

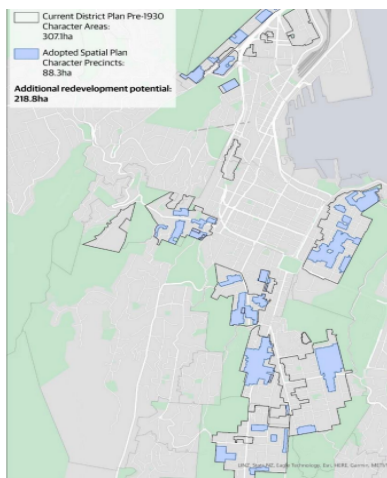
IF WE DO NOT HONOUR OUR PAST
WE LOSE OUR FUTURE
IF WE DESTROY OUR ROOTS
WE CANNOT GROW
(Hundertwasser)

Submission on behalf of Claire Nolan, James Fraser, Biddy Bunzl,
Margaret Franken, Michelle Wolland, and Lee Muir
Stream 2, 4 April, 2023

This part of our submission follows the qualifying matters track in proposing, amending, opposing, and supporting, in particular, the contents of the PREC01 Character Precincts of Newtown. It also provides a case for expanding the purview of the character precincts classification in a number of streets in Newtown.

1. We submit that the Proposed District Plan (PDP) allows for the removal of too many character dwellings in inner-city suburbs – and Newtown is contributing a relatively large area as “targeted character precincts”.

In the current operative District Plan, 307ha of land within the inner suburbs is classified as a “pre 1930s character area”. . . . [T]he Adopted Spatial Plan has removed the pre-1930s character overlay and instead replaces it with smaller “Character Precincts” which make up a total of 88ha of land within the inner suburbs. This decision has resulted in an additional 219 ha of land . . . than is currently provided for under the operative District Plan (Wellington City Council, 2021 , September).



This map shows how much Newtown’s character was “targeted”.

Figure 1: Remaining character areas in Adopted Spatial Plan (blue shaded areas) within suburb boundaries

2. We submit that estimated growth distribution figures will place too much stress on Newtown.

There is also the assumption in the Adopted Spatial Plan/Proposed District Plan that Newtown will absorb more people, and have more dwellings than any other inner-city suburb.

Table 1: Comparison of Adopted Spatial Plan and Officer Recommended Spatial Plan estimated growth distribution figures for the inner suburbs (from Wellington City Council, (September, 2021)).

Suburb	Officer Recommended Spatial Plan		Adopted Spatial Plan (with Councillor decisions applied)		Estimated dwelling and population increase/decrease	
	Estimated Dwellings	Estimated People	Estimated Dwellings	Estimated People	Estimated Dwellings	Estimated People
Aro Valley*	95 to 215	240 to 540	180 to 270	445 to 675	+50 to +80	+130 to +210
Berhampore	120 to 275	285 to 650	175 to 300	410 to 705	+25 to +55	+55 to +120
Kelburn	305 to 550	760 to 1,380	370 to 605	920 to 1,510	+55 to +65	+30 to +160
Mount Cook*	110 to 200	270 to 505	120 to 220	300 to 545	+10 to +20	+25 to +40
Mount Victoria*	120 to 200	290 to 475	150 to 250	360 to 600	+30 to +50	+75 to +120
Newtown	340 to 650	900 to 1,725	460 to 750	1,215 to 1,945	+80 to +120	+220 to +315
Oriental Bay**	20	45 to 50	25 to 30	55 to 70	+5 to +10	+10 to +20
Thorndon*	95 to 290	200 to 440	40 to 130	80 to 265	-85 to -60	-125 to -175
Inner suburbs total	1,200 to 2,300	3,000 to 5,800	1,500 to 2,500	3,800 to 6300	+200 to +300	+500 to +800

* Does not include Central City Area dwellings
** Does not include Central City Area dwellings or Oriental Bay Height Area

“ . . . High population density can promote sustainable development if planned for appropriately, but conversely it can also place a heavy burden on the surrounding environment” (Massey University, 2014).

3. We submit that Newtown already has population density.

Wellington City: 735 people/km²

Newtown South (includes the zoo, Newtown park, Mt Albert, Mt Albert park, some town belt): 3,364/km²

Newtown West: 5,643/km²

Newtown North (includes the hospital, Government House, some town belt): 2,896/km²

(2022 data from: <https://www.citypopulation.de/en/newzealand/wellington/>)

4. We submit that UGOS (urban green and open spaces) are part of Newtown’s character and should be preserved as much as possible.

Newtown is configured in many small pre-1930s dwellings with access to small private gardens or UGOS - urban green and open spaces. “Private UGOS such as gardens and allotments complement public UGOS in terms of the values they confer, and constitute significant portions of the total green space in many cities” (Blaschke et al., 2017, p.18). We need to preserve UGOS of this nature in the process of urban intensification.

References

Blaschke, P., Chapman, R., Randal, E., & Preval, N. (2017, May). *Does population density affect access to and satisfaction with urban green and open spaces? A review for the Resilient Urban Futures programme strand on compact and dispersed development.*

<https://www.sustainablecities.org.nz/sites/default/files/2021-11/Blaschke-Chapman-et-al-30may17-on-Density-and-UGOS-final-delinked.pdf>

Massey University (2014). *Environmental health indicators New Zealand.* <http://www.ehinz.ac.nz/assets/Factsheets/Released-2014/EH13-PopulationDensityByTA2013-released201407.pdf>

Wellington City Council, (2021, September). *Our city tomorrow: Spatial plan for Wellington city. Updated city-wide estimated growth distribution figures.*

5. We welcome and support the Officers’ s.42a evaluation report (Character Precincts and Design Guides) extending the character precincts from those identified in the PDP.

6. We propose that there be an extension of the notified character precinct to include all the houses recommended in the Officers’ s.42a evaluation report.

The recommended extension of the character areas largely aligns with those areas identified in our written submission #275, identified in the ORP (Officers’ Recommended Plan), and listed below:

Streets/houses identified in the ORP (see written submission #275 for photos and details of identified houses):

Balmoral Tce, Blucher St, Coromandel St, Daniell St, Harper St, Lawrence St, Owen St, Stoke St
(And in addition, streets/houses identified by Hilary Watson).

7. We propose that there be an extension of the notified character precinct to include houses on two sets of adjacent streets: Emmett St and Green St; and Donald Maclean and Normanby St. These were not identified in the ORP and neither do they feature in the Officers’ s.42a evaluation report, but are of high character value. They represent some of the oldest houses in Newtown, and in Wellington.

The houses on these streets have a significant streetscape appeal and are intact pre-1900 houses in many cases – although in some cases there has been some modification of their elevations (e.g. newer windows). Fifty percent (or close) of the houses in Green, Emmett and Donald Maclean Streets have a primary categorisation in Boffa Miskell’s analysis. For Normanby St, over 75% of the houses are either primary or contributory. We propose therefore that the following sites be exempt from intensification and be covered by character precinct rules:

Emmett St	One side only; 6, 8, 10A, 12, 14, 16, 18, 20
Green St	1, 5, 7, 7A, 9, 13, 15, 17, 19; 2, 2A, 4, 6, 10, 12, 14, 18, 20 Almost all the houses in Green St appear on the Thomas Ward map of 1892 except for #10 which was a vacant site at the time.
Donald Maclean St	16, 24, 28, 30, 36, 38; 17, 19, 21, 25, 27, 29, 31, 33, 35, 37
Normanby St	12, 14, 16, 18, 20, 22, 24, 30, 32, 34; 19, 21, 23, 25, 27, 29, 31, 33, 35, 37, 39, 41 (And in addition streets, identified by Michael Kelly and Andy Foster: Minerva Tce and lower Wilson St).

Options concomitant of QMs (related to areas not included in the s.42A evaluation report)

- We suggest that the MDRS allows for a significant number of new dwellings to be built – on some of the larger sites in Newtown.
- We contend that there is additional capacity if the Council heeds Red Design Architects’ and (Martin Hanley’s) proposal to enable taller development in the Newtown character housing areas along Riddiford St.
- Alternatively, we may, in stream 3, propose for these streets to be listed as heritage areas.

We support:

1. Live Wellington’s oral submission in support of extending the character precincts as identified in s.42a.
2. Ros Bignell’s view [186.6] that new residential building should be well designed and complementary to the current streetscape of Newtown.
3. Hilary Watson’s submission (#321) on extending character precincts and including houses not identified in s.42a.
4. Andy Foster’s written submission, point #50 “there remain some areas left outside the proposed character areas where the high degree of coherence and/or contiguity with existing proposed character areas clearly warrants existing Operative District Plan protections to be continued”. With respect to Newtown this refers to the additional houses identified above – and in addition includes the lower section of Wilson St. This also refers to Minerva St – as identified in Michael Kelly’s Statement of Evidence point #16.
5. Douglas Brett Mackay’s comments on the demolition rule, point #46: suggested amendments to MRZ-PREC01-P2, Restrictions on demolition.
6. Red Design Architects’ and (Martin Hanley’s) proposal to enable taller development in the Newtown character housing areas along Riddiford St.

We oppose:

1. Kāinga Ora’s written submission (#391): to replace the “Character Precincts” with “Character Areas” which provides a character overlay approach - this will not result in maintaining character values; and to designate that the areas identified as Character Precincts in the PDP are zoned high density residential.
2. Generation Zero’s hyperbole that “the best quality land is locked away by wealthy citizens” for Newtown, and other aspects of their argument related to their desire to oppose extending character areas in the PDP.