

**Before the Independent Hearings Panel
At Wellington City Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing submissions and further submissions on the
Proposed Wellington City District Plan

**Statement of supplementary planning evidence of Anna Stevens on behalf of
Wellington City Council**

Date: 3 May 2023

INTRODUCTION:

1 My full name is Anna Stevens. I am employed as Team Leader of the District Planning Team at Wellington City Council.

2 I have read the respective evidence of:

Kāinga Ora – Homes and Communities ID 391 and FS89

- a. Veronica Cassin for Kāinga Ora – Homes and Communities

David Walmsley ID 229

- a. Cameron de Leijer for David Walmsley

Heritage New Zealand Pouhere Taonga ID 70

- a. Dean Raymond On Behalf Of Heritage New Zealand Pouhere Taonga

Claire Bibby ID 329

- a. Barry O'Donnell for Claire Bibby

3 I have prepared this statement of evidence in response to expert evidence submitted by the people listed above to support the submissions and further submissions on the Proposed Wellington City District Plan (the Plan / PDP).

4 Specifically, this statement of evidence relates to the matters of [Hearing Stream 3 – Section 42A Report – Viewshafts](#).

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

5 My [section 42A report](#) sets out my qualifications and experience as an expert in planning.

- 6 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

SCOPE OF EVIDENCE

- 7 My statement of evidence:
- a. Addresses the expert evidence of those listed above; and
 - b. Identifies errors and omissions from my s42A report that I wish to address.

RESPONSES TO EXPERT EVIDENCE

Kāinga Ora ID 391 and FS89

(Veronica Cassin for Kāinga Ora – Homes and Communities)

- 8 With respect to Ms Cassin's commentary on viewshafts, I note that the only submission point [391.769] from Kāinga Ora on the Viewshaft Chapter and Schedule 5 - Viewshafts proposed a new Viewshaft be added to Schedule 5 to protect significant views of St Gerard's Monastery, Mount Victoria, and to protect identified townscape values in the Oriental Bay Height Precinct (MRZ-PREC03). It is noted that the request for a viewshaft in the relief sought was made in conjunction with a request by Kāinga Ora seeking to delete MRZ-PREC03. The submission point intent was to use a viewshaft to protect height limits in the absence of MRZ-PREC03.
- 9 In light of Kāinga Ora's submission point [391.769] being solely focused on the Oriental Bay Height Precinct (MRZ-PREC03), I am uncertain now as to why Ms Cassin's evidence now refers to viewshafts in relation to Mt Victoria North Townscape Precinct (MRZ-PREC02) and Historic Heritage. Kāinga Ora's submission point [391.769] on the Viewshaft Chapter did not address MRZ-PREC03, or Historic Heritage values.

- 10 As reinforced in Ms Popova's commentary provided in Appendix 1 of this statement of evidence, the purpose of the Viewshaft Overlay is to 'identify and maintain significant views within Wellington City that contribute to its sense of place and identity'. As the Viewshaft Chapter's introduction notes, viewshafts:
- Recognise the unique relationship between topography and built form;
 - Reinforce the historical connection between the original shoreline and the harbour;
 - Promote the visual connection between the City Centre and the inner harbour and, in doing so, contribute to wayfinding and an enhanced sense of place by providing continuous views to the inner harbour from the Golden Mile;
 - Establishing the relationship of the City Centre with its wider landscape and harbour setting; and
 - Reinforcing the City Centre's identity and sense of place.
- 11 In paragraph 7.4 of Ms Cassin's evidence she notes that 'provisions of the proposed Townscape Precinct and the relevant viewshaft would be insufficient to protect any latent historic heritage, such as described above, and therefore should not be relied upon as an interim measure.' As Ms Popova notes, and which I agree with, the purpose of Viewshafts is not to protect Historic Heritage. Instead the purpose is detailed in paragraph 10 above.
- 12 As I discuss in paragraphs 189-192 of the Viewshaft Section 42A report and as reinforced in Ms Popova's statement of evidence, Mount Victoria and St Gerard's monastery are already protected by Viewshafts 11, 12 and 15 in particular, but overall Oriental Bay, St Gerard's Monastery and Mt Victoria feature as focal and/or as context elements in 8 of the 18 PDP Viewshafts. My view that the key public views to these landmark elements in Wellington's townscape are already comprehensively captured by the Schedule 5 viewshafts remains the same.

- 13 I also note that Ms Cassin's evidence appears to have conflicting direction as she notes in paragraph 3.2 that 'additional viewshafts are not being considered in regard of historic heritage management' but then notes in paragraph 7.4 that the 'provisions of the proposed Townscape Precinct and the relevant viewshaft would be insufficient to protect any latent historic heritage, such as described above, and therefore should not be relied upon as an interim measure'.
- 14 I therefore consider that Ms Cassin's evidence that seeks protection of heritage values within the Mt Victoria Townscape Precinct, or protection of Historic Heritage through Viewshafts in general, is out of scope of Kāinga Ora's submission point [391.769] on viewshafts and Schedule 5.
- 15 Regardless, I have not changed my mind with respect to my position on Kāinga Ora's submission point [391.769].

David Walmsley ID 229

(Cameron de Leijer for David Walmsley)

- 16 I acknowledge Mr de Leijer's submitter evidence on behalf of David Walmsley. I want to respond to the following matters raised in Mr de Leijer's evidence:
- The application of the Operative District Plan's (ODP) viewshaft provisions with regard to residential areas;
 - The termination points of PDP viewshafts and the jurisdiction of WCC's authority; and
 - The 11m height limit within the Medium Density Residential Zone.
- 17 Firstly, with regards to Mr de Leijer's commentary in paragraphs 11-18 that refutes Ms Popova's evidence about the application of viewshaft provisions in the ODP, I seek to provide some clarity. To my knowledge Council has never assessed viewshafts outside the Central Area where

there is a specific viewshaft standard (13.6.3.3) and relevant rule (13.3.8).

18 As Mr de Leijer notes, this is because under the ODP there are only viewshaft provisions for the Central Area and not residential areas. Whilst the creation and planning regulations of viewshafts pre-date the ODP, I believe it is an oversight of the ODP that there are no specific viewshaft provisions in the Residential Area chapters. I believe that this has occurred for two reasons:

- The primary focus of viewshafts has been on managing development within the Central Area of the ODP to mitigate and reduce any intrusions into viewshafts in the foreground and immediate view that would thus block views from the viewshafts' viewing platforms to the focal elements. This focus was carried across to the PDP with the Viewshaft Chapter provisions applying to the City Centre Zone (CCZ) and Special Purpose Waterfront Zone (WFZ).
- As noted in paragraph 17 above, to my knowledge there has never been assessment of viewshafts outside the Central Area because provisions didn't exist, thus no changes have been made to ODP viewshaft provisions to be extended to residential areas.

19 Because there are no specific viewshaft provisions in the ODP Residential Area chapters, properties within residential areas that sit within a viewshaft (as context elements listed in Schedule 5 and/ or properties surrounding focal element) are able to develop without consideration under the rule framework for the viewshafts they are contained within. Without ODP residential area viewshaft provisions, properties only need to comply with the applicable land use provisions for the zone.

20 This identified lack of viewshaft provisions specific to Residential Zones also carried through to the PDP in the standalone Viewshaft chapter. In the Viewshaft PDP chapter references are only made to the CCZ and WFZ. This error in the PDP, in that the provisions only relate to the CCZ and WFZ and not other zones that the viewshafts traverse, was picked up through Council's submission points (266.90, 266.91, 266.92 and 266.93) on VIEW-R1 and VIEW-R2, which sought to add a zones column to VIEW-R1. The Council's submission point proposed that this could be captured through use of a 'Viewshaft Control Area' to address where the viewshafts traversed zones outside of the CCZ and WFZ.

21 After further consideration through drafting my Viewshaft S42A report I concluded that a better way to apply the viewshaft provisions to other zones beyond the CCZ and WFZ was to instead do the following:

- Add zone boxes to VIEW-R1 to reference the CCZ to make it explicit that VIEW-R1 Verandahs within viewshafts only applies to the CCZ;
- Update the rule heading for VIEW-R2 to explicitly connect the rule provisions to 'the extent of the Viewshaft Overlay', meaning that any property within the viewshaft overlay would be subject to the Viewshaft Chapter provisions under VIEW-R2; and
- Add zone boxes to VIEW-R2 Construction of new buildings and structures, and alterations and additions to existing buildings, within the extent of the Viewshaft Overlay. This makes it clear that the Viewshaft provisions apply to all zones through which the Viewshaft Overlay traverses, and applies to all viewshafts included in Schedule 5.

22 Under the ODP the applicant and resource consent planners have to check if properties sit within viewshafts by using the Central Area Appendix 11. This check is done for both properties in the Central Area or other zones, in order to understand if the property sits within a viewshaft, irrespective of provisions in the first case. This is because

regardless of the zone and what provisions exist, under Central Area Appendix 11 the maps show the full extent of viewshafts and which properties in residential areas fall within them. The difference is that there are viewshaft provisions in the Central Area and not in other zones.

- 23 As Ms Popova notes in paragraph 8 of her supplementary evidence, when Ms Popova refers to 1 Carlton Gore being included in the ODP Viewshaft Overlay in her statement of evidence, she is referring to the mapped viewshaft extent in ODP Central Area Viewshaft Appendix 11, which is a graphic representation of the viewshaft. As noted, the mapping in Appendix 11 shows the full extent of each viewshaft, alongside the descriptions in Appendix 11 of margins, locations, base detail etc. As referenced in Ms Popova's evidence and paragraph 154 of my Viewshaft S42A report, the ODP does not have viewshafts mapped in the ePlan, and thus Appendix 11 is required to show the full extent of viewshafts.
- 24 As Ms Popova's evidence and paragraph 154 of my Viewshaft S42A report details, the National Planning Standards have introduced the 'Overlay' tool and thus updated the PDP approach to mapping and showing various controls and mechanisms in the plan.
- 25 With respect to the termination points of PDP viewshafts, I agree with Mr de Leijer's sentiments that there appears to be no justification in my Section 42A report regarding the 'end' of Viewshaft PDP-VS14 . As Mr de Leijer quite rightly points out, the ODP and PDP viewshaft details in Schedule 5 for PDP-VS14 from the Cable Car includes both Point Jerningham and Point Halswell. Under the S42A report recommendations I had clipped the extent of PDP-VS14 back to the road edge at Oriental Parade because I had considered the risk of the focal element being built out to be low, and to enable MDRS development as of right within properties in Roseneath in PDP-VS14, as canvassed in paragraphs 151 – 166 of my report.

26 However, upon Mr de Leijer raising this in his evidence, I have now realised by doing so that PDP-VS14's mapped Viewshaft Overlay extent does not accurately capture all the focal elements within PDP-VS14, being both Point Jerningham and Point Halswell, and appears at odds with the Schedule 5 description of the focal element detail for PDP-VS14 which I did not intend to change.

27 When drafting the Viewshaft S42A report and forming my recommendations, I endeavoured to find a balance between preserving the integrity of the viewshafts included in Schedule 5 whilst also trying to enable development capacity and thus development within the areas surrounding the focal element. Hence, my recommendation to clip PDP-VS14 and other viewshafts back to the road edge where I felt the risk of intrusions into the viewshaft was low given the distance of these properties from the viewing platform and other controls to manage the bulk and form of development in these viewshafts. Examples of this being the Medium Density Residential Zone maximum height limit of 11m and the Oriental Bay Height Precinct (MRZ-PREC03).

28 Upon review of Mr de Leijer's evidence, I now consider that subsequent changes are needed to the extent of Viewshafts overlays in the PDP to show their full extent and to cover all their focal elements, whilst enabling development within residential areas up to maximum height limits. The intention of my recommended amendments is to provide a balance between protecting viewshafts, including the view of all focal elements, and enabling development anticipated within the zone for properties that sit in the wider focal and context areas.

29 As such, I propose the following changes:

- a. That the mapped extent of the following viewshafts need to be amended to include all their respective focal elements as detailed in Schedule 5, thus ensuring all viewshafts extend to

their focal elements (except for Viewshaft PDP-VS17¹), thus making the mapped extent their original ODP termination point. The following amendments are recommended:

- i. PDP-VS2 (Oriental Bay from Parliament Steps) – in replacement of my recommendation at **HS3-VIEW-Rec32.p.iii** the Viewshaft Overlay be extended to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct to cover the viewshafts' two focal elements being Oriental Bay, Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, with the termination point being moved to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, as seen in Figure 1 below:

¹ Note: I do not consider that an extension of Viewshaft PDP-VS17 is required as the risk of this viewshaft being built out is very low as the viewshaft runs down a road corridor and then dissects the harbour, thus restricting the likelihood of potential development impacting upon this viewshaft. I also note it traverses the Port which is exempt from the viewshaft rules.



Figure 1: Extent of recommended extension of the Viewshaft Overlay for PDP-VS2

- ii. PDP-VS5 (Waring Taylor Street) – in addition to my recommendation at **HS3-VIEW-Rec32.p.vi**, I also recommend the Viewshaft Overlay be extended to the Inner Town Belt/Te Ranga a Hiwi Precinct to cover the viewshaft’s two focal elements being Inner Harbour and Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, with the termination point being moved to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, as seen in Figure 2 below:



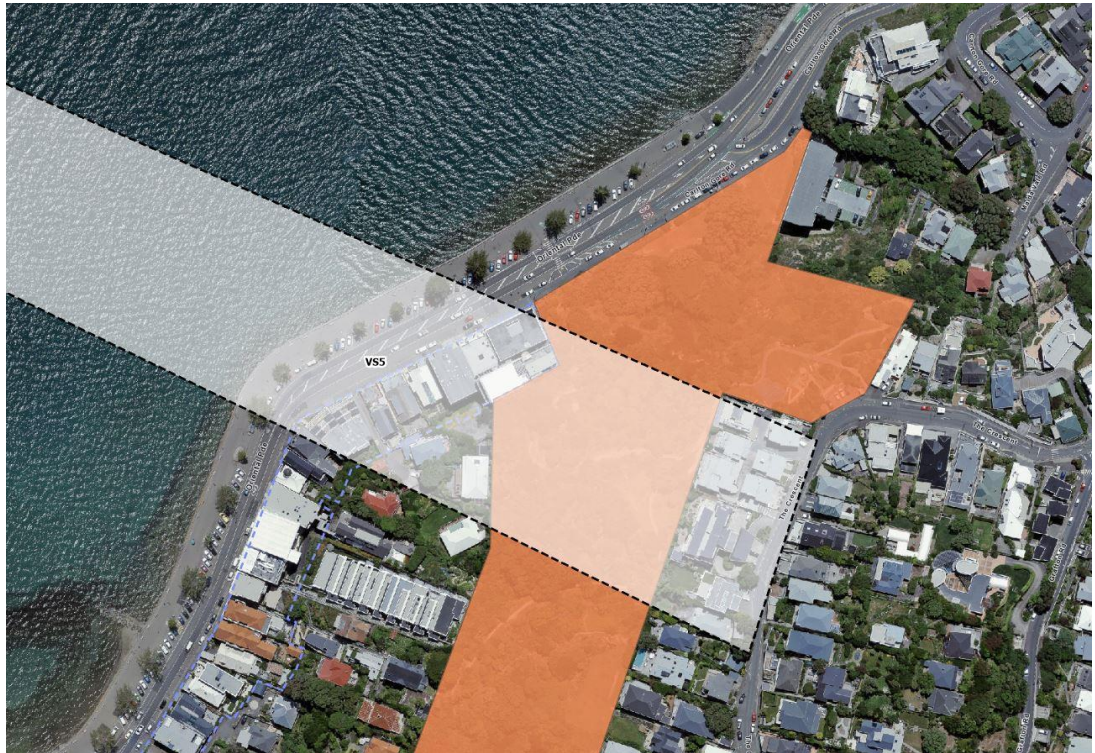


Figure 2: Extent of recommended extension of the Viewshaft Overlay for PDP-VS5

- iii. PDP-VS6 (Johnston Street) – in replacement of part of my recommendation at **HS3-VIEW-Rec32.p.vii**, I recommend the Viewshaft Overlay be extended to Roseneath and its built-up ridgeline, Inner Town Belt/Te Ranga a Hiwi Precinct to cover all of its focal elements, with the termination point moved to Inner Town Belt/Te Ranga a Hiwi, as seen in Figure 3 below:

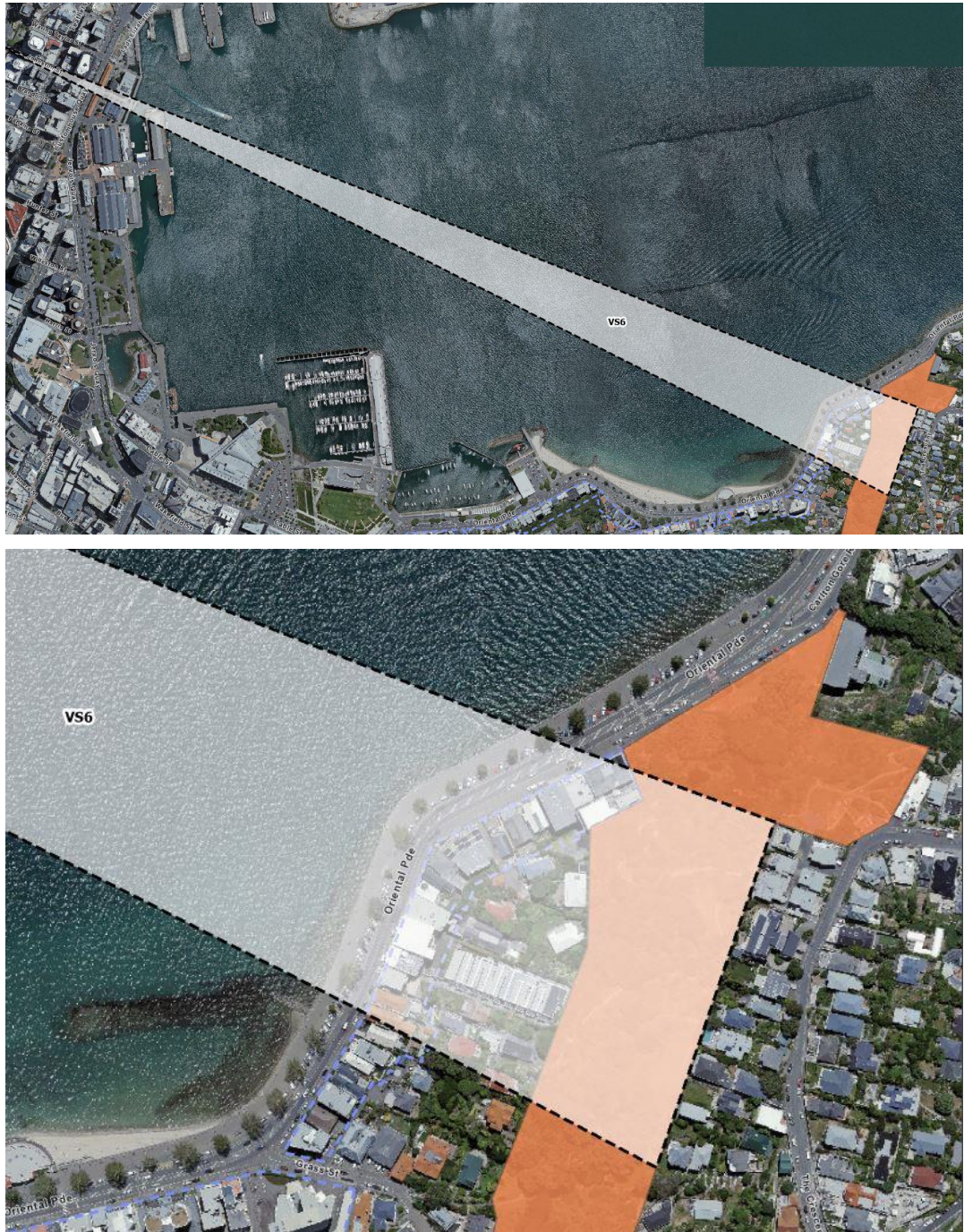


Figure 3: Extent of recommended extension of the Viewshaft Overlay for PDP-VS6

- iv. PDP-VS10 (Hunter Street) – in replacement of part of my recommendation at **HS3-VIEW-Rec32.p.x**, I recommend the Viewshaft Overlay be extended to Te Ranga a Hiwi Precinct to cover its focal elements of Oriental Bay and Te Ranga a Hiwi Precinct, with the termination point moved to Te Ranga a Hiwi Precinct, as seen in Figure 4 below:

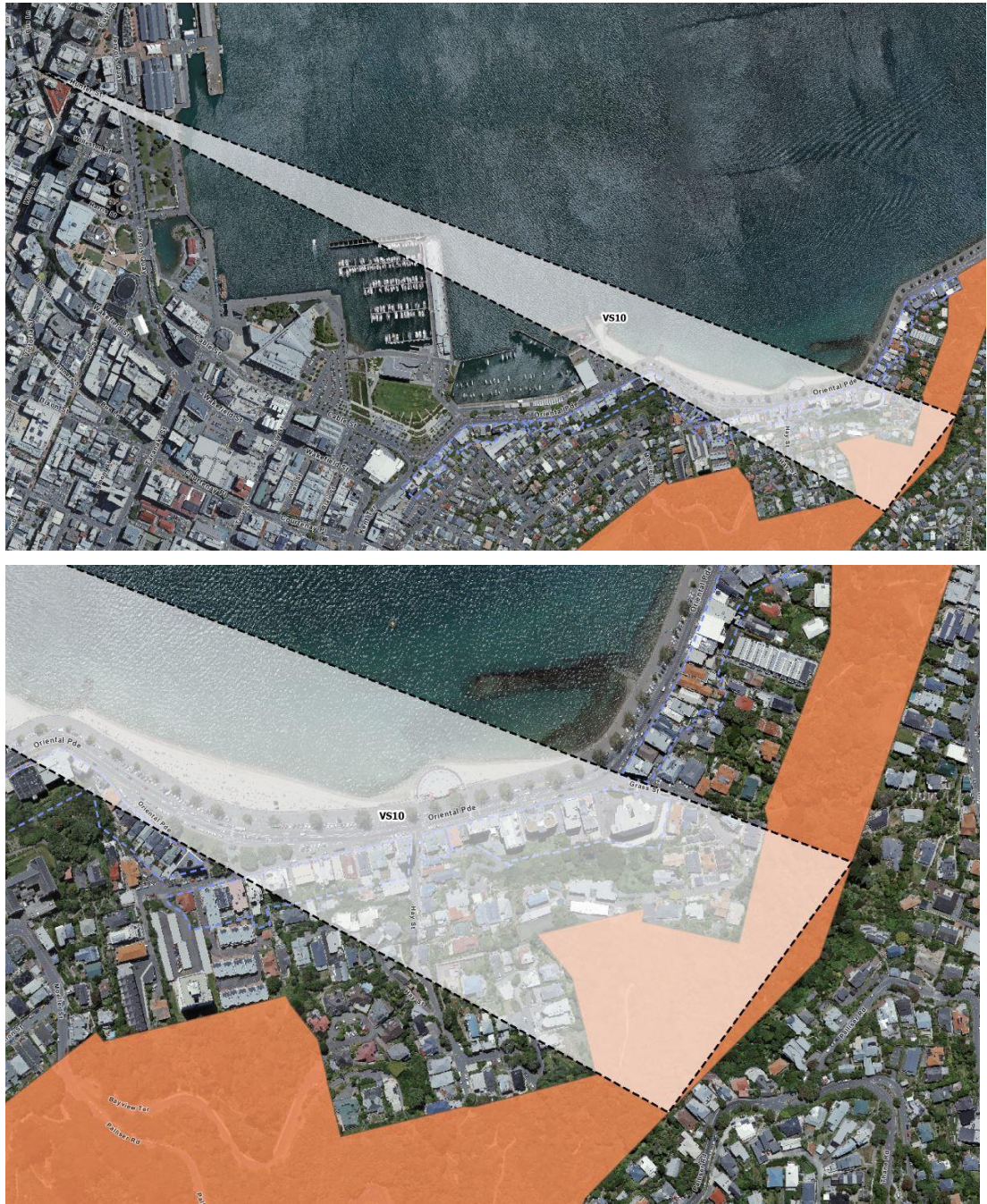


Figure 4: Extent of recommended extension of the Viewshaft Overlay for PDP-VS10

- v. PDP-VS14 (Cable Car Station to Point Jerningham and Point Halswell) – in replacement of part of my recommendations at **HS3-VIEW-Rec29** and **HS3-VIEW-Rec32.xiv**, I recommend the Viewshaft Overlay be extended to Point Halswell to cover the viewshaft’s two focal elements being Point Halswell and Point Jerningham, with the termination point moved to Point Jerningham, as seen in Figure 5 below:

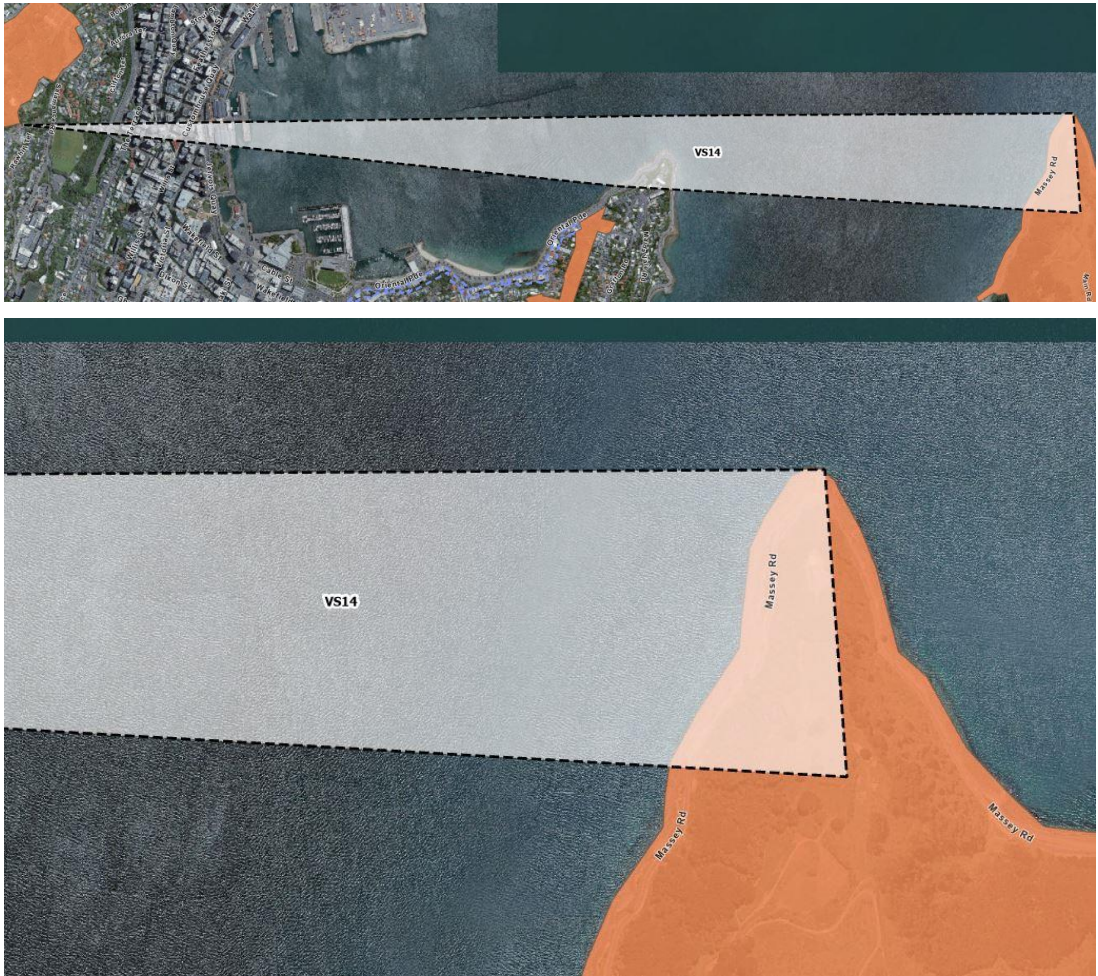


Figure 5: Extent of recommended extension of the Viewshaft Overlay for PDP-VS14

- vi. Figure 6 below provides a visual of these cumulative Viewshaft Overlay changes:

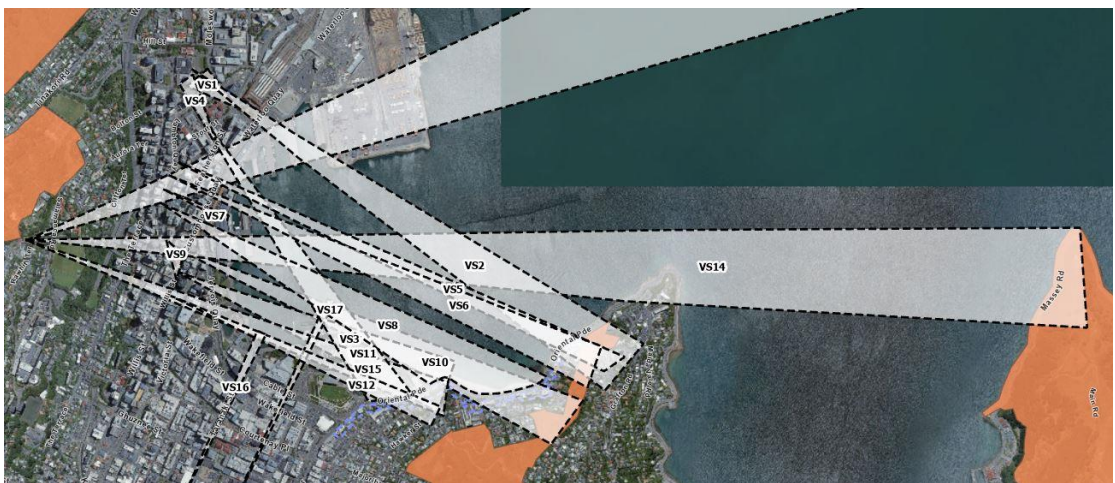


Figure 6: Cumulative Viewshaft Overlay changes I am recommending.

- b. VIEW-R2 be amended as follows, in replacement of my recommendation at **HS3-VIEW-Rec9**, to enable properties within the High Density Residential Zone (HRZ) and Medium Density Residential Zone (MRZ) to be able to build to their respective zones maximum building heights as a Permitted Activity within the Viewshaft Overlay, with resource consent required for development into the Viewshaft Overlay above the respective maximum buildings heights:

HS3-VIEW-Rec9:	
VIEW-R2	Construction of new buildings and structures, and alterations and additions to existing buildings, within the extent of the a-Viewshaft Overlay
<u>Medium Density Residential Zone</u>	<p><u>1. Activity Status: Permitted</u></p> <p><u>Where:</u></p> <p>a. <u>Compliance with any of the following standards is achieved:</u></p> <p>i. <u>MRZ-S1; and</u></p> <p>ii. <u>MRZ-S2.</u></p>
<u>High Density Residential Zone</u>	<p><u>2. Activity Status: Permitted</u></p> <p><u>Where:</u></p> <p>a. <u>Compliance with any of the following standards is achieved:</u></p> <p>i. <u>HRZ-S1.</u></p>
<u>All Other Zones</u>	<p><u>3. 4-Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p>a. Compliance cannot be achieved with <u>VIEW-S1.</u></p> <p>Matters of discretion are:</p> <p>1. The matters in <u>VIEW-P2.</u></p>
<u>Medium Density Residential Zone</u> <u>High Density Residential Zone</u>	<p><u>4. Activity Status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p>a. <u>Compliance with any of the requirements of VIEW-R2.1 and VIEW-R2.2 cannot be achieved; and</u></p> <p>b. <u>Development intrudes into any of the following non-identified iconic and landmark viewshafts identified in Schedule 5:</u></p> <p>i. <u>Viewshaft 3 (North Queens Wharf and Inner Town Belt – Whitmore Street);</u></p> <p>ii. <u>Viewshaft 5 (Waring Taylor Street);</u></p> <p>iii. <u>Viewshaft 6 (Johnston Street);</u></p> <p>iv. <u>Viewshaft 7 (Brandon Street);</u></p> <p>v. <u>Viewshaft 8 (Panama Street);</u></p>

		<ul style="list-style-type: none"> vi. Viewshaft 9 (Lambton Quay/Grey Street); vii. Viewshaft 10 (Hunter Street); viii. Viewshaft 11 (Willeston Street); ix. Viewshaft 12 (Chews Lane/Harris Street); x. Viewshaft 16 (Taranaki Street); and xi. Viewshaft 17 (Tory Street). <p><u>Matters of discretion are:</u></p> <ul style="list-style-type: none"> 1. The matters in VIEW-P1 and VIEW-P2.
<p>Medium Density Residential Zone</p> <p>High Density Residential Zone</p>		<p>5. <u>Activity status: Discretionary</u></p> <p><u>Where:</u></p> <ul style="list-style-type: none"> a. Compliance with any of the requirements of VIEW-R2.1 and VIEW-R2.2 cannot be achieved; and b. Development intrudes into any of the following iconic and landmark viewshafts identified in Schedule 5: <ul style="list-style-type: none"> i. Viewshaft 1 (The Beehive and Parliament Buildings); ii. Viewshaft 2 (The Inner Harbour/Mt Victoria Ridgeline from Parliament Steps); iii. Viewshaft 4 (Whitmore Street); iv. Viewshaft 13 (Viewing platform to the north of the Cable Car Station, focusing on Matiu Somes Island and Mokopuna Island); v. Viewshaft 14 (Viewing platform to the north of the Cable Car station focusing on Point Jerningham and Point Halswell); vi. Viewshaft 15 (Viewing platform to the north of the Cable Car station focusing on St Gerard's Monastery); and vii. Viewshaft 18 (The Panoramic view from the Cable Car).
<p>All Other Zones</p>		<p>6. 2-Activity status: Discretionary</p> <p><u>Where:</u></p> <ul style="list-style-type: none"> a. Development intrudes into any of the following iconic and landmark viewshafts identified in Schedule 5: <ul style="list-style-type: none"> i. Viewshaft 1 (The Beehive and Parliament Buildings); ii. Viewshaft 2 (The Inner Harbour/Mt Victoria Ridgeline from Parliament Steps); iii. Viewshaft 4 (Whitmore Street); iv. Viewshaft 13 (Viewing platform to the north of the Cable Car Station, focusing on Matiu Somes Island and Mokopuna Island); v. Viewshaft 14 (Viewing platform to the north of the Cable Car station focusing on Point Jerningham and Point Halswell); vi. Viewshaft 15 (Viewing platform to the north of the Cable Car station focusing on St Gerard's Monastery); and vii. Viewshaft 18 (The Panoramic view from the Cable Car).

- 30 Whilst the risk of the Viewshaft being built out by exceeding the height limit in either the MRZ or HRZ is low, I have realised that by not extending the Viewshaft Overlay to cover all focal elements and by instead terminating it at Carlton Gore Road I have potentially increased this risk through having no applicable viewshaft provisions at all. This would mean consent planners processing such applications would not be able to consider the impacts of proposed developments on these viewshafts. I have therefore changed my mind, and consider that there still needs to be protection in place for all the focal elements of the Viewshafts that I clipped back to Carlton Gore Road and Oriental Bay Parade (PDP-VS2, PDPVS5, PDP-VS6, PDP-VS10 and PDP-VS14). As previously stated, a balance is needed between protecting viewshafts whilst enabling the MDRS and development up to maximum zone building heights.
- 31 By extending these Viewshaft Overlay mapped extents to include all their respective focal elements, and terminating them at the furthestmost focal point, impacts on viewshafts will be a key consideration when an application for a tall building is received by Council. This will help to mitigate the likelihood of a tall building being developed that blocks part of viewshaft focal elements, and help achieve the PDP objectives with respect to viewshafts. For example, it would avoid a building the size of the Gateway Apartments in Roseneath being developed which could block part of the PDP-VS14 view of Point Halswell.
- 32 With respect to Mr de Leijer's conclusion that he supports the recommendation in the Viewshaft S42A report to remove the VS14 Viewshaft Overlay from the property at 1 Carlton Gore Road, I appreciate that he will not be content with the addition of the Viewshaft Overlay extending further over properties in Roseneath. However, I have sought to provide a balance between protecting viewshafts and the views of all focal elements within these viewshafts, and enabling development capacity. I consider this the most pragmatic approach to achieving potentially conflicting PDP objectives.

- 33 I consider the rule changes I have recommended in the table above achieve this balance, as Mr Walmsley can utilise the MDRS and develop up to the MRZ maximum building height of 11m, but any development beyond this height becomes a Discretionary activity needing to have regard to the potential impact on the respective viewshaft.
- 34 For consistency with the PDP Viewshaft Chapter rule VIEW-R2 and the categorisation of viewshafts into ‘iconic and landmark views’ versus non ‘iconic and landmark views’, I considered it was necessary to have a Restricted Discretionary activity status for intrusions above the MRZ and HRZ height limits into non-iconic views, and Discretionary activity status for intrusions into iconic views to fit with the current rule differentiation.
- 35 Whilst I have changed my position with regards to the extent of the viewshaft overlays, and my comfort with not having any provisions for the properties surrounding focal elements, I have not changed my mind regarding the impacts of developments in Roseneath (or other suburbs within focal areas) utilising the MRZ 11m maximum height limit with regards to viewshafts. I refer to my reasoning in paragraph 161 of Section 42A Report - Hearing Stream 3 – Viewshafts.
- 36 On the matter of the properties zoned within HRZ and MRZ in the area between the cable car lookout (starting location of PDP-VS13, 14 and 15) and the City Centre Zone within Kelburn, I am concerned that due to these properties being directly under the viewing platform that development above the maximum heights of the MRZ and HRZ may potentially compromise the base of the viewshafts. However, I consider that any development above the MRZ and HRZ maximum height limits of 11m and 14m respectively being a Discretionary Activity will enable the effects on viewshafts to be fully considered.
- 37 With the proposed changes to VIEW-R2 by referencing HRZ-S1 I am seeking to enable development of 1-3 residential units of 11m within viewshafts through the Permitted Activity rule addition. I note that the

S42A report for the HRZ recommended a greater permitted height of 14m for 1-3 residential units. I consider 11m and 14m permitted maximum building heights within the MRZ and HRZ areas of the viewshafts will still preserve the integrity of the viewshafts.

38 However, I disagree with enabling HRZ-S2 21m (6 storeys) as a permitted activity within VIEW-R2 as I am concerned that development of this height will comprise viewshafts. As such I have not referenced HRZ-S2 in the additional permitted activity HRZ viewshaft rule. Instead the intent is that development of this height would get caught under the Restricted Discretionary and Discretionary Activity rule additions I have made to VIEW-R2.

39 I have not recommended any changes to the mapping or termination points of the Viewshafts that cross the coastline or inner harbour in respect to Mr de Leijer's point in paragraph 23 of his evidence. This notes that Council needs to assess the end points of viewshafts to ensure that viewshafts do not cross the coastline, as he notes that Council does not have jurisdiction within this area.

40 Whilst I agree that the provisions of the PDP as they relate to the Viewshaft overlay would not apply to the extent that it covers the harbour as this is the jurisdiction of Greater Wellington Regional Council, it is still useful to have the overlays extend over the harbour for continuity.

41 The continuity of the overlay across the harbour gives viewers a more accurate visualisation of the path of the Viewshaft, rather than stopping the mapping at one interface with the harbour and beginning it again at the other side of the harbour. For example, stopping PDP-VS2 at the inner harbour near at Whitmore Street and beginning it again at Oriental Parade without the connecting extent across the harbour. Having a disconnected overlay may lead to confusion for District Plan viewers due to inconsistencies between the descriptions of

the Viewshaft and photos in Schedule 5 versus the broken viewshaft overlay mapping if it did not extend over the harbour.

- 42 The overlays purposefully include land adjacent to the road edge on Oriental Parade to protect this area from development that may block Oriental Bay as a focal element.

Heritage New Zealand Pouhere Taonga ID 70

(Dean Raymond Heritage New Zealand Pouhere Taonga)

- 43 I acknowledge Mr Raymond's statement of evidence (on behalf of Heritage New Zealand Pouhere Taonga), in particular his support for the Viewshaft S42A report recommendation to add an alternative viewshaft to the Operative District Plan's Viewshaft 21 (ODP-VS21) from the Operative District Plan. I note that Mr Raymond considers that the amended viewshaft will satisfy the matters raised in Heritage New Zealand Pouhere Taonga's submission point [70.74].
- 44 This recommended alternative viewshaft to ODP-VS21 would begin from the proposed viewing platform at the southern end of the Tomb of the Unknown Warrior and would concentrate on the view towards the Western Hills, with Mount Kaukau's peak as the focal element. As noted in paragraph 107 of the Section 42A report, the base of the viewshaft would be the upper limits of the Century City Hotel at the CCZ maximum building height of 42.5m, measured from the ground level at the Century City Hotel site. However, as noted in paragraph 111 of my Section 42A report, a survey assessment and further analysis would be needed to provide the specific base, margins and description detail needed to include the new viewshaft in SCHED 5 and the Viewshaft Overlay mapping.
- 45 Accordingly, I have not changed my mind with respect to the reinstatement of an alternative viewshaft to ODP-VS21.

- 46 However, one point that is not clarified in the Viewshaft S42A is whether this newly proposed viewshaft alternative to ODP-VS21 is considered to be a 'iconic and landmark view' or not. I consider that the proposed viewshaft does not fit the definition of 'iconic and landmark view' and is more akin to the city wide viewshafts that are listed in VIEW-S1. I note that unlike other viewshafts listed as 'iconic or landmark views' which focus on iconic buildings or landmarks like Parliament buildings, Saint Gerard's Monastery or Matiu Somes Island, the focal element of the alternative ODP-VS21 is the 'western hills'.
- 47 Another aspect not addressed is how this alternative viewshaft would be added into Schedule 5. I would anticipate this alternative viewshaft would be added to Schedule 5 before the notified PDP-VS18 as the notified PDP-VS18 is a panoramic viewshaft and the alternative ODP-VS21 viewshaft is akin to the other non-panoramic viewshafts. Thus notified panoramic viewshaft PDP-VS18 would become PDP-VS19 and the alternative ODP-VS21 would become PDP-VS18. The rule framework would need to be amended accordingly for the Viewshaft chapter.

Claire Bibby ID 329

(Barry O'Donnell for Claire Bibby)

- 48 With respect to Mr O'Donnell's evidence, I acknowledge that Claire Bibby's submission [329.1, 329.6] seeks to add a Viewshaft from the survey marker identified at 395 Middleton Road, Glenside, to the entrance of the Tawa No. 2 Tunnel. For the reasons extensively canvassed in paragraphs 179-188 of my Viewshaft S42A report, I have not changed my position, which is that I do not support Claire Bibby's proposed viewshaft addition to Schedule 5.

MINOR AND INCONSEQUENTIAL AMENDMENTS

49 Consideration of whether the proposed alternative ODP-VS21 is an 'iconic or landmark view' has identified some minor errors in drafting of the Viewshaft Chapter and Schedule 5 as follows:

- 'Iconic and Landmark' viewshafts are identified in PDP VIEWR2.2 and there is a definition of 'iconic and landmark' to help differentiate these types of viewshafts. However, there is no clear category name for viewshafts that are not identified as 'iconic and landmark' (which are listed in VIEW-S1).
- VIEW-O1 and VIEW-P2 relate to non 'iconic and landmark' viewshafts, whilst VIEW-O2 and VIEW-P3 relate to 'iconic and landmark' viewshafts. Without a category name for non 'iconic and landmark' viewshafts this differentiation across these objectives and policies is not as explicit as it could be.
- Related to this lack of clarity, Schedule 5 in the 'significance' row of every Viewshaft's listing lists viewshafts as either 'iconic and landmark' or 'Local'. It is not clear what 'local' means other than differentiating that these viewshafts are those listed in VIEW-S1 (the non 'iconic and landmark' viewshafts). I consider that this is a drafting term that was used as a placeholder and was not carried through into the Viewshaft Chapter and thus is an error. Better terminology is needed.
- I also note that there are errors in the significance classifications as follows:
 - PDP-VS2's significance says 'Local' but it is a 'Iconic and landmark' viewshaft under VIEW-R2.2.

- PDP-VS9’s significance says ‘Iconic and landmark’ but is listed under VIEW-S1 as not being an ‘iconic and landmark’ viewshaft.
- PDP-VS11 and PDP-VS12 are listed as non ‘iconic and landmark’ viewshafts in VIEW-S1 and SCHED 5 but one of their focal elements is St Gerard’s Monastery. PDP-VS15’s focal element is St Gerard’s Monastery and it is classified as an ‘Iconic and landmark’ viewshaft in VIEW-R2.2 and SCHED 5.

50 To rectify these errors and provide more clarity in the Viewshaft Chapter and Schedule 5 I consider the following changes are needed to the Viewshaft chapter:

- a. That the term ‘iconic and landmark’ and ‘local’ viewshafts are replaced in the Viewshaft Chapter and Schedule 5 with the terms ‘Category 1 Viewshafts’ and ‘Category 2 Viewshafts’. However, the definition of ‘Iconic and Landmark Views’ is to be retained and references to ‘Iconic and Landmark Views’ be retained as set out below.
- b. Amend the definition for ‘Iconic and Landmark Views’ as follows:

ICONIC AND LANDMARK VIEWS	Views that have been identified as having <u>enhanced</u> public significance, townscape value, or are representative of the City’s identity at a national or international scale.
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- c. That a definition of ‘Category 1 Viewshaft’ be added as follows:

<u>CATEGORY 1 VIEWSHAFT</u>	<u>Viewshafts with an enhanced public significance/ iconic and landmark views.</u>
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- d. That a definition of ‘Category 2 Viewshaft’ be added as follows:

CATEGORY 2 <u>VIEWSHAFT</u>	<u>Viewshafts with public significance.</u>
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- e. That in addition to my recommendation **HS3-VIEW-Rec32.d** amend the definition of 'Panoramic View' as follows:

PANORAMIC VIEW	An expansive wide-angled distant view providing a complete view of an area. Viewshafts associated with panoramic views are open (i.e. they are not defined by a base or margins).
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- f. That in addition to my recommendation **HS3-VIEW-Rec32.e** amend the definition of 'Viewshafts' as follows:

VIEWSHAFTS	<p>means a view down an identified viewing corridor (shaft) from a fixed point that is publicly accessible to identified focal elements and context elements. Viewshafts are defined by vertical margins and a base which demarcate the extent of the protected view. There are three types of views that viewshafts protect:</p> <p>a. Contained views run along street corridors and are vertically framed on either side by physical margins - a building or other structure (existing or future).</p> <p>b. Vista views are distant views obtained from elevated viewpoints or from areas that allow a wider viewing angle than contained views.</p> <p>c. Panoramic views <u>are expansive wide-angled distant views providing a complete view of an area.</u></p>
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- g. That in addition to my recommendation **HS3-VIEW-Rec4** additional information be added to the Viewshaft Introduction including:
- i. An addition to explain the level of public significance to connect the uses of ‘Category 1 Viewshafts’ and ‘Category 2 Viewshafts’. ‘Category 1 Viewshafts’ is replace the category name of ‘Iconic and Landmark’ viewshafts listed in VIEW-R2.2. ‘Category 2 Viewshafts’ is added as category name for non ‘iconic and landmark’ viewshafts listed in VIEW-S1. This recognises that all viewshafts have public significance but ‘Category 1 viewshafts’ have enhanced public significance.
 - ii. Deletion of the word ‘local’ and replacement of this with ‘city wide public’ with regards to significance.
 - iii. An addition to explain what ‘panoramic’ views are after the explanation of ‘contained’ and ‘vista’ views.

VIEW	VIEWSHAFTS
<p>Introduction</p> <p>The purpose of the Viewshafts Overlay is to identify and maintain significant views within Wellington City that contribute to its sense of place and identity. All the views covered by the overlay have local city wide public significance, providing a means of orientating oneself in the City and visual relief from the monotony of continuous built form. Many views are also recognised regionally, nationally or internationally. They are unique to Wellington and offer significant visual amenity to residents and visitors alike.</p> <p>There are 18 views identified that traverse the City Centre and Waterfront Zones. These views are experienced from a range of positions, some of which may be in a different zone to their intended focal point.</p> <p><u>While all the identified viewshafts are important and in need of protection their relative public significance could vary, depending on the significance of their viewpoint location, the extent or character of the view, and/or the meaning and significance of their focal element (i.e. local, city wide, national and/or international). On that basis two categories of viewshafts have been identified:</u></p> <ol style="list-style-type: none"> 1. <u>Category 1 viewshafts which have an enhanced public significance; and</u> 2. <u>Category 2 viewshafts which have public significance.</u> 	

There are three main types of view identified in the District Plan:

1. Views from the City Centre of the harbour, hills, [landmarks](#), and wider setting;
2. Wide-angle elevated views across the harbour from the Cable Car station viewing platform; and
3. Views of [landmark buildings](#) and places within the City Centre.

These views [hafts](#) are spatially characterised as either 'contained' views, [and](#) 'vista' views [or](#) '[panoramic](#)' views.

Contained views are typically those experienced along a street that is vertically framed by [buildings](#) (existing or future permitted) located along their edge, terminating at an identified focal point. They are important because they:

1. Recognise the unique relationship between topography and built form;
2. Reinforce the historical connection between the original shoreline and the harbour; and
3. Promote the visual connection between the City Centre and the inner harbour and, in doing so, contribute to wayfinding and an enhanced sense of place by providing continuous views to the inner harbour from the Golden Mile.

Vista views are more expansive than the contained views. They are typically viewed from elevated positions or from areas that allow a wider viewing angle, and complement the contained views experienced at street level. Their key features include:

1. Establishing the relationship of the City Centre with its wider landscape and harbour setting; and
2. Reinforcing the City Centre's identity and sense of place.

[Panoramic views are expansive wide-angled distant view providing a complete view of an area. Viewshafts associated with panoramic views are open.](#)

Some views (whether contained or vista views) have been identified due to their focus on important [landmark buildings](#) or iconic places within the City. These views are significant as they provide an understanding of the City Centre environment, promote its history and assist wayfinding.

The [Viewshafts](#) Overlay seeks to protect these identified views to ensure that they are not compromised by future development. Views, including [identified associated](#) focal and context elements, that are the subject of this overlay are identified in Schedule 5.

h. An amendment to VIEW-O1 as follows:

VIEW-O1	Purpose Views that have been identified as having city-wide public significance, townscape value, or are representative of the City's identity at a national or international scale are recognised and maintained.
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	Views that contribute to the City's identity and sense of place, and that support an understanding of the City's topography and urban form, are recognised and maintained.
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i. An amendment to VIEW-O2 as follows:

VIEW-O2	<p><u>Category 1 (Iconic and landmark views)</u></p> <p>Views from public places to key City <u>landmarks</u> are recognised and maintained due to their regional, national and/or international significance.</p>
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j. An amendment to VIEW-P3 as follows in addition to my recommendation **HS3-VIEW-Rec32.n**:

VIEW-P3	<p>Avoiding intrusions into <u>Category 1 (iconic and landmark views)</u></p> <p>Avoid intrusions into identified <u>Category 1 (iconic and landmark views)</u>, unless it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. The development will result in the removal of an existing intrusion or increase the quality of the view experienced; or 2. The intrusion is of a minor nature and will not detract from the overall appreciation of the view; or 3. In the case of verandahs, the intrusion will either be screened by another verandah or <u>building</u> element in the foreground or be contained within the outline of a <u>building</u> (that is not a context or focal element) in the background.
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k. An amendment to VIEW-R2.2 as follows in addition to my recommendation **HS3-VIEW-Rec9** and suggested amendments in paragraph 29 of this supplementary evidence:

HS3-VIEW-Rec9:	
VIEW-R2	Construction of new buildings and structures, and alterations and additions to existing buildings, within <u>the extent of the a-Vviewshaft Overlay</u>

All Other Zones

2.-Activity status: **Discretionary**

Where:

- b. Development intrudes into any of the following **Category 1 (iconic and landmark viewshafts)** identified in Schedule 5:
 - i. Viewshaft 1 (The Beehive and Parliament Buildings);
 - ii. Viewshaft 2 (The Inner Harbour/Mt Victoria Ridgeline from Parliament Steps);
 - iii. Viewshaft 4 (Whitmore Street);
 - iv. **Viewshaft 11 (Willeston Street);**
 - v. **Viewshaft 12 (Chews Lane/Harris Street);**
 - vi. Viewshaft 13 (Viewing platform to the north of the Cable Car Station, focusing on Maiti Somes Island and Mokopuna Island);
 - vii. Viewshaft 14 (Viewing platform to the north of the Cable Car station focusing on Point Jerningham and Point Halswell);
 - viii. Viewshaft 15 (Viewing platform to the north of the Cable Car station focusing on St Gerard's Monastery); and
 - ix. Viewshaft 18 (The Panoramic view from the Cable Car).

- I. An amendment to VIEW-S1 as follows in addition to my recommendation **HS3-VIEW-Rec32.o**:

VIEW-S1	Category 2 Viewshaft Protection
<p>1. No building or structure shall intrude on any of the following Category 2 viewshafts identified in <u>Schedule 5</u>:</p> <ul style="list-style-type: none"> a. Viewshaft 3 (North Queens Wharf and Inner Town Belt – Whitmore Street); b. View 5 (Waring Taylor Street); c. View 6 (Johnston Street); d. View 7 (Brandon Street); e. View 8 (Panama Street); f. View 9 (Lambton Quay/Grey Street); g. View 10 (Hunter Street); h. View 11 (Willeston Street); i. View 12 (Chews Lane/Harris Street); 	<p>Assessment criteria where the standard is infringed:</p> <ul style="list-style-type: none"> 1. Extent of intrusion; 2. Verandah dimension; 3. Scale; 4. Location; and 5. Design.

<p>j. View 16 (Taranaki Street); and</p> <p>k. View 17 (Tory Street).</p> <p>This standard does not apply to:</p> <p>a. Verandahs that comply with CCZ-S8 and do not intrude into VS1 or VS4;</p> <p>b. Any building or structure within the coastal marine area;</p> <p>c. Land within the 'Commercial Port' area of the Port Zone; and</p> <p>d. Cranes, elevators and similar cargo or passenger handling equipment and lighting poles.</p> <p>Note: Vegetation intruding into a viewshaft will be disregarded when assessing applications, particularly where pruning or the deciduous nature of the vegetation can act to restore the quality of the view.</p>	
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m. An amendment to SCHED 5 PDP-VS3, PDP-VS5 – PDP-VS8, PDP-VS10 and PDP-VS16 and PDP-VS17 to change their 'significance' row description from 'Local' to 'Category 2' in addition to my recommendations in **HS3-VIEW-Rec32.p.vi**, **HS3-VIEW-Rec25**, **HS3-VIEW-Rec32.p.viii** and **HS3-VIEW-Rec32.p.x** as follows:

VS3 North Queens Wharf and Inner Town Belt – Whitmore Street	
Description	<p>A view of the North Kumutoto Precinct and the Inner Town Belt down Whitmore Street at the intersection of Bowen Street and Lambton Quay.</p> <p>VS3 is one of eight viewshafts offering views from the Golden Mile (Lambton Quay/Willis Street) to the harbour and its wider setting. The importance of these viewshafts, individually and collectively, is that they provide frequent and sequential views to the harbour for those moving along the Golden Mile - one of the most widely used pedestrian routes within the city. Collectively these viewshafts enhance the historical connection between the original shoreline and the harbour. They also promote visual and physical connections between the CBD and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.</p>
Type of view	Contained
Significance	Local Category 2

VS5 Waring Taylor Street	
Description	VS5 is one of eight viewshafts offering views from the Golden Mile (Lambton Quay/Willis Street) to the harbour and its wider setting and

	<p>is sequential to VS3 as you move south along Lambton Quay. It is also located in the vicinity of one of Wellington's most widely used inner-city parks (Midland Park).</p> <p>The importance of these viewshafts, individually and collectively, is that they provide frequent and sequential views to the harbour for those moving along the Golden Mile - one of the most widely used pedestrian routes within the city – and enhance the historical connection between the original shoreline and the harbour. They also promote the visual and physical connection between the city centre and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.</p>
Type of view	Contained
Significance	Local Category 2

VS8 Panama Street	
Description	<p>VS8 is one of eight viewshafts offering views to the harbour and its wider setting. It is sequential to VS7 as you move south along the Golden Mile with the view along Panama Street obtained from an elevated viewpoint on The Terrace. Its elevated position and alignment along a thoroughfare between Lambton Quay and The Terrace offers a publicly accessible view of the harbour to be enjoyed from a different angle/perspective.</p> <p>Collectively these viewshafts are important as they enhance the historical connection between the original shoreline and the harbour. They also promote the visual and physical connection between the city centre and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.</p>
Type of view	Contained
Significance	Local Category 2

VS10 Hunter Street	
Description	<p>VS10 is one of eight viewshafts offering views from the Golden Mile (Lambton Quay/Willis Street) to the harbour and its wider setting and is sequential to VS7 as you move south along Lambton Quay. The importance of these viewshafts, individually and collectively, is that they provide frequent and sequential views to the harbour for those moving along the Golden Mile - one of the most widely used pedestrian routes within the city – and enhance the historical connection between the original shoreline and the harbour. They also promote the visual and physical connection between the city centre and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.</p>
Type of view	Contained
Significance	Local Category 2

VS16 Taranaki Street	
Description	<p>VS16 plays an important role in establishing the visual relationship between this important arterial pedestrian and vehicle connection to the port, and inner harbour and the more distant hills of the City.</p>
Type of view	Contained
Significance	Local Category 2

VS17 Tory Street	
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Description	VS17 aligns with an important pedestrian route and plays an important role in establishing a visual relationship between the Te Aro Basin and the waterfront/inner harbour and the more distant western hills of the City.
Type of view	Contained
Significance	Local Category 2

- n. An amendment to SCHED 5 PDP-VS1, PDP-VS2, PDP-VS4, PDP-VS11, PDPVS12, PDPVS13 – PDP-VS15 and – PDP-VS18, to change their ‘significance’ row description from ‘Iconic and Landmark’ to ‘Category 1’ in addition to my recommendations in **HS3-VIEW-Rec42.p.ii, HS3-VIEW-Rec32.P.iii, HS3-VIEW-Rec32.P.iii, HS3-VIEW-Rec32.P.v, HS3-VIEW-Rec32.P.xi, HS3-VIEW-Rec32.P.xiii, HS3-VIEW-Rec32.P.xiv, HS3-VIEW-Rec32.P.xv and HS3-VIEW-Rec32.P.xvi** as follows:

VS1 The Beehive	
Description	<p>A view of the Beehive from a major thoroughfare for commuters. This is one of two significant viewshafts (the other being VS4) which, when combined, promote the image of Wellington as a capital city in views from key points within the northern end of the City Centre Zone</p> <p>The Beehive and Parliament Buildings are two of the emblems of New Zealand’s capital and key landmarks in the Wellington townscape. VS1, located on a major pedestrian route for commuters leaving the Wellington Rail Station, enhances wayfinding and contributes to Wellington’s sense of place.</p>
Type of view	Contained
Significance	Iconic and Landmark Category 1

VS2 Oriental Bay from Parliament Steps	
Description	<p>A view of Oriental Bay from the top of the steps to the old Parliament Building. This is a very important location as it is one where tourists often have their photograph taken, and where petitions are received, and demonstrations are held. The viewpoint provides an elevated view across the harbour to Oriental Bay and Roseneath and promotes the relationship between two of Wellington’s key townscape features – Parliament Buildings and Grounds and the harbour.</p> <p>VS2 is one of 15 viewshafts that enhance the visual connection between the city, the harbour and their wider setting.</p>
Type of view	Vista
Significance	Local Category 1

VS4 The Beehive and The Cenotaph – Whitmore Street

Description	VS4 is one of two viewshafts (the other being VS1) focused on the Beehive from the south and east as set against the backdrop of Te Ahumairangi Hill. Along with the Beehive this viewshaft includes the Cenotaph as an additional focal element. Both of these viewshafts are individually and collectively significant and promote the image of Wellington as NZ's 'seat of government' and capital city in views from key points. Additionally, as the Beehive and Cenotaph are important physical reminders of Wellington's rich history the views to and from them, as provided by VS4, contribute to the city's sense of place.
Type of view	Contained
Significance	Iconic and Landmark Category 1

VS11 Willeston Street	
Description	VS11 is one of eight viewshafts offering views from the Golden Mile (Lambton Quay/Willis Street) to the harbour and its wider setting and is sequential to VS10 as you move south along the Golden Mile. The importance of these viewshafts, individually and collectively, is that they provide frequent and sequential views to the harbour for people moving along the Golden Mile - one of the most widely used pedestrian routes within the city – and enhance the historical connection between the original shoreline and the harbour. They also promote the visual and physical connection between the city centre and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.
Type of view	Contained
Significance	Local Category 1

VS12 Chews Lane/Harris Street	
Description	VS12 continues the series of eight viewshafts offering views from the Golden Mile (Lambton Quay/Willis Street) to the harbour and its wider setting and is sequential to VS11. The importance of these viewshafts, individually and collectively, is that they provide frequent and sequential views to the harbour for those moving along Lambton Quay and Willis Street - both of which are widely used pedestrian routes within the city - and enhance the historical connections between the original shoreline and the harbour. They also promote physical and visual connections between the city centre and the waterfront which, in turn, contributes to wayfinding and an enhanced sense of place.
Type of view	Contained
Significance	Local Category 1

VS13 Cable Car Station to Matiu Somes Island and Mokopuna Island	
Description	VS13, along with VS14 and VS15, is one of three elevated viewshafts offering 'vista' views across the harbour from the west. Originating from the same viewpoint (the Cable Car Station viewing platform), these viewshafts provide sequential views of the city's compact urban form and wider harbour landscape setting moving in a north to south direction and

	<p>complement the 'ground level' viewshafts along the Golden Mile offering views to the harbour.</p> <p>By allowing wide angle expansive views of Wellington's memorable landscape these viewshafts enable the city's natural and urban context and sense of place to be experienced and enjoyed, and collectively combine to provide a single 'panoramic' view of the city (refer Viewshaft 18).</p>
Type of view	Vista
Significance	Iconic and Landmark Category 1

VS14 Cable Car Station to Point Jerningham and Point Halswell	
Description	<p>VS14, along with VS13 and VS15, is one of three elevated viewshafts offering views across the harbour from the west. Originating from the same viewpoint (the Cable Car Station viewing platform), these viewshafts provide sequential views of the city's compact urban form and wider harbour and landscape setting moving in a north to south direction and complement the 'ground level' viewshafts along the Golden Mile offering views to the harbour.</p> <p>By allowing wide angle expansive views of the Wellington's memorable landscape, these viewshafts enable the city's natural and urban context and sense of sense of place to be experienced and enjoyed, and collectively combine to provide a single 'panoramic' view of the city (refer Viewshaft 18).</p>
Type of view	Vista
Significance	Iconic and Landmark Category 1

VS15 Cable Car Station to St Gerard's Monastery	
Description	<p>VS15, along with VS13 and VS14, is one of three elevated viewshafts offering views across the harbour from the west. Originating from the same viewpoint (the Cable Car Station viewing platform), these viewshafts provide sequential views of the city's compact urban form and wider harbour and landscape setting moving in a north to south direction, and complement the 'ground level' viewshafts along the Golden Mile offering views to the harbour.</p> <p>By allowing wide angle expansive views of the Wellington's memorable landscape, these viewshafts enable the city's natural and urban context and sense of sense of place to be experienced and enjoyed, and collectively combine to provide a single 'panoramic' view of the city (refer Viewshaft 18).</p>
Type of view	Vista
Significance	Iconic and Landmark Category 1

VS18 Cable Car Panoramic View	
Description	VS18 recognises the expansive views offered from the Cable Car station across Wellington Harbour, including contributory short- and long-range

	natural and built elements. It is a popular viewpoint because of its accessibility from the City Centre via the Cable Car and its panoramic views.
Type of view	Panoramic
Significance	Iconic and Landmark <u>Category 1</u>

- o. An amendment to SCHED 5 PDP-VS9 as follows in addition to my recommendations in **HS3-VIEW-Rec32.P.ix**:

VS9 Lambton Quay/Grey Street	
Description	Although located on Lambton Quay, VS9 is not one of the eight viewshafts offering views from the Golden Mile to the harbour and its wider setting. Instead, it offers a 'townscape' view that principally focusses on two widely recognisable city centre buildings (the MLC Building and Aon Centre - the latter formerly known as the BNZ Tower and then State Insurance Building). Although the two buildings present distinctly different form and architectural character/features, they are both well-known city landmarks. Consequently, the viewshaft acknowledges and promotes the townscape significance of these buildings and the contribution they make to the sense of place in this locality.
Type of view	Contained
Significance	Iconic and Landmark <u>Category 2</u>

Date:

3 May 2023

Anna Stevens

Team Leader, District Planning

Wellington City Council

Appendix 1: Section 32AA further evaluation report

HS3-VIEW-Rec32.p.iii: That PDP-V2 be amended as follows:

- Move the termination point to the Eastern side of Glasgow wharf (see Figure 25).

PDP-VS2 (Oriental Bay from Parliament Steps) – in replacement of my recommendation at HS3-VIEW-Rec32.p.iii, I recommend the Viewshaft Overlay be extended to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct to cover the viewshafts’s two focal elements being Oriental Bay, Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, with the termination point being moved to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, as seen in Figure 1 below:



Figure 1: Extent of recommended extension of the Viewshaft Overlay for PDP-VS2

HS3-VIEW-Rec32.p.vi: That PDP-VS5 be amended as detailed below:

PDP-VS5 (Waring Taylor Street) – in addition to my recommendation at HS3-VIEW-Rec32.p.vi, I recomendthe Viewshaft Overlay be extended to the Inner Town Belt/Te Ranga a Hiwi Precinct to cover the viewshaft’s two focal elements being Inner Harbour and Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, with the termination point being moved to Mount Victoria ridgeline/Te Ranga a Hiwi Precinct, as seen in Figure 2 below:



Figure 2: Extent of recommended extension of the Viewshaft Overlay for PDP-VS5

- Retain the same frame for PDP-VS5 as set out in SCHED5 but include a corrected, updated photo of this viewshaft to reflect the current context, noting that the current photo in PDP-VS5 currently shows temporary construction buildings and material impeding the majority of the viewshaft. This is misrepresentative of the viewshaft, and the viewshaft is now a lot less cluttered than the view currently shown in PDP-VS5 SCHED5. Figure 27 shows PDP-VS5 in its current state(note this is indicative only and a professional picture is required).



Figure 27: Showing PDP-VS5 in its current state.

HS3-VIEW-Rec32.p.vii: That PDP-VS6 Viewshaft Overlay mapping be amended as detailed below:

- Move the termination point so that it extends to the northern road edge of Oriental Parade (see Figure 28).

PDP-VS6 (Johnston Street) – in replacement of part of my recommendation at HS3-VIEW-Rec32.p.vii, I recommend the Viewshaft Overlay be extended to Roseneath and its built-up ridgeline, Inner Town Belt/Te Ranga a Hiwi Precinct to cover all of its focal elements, with the termination point moved to Inner Town Belt/Te Ranga a Hiwi Precinct, as seen in Figure 3 below:



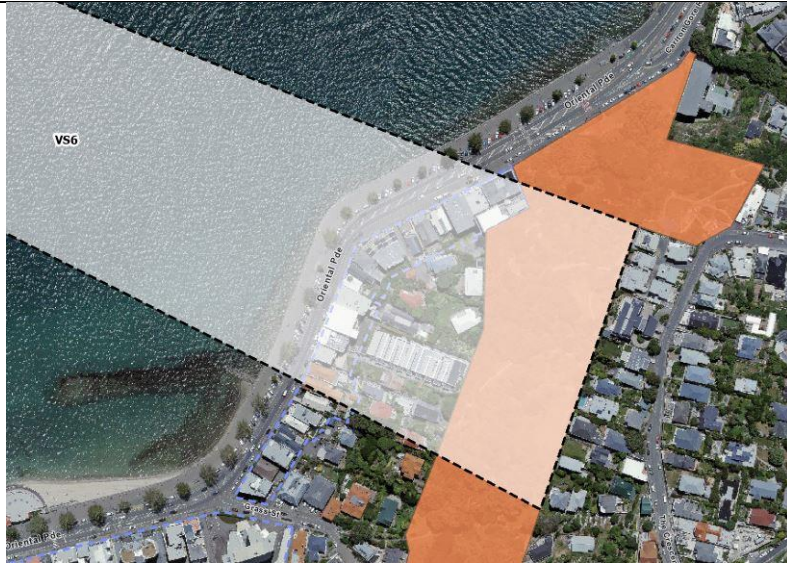


Figure 3: Extent of recommended extension of the Viewshaft Overlay for PDP-VS6

HS3-VIEW-Rec32.p.x: That PDP-VS10 Viewshaft Overlay mapping be amended as detailed below:

- Correct the location point of PDP-VS10 and consequentially widen the left margin to align with the Harbour Tower and narrow the right margin to align with Ricoh House (see Figure 29).
- Move the termination point so that it extends to the northern road edge of Oriental Parade (see Figure 29).

PDP-VS10 (Hunter Street) – in replacement of part of my recommendation at HS3-VIEW-Rec32.p.x, I recommend the Viewshaft Overlay be extended to Te Ranga a Hiwi Precinct to cover its focal elements of Oriental Bay and Te Ranga a Hiwi Precinct, with the termination point moved to Te Ranga a Hiwi Precinct, as seen in Figure 4 below:





Figure 4: Extent of recommended extension of the Viewshaft Overlay for PDP-VS10

HS3-VIEW-Rec29 and HS3-VIEW-Rec32.xiv: I recommend that the PDP-VS14 Viewshaft Overlay mapping be amended as detailed below:

- Correct PDP-VS14 to widen the left margin to intersect with the Point Jerningham lighthouse (as per the description in SCHED5) (see Figure 33).
- Correct the mapped extent of PDP-VS14, namely the right margin to align with SCHED 5 – Viewshafts (see Figure 33).
- Amend the mapped extent of PDP-VS14 to draw it back to the north road edge of Oriental Parade and across to Point Jerningham Lighthouse (see Figure 33).

PDP-VS14 (Cable Car Station to Point Jerningham and Point Halswell) – in replacement of part of my recommendations at HS3-VIEW-Rec29 and HS3-VIEW-Rec32.xiv, I recommend the Viewshaft Overlay be extended to Point Halswell to cover the viewshaft’s two focal elements being Point Halswell and Point Jerningham, with the termination point moved to Point Jerningham, as seen in Figure 5 below:

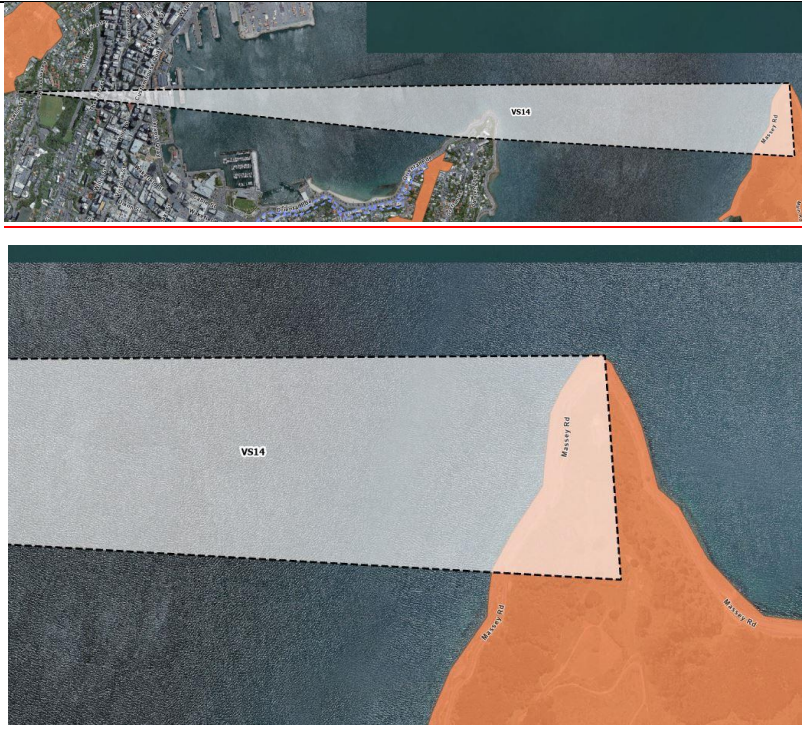


Figure 5: Extent of recommended extension of the Viewshaft Overlay for PDP-VS14

HS3-VIEW-Rec9: That VIEW-R2 be amended as detailed below:

VIEW-R2	Construction of new buildings and structures, and alterations and additions to existing buildings, within the extent of the a-Viewshaft Overlay
<p><u>Medium Density Residential Zone</u></p>	<p>1. Activity Status: Permitted</p> <p><u>Where:</u></p> <p>a. <u>Compliance with any of the following standards is achieved:</u></p> <p>iii. <u>MRZ-S1; and</u></p> <p>iv. <u>MRZ-S2.</u></p>
<p><u>High Density Residential Zone</u></p>	<p>2. Activity Status: Permitted</p> <p><u>Where:</u></p> <p>a. <u>Compliance with any of the following standards is achieved:</u></p> <p>ii. <u>HRZ-S1.</u></p>
<p><u>All Other Zones</u></p>	<p>3. 4-Activity status: Restricted Discretionary</p> <p><u>Where:</u></p> <p>a. Compliance cannot be achieved with <u>VIEW-S1.</u></p> <p>Matters of discretion are:</p> <p>1. The matters in <u>VIEW-P2.</u></p>

<p><u>Medium Density Residential Zone</u></p> <p><u>High Density Residential Zone</u></p>	<p><u>4. Activity Status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <ul style="list-style-type: none"> a. <u>Compliance with any of the requirements of VIEW-R2.1 and VIEW-R2.2 cannot be achieved; and</u> b. <u>Development intrudes into any of the following non-identified iconic and landmark viewshafts identified in Schedule 5:</u> <ul style="list-style-type: none"> xii. <u>Viewshaft 3 (North Queens Wharf and Inner Town Belt – Whitmore Street);</u> xiii. <u>Viewshaft 5 (Waring Taylor Street);</u> xiv. <u>Viewshaft 6 (Johnston Street);</u> xv. <u>Viewshaft 7 (Brandon Street);</u> xvi. <u>Viewshaft 8 (Panama Street);</u> xvii. <u>Viewshaft 9 (Lambton Quay/Grey Street);</u> xviii. <u>Viewshaft 10 (Hunter Street);</u> xix. <u>Viewshaft 11 (Willeston Street);</u> xx. <u>Viewshaft 12 (Chews Lane/Harris Street);</u> xxi. <u>Viewshaft 16 (Taranaki Street); and</u> xxii. <u>Viewshaft 17 (Tory Street).</u> <p><u>Matters of discretion are:</u></p> <ul style="list-style-type: none"> 2. <u>The matters in VIEW-P1 and VIEW-P2.</u>
<p><u>Medium Density Residential Zone</u></p> <p><u>High Density Residential Zone</u></p>	<p><u>5. Activity status: Discretionary</u></p> <p><u>Where:</u></p> <ul style="list-style-type: none"> c. <u>Compliance with any of the requirements of VIEW-R2.1 and VIEW-R2.2 cannot be achieved; and</u> d. <u>Development intrudes into any of the following iconic and landmark viewshafts identified in Schedule 5:</u> <ul style="list-style-type: none"> viii. <u>Viewshaft 1 (The Beehive and Parliament Buildings);</u> ix. <u>Viewshaft 2 (The Inner Harbour/Mt Victoria Ridgeline from Parliament Steps);</u> x. <u>Viewshaft 4 (Whitmore Street);</u> xi. <u>Viewshaft 13 (Viewing platform to the north of the Cable Car Station, focusing on Matiu Somes Island and Mokopuna Island);</u> xii. <u>Viewshaft 14 (Viewing platform to the north of the Cable Car station focusing on Point Jerningham and Point Halswell);</u> xiii. <u>Viewshaft 15 (Viewing platform to the north of the Cable Car station focusing on St Gerard's Monastery); and</u> xiv. <u>Viewshaft 18 (The Panoramic view from the Cable Car).</u>

	<p><u>All Other Zones</u></p>	<p>6. 2-Activity status: Discretionary</p> <p>Where:</p> <p>a. Development intrudes into any of the following <u>iconic and landmark viewshafts</u> identified in <u>Schedule 5</u>:</p> <ul style="list-style-type: none"> i. Viewshaft 1 (The Beehive and Parliament Buildings); ii. Viewshaft 2 (The Inner Harbour/Mt Victoria Ridgeline from Parliament Steps); iii. Viewshaft 4 (Whitmore Street); iv. Viewshaft 13 (Viewing platform to the north of the Cable Car Station, focusing on Matiu Somes Island and Mokopuna Island); v. Viewshaft 14 (Viewing platform to the north of the Cable Car station focusing on Point Jerningham and Point Halswell); vi. Viewshaft 15 (Viewing platform to the north of the Cable Car station focusing on St Gerard's Monastery); and vii. Viewshaft 18 (The Panoramic view from the Cable Car).
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51 In my opinion, the recommended amendments to the Viewshaft Overlay mapping and VIEW-R2 are more appropriate in achieving the objectives of the Viewshaft chapter than the notified provisions.

52 I consider that these changes will:

- a) Increase alignment with the NPS-UD 2020;
- b) Increase alignment with the Part 2 Strategic Directions of the Plan;
- c) Increase alignment with the intent of the ODP and PDP Viewshaft objectives and policies; and
- d) Increase clarity of the Viewshaft chapter rule framework compared to the notified PDP Viewshaft chapter rule framework, with greater clarity as to what zones the Viewshaft Overlay applies to and the applicable activity statuses.

53 Consequently, the amendments are more efficient and effective than the notified provisions in achieving the objectives of the plan.

- 54 The recommended amendments will not have any greater environmental, social, cultural or economic effects than the notified provisions. The extension of the Viewshaft Overlay back over properties in the MRZ and HRZ such as 1 Carlton Gore Road will result in a viewshaft overlay control being placed on these properties. However, the impact of this in terms of the ability to develop to MDRS and the maximum height limits of these zones has been eliminated through the proposed changes to VIEW-R2 in this supplementary evidence.
- 55 In particular, the creation of permitted activity carve-outs within VIEW-R2 to enable development within viewshafts to comply with MRZ-S1, MRZ-S2 and HRZ-S1. Because property owners are able to develop these sites to their respective zone maximum building heights, I consider the lost development potential from placing these sites within the Viewshaft Overlay is minor. A resource consent under the MRZ or HRZ rule framework would still be required for any exceedances to maximum height limits in these zones if these properties were not subject to the viewshaft overlay.
- 56 This change in rule VIEW-R2 now requires a resource consent with regards to building height exceedances beyond the heights detailed in MRZ-S1, MRZ-S2 and HRZ-S1 into the respective viewshafts. As such it is adding another consent consideration when resource consent is already required for any height exceedances beyond the maximum building heights.
- 57 I also note that Property Economics in their Qualifying Matters Capacity Assessment (2022)² found that viewshafts have 'little to no impact on capacity'. As such I consider the impact of recommended changes to the Viewshaft Overlay extent and VIEW-R2 upon development capacity for these sites is negligible. Through the recommended changes I have endeavoured to find a balance between preserving the integrity of the viewshafts included in Schedule 5 whilst also trying to enable development capacity and thus development within the areas surrounding the focal element.

² Property Economics, Wellington City Qualifying Matters Capacity Assessment, November 2022 [Wellington City Qualifying Matters Capacity Assessment November 2022](#)