



May 14, 2018

Wellington City Council
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Submission on the 10-Year Term Plan 2018

This submission is made on behalf of an organisation, **Mt Victoria Historical Society Inc.**

It is an incorporated society with the aims of researching and sharing the history of the suburb of Mt Victoria and promoting interest in, and preservation of, its unique heritage.

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This submission addresses only issues in the 10-Year Term Plan which can be considered the mandate of Mt Victoria Historical Society.

We would like to speak to our submission.

Priority area: Resilience and environment

It is good that a priority area is “Resilience and the environment”. In principle we support Option 1 but are concerned that it does not include anything relating to climate change. This is despite the fact that the introduction to the plan (Our challenges as a city, pg 7) talks about the fact that the “climate is also changing”. The plan is focused on dealing with this change as a fact, rather than acknowledging some responsibility for it and initiating strategies to mitigate it.

Built Heritage Incentive Fund

We are concerned to see that only \$450,000 per annum has been allocated to the BHIF and \$1 million to support repair of unreinforced masonry to improve the city’s resilience. This is not enough to encourage preservation of the unique built heritage that contributes to Wellington’s sense of place, historic areas of human scale and character.

Addition of land to the Wellington Town Belt

We strongly support the addition of land to the Town Belt where possible. The Council must also protect what it already has under its management, however. This includes not allowing more land to be taken for such things as roading in Hataitai.

It also includes managing the Basin Reserve as legally required under legislation and developing a Reserves Management Plan for it. (See Appendix for the Council's own description of the importance of Reserve Management Plans.) This is long overdue and was particularly remarked on during the Board of Inquiry into the proposed Basin Bridge Flyover.

Priority area: Housing

We note that WCC has the goal of identifying existing Council housing sites for redevelopment and intensification. In principle, it is appropriate to take this approach to development of the city.

There are a number of Council housing sites in Mt Victoria, however, and there should not be further intensification there. That could only happen by building more multi-storey housing and this is not appropriate in an area of such unique and high heritage values.

Under *Inner-city building conversions* the statement is made that WCC's "approach to growth has always focused on intensification of existing urban areas". We strongly oppose further intensification of any kind in Mt Victoria. It is already extremely densely populated, roads are narrow and there is very limited parking. Further intensification will destroy its amenity, heritage, tourism and cultural (film locations, Town Belt border etc.) values. Council officers should not be allowed to use discretionary powers to increase heights beyond what is allowed in the District Plan Rules.

We also believe it is important to restrict the building heights along Kent and Cambridge Terraces. Again, Council should not be allowed to grant the right to build higher than permitted under the District Plan. This is a very important boulevard, the significance of which was acknowledged in the Basin Bridge Board of Inquiry. Buildings higher than the Plan limit will have the effect of visually and spatially walling off the suburb of Mt Victoria from the rest of the city. Kent and Cambridge Terrace are also canal reserve land and it would be inappropriate to wall that in, particularly when there has been talk in the past (hopefully to be revived one day) of daylighting the stream which runs through it. Any higher will also destroy the heritage and architectural value of buildings such as Suzanne Aubert's crèche, Sir James Elliot's house, the Cambridge Terrace church, the Cambridge Hotel and the Embassy Theatre.

Rental Warrant of Fitness

We support development of a standard to lift the quality of housing. Currently, a considerable amount of the housing stock in Mt Victoria is allowed, by irresponsible landlords, to deteriorate to a state where it is considered beyond repair. Meanwhile, with pressure on accommodation, people are expected to live in it.

Priority area: Transport

We are concerned that the majority of spending in this sector (\$122 million) is to be allocated to the Lets Get Wellington Moving (LGWM) programme, and there are no details on this yet.

There is evidence that the Council is still supporting bridges/fly-overs at the Basin Reserve, a second Mt Victoria tunnel, and roading through Hataitai that will damage both that community and the Town Belt. This is strongly opposed for several reasons:

- It is contrary to the priority of ‘Resilience and environment’, as it encourages additional motor vehicle transport and emissions and potentially hands over more of the Town Belt for roading
- It further cuts the community of Hataitai off from the rest of the city
- Roading infrastructure and a second Mt Victoria tunnel threaten the heritage and residential amenity of the southern end of Mt Victoria, the amenity, open space, reserve status and heritage values of the Basin Reserve, and access to schools. All this has been conclusively proven unjustifiable at both Board of Enquiry and High Court level
- A solution with a high roading infrastructure component would not meet the criteria for “enhances liveability of the central city” [page 51 of the 10 Year Plan document] or, more importantly, principles 3, 7, 9 and 12 of the LGWM strategy. See also the comment about climate change above.

Priority area: Sustainable growth

Comprehensive District Plan Review

We can appreciate that it may be time for a comprehensive review of the District Plan but in the meantime Council:

- must not allow developers/building owners to constantly breach its rules
- must list the Basin Reserve in the District Plan as soon as possible. It is shameful that this nationally listed historic area is not recognised in the city’s own District Plan.

Extracts from WCC Reserves Management Plans

Showing how they are considered essential to management and decision-making about the reserves they cover.

From: Introduction, Northern Reserves Management Plan 2008

The purpose of the Northern Reserves Management Plan (NRMP) is to provide Wellington City Council with a clear framework for day to day management and decision making for the Council-owned reserves and open spaces in the northern area (northern reserves) for the next 10 years. Objectives and policies give guidance for the development, management, protection, operation and public use of the northern reserves.

A primary objective of the NRMP is to ensure that the local and wider connections, recreational and ecological, are well integrated as development proceeds. The extent, location, form, and connectedness of open space at the local as well as the wider landscape scale are key determinants of visual amenity values as well as the wider landscapes character and quality.

From: Introduction, Town Belt Management Plan 2013

The purpose of the Wellington Town Belt Management Plan is to provide Wellington City Council with a clear framework for making decisions and managing the Town Belt for at least the next 10 years.

The plan provides a framework for addressing issues common to the Town Belt and managing them in a comprehensive and consistent way. Objectives and policies give guidance for the development, management, protection, operation and public use of the Town Belt.

From: Introduction, Draft Suburban Reserves Management Plan 2014

Within any community, open space holds important landscape, recreational, social, ecological, amenity and cultural or heritage values. As Wellington grows and changes, it is important to ensure open space across the city is well planned for and managed. Preparation of a management plan for suburban reserves¹ enables the values of these reserves to be managed in a way that reflects their particular role in the open space network. Suburban reserves have a unique set of functions and values that, while part of the citywide open space network, have an important neighbourhood role.

The purpose of the Suburban Reserves Management Plan (SRMP) is to provide Wellington City Council with a clear framework for day-to-day management and decision-making for Council-administered reserves and open spaces