

Speaking notes for Wellington Proposed District Plan Hearing Stream 2

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Statement of Supplementary Planning Evidence of Mitch Lewandowski

Pre-1930 Character Area Review

1. Paragraph 28 of the Wellington Heritage Professionals' submission put forward the view that the Pre-1930 Character Area Review report was flawed.
2. In our view, the quality of this report remains a concern, even though the extent of the character areas proposed in the Review has been reduced significantly in the Proposed District Plan. It remains a concern because we understand that some submitters have argued for a return to the extent proposed in the Review. Our view is that the plan should not revert to the extent proposed in the Review because its findings cannot be relied upon. In our view, the plan should either revert to the extent of the character areas in the Operative District Plan or the Council should reassess the character areas using an appropriate methodology.
3. At paragraphs 33-36 of his rebuttal evidence, Mr Lewandowski gives his reasons for remaining of the opinion that the approach adopted in the Review is appropriate. Mr Lewandowski also notes that we have not considered development capacity impacts, nor any wider assessment of how our suggested approach responds to the NPS-UD. While development capacity is outside of our expertise, we do have some knowledge of the NPS-UD and consider that the site-by-site analysis in the Review that could be used to justify an exemption from the NPS-UD as a character precinct has been flawed, as we will outline.
4. We continue to hold the view that the methodology used in the review was flawed, and our reasons are as follows:
 - 4.1. Firstly, the methodology was based on an earlier study that was for a different purpose. At section 1.3 the review notes that the methodology was 'informed by, and built upon, the approach applied to the Mt Victoria character area in the 2017 Heritage Study'. This study was for examining the historic heritage values of Mt Victoria, not assessing character.¹
 - 4.2. The second reason is that the 2017 Mt Victoria study that the review was based on concluded that the method it used had limitations due to its focus on levels of integrity and stated: *This method had some limitations because it was not apparent at the time the project began that much of the housing stock was altered during the 1920s. In fact, the widespread renovation of houses in*

¹ 'This project was instigated by the Wellington City Council (WCC) to examine the historic heritage values of Mt Victoria, in particular its stock of predominantly Victorian and Edwardian housing'. Mt Victoria Heritage Study Report 2017, WCC, p.4.

*Mt Victoria during the 1920s is one of the most important characteristics of the suburb and a key source of historic heritage value.*²

- 4.3. The third reason is that the focus on integrity and cohesiveness in the character assessment at section 1.4 of the review does not align with the methodology section.
- a. The methodology at section 1.3 outlines the data fields to be collected and analysis to be undertaken.
 - b. At section 1.4 Character Assessment the review then outlines the approach taken ‘to determine the level of integrity and cohesiveness’. This is a logistical leap as there is no mention in the methodology section that integrity and cohesiveness are attributes to be collected.
 - c. This approach means that properties deemed to make a primary contribution are ones ‘where attributes referred to at section 1.3.2 are largely intact/exhibited and predominantly illustrate the characteristics described in the relevant residential design guide’ are determined to make a primary contribution.
 - d. It is difficult to see how this could be applied in any sensible way to Mt Victoria given that the residential design guide (at Appendix 3 of the review) notes that ‘external appearance of buildings often assumes a hybrid character due to repeated alterations/additions’. This demonstrates that what is valued in Mt Victoria is not intactness and integrity but the pre-1930 character which is choc-full of 1920s adds and alts as described in the 2017 study.
5. The legend provided for the maps in Appendix 4 does not identify what the grey areas are. The implication is that these areas were not assessed and, therefore, that the review is incomplete. As we have struggled to understand what these areas indicate, we have instead focussed on the areas marked Neutral/Detractive. Groups of properties identified as “Neutral/Detractive” that in our view demonstrate the ineffectiveness of the review at identifying character values include:
- 5.1. 89 Majoribanks Street, being a single-storey bungalow typical of the 1920s; 91 Majoribanks Street, being a two storey workers cottage; 97 Majoribanks Street, being a two-storey single-fronted Victorian town house; 103 Majoribanks Street being an asymmetrical double bay transitional villa; and 105 Majoribanks Street, being a blend of the Spanish Mission and Arts and Crafts styles, both being popular early 20th century.
 - 5.2. 145-151 Brougham Street, being three two-storeyed Victorian dwellings (now divided into flats); 3 and 5 Paterson Street which are double-bay villas (5 being more considerably modified than 3); and 7 Paterson Street which consists of three buildings of different ages, one of which was built for Waring Taylor in 1868.
 - 5.3. 38 Roxburgh Street (West) which is a two storeyed dwelling in late bungalow style (now a commercial premises); 40 and 42 Roxburgh Street (West) which are moderately modified two-storeyed Victorian-era dwellings; 46 Roxburgh Street, which is a two storey neo-classical style early 20th century residence;

² Mt Victoria Heritage Study Report 2017, WCC, p.16.

and 54 Roxburgh Street, which is a two-storey single-fronted Victorian townhouse modified in c.1920s.

6. We've included streetview images at pages 4-14 below.

Assessment of the character areas as heritage areas

7. In our evidence we expressed our view that the character areas are likely to meet the criteria for heritage areas and should have been assessed as such for the PDP.
8. We are content to address this in Hearing Stream 3 as proposed by Mr Lewandowski.

Statement of Supplementary Planning Evidence of Josh Patterson

9. We acknowledge Josh Patterson's agreement with our position on aligning MRZ-P8 with HRZ-P8 at paragraphs 51 and 52 of his statement of supplementary planning evidence, and the recommendation MRZ-P8 to include 'responding to the site context, particularly where it is located adjacent to a scheduled heritage building, heritage structure or heritage area, or Character Precinct'.
10. It remains our position that the Residential Design Guide should be amended to include G3.5 and the associated diagram from the (ODP) Central Area Urban Design Guide for the reasons stated in our submission and evidence.
 - 10.1. In our experience in working with district plans, diagrams such as the ones in the current Central Area Urban Design Guide are extremely useful for Council officials and other stakeholders to achieve good outcomes for buildings proposed adjacent to heritage places or within sensitive areas.
 - 10.2. Scientific research demonstrates that pictures can often convey an idea or concept more quickly, and be more easily understood and remembered, than descriptions given in words. Arguably, this is particularly the case where matters of form, design, and proportion are being considered.
 - 10.3. Our view is therefore that diagrams should be added to complement the written descriptions.



89 Majoribanks Street



91 and 93 Majoribanks Street



97 and 99 Majoribanks Street



103 Majoribanks Street



105 Majoribanks Street



145 and 147 Brougham Street (noting that there has been vegetation growth since this photograph was taken, but no visible changes to the fabric of the buildings themselves).



151 Brougham Street, with 147 and 145 Brougham Street on the left and 3 Paterson Street on the right (noting that there has been vegetation growth since this photograph was taken, but no visible changes to the fabric of the buildings themselves).



3 and 5 Paterson Street



7 Paterson Street



38-46 Roxburgh Street (West)



54 Roxburgh Street (west) on the right, with the side of 60 Roxburgh Street on the left. 60 Roxburgh Street is within the Primary/Contributing area indicated in the report, while 54 is in the Neutral/Detractive.