

Submission Guide: Wellington City Council Draft District Plan

This guide has been prepared by The Mt Vic Planning Group (an informal group of Mt Vic residents, including representation from Mt Victoria Historical Society) to assist people in making a submission to the Council on the Draft Spatial Plan.

The most important thing is to put in a submission. Numbers count! It doesn't have to be lengthy or involve in-depth research. (There is another opportunity to make submissions next year when the District Plan goes before Hearing Commissioners.)

(Here's a link to the Draft District Plan - <https://planningforgrowth.wellington.govt.nz/district-plan-review>)

Deadline for submissions is 5pm on Tuesday, December 14

This guide is in two parts:

Part 1 – some pointers on what you might consider including in your submission,

Part 2 – the process.

Part 1 – Content suggestions

The following are some of the issues we think are most important to provide feedback to the Council on.

We encourage you to select those that accord with your views, put them in your own words, and also to add a personal perspective. And, of course, if you have other matters you wish to submit on please do that, too.

- **Reinstate the pre-1930s demolition rule to, at a minimum, the areas recommended by WCC in the Draft Spatial Plan plus the areas recommended by Heritage NZ¹.**

Almost the entirety of Mt Victoria is a heritage area and the pre-1930s demolition rule (or something similar) should continue to be applied across the whole suburb. 85% properties pre-date 1930, 90% of these categorised as primary and contributory (38% and 52% respectively). It has a number of houses built in 1869 – some of the earliest extant dwellings in the city.

The pre-1930s demolition rule does not stop houses being demolished, it just requires a resource consent to do so, allowing a check to ensure this activity is not something the city will regret.

¹ Heritage New Zealand, Submission on the Draft Spatial Plan

https://www.dropbox.com/sh/vk9hgfavgafxzwx/AABQ_8ZZ-E3cwso-rTC2wOTIa?dl=0&preview=Sanitized-DSP-1217-PFG-DraftSpatialPlan-Submission.pdf

WCC has not shown there is a material shortfall in housing capacity over the next 30 years (under the current rules), sufficient to justify removing the pre-1930s non-demolition rule to provide for intensified development. Furthermore, the Council's own growth figures indicate that the contribution required from Mt Victoria is small and is likely to be achieved even with the current, pre-1930s demolition rule fully in place.

As a minimum, the areas recommended by Heritage New Zealand to be added to Draft Spatial Plan proposed character areas, as shown in the Map in Appendix 1 of its submission and reproduced below, should be designated character areas.

MT VICTORIA



Extensions to Character sub-areas outlined in blue

- **The edge of Kent Terrace should be zoned Mount Victoria Medium Density Residential Zone, not City Centre.**

While the area around Kent Terrace, Home and Hania streets is a logical area for further development, given its proximity to the city and currently low-rise semi-industrial usage, incorporating it into the Central City zone allows for buildings 28.5 metres high without a

resource consent. This could result in a high ‘wall’ of buildings blocking Mount Victoria from the city. A better approach is to treat this as a transition zone between the city and the suburb, allowing medium density development (up to 6 storeys) in this zone – this would be achieved if it remains part of the suburb of Mount Victoria.

The logical boundary for the Central City at its extreme eastern edge is Cambridge Terrace. The green boulevard of The Terraces historically and geographically marks the most appropriate transition from city building heights to residential suburb.

The boundary for the official, New Zealand Geographic Board-defined suburb of Mount Victoria is down the middle of Kent and Cambridge Terraces, with Kent Terrace firmly within the bounds of Mount Victoria. This is supported by the Board’s guiding principles:

“The New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa recognises the importance of locality and suburb names and their extents.

. . . They [suburbs] are also important for government administration and provide identity and association for local communities – giving a sense of place and belonging.

The Board also recognises that populated places are bounded by naturally defined geographic boundaries or infrastructures. . . .

Having official suburb and locality names provides certainty, protects community identity, minimises the risk of incorrect naming, and ensures that the official name is used in official publications. . . .

The Mt Vic Planning Group has previously provided an outline (presented to a Mount Victoria residents public meeting on 3 September 2020) which would see a very large increase in dwellings along Kent Terrace, but with density done well and appropriately for such a medium-density residential zone.

- **Definition of character must include heritage**

The definition of character does not sufficiently take into account heritage, and must do so.

The only reason that Character Precincts in Mount Victoria have:

“common, consistent natural and physical features and characteristics that collectively combine to establish the local distinctiveness and identity of an area, and that contribute to a unique ‘sense of place’” [Draft District Plan definition]

is because they are consistently original, late-nineteenth/very-early-twentieth century buildings on the land i.e. because of their heritage. This is Mount Victoria’s and Wellington’s heritage.

The character, meaning and value of areas of Mount Victoria with particularly high heritage value has not changed since the current Operative District Plan was written. In its objectives, the City recognises the value of such heritage generally, and specifically and explicitly for Mount Victoria in the introduction to The Residential Guide, Appendix 2 Mount Victoria.

Wellington has a unique opportunity to protect this heritage for future generations of Wellingtonians and New Zealanders.

[Part 1 Definitions <https://eplan.wellington.govt.nz/draft/#Rules/0/142/1/14035/0>]

- **Include Tutchen Avenue in the Porritt Avenue character area**

It is illogical to exclude Tutchen Avenue, a tiny dead-end street barely one car's width, from the Porritt Avenue character area. There is no explanation or justification for this decision. If it is excluded and allowed to continue, the 21m (six-storey) height limit this will destroy not only the heritage of this street but also the character areas which surround it on every side.

This area must be included in the character area.

- **Change the Mt Victoria North Townscape Precinct to make it part of the Existing Character Precinct**

A new *townscape precinct* has been introduced to the area covering the north-facing McFarlane Street slope up to the Monastery. It is defined only by its visual appearance when viewed from the city and has been created to acknowledge one of Wellington's classic visual images.

As this new precinct area is already largely covered by the *Mt Victoria North Character Precinct*, and has the same heritage qualities as other Character Precincts (acknowledged by WCC in the Operative District Plan) it should be included as part of this existing precinct as a further defining characteristic of the *Mt Victoria North* area.

[Part 4 Design Guides https://isoplandocs.s3-ap-southeast-2.amazonaws.com/figures/wellingtonDraft/68/02_04_Design%20Guides%20Mount%20Victoria%20North%20Chapter.pdf]

- **Inadequate Character Precincts and Design Guides**

Mt Victoria's seven existing character sub-areas (now referred to as *character precincts*) should be maintained in their current Plan areas and that specific Design Guidance qualities be developed to ensure their future protection from inconsistent future development.

New developments in the Mt Victoria area were previously guided (in design terms) by seven character sub-areas included as part of the *Residential Design Guide*. The new Draft District Plan has significantly revised the content of the *Residential Design Guide*, removing any reference to *character* as an important general visual/social quality of the city that requires protection and design guidance when new development occurs.

In the new Plan, this general *character* designation has been reduced to a label attached to a number of *character areas* spread over the city's inner residential suburbs.

Mt Victoria's seven special character sub areas (Moir Street, Armour Avenue, Porritt Avenue, Scarborough Terrace, Queen Street, Elizabeth Street and Mt Victoria North/St Gerard's) have all experienced some reductions to their previously defined areas.

Although called 'Design guides' these documents offer no guidance as to how any new development could fit with the current character of the area. Instead, there is just a description of what is there currently. This approach offers no protection from future inconsistent development nor assistance to developers trying to ensure future developments fit into their surroundings. In summary, Mt Victoria's revised *character areas* would be toothless in terms of any future protection. Specific design guidance for these areas needs to be reinstated otherwise the council is failing to protect them.

- **Oppose minimum daylight access rule**

The requirement for the Medium Density zone that only "a minimum of 2 hours daylight into all habitable rooms between 9am and 3pm on the winter solstice" be provided, is unacceptable. (It is also illogical because, as long as the sun continues to rise, there will be 6 hours of daylight within this time period.)

The provisions for sunlight hours in the current Operative District Plan, should be retained. This will ensure dry homes and a reasonable, healthy quality of life for all in the neighbourhood.

[Part 3 MRZ-S15 <https://eplan.wellington.govt.nz/draft/#Rules/0/186/1/11302/0>]

- **Oppose granting of height exemptions for provision of "assisted housing"**

Developers should not be allowed to build higher than the limits specified in the District Plan in return for providing low-cost housing. They should be required to meet the same rules as for any other development in a MRZ. This right will be abused, if granted, particularly as the definition is very loose: 'cost for residents is less than the market rate'.

[Part 2 AH-P Option 3 <https://eplan.wellington.govt.nz/draft/#Rules/0/290/1/16504/0>]

Part 2 – Process

- **Deadline for submissions is 5pm on Tuesday, December 14.**
- Submissions can be made:
 - By downloading, completing and submitting the Council's online pdf form (includes all details necessary and allows free-form text):
https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0021/16914/FORM-5-District-Plan-changes-SUBMISSION-FORM.pdf
 - Online, using the Council's template:
 - written following your own format in an email or document.
- If using your own format, they can be:
 - emailed to planningforgrowth@wcc.govt.nz (Subject line: Submission on the Draft Spatial Plan)
 - posted (free) to the address on the hardcopy form
 - delivered by hand to 113 The Terrace, Level 16

- Essential details to include are name, email, address and whether you are making the submission on behalf of an organisation or as an individual
e.g. *This submission is made on behalf of an individual: Joe Bloggs, [email address], [address], [phone number].*