback on Draft Plan, through submissions and targeted discussions	November 2021	<ul style="list-style-type: none"> Changes to the spatial extent of the proposed Character Precincts. Opposition to the retention of the proposed Character Precincts entirely and implementation of NPS-UD requirements. Specific mapping changes.
Decision to notify the Proposed District Plan	When deciding to notify the Proposed District Plan, the Council agreed to character protections in the inner suburbs focused on higher quality character areas, and the removal of the blanket pre-1930s building protections. This is consistent with the approved Spatial Plan	23 June, 2022 Pūroro Āmua Planning and Environment Committee decision.	<ul style="list-style-type: none"> Extent of the Character Precincts in all of the Inner Residential Areas, and whether to extend further consistent with the officer recommended final Spatial Plan.

	<p>and the Draft District Plan. No changes were made to the objectives, policies and rules contained in the officer recommended PDP.</p> <p>Extension of the Character Precinct to include 290 Tinakori Road.</p>		
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A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in Appendix 1, including how it has been responded to in the PDP. Additional detail concerning the wider consultation undertaken in preparing the PDP is contained in the companion Section 32 Evaluation Overview Report.

In summary, the key findings arising from the consultation undertaken on this topic are:

- There are competing community views regarding the future of the existing character areas and their retention as character precincts. Those views can be broadly divided into two camps – those that value these areas for their amenity, character retention and contribution to distinctive townscapes and streetscapes; and those that see their retention as:
 - inhibiting redevelopment of these areas in line with the requirements of the NPS-UD and more recent amendments to the RMA at a time of significant housing supply constraints; and
 - retaining housing perceived as being dated, and not fit for purpose in terms of modern housing standards.
- Landowners within the existing character areas, predominantly, support the retention of the areas and value the areas for their character and resultant amenity.
- In addition to the competing opinions around the overall retention of the character areas, or their removal, there was mixed feedback regarding the extent of the proposed character precincts. Those views ranged from seeking the retention of the same extent as the existing character areas, to support for the areas as defined, to support for other options.
- Concern was also expressed around the impacts of development in areas adjoining and surrounding the proposed character precincts on the character precincts.

5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
Issue 1: Giving effect to higher order documents.	<ul style="list-style-type: none"> • The RMA and NPS-UD are directive as to where the PDP must provide for intensification in line with the MDRS provisions and 	<ul style="list-style-type: none"> • The PDP has sought to give effect to the intensification provisions of the NPS-UD and has aligned with the requirements of the RMA in respect of MDRS provisions.

	<p>requirements of Policy 3 of the NPS-UD.</p> <ul style="list-style-type: none"> • Some of the proposed character precincts fall within a 15-minute walking catchment of the City Centre Zone (as set out in the Spatial Plan and Draft District Plan, but changed to 10 minutes in the PDP), and therefore would be subject to the requirement to enable six storey development under the NPS-UD. • The MDRS provisions included in the RMA are directive on minimum residential development standards that must be provided for. • Both the NPS-UD and the RMA provide for the ability to exclude certain areas as qualifying matters. • The proposal must give effect to the RPS in respect of urban form. 	<ul style="list-style-type: none"> • The proposed character precincts need to be assessed as qualifying matters in order to be excluded from the intensification requirements of the NPS-UD and RMA. • The proposal is considered be consistent with the requirements of the RPS in respect of urban form, in particular in supporting a compact urban form.
<p>Issue 2: Existing character area protections apply to areas valued as distinctive and important townscape components</p>	<ul style="list-style-type: none"> • Feedback through consultation has identified that many Wellingtonians' value the character contribution of the existing character areas to the city. The character areas are valued and iconic aspects of the Wellington townscape. 	<ul style="list-style-type: none"> • The proposal seeks to protect areas of the most concentrated coherent character based on an assessment of character values and to exclude these areas as qualifying matters. • Outside of these areas, the PDP up-zones existing pre-1930s character areas that are not proposed as character precincts in line with the NPS-UD and MDRS requirements.
<p>Issue 3: Existing character area protections apply to areas</p>	<ul style="list-style-type: none"> • Conversely to Issue 2, the existing character areas are located in areas that are targeted by the NPS-UD as areas for intensification. 	<ul style="list-style-type: none"> • The PDP removes 71.2% of existing character protections and implements intensification requirements in line with the NPS-UD and RMA. As a consequence, 28.8% of the current

<p>that are well-located and would otherwise be required to provide for additional development capacity</p>	<ul style="list-style-type: none"> • Feedback from consultation also identified that there is strong support for intensification in these areas due their proximity to the city centre, other neighbourhood centres, amenities and services, and public transport routes. 	<p>character areas are proposed to be excluded as a qualifying matter.</p>
<p>Issue 4: The character values of the existing character areas are mixed</p>	<ul style="list-style-type: none"> • A character assessment of the existing character areas has identified that the character contribution of individual dwellings within them varies greatly. 	<ul style="list-style-type: none"> • The proposed character precincts have been delineated based on a technical assessment of character contribution of the individual sites within them. • Based on that technical assessment, further iterative work was undertaken to identify the character precincts proposed by the PDP. This is detailed further at section 9 of this report. • The character precincts attempt to capture areas of high and coherent character contribution based on this assessment.
<p>Issue 5: There is a strong presumption against the demolition of buildings within character areas in the ODP.</p>	<ul style="list-style-type: none"> • The ODP expresses a strong presumption against the demolition of buildings within the existing character precincts. • Ongoing development within character areas remains important provided it respects the character of the area and does not detract from it. 	<ul style="list-style-type: none"> • The policy approach of the proposal is to clearly outline the criteria against which demolition is to be assessed. • The proposal seeks to change the existing approach of requiring applications for demolition to seek concurrent consent for a replacement proposal as this increases cost for an applicant without providing sufficient certainty. • The proposal makes provision for ongoing development within character precincts.
<p>Issue 6: The Mt Victoria North Character Area is an important and valued townscape</p>	<ul style="list-style-type: none"> • In addition to the demolition restrictions applicable to the pre-1930 character areas, the Mt Victoria North Character Area seeks to manage the effects of new development within it in order to protect the 	<ul style="list-style-type: none"> • The PDP seeks to maintain equivalent provisions from the ODP to manage these effects. • The research report prepared in support of the development of the PDP provisions for this precinct supports the proposed approach as a means of

<p>element of the city</p>	<p>townscape values of this prominent area.</p> <ul style="list-style-type: none"> • New building works, along with additions and alterations to existing development are controlled to ensure that townscape effects are sympathetic to the important townscape contribution made by this area and its setting surrounding the St Gerard's Monastery. • The resource consent requirement for new building works in this area does not appear to act as an impediment to development occurring. 	<p>protecting a memorable and highly prominent setting.</p>
<p>Issue 7: Responding to outcomes from resource consent monitoring</p>	<ul style="list-style-type: none"> • Car parking areas and structures in front of character buildings have adverse effects on character values. • Non-notification statements are proposed, including for demolition. • There is strong demand for multi-unit proposals in the inner suburbs. 	<ul style="list-style-type: none"> • Specific provisions seek to control the placement of car parking structures. • Front boundary fencing is provided for at a reduced height. • Given the vast majority of applications are dealt with on a non-notified basis, non-notification statements are proposed to increase the certainty of a resource consent process. • The proposal recognises the importance of ongoing development within the character precincts.

6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to the objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change			✓	<ul style="list-style-type: none"> The starting point of the NPS-UD and recent RMA amendments require significant up-zoning from the status quo. Implementation of the Character Precincts and the Mt Victoria North Townscape Precinct is a discretionary choice which must be justified carefully as qualifying matters based on specific criteria.
Addresses a resource management issue		✓		<ul style="list-style-type: none"> The proposal addresses the up-zoning requirements of the NPS-UD and RMA and associated qualifying matters. Relevant Part 2 matters are also considered, in particular section 7(c) of the RMA.
Degree of shift from the status quo		✓		<ul style="list-style-type: none"> In respect of the proposed Character Precincts, the proposal represents a significant reduction in the areas over which character protection is currently in place. The proposal maintains a fundamentally similar management approach to the reduced areas proposed as Character Precincts. In respect of the Mt Victoria North Townscape Precinct, the proposal represents a similar regulatory and spatial approach as the current ODP.
Who and how many will be affected/ geographical scale of effects		✓		<ul style="list-style-type: none"> Landowners will be affected by the proposal depending on whether their property remains within or is outside of the proposed Character Precincts. The wider public will be affected by the potential for a change in character and amenity in areas where character protection no longer applies.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> Engagement with iwi/ Māori in the development of the PDP has not elicited any specific feedback relating to either the Character Precincts or the Mt Victoria North Townscape Precinct.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> The timing of the effects resulting from the removal of character protection is unknown and will likely be gradual and variable as individual landowners make decisions about their property. Removal of character protections will not necessitate demolition and/or redevelopment but will enable it. The duration of effects from either demolition or redevelopment will be permanent in terms of their impact on existing character.
Type of effects		✓		<ul style="list-style-type: none"> Positive effects will also arise from the redevelopment opportunities enabled by the change and the increase in development capacity made available by the changes. In turn this encourages more people living closer to the City centre to walk, cycle, and use public transport over private vehicle usage. This will result in less congestion and lower per capita greenhouse gas emissions. Positive effects stem from a retention of character in areas where the Character Precincts and the Mt Victoria North Townscape Precinct are proposed to apply and proposed to retain character protection. Adverse effects will result from the loss of character in areas where character protection no longer applies. The scale of that effect will depend on the assessed character values of any given property. Adverse effects may arise from the further development or redevelopment in

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				areas where character protection no longer applies.
Degree of risk and uncertainty			✓	<ul style="list-style-type: none"> The proposal is supported by a comprehensive assessment of the character contribution of each dwelling within character areas, an assessment of the Mt Victoria North Townscape Precinct and clear national direction, meaning uncertainty is low. The proposal is likely to cause tension between comprehensively giving effect to national direction for intensification and maintaining character and townscape protection. Risk associated with the proposal is accordingly considered to be high.

Overall, the scale and significance of the proposed provisions are considered to be medium for the following reasons:

- The proposal is clearly guided by national direction regarding intensification and up-zoning requirements. The identification of Character Precincts and the Mt Victoria North Townscape Precinct must be proposed and assessed as qualifying matters under the NPS-UD and RMA.
- The proposed regulatory approach fundamentally continues the status quo, with the principal change relating to the area extent where character protection applies.
- Iwi feedback on the PDP has not raised any comments or concerns relating to the Character Precincts or the Mt Victoria North Townscape Precinct.
- The likely type of effects are known and the proposal is based on a comprehensive technical assessment.

Consequently, a detailed evaluation of these provisions, with particular reference to an assessment of the provisions as qualifying matters, has been identified as appropriate for the purposes of this report.

6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Based on the assessment of the scale and significance of the proposed provisions in section 6.1, specific quantification of all benefits and costs in this report is considered neither necessary, beneficial nor practicable in relation to this topic for the following reasons:

- Quantifying the costs and benefits relating to demolition or redevelopment is subject to site specific circumstances, design choices and the circumstances of individual landowners. It would also be subject to a range of various market conditions such as

property values, interest rates and construction costs that change over time. It would not be practical to undertake a detailed development feasibility exercise on all properties within the existing character areas. Nor would such an approach be appropriate as a 'point in time' assessment given the variables outlined above.

- Quantifying the costs and benefits of either maintaining or losing character values, or impacts on townscape values, is highly subjective and open to challenge.

Instead, this report identifies more generally where any additional costs or cost may lie. As discussed at Section 9.0, the potential impacts of the proposal on development capacity have been quantified to inform this analysis.

7.0 Zone Framework

Based on the issues analysis in section 5.3 of this report and the National Planning Standard zone options set out in section 4.4.5 the following zone framework has been selected in relation to this topic:

Zone	Reason/s
Medium Density Residential Zone: Character Precincts Mt Victoria North Townscape Precinct	<ul style="list-style-type: none"> • The Medium Density Residential Zone has been selected as the appropriate zone to give effect to the requirements of the NPS-UD and the MDRS standards of the RMA. This is further considered in the section 32 evaluation report for the Medium Density Residential Zone. • The selection of a 'precinct' approach is directed by the spatial layers standard of the National Planning Standards. This directs that precincts are utilised where "additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone."

Appendices 3 and 4 contain maps showing the extent of the proposed Character Precincts and the Mt Victoria North Townscape Precinct.

8.0 Overview of Proposals

The proposed provisions relevant to these topics are set out in detail in the ePlan and should be read in conjunction with this evaluation report.

In summary, the proposed provisions include:

- Definitions
 - A set of relevant definitions:
 - Accessory building
 - Character
 - Demolition
 - Pre-1930 Building
 - Primary Elevation
 - Primary Form
 - Streetscape
 - Townscape
- One objective (MRZ-PREC01-O1) relating to the Character Precincts which seeks that character precincts are managed to:

- Minimise the further erosion of their character;
- Provide for their ongoing use and development that maintains or enhances their character; and
- Ensure development within a Precinct recognises and responds to the character of the Precinct.
- Six policies (MRZ-PREC01-P1 to P6) that:
 - Seek to maintain the character of the Character Precincts by seeking that development has regard to and responds positively to the character values of the relevant precinct;
 - Restrict the demolition of pre-1930 buildings except in particular circumstances;
 - Support ongoing intensification provided that it does not detract from the character of the precincts;
 - Support the ongoing use, repair and maintenance of buildings within character precincts;
 - Guide the design and location of car parking areas and structures; and
 - Support the retention of special features that contribute to the character of an area.
- One objective (MRZ-PREC01-O2) relating to the Mt Victoria North Townscape Precinct which seeks that:
 - The area is recognised as a townscape precinct;
 - The precinct is managed to maintain the landscape setting of the area and associated townscape values; and
 - Development in the precinct is enabled and recognises and responds to the townscape values of the precinct.
- One policy (MRZ-PREC01-P1) that guides development in the precinct. Specifically, the policy seeks that development in the precinct have regard and respond to the townscape values of the precinct and consider:
 - The design, location, bulk scale and height of new development;
 - Landscaping, parking areas, vehicle manoeuvring and site access; and
 - The extent to which the development makes a positive contribution to the predominant development pattern and relationship to St Gerard's Monastery.
- A rule framework that manages land use activities as per the underlying Medium Density Residential zone.
- Specific rules and standards relating to building and structure activities:
 - Building and structure activities in Character Precincts:
 - The maintenance and repair of buildings and structures as a permitted activity (MRZ-PREC01-R1);
 - The construction of accessory buildings as a permitted activity subject to standards, and a restricted discretionary activity where standards aren't met (MRZ-PREC01-R2);
 - The demolition of buildings and structures as a permitted activity (MRZ-PREC01-R3);
 - The demolition of a building, or part of a building, but excluding an accessory building, constructed prior to 1930 as a restricted discretionary activity (MRZ-PREC01-R4);

- The construction, addition and alteration of residential buildings as a restricted discretionary activity (MRZ-PREC01-R5);
 - The construction of fences and standalone walls are a permitted activity (subject to standards), and a restricted discretionary activity where standards aren't met (MRZ-PREC01-R6); and
 - The construction of buildings and structures on or over legal road as a restricted discretionary activity (MRZ-PREC01-R7).
 - Building and structure activities in the Mt Victoria North Townscape Precinct:
 - The maintenance and repair of buildings and structures as a permitted activity (MRZ-PREC02-R1);
 - The demolition or removal of buildings and structures as a permitted activity (MRZ-PREC02-R2);
 - The construction, addition or alteration of any buildings or structures as a restricted discretionary activity (MRZ-PREC02-R3);
 - The construction of fences and standalone walls as a permitted activity (subject to standards), and as a restricted discretionary activity where standards aren't met (MRZ-PREC02-R4); and
 - The construction of buildings and structures on or over legal road as a restricted discretionary activity (MRZ-PREC02-R5).
- A complementary set of effects standards:
 - As for the underlying Medium Density Residential Zone standards, except for:
 - MRZ-PREC01-S1 which restricts the height of front boundary fences to 1 metre; and
 - MRZ-PREC01-S2 which limits the height of an accessory building to 3.5 metres.
- Supporting Design Guides:
 - Residential Design Guide – Character Precincts Appendix
 - The Design Guide describes its applicability and outlines a separate section for each Character Precinct, describing the character of that area, patterns of development and design responses within that precinct.
 - Residential Design Guide – Mt Victoria North Townscape Precinct Appendix
 - The Design Guide describes its applicability and the characteristics and patterns of development of the Mt Victoria North Townscape Precinct in order to inform design responses.

9.0 Qualifying Matters

Section 77G(1) of the RMA requires that the Council incorporate the MDRS provisions into every relevant residential zone. Section 77G(2) also requires that every residential zone in a Tier 1 urban environment gives effect to Policy 3 of the NPS-UD. These requirements are further described in the Part 1 Section 32 evaluation and in the Section 32 evaluation for the Medium Density Residential Zone.

Section 77I then provides for the Council to make the requirements of the MDRS and Policy 3 of the NPS-UD less enabling, where any one or more of a range of specified 'qualifying matters' apply. Section 77I(j) provides for:

Any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area, but only if section 77L is satisfied.

It is proposed to exclude the Character Precincts and the Mt Victoria North Townscape Precinct as qualifying matters from the requirements of Section 77G.

For the purposes of preparing this evaluation report for the Character Precincts and the Mt Victoria North Townscape Precinct, Council is required, under section 77J(2) of the RMA, to satisfy the following in relation to applying a less permissive approach to medium density development in an area to accommodate any qualifying matter to which section 77I(j) applies:

- (a) To demonstrate why –
 - (i) it considers that the area is subject to a qualifying matter; and
 - (ii) the qualifying matter is incompatible with the level of development permitted by the Medium Density Residential Standards (MDRS) or as provided for by policy 3 of the NPS-UD for that area; and
- (b) Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- (c) Assess the costs and broader impacts of imposing those limits; and
- (d) Include –
 - (i) a description of how the provisions of the district plan are consistent with the specified development outcomes;
 - (ii) a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters, and in particular how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—
 - (A) any operative district plan spatial layers; and
 - (B) any new spatial layers proposed for the district plan.

Further to this, under section 77L of the RMA the evaluation report is also required to address the following:

- (a) Identify the specific characteristic that makes the level of development provided by the MDRS inappropriate in the area; and
- (b) Justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD; and
- (c) Include a site-specific analysis that –
 - (i) identifies the site to which the matter relates; and
 - (ii) evaluates the specific characteristic on a site-specific basis to determine the geographic area where intensification needs to be compatible with the specific matter; and
 - (iii) evaluates an appropriate range of options to achieve the greatest heights and densities permitted by the MDRS while managing the specific characteristics.

Within the spatial extent of the area covered by these topics, 30³ separate areas have been identified as subject to a qualifying matter for the purposes of section 77I(j) and identified as Precincts. These include:

- The following Character Precincts:
 - Five Character Precincts within Aro Valley;
 - One Character Precinct within Kelburn;

³ The Mt Victoria North Townscape Precinct overlaps with one of the proposed Mt Victoria Character Precincts.

- Five Character Precincts within Berhampore;
- Five Character Precincts within Mt Victoria;
- Four Character Precincts within Newtown;
- Five Character Precincts within Thorndon; and
- Four Character Precincts within Mt Cook.
- The spatial extents of the proposed Character Precincts are shown in Appendix 3 and are contrasted against the extent of the existing Character Areas.
- The Mount Victoria North Townscape Precinct being one contiguous area as shown in Appendix 4;

An evaluation setting out how these areas meet the requirements outlined above is set-out in the following sections.

9.1 Character Precincts

As noted in outlining the background to the existing pre-1930 character areas, this evaluation has highlighted the value placed on these areas as important and sometimes iconic elements of the Wellington townscape and streetscape. They are valued for their inherent character and the resultant amenity they create.

In developing the proposed Character Precincts, the Council commissioned a comprehensive assessment of the existing pre-1930 character areas contained in the ODP. This assessment sought to better understand the character of these areas at a fine-grained level. The Pre-1930 Character Area Review (2019) undertook a site-by-site assessment of the approximately 5,500 properties contained within the current pre-1930 character areas.

That assessment categorised each of these properties as either:

- Primary (buildings that define the character of the area);
- Contributory (buildings with attributes that support the character of the area);
- Neutral (buildings with attributes that neither define, support nor detract from the character of the area); and
- Detractive (buildings with attributes that undermine or detract from the character of the area).

The review found that 74% of all buildings were either primary or contributory in terms of their character.

Character Contribution	Number/Percentage of Total Properties		
	<i>Pre-1930</i>	<i>Post-1930</i>	<i>Total</i>
<i>Primary</i>	2213 (40%)	35 (1%)	2248 (41%)
<i>Contributory</i>	1849 (34%)	156 (3%)	2005 (37%)
<i>Neutral</i>	405 (7%)	488 (9%)	893 (16%)
<i>Detractive</i>	40 (1%)	306 (5%)	346 (6%)

Figure 1. Character contribution of assessed dwellings in existing pre-1930 character areas. Pre-1930 Character Area Review 2019 (Boffa Miskell Ltd) p. 10.

This assessment showed a high level of character contribution from dwellings within these areas. A graphic representation of this is shown in Appendix 3 depicting the individual classification of each site.

The Boffa Miskell assessment has been utilised as the basis for identifying the proposed Character Precincts. Appendix 4 of the assessment identified 'Indicative Character Contribution Sub-Areas'. These were areas where concentrations of primary and contributory buildings were identified through the assessment. From this initial classification, further evaluation was then undertaken to identify the Character Precincts as proposed within the PDP. This evaluation is described below.

In undertaking this further evaluation, a streetscape approach was adopted. This approach focussed on rows or groupings of buildings with concentrations of noticeable character that are oriented towards the street or were public-facing. Noticeable character related to concentrations of primary or contributory buildings, acknowledging that in any given area, the degree of character contribution of any dwelling was variable. The evaluation therefore looked for concentrated areas of consistent character.

The identified 'Indicative Character Contribution Sub-Areas' in the Boffa Miskell assessment were compared to 'sub-areas' identified within the existing Residential Design Guide and Character Area Design Guide in the ODP. Areas that did not incorporate a streetscape approach or that lacked significant concentrations of primary and contributory buildings were not included in this initial assessment.

From this, a streetscape approach was used to create initial boundaries for the Character Precincts. The character of these buildings was then further considered with reference to the concentration of character within them, coupled with site visits. Areas with high concentrations of character (i.e. areas with a predominance of primary classified buildings) were then delineated to create the proposed Character Precincts as proposed in the PDP.

The Boffa Miskell assessment and subsequent evaluation of that work has shown that the areas assessed contain significant concentrations of pre-1930 buildings. The assessment has further shown that these areas maintain a resultant character that is defining of these areas. Incorporation of the MDRS provisions, and the requirements of Policy 3 of the NPS-UD could result in an erosion of that character by removing demolition controls and enabling development that may be incompatible with the character of these areas. Resultingly, maintaining the character of these areas is considered to be a qualifying matter and that providing for the requirements of the MDRS and Policy 3 is incompatible with these areas.

In undertaking this review, and proposing these areas as qualifying matters, it is noted that the PDP significantly reduces the current extent of pre-1930 character areas by 71.2% overall. The current District Plan maintains demolition controls over 307.1 hectares and this would be reduced to 88.3 hectares. Considering the existing character areas individually, the proposed reduction in each area is as follows:

Area	Reduction in area of character protection
Thorndon	58.5% (44ha to 18.2ha)
Mt Victoria	62.1% (49.8ha to 18.9ha)
Mt Cook	57.6% (26.4ha to 11.2ha)
Newtown	73.2% (93.9ha to 25.2ha)
Berhampore	84.5% (47.6ha to 7.4ha)
Aro Valley	73% (27.6ha to 7.5ha)
Holloway Road	100% (12.3ha to 0ha)
The Terrace	100% (5.6ha to 0ha)
Total	71.2% (307.2 to 88.7)

Areas where demolition controls are proposed to be removed will be zoned in accordance with the provisions of the MDRS and Policy 3.

Areas where Character Precincts are proposed and that are not proposed for 'up-zoning' in line with the MDRS and Policy 3 still nevertheless provide for increased development, but do not do so as a permitted activity. The driver of the Character Precincts is not to preclude development, rather it is to maintain the coherent high pre-1930 character of these areas by restricting demolition of those existing buildings. Infill development or redevelopment is provided through a resource consent process.

The proposed provisions applicable to the Character Precincts have been aligned with the standards provided for through the MDRS. The resultant development form therefore is consistent with this requirement.

Overall, the proposed Character Precincts are significantly reduced from the current extent of the existing pre-1930 character areas in the ODP. Where Character Precincts are proposed, they have been delineated based on a comprehensive assessment of the existing pre-1930 character areas and by focussing on areas of high concentrated character. PDP provisions relating to bulk and location have been aligned with the provisions of the MDRS.

9.2 Mt Victoria North Townscape Precinct

The Mt Victoria North Townscape Precinct seeks to 'roll-over' the existing Mt Victoria North Character Area from the ODP, with the same boundaries being proposed in the PDP. It is noted that a large portion of the proposed Townscape Precinct is also subject to a proposed Character Precinct notation, thereby not significantly increasing the overall area that is proposed to be excluded as a qualifying matter.

The Mt Victoria North Townscape Precinct is concerned with protecting the visual impacts of development on an iconic Wellington townscape overlooking the city. The basis for proposing the precinct has been reviewed by an assessment of the precinct provided in support of this evaluation.

That assessment notes that the basis for the precinct is underpinned by its planning history and the “undisputed townscape significant” of the precinct. The assessment further comments:

“According to the DDP (MRZ-PREC02) the importance of the Mt Victoria North Townscape Precinct is based on its ‘high visibility and proximity to St Gerard’s Monastery and escarpment below’.

The townscape values within the precinct which the DDP seeks to manage are derived from a set of distinctive elements/character attributes and the relationship between them, which together create a memorable and highly prominent townscape setting. These elements include the area’s expressive topography, St Gerard’s Monastery and the green escarpment below, and the collection of houses within the Mt Victoria North area, most of which were built prior to 1930 on long narrow sections. Following the underlying topography, these houses share a common built form and orientation creating a distinctive building pattern. The area’s proximity to the harbour increases its visibility, making it a prominent feature in many views from across the central city and the waterfront.

One of the area’s defining character attributes is the large number of pre-1930’s buildings with consistent character. The character value of these buildings, and their contribution to the broader streetscape character, is acknowledged and managed in the DDP through the identified Mt Victoria North Character Precinct. However, the townscape precinct does not seek to protect historic or heritage values. Its main focus is on the collective identity of the area and associated townscape values.”

The assessment has considered the proposed spatial extent of the precinct and found it to be appropriate. The assessment suggests minor potential additions to the precinct. These have not been included at this point, and instead the precinct boundaries proposed are those agreed to by the Council in the development of the Draft and Proposed District Plans.

As noted in section 8 above, the proposed rules relating to the Mt Victoria North Townscape Precinct differ to those applicable to Character Precincts, by requiring any new building or addition and alteration to an existing building to be approved through a resource consent. This requirement is cognisant of the townscape value of the precinct

As for the Character Precincts, the proposed bulk and location provisions adopt the provisions of the MDRS.

9.3 Development Capacity Impacts

Policy 2 of the NPS-UD requires the Council to provide for at least sufficient development capacity to meet expected demand for housing over the short, medium and long term. The Part 1 section 32 evaluation provides an overall assessment of how the PDP addresses the requirements of the NPS-UD.

Section 771 then requires the Council to assess the impacts of limiting development capacity through qualifying matters.

NOTE: At date of publication the Council is awaiting a detailed assessment that meets and goes beyond the requirements of 77K and 77Q of the RMA to demonstrate the net effect of each qualifying matter on the provision of development capacity, including those new scheduled items that are not currently scheduled in the operative district plan.

This report will be published approximately August 2022 and made publicly available to support this section 32 report.

10.0 Evaluation of Proposed Objective

10.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objective along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

10.2 Evaluation of Objectives MRZ-PREC01-O1 and MRZ-PREC02-O1

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objective is the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered three potential objectives:

1. The proposed objective
2. The current most relevant objective – the status quo
3. A reasonable alternative objective – no specific objective i.e. the removal of character protection and the Mt Victoria North Townscape Precinct, and reliance on the underlying Medium Density Zone.

Proposed objective MRZ-PREC01-O1:

Character Precincts are managed to:

1. Minimise the further erosion of their character;
2. Provide for their ongoing use and development that maintains or enhances their character; and
3. Ensure development within a Precinct recognises and responds to the character of the Precinct.

General intent:

The objective outlines the District Plan’s approach to character protection and the outcome sought through the implementation of Character Precincts.

Other potential objectives

Status quo: Objective 4.2.2 To recognise and enhance those characteristics, features and areas of the Residential Area that contribute positively to the City’s distinctive physical character and sense of place.

Alternative: No specific objective relating to character protection.

	Preferred objective	Status quo	Alternative
Relevance:			
Addresses a relevant resource management issue	The proposed objective addresses the protection of areas of concentrated and cohesive residential character which are valued by the community.	The existing objective is a more general objective applicable to the residential areas as a whole. It addresses relevant resource management issues relating to character and amenity but without the specificity of the proposed objective. The explanatory text to the current objective provides detail regarding pre-1930 demolition controls.	The absence of an objective would preclude the protection of character precincts. This is an option under the NPS-UD and RMA to not utilise qualifying matters as a means to restricting intensification requirements in these areas.
Assists the Council to undertake its functions under s31 RMA	The proposed objective assists the Council in achieving its functions under section 31(1)(a) of the Act regarding the	The existing objective would assist the Council to undertake its functions in part, but it does not specifically address the	The Council would still be achieving its functions under this option, particularly in providing for additional development capacity.

	<p>integrated management of the effects of land use, development and the protection of character within the identified character precincts.</p> <p>The response of this objective to the Council's function under section 31(1)(a) needs to be balanced against its function under section 31(1)(aa) whereby the Council needs to ensure sufficient development capacity is being provided for. The assessment undertaken through the Part 1 section 32 evaluation and at Section 9 of this report has confirmed that there is sufficient development capacity being enabled by the PDP.</p> <p>The objective is accordingly considered to assist the Council in achieving its functions under s31 of the Act.</p>	<p>character areas but rather addresses matters of character and amenity in more general terms.</p>	<p>This option would not achieve the integrated management of the effects of land use in respect of the identified and assessed character values in these areas.</p>
<p>Gives effect to higher level documents</p>	<p>The relevant higher-level documents are the NPS-UD, along with the RPS.</p> <p>As assessed in section 9, the Character Precincts are proposed as a qualifying matter under the NPS-UD and RMA in respect of the MDRS and NPS-UD Policy 3 requirements. In this respect, the proposed Character Precincts</p>	<p>This option would give effect to the NPS-UD by broadly referring to matters that can be considered as qualifying matters.</p>	<p>This option would give effect to the NPS-UD and RMA by providing the most direct application of the intensification requirements of Policy 3 and the MDRS.</p>

	<p>align with the ability provided by the NPS-UD and RMA to exclude areas from the intensification requirements of Policy 3 and the MDRS provisions. The assessment required to support this exclusion has been undertaken in section 9 of this evaluation report.</p> <p>The analysis undertaken as part of the Part 1 Section 32 evaluation has shown that the proposed District Plan is providing for sufficient development capacity to meet the requirements of the NPS-UD. Given that this key requirement of the NPS-UD is being met, it is considered that the objective gives effect of the NPS-UD in respect of appropriately assessed qualifying matters.</p> <p>The proposal supports the relevant urban form provisions of the Regional Policy Statement.</p>		
Usefulness:			
Guides decision-making	The objective provides direction to decision-makers on the outcomes sought for character precincts.	Yes, but the existing objective lacks the clear direction provided by the proposed objective.	Not applicable.
Meets best practice for objectives	Yes. The objective is clear in specifying the outcomes sought for character precincts.	No. The objective is more generic than the proposed objective in its application.	Not applicable.
Reasonableness:			

Will not impose unjustifiably high costs on the community/parts of the community	The objective will impose costs on property owners by restricting demolition in certain areas, and requiring a resource consent for new development. This cost is considered to be reasonable in achieving the outcomes of the proposed objective.	The objective will impose costs on property owners by restricting demolition in certain areas, and requiring a resource consent for new development. This cost is considered to be reasonable in achieving the outcomes of the proposed objective.	This option would impose costs through the likely gradual erosion of character values as a result of an absence of character protection.
Acceptable level of uncertainty and risk	The objective is based on comprehensive analysis of the character values of the proposed precincts.	The existing objective is uncertain in its generic application and would be open to challenge through its application to areas where character values have been assessed to be less coherent.	By not protecting the character of the existing character areas, there is a high level of risk that their character will erode over time.
Achievability:			
Consistent with identified tangata whenua and community outcomes	Yes. The Council has sought to identify character precincts within which to restrict demolition in order to protect the character of these areas. There are various community views on the merits of such protection and the area over which such protection should be applied.	Yes. The Council has sought to identify character precincts within which to restrict demolition in order to protect the character of these areas. There are various community views on the merits of such protection and the area over which such protection should be applied.	In part. Not providing an objective relating to character protection would not be consistent with community views that support the retention of character protection over existing character areas, either in whole or in part.
Realistically able to be achieved within the Council's powers, skills and resources	Yes. The Council is able to identify these areas as qualifying matters, assess their appropriateness and protect their character through the PDP.	Yes. The Council is able to identify these areas as qualifying matters, assess their appropriateness and protect their character through the PDP.	Yes. The Council is free to not pursue character protection in the character precincts as they are a discretionary choice as qualifying matters.
Summary			
The proposed objective (and associated provisions discussed below) seeks to protect the character values of identified character precincts while providing for their ongoing development and use. The objective clearly articulates the specific outcomes sought for the identified Character Precincts.			

Proposed objective MRZ-PREC02-O1:			
The area around St Gerard's Monastery in the northern portion of Mt Victoria and western portion of Oriental Bay is:			
<ol style="list-style-type: none"> 1. Recognised as a townscape precinct; 2. Managed to maintain or enhance the iconic landscape setting and townscape values; 3. Developed in a manner that recognises and responds to the townscape values of the area; and 4. Enabled for its ongoing use and appropriate future development. 			
General intent:			
The objective identifies the Mt Victoria North area as an important townscape element that will be managed as a precinct, that its ongoing use and development is provided for, and that development in the area is responsive to the townscape values of the area.			
Other potential objectives			
Status quo: Objective 4.2.2 To recognise and enhance those characteristics, features and areas of the Residential Area that contribute positively to the City's distinctive physical character and sense of place.			
Alternative: No specific objective relating to character protection.			
	Preferred objective	Status quo	Alternative
Relevance:			
Addresses a relevant resource management issue	The proposed objective addresses the townscape importance of the proposed precinct and how its visual prominence and importance necessitates particular management requirements.	The existing objective is a more general objective applicable to the residential areas as a whole. It addresses relevant resource management issues relating to character and amenity but without the specificity of the proposed objective. The explanatory text to the current objective provides detail regarding the Mt Victoria North character area.	The absence of an objective would preclude specific management of this area. This is an option under the NPS-UD and RMA to not utilise qualifying matters as a means to restricting intensification requirements in this area.
Assists the Council to undertake its functions under s31 RMA	The proposed objective assists the Council in achieving its functions under section 31(1)(a)	The existing objective would assist the Council to undertake its functions in part, but it does	The Council would still be achieving its functions under this

	<p>of the Act regarding the integrated management of the effects of land use, development and the protection of townscape values within the precinct.</p> <p>The response of this objective to the Council's function under section 31(1)(a) needs to be balanced against its function under section 31(1)(aa) whereby the Council needs to ensure sufficient development capacity is being provided for. The assessment undertaken through the Part 1 Section 32 evaluation and at Section 9 of this report has confirmed that there is sufficient development capacity being enabled by the PDP.</p> <p>The objective is accordingly considered to assist the Council in achieving its functions under s31 of the Act.</p>	<p>not specifically address the townscape values of this area but rather addresses matters of character and amenity in more general terms.</p>	<p>option, particularly in providing for additional development capacity.</p> <p>This option would not achieve the integrated management of the effects of land use in respect of the identified townscape values of this area.</p>
<p>Gives effect to higher level documents</p>	<p>The relevant higher-level documents are the NPS-UD, along with the RPS.</p> <p>As assessed in section 9, the Mt Victoria North Townscape Precinct is proposed as a qualifying matter under the NPS-UD and RMA in respect of the MDRS and NPS-UD Policy 3 requirements. In this respect, the</p>	<p>This option would give effect to the NPS-UD by broadly referring to matters that can be considered as qualifying matters.</p>	<p>This option would give effect to the NPS-UD and RMA by providing the most direct application of the intensification requirements of Policy 3 and the MDRS.</p>

	<p>proposed precinct aligns with the ability provided by the NPS-UD and RMA to exclude areas from the intensification requirements of Policy 3 and the MDRS provisions. The assessment required to support this exclusion has been undertaken in section 9 of this evaluation report.</p> <p>The analysis undertaken as part of the Part 1 Section 32 evaluation has shown that the PDP is providing for sufficient development capacity to meet the requirements of the NPS-UD. Given that this key requirement of the NPS-UD is being met, it is considered that the objective gives effect to the NPS-UD in respect of appropriately assessed qualifying matters.</p> <p>The proposal supports the relevant urban form provisions of the Regional Policy Statement.</p>		
<i>Usefulness:</i>			
Guides decision-making	Yes. The objective provides direction to decision-makers on the outcomes sought for the Mt Victoria North Townscape Precinct.	Yes, but the existing objective lacks the clear direction provided by the proposed objective.	Not applicable.
Meets best practice for objectives	Yes. The objective is clear in specifying the outcomes sought for the precinct.	No. The objective is more generic than the proposed objective in its application.	Not applicable.
<i>Reasonableness:</i>			

Will not impose unjustifiably high costs on the community/parts of the community	The objective will impose costs on property owners by requiring a resource consent for new development. This cost is considered to be reasonable in achieving the outcomes of the proposed objective.	The objective will impose costs on property owners by requiring a resource consent for new development. This cost is considered to be reasonable in achieving the outcomes of the proposed objective.	This option would impose costs through the likely gradual erosion of townscape values as a result of ongoing development that is not subject to an assessment of townscape impacts.
Acceptable level of uncertainty and risk	The objective is based on comprehensive analysis of the townscape values of the proposed precinct.	The existing objective is uncertain in its generic application.	By not protecting the townscape values of this area, there is a high level of risk that these values will erode over time.
Achievability:			
Consistent with identified tangata whenua and community outcomes	Yes. The Council has sought to maintain townscape protection within this area by requiring resource consent to for new development in order to assess its impacts on townscape values. The area is valued by the community as a well-known townscape element.	Yes. The Council has sought to maintain townscape protection within this area by requiring resource consent to for new development in order to assess its impacts on townscape values. The area is valued by the community as a well-known townscape element.	No. Not providing an objective relating to the protection of the townscape values of this area would not be consistent with community views that value the townscape of this area.
Realistically able to be achieved within the Council's powers, skills and resources	Yes. The Council is able to identify this area as a qualifying matter, assess its appropriateness and protect the townscape values of the area through the PDP.	Yes. The Council is able to identify this area as a qualifying matter, assess its appropriateness and protect the townscape values of the area through the PDP	Yes. The Council is free to not pursue townscape protection in this area as it is a discretionary choice as a qualifying matter under the NPS-UD and RMA.
Summary			
The proposed objective (and associated provisions discussed below) seeks to protect the townscape values of identified precinct while providing for its ongoing development and use. The objective clearly articulates the specific outcomes sought for the identified Mt Victoria North Townscape Precinct.			

11.0 Evaluation of Reasonably Practicable Options and Associated Provisions

11.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

11.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

11.3 Provisions to achieve Objective MRZ-PREC01-O1 and MRZ-PREC02-O1

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo
3. Removing character protections

Objective MRZ-PREC01-O1:			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u></p> <p>MRZ-PREC01-P1, MRZ-PREC01-P2, MRZ-PREC01-P3, MRZ-PREC01-P4, MRZ-PREC01-P5 and MRZ-PREC01-P6</p> <p>MRZ-PREC01-P1 addresses the maintenance of character within the Character Precincts.</p> <p>MRZ-PREC01-P2 provides for restrictions on the demolition of buildings constructed prior to 1930.</p> <p>MRZ-PREC01-P3 provides for the ongoing intensification of Character Precincts provided that the character of the area is not detracted from.</p> <p>MRZ-PREC01-P4 provides for the ongoing repair and maintenance of buildings in the Character Precincts.</p> <p>MRZ-PREC01-P5 addresses car parking, garaging and accessory buildings, and their location on the site, supporting rule MRZ-PREC01-R2 and standard MRZ-PREC01-S2.</p> <p>MRZ-PREC01-P6 relates to the protection of special features.</p> <p>Land Use Activities Rules:</p> <p>As per the Medium Density Residential Zone.</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • Under the proposal, restrictions are proposed on the demolition of buildings built prior to 1930 within the identified Character Precincts. • These restrictions potentially foreclose development opportunities that may, of themselves, provide for positive environmental effects through their design and contribution to the character and amenity of the area. • The proposal reduces the area over which demolition controls apply from their current extent. This is a cost relative to the extent of areas currently protected and the potential for some loss of character in areas of a lesser concentration of consistently high character that would no longer be protected. <p><i>Economic</i></p> <p>The economic costs of this option relate to:</p> <ul style="list-style-type: none"> • The opportunity cost of precluding the redevelopment of sites with character protection beyond what is provided for within the Character Precincts; and • The imposition of costs related to resource consent processes for development that exceeds what is provided for by the District Plan. • In the absence of the proposed Character Precincts, the affected areas would otherwise be up-zoned in line with the requirements of the NPS-UD, as are the surrounding areas within the MDRZ. The likelihood of redevelopment occurring if the areas were not protected will be dependent on a number of factors including individual landowner decisions, property values, the quality of the existing house and site area among a range of variables. Therefore, the cost of precluding development through demolition protection does not mean that redevelopment of all of the sites 'protected' would occur, nor can a specific timeframe be placed on when the redevelopment potential may be taken up. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • Restrictions on demolition will ensure that, unless the policy criteria that provide for demolition are met, that existing building stock will be maintained. • This will have a positive environmental effect in maintaining the existing residential character within the Character Precincts. That positive effect relates to the character and resultant amenity of these areas, as they are perceived both immediately and from wider streetscape views. • There are also environmental benefits from the retention of the physical resource that is the existing built housing stock in these areas. <p><i>Economic</i></p> <ul style="list-style-type: none"> • Whilst unquantified, there may be benefits to property values resulting from the character protections, and resultant amenity values in the Character Precincts as compared to neighbouring areas. • There may also be wider benefits to the city from the inherent value of the character areas. Again, this is unquantified and likely to be marginal. • Economic benefits resulting from the reduction of the extent of character protection relate to the increased development capacity offered by the areas over which protection is removed. Coupled with a rezoning to the proposed MDRZ which enables a higher degree of development potential, this option contributes to the amount of plan enabled capacity that will be available. • The proposal will reduce the economic costs of seeking a resource consent to demolish an existing building by not requiring such an application to be accompanied by a replacement proposal. <p><i>Social</i></p> <ul style="list-style-type: none"> • Social benefits from the proposal result from the protection of the Character Precincts and their positive effects on character and amenity. These benefits principally accrue locally to immediate residents, with lesser benefits to visitors to the area and those passing through. These benefits relate to the importance placed 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> • The proposed changes are informed and supported by a comprehensive analysis of the character contribution of each dwelling within the proposed character areas. • The approach proposed is consistent with the ability to identify these areas under the qualifying matters provisions of the NPS-UD and RMA.

<p>Building and Structure Activities Rules:</p> <p>MRZ-PREC01-R1 – Maintenance and repair of buildings and structures – Permitted Activity.</p> <p>MRZ-PREC01-R2 - Construction, addition, and alteration of accessory buildings – Permitted Activity.</p> <p>MRZ-PREC01-R3 – Demolition or removal of buildings and structures – Permitted Activity.</p> <p>MRZ-PREC01-R4 - Demolition of any building or part of any building, excluding accessory buildings, constructed prior to 1930 – Restricted Discretionary Activity.</p> <p>MRZ-PREC01-R5 - Construction, addition or alteration of any buildings or structures, excluding accessory buildings – Restricted Discretionary Activity.</p> <p>MRZ-PREC01-R6 – Fences and standalone walls – Permitted Activity.</p> <p>MRZ-PREC01-R7 – Buildings and structures on or over legal road – Restricted Discretionary Activity.</p> <p>Standards:</p> <p><u>As per the Medium Density Residential Zone.</u></p> <p>Other Methods:</p> <p>MRZ-PREC01-S1 – Fences and standalone walls</p>	<ul style="list-style-type: none"> • There will be costs incurred by landowners and/or developers in engaging in the resource consent process to undertake changes beyond what is provided for by the District Plan. These costs are considered to be acceptable relative to the benefits of the proposal in achieving the objective. <p>Social</p> <ul style="list-style-type: none"> • Social costs relate to: <ol style="list-style-type: none"> 1. Additional restrictions placed on landowners to re-develop their property. 2. Restrictions on the redevelopment of the areas to the extent that would otherwise be enabled by the NPS-UD. This will have the effect of reducing the otherwise available plan enabled development capacity provided for by the underlying zoning. • In respect of (1), the proposed provisions envisage a degree of additional development occurring within the Character Precincts as outlined in this report. Principal restrictions fall on the demolition of existing buildings and a resource consent requirement for the construction of new buildings (excluding accessory buildings) to ensure their contribution to maintaining the character of these areas. Ongoing infill development is provided for. • It is considered that the proposed provisions strike an appropriate balance in achieving the purpose of the proposed objective, and providing for appropriate development to continue to occur. • The restrictions, and bulk and location standards that provide for a lesser degree of built form as compared to the underlying MDRZ are commensurate with the character that the proposed Plan is seeking to protect. Again, this is considered to be appropriate in order to achieve the applicable objective. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified. 	<p>on these areas by the community in providing Wellington with a sense of place and identity as identified through the consultation undertaken on this topic area.</p> <ul style="list-style-type: none"> • Social benefits also arise from the greater development capacity being enabled through the reduction in the overall extent and the number of properties subject to character protection. This will enable a greater amount of plan enabled development capacity which will increase the amount of development that is eventually realised and therefore result in an increase in overall housing supply over time. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect benefits have been identified. 	
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<p>MRZ-PREC01-S2 – Maximum height of an accessory building</p> <p>Residential Design Guide – Character Precincts</p>			
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed policies, rules and standards specific to the Character Precincts, are considered to be effective in achieving the applicable objective. The proposed provisions are similar to the ODP provisions which have been shown to be effective in maintaining the character of the existing pre-1930 character areas. They have been aligned with the standards of the MDRS to achieve the intent of those provisions as much as possible and to ensure consistency in the application of the PDP.</p> <p>Character will be maintained through the restrictions placed on the demolition of existing buildings and the resource consent process required for new building development. Assessment of new development against applicable design guidance will ensure that new development maintains or enhances the character of the relevant precinct. The effectiveness of this approach is a continuation of the existing ODP as summarised in this evaluation, relative to the regulatory impost of the proposed provisions.</p>		<p><i>Efficiency</i></p> <p>The proposed provisions are efficient in their primary purpose of maintaining character. They achieve this through a regulatory approach to the demolition of existing pre-1930 buildings and the construction of new buildings.</p> <p>This is fundamentally a continuation of the existing approach of the ODP. Consideration of both resource consent applications processed under the current District Plan, and of pre-application meeting records, suggests that resource consents are overwhelmingly granted and that few consents for demolition are sought.</p> <p>As compared to the current ODP approach, the proposed provisions seek to remove the existing requirement for a replacement proposal to be developed and considered in parallel with an application for demolition. This change is considered to improve the efficiency of the regulatory approach and to reduce the economic burden of engaging with the resource consent process.</p> <p>Rule MRZ-PREC01-R5 relating to the construction of new residential buildings provides for a public notification preclusion to improve the efficiency of this rule. An equivalent notification preclusion is proposed for rule MRZ-PREC01-R4.</p>
<p><u>Overall evaluation</u></p>	<p>This is the most appropriate approach to achieve the objective.</p> <p>The proposed provisions seek to strike an appropriate balance between the maintenance of character in areas where character protections are considered to be justifiable, while still enabling the ongoing development of these areas in a way that maintains the underlying character of the area. The extent of character protection from that which currently exists in the ODP is significantly reduced based on an assessment of the character contribution of these areas. Areas where character protection is no longer proposed will be up-zoned in line with the requirements of the NPS-UD and MDRS provisions.</p> <p>Option 1 is therefore the preferred option.</p>		
<p>Option 2: Status Quo</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p><u>Policies:</u></p> <p>Policy 4.2.2.1 Operative District Plan</p> <p><u>Rules:</u></p> <p>5.3.5 New buildings within the Thorndon Character Area and Mt Victoria North Residential Character Area as a restricted discretionary activity.</p> <p>5.3.6 The demolition of pre-1930 buildings (excluding</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Maintaining character protections over the existing extent of pre-1930 character areas will bring costs associated inability to redevelop existing properties. Analysis undertaken of the existing character areas classified existing building stock into one of four categories (primary, contributory, neutral, and detractive), reflecting the relative character contribution of the building on that site. Maintaining the extent of the existing character areas would continue character protection for buildings which may have a neutral or detractive contribution to character. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> The principal environmental benefit resulting from this option is the continuation of the existing extent of character protections. In turn this will retain protection over a larger number of pre-1930 buildings (approx. 5,500 properties) and provide an environmental benefit in the maintenance of a high level of amenity within these areas deriving from their character. This will have wider streetscape and sometimes townscape benefits. <p><i>Economic</i></p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> The proposed changes are informed and supported by a comprehensive analysis of the character contribution of each dwelling within the proposed character areas. The proposed approach is consistent with the ability to identify these areas under the qualifying matters provisions of the NPS-UD and RMA. <p>By pursuing this option, the associated risk is of maintaining character protection over sites that have been assessed as having a neutral or detractive character contribution, not justifying their exemption as a qualifying matter under the NPS-UD and therefore not up-zoning these areas in</p>

<p>accessory buildings) as a restricted discretionary activity.</p> <p>Other Methods:</p> <p>Residential Design Guide</p>	<ul style="list-style-type: none"> • In other words, this would maintain character protection for buildings which may not justify character protection, especially in terms of the NPS-UD. In turn this would limit the redevelopment of these sites, or impose economic costs through a regulatory process that is not justified relative to the character contribution of those dwellings. • There is therefore an environmental cost in protecting buildings that have been assessed as having a neutral or detractive character contribution, foreclosing the ability to redevelop these sites or imposing regulatory costs through a resource consent process, and limiting the potential positive effects of redevelopment that would maintain or enhance the character of these areas. • The maintenance of the physical resource of the existing buildings, and limiting building waste to landfill, is also an environmental benefit. <p>Economic</p> <ul style="list-style-type: none"> • Akin to Option 1, the economic costs of this option relate to the opportunity cost of precluding redevelopment of sites over which character protection is maintained, and the regulatory costs of imposing character protection. • As noted above, under this option, character protections would be maintained over the existing character areas. An evaluation of these areas has highlighted that there are concentrations of neutral and/or detractive dwellings with the existing character areas that do not make a strong character contribution. Ongoing protection of these areas is not considered to be justifiable relative to both the regulatory costs imposed by the protection, and the need to give effect to the NPS-UD. <p>Social</p> <ul style="list-style-type: none"> • Associated with the economic costs identified above, social costs stemming from this option relate to the restriction on potential land use options for landowners within the character precincts. • Social costs also fall on the wider community from the same restrictions, namely that the character protections preclude wider development or redevelopment in these areas, in line with the requirements of the NPS-UD and therefore in not providing for plan enabled development capacity. 	<ul style="list-style-type: none"> • Similar to Option 1, there may be benefits to property values resulting from the character protections, and resultant amenity values in the Character Precincts compared to neighbouring areas. • There may also be wider benefits to the city from the inherent value of the character areas. Again, this is unquantified and likely to be marginal. • No other economic benefits of this option are identified. <p>Social</p> <ul style="list-style-type: none"> • Social benefits resulting from this option fall to landowners within the character precincts who will continue to benefit from the amenity created within the character precincts. • A similar benefit, albeit to a lesser degree, is the benefit of maintaining the character areas to the wider community in terms of the appreciation of this character and streetscape and townscape benefits, such as the importance placed on these areas by sectors of the community as being important to the identity of the city. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified. 	<p>accordance with the NPS-UD to provide for additional development capacity.</p>
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	<p>Cultural</p> <ul style="list-style-type: none"> No direct or indirect costs have been identified. 		
Effectiveness and efficiency	<p>Effectiveness</p> <p>A continuation of the current approach to the management of character would be effective in achieving the objective, as supported by a review of the operability of the current ODP provisions.</p> <p>However, the approach would not be effective in targeting the proposed regulatory approach to areas with the highest concentrations of primary and contributory character, and would instead capture areas of lesser character that would not be justifiable in terms of 'qualifying matters' under the NPS-UD and RMA.</p>	<p>Efficiency</p> <p>The efficiency of Option 2 is considered to be similar to Option 1.</p> <p>The option is less efficient in how applications for demolition would be considered, with minor changes made in the proposed policy as compared to the existing applicable policy. These distinctions are discussed in an earlier section of this report.</p> <p>The efficiency of this option is also lessened through its capture of a wider area of character protection than is considered to be justifiable.</p>	
Overall evaluation	<p>A continuation of the existing approach is not considered to be the most effective or efficient approach, because:</p> <ol style="list-style-type: none"> Character protection would be maintained over areas that do not make a sufficient character contribution to justify their ongoing protection as a qualifying matter under the NPS-UD and RMA. Accordingly, the approach would not appropriately give effect to the NPS-UD and RMA. <p>The approach would also bring economic and social costs that would not be justified by the resultant benefits due to the scale of protection proposed and the character quality of the areas to be protected.</p>		
Option 3: Alternative approach to provisions	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>N/A</p> <p>Rules:</p> <p>N/A</p> <p>Other Methods:</p> <p>N/A</p>	<p>Environmental</p> <ul style="list-style-type: none"> This option would see the complete removal of the existing character protections contained in the ODP and the up-zoning of the areas in line with the requirements of the NPS-UD and MDRS. The environmental cost associated with this option is the potential for the loss (including the potential for the complete loss over the long term) of the character of these areas as their ongoing development or redevelopment occurs without reference to the management of character. The loss of existing character buildings would also result in the loss of the physical resources that constitute the existing buildings. <p>Economic</p> <ul style="list-style-type: none"> Economic costs from this option will result from the potential for the loss of character buildings and their inherent value over time. Such costs have not been quantified. Economic costs will also result from the development or redevelopment of these sites which will be countered by the economic benefits of development. 	<p>Environmental</p> <ul style="list-style-type: none"> The environmental benefits of this option relate to the potential for redevelopment of the existing character areas stemming from the removal of character protections, and the resultant positive effects that could arise from new development. These relate to further increases in density and resultant benefits of good urban form outcomes and the potential for improved design outcomes. <p>Economic</p> <ul style="list-style-type: none"> Economic benefits of this option will result from the ability of landowners to develop, or redevelop, their property beyond the limitations that would otherwise be in place as a result of the character protection options. This would result in benefits in the overall supply of housing and resultant economic activity. <p>Social</p> <ul style="list-style-type: none"> The social benefits of this option will accrue to landowners within the character precincts who have development ambitions for their property outside of what is envisaged by the proposed provisions, and in providing for a greater degree of District Plan enabled 	<p>The uncertainty of this option relates to the degree of change that will be seen resulting from the removal of character protections, and the potential rate of that change.</p>

	<p>Social</p> <ul style="list-style-type: none"> • Social costs resulting from this option relate to the loss of character buildings. These costs will fall in the first instance on residents within the character areas who value the character inherent in their area and the resultant amenity of the areas. Further, the loss of character will be felt by the wider community, particularly those who value these areas and the contribution they make to Wellington's identity. • Removal of the existing character protections will not result in wholesale change in the areas, but will enable a gradual erosion of the character as individual landowners make development decisions about their properties. Thereby the costs of this option will be spread over time. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified. 	<p>development capacity in line with the up-zoning required by the NPS-UD and MDRS.</p> <ul style="list-style-type: none"> • Further social benefits will accrue from the increase in development capacity enabled as a result of not limiting development capacity across these areas. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect benefits have been identified. 	
<p><u>Effectiveness and efficiency</u></p>	<p>Effectiveness</p> <p>This option will not be effective in achieving the objective in that it will remove the existing protections provided to these areas, and require the up-zoning of the areas in accordance with Policy 3 of the NPS-UD and the MDRS. The option is therefore fundamentally at odds with the objective.</p> <p>Resultingly, the character of these areas will erode over time as development or redevelopment of sites continues. New development would not be assessed or controlled with reference to its contribution to character. It would therefore not be effective in achieving the objective.</p>	<p>Efficiency</p> <p>Given that this option would remove demolition controls over the character areas it will not be efficient in maintaining the character of the Character Precincts as sought by the objective.</p>	
<p><u>Overall evaluation</u></p>	<p>This option is not preferred in that it will not achieve the objective.</p> <p>Removing character protections entirely will remove any control over both the demolition of pre-1930 buildings and in having any design controls over new development in these areas. Removing the protection would also necessitate the up-zoning of these areas in line with the NPS-UD as they would not be exempt as 'qualifying matters' and the resultant development that would be enabled would be at odds with the character of the area.</p>		

Objective MRZ-PREC02-O1:			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u></p> <p>MRZ-PREC02-P1</p> <p>MRZ-PREC02-P1 addresses the maintenance of townscape values within the Mt Victoria North Townscape Precinct</p> <p><u>Land Use Activities Rules:</u></p> <p>As per the Medium Density Residential Zone.</p> <p><u>Building and Structure Activities Rules:</u></p> <p>MRZ-PREC02-R1 – Maintenance and repair of buildings and structures – Permitted Activity.</p> <p>MRZ-PREC02-R2 – Demolition or removal of buildings and structures – Permitted Activity.</p> <p>MRZ-PREC02-R3 - Construction, addition or alteration of any buildings or structures – Restricted Discretionary Activity.</p> <p>MRZ-PREC02-R4 – Fences and standalone walls – Permitted Activity.</p> <p>MRZ-PREC02-R5 – Buildings and structures on or over legal road – Restricted Discretionary Activity.</p> <p><u>Standards:</u></p> <p>As per the Medium Density Residential Zone.</p> <p><u>Other Methods:</u></p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Under the proposal, new buildings or additions and alterations to an existing building will require a resource consent within the Mt Victoria North Townscape Precinct. The environmental costs of the proposal relate to the proposed restrictions potentially foreclosing development opportunities within the precinct. In the absence of the proposed precinct, the area would be zoned to provide for development opportunities aligning with the MDRS and Policy 3 of the NPS-UD. <p><i>Economic</i></p> <p>The economic costs of this option relate to:</p> <ul style="list-style-type: none"> The opportunity cost of precluding the redevelopment of sites within the precinct beyond and requiring a resource consent approval for all built development; and The imposition of costs related to resource consent processes for development within the precinct. In the absence of the proposed precinct, the affected area would otherwise be up-zoned in line with the requirements of the MDRS and Policy 3 of the NPS-UD, as are the surrounding areas within the MDRZ. The likelihood of redevelopment occurring if the area was not protected will be dependent on a number of factors including individual landowner decisions, property values, the quality of the existing buildings, and site area among a range of variables. Therefore, the cost of precluding permitted activity development does not mean that redevelopment of all of the sites within the proposed precinct would occur, nor can a specific timeframe be placed on when the redevelopment potential may be taken up. There will be costs incurred by landowners and/or developers in engaging in the resource consent process to undertake changes within the proposed precinct. These costs are considered to be acceptable relative to the benefits of the proposal in achieving the proposed objective. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Development within the precinct will require a resource consent process for any new building or additions and alterations to an existing building. The positive environmental effects from this restriction relate to ensuring that new development maintains and does not detract from the townscape values of the precinct. That positive effect relates to the maintenance of the important and iconic townscape values of this area. <p><i>Economic</i></p> <ul style="list-style-type: none"> Whilst unquantified, there may be benefits to property values resulting from the townscape protections, and resultant amenity values in the proposed precinct. There are also likely to be wider benefits to the city from the inherent value of the townscape precinct. The area is a well-known and iconic element the Wellington townscape and a focal element in views from the city and waterfront. Again, the economic value of this benefit has not been quantified. <p><i>Social</i></p> <ul style="list-style-type: none"> Social benefits from the proposal will result from the management of development within the proposed precinct and its positive effect on the Wellington townscape. These benefits accrue to both residents within the precinct, and to the wider community and visitors through views of the Precinct. Views to the precinct will vary in the scale, and will be both longer term or transitory. These benefits relate to the importance placed on the precinct by the community in providing Wellington with a sense of place and identity as identified through the consultation and research undertaken on this topic area. <p><i>Cultural</i></p> <ul style="list-style-type: none"> No direct or indirect benefits have been identified. 	<p>It is considered that there is certain and sufficient information on which to base the proposed policy and methods as:</p> <ul style="list-style-type: none"> The proposed changes are informed and supported by a comprehensive analysis of the townscape values of the proposed precinct including an assessment of its boundaries and its composition of individual properties. The approach proposed is consistent with the ability to identify this area as a precinct under the qualifying matters provisions of the NPS-UD and RMA.

<p>Residential Design Guide – Mt Victoria North Townscape Precinct</p>	<p>Social</p> <p>Social costs relate to:</p> <ul style="list-style-type: none"> • Additional restrictions on landowners in their ability to re-develop their property through the requirement for a resource consent for all new development and additions and alterations to existing buildings within the precinct. • Restrictions on the permitted activity development potential of the area to the extent that would otherwise be enabled by the MDRS and Policy 3 of the NPS-UD. This will have the effect of reducing the otherwise available plan enabled development capacity provided for by the underlying zoning. • While ongoing infill development or redevelopment is provided for, and the provisions adopt the bulk and location standards of the MDRS, the key restriction is that development must be assessed for its effects on the townscape values of the area. • It is considered that the proposed provisions strike an appropriate balance in achieving the purpose of the proposed objective. They provide for appropriate development to continue to occur commensurate with the townscape values that the precinct is seeking to protect. Again, this is considered to be appropriate in order to achieve the applicable objective. <p>Cultural</p> <ul style="list-style-type: none"> • No direct or indirect costs have been identified. 		
<p><u>Effectiveness and efficiency</u></p>	<p>Effectiveness</p> <p>The proposed policy, rules and standards specific to the Mt Victoria North Townscape Precinct are considered to be effective in achieving the applicable objective. The proposed provisions are similar to the existing ODP provisions which have been shown to be effective in maintaining the townscape values of the existing Mt Victoria North Character Area. The applicable building standards have been aligned with the standards of the MDRS to achieve the intent of those provisions as much as possible and to ensure consistency in the application of the PDP.</p> <p>The townscape values of the precinct will be maintained through the resource consent process required for new building development and additions and alterations to existing built development. Assessment of new development against applicable design guidance will ensure that new development responds positively to the townscape values of the precinct and does not diminish those values. The effectiveness of this approach is a continuation of the existing ODP approach which has been shown to be effective as demonstrated in this evaluation, relative to the regulatory impost of the provisions.</p>	<p>Efficiency</p> <p>The proposed provisions are efficient in their primary purpose of managing the townscape values of the proposed precinct. They achieve this through a regulatory approach to the construction of new buildings and additions and alterations to existing buildings.</p> <p>This is fundamentally a continuation of the existing approach of the ODP. Proposals are considered against the applicable design guidance and the policy intent of the District Plan. The considerations are narrow in their focus, and the provisions recognize the importance of providing for the ongoing use and development of the precinct.</p> <p>Rule MRZ-PREC02-R3 relating to the construction of new residential buildings and additions and alterations to existing buildings provides for a public notification preclusion to improve the efficiency of this rule.</p>	

Overall evaluation	<p>This is the most appropriate approach to achieve the objective.</p> <p>The proposed provisions seek to strike an appropriate balance between providing for the ongoing use and development of the precinct, while ensuring that development does not diminish the townscape values of the precinct. Development standards have been aligned with those of the MDRS to ensure consistency with the wider Medium Density Residential Zone chapter.</p> <p>Option 1 is therefore the preferred option.</p>		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>Policy 4.2.2.1 Operative District Plan</p> <p>Rules:</p> <p>Rule 5.3.5 Operative District Plan</p> <p>New buildings within the Thorndon Character Area and Mt Victoria North Residential Character Area as a restricted discretionary activity.</p> <p>Other Methods:</p> <p>Residential Design Guide</p>	<p>Environmental</p> <ul style="list-style-type: none"> As for Option 1, under the status quo new buildings or additions and alterations to an existing building will require a resource consent within the Mt Victoria North Townscape Precinct. The environmental costs of this option are the same as those identified for Option 1 and relate to the proposed restrictions on new built development potentially foreclosing development opportunities within the precinct. In the absence of the proposed precinct, the area would be zoned to provide for development opportunities aligning with the MDRS and Policy 3 of the NPS-UD. <p>Economic</p> <ul style="list-style-type: none"> As for Option 1, the economic costs of this option relate to the costs imposed on landowners through the resource consent process in seeking to develop their property, and to precluding the extent of permitted activity development that would otherwise be provided for in the absence of the proposed approach to the management of the precinct. <p>Social</p> <ul style="list-style-type: none"> Associated with the economic costs identified above, social costs stemming from this option relate to the restriction on potential land use options for landowners within the townscape precinct. Social costs also fall on the wider community from the same restrictions, namely that the development restrictions preclude permitted activity development or redevelopment in these areas. This restricts the plan enabled development capacity of the area that would otherwise be provided in accordance with the requirements of the MDRS and NPS-UD. <p>Cultural</p> <ul style="list-style-type: none"> No direct or indirect costs have been identified. 	<p>Environmental</p> <ul style="list-style-type: none"> The principal environmental benefit resulting from this option is the continuation of the existing extent of townscape protection. This will ensure that new development maintains and does not detract from the townscape values of the precinct. That positive effect relates to the maintenance of the important and iconic townscape values of this area. As for Option 1, development within the precinct will require a resource consent process for any new building or additions and alterations to an existing building. <p>Economic</p> <ul style="list-style-type: none"> Whilst unquantified, there may be benefits to property values resulting from the townscape protections, and resultant amenity values in the proposed precinct. There are also likely to be wider benefits to the city from the inherent value of the townscape precinct. The area is a well-known and iconic element the Wellington townscape and a focal element in views from the city and waterfront. Again, the economic value of this benefit has not been quantified. No other economic benefits of this option have been identified. <p>Social</p> <ul style="list-style-type: none"> Social benefits from this option will result from the management of development within the proposed precinct and its positive effect on the Wellington townscape. These benefits accrue to both residents within the precinct, and to the wider community and visitors through views to precinct. Views to the precinct will vary in the scale, and will be both longer term or transitory. These benefits relate to the importance placed on the precinct by the community in providing Wellington with a sense of place and identity as identified through the consultation and research undertaken on this topic area. 	<p>It is considered that there is certain and sufficient information on which to base the proposed policy and methods as:</p> <ul style="list-style-type: none"> The proposed changes are informed and supported by a comprehensive analysis of the townscape values of the proposed precinct including an assessment of its boundaries and its composition of individual properties. The approach proposed is consistent with the ability to identify this area as a precinct under the qualifying matters provisions of the NPS-UD and RMA. The approach is a continuation of the established ODP approach to the management of this area.

		Cultural	
		<ul style="list-style-type: none"> No direct or indirect costs have been identified. 	
Effectiveness and efficiency	<p>Effectiveness</p> <p>A continuation of the current approach to the management of townscape values in this area would be effective in achieving the objective, as supported by a review of the operability of the current District Plan provisions.</p> <p>However, the approach would not be effective in achieving consistency with the National Planning Standards, nor would it align with the bulk and location provisions of the MDRS. Option 1 also provides a more detailed policy framework for this townscape precinct.</p>	<p>Efficiency</p> <p>The efficiency of Option 2 is considered to be the same as Option 1 in maintaining townscape protection through its regulatory approach.</p> <p>Option 2 is considered to be less efficient as a result of a less specific policy approach to the management of this townscape precinct.</p>	
Overall evaluation	<p>A continuation of the existing approach is almost equivalent to the approach proposed by Option 1, except that:</p> <ol style="list-style-type: none"> Option 1 is more effective in aligning the proposal with the provisions of the MDRS in respect of bulk and location standards; and Option 1 provides a more detailed policy framework to the management of the townscape values of the precinct. <p>As a result, Option 2 is not preferred.</p>		
Option 3: Alternative approach to provisions	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>N/A</p> <p>Rules:</p> <p>N/A</p> <p>Other Methods:</p> <p>N/A</p>	<p>Environmental</p> <ul style="list-style-type: none"> This option would see the complete removal of the existing townscape protection contained in the ODP and the up-zoning of the areas in line with the requirements of the NPS-UD and MDRS. The environmental cost associated with this option is the potential for the erosion of the townscape values of the proposed precinct through the development of the area without reference to the existing townscape values of the area that would otherwise be managed through a resource consent process. <p>Economic</p> <ul style="list-style-type: none"> Economic costs from this option will result from the potential erosion of the townscape values of the precinct and their inherent value, over time. Such costs have not been quantified. <p>Social</p> <ul style="list-style-type: none"> Social costs resulting from this option relate to the potential for the erosion of the townscape values of this area. These costs will fall in the first instance on residents within the area who value the particular characteristics of the precinct. Further, the loss of townscape values will be experienced by the wider community that value the distinctive townscape values of the area. 	<p>Environmental</p> <ul style="list-style-type: none"> The environmental benefits of this option relate to the potential for redevelopment of the area as a result of the removal of a resource consent requirement for all new development. This in turn could lead to positive effects arising from new development. These positive effects relate to potential increases in density and resultant benefits of good urban form outcomes. <p>Economic</p> <ul style="list-style-type: none"> Economic benefits of this option will result from the ability of landowners to develop, or redevelop, their property beyond the limitations that would otherwise be in place because of the proposed townscape provisions. This could result in benefits in the overall supply of housing and resultant economic activity. <p>Social</p> <ul style="list-style-type: none"> The social benefits of this option will accrue to landowners within the proposed townscape precinct who have development ambitions for their property by removing the resource consent process that would otherwise be required to assess a given development proposal. Further social benefits will result from the increase in permitted development capacity enabled as a result of 	<p>The uncertainty of this option relates to the degree of change that will be seen resulting from the removal of regulatory control over impacts on townscape values, and the potential rate of that change.</p>

	<ul style="list-style-type: none"> Removal of the existing townscape protections will not result in wholesale change in the area, but will enable the potential for the gradual erosion of townscape values as individual landowners make development decisions about their properties. Thereby the costs of this option will be spread over time. <p>Cultural</p> <ul style="list-style-type: none"> No direct or indirect costs have been identified. 	<p>removing resource consent requirements for development within the proposed townscape precinct.</p> <p>Cultural</p> <ul style="list-style-type: none"> No direct or indirect benefits have been identified. 	
<p><u>Effectiveness and efficiency</u></p>	<p>Effectiveness</p> <p>This option will not be effective in achieving the objective in that it will remove the existing protections provided to this area through a resource consent requirement for new development. It will also require the up-zoning of the areas in accordance with Policy 3 of the NPS-UD and the MDRS and enable a higher degree of permitted activity development that may erode the townscape values of the area. The option is therefore fundamentally at odds with the objective.</p> <p>Resultingly, the townscape values of the area will potentially erode over time as the development or redevelopment of individual sites continues. New development would not be assessed or controlled with reference to its response to the townscape values of the area. It would therefore not be effective in achieving the objective.</p>	<p>Efficiency</p> <p>Given that this option would remove townscape protections stemming from a resource consent process, it will not be efficient in ensuring that the townscape values of the proposed precinct are maintained and not eroded.</p>	
<p><u>Overall evaluation</u></p>	<p>This option is not preferred in that it will not achieve the objective.</p> <p>By not maintaining a resource consent requirement for new development in the area, new development will be permitted (subject to standards) and will have the potential to erode the townscape values of the area. Removing townscape controls would also necessitate the up-zoning of these areas in line with the MDRS and NPS-UD.</p>		

12.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposals having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

Both proposals for the proposed Character Precincts and the Mt Victoria North Townscape Precinct meet the qualifying matters tests for the purposes of the MDRS provisions and Policy 3 of the NPD-UD.

Both proposals also largely adopt the provisions of the MDRS to achieve consistency with the Medium Density Residential Zone and to maximise development capacity within the restrictions imposed by these precincts. This has resulted in the existing pre-1930 character areas being reduced in their current extent by 71.%.

In conclusion, the evaluation demonstrates that the preferred proposals are the most appropriate RMA options for these two precincts.

Appendix 1: Feedback on Draft District Plan 2021

A summary of the submissions received on the Draft District Plan can be found on the Wellington City Council website under the Proposed District Plan, 'District Plan Review Timeline' section.

Who	Feedback Received	Response
<p>General public</p> <p>Landowners</p> <p>Community groups</p> <p>Residents Associations</p>	<p>Various submission points were made relating to:</p> <ol style="list-style-type: none"> 1. Opposition to the proposed Precincts given the need to maximise development capacity. 2. Questioning the value of retaining housing stock that is perceived as being old and not fit for purpose. 3. Support for the proposed spatial extent of the Precincts. 4. A continuation of the spatial extent of the existing character areas. 5. Site and area specific boundary changes to the proposed Precincts. 6. That the Council adopts the spatial extent of the Precincts proposed as part of the recommendations made on the final Spatial Plan. 7. Support for the proposed provisions. 8. Concerns regarding provisions relating to the City Centre Zone at the interface with the proposed Character Precincts. 9. Concerns relating to increased shading and other amenity effects in areas where demolition controls are removed. 10. Concerns relating to the loss of character where demolition controls are removed. 	<p>No changes are proposed to the spatial extent of the proposed Precincts as the Council was not supportive of any changes when adopted the final Wellington Spatial Plan, and the proposed boundaries have been carried over from the Spatial Plan.</p> <p>The PDP seeks to strike an appropriate balance between retaining character and townscape protection and giving effect of the requirement of the MDRS and NPS-UD.</p> <p>The proposed provisions are the most appropriate to achieve the proposed objectives.</p> <p>Some changes were more appropriately by other zone evaluations.</p>

Kāinga Ora	<p>Kāinga Ora seeks that:</p> <ol style="list-style-type: none"> 1. MRZ-PREC01 is deleted in its entirety, and; 2. That the proposed character precincts areas are assessed for historic heritage values if they are to be protected. 	<p>No changes are proposed as the proposed Precincts have been identified as appropriate qualifying matters for inclusion in the PDP.</p>
Heritage New Zealand	<p>Seeks that the areas identified by the submitter as part of the development of the spatial plan be included.</p> <p>Supports the definition of character for the purpose of character precincts. Notes a typo in the definition of character</p> <p>Supports the definition of demolition for the purpose of the character precincts.</p>	<p>No changes are proposed to the spatial extent of the Precincts.</p> <p>Yes, a minor change to correct a typographical error.</p>

Appendix 2: Operative District Plan provisions for Pre-1930 Character Areas and the Mt Victoria North Character Area

OBJECTIVE – CHARACTER AND SENSE OF PLACE

4.2.2 To recognise and enhance those characteristics, features and areas of the Residential Area that contribute positively to the City’s distinctive physical character and sense of place.

POLICIES

To achieve this objective, Council will:

4.2.2.1 Maintain the character of Wellington’s inner city suburbs

METHODS

- Rules
- Design Guides

Wellington City’s original inner city suburbs, wedged between the central city and the Town Belt, are recognised as an important feature of our city. The suburbs of Thorndon, Mount Victoria, Mt Cook, Newtown, Berhampore, lower Kelburn and Aro Valley provide part of the back drop to the central city and contribute to the City’s unique sense of place. Their high visibility and original building stock make a significant contribution to Wellington City’s unique character and are important in helping to define Wellington’s sense of place. Studies have identified that the overall character of the inner city suburbs is principally defined by the high concentration of original dwellings dating from the mid-to-late 19th and early 20th century. While the suburbs contain notable buildings and structures from other periods, it is the concentration of fine grained, predominantly wooden houses, that is most evident and which lends a unique ‘sense of place’ to central Wellington as a whole. The District Plan controls therefore focus on buildings constructed prior to 1930.

The character of these neighbourhoods is experienced, by the public at large, from the street and other public spaces. Townscape is the collective term used to describe what can be seen from these public spaces. Townscape can be experienced at a variety of scales, ranging from the immediacy of adjacent streets and public spaces, to longer distance views across a valley. When viewed from a distance it is generally the size and shape of the building’s primary form, in relationship with neighbouring buildings and the backdrop of harbour and hills that contribute most to the wider character of the neighbourhood. When viewed up close the placement of buildings on site, the spaces between and around buildings, the size, shape and placement of openings, and the levels of architectural detail and articulation become important elements contributing to townscape character.

The Plan contains a number of provisions to help ensure that the special character of the inner city suburbs is maintained and enhanced, and that any new development acknowledges and complements the existing townscape character. These include:

- controls on the demolition of existing pre-1930 buildings
- controls on the removal or demolition of architectural features from the primary elevation(s) of a pre-1930 building
- management of the design (including building bulk, height and scale), external appearance and siting of new infill and multi-unit development
- special controls on additions and alterations to buildings in the Mt Victoria North Character Area and Thorndon Character Area

- special controls on the construction of new accessory buildings between the road and existing buildings
- relaxation of the car-parking requirements for the conversion of existing buildings into two units

Demolition of pre-1930 buildings

The Plan includes rules restricting the demolition of pre-1930 buildings in the majority of the Inner Residential Area. The demolition rules are applied to those neighbourhoods where significant concentrations of older buildings contribute to a distinctive townscape character and a wider sense of place. They do not apply to all properties within the Inner Residential Area, as there are some areas where the existing building stock does not have sufficient consistency of age and character to justify the application of a pre-1930 demolition rule. The areas where the demolition rules apply are shown in the maps contained in Appendix 1, Chapter 5.

To help protect the value of these buildings to the townscape, the demolition or removal of pre-1930 buildings has been made a Discretionary Activity (Restricted). The focus of this rule is the contribution of the buildings to townscape character. While heritage is not the primary focus of the rule, townscape character is to some extent defined by heritage related qualities.

The date of 1930 has been chosen as buildings older than that date tend to match the characteristic building types of the inner city suburbs. It is recognised that different parts of the same building might be different ages. The age of the primary form of the building will be taken as the relevant date. Primary form means the simple form that is central to and the basis of the dwelling. It is typically the largest identifiable form or combination of relatively equal sized geometrically simple and box-like forms.

There are many variations of primary form. However, the primary form of the Victorian and Edwardian villa is typically square or rectangular in plan, one or two stories in height with a hip roof. The primary form of the cottage is typically single storey, rectangular in plan, with a gable roof.

When assessing a consent to demolish a pre-1930 building Council will consider first and foremost the contribution made by the existing building to townscape character. Council will assess:

- the level of visibility of the existing building from surrounding public spaces, including whether the building features in short, medium or long range views
- whether the existing building is consistent in form and style with other pre-1930 buildings that contribute positively to townscape character
- the extent to which the existing building retains its original design features relating to form, materials and detailing and the extent to which the form, style and important details have been modified
- whether the building is an integral part of a row of buildings that are consistent in form, scale and siting
- whether the building is important to the context of a building listed in the Schedule of Listed Heritage Items
- whether the building is within a sub-area identified in the Appendices to the Residential Design Guide
- whether the building represents a rare or unique example of pre-1930 architecture
- whether the building is a distinctive element within the local townscape.

When the above assessment indicates that the existing building makes a positive contribution to townscape character, applicants may request that Council also consider whether the condition of the existing building is such that its retention is impractical or unreasonable. Council will consider:

- the condition of the existing pre-1930 building, in particular the structural integrity of the building
- whether requiring retention of the building would render it incapable of reasonable use
- whether the building represents an environmental health hazard
- in the case of buildings constructed from unreinforced masonry, whether the building poses a risk to life in the event of an earthquake.
- Council may require an independent assessment of the structural integrity of the pre-1930 building from a qualified structural engineer.

There will be a strong presumption against the demolition of pre-1930 buildings unless the above analysis indicates that the existing building makes little contribution to valued aspects of the townscape character, or it can be clearly demonstrated that condition of the existing building makes its retention impractical.

Only when the above assessments indicate that demolition may be justified will Council consider the townscape contribution of any proposed replacement. Any proposal (including any replacement building(s)) will need to demonstrate that its contribution to townscape character is as good, or better, than the existing pre-1930 building. Council will consider:

- the extent to which the replacement building(s) meet the intent of the Residential Area Design Guide (particular attention will be paid to area specific
- the extent to which the bulk, scale and siting of the proposed building(s) respects the scale, building form and topography of the surrounding neighbourhood
- the extent to which materials and façade articulation are compatible with the predominant materials and patterns of the surrounding neighbourhoods
- the impact of any new open space on townscape character

While there is a presumption that pre-1930 buildings should be retained, demolition may also be contemplated in exceptional situations where the proposed replacement building is of such outstanding design quality that it justifies demolition of the existing pre-1930 building. Any application put forward to be considered as 'exceptional design' will need to articulate why the design is 'exceptional' and will also need to demonstrate that the new building is compatible with the surrounding townscape character, will make a significantly greater contribution to townscape character than the existing pre-1930 building, and that demolition and construction of a new building will not create a detrimental precedent in an area (or neighbourhood) sensitive to change. To ensure that these applications are subject to a suitably rigorous assessment process they will be considered by an independent panel of appropriately qualified design professionals, and consents will be publicly notified.

In the event that Council is satisfied that retention of the original building is impractical or unreasonable, the design quality of the replacement building(s) becomes an important factor, and any consent granted will be conditioned and monitored to ensure that the replacement structure is built strictly in accordance with the plans submitted with the resource consent.

Removal or demolition of architectural features from primary elevations

In addition to the demolition of the primary form of pre-1930 buildings, consideration will be given to the impact on townscape and neighbourhood character of the removal or demolition of architectural features and elements from a building's primary elevation(s). In most instances the 'primary elevation(s)' will be the elevation of the building that faces the street.

However there are five areas where the main elevation of the buildings have been oriented away from the street, towards a view or outlook. In this situation the main elevation is often still visible from surrounding streets and public spaces (albeit from an increased distance) and contributes to the overall character of the neighbourhood. The five areas front on to Kenwyn Terrace, Tasman Street, Wright Street, Ohiro Road and Maarama Crescent respectively and are identified in Appendix 1.

Depending on the nature of the work, additions and alterations may constitute the removal or demolition of architectural features from the building's primary elevation.

Matters to consider when assessing applications to remove or demolish architectural features from the primary elevation are:

- the level of visibility of the primary elevation from the street or other public space
- whether the building is an integral part of a row of buildings that are consistent in materials, detailing, form, and scale.
- the extent to which any work will compromise or destroy any pre-1930 design features or materials on the primary elevation(s). Whether the demolition and work will detract from the architectural style and character of the existing building, and have adverse effects on the special character of the townscape and neighbourhood as a whole
- the extent to which the building works meet the intent of the Residential Area Design Guide (particular attention will be paid to area specific Appendices)

Multi-unit developments

Any proposal comprising two or more units within the Inner Residential Area will be considered as a multi-unit development. New multi-unit development can significantly alter townscape character, particularly where smaller sites are amalgamated and established development patterns are changed. In response the Council has placed controls on the design of multi-unit developments within the Inner Residential Area. While not precluding renewal and redevelopment the Council is concerned to ensure that new multi-unit residential buildings are well designed, and acknowledge and complement the predominant patterns of the surrounding environment.

To aid the assessment of new multi-unit development the Council has incorporated, as part of this Plan, design guides for neighbourhoods within the Inner Residential Areas. The purpose of the design guides is not to impose specific design solutions but to identify design principles that will promote better development and enhance townscape character.

Mt Victoria North and Thorndon Character Areas

The Mt Victoria North Character Area has been identified as an important neighbourhood due to its high visibility and its proximity to St Gerard's Monastery and the escarpment below. When viewed from the Central Area (and in particular the waterfront) the houses, monastery and escarpment combine to form one of Wellington's most iconic urban landscapes. In this context the design of buildings is particularly important, so Council has placed additional controls on the design of additions and alterations to existing buildings in this area. The Council is concerned to ensure that any additions and alterations are well designed, respect the predominant patterns of the surrounding neighbourhood and the setting of St Gerard's Monastery.

The Thorndon Character Area covers a substantially intact remnant of the original fabric of the city. Many of the buildings date from the founding of the City as we know it by European settlers in the mid-nineteenth century. Most of the buildings in the area are modest workers' cottages and include some small dwellings built for the colonial militia. This grouping of colonial cottage and gardens, centred around the Thorndon town centre, remains relatively intact and is of historical significance to the Wellington region and to New Zealand as a

whole. The Council is concerned to ensure that any new building works acknowledge and respect the character and predominant patterns of the area.

Building proposals will be assessed against the Residential Design Guide (including the Thorndon and Mt Victoria appendices), the Thorndon Character Area Design Guide and the Mt Victoria North Character Area Design Guide, as relevant to the proposal.

5. RESIDENTIAL RULES

5.3 Discretionary Activities (Restricted)

5.3.5 In the Thorndon Character Area and Mt Victoria North Residential Character Area identified on the District Plan maps, the construction, alteration of, and addition to residential buildings, accessory buildings and residential structures, is a Discretionary Activity (Restricted) in respect of:

5.3.5.1 design (including building bulk, height, and scale), external appearance, and siting (including landscaping, parking areas, vehicle manoeuvring and site access)

5.3.5.2 provision of parking and site access

Non-notification

In respect of rule 5.3.5 applications will not be publicly notified (unless special circumstances exist or limited notified)

5.3.6 The demolition of any building (including the removal or demolition of architectural features from the primary elevation of any building), excluding accessory buildings, constructed prior to 1930 (or for which approval for construction was granted before 1930) in the Inner Residential Areas and Holloway Road (Outer Residential Area) shown in Appendix 1, is a Discretionary Activity (Restricted) in respect of:

5.3.6.1 the contribution made by the existing building to the townscape character of the neighbourhood

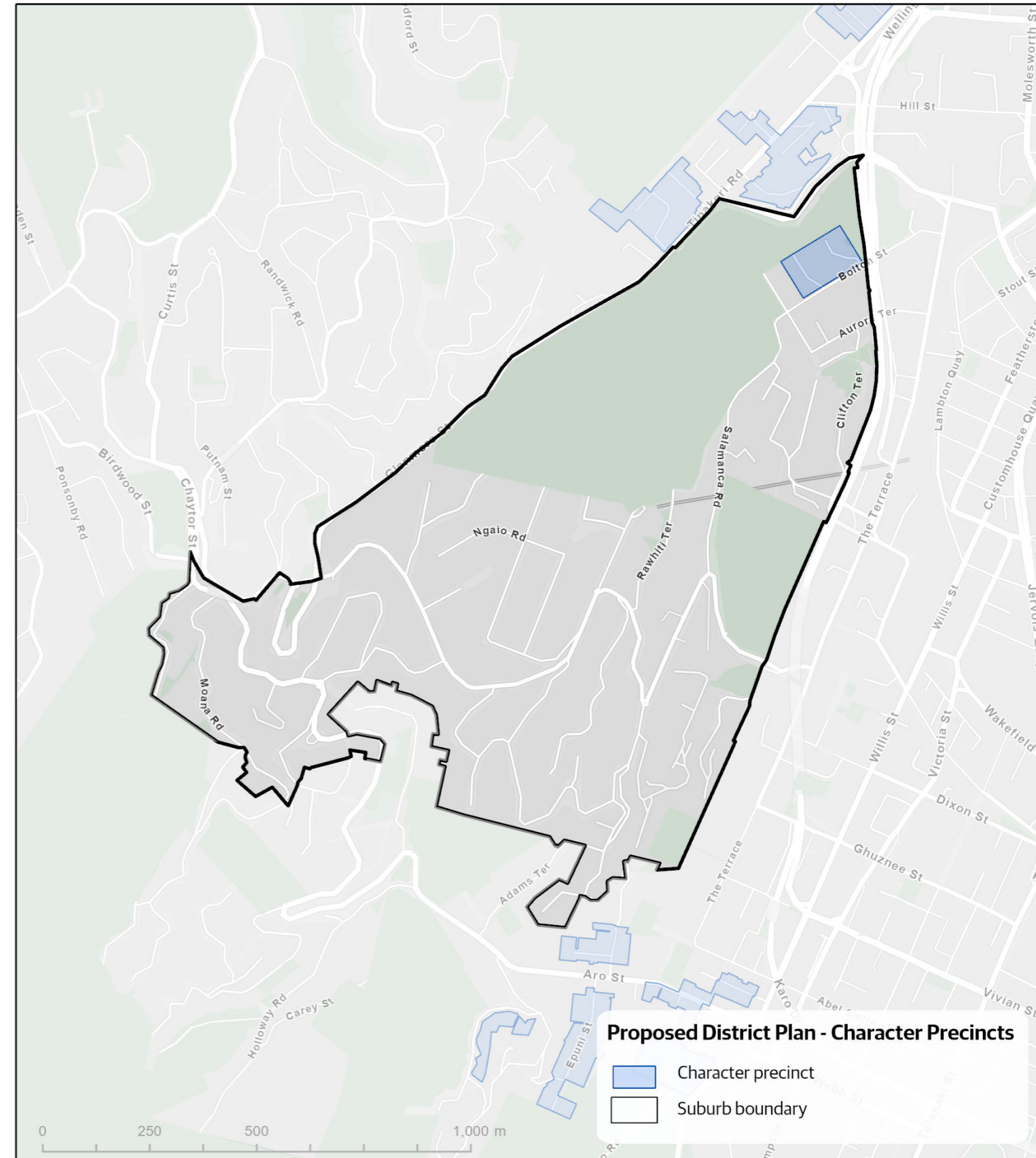
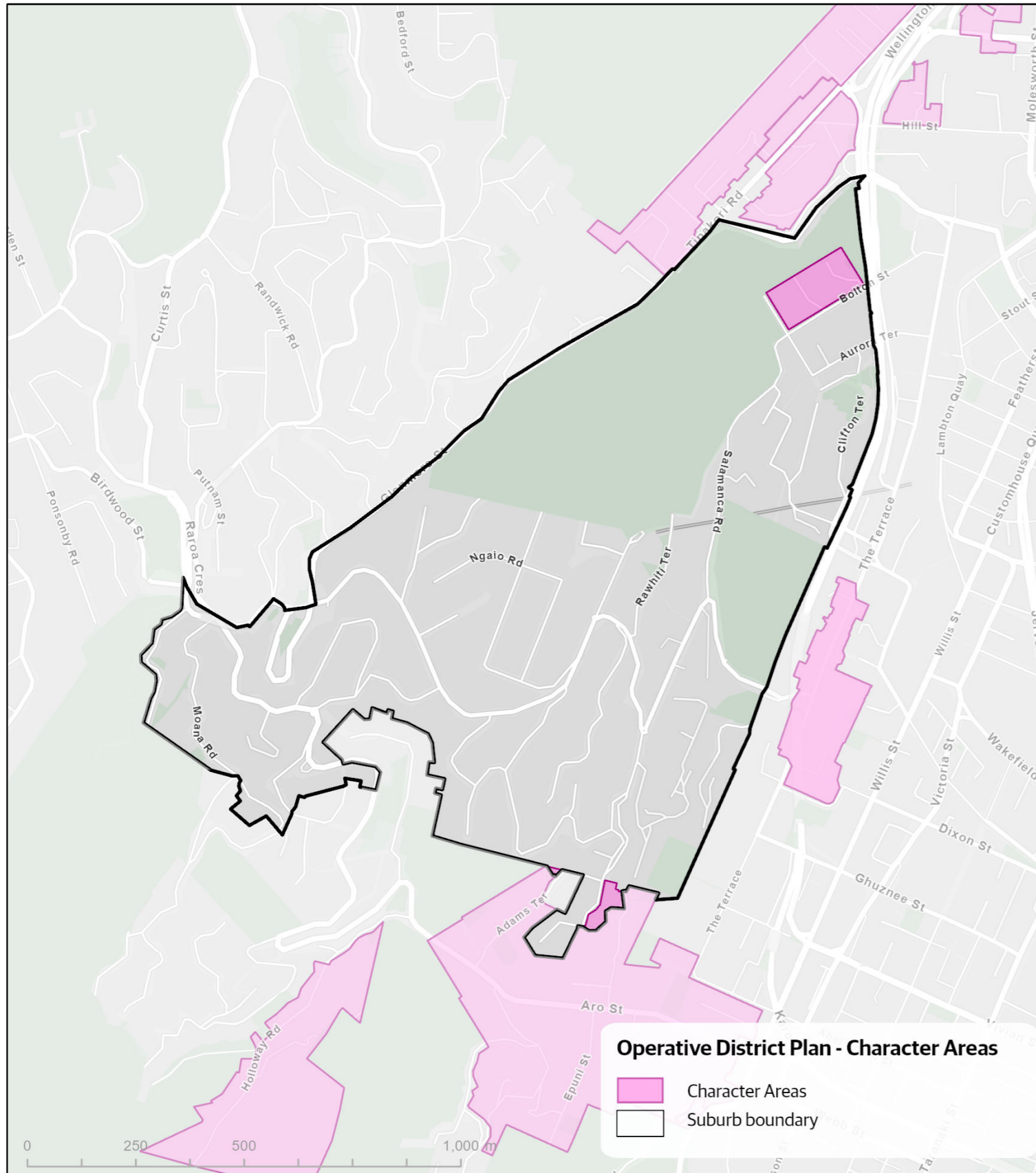
5.3.6.2 the physical condition of the existing building

5.3.6.3 the design of any proposed works (including any replacement building, or additions and alterations to an existing building), and the impact of these works on the townscape character of the neighbourhood.

Appendix 3: Character Precinct and Pre-1930s Maps

Appendix 4: Mt Victoria North Townscape Precinct Maps

Section 32 Report Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Kelburn

Date: 15/07/2022

Created by: District Plan Team

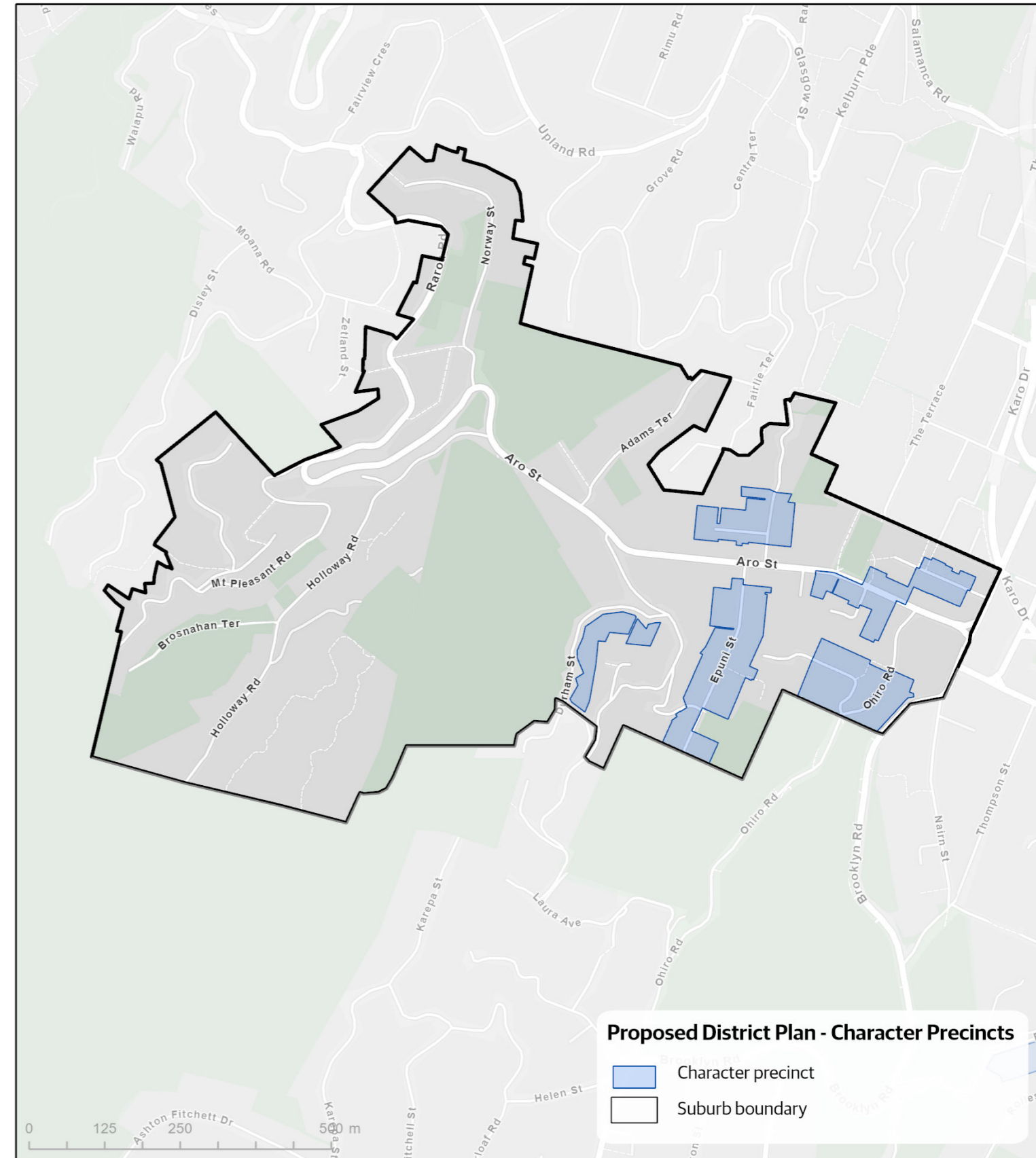
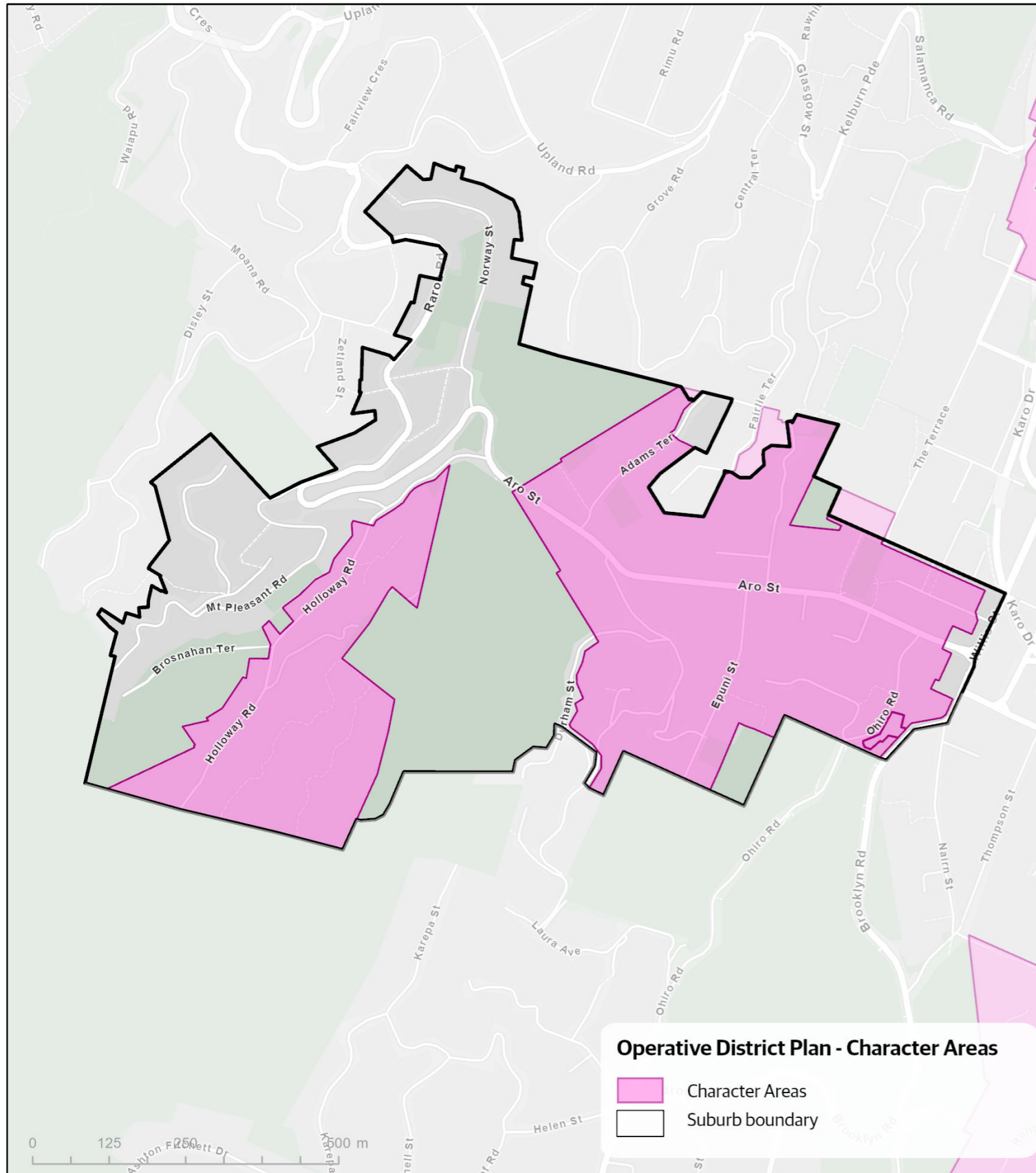
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Aro Valley

Date: 15/07/2022

Created by: District Plan Team

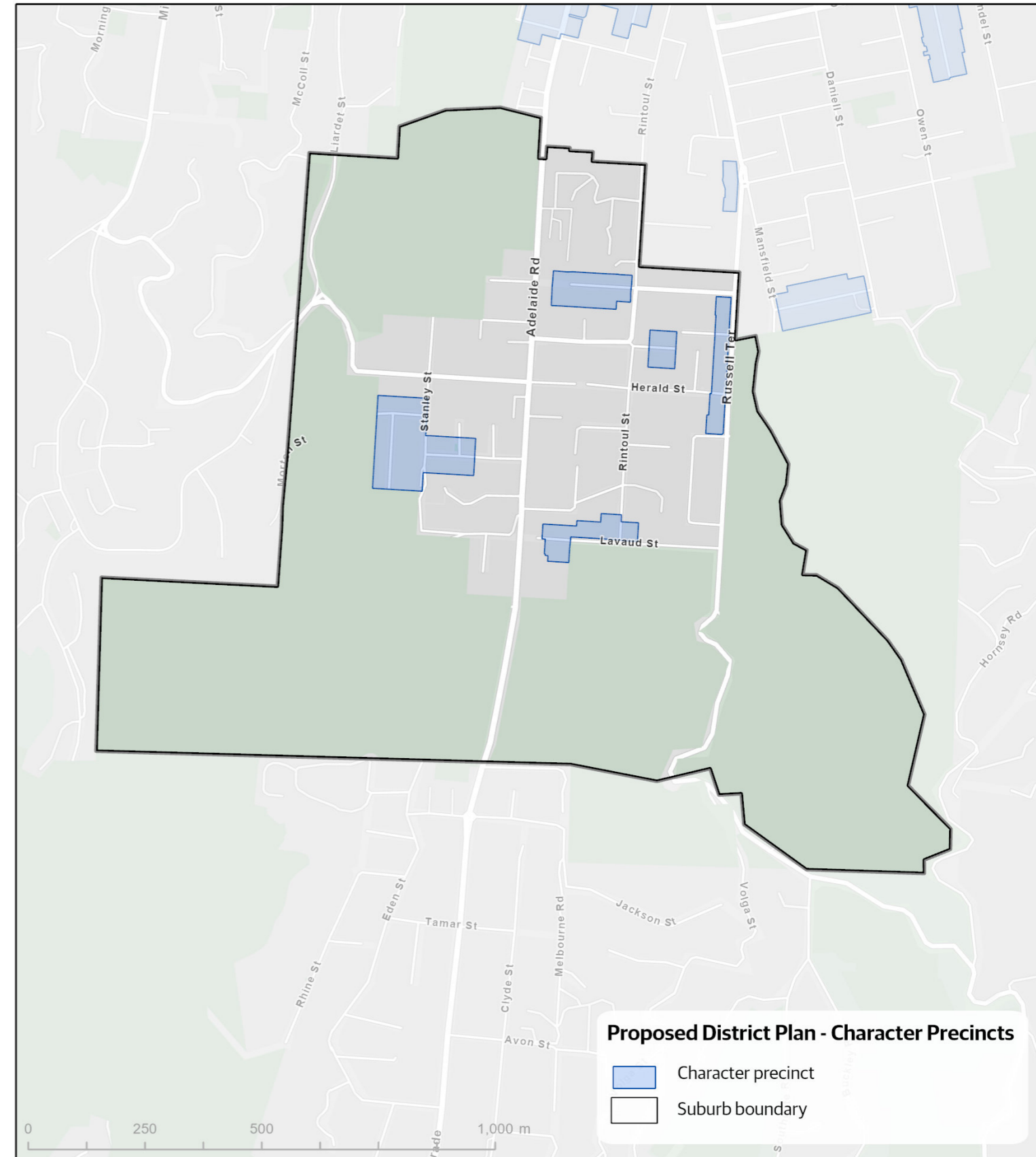
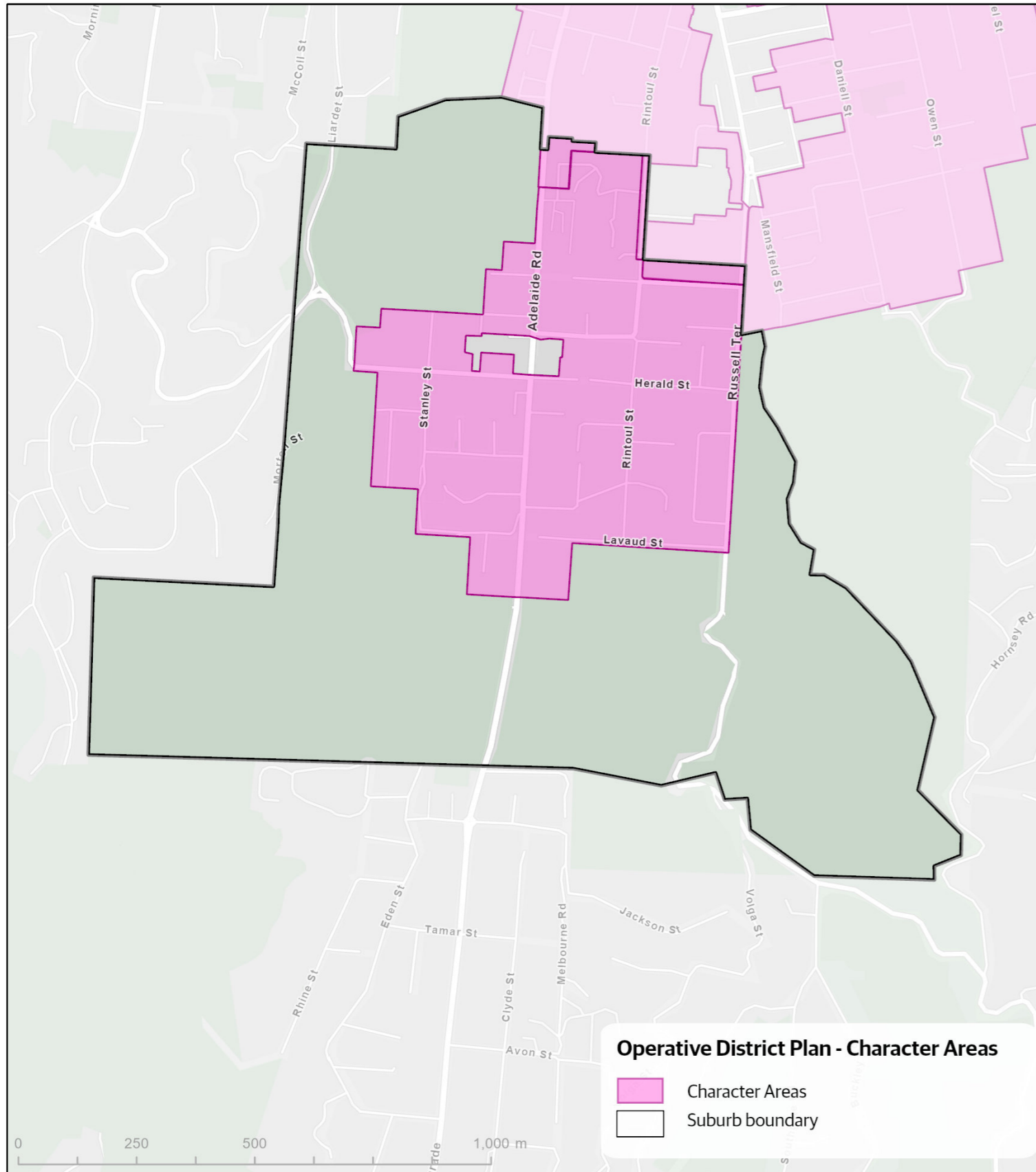
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Berhampore

Date: 15/07/2022

Created by: District Plan Team

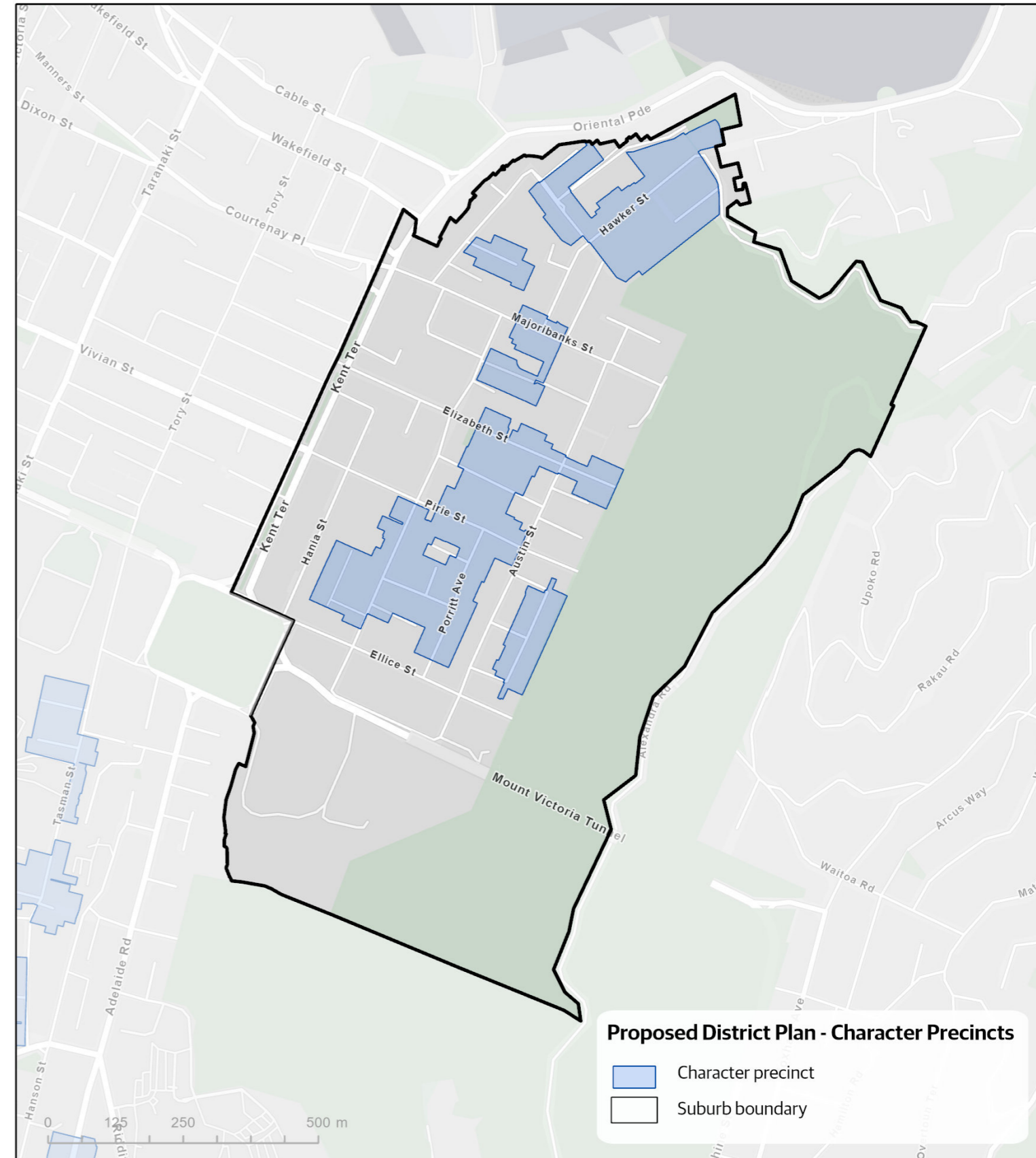
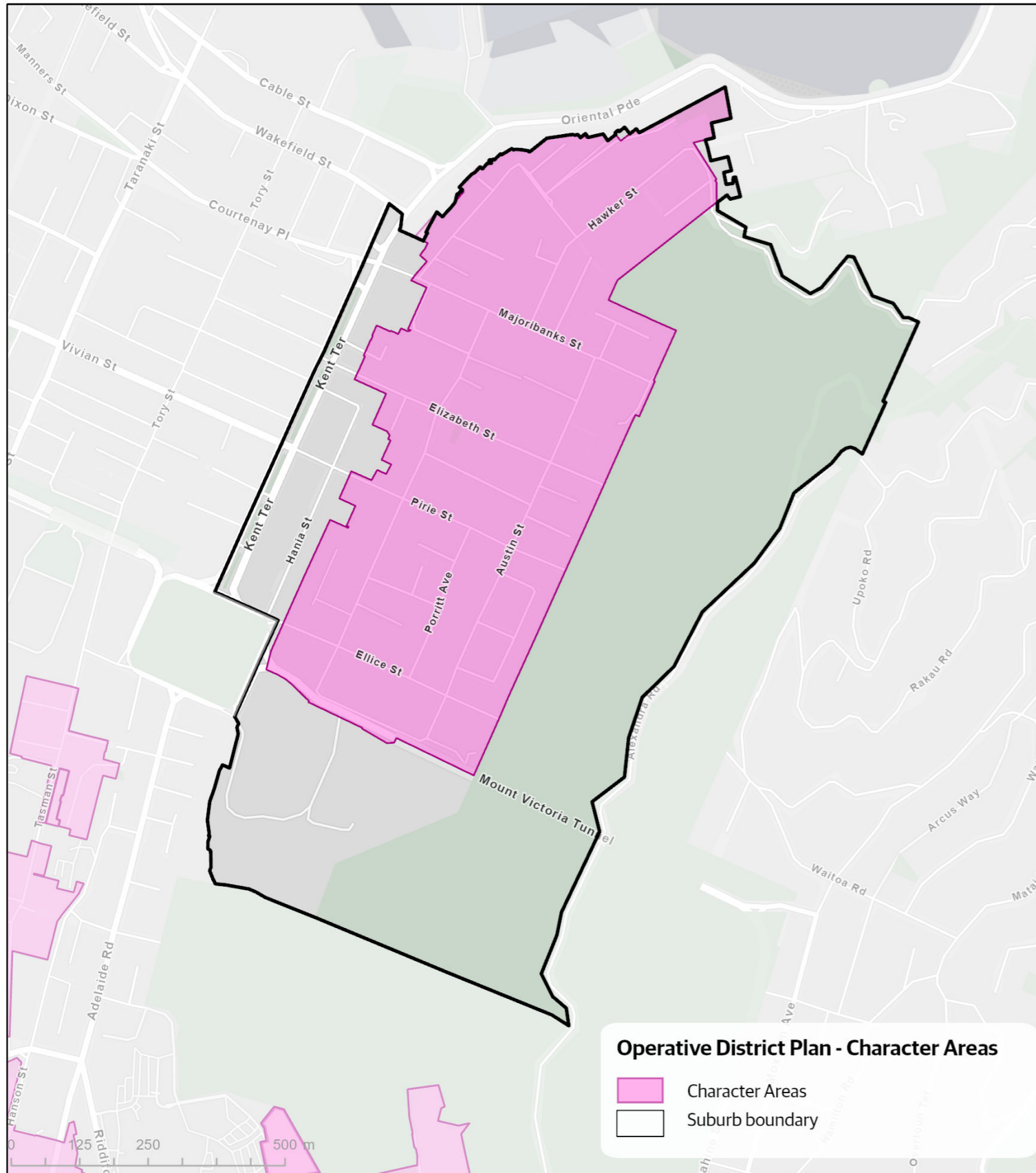
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Mount Victoria

Date: 15/07/2022

Created by: District Plan Team

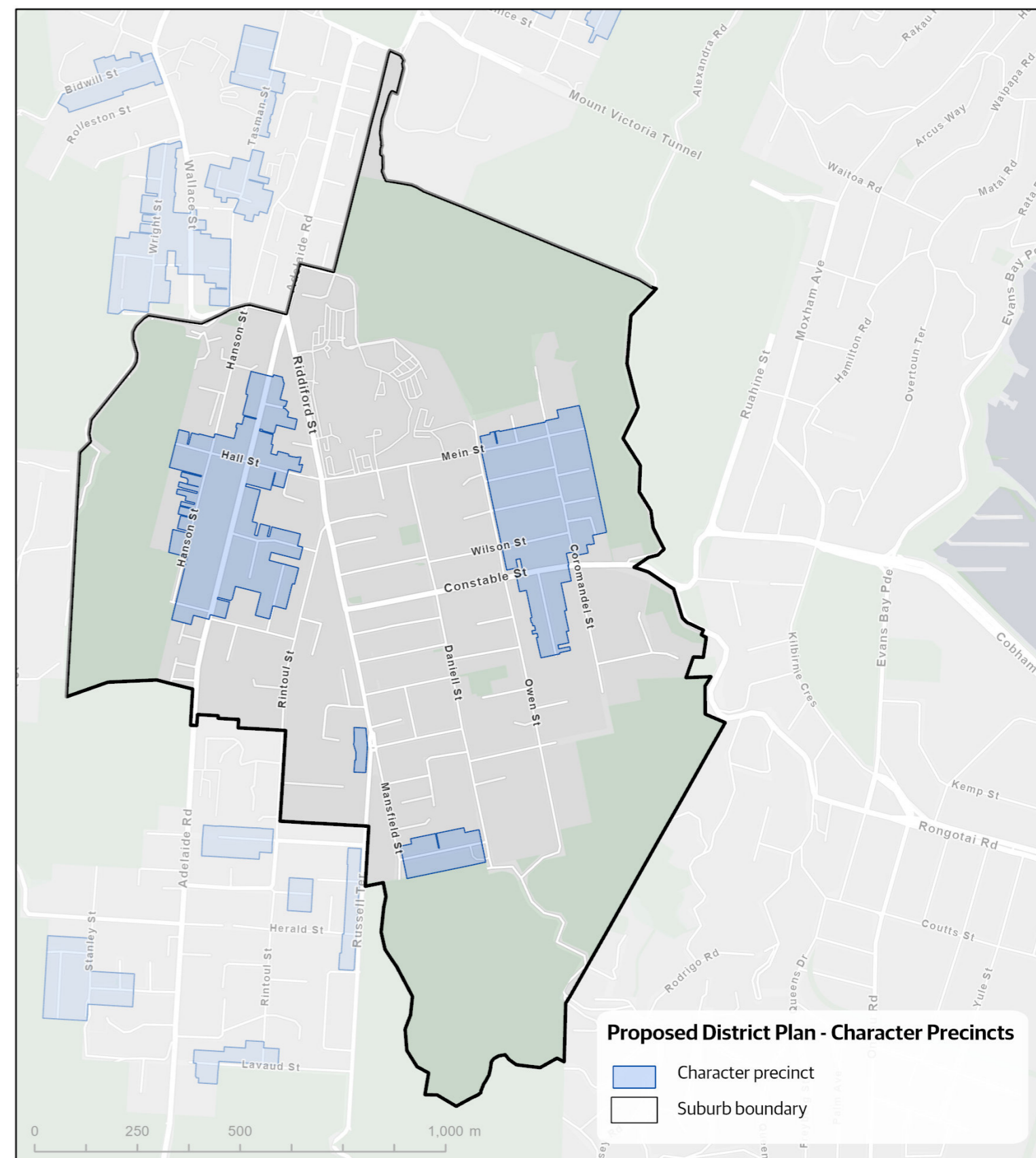
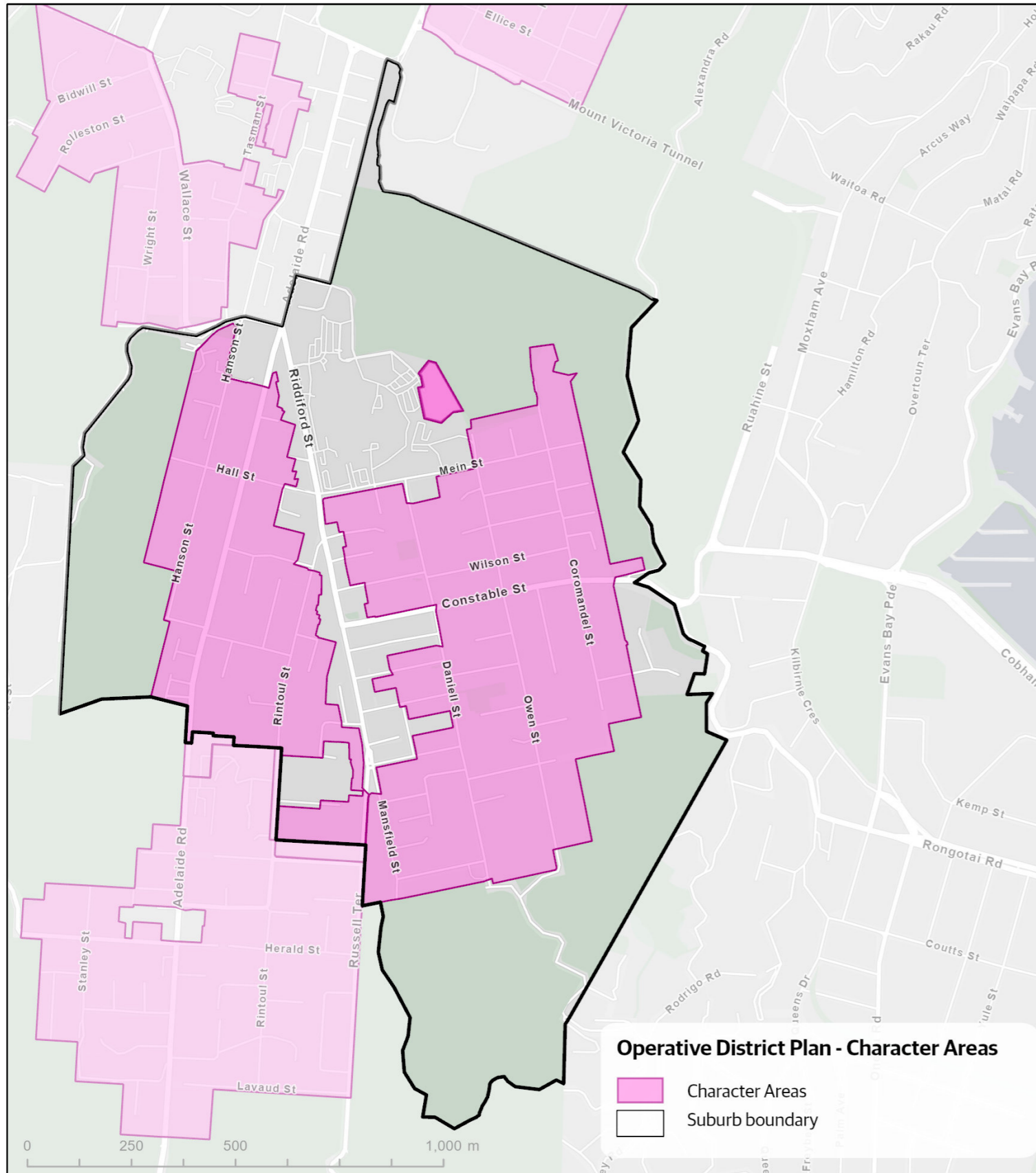
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts -Newtown

Date: 15/07/2022

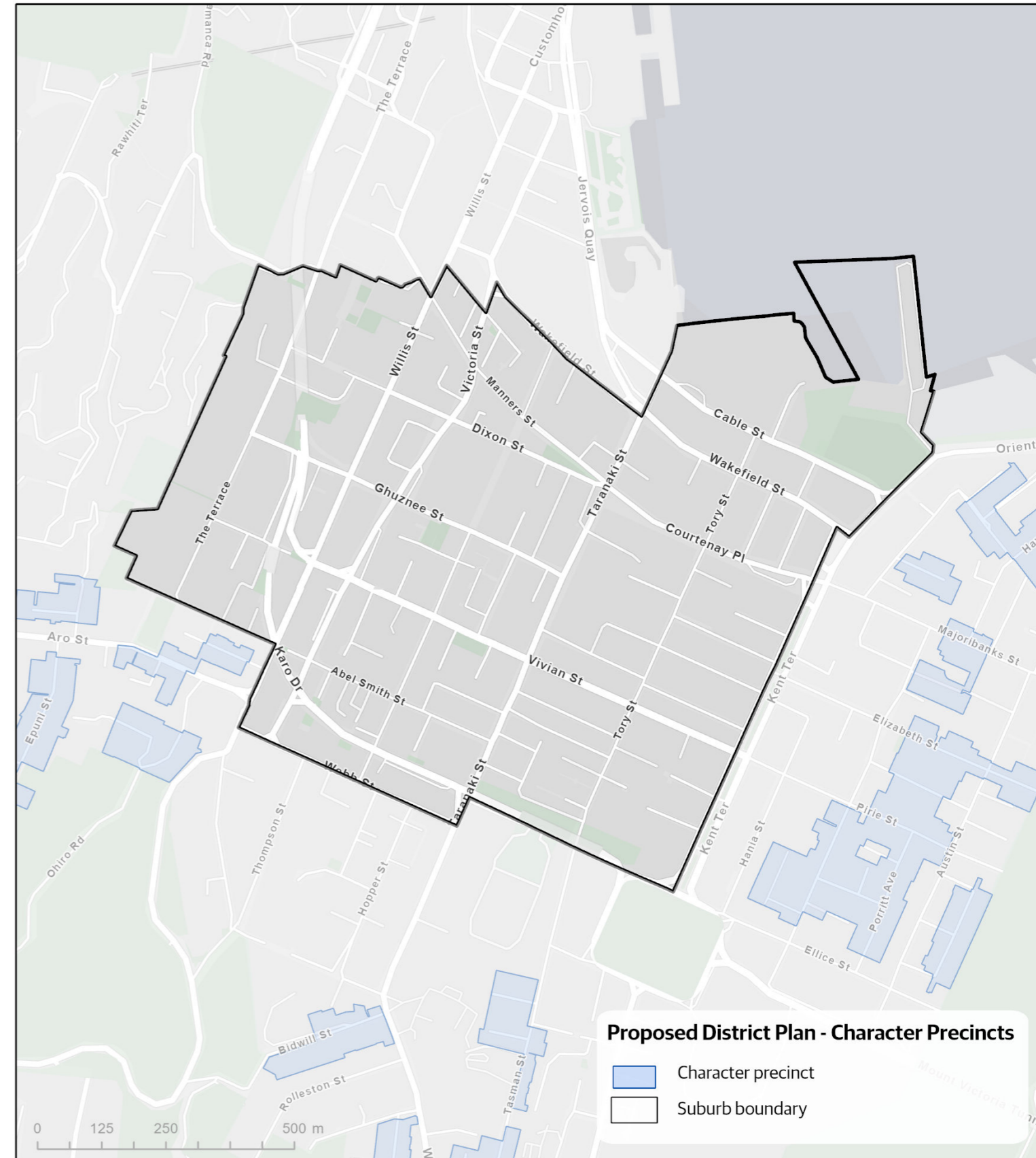
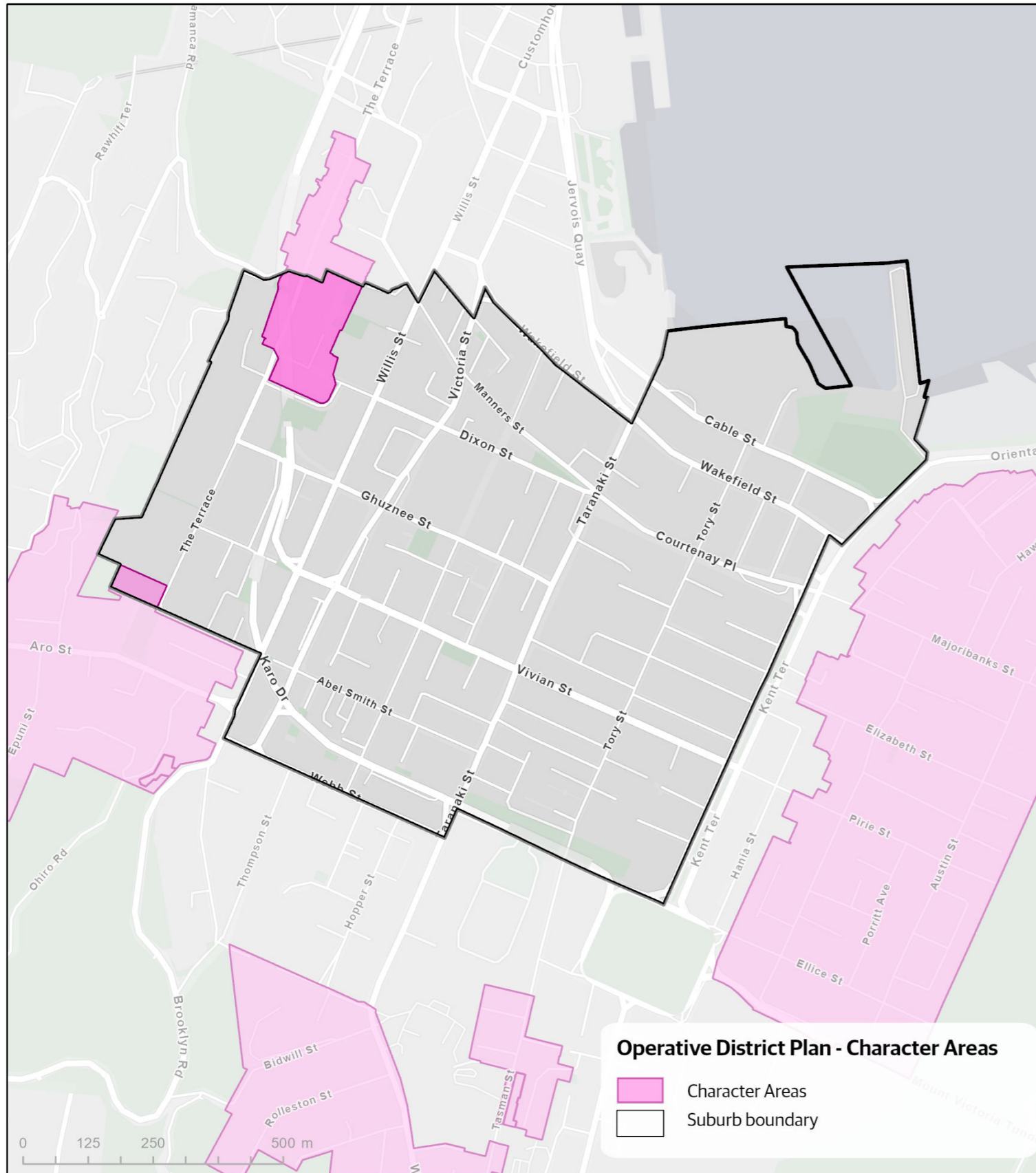
Created by: District Plan Team

Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Te Aro

Date: 15/07/2022

Created by: District Plan Team

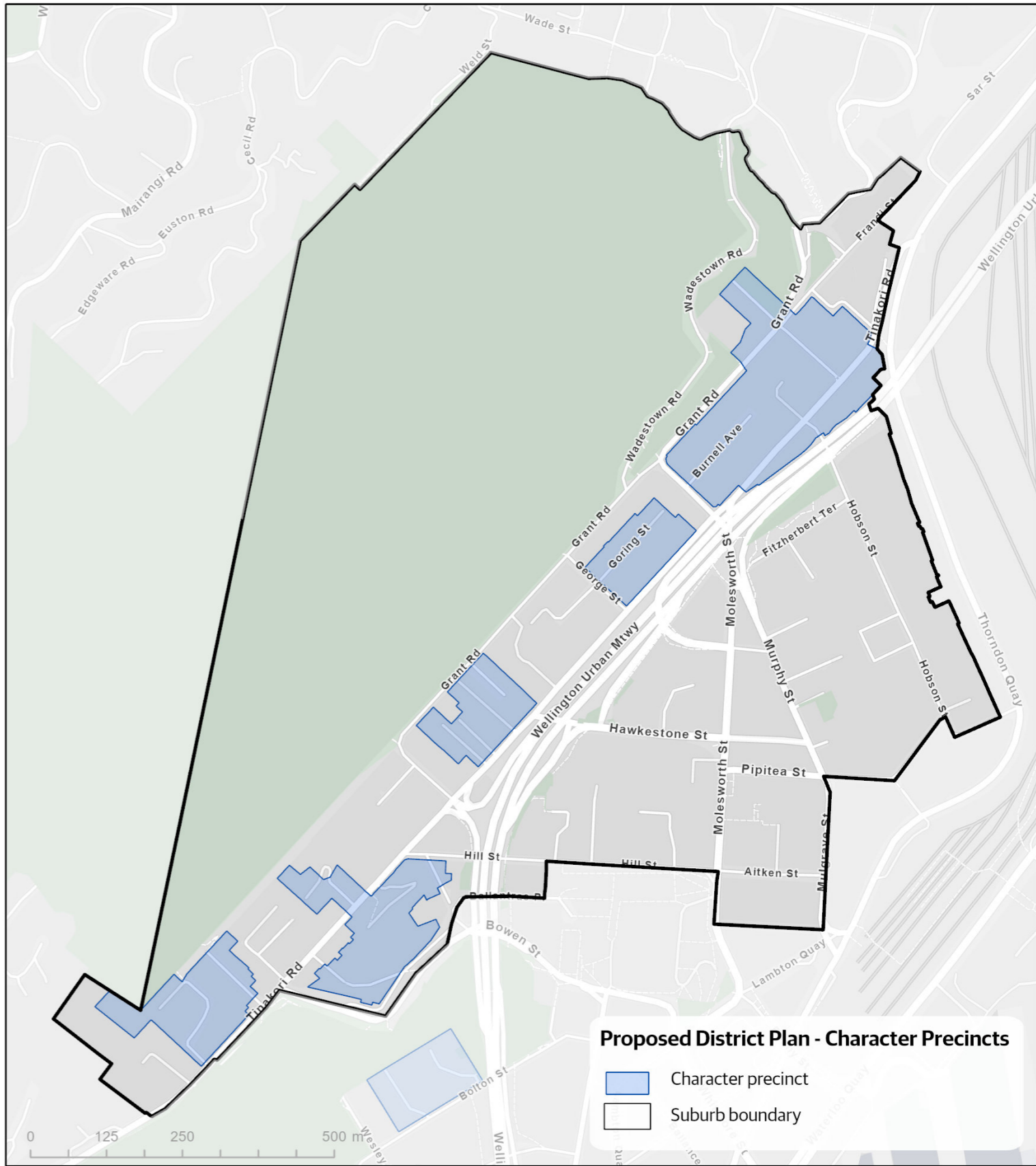
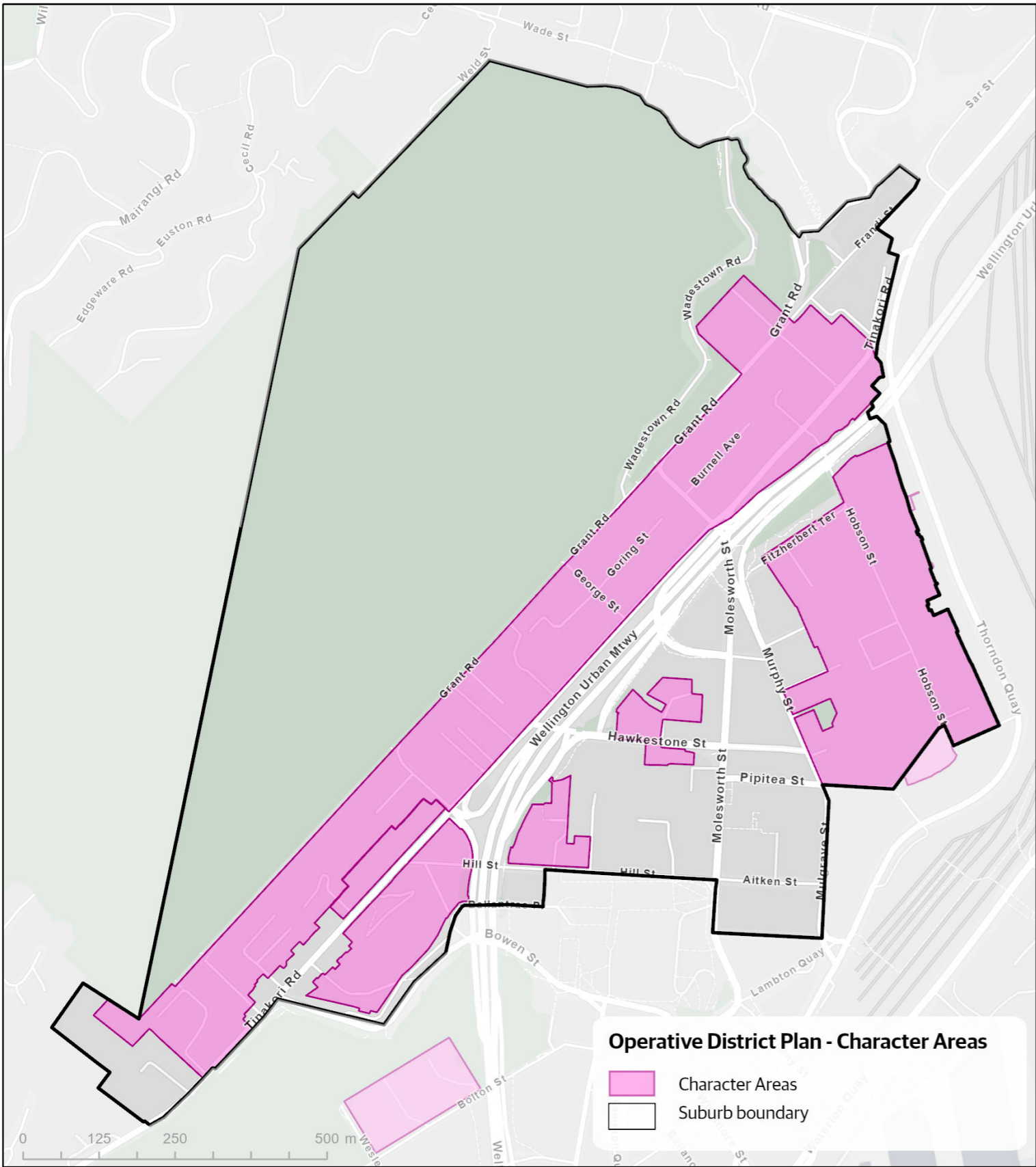
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

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Section 32 Report

Character Precincts



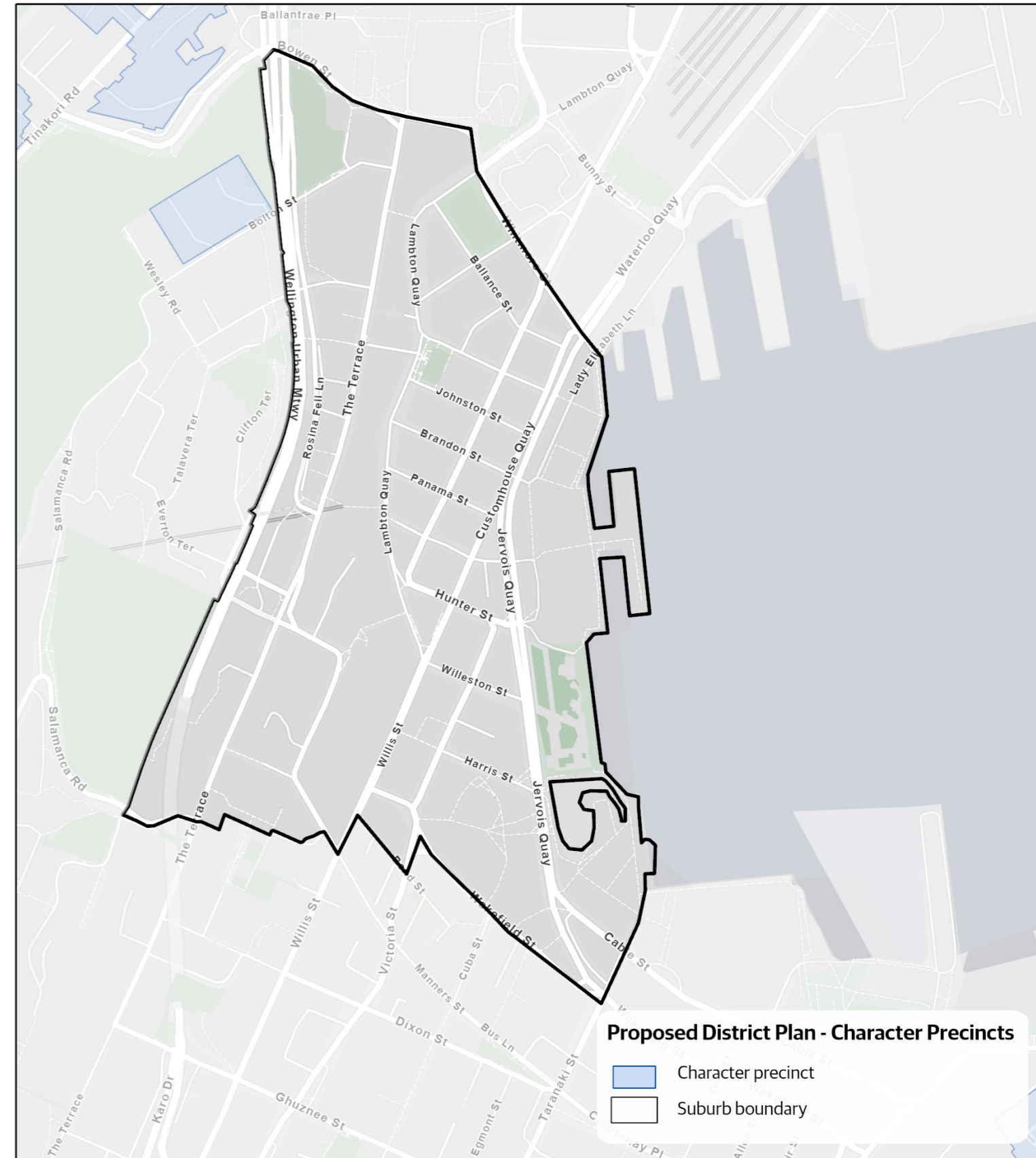
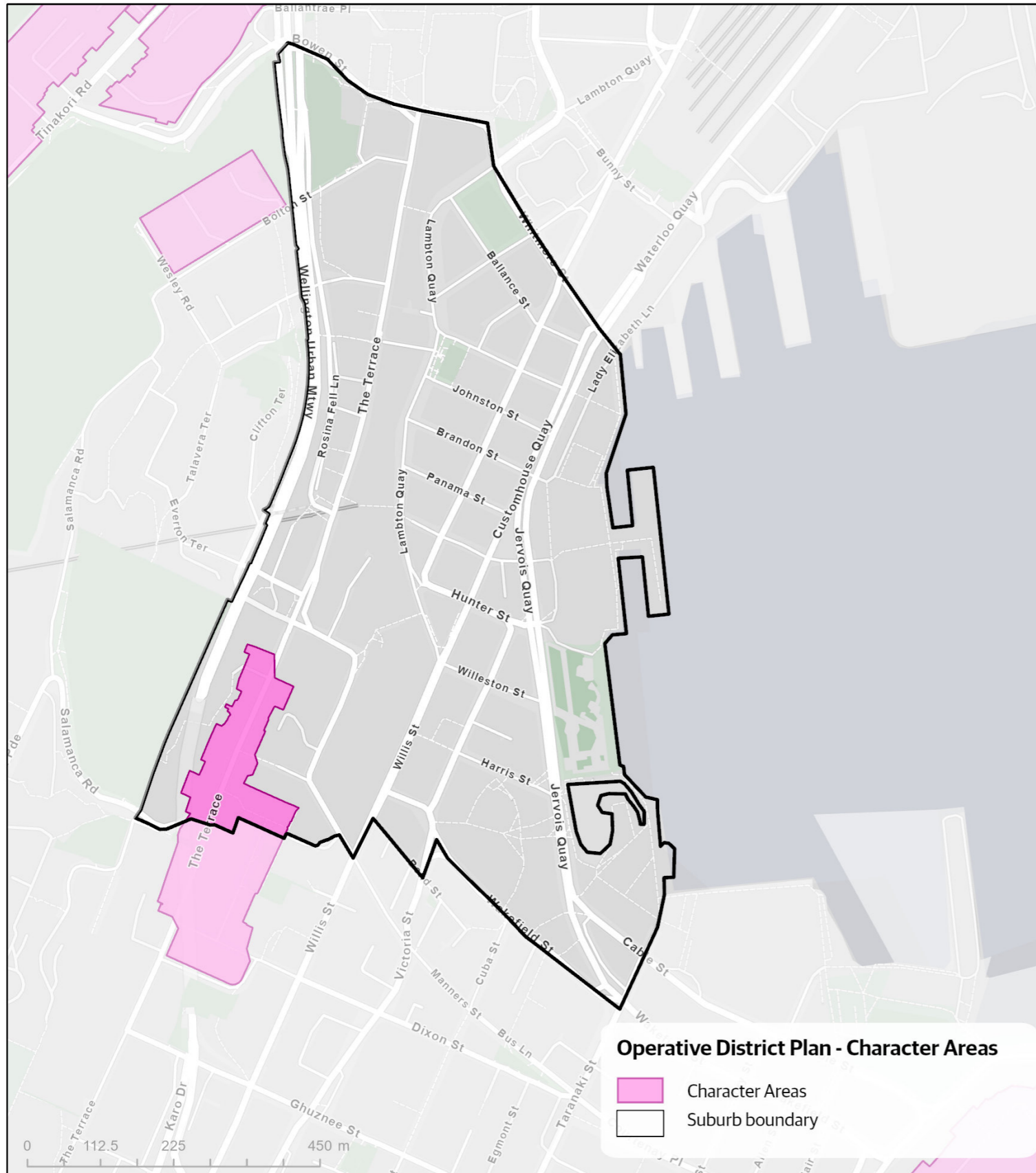
Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts -Thorndon

Date: 15/07/2022
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 Contact: planningforgrowth@wcc.govt.nz
 Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

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Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts -Wellington Central

Date: 15/07/2022

Created by: District Plan Team

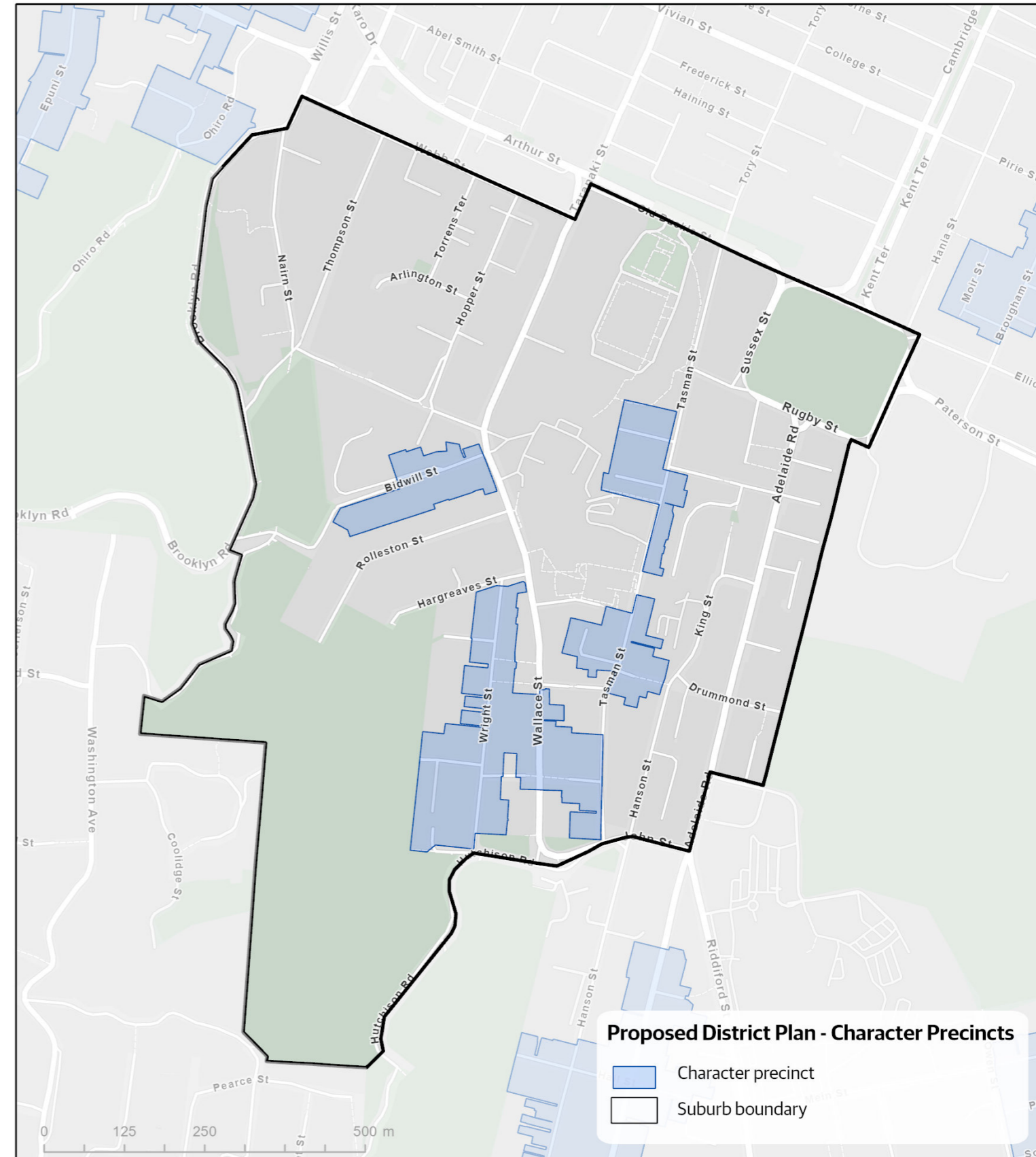
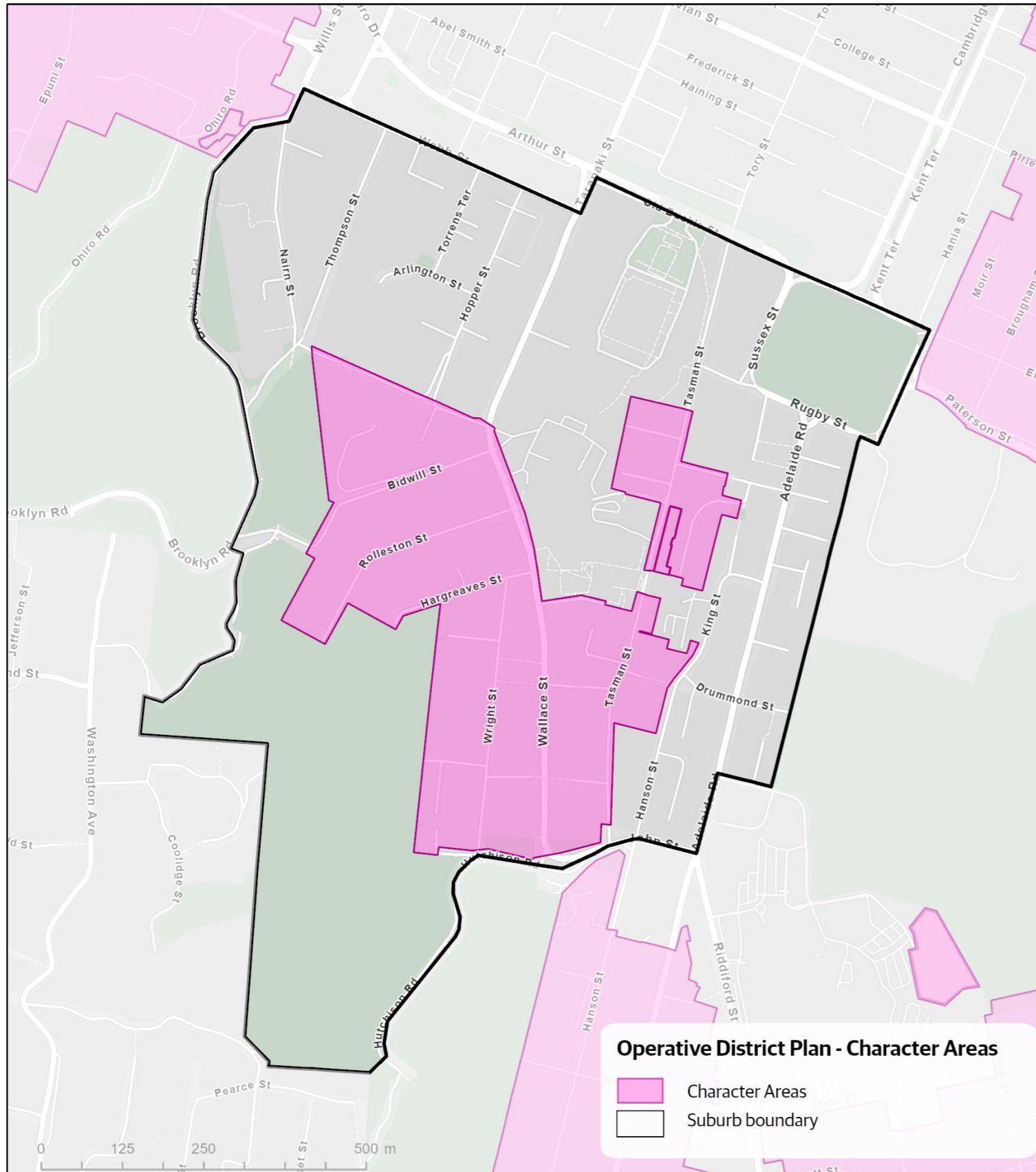
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: WCC, AAM, Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Operative District Plan Pre-1930 Character Areas vs Proposed District Plan Character Precincts - Mount Cook

Date: 15/07/2022

Created by: District Plan Team

Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz

Base map credits: Esri Community Maps Contributors, LINZ, Stats NZ, Eagle Technology, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS

Section 32 Report

Character Precincts



Indicative Character Contribution

- Primary
- Contributory
- Neutral
- Detractive
- Parcel Boundary
- Suburb boundary

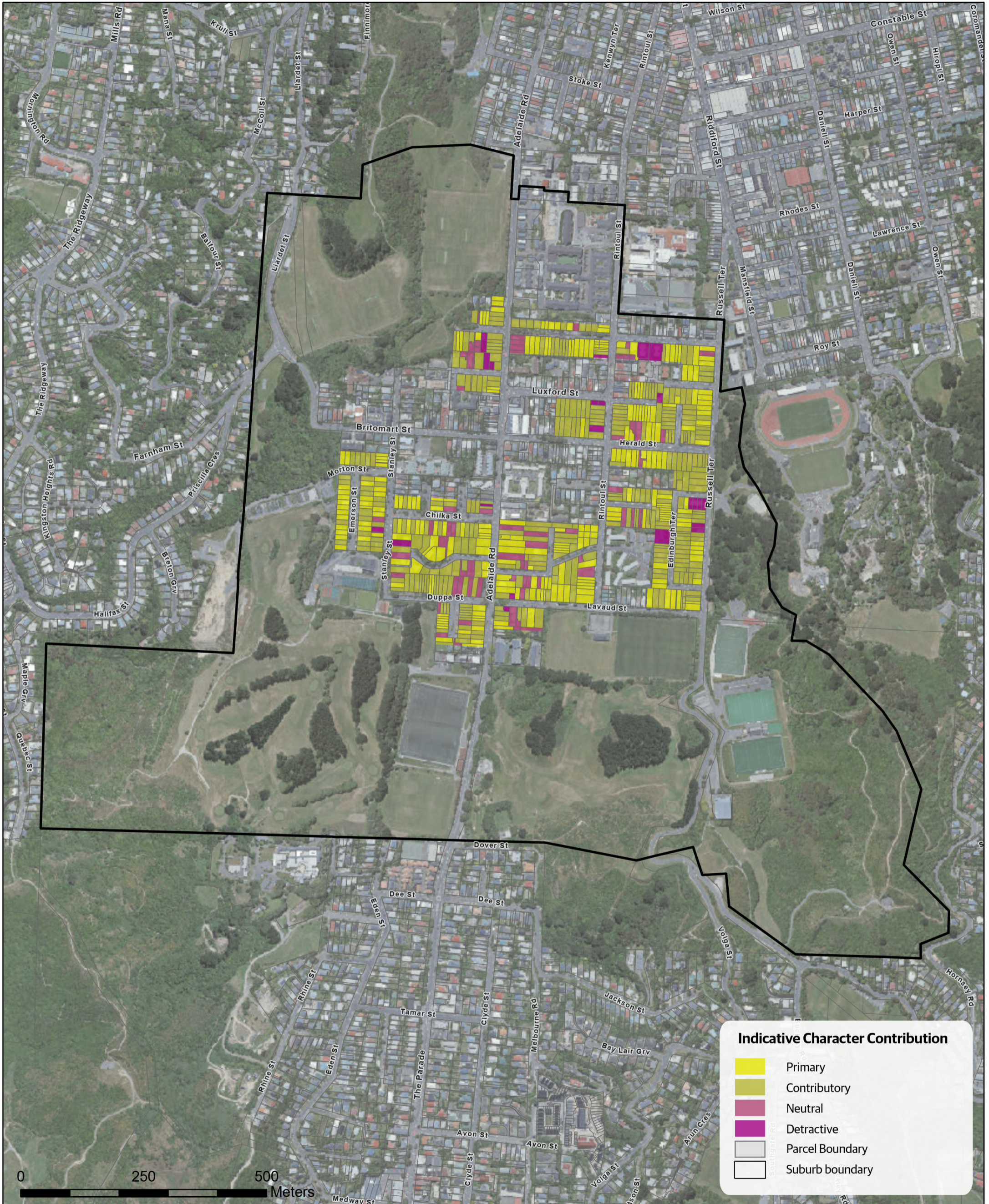
Pre-1930 Character Area Review - Aro Valley

Date: 19/04/2022
 Created by: District Plan Team
 Contact: planningforgrowth@wcc.govt.nz
 Website: planningforgrowth.wellington.govt.nz

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

Section 32 Report

Character Precincts



Pre-1930 Character Area Review - Berhampore

Date: 19/04/2022

Created by: District Plan Team

Contact: planningforgrowth@wcc.govt.nz

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Character Precincts



Pre-1930 Character Area Review - Kelburn

Date: 19/04/2022

Created by: District Plan Team

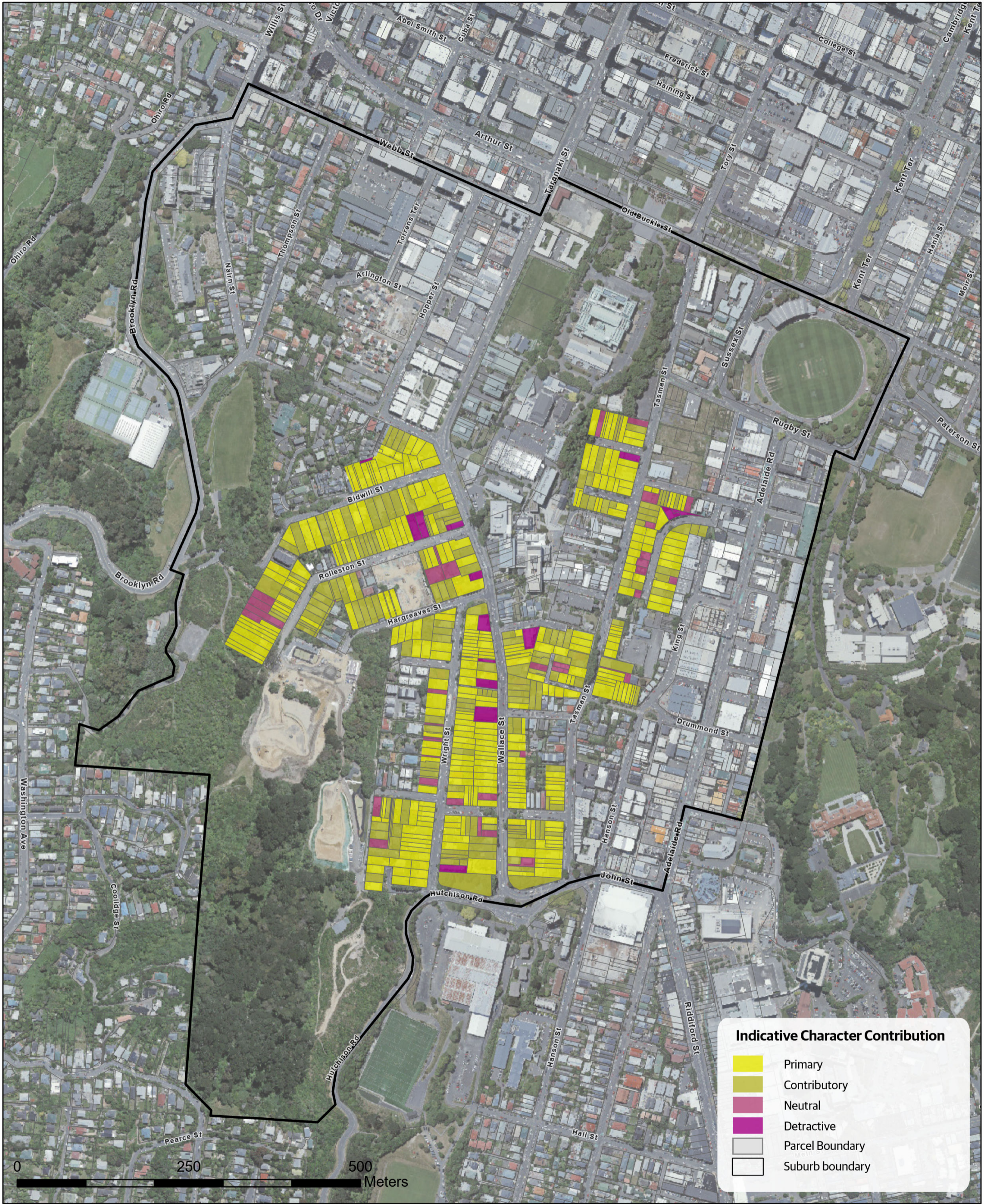
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Section 32 Report

Character Precincts



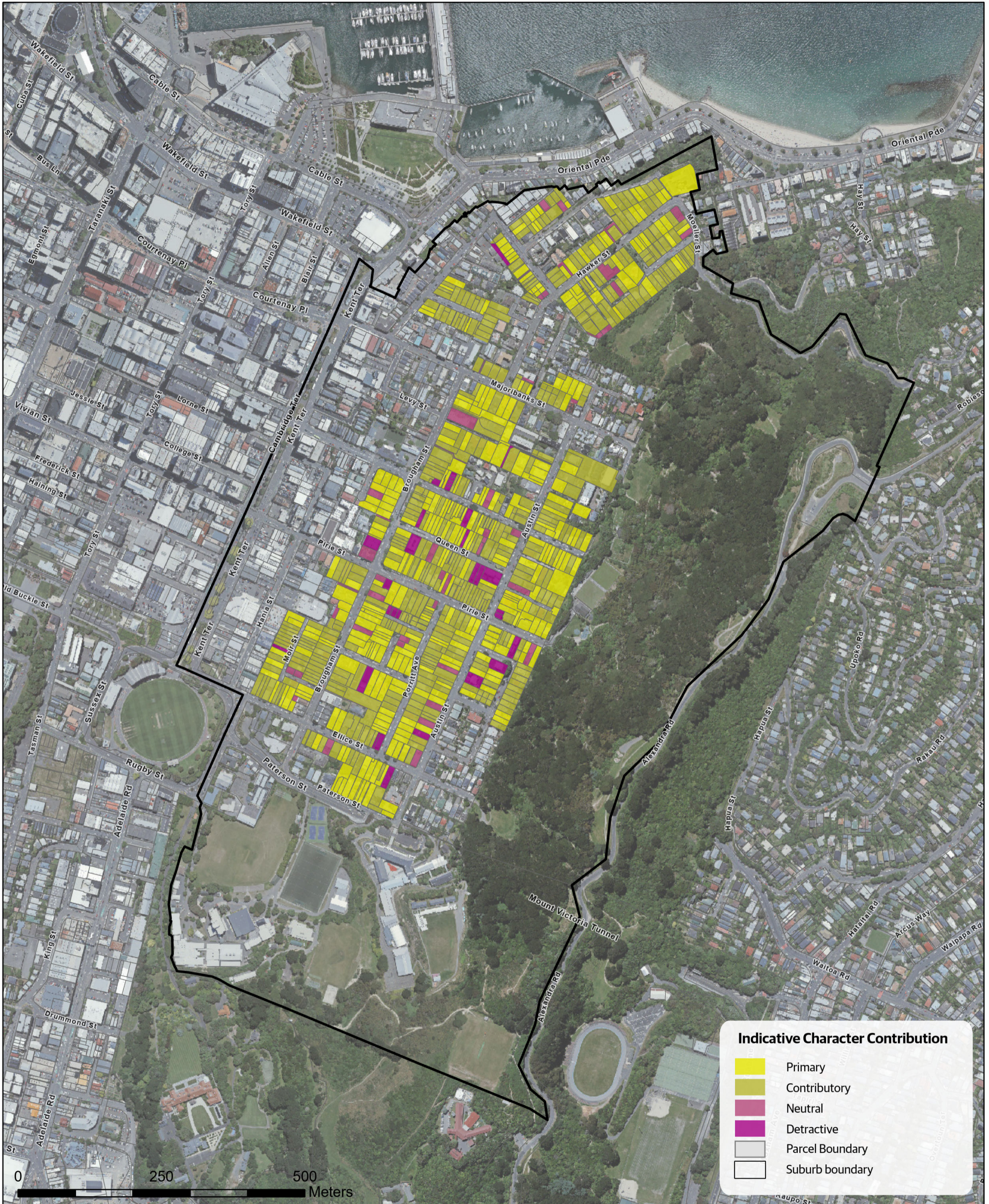
Pre-1930 Character Area Review - Mount Cook

Date: 19/04/2022
 Created by: District Plan Team
 Contact: planningforgrowth@wcc.govt.nz
 Website: planningforgrowth.wellington.govt.nz

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

Section 32 Report

Character Precincts



Pre-1930 Character Area Review - Mount Victoria

Date: 19/04/2022
 Created by: District Plan Team
 Contact: planningforgrowth@wcc.govt.nz
 Website: planningforgrowth.wellington.govt.nz

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

Section 32 Report

Character Precincts



Pre-1930 Character Area Review - Newtown

Date: 19/04/2022

Created by: District Plan Team

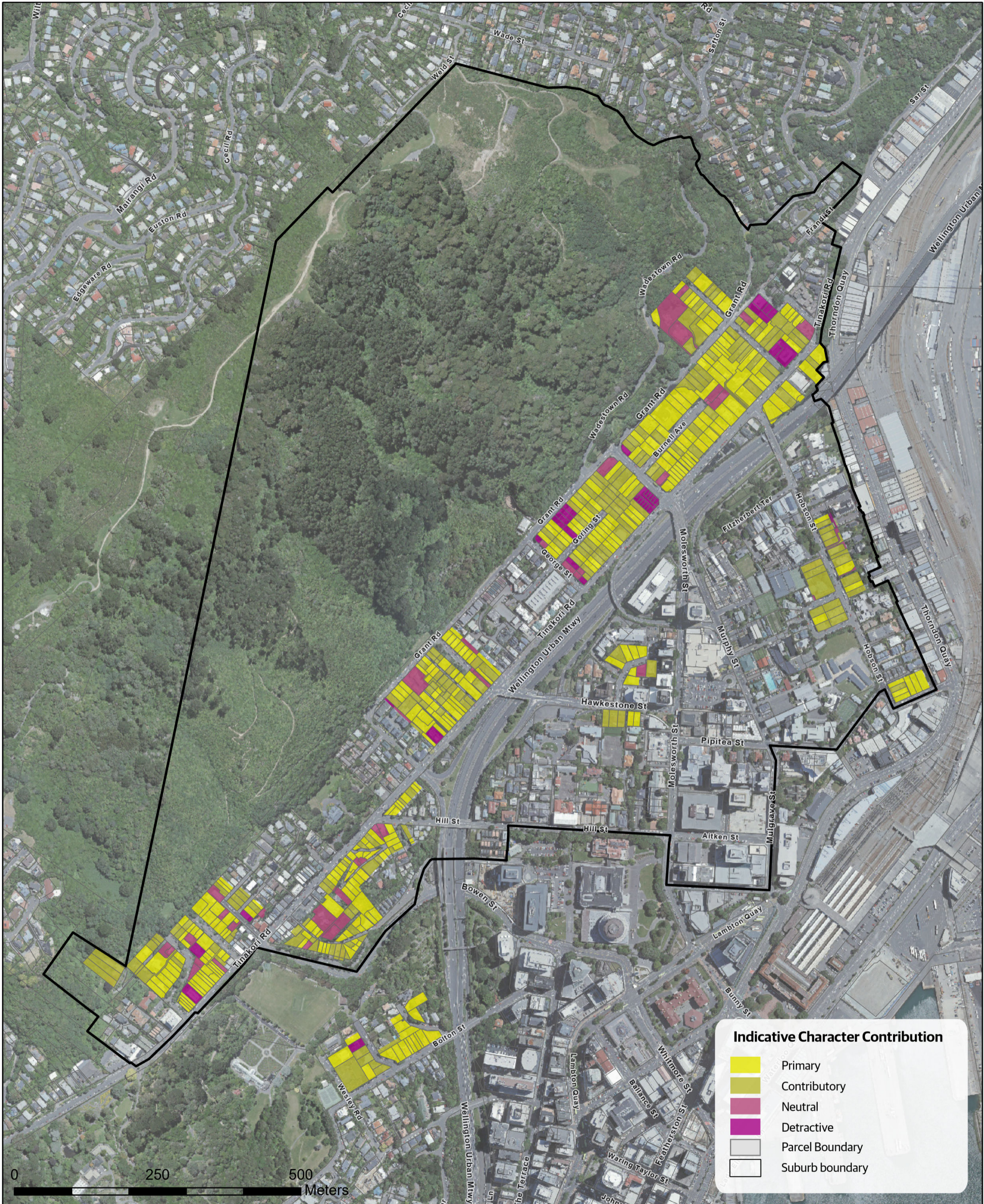
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Section 32 Report

Character Precincts



Pre-1930 Character Area Review - Thorndon

Date: 19/04/2022

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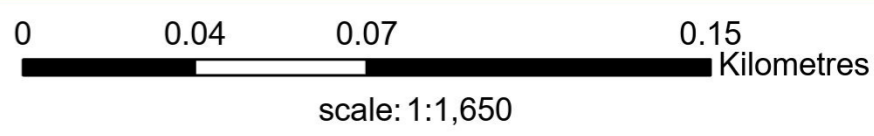
Contact: planningforgrowth@wcc.govt.nz

Website: planningforgrowth.wellington.govt.nz



Mount Victoria North Townscape Precinct and Mount Victoria Character Precinct (North Section) Boundary

Date: 12/07/2022 2:14 pm
 Created by: District Plan Team
 Contact: planningforgrowth@wcc.govt.nz
 Website: planningforgrowth.wellington.govt.nz



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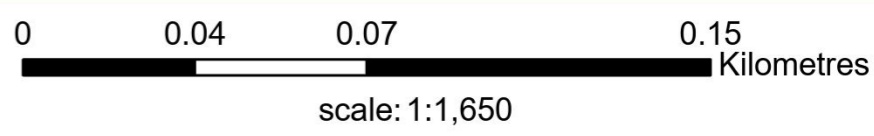


Legend

Mount Victoria North Townscape Precinct

Mount Victoria North Townscape Precinct Boundary

Date: 12/07/2022 2:17 pm
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 Website: planningforgrowth.wellington.govt.nz



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