

Appendix 3

***Section 32 Report***

***Proposed District  
Plan Change 39***

**Controls on Residential Development in  
Newtown, Berhampore and Mt Cook**

**Includes amendments arising from  
the hearing of submissions**



# SECTION 32 REPORT - PROPOSED PLAN CHANGE 39

## PART I – RESIDENTIAL BUILDING STANDARDS IN NEWTOWN, BERHAMPORE AND MT COOK

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### 1. Introduction

Section 32 of the Resource Management Act (RMA) stipulates a requirement to consider alternatives and assess the benefits and costs of adopting any objective, policy, rule, or method in the District Plan. Before publicly notifying a proposed District Plan change, the Council is required to prepare a Section 32 Report summarising these considerations.

Plan Change 39 should be reviewed in conjunction with District Plan Change 38. Together these two plan changes seek to establish a management regime that will ensure that the residential character of Newtown, Berhampore and Mt Cook is maintained and enhanced. From a District Plan perspective there are two aspects to providing character protection:

1. Protecting those buildings, spaces and other features that contribute to the character in each suburb.
2. Ensuring that new buildings and developments recognise and enhance the character of the suburbs.

The first of these issues, regarding additional protection for existing streetscape and neighbourhood character buildings is covered by ongoing investigations regarding possible 'heritage areas' within the residential areas of Newtown, Berhampore and Mt Cook. The maintenance of streetscape character was also addressed by District Plan Change 38 which proposes to make the demolition of pre-1930's houses a Discretionary Activity, requiring resource consent from the Council. Applications for consent to demolish would be expected to demonstrate that either the existing building does not make a significant contribution to the streetscape character, or that the streetscape contribution made by the proposed replacement building will be as good, if not better, than the original dwelling.

Proposed District Plan Change 39 focuses on managing the effects of new buildings, particularly new multi-unit developments, to ensure that they do not degrade the character of these suburbs. The focus on multi-unit developments is a result of previous analysis that identifies multi-unit developments as having the greatest capacity to significantly alter the character of an area, street or neighbourhood.

A range of options were canvassed in the preparation of this proposed plan change and this report has been prepared to address the requirements set out in section 32 of the RMA.

### 2. Context

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management includes managing the use and development of natural and physical resources to enable people to provide for their health and safety. The Act also contains an explicit obligation for Territorial Authorities to *maintain and enhance amenity values* and the *quality of the environment*. Local authorities are also required to protect historic heritage from inappropriate subdivision, use and development. While this plan change seeks to manage the impact of development on the character of three inner city residential suburbs over time, it is acknowledged that this character largely derives from the fact that these are some of Wellington's oldest suburbs, hence they also have heritage value.

As noted in the introduction, this plan change aims to ensure that new residential buildings in Newtown, Berhampore and Mt Cook recognise and enhance the existing character of the suburbs. The work has three main parts:

1. Revision of the bulk and location standards in the District Plan to bring them into line with the physical characteristics of the area.
2. Preparation of a design guide to ensure that new multi-unit developments acknowledge and respond to the key characteristics of the area.
3. Revisions of the policy and the discretionary matters relating to multi-unit developments.

### 3. Policy Analysis & Consultation

The process which led to the development of this Plan Change has been lengthy, beginning in 1999 when an urban design evaluation of these areas was completed. More recently, the Council carried out a consultation process with the communities involved. The Council has recently prepared a Sense of Place Strategy and adopted the Built Heritage Policy (2005) for Wellington City both of which make reference to protection of the character of inner city suburban areas. Lastly, the Council has been involved in monitoring the level of development activity occurring in these suburbs. These pieces of work are summarised below to provide the reasoning for proposing this plan change. Details of other reports and meetings conducted are also listed for the record.

#### **Urban Design Evaluation - Mount Cook, Newtown, Berhampore**

In 1998, Graeme McIndoe (Architect and Urban Designer) and Deyana Popova (Urban Perspectives Ltd) were commissioned by Wellington City Council to undertake an urban design evaluation of the residential character of Newtown, Berhampore and Mt Cook. Their report was finalised in March 1999. Their key findings included:

- The southern inner residential area of Mt Cook, Newtown & Berhampore has a distinctive local character derived from the retention of a high proportion of inner city residential housing dating from the first decades of the 20<sup>th</sup> century.
- The age profile of the southern inner residential area (Mt Cook, Newtown & Berhampore) has strong similarities with Thorndon and Mt Victoria in that the majority of buildings were erected prior to 1920.

#### **Proportion of residential buildings built before 1919**

	Mt Cook	Newtown	Berhampore
Up to 1919	85%	82%	83%

- The character and type of residential buildings in the southern inner residential area is not particularly rare, but what remains is irreplaceable and important in defining the character of Wellington City as a whole.
- Multi-unit development is identified as the most important type of development in the study area as it has the greatest potential to alter the single unit character of the area. The study noted that while one house per site was the predominant trend in each suburb, the principle of in-fill housing and multi-unit development was consistent with the Council's policies on urban sustainability.
- Additions and alterations to existing buildings are the least important type of change. The area has absorbed this type of change over the past 90 years without significant loss of collective character.

The report concluded that while the southern inner residential area is not highly visible from the central city and does not have the iconic visual status of northern Mt Victoria, the concentration of original buildings and consistency of style is still significant. The study suggested implementing character based rules over the entire southern inner residential area, specifically implementing a rule to control demolition of pre-1930 buildings.

#### **Wellington City Council Sense of Place Policy**

Recognising and acknowledging the importance of the past also contributes to the community's understanding and awareness of a sense of place. This has been acknowledged in the *Wellington City Council Sense of Place Strategy*. The Council's goal for Wellington is quality of life, growth and prosperity. In striving for this goal, the Council wants to ensure that what makes Wellington special is preserved.

In preparing the *Sense of Place Strategy*, research was undertaken to determine what Wellingtonian's treasure about their city, and what gives the city its unique character or essence. From the range of factors identified, the following are relevant to proposed District Plan Change 39:

- the compact and integrated urban layout;

- the distinct character of communities, neighbourhoods, urban quarters and suburban centres – people and buildings – and the city’s confident, unpretentious personality; and
- the symbols, images, places and buildings that identify the people of Te Whanganui-a-Tara and Wellington city, and tell their history.

The Council will work to ensure that all new growth respects these values and, if possible, enhances them.

### ***Built Heritage Policy – Adopted by Council 28 June 2005***

The Council’s built heritage policy includes a number of objectives that, together, aim to achieve the vision that “*Wellington is a creative and memorable city that celebrates its past through the recognition, protection, conservation and use of its built heritage for the benefit of the community and visitors, now and for future generations.*”

One objective of the Policy is to protect the city’s built heritage from adverse effects that may compromise the heritage values of a place, including physical deterioration and inappropriate subdivision, development and use. This is relevant to this plan change because one action identified in the Policy is to “*extend the protection of heritage values to suburban areas through identifying more heritage areas and other mechanisms*”.

It is considered that some options presented in this report, while principally designed to protect ‘streetscape character’ do have the added benefit of preserving heritage values associated with the city’s oldest inner city suburbs.

### ***Urban Development Strategy (draft) - 2005***

The Council’s draft Urban Development Strategy provides a concept for managing growth in the City over the next 50 years. Projections indicate that Wellington City will grow by 30,000 people in the next twenty years. This level of growth will require approximately 14,000 new homes, based on an average occupancy rate of 2.1 persons per home. With the current trend towards smaller households it is anticipated that demand for higher density dwellings will continue to increase.

While the exact rate and type of growth experience will depend on a mix of local, national and international factors, there will be growth. The strategy recognises that if it is not managed well, this growth can destroy aspects of the city’s sense of place that are highly valued.

The challenge is to ensure that future growth and change reinforces the physical and spatial characteristics that make Wellington so distinctive; focuses on high quality urban design and development; and contributes to the stimulating and intense urban experience that Wellington offers.

To meet this challenge the Urban Development Strategy has developed the concept of a ‘growth spine’. The growth spine envisages continued ‘green-fields’ growth around the northern suburbs, but also has a strong focus on residential and commercial intensification along the main transport route from Johnsonville to Kilbirnie. Of particular relevance to the Newtown, Berhampore and Mt Cook Character Study is the proposal to intensify employment and housing along Adelaide Road from the Basin Reserve to the intersection with John Street. At this stage the growth spine is still very much a concept and no detailed investigation has been undertaken as to the scale and nature of development that could occur along Adelaide Road. It is important to note however that both the Strategy and the growth spine concept recognise that future growth should not come at the expense of existing character.

### ***Consultation process – late 2004 to present***

The Council initiated a consultation process with residents and other local groups to understand what the local community valued about the residential character of their suburbs and whether that character warranted additional protection. A survey was mailed to all ratepayers in October 2004 to gauge their views. In total, over 260 responses were received. This was followed by a series of workshops held with Newtown Residents Association, Mt Cook residents and design professionals.

The strong message delivered by the consultation was a desire for greater recognition and protection for the residential character of Newtown, Berhampore and Mt Cook in the District Plan. This included improved management of new building design, the bulk and location of new buildings, traffic and parking, infill and multi-unit development, earthworks and landscaping.

The summary of the survey results and workshop comments are available separately if required.

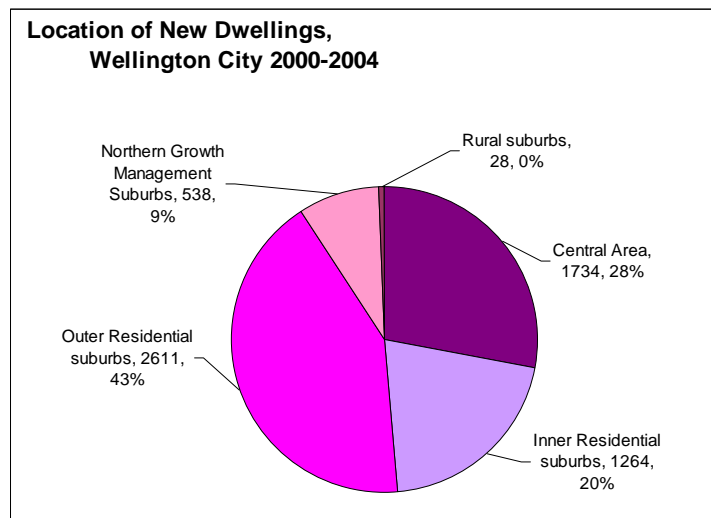
In September 2005 an update on the residential character work was sent to all of the pamphlet respondents, all workshop attendees, and all submitters on proposed District Plan Change 38. The update included a summary of proposed changes to the residential and multi-unit provisions that apply in Newtown, Berhampore and Mt Cook. Four responses were received, three generally in support of the proposed direction, and one in opposition on the grounds that the current provisions are working well and do not need modification.

A public meeting was held on 10<sup>th</sup> October 2005 to discuss the proposed changes to the residential and multi-unit provisions applying in Newtown, Berhampore and Mt Cook. The meeting had an attendance of 18 including two Councillors, and representatives of Newtown Residents Association, Historic Places Trust, and the residents of Newtown, Berhampore and Mt Cook.

### Development Activity in Newtown, Berhampore and Mt Cook

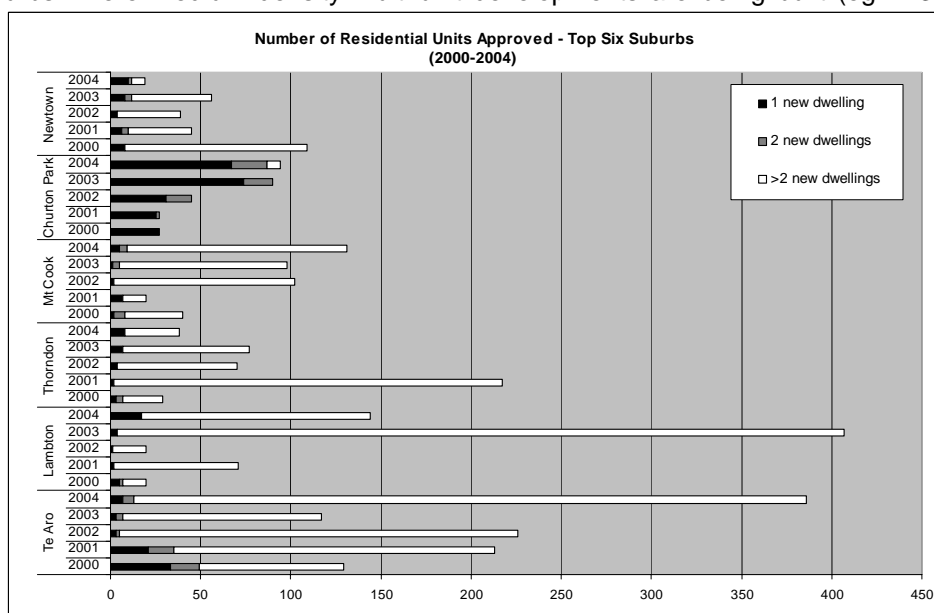
The Council's District Plan Monitoring Programme includes a number of indicators relating to urban form and growth and related residential activities. These indicators (summarised below) collectively show that there is considerable residential growth occurring in these three suburbs.

The first graph (to the right) shows that new dwellings are being built throughout the city. However it is notable that almost half of that growth is occurring in the central city or inner residential areas; a land mass half the size of the outer residential area (ie. there is 551 hectares of Central Area and Inner Residential Area zoned land, compared to 1002 hectares of Outer Residential Area). Specifically, 20% of new dwellings were located in the Inner Residential Areas.



The second graph shows that the greatest growth is occurring in the City's Central Area, however that growth is a particular housing form (ie. apartments). Whilst the suburbs of Mt Cook and Newtown are 4<sup>th</sup> and 6<sup>th</sup> respectively on the graph (in terms of how many dwellings have been constructed in those areas), they are the two main suburbs where medium density multi-unit developments are being built (eg. 2-3 storey townhouses). As a result, multi-unit developments have introduced a significantly different style of housing into suburbs that traditionally feature one or two storey wooden villas or cottages, and one house per site.

To complement these findings, an analysis of the Council's demolition building consents was carried out to see if any trends emerged relating to the rate of demolition in the Inner Residential Areas. Of particular interest was the rate of



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demolition in Mt Victoria and Thorndon, before and after the 1930s demolition rule was introduced in 1998. Consents for demolition in Newtown, Berhampore and Mt Cook during the same period were also examined for comparison.

A ten year study period was chosen (1995-2005) whereby all demolition consents for the city were selected. A total of 666 demolition consents were in the sample size. After removing all consents not within the study areas and any consents for demolition of accessory buildings (which are not subject to the 1930s rule), the following results occurred:

- 21 demolition consents were approved in the Mt Victoria and Thorndon areas in the study period (eg. Chapter 5, Appendix 9 of the District Plan). This equates to 3.1% of all demolition consents from the sample.
- Nine of the 21 consents were approved prior to the 1930s demolition rule coming into force in October 1998 (1995-October 1998). Six consents were approved while that rule was still going through the Council plan variation process (meaning that planners still had to give weight to the Transitional Plan - Oct 1998-July 2000). Six consents were approved in the five years since the variation was made operative.
- 45 demolition consents were approved for Newtown, Berhampore and Mt Cook within the study period. This equates to 6.7% of all demolition consents in the study period.
- Of those 45 consents, 13 were granted prior to October 1998. The remainder 32 have been approved in the time since then.

The results for Mt Victoria and Thorndon show that the rate of demolition in these suburbs has declined significantly since 1998 and that it is almost certain that this is a direct result of the 1930s demolition rule being introduced.

Demolition in Newtown, Berhampore and Mt Cook has continued at a higher rate. It is possible that when the demolition rules were applied in Mt Victoria and Thorndon, that some of the pressure for redevelopment shifted to Newtown, Berhampore and particularly Mt Cook (given the high rate of multi-unit dwellings approvals in that area).

To summarise, the suburbs of Newtown, Berhampore and Mt Cook are undergoing significant change, due to a large increase of dwelling units being built in the areas. Demolition of existing homes has occurred in a number of situations to make room for these multi-unit developments. The data supports local anecdotal concerns that the suburbs are undergoing significant change and that this change is threatening the residential character of these areas.

At present there are no provisions in the District Plan that relate specifically to the character of Newtown, Berhampore and Mt Cook. Given community concern raised by recent demolition and multi-unit developments, it is considered that this issue should be addressed as soon as practicable.

### **Key documents**

- McIndoe, G and Popova, D (1999) Wellington Inner City Residential Areas Urban Design Evaluation, Mount Cook, Newtown, Berhampore
- Original survey response sheets and excel spreadsheet with summary of survey responses – November 2004
- Notes from workshops held in February 2005.
- Council Report to Strategy and Policy Committee (June 2005) Monitoring the Efficiency and Effectiveness of the District Plan.

### **Key discussions/briefings**

- Workshop for Architects, Conservation Architects and Historic Places Trust (8 March 2005)
- Workshop for Newtown Residents Association (21 March 2005)
- Workshop for Mt Cook Residents (23 March 2005)
- Public Meeting (10 October 2005)

***Consultation, in accordance with the First Schedule of the RMA 1991***

- Ministry for the Environment
- Greater Wellington Regional Council
- Wellington Tenth's Trust
- Te Runanga O Toa Rangatira Inc

#### 4. Options

##### Objectives

Section 32 requires the Council to be satisfied that the objectives in the district plan are the most appropriate means of achieving the purpose of the RMA. Proposed District Plan Change 39 does not change any of the objectives in the District Plan, so this evaluation is not relevant in this case.

##### Policies, rules and other methods

Section 32 requires the Council consider whether the policies, rules and other methods used in the district plan are the most appropriate method of achieving the plan’s objective. In terms of managing the effects of activities in Residential Areas, the District Plan has adopted a rule based regime, based on provisions of a limited range of activities. This approach has been thoroughly considered though the plan preparation, submission and hearing process when the District Plan was originally notified. It is therefore not proposed to reconsider the merits of this approach in this report.

The table below considers the cost and benefits of the four core options considered during the preparation of proposed District Plan Change 39

Option	Key Features	Advantages	Costs and Risks
<p><b>Option 1 – Do nothing, Status Quo</b></p> <p><i>Retain the current District Plan provisions in relation to building bulk and location, and the management of multi-unit developments.</i></p>	<p>Retain the existing provisions relating to building height, site coverage, sun light access etc.</p> <p>Multi-unit developments resulting in three or more units on a site require consent. Applications are considered against the general Multi-Unit Design Guide</p>	<p>No cost in terms of time and resources required to process a plan change.</p> <p>Current rules are established. No requirement for district plan practitioners to become familiar with new provisions.</p> <p>Would not constrain developments already in the planning phase.</p> <p>No impact on properties that have been purchased with a view to potential re-development.</p>	<p>The current District Plan provisions are permitting a level of development that can be detrimental to the residential character of the three suburbs.</p> <p>If no amendments are made to the current provisions there is the potential that future developments (particularly multi-unit developments) will continue to degrade the existing residential character through:</p> <ul style="list-style-type: none"> <li>• Building bulk that is out of scale with adjoining buildings.</li> <li>• Lack of green space and ground level open space on site.</li> <li>• Poor quality design and a lack of façade relief.</li> </ul>
<p><b>Option 2 – Do nothing at this time and consider issues of residential character as part of a city-wide analysis of urban development, containment, and</b></p>			

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<p><b>residential infill.</b></p> <p><i>Wait until a comprehensive, city-wide plan change is put forward for notification.</i></p>	<p>The Council's draft Urban Development Strategy considers options for accommodating growth within Wellington City over the next 50 years. It includes the concept of a 'growth spine', which proposes to concentrate commercial and residential growth along the main transport corridor stretching from Johnsonville, through Newtown to Kilbirnie.</p> <p>Implementation of the growth spine concept will require re-consideration of the Council's current policy of promoting residential intensification throughout the city. This work could have significant implications regarding the manner in which the District Plan manages the effects of subdivision and multi-unit development.</p> <p>Further work regarding the management of infill and multi-unit development in Newtown, Berhampore and Mt Cook could be postponed pending resolution of these issues city wide.</p>	<p>Proposed District Plan Change 39 has been developed in accordance with the District Plan's objectives relating to provision of residential infill and maintenance of residential amenity. If the Council's objectives in these areas alter significantly as a result of the preparation and consideration of the Urban Development Strategy, then it is likely that many of the areas covered by proposed Plan Change 39 will be revisited again in the short to medium term.</p> <p>If the review of multi-unit development in Newtown, Berhampore and Mt Cook were part of a city wide re-consideration of the provision of residential intensification, then the potential impacts on these suburbs could be assessed in light of the comprehensive.</p>	<p>The suburbs of Newtown, Berhampore and Mt Cook represent that last major area of Inner Residential Area land in the City that has not been reviewed in terms of management of residential character.</p> <p>Many of the changes put forward in Proposed Plan Change 39 are the result of analysis of the areas existing residential character. These changes include the revision of building height, site coverage, front yard and ground level open space provisions. Irrespective of the outcome of possible future work generated by the Urban Development Strategy, these changes remain valid in relation to controlling new building works in these suburbs. As such there is merit in implementing these provisions without delay.</p>
<p><b>Option 3 – Revised regulation based on current plan provisions.</b></p> <p>This is the <b>recommended option.</b></p> <p><i>Revise current District Plan provisions to provide additional focus on building bulk, provision of on site open space, and the quality of design of</i></p>	<p><u>Building Bulk</u></p> <ul style="list-style-type: none"> <li>• Revise bulk and location rules to better reflect the existing character of the area. Specifically building height and site coverage</li> <li>• Provide more specific design guidance for new developments</li> <li>• Introduce new discretionary elements and assessment criteria</li> </ul>	<p>Option 3 works within the parameters of the existing District Plan structure. This structure that has been tested and confirmed through the plan preparation and appeal processes.</p> <p>Option 3 represents a refinement of the existing District Plan provisions. As such the provisions and approach will be familiar with existing plan practitioners.</p>	<p>The new requirement to provide ground level open space (based on the number of units) is likely to alter the composition of household units that can be developed on any given site.</p> <p>Council currently has a policy of encouraging residential intensification throughout the City. Lowering site coverage and building height will reduce the overall development potential of sites</p>

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<p><i>new multi-unit buildings.</i></p>	<p>to rule 5.3.10 to cover building bulk and provision of ground level open space</p> <ul style="list-style-type: none"> <li>• Add text to policy 4.2.3.3 to clarify the application of permitted baseline to multi-unit developments</li> </ul> <p><u>Lack of on-site open space</u></p> <ul style="list-style-type: none"> <li>• Increase front yard requirement to 3 metres</li> <li>• Install a requirement to provide ground level open space on site, either per unit or as shared open space</li> <li>• Install two new policies to provide direction on issues of open space and provision of hard surfacing.</li> </ul> <p><u>Quality of building design</u></p> <ul style="list-style-type: none"> <li>• Implement design guide for multi-unit developments</li> <li>• Apply design guide to any development that will result in two or more units per site</li> <li>• Require applicants to submit a cross section of the façade showing depth and relief</li> </ul>	<p>Option 3 is consistent with the District Plan's objectives relating to the sustainable management of the Inner Residential Area.</p> <p>Multi-unit developments in these suburbs already require resource consent for a Discretionary Activity (Restricted). Installing an appendix to the Multi-Unit Design Guide covering Newtown, Berhampore and Mt Cook will not require additional applications for resource consent.</p> <p>Applying the Multi-Unit Design Guide to new developments that result in two or more units on a site, and requiring ground level open space per unit will reduce the number of developments that seek to utilise subdivision as a means of avoiding consideration against the multi-unit design guide.</p> <p>The proposed height standard more accurately reflects the existing building height across the three suburbs. The 9 metre height strikes an appropriate balance between permitted building height and maintaining a standard that is flexible enough to cope with the varied terrain found in the area.</p> <p>Many new multi-unit developments are visually dominated by buildings and hard sealed vehicle manoeuvring areas, often at the expense of green space. The introduction of an open space requirement will moderate the maximum density of new developments and better enable them to provide for on-site ground level open space.</p> <p>The proposed front yard provision will ensure that new buildings respond to one of the basic built characteristics of the suburbs, which is a reasonable set back of buildings from the street frontage. Provision of a 3 metre front</p>	<p>in Newtown Berhampore and Mt Cook, which will impact on the contribution these suburbs can make to provision of residential intensification citywide.</p> <p>For owners of properties that already exceed the proposed height standard of 9 metres in height, the new standard may result in the need to seek resource consent approval to undertake new building work, including additions and alterations.</p> <p>The amendments to the on-site development potential could require revision of development proposals still in the planning phase.</p> <p>The new requirements will apply the multi-unit design guide to developments that will result in two or more units per site. This will require infill development proposals (involving the addition of one extra unit to a site) which are currently a permitted activity to apply for resource consent. This will involve a cost, and possible delay to the undertaking of such developments.</p> <p>The proposed amendments could negatively impact on owners of properties that have been purchased for the purpose of potential redevelopment.</p>

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Option	Key Features	Advantages	Costs and Risks
		<p>yard will also provide sufficient space to incorporate planting into the design of new developments.</p> <p>At present the requirement to provide ground floor open space is contained in the multi-unit design guide and not as a rule. As a result the ground level open space is often substituted by an elevated deck to make room for buildings and vehicle manoeuvring space. The result is a lack of open and green space on many sites. The intention of the new rule is to require a significant amount of open space (either private or shared) to be provided on site.</p> <p>A design guide has been prepared to identify the key characteristics of the three suburbs, and address the issues raised by new multi-unit developments locating in the area. The design guide describes the existing character of each of the three suburbs, and identifies the defining features of the existing building stock.</p> <p>Monitoring of developments has indicated that the design guides have not been as affected as anticipated. This is partially attributable to the development of the 'permitted baseline' concept. To proposed plan change will redress the balance between permitted activity standards and the design guide assessment.</p> <p>The proposed plan change is likely to result in a reduction in community frustration regarding the effects of multi-unit development in Newtown, Berhampore and Mt Cook.</p> <p>The design guide identifies that well articulated front elevations are a key feature of the area. A lack of depth and articulation on the front elevation is a contributing factor in preventing some new developments from complementing their surroundings. To help rectify this it is proposed to introduce a requirement in the</p>	

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Option	Key Features	Advantages	Costs and Risks
		<p>District Plan that applications for resource consent for multi-unit developments contain a vertical cross section of the front façade, which shows the depth and relief of elements contained within the facade.</p>	
<p><b>Option 4 – Revised regulation based on new character based criteria.</b></p> <p><i>Restructure the residential bulk and location standards that apply in Newtown, Berhampore and Mt Cook to allow new developments to replicate the built form of the early 20<sup>th</sup> century.</i></p> <p><i>The characteristic built form in Newtown, Berhampore and Mt Cook is for houses to be oriented to face the street and located towards the front of the site. Side yards are often very small, with less than a metre separating houses on adjacent sites. Heights are generally one or two storeys, though sometimes the height is exaggerated by a sites sloping topography.</i></p>	<p>Remove the current uniform maximum building height. Set maximum building height according to the height of existing buildings on adjacent sites.</p> <p>Decrease site coverage to match existing patterns in each suburb (30-45%).</p> <p>Relax sunlight access provisions to allow new buildings to build up to two stories (6.8 metres) on the side boundaries.</p> <p>To mitigate the effects of the relaxed sunlight access planes, restrict building work to that area of the site that is in line with the houses in adjacent sites.</p> <p>Put in place rear yard provisions to reinforce established patterns of building location and useable open space.</p> <p>Remove the current car-parking requirement (1 per unit) to allow sites to be developed without the need to devote large areas to vehicle manoeuvring and parking.</p> <p>Implement a design guide for multi-unit developments.</p>	<p>Option 4 would permit new buildings to faithfully replicate the traditional building style of Newtown, Berhampore and Mt Cook. Under the current bulk and location provisions in the District Plan it is difficult, if not impossible to build a structure that replicates the existing built characteristic. In particular, the sunlight access planes restrict development close to side boundaries, requiring taller buildings to locate towards the centre of the site. The sunlight access planes proposed in Option 3 would permit a two storey building to be erected up to the side boundary.</p> <p>Analysis of new developments in Newtown, Berhampore and Mt Cook indicates that development up to the current permitted building height of 10 metres can result in buildings that are significantly taller and larger than existing buildings on neighbouring sites. Option 4 would restrict new building height to a height that matches the existing buildings on adjoining sites. This would ensure that the height of new buildings is always 'in scale' with surrounding properties</p> <p>A study of rear yard patterns across each of the three suburbs confirmed that rear yards were a consistent feature, but the scale of the yards varied wildly, from 0.5 metres up to 23.5 metres, with an average of approximately 9 metres. Installing a rear yard rule could potentially achieve a number of outcomes.</p>	<p>Option 4 would represent a significant departure from the District Plan's current approach to managing development in residential areas. Having a unique planning approach in three suburbs creates an additional layer of complexity to the District Plan.</p> <p>There is a risk of un-anticipated environmental results from implementing a significantly revised planning regime in these three suburbs.</p> <p>The revised sunlight access planes dramatically increase the potential building bulk close to the side boundary of a site. This could have significant impacts on sunlight, daylight and privacy for adjoining neighbours. While owners of 'tightly packed' character villas generally accept this development pattern as the existing status quo, property owners that currently enjoy unobstructed side boundaries are unlikely to be willing to forego on site amenity for the sake of allowing a neighbouring property to be developed according to the residential character of the neighbourhood.</p> <p>To minimise the adverse impact on neighbouring properties of taller buildings built close to the boundary, it is considered that permitted buildings would need to be restricted to the portion of the site in line with the front and rear walls of adjoining houses. This restriction would significantly reduce the flexibility in building location provided by the current plan provisions</p>

## Appendix 3

Option	Key Features	Advantages	Costs and Risks
	<p>Apply design guide to any development that will result in two or more units per site.</p> <p>Require applicants to submit a cross section of the façade showing depth and relief.</p>	<p>These include:</p> <ul style="list-style-type: none"> <li>• Retention of a reasonable area of open space on site.</li> <li>• Retention of greenery and vegetation on site.</li> <li>• Retention of privacy and protection from overlooking for neighbouring properties</li> <li>• Encourage new buildings to be constructed to the front of the site as per the traditional building pattern in Newtown, Berhampore and Mt Cook.</li> </ul> <p>Removing the car-parking requirement for new multi-unit developments would allow developments to more faithfully reproduce the traditional built form and development pattern. It would allow developments to focus on achieving a positive layout, rather than focusing on the ability to access each unit by motor vehicle. There may also be flow on benefits in terms of promoting other forms of transport within the inner city.</p> <p>The benefits of implementing a design guide for multi-unit developments as part of Option 4, would be the same as identified for Option 3 above.</p>	<p>In terms of setting building heights based on the existing building height of adjoining buildings. This approach is used to control building heights in the Thorndon Character Area. While this approach works well in the Thorndon Character Area (which is limited in size and has a fairly uniform building stock), it is considered that it would be difficult and impractical to administer a similar approach across Newtown, Berhampore and Mt Cook because of the diverse building stock and varied topography. It is also potentially unfair as the development potential of any given site would be determined by the existing bulk and scale of neighbouring properties.</p> <p>There are pro's and con's with installing a rear yard provision. While a rear yard would encourage retention of a significant area of open space on site, the location of this open space would be restricted to the rear of the property when it could have higher amenity and greater functionality elsewhere on site. Similarly the effectiveness of using a yard provision to dictate building location and protect privacy would depend heavily on the dimensions of the subject site. While acknowledging that a rear yard rule could have some positive effects, at this time it is considered that the benefits accrued are not be sufficient to justify the cost and potential inconvenience of a blanket rule.</p> <p>Removing the current car parking requirement is considered inappropriate. Such a move may encourage some residents living close to the City to dispense with a car in favour of walking and public transport. However currents trends show increasing car ownership rates. Removing the on-site car parking requirement would simply displace the car parking on to the street. It is considered that car ownership rates would continue to increase until deterrents such as a lack of available on-street parking and traffic congestion</p>

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			become so bad as to make car ownership unattractive. Consultation with local communities has indicated that they do not support increased on street car parking for the sake of preserving residential character.

### 6.0 Conclusion

The suburbs of Newtown, Berhampore and Mt Cook have a distinctive local character derived from the retention of a high proportion of inner city residential housing dating from the early decades of the 20<sup>th</sup> century. The age profile of the southern inner residential area (Mt Cook, Newtown & Berhampore) has strong similarities with Thorndon and Mt Victoria in that the majority of buildings were erected prior to 1920. While the character and type of residential buildings in the southern inner residential area is not particularly rare, what remains is irreplaceable and important in defining the character of Wellington City as a whole.

This report has considered a number of options to respond to this resource management issue, ranging from retention of the status quo (Option 1) through to adopting a revised set of planning standards that would require all new developments to build to the traditional bulk and location characteristics of the area (Option 4).

Option 1 (retention of the existing provisions) is not recommended on the grounds that analysis and monitoring have indicated that the current District Plan provisions cannot ensure that new multi-unit residential developments will maintain and enhance the residential character of Newtown, Berhampore and Mt Cook. Accordingly option 1 is not favoured.

Option 2 would delay making any changes to the current provisions pending a city wide analysis of options regarding provisions of infill and multi-unit development. While there is some merit to this approach it is considered that proceeding with proposed Plan Change 39 will not prohibit further changes being made at a later date as a result of additional research, monitoring and consideration. In the meantime there are identified benefits of revising the current rule structure applying in Newtown, Berhampore and Mt Cook. Accordingly, Option 2 is not recommended.

Option 4 suggest installing a set of district plan provisions that would require new developments to mimic the traditional bulk and location patterns found with the three suburbs. This would represent a significant departure from the District Plan's current approach to managing residential areas. In particular the requirement to locate new buildings in line with properties in either side to preserve existing amenity would significant reduce the flexibility and design options for new developments. Prescribing a single development type in this manner is considered to be unlikely to facilitate the efficient and effective development of the residential environment. Accordingly, Option 4 is not recommended.

This report recommends that Option 3 be adopted because it is focused on and will address the key issues that can cause new multi-unit developments to cause a loss of character and streetscape values. These are uncharacteristic building bulk, lack of green space on site, and a lack of façade relief and overall design quality. **Accordingly Option 3 is recommended.**

On balance it is considered that Option 3 best meets the requirements of section 32 of the Resource Management Act as it represents the most appropriate means of achieving the residential objectives of the District Plan.