

27 Feb 23

## **Submitter Statement by Historic Places Wellington**

### **Stream 1 - 1 March 2023**

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#### **1.0 Summary of key points**

This submission focuses on the issue of historic heritage protection for Wellington City.

HPW welcomes the gradual development in Wellington and did not oppose the NPSUD. HPW values the contribution to housing supply and community that more people within a compact city brings.

#### **1.1 Heritage: a Matter of National Importance**

1.11 In establishing the components of the District Plan the RMA itself lays out the duties and obligations. Protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance (s.6(f)). Section 6 RMA provides

*“In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:*

...

*(f) the protection of historic heritage from inappropriate subdivision, use, and development”*

1.12 Both the NPSUD and the RMA Enabling Housing Amendment Act recognised this by providing in s.77I for matters of national importance (s.77I(a); identified heritage sites (s.77I(g); and other matters (s.77I(j) to be exempted from intensification after site specific identification (s.77L). The framework for establishing the components of the District Plan is in s.74 including the hierarchy of regional plans and policies, and for heritage that means the Regional Policy Statement and the NPSUD.

1.13 The PDP as notified includes a heritage chapter and SCHEDs 1-3 which identify listed heritage buildings, areas and items (s.77I(g)). It also makes provision for character precincts within the residential provisions and addresses the circumstances in which buildings can be demolished (s.77I(j)). HPW says that there are further issues that need to be factored into the objectives of the plan and in the heritage and character provisions of the plan.

#### **1.2 Background to the issues around historic heritage protection**

1.21 What is, and what is not, reasonably practicable for historic heritage protection involves analysis and consideration of a range of practicable options for achieving the implementation

of the RMA and the NPS UD, while avoiding adverse effects on the functionality of the urban environment.

1.22 We support existing listings and have proposed a few additional listings for specific buildings but we were not involved in any systemic work or analysis. We argue that the demolition rule in the Operative Plan is the most practicable way of preserving important historic heritage which will be at risk from intensification in lieu of such analysis and evidence.

1.23 The National Policy Statement on Urban Development refers in Policy 3 to district plans enabling building heights of at least 6 stories within at least a walkable catchment of the edge of the city centre. The “walkable catchment” (however defined or measured) encompasses all of Wellington’s oldest inner city suburbs which were mapped site by site by Thomas Ward in 1892.

<https://wcc.maps.arcgis.com/apps/webappviewer/index.html?id=59a785549d684ce18d541d4a34808ef6>

1.24 Identification of other means or options for achieving the purpose of the Act and the objectives of the plan to be evaluated is qualified in s.32 of the Act by the words “reasonably practicable”. That calls for consideration of whether avoiding adverse effects on historic heritage is or is not "practicable." The existing rule in the operative plan requiring a resource consent prior to demolition of pre-1930 buildings is “practicable”.

1.25 We argue that the characteristics of historic heritage have not been systematically identified in older inner city suburbs currently protected by the requirement to obtain a resource consent prior to demolition of pre-1930s buildings. The identification of specific sites for heritage protection would be practicable but has not been fully achieved by systemic study for Wellington’s historic heritage in its oldest inner suburbs.

1.26 The only areas which have been subject to such a review was the Mt Victoria heritage study by Michael Kelly and material assembled for Thorndon. Some of those areas subject to the Kelly report are now proposed for heritage protection.

No comparable study has been done for The Terrace, Aro valley, Mt Cook, Newtown or Berhampore. The absence of any survey or evidence about specific historic heritage in those areas is a serious omission and a precautionary approach to removal of protection would be appropriate. (HPW will expand will expand on these issues in streams 2 & 3.

### **1.3 Strategic Directions**

#### **1.31 Capital City CC- 02 -**

HPW supports the proposals of Heritage Professionals to make amendments to the objectives of the Plan and to emphasise more strongly the importance of historic heritage to liveability and to specifically refer to it in Strategic Objective: Capital City CC-02. The proposal is for that provision to read:

“6. Values and characteristics that are an important part of the City’s identity and sense of place, including historic heritage, the natural environment and sites and areas of significance to mana whenua, are identified and protected.”

1.32 Historic Heritage and Sites and Areas of Significance to Maori – Title  
HPW identifies an ambiguity with this chapter heading which needs clarification. Perhaps a comma after heritage?

1.33 Historic Heritage, and Sites and Areas of Significance to Māori P1 Sch Introduction  
While heritage buildings are generally recognised in this introduction, the significant resource of unique timber heritage and character housing and neighbourhoods is not recognised and valued at a strategic level. We recommend this is included.

## **2.0 Value of old timber houses and neighbourhoods**

2.1 Wellington’s unique identity – houses in the hills, pedestrian walkways and steps, views

2.2 Irreplaceable native timbers

2.3 Classical design and construction

2.4 Simple lifestyle

2.5 Resilient – light flexible in earthquakes

2.6 Sustainable – maintenance and repair the greenist option<sup>1</sup>

2.7 Regenerative for energy efficiency

2.8 Local craftspeople = circular economy + productive labour

2.9 Opportunity for WCC to celebrate

2.10 Old stories enrich the present

## **3.0 Balance between intensification and built heritage?**

Max Rashbrooke offers the following advice.<sup>2</sup>

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<sup>1</sup> Brenda & Robert Vale (2021) *Old or Green. Is the greenest building an old building?* Historic Places Wellington <https://vimeo.com/643804788>

<sup>2</sup> Max Rashbrooke (2021) *Want to build high-rise homes for 74,000 more people in Wellington? Build Consensus first.* Guardian <https://www.theguardian.com/commentisfree/2020/sep/06/want-to-build-high-rise-homes-for-74000-more-people-in-wellington-build-consensus-first>

*“People often feel more relaxed about change if they have a modicum of control over it. And in a good, well-facilitated environment, one where people are encouraged to listen deeply to the arguments of others, consensus can be reached where it seemed impossible. People who shout slogans at each other in vox pops or newspaper front pages can find surprising common ground.*

*Such results could be expected in Wellington or indeed elsewhere. It’s easy to laugh at older left-wingers opposing the housing so badly needed by those they claim to help. But what if baby-boomer fears about densification turn out to be legitimate concerns about what private developers will build if left to run rampant? What if, once they hear good arguments in a relaxed setting, their concerns can be assuaged by stringent rules that ensure high-quality architecture?*

*What if, conversely, young people who see no merit in draughty old villas come to better understand the value of built heritage, the stories of old houses and neighbourhoods that can so profoundly enrich the present? What if they realise that some suburbs do need more protection than the city council’s plans allow, and that mouldy houses can be improved, not just demolished?*