

Submission Form on Our City Tomorrow: Draft Spatial Plan for Wellington City , submission #15851

Page 1: Personal information

Name (first and last)

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Email submission

I would like to receive a copy of my submission by email

Postal address

PO Box 90 851 Auckland Mail Centre AUCKLAND 1142 NEW ZEALAND

Suburb

Other

Phone number

No Answer

Preferred method of contact option

Email

Newsletter Signup

No Answer

I am making this submission

on behalf of an organisation

Organisation name

ICOMOS New Zealand

Age range

45 - 54

Household

Other

Area

Other

Other suburb

Auckland central

Page 2**To what extent do you agree or disagree with what is proposed with intensification in the Central City.**

Strongly Disagree

To what extent do you agree or disagree with what is proposed with intensification in the Inner Suburbs.

Strongly Disagree

To what extent do you agree or disagree with what is proposed with intensification in the Outer Suburbs.

Agree

We have taken a city-wide view with how we have proposed intensification across the central city, inner suburbs and outer suburbs. Overall to what extent do you agree or disagree with our approach to this distribution?

Disagree

If you disagree, where would you distribute the additional 80,000 people across the city over the next 30 years?

We would not remove protection from demolition for sites of primary or contributory significance within the Character Areas. Instead, we would identify underdeveloped sites in the central city and inner suburbs for development, and focus on allowing sympathetic redevelopment of sites of neutral/detractive significance (as identified in the Pre-1930 Character Area Review 2019), and sites of no character or heritage value. We would enable and incentivise works to improve heating and insulation for pre 1930s character and heritage buildings. We would undertake wider heritage and character studies to identify any more potential heritage and character areas that should be protected – eg Kelburn, Hataitai and Kilbirnie.

To what extent do you agree or disagree with how we have balanced protecting special character and providing new housing in the inner suburbs.

Strongly Disagree

We want to make sure we keep what is special about the character of the inner suburbs as we provide new houses in these areas. What about the character in these suburbs is important to you?

These areas have cultural heritage value (defined in the ICOMOS NZ Charter, 2010 'Cultural heritage value/s means possessing aesthetic, archaeological, architectural, commemorative, functional, historical, landscape, monumental, scientific, social, spiritual, symbolic, technological, traditional, or other tangible or intangible values, associated with human activity'). The areas containing pre 1930s housing contribute to a unique identity for Wellington in the context of New Zealand. These areas contribute to community wellbeing – social, cultural, economic and sustainability. The story of development of these areas over time is special – this can be read in the different ages, styles and forms of the houses. This is also evident in the patterns of alterations to some of the building types. For example many villas had their windows altered in the 1920s and 30s. This story of development continues to the present day, and a new wave of sympathetic development of sites which have been identified as neutral or detractive in the Pre-1930

Character Area Review (23 January 2019) could add another layer. A high proportion of older buildings and a mix of old and new is important to these areas. Character and heritage areas do not have to be completely intact and homogenous. Older buildings in terms of their form and architectural rhythm and their small lot sites create a visual interest and human scale for communities. If demolition controls are removed from large areas of character then there is likelihood that developments will amalgamate sites and this will result in the loss of the historical grain of these inner city suburbs. We have seen this occur in Christchurch with the extent of demolition post earthquakes, combined with the planning regulations which encouraged amalgamation of sites.

What amenities would you want to help create a vibrant suburban centre? (please pick your top 5 from the options below)

Proximity to parks and open space, Access to public transport, Public/shared spaces, Commercial activity (retail, cafes, local businesses), Employment opportunities, Community spaces or 'hubs' that provide for a variety of functions (working, study, etc.), Infrastructure (stormwater, water supply, wastewater), Social services and community facilities, Medical facilities/centres, Access to cycleways/routes, Walkability within the centre, Easy walking distance to the centre

Other (please specify)

Access to heritage and cultural sites, experiences and stories. Public artworks. Visible layers of history through physical reminders in the landscape, and storytelling (interpretation, artworks). Opportunities to interact with heritage and culture in a meaningful way.

What amenities would you want to see around future mass rapid transit stops? (please pick your top 5 from the options below)

Public shared spaces, Landscaped spaces/plantings, Parks and playgrounds, Shops and businesses, Cafes and restaurants, Community facilities (libraries, community spaces, social services, etc.), Bicycle parking

Other (please specify)

Access to heritage and cultural sites, experiences and stories. Public artworks. Visible layers of history through physical reminders in the landscape, and storytelling (interpretation, artworks). Opportunities to interact with heritage and culture in a meaningful way.

To what extent do you agree or disagree with the following statement:

No Answer

Our City Tomorrow outlines a 'blueprint' for how we can grow and develop that aligns with the five goals for Wellington to be Compact, Resilient, Inclusive and Connected, Vibrant and Prosperous, and Greener.

Disagree

COVID-19 has had a significant impact on our lives and on our city. We acknowledge that since March this year people may have experienced their local suburb or neighborhood in a different way.

No Answer

What spaces, amenities, or facilities did you find most beneficial during the different levels in your local neighbourhood/suburb?

Experiencing local character and heritage buildings – the visual qualities, the variety of form, materials and detailing, distinctive styles. Appreciating the unique identity of neighbourhoods. Experiencing a connection to place and belonging through the older buildings and the visual mix of old and new. Connecting with natural heritage.

What amenities or facilities were missing or could have been improved?

There could be improved interpretation of heritage, historic and character places to enable improved interaction and understanding within our communities.

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What do you like about Our City Tomorrow: A Draft Spatial Plan for Wellington City?

We agree that making changes to planning controls to incentivise development is an appropriate way to encourage more housing construction; but this needs to be carefully and appropriately managed in Heritage and Character Areas in order to ensure that what makes our city special is not destroyed in the name of providing more housing that may be of poor quality in the long term. We support the spatial plan's vision for a greener, more diverse, connected city; and believe that maintaining the Pre-1930s Character Areas, and identifying further areas for protection, will be a key method of achieving this. We support allowing development on under-developed sites in the central city and inner suburbs (for example on vacant sites, car parks and car parking buildings) provided that heritage and character values are not negatively impacted, and are preferably enhanced. We also support the identification of smaller developable areas within Character Areas, provided its impact on the Character Areas as a whole is appropriately assessed.

What would you change or improve?

There should be greater recognition of the contribution that the conservation of heritage and character areas makes Wellington a liveable and vibrant city that is attractive and inherently sustainable. Demolition controls for all Character Areas should remain in place. Instead of looking to remove these controls, development should be targeted at underdeveloped, non-character and non-heritage sites and areas within the CBD, inner suburbs and outer suburbs. This not only requires an understanding of the current heritage and character areas, but a careful assessment of all inner, and key outer, suburbs. Further discussion on the above points is provided in the next section.

Is there anything that needs to be considered as we plan for the future that is not provided for in Our City Tomorrow?

The Resource Management Act (RMA) is the principal document under which the Spatial Plan must sit. The definition of historic heritage in the RMA encompasses a diversity of significant places – historic buildings and structures, archaeological sites, historic sites, coastal sites, historic areas and Māori heritage. The RMA clearly states (in section 6f) that protecting historic heritage from inappropriate subdivision, use and development is a matter of national importance. Character is identified as an 'other matter' that decision-makers have to have regard to in section 7. Accordingly, the National Policy Statement on Urban Development 2020 (NPS_UD) with which the Draft Spatial Plan is designed to conform, enables local authorities to modify intensification requirements for historic heritage, which is recognised as a qualifying

matter. In addition, the NPS-UD also acknowledges that there may be 'other matters' that would make high density development inappropriate; and guidance on implementing the NPS-UD identifies 'special character' as an example of what might constitute an 'other matter'. Notwithstanding the above, the current District Plan and the Draft Spatial Plan make an arbitrary distinction between 'heritage' and 'character'. Wellington's character areas have been identified for their pre-1930s character; and the Pre-1930s Character Area Study 2019 clearly articulates the physical attributes of these areas as being of historic architectural styles and materials. They also represent stages of particular development at a particular time in our past. These Character Areas, therefore, have historic heritage value as a 'physical resource that contributes to an understanding and appreciation of New Zealand's history and cultures'. Heritage and character studies should be undertaken across all of the "outer" suburbs to identify more potential heritage and character areas that should be protected. In particular, Kelburn, which is more of an "inner" suburb than Berhampore, being much closer and better connected to the CBD, should be studied. Hataitai and Kilbirnie also warrant further investigation and improved protections for heritage and character. The existing pre-1930 character demolition controls should not be targeted to sub-areas within the inner suburbs that are substantially intact and consistent. These sub areas have been taken too far. The threshold for character areas has been set too high. The result would be very small pockets of character/heritage remaining. The Character Area Review provides a site by site analysis - this should be the basis for the spatial plan, to allow for large areas of character to be retained as cohesive wholes, with sympathetic infill only on the sites identified as neutral or detractive. This approach would retain more of the sense of character and identity for Wellington and its residents, and the wellbeing benefits those areas provide. Development on the sites identified as neutral or detractive should be designed in such a way as to ensure that they do not negatively impact on, or dominate, the heritage and character values of these areas. Provisions which do not protect contributory buildings from demolition and only provide controls over the design of new builds do not provide protection of the heritage values and community identity which older buildings contribute. In Christchurch we have seen inner city suburbs of distinct character (eg Beveridge, Conference, Peacock Streets) transformed with new development. This area contained small timber workers cottages with gabled roof forms. Now there are a handful of cottages remaining, with all new townhouses, many with gabled roof forms, and the heritage values and character of the original area is gone. Design responses to the older buildings are meaningless now that most of these no longer remain to serve as a reference. Demolition controls should only be removed from neutral/detractive sites within Character Areas, and design and height controls should be introduced to ensure that new buildings enhance rather than detract from the areas character and heritage values. We believe that the Draft Spatial Plan fails to adequately consider the contribution heritage and character buildings make to sustainability and resilience. Heritage places and values contribute to the resilience of communities by providing a sense of place and identity. Historic buildings represent a large amount of embodied energy, and are generally built of high quality materials such as native timbers that can no longer be sourced. Furthermore, their demolition will add to New Zealand's already very high levels of construction waste. It is therefore vastly more sustainable to retrofit existing heritage, historic and character buildings than to demolish and rebuild in new materials. We agree in principle with considered development of the outer areas of the city, including Churton Park and Tawa. We believe that more concentrated development in these areas removes the reasons for justifying densification in the character areas.

To what extent do you agree or disagree with the following statements considering what is proposed for the Inner Suburbs.

No Answer

The refined approach to the pre-1930 character areas offers a good balance between protecting special character and providing new housing in these areas.

Strongly Disagree

The existing pre-1930 character demolition controls should be targeted to sub-areas within the inner suburbs that are substantially intact and consistent.

Strongly Disagree

The pre-1930 character demolition controls should be removed in areas that are no longer substantially intact and consistent or where character has been compromised.

Strongly Disagree

There should be a continued emphasis on streetscape character in those areas outside of the proposed sub-areas through the retention of a general character area to ensure that new development respects local streetscape and is well-designed.

Strongly Agree

The refined approach to the pre-1930 character areas retains controls on demolition in the right locations and where streetscape character is substantially intact.

Strongly Disagree

There is a good mix of housing types and heights that is suitable for the area given the city's projected population growth and the need for more housing choice.

Disagree

Thinking about Upper Stebbings Valley, to what extent do you agree or disagree with the following statements?

No Answer

Developing the area between Churton Park and Tawa to create a new neighbourhood supports our goals of making Wellington a compact, resilient, vibrant and prosperous, inclusive and connected, and greener city.

Agree

Connecting a future community in Upper Stebbings and Glenside with Takapu train station and the shops and services in Tawa will support public transport usage and access to economic opportunities.

Agree

Thinking about the Lincolnshire Farm Structure Plan, to what extent do you agree or disagree with the following statements:

No Answer

The Lincolnshire Farm Structure Plan should be reviewed to allow for a mix of housing types and to accommodate more dense housing options (such as townhouses and low rise apartments can be built in this area).

Agree

We also want to understand the public appetite for community planning processes in specific areas, such as:

No Answer

Te Motu Kairangi/Miramar Peninsula. This framework could cover matters such as how to maximise the benefits of living, working and visiting the area, investment in social and affordable housing aligned with public transport and greenspace, and how to ensure better connections to the City particularly with the future mass rapid transit route.

No Answer

Strathmore Park. This could be to develop a plan for regenerating this suburb, which could include developing new modern or upgraded state housing with better public transport connections to the rest of the City, along with a range of other initiatives that could benefit the wider area including the neighborhood center.

No Answer

Do you support the idea of a community planning process for the following areas:

No Answer

Te Motu Kairangi/Miramar Peninsula

Yes

Strathmore Park

Yes

If you answered yes, to the two questions above please respond to the following questions:

No Answer

What should Te Motu Kairangi/Miramar Peninsula Framework focus on or cover?

This requires further conversation with mana whenua.

What should the plan for regenerating Strathmore Park focus on or cover?

This requires further consultation with the community and conversation with mana whenua.

Overall do you agree with our proposed approach to protecting our natural environment and investment in our parks and open spaces?

Agree

Do you think Council should offer assistance to landowners to help them protect their Backyard Tāonga (the natural environment) on their private property?

Yes

If you answered yes to the question above, what types of assistance would help landowners?

Financial assistance

Other (please specify)

we agree with the proposed approach to protecting natural environment and investing in parks and open spaces. This can easily be coordinated with appropriate conservation and carefully managed development in heritage and character areas, which are essential to the quality of our environment in Wellington City. the Council should also offer assistance to landowners to help them protect their heritage, historic or character properties, and we believe this is equally if not more essential. Financial assistance would be better utilised for supporting property owners to seismically strengthen, restore, conserve and maintain heritage, historic and character buildings and places, and/or buildings within heritage and character areas.

Are there any final comments you wish to include in your submission? If so, please provide your comments below.

The information presented in the Pre-1930 Character Area Review 2019 and the treatment of character areas and sub areas proposed in the Spatial Plan do not align. The Draft Spatial Plan provides no rationale for the reduction or removal of character protection in the areas. For example, The Terrace consists of 83 primary and contributory sites, and 27 neutral and detractive sites. The character contribution and building age overlay shows large runs of buildings of primary and contributory significance, with some neutral and detractive buildings in between. Approximately half of the buildings are of the Victorian Italianate style. This does not evidence that there is no cohesive streetscape character or that the character has been compromised - quite the reverse. The proposed Character Areas with no demolition controls, together with the proposed sub-areas with result in isolated small pockets of heritage and character buildings remaining. These will not be sufficient to retain the special and irreplaceable identity that the character housing areas of Wellington contribute to community wellbeing, and identity for communities and for the City in the New Zealand context. Our built heritage and character are invaluable and, once lost, cannot be replaced. As a city that is fortunate to have large urban areas of heritage and historic character intact, we should be looking to improve and enforce protection of these areas, not reduce it. It is critical that Wellington does not become an example of the backwards trend in heritage protection that we have seen nationally in recent times. Instead, Wellington should be a leading example of the ways in which heritage and character can be appropriately protected and conserved. This would recognise the recent Government move towards improving heritage protections, evidenced by the Ministry for Culture and Heritage's Strengthening Heritage Protection project. Thank you for the opportunity to make a submission. About our organisation: ICOMOS is an international non-governmental organisation of heritage professionals dedicated to the conservation of the world's historic monuments and sites. The organisation was founded in 1965 as a result of the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice in the previous year. ICOMOS is UNESCO's principal advisor in matters concerning the conservation and protection of historic monuments and sites. The New Zealand National Committee was established in 1989 and incorporated in 1990. ICOMOS New Zealand has over 140 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners. In 1993, ICOMOS New Zealand published the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. A revised ICOMOS New Zealand Charter was published in September 2010 and is available on the ICOMOS New Zealand website. The heritage conservation principles outlined in the ICOMOS New Zealand Charter are based on a fundamental respect for significant heritage fabric and the intangible values of heritage places. Contact: secretariat@icomos.org.nz

Attach document

No file uploaded

Have you provided an attached document?

No
