

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471671  
**Date:** Sunday, 24 April 2022 12:45:33 pm

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## Submitter details

**First name:** Heng  
**Last name:** Hu  
**Address:** 27 hathaway ave  
**Suburb:** karori  
**City:** wellington  
**Phone:** 0212531269  
**Email:** vhu1018@gmail.com

## Application details

**Applicant name:** Heng Hu  
**Site address:** 26 donald st  
**Service request number:** 471671  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

Noise impact during construction; The purposed buildings are too high so there are more shadows during winter time (my site address is 58 Donald st). The main water pipe is not suitable to add 300+ units as it was designed for university.

### Aspects of the application that you are neutral towards:

NA

### The reasons for my / our submission are:

### The decision I / we would like Wellington City Council to make is:

Update the design to lower the building height.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Wednesday, 27 April 2022 12:59:40 pm

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## Submitter details

**First name:** Margaret  
**Last name:** Halton  
**Address:** IA 703 / 134 Burma Rd  
**Suburb:** Johnsonville  
**City:** Wellington  
**Phone:** 0274769482  
**Email:** margaret.halton@xtra.co.nz

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald St and 37 Campbell St, Karori  
**Service request number:** SR471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I support the development of a Ryman Retirement village in Karori. It's design will fit in well with a residential area. The landscaping is appealing and the effect on neighbours minimal when compared with the previous use of the site as a college of education.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

Karori is a large suburb and needs more Retirement villages. It will also free up houses for the general population when there is a housing shortage. The presence of such a village will have a positive effect on the local business community. I lived in Karori for 50 years and only moved because this village was not yet established.

### The decision I / we would like Wellington City Council to make is:

Approve the submitted plan.

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Tim Prescott

Address of submitter: 3B/3 Clyde Quay Wharf, Te Aro 6011

Phone (day):

Mobile:

0274456240

Email: [tim@prescott.co.nz](mailto:tim@prescott.co.nz)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

I support the Ryman Healthcare submission for the following reasons;

The former Teachers College is an ideal location for a retirement village. Residents will have easy access to the centre of Karori and it is a short distance to Wellington City.

High quality buildings and landscaping.

The village is designed to specifically meet the needs of residents for ease of living.

Need for all levels of care in the community including rest home, hospital, dementia and serviced care.

Investment in the local economy providing critical healthcare infrastructure, construction jobs and a range of other jobs when the villages are operational.

Provides certainty and guarantees the revitalising of this prominent Karori site.

Alleviates pressure on the housing system by releasing homes to the market when residents move into the village.

**The reasons for my submission are:**

**The decision I/we would like Wellington City Council to make is**  
(include any conditions of consent you would like to see imposed):

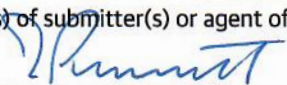
**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*



Date

29/04/22

**Note:**

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- it contains offensive language
- it discloses no reasonable or relevant case
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further

**Privacy information**

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Friday, 29 April 2022 1:00:07 pm

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## Submitter details

**First name:** RICHARD  
**Last name:** HESOM-WILLIAMS  
**Address:** 16 BLAKEY AVENUE  
**Suburb:** KARORI  
**City:** WELLINGTON  
**Phone:** 0274816353  
**Email:** hesomwilliamsr@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald and 36 Campbell Sts, Karori  
**Service request number:** SR471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

High quality retirement village in Karori.  
Central site allows easy mall & library access.  
Broad range of care options in one location.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

Enjoy living in Karori and would prefer not to need relocation when choosing my retirement location.

### The decision I / we would like Wellington City Council to make is:

Allow Ryman development to proceed.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Sunday, 1 May 2022 5:22:53 pm

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## Submitter details

**First name:** Jan  
**Last name:** Heynes  
**Address:** 14 Tisdall Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 044768714  
**Email:** janheyne@xtra.co.nz

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street & 37 Campbell Street Karori  
**Service request number:** SR471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

As one of the largest suburbs in the Wellington region, Karori is lacking in high quality retirement facilities. The proposed site is ideal as it is a sunny situation with excellent access to all the facilities Karori has to offer, as well as a good bus service.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

I would like to be able to remain in the suburb where I have spent all my life, with the expectation of good quality care at all levels of personal needs.

### The decision I / we would like Wellington City Council to make is:

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: DONALD C CRAIG

Address of submitter:

12 LANCASTER ST. KARORI.

Phone (day): 4768206

Mobile: 0274 430

Email: DON-VAL @ XTRA . CO. NZ.

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

KARORI NEEDS THIS DEVELOPMENT. IT IS WELL SITED, CLOSE TO TRANSPORT, SHOPS, LIBRARY AND KARORI'S CENTRE. THIS IS AN IMAGINATIVE DESIGN AND WILL BE A GREAT ASSET. IT WILL HELP FREE UP ABOUT 200 HOMES TO ALLOW OUR SUBURB TO GROW, AND HOUSE THE NEXT GENERATION. IT IS A NEAR FLAT SITE, IDEAL FOR OLDER CITIZENS.

**The reasons for my submission are:**

THIS DEVELOPMENT WILL HELP KARORI TO GROW. KARORI HAS A NEED TO HOUSE IT'S OLDER PEOPLE IN THE SUBURBS WHERE THEY LIVE NOW.

**The decision I/we would like Wellington City Council to make is**  
(include any conditions of consent you would like to see imposed):

APPROVE THIS DEVELOPMENT.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Donald Craig

Date

27-04-2022.

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy



# Submission on resource consent application

## Notes for the applicant

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670



Support the application



Oppose the application



Neutral

## Submitter details

Name of submitter: Kevin Carr

Address of submitter: Flat B05, 10 Ebor Street, Te Aro, Wellington

Phone (day):

Mobile:

021 1205503

Email:

[carrkc@xtra.co.nz](mailto:carrkc@xtra.co.nz)

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

I have not been able to study the plans in full but what I have seen I believe will be an asset to Karori and older people, such as my wife and I, and we fully support the proposal.

The village is well set out and has space for relaxing with the retention of some of the existing bushes and the planting of new shrubs and gardens.

**The reasons for my submission are:**

The village will provide for my future with independence and the provision of care if required. I have lived in Karori for some 50 years. This would allow me to continue to live in Karori where we have friends and are within walking distance of the Mall, Bridge Club, Library, Church and bus.

It will also result in a significant number of houses becoming available when people move into the village reducing the housing shortage in Wellington.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**


I would like to see Wellington City Council approve the proposal as soon as possible so that it can be built and allow me to move while I am still able to do so.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)* 	Date 29 April 2022
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**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Monday, 2 May 2022 9:38:14 am

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## Submitter details

**First name:** Darko  
**Last name:** Petrovic  
**Address:** 5/12 Stanley Street,  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 0212671584  
**Email:** Darkopetrovic@gmail.com

## Application details

**Applicant name:** Darko Petrovic  
**Site address:** 5/12 Stanley Street, Berhampore  
**Service request number:** 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I fully support the development, namely the amount of housing that the development provides as well as the capacity for specialised care for our most vulnerable segment of the elderly population.

Additionally, the economic boost to Wellington from the development and construction work itself is welcome support in a post-covid economy.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

I fully support most development work in Wellington City especially at a time when there is a mass housing shortage and the economy requires a significant post-pandemic boost.

### The decision I / we would like Wellington City Council to make is:

Approve the development in its entirety.

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Sandra Lamb

Address of submitter: 81 Silverton Rd  
RD 2 Napier 4182

Phone (day): 06 844 7570

Mobile: 027-213-3322

Email: [lamb.moretta@farmside.co.nz](mailto:lamb.moretta@farmside.co.nz)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

We were really excited to hear that the old training college site was to become a Ryman village, and put our names down on the waiting list 3 years ago. The delays have been very disappointing.

Karori is an excellent location for retirement living, with good bus services to Zealandia, Otari bush, and the cemetery nearby for walking. The library is just next door and looks very inviting too. We like the availability of further care options, like dementia care - 3 of our 4 parents needed dementia care in their 80's so it's good to plan ahead.

We have experience of Ryman care through parents and friends' parents. They offer an excellent service, and are a trusted New Zealand company.

The reasons for my submission are:

We want to live there, pure and simple, and just can't believe that resource consent has taken so long.

The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):

Approve the application as it stands

Note: Select one.

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

Oral submission at the hearing

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

*A Lamb*

Date

2-5-22

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How do you wish to be served with any correspondence

email *lamb.moretta@farmside.co.nz*

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Helen Carr

Address of submitter: Flat B05, 10 Ebor Street, Te Aro, Wellington

Phone (day): 04 3812450

Mobile:

Email: [chelen@xtra.co.nz](mailto:chelen@xtra.co.nz)

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

I have seen the presentation by Ryman and I believe it will be an asset to Karori and older people, such as my husband and I, and we fully support the proposal.

**The reasons for my submission are:**

The village will provide for my future with independence and the provision of care if required. I have lived in Karori for many years. This would allow me to continue to live in Karori where we have friends and are within walking distance of the Mall, Bridge Club, Library, Church and bus.

The proposed village will be a significant investment in the local economy providing construction jobs initially and a range of other jobs when the village is operational.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

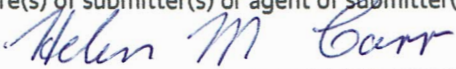
I would like to see Wellington City Council approve the proposal as soon as possible so that it can be built and allow me to move while I am still able to do so.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)* 	Date 29th April 2022
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**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for No idea?  
**Date:** Monday, 2 May 2022 5:02:24 pm

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## Submitter details

**First name:** Geraint  
**Last name:** Scott  
**Address:** 3/42 Cambridge Terrace  
**Suburb:** Waiwhetū  
**City:** Lower Hutt  
**Phone:** 0226830614  
**Email:** geraintmusic@gmail.com

## Application details

**Applicant name:** Ryman Healthcare?  
**Site address:** Ex Vic uni teaching campus Karori?  
**Service request number:** No idea?  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

**Aspects of the application that you support or oppose:**  
Creating centralised care and support for the elderly, freeing up local housing, contributing to a richer community landscape in Karori.

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**  
The reasons listed above, as well as countering local opposition to the project. The opposition seen in the media is classic NIMBYism and is the kind of backwards thinking that prevents modern cities catering to the needs of their people.

**The decision I / we would like Wellington City Council to make is:**  
Let Ryman build the village



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Wednesday, 4 May 2022 12:20:48 pm

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## Submitter details

**First name:** Susan  
**Last name:** Harper  
**Address:** 162 Daniell Street  
**Suburb:** Newtown  
**City:** Wellington  
**Phone:** 0276027701  
**Email:** susan@sean.geek.nz

## Application details

**Applicant name:** Rymans  
**Site address:** 26 Donald St  
**Service request number:** SR 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

1. I strongly support the building of a large aged housing and care facility in central Karori. I think it will help families and friends stay in touch; I have had family in such facilities and it is very much easier to visit when they are in close suburbs.
2. I strongly support using this particular site in this way. I lived at 33 Donald St in the late 1980s, Central Karori is easy to get around without driving and that access to the cafes, library, pool and shops will help residents remain as independent as they choose for as long as they are able. Also the sights and sounds of the nearby primary school will be positive for less able residents.
3. I think the adjustments to the design are good, and the current plans should be built. As someone who has taken preschoolers to visit their great-grandmother, I very much appreciate the parking underneath the buildings.

### Aspects of the application that you are neutral towards:

#### The reasons for my / our submission are:

I have a fair number of older friends and a few aging family members in Karori and nearby suburbs, and a fondness for the neighbourhood and site. I feel they're a good match and want the facility built.

#### The decision I / we would like Wellington City Council to make is:

I strongly support the building of a large aged housing and care facility in central Karori, and I think this particular proposal is good. Please give resource consent so it can go ahead.

# Submission on resource consent application

## Notes for the applicant

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington ✓

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: J. S. McPHERSON

Address of submitter: PO Box 3559  
WELLINGTON 6140

Phone (day): 04 388 4709      Mobile: Nil

Email: Nil

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

A WELL RUN RETIREMENT VILLAGES  
IN KARORI.

**The reasons for my submission are:**

SEE P1.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

SUPPORT THE VILLAGE - IN KARORU

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)* <i>J McPherson</i>	Date <i>4.5.22</i>
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- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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**How do you wish to be served with any correspondence**

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# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

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**Resource Consents**  
**Wellington City Council**  
**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Michelle Janse

Address of submitter:

14 Edgeware Rd Wilton Wellington

Phone (day): (04) 9792595

Mobile: 0272319987

Email:

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

There is a need for retirement village options handy to the city & to family. The end result will be a safe, attractive environment that is an asset to the community. Care is taken to make them park-  
Waiting lists for such places are getting longer. Homes come on to the market when older people move into retirement villages  
Living alone is a big risk these days.  
The village life is so much better, hassle free & fun.

**The reasons for my submission are:**

I know several people living alone that are on waiting lists -  
They do not want options too far away from families.

**The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):**

Agree the proposals. I have been to presentations & the plans are attractive & complementary to the location. Not at all intrusive to the neighbourhood as a high rise block of flats would be.  
A quick decision by Council - Older people deserve comfort & peace of mind.

**Note:** \*Select one.

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- I/we wish to speak in support of the submission
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Signature(s) of submitter(s) or agent of submitter(s)\*

Date

30/4/2022 -

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- via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Friday, 6 May 2022 7:09:34 pm

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## Submitter details

**First name:** Jacqueline  
**Last name:** O'Hagan  
**Address:** 53 Campbell Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0212090450  
**Email:** jacqueline.ohagan1@upcmail.ie

## Application details

**Applicant name:** Jacqueline O'Hagan  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I think the construction is too high, skews the surrounding skyline for neighbouring properties and is built much too close to existing property. It leaves little to no green space and dwarfs all houses around it. Concrete concrete concrete.  
More consideration should be given to fitting in with the existing space than merely capitalising on it as much as possible.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

Consideration for the surrounding houses who will be built out/dwarfed by the development (unnecessarily high in my opinion compared to height of surrounding development), lack of green space and overall density it will add to the area.

### The decision I / we would like Wellington City Council to make is:

Reduce the height by 2-3 stories and add more green space/trees around the area.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Saturday, 7 May 2022 11:40:55 am

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## Submitter details

**First name:** Francine  
**Last name:** Tyler  
**Address:** 26 Scapa Terrace  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 021473900  
**Email:** fran.tylernz@gmail.com

## Application details

**Applicant name:** Ryman  
**Site address:** 26 Donald Street  
**Service request number:** SR471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

The height of the development. The shade impact on the neighbours. The effects of increased wind on the neighbours due to the funneling of the wind through the apartment buildings. The stresses this will place on parking in the residential streets around the new development w during construction and after completion. Basically the whole development is too large and to high.

### Aspects of the application that you are neutral towards:

I m not opposed to a retirement village on the site, but it is too big as it is currently proposed.

### The reasons for my / our submission are:

I will be directly affected by the increased wind and will probably also lose sun during the winter time. My backyard outdoor area will become unpleasant to sit in, which will directly impact my quality of life. I will also likely be affected by losing the ability to park outside my own house, which after having lived near to Massey Uni in town, I do not wish to return to the situation when I am trapped in my house because if I leave I will not be able to find a park when I get home.

### The decision I / we would like Wellington City Council to make is:

I strongly urge the council to restrict the height of the apartments on the Campbell /Scapa terrace side of the development to two levels and prohibit construction of the apartments close to the rear and side fence lines of the properties on Scapa Terrace and Campbell Streets to a point when these will not shade any parts of their properties. I would also like the council to consider how the impacts of the funneling effects of the wind can be mitigated so residents are not impacted by this. This part of Karori is already subjected to very high winds and this development will only make this worse. I also ask that council insists that on site parking is provided for Ryman staff and visitors so on street parking

remains available for residents. I would also expect council imposes strict construction times on the development, which excludes construction work on weekends, and before 8am and after 5pm on week days.



## Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Notes for the applicant

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Wellington City Council  
PO Box 2199, 12 Manners Street, Wellington

### Submission details

Name of applicant:	<del>MARFANN HEALY</del> MITCHELL DAYSH ON BEHALF OF RYMAN HEALTHCARE LTD		
Site address:	26 DONALD ST AND 37 CAMPBELL ST, KARORI		
Proposal:	CONSTRUCTION, OPERATION & MAINTENANCE OF A RETIREMENT VILLAGE		
Service request number:	A71670		
	<input type="checkbox"/> Support the application	<input checked="" type="checkbox"/> Oppose the application	<input type="checkbox"/> Neutral

### Submitter details

Name of submitter:	MARFANN HEALY		
Address of submitter:	42 DONALD ST, KARORI		
Phone (day):		Mobile:	021 123 0841
Email:	MMHEALY6@GMAIL.COM		

### Submission statements (use additional pages if required)

The aspects of the application that I ~~support~~ oppose are:

I am concerned that the planned picnic area will be detrimental to my enjoyment of my property next door, ie. rubbish, noise etc. I would appreciate Ryman providing a high fence that is aesthetically appropriate and allows me to enjoy privacy and peace next door.

**The reasons for my submission are:**

To avoid a detrimental impact on ~~the~~ my enjoyment of life next door.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

To require byman to fund the construction of a suitably high wooden fence that provides privacy for me.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

*Nella Healy*

Date

*7-5-2022*

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# Submission on resource consent application

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: YEW MUN HO

Address of submitter: 5 RIDD CRESCENT, KARORI

Phone (day):

Mobile: 0220668806

Email: hoyhome@Ymail.com

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

- ① Revive business in Karori after the ~~dep~~ close of Victoria University campus.
- ② Ryman is a reputable retirement home operator bringing, well designed, quality buildings & landscape and add to ~~the~~ Karori's pleasant environment.
- ③ Providing an alternative & quality health and care service to residence within village.
- ④ More housing released to families in Wellington region by retirees.
- ⑤ The old campus grounds is an ideal location for a large village development and investment into Karori by a quality operator.

**The reasons for my submission are:**

- ① I desire to live in Karori in my retirement and not move away from my family & friends in Wellington.
- ② the retirement village is built on flat ground and near community services and Karori life.
- ③ Ryman offers & has a great reputation for all levels of care in community & service

**The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):**

- Approve Ryman's application and plans for the retirement village at this old site.
- Support many older and retired Karori residents wanting to still live in Karori and <sup>read</sup> a retirement village services.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

2 May 2022

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## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: MEL C. HO (MRS)

Address of submitter: 5 RIDG CRESCENT  
KARORI. WGTN 6012

Phone (day): 04 4764 825

Mobile: 021 386 410

Email: [howlhz@gmail.com](mailto:howlhz@gmail.com)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

- ① PROVIDES ASSURANCE TO ~~LOCAL~~ RESIDENTS THE SITE IS WELL USED BY SENIORS WHO ARE NOT A THREAT, IE LEAST NOISE ISSUES OR NEARBYNESS IN THE NEIGHBOURHOOD.
- ② REVITALISING THIS VALUED SITE & RELEASE PROPERTIES TO THE MARKET WHEN RESIDENTS MOVE INTO THE VILLAGES.

**The reasons for my submission are:**

- ① KEEN TO REMAIN IN KARORI FOR RETIREMENT AFTER 35 YEARS' STAY IN THE SUBURB.
- ② PROVISION OF HOSPITAL CARE TO ITS RESIDENTS
- ③ ABLE TO CONTINUE LOCAL CONNECTION & INVOLVEMENT IN LOCAL ACTIVITIES

**The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):**

ALLOW THE DEVELOPMENT TO PROCEED ASAP FOR THE SAKE OF AGEING POPULATION IN THIS SUBURB - WAITED MORE THAN 3 YEARS? FOR ITS PROGRESS.

**Note: \*Select one.**

request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

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- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*[Handwritten signature]*

Date

1.5.22

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**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: David Wallace Marshall

Address of submitter: 1 Lancaster Street, Karori, Wellington 6012

Phone (day): 04 476 7143.

Mobile: 0274 202 325

Email: [davidmar@xtra.co.nz](mailto:davidmar@xtra.co.nz)

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

1. Opportunity for Karori residents to remain in Karori rather than having to move to other suburbs or even out of Wellington.
2. Opportunities for employment in Karori - rather than so many residents having to travel outside the suburb for work
3. The freeing up of a considerable number of family homes by elderly couples or singles.
4. Ryman has a high reputation as a developer and administrator of retirement villages.
5. Long term care under 'one roof'
6. To make use of a valuable windfall site which has remained vacant for far too long.

**The reasons for my submission are:**

1. As elderly residents with health problems, our family are anxious to see us securely settled in a safe environment. We have become increasingly frustrated with the ongoing delays in any progress of this important project.
2. We have several friends who have moved into the BUPA development in Crofton Downs rather than wait for the Ryman development which was their preference.
3. We have three daughters and numerous grandchildren living in Karori and we definitely do not want to move out of Karori.

**The decision I/we would like Wellington City Council to make is**  
(include any conditions of consent you would like to see imposed):

To grant this consent as soon as possible - not just for our sakes but for those of numerous others we know.

**Note:** \*Select one.

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

*J. Marshall*

Date

*3 May 2022*

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy



# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application  Oppose the application  Neutral

## Submitter details

Name of submitter: Gabrielle Anne Marshall

Address of submitter: 1 Lancaster Rd, Karori, Wellington

Phone (day): 04 476 7143 Mobile: 021 297 2479

Email: davidmar@xtra.co.nz

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

1. Ryman has the reputation of providing a safe & caring environment for long term care in one facility
2. Allowing residents of the suburb the opportunity to remain in Karori as well as attracting employment within the suburb.
3. Close proximity & easy access to the library, medical facilities, supermarkets & community centre
4. Checking available a number of family homes occupied by elderly couples & singles.

The reasons for my submission are:

As a Karori resident with three families living in the suburb I wish to remain here.

With advancing years & declining health my husband and I wish to be settled in a Ryman facility

The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):

That this consent be granted and that construction be started as soon as possible

Note: \*Select one.

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

Oral submission at the hearing

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*Jack Ashell*

Date

*02/05/2022*

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- via email (please ensure you have provided your email address on page 1)
- via post, ie hardcopy

**From:** [David](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** RE: Submission for 26 Donald Street and 37 Campbell Street - SR471670  
**Date:** Tuesday, 10 May 2022 9:17:20 am

---

Thanks Krystle, yes I do want to speak to my submission but with my husband David Marshall, also of this address. Can we appear together please?

Many thanks,

Gabrielle M.

---

**From:** BUS: Consent Submissions [mailto:BUSConsentSubmissions@wcc.govt.nz]  
**Sent:** Monday, 9 May 2022 3:12 PM  
**To:** davidmar@xtra.co.nz  
**Subject:** Submission for 26 Donald Street and 37 Campbell Street - SR471670

Hi Gabrielle

Thank you for your submission to the public notification of 26 Donald Street and 37 Campbell Street, Karori.

You did not put a tick in the section on the form about making an oral submission in support of your written submission. Can you please advise if you do wish to speak or would prefer not to?

Kind regards

**Krystle Leen**

Business Support | Resource Consents | Wellington City Council

E [Krystle.Leen@wcc.govt.nz](mailto:Krystle.Leen@wcc.govt.nz) | W [Wellington.govt.nz](http://Wellington.govt.nz) |

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If you are not the intended recipient, you are asked to respect that confidentiality and not disclose, copy or make use of its contents.  
If received in error you are asked to destroy this email and contact the sender immediately. Your assistance is appreciated.



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Monday, 9 May 2022 7:23:55 pm

---

## Submitter details

**First name:** David  
**Last name:** Powell  
**Address:** 46 Donald St  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0272723378  
**Email:** celiney.davidp@gmail.com

## Application details

**Applicant name:** Ryman  
**Site address:** 26 Donald St, Karori, Wellington  
**Service request number:** SR471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

We oppose the development height and the consequential shade impact on the neighbours. The apartment buildings will likely increase wind funnelling for the neighbours. Our residential streets will experience increased stress on parking around the new development during construction and after completion, creating dangers for children attending childcare and schools in the area. The development is too high and large for this residential area.

### Aspects of the application that you are neutral towards:

We support the development of a retirement village, but its proposed scale is too large and high for the area.

### The reasons for my / our submission are:

We will be directly impacted by the shade from the buildings due to their height. This will increase our heating costs in winter, as the heat from the sun will disappear. We are concerned with the increased stresses on parking and traffic, and the potential dangers in what is an otherwise child friendly area. We're also concerned that infrastructure, such as storm and wastewater, will be adequately managed to cope with increased demand.

### The decision I / we would like Wellington City Council to make is:

We strongly urge the council to decrease the height of the buildings to eliminate the significant shading impact on neighbours, particularly on Scapa terrace side of the development. We want the council to ensure Ryman's provides sufficient off street parking for staff, residents, and visitors. Council should also look to ensure the safety of pedestrians, particularly children, as a result of increased traffic. We also request the council look into how wind impact from funnelling can be reduced. We expect the council is satisfied that waste and stormwater pressures won't impact neighbouring properties. We expect council to impose strict construction times, which would exclude construction work on weekends, and before 8am and after 5pm on week days.

# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter:

Address of submitter:

MRS. CHERYL HARRISON

Phone (day): 04 972 2116

Mobile: 0212689377

Email: [cherylharrisonwght@gmail.com](mailto:cherylharrisonwght@gmail.com)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

I support the retirement village in the Karori Suburb as it close to all amenities and excellent transport to the city.

**The reasons for my submission are:**

Consideration of future residence  
on personal front

**The decision I/we would like Wellington City Council to make is**  
(include any conditions of consent you would like to see imposed):

Allow this village to be built  
and up and running in a quick &  
responsible manner

**Note:** \*Select one.

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  
 I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*B. A. Harrison.*

Date

*01-05-2022*

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# Submission on resource consent application

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Me Heke Ki Pōneke

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**Resource Consents**  
Wellington City Council  
PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application  Oppose the application  Neutral

## Submitter details

Name of submitter: John SARFATI

Address of submitter: 275 KARORI Rd  
Wellington 6012

Phone (day): 04 476 9392

Mobile: —

Email: JLSARFATI@GMAIL.COM

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

Retirement Village by Ryman Healthcare Ltd  
26 Donald St & 37 Campbell St  
KARORI

**The reasons for my submission are:**

The area has been under utilised for years

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

To consent the development of the Retirement Village

Conflict of interest - I have booked residence there

**Note: \*Select one.**

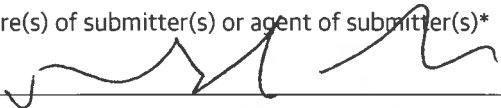
I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  
 I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*



Date

May 6 2022

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**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Tuesday, 10 May 2022 10:37:48 am

---

## Submitter details

**First name:** Sandra  
**Last name:** Waldrom  
**Address:** 31 Donald Street, Karori  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 044766808  
**Email:** sandra.waldrom@gmail.com

## Application details

**Applicant name:** Mitchell Daysh Ltd on behalf of Ryman Healthcare Ltd  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

We object to the conclusions made regarding

- The level of traffic that will be generated by the Proposed Village
- The surrounding road network can accommodate the expected development traffic with minimal effect on the efficiency of the network and will not compromise traffic safety in the area
- While the proposed parking provision is less than the District Plan requirement, the proposed parking provision is expected to cater for the parking demand generated by the Proposed Village. No parking overspill is expected
- The loading provisions are provided on-site and considered appropriate to cater for loading requirements of the Proposed Village
- The access provision does not meet the District Plan standard in term of number of access points or width. The provision of two access points are considered appropriate for the intended use of the Site and are not expected to lead to any safety or efficiency issues. The design of the Donald Street access is not expected to adversely affect pedestrians
- It is appropriate to manage the temporary construction traffic through a Construction Management Plan to suitably avoid or mitigate the temporary adverse effects that may arise from construction activities. As such, a Construction Traffic Management Plan should be required as a condition of consent. Overall, it is concluded that there is no traffic engineering or transport planning reason that would preclude the construction and operation of the Proposed Village on the Site as intended.

### Aspects of the application that you are neutral towards:

#### The reasons for my / our submission are:

We are immediately affected by the proposed:

LOADING AND SERVICING The Proposed Village includes one main loading bay

outside Building B01 on the same side of the building as the main village entrance. Ryman Healthcare Retirement Village, Karori Transportation Assessment Report Page 26  
This loading area can accommodate the turning of a 9.2m rigid truck (as specified by the waste management contractor). Appendix B shows the tracking path of a 9.2m truck using the proposed loading space. The internal road layout is also able to support emergency vehicles such as ambulances and fire engines.  
Thus unlike an academic campus there will be activity on this Retirement Village site 24 / 7.

**The decision I / we would like Wellington City Council to make is:**

Limits placed on the hours of operation for supplier delivery and removal to site, plus consideration during construction for the movement of vehicles when school children are accessing / egressing from swimming pool / school and creche drop-off / pick-up. These are not "peak" hours necessarily. Nor are the staff movements in "peak" commuting times as stated in the report so there will be pressure of road and parking. There appears no comment on movement of mobility scooters - do they use the road or footpath? Nor does the transport report take into account the movement of children from Karori Normal School to Ben Burn Park.

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant:

Ryman Healthcare Ltd

Site address:

26 Donald St & 37 Campbell St

Proposal:

to establish a retirement village on site

Service request number:

SR 471670

Support the application

Oppose the application

Neutral

## Submitter details

Name of submitter:

Denis Stoops

Address of submitter:

13 Rochester St Winton 6012

Phone (day):

04 9779674

Mobile:

Email:

denis.stoops@gmail.com

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

Ideal location for a retirement village. An excellent use of the site.

**The reasons for my submission are:**

Karori is one of WCs largest suburbs and needs a facility such as this, It is well situated for shopping and other facilities, and services

**The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):**

approve the application

**Note: \*Select one.**

I request/ do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

I/we wish to speak in support of the submission

do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

Dennis Storm

Date

11 May 2022

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**Resource Consents**  
Wellington City Council  
PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant:	Ryman Healthcare Limited		
Site address:	26 Donald ST and 37 Campbell ST		
Proposal:	To establish a comprehensive care retirement Village on site		
Service request number:	SR471670		
	<input checked="" type="checkbox"/> Support the application	<input type="checkbox"/> Oppose the application	<input type="checkbox"/> Neutral

## Submitter details

Name of submitter:	Noeline Stoops		
Address of submitter:	13 Rochester ST Wilton 6012		
Phone (day):	04 977 9674	Mobile:	027 315 4762
Email:	noelinstoops@gmail.com		

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

I support the plans the applicant have produced for the site. It is an appropriate and excellent use of the site.

**The reasons for my submission are:**

Quality accommodation for the ageing population is best provided in the community they have previously lived in; Karori is a large suburb and this is a much needed facility. It will result in freeing up existing houses to help the housing shortage. The plans take into consideration the needs of existing neighbours to the site

**The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):**

approve the application.

**Note: \*Select one.**

I request/ do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*M. Stoop*

Date

11-5-22

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**Privacy information**

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**How do you wish to be served with any correspondence**

via email (please ensure you have provided your email address on page 1)

via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Wednesday, 11 May 2022 3:44:38 pm

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## Submitter details

**First name:** Judy  
**Last name:** Elliott  
**Address:** 23 Donald Street  
**Suburb:** Karori, Wellington  
**City:** Karori, Wellington  
**Phone:** 0272949808  
**Email:** judy.elliott@waterfront.org.nz

## Application details

**Applicant name:** Mitchell Daysh on behalf of Ryman Healthcare Ltd  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I support the location as it is handy to all amenities  
A retirement village will "free up" housing in Karori - there are many older people living in large homes which could be sold to younger families  
Karori needs a retirement village; there are few facilities for the elderly in Karori which is a large suburb  
Improved landscaping and building from a now partly demolished and wrecked site  
Need plenty of parking spaces in the Village - Donald Street is a very busy street

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

I live close by the proposed retirement village. In the past few years the site has been empty; it has been vandalised, is overgrown, has barbed wire surrounding it, most remaining windows are broken and are boarded up. The sooner this consent is granted and the building has started the better.

### The decision I / we would like Wellington City Council to make is:

To grant the resource consent as soon as possible and allow work to begin.

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Angela WERREN

Address of submitter:  
27 Standen Street  
Karori  
Wellington 6012

Phone (day): 04 476 6963

Mobile: 021 258 8596

Email: [pachyderm@werren.nz](mailto:pachyderm@werren.nz)

## Submission statements (use additional pages if required)

The aspects of the application that I support/~~oppose~~ are:

1. The location is ideal from my point of view. It is a short walk from the shops and library, and handy to bus routes.
2. I have visited other Ryman villages and always been impressed by the design, the quality of the build, the care of the grounds, and the facilities available, plus the activities offered. The proposed village has all the features I consider desirable, including the levels of care (e.g. hospital, dementia) that are a must in this day and age. In providing these within the village Ryman are relieving pressure on the public health system.
3. The interest from the community in this development is said to be strong, which should lead eventually to a large number of residential properties becoming available for purchase, thus relieving pressure on the housing market also.
4. Karori is a large suburb and needs this kind of development. Existing provision for aged care, while no doubt of high quality, is very limited. Those wanting to move into a village of this nature must currently look further afield and that means moving away from Karori, which is presumably not a desirable option for many, and certainly not for me.
5. The development, in both its construction and its finished stages, will provide work opportunities for those suitably qualified.



**The reasons for my submission are:**

I have been invited by Ryman to contribute.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

To grant the consent.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*Angela H. Newman*

Date

11 May 2022

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# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents**  
**Wellington City Council**  
**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: **Rymans Healthcare**

Site address: **37 Campbell St 29 Donald St**

Proposal: **To establish care and retirement village**

Service request number: **SR471670**

Support the application

Oppose the application

Neutral

## Submitter details

Name of submitter: **Jennifer Rutledge**

Address of submitter:  
**11 Farm Road, Wellington 6012**

Phone (day): **04 4747778**

Mobile: **0212132151**

Email: **Jennyrutledge@hotmail.com**

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

Rymans is a respected responsible provider of retirement villages. All their villages i have seen have been attractive buildings with beautifully kept grounds. It will be a visual asset.

When people move to the villages, their homes are then available for families. There is a shortage of housing.

Having all the new residents in Karori will give the place a much needed shot in the arm.

It is a centrally located village so the elderly are not stranded in the boondocks which is a drawback of some other retirement places. Buses, shops easily accessible.

**The reasons for my submission are:**

I would very much like to retire in karori as it is my stamping ground. After some research, i have concluded that rymans is my best option. It provides all levels of care which i might need down the track.

I still enjoy going out and about and the Karori bus runs every 10 minutes. My grandchildren will be able to visit easily.

Supermarkets and mall within walking distance.

I have friends living in Karori.

Friends living in other Rymans villages are all very happy with them.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

I would like the Council to grant consent for the Rymans village to go ahead as soon as possible

**Note: \*Select one.**

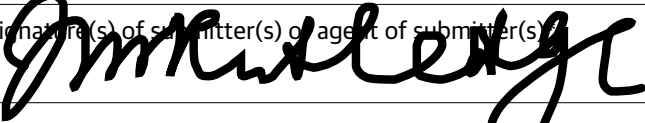
I request/ do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

I/we wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)  


Date  
9 May 2022

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via email (please ensure you have provided your email address on page 1)

via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Thursday, 12 May 2022 4:23:24 pm

---

## Submitter details

**First name:** Janet  
**Last name:** Hercus  
**Address:** 25 Donald St  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0272436123  
**Email:** [jbhercus@xtra.co.nz](mailto:jbhercus@xtra.co.nz)

## Application details

**Applicant name:** Mitchell Daysh  
**Site address:** 26 Donald St., Karori, Wellington  
**Service request number:** 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

Karori needs more quality retirement facilities.  
It will reduce the pressure on the housing market when older local house owners sell and relocate to the retirement village.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

The site and remaining buildings are deteriorating while submissions are being delayed. Boards cover windows and doors, barbed wire on top of fences. Vandals have smashed doors and windows. some positive and prompt action is needed.

### The decision I / we would like Wellington City Council to make is:

Car parks provided in the retirement village as Donald St car parks are at a premium.  
Height restrictions to the buildings.

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: KARORI RESIDENTS ASSOCIATION

Address of submitter: C/- ANDREA SKEWS, 27 BULLER STREET, TE ARO

Phone (day):

Mobile:

0220735548

Email: [chair@karoriassociation.nz](mailto:chair@karoriassociation.nz)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

KRA feel that the former Teachers College is an ideal location for a retirement village due to the location to both the Karori village and public transport.

Ryman Healthcare has a reputation for providing high quality building materials and design.

The village will give elderly community residents the opportunity to stay in their community and access a range of care.

There is a need for all levels of care in the community including rest home, hospital, dementia and serviced care.

Ryman are already investing in the local economy by supporting local organisations and projects.

Karori needs critical healthcare infrastructure, and this will also provide construction jobs and a range of other jobs when the villages are operational.

This build will also relieve pressure on the public health system by providing care within the village.

Having a local retirement village relieves pressure on the housing market as residents sell their family homes when moving into the village, thus freeing up housing for the younger generations.

It is still imperative for Ryman and Council to ensure local neighbours and the area are impacted as little as possible regarding effects to the environment and recession and light planes.

**The reasons for my submission are:**

KRA have had a lot of feedback from the community, especially the elderly who wish to stay within their community and environment but need increasing levels of support and care.  
The location has been deserted for long enough and security and vandalism are of major concern to neighbours.  
It is time to get this project moving.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

To support the retirement village build and expedite building and construction to start immediately.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

12/05/2022

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- via post, ie hardcopy

## Krystle Leen

---

**From:** Karori Residents Association <andreaskews.kra@gmail.com>  
**Sent:** Friday, 13 May 2022 4:03 pm  
**To:** BUS: Consent Submissions  
**Subject:** Re: Submission for 26 Donald Street and 37 Campbell Street - SR471670

Thanks for checking, we do not wish to speak.

Ngā mihi  
**Andrea Skews**  
Chairperson  
Karori Resident's Association  
+64220735548

**Andrea Skews**  
Chair, Karori Residents Association.

PO Box 563, Wellington 6140.  
E [chair@karoriassociation.nz](mailto:chair@karoriassociation.nz)  
P 04 473 5548 M 022 073 5548



On Fri, 13 May 2022 at 15:49, BUS: Consent Submissions <[BUSConsentSubmissions@wcc.govt.nz](mailto:BUSConsentSubmissions@wcc.govt.nz)> wrote:

Hi Andrea

Thank you for your submission to the public notification of 26 Donald Street and 37 Campbell Street, Karori on behalf of the Karori Residents Association.

You did not put a tick in the section on the form about making an oral submission in support of your written submission. Can you please advise if you do wish to speak or would prefer not to?

Kind regards

# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

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**Resource Consents**  
**Wellington City Council**  
**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare

Site address: 26 Donald St and 37 Campbell St

Proposal: Retirement Village

Service request number: SR 472670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Roger E Lane

Address of submitter: 11 Rutland Way, Wadestown, Wellington 6012

Phone (day): 04 4727240

Mobile: N A

Email: [randhlanes@xtra.co.nz](mailto:randhlanes@xtra.co.nz)

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

That the current Ryman proposal will be an excellent use of this site, and will add a valuable asset to the existing wider Karori community.



**The reasons for my submission are:**

See the attached paper.

**The decision I/we would like Wellington City Council to make is**  
*(include any conditions of consent you would like to see imposed):*

Approve the Resource Consent application without delay.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

2nd May 2022

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SR 471670

Submission Relating to the Resource Consent for:

**Proposed Ryman Village**

**26 Donald St and 37 Campbell St, Karori**

I forward, for the information of the Resource Consent Hearing Commissioners, the following material in support of the development proposed by Ryman Healthcare on the former Training College site bounded by Donald St and Campbell St, Karori.

I am firmly of the opinion that the current Ryman proposal will be an excellent use of this site and it will add a valuable asset to the existing wider Karori community. My principal points are:

- 1/ The physical suitability of the site for the proposed use is obvious. The size of 3 hectares allows for the range of accommodation and services that creates a successful retirement village, while still nestling into the overall suburb of Karori. The proximity to bus routes, (the Gold Card will ensure off peak usage), supermarkets, library, café, medical rooms, dentist, churches, and a range of small retailers is extraordinary. Further, the immediate proximity to the suburb's largest primary school gives the opportunity for young and old to mix. A known benefit to each of those groups.
- 2/ No other development option for this site makes as much sense.
  - The "do nothing" option, (and I have heard some Karori residents advocate this), would require purchase of the site by the WCC for a sum of approximately \$28m. The obvious consequence of that must be a huge increase to the already rapidly increasing rates we are paying. The cost to ratepayers for a few tennis and netball courts and some open space would be impossible to justify. What would the ugly "brutalistic style" buildings be used for? How long before the graffiti would cover them?
  - A standard residential development is the obvious alternative but would add significantly more stress to traffic, water supply and sewage loadings than the Ryman proposal. (I raise this aspect again below.) No doubt the visual limits would be stretched to the limit by such a development.
  - A lovely new shopping mall, in lieu of the current site restricted facility, would no doubt be welcomed by some residents, (including many from adjacent suburbs), but the traffic consequences would be horrific! Mall buildings would comprise multi story slab walls without visual window relief, and multi storied car parking buildings. Such buildings are what shopping malls universally deliver.
  - What about an industrial development? Yes, I am joking! This cannot be an option!

3/ One significant benefit resulting from the Ryman development will be the releasing of many badly needed 3 and 4 bedroom homes elsewhere for family use. (I assume that most potential residents will fund their entry to this village by selling a larger home. The blunt truth is that the sale of a "small flat" or "pensioner unit" would not provide the necessary funding for entry to a Ryman Village unit.)

4/ This development offers residential intensification, (a known WCC objective), but without significant, or adverse, visual effects to the residential nature of the suburb of Karori. Also, (see the following paragraph), the proposed use has a lesser impact on the demand for public services than if the site were developed for normal residential accommodation. The Mcindoe Urban Report appropriately describes the site as a "Windfall Site".

5/ The report by Plumbing Design and Consultancy (NZ) Ltd notes that "Water usage demand is significantly lower than for a standard residential development." (60% less for a retirement village unit than for a typical residential house.) Although I saw no documentation, this lower water use will result in lower sewage generation than for equivalent standard residential use. This is significant in the context of a sewage treatment plant (South Karori Rd) that has limited capacity.

Accordingly, this development will put less strain on limited public service networks than other realistic potential use of the site.

6/ The development proposed is a particularly appropriate use of the site in respect of vehicular traffic. Comute Transportation Consultants advise that the level of traffic generated from the proposed site use is significantly less than the previous use, and less than peak hour traffic from a normal residential development of this site.

Mr Spence's peer review notes that there are 5 bus services close to the site, and that the site is well located to provide travel options for staff who don't have a car. I also note from his report that more on-site parking is to be provided than the relevant standard demands. I conclude that this eliminates, or certainly reduces the parking generated by the development on adjacent streets.

We are also advised that staff shifts avoid peak traffic periods.

7/ A known benefit of modern retirement villages, such as this proposal, is the provision of care and security to the residents. In this sense the proposal being considered will be a real asset to the Karori community. This is of benefit not only to the residents, but also to their families, knowing that their loved ones are in a good, safe, place.

Finally I note that: I have focussed above on my assessments of the benefits that the proposed Ryman development will bring to the Karori community. I believe that there are many other personal benefits to the residents, but I will not detail those here because they are apparent from the readily available Ryman brochures. Such benefits will be available to those who choose to take up the opportunity of retirement village living in Karori.

Roger Lane



# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

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### Resource Consents

**Wellington City Council**

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Sandra Fitzgibbon

Address of submitter: Apt 618/134 Burma Rd, J'ville (Malvina Major)

Phone (day): 04 476 234

Mobile:

Email:

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

The new Ryman designs show a village complex well in keeping with the residential streets surrounding it. Ryman's maintain their buildings to a high standard so the suburb of Karori can be assured of a large but meticulously kept attractive addition to their local housing within a well-established, park-like garden.

I can personally vouch for all of the above as I have now resided at Malvina Major as an independent resident for almost a year now.

I am one of many here who have released a family home onto the market for a new buyer - a market that so badly needs this type of housing so that new, would-be, residents can be enticed & accommodated

**The reasons for my submission are:**

We lived in Karori for 45 years - we clearly wanted to stay there & thus, we would have been some of the first to enrol on the Karori Village waiting list over 3 years ago. We were bitterly disappointed by the seemingly endless knock-backs the village proposal attracted and in the end moved to Malvina Major where we are very grateful to be.

**The decision I/we would like Wellington City Council to make is**  
(include any conditions of consent you would like to see imposed):

To acknowledge that a retirement village, attractive, well-built, well-kept & welcoming to the wider community will be a huge plus for the Karori suburb and the under-used, faltering retail businesses. Malvina Major provides just such an image, just such a result out here in Johnsonville.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

R. A. Fitzgibbon

Date

6/5/22

**Note:**

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**Privacy information**

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified resource consent process. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

Use this form to make a submission on a resource consent application you support or oppose. You can also make a submission online, visit [wellington.govt.nz/have-your-say/public-notice](http://wellington.govt.nz/have-your-say/public-notice).

If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant:	Ryman Healthcare Limited		
Site address:	26 Donald Street and 37 Campbell Street, Karori		
Proposal:	To establish a comprehensive care retirement village on the site.		
Service request number:	SR471670		
	<input checked="" type="checkbox"/> Support the application	<input type="checkbox"/> Oppose the application	<input type="checkbox"/> Neutral

## Submitter details

Name of submitter:	S C Evans		
Address of submitter:	3/229 Karori Road, Karori, Wellington 6012		
Phone (day):		Mobile:	
Email:	<a href="mailto:silvanacaradocevans@gmail.com">silvanacaradocevans@gmail.com</a>		

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

The former teachers' training college site is an ideal location for a retirement village allowing good access to centre of Karori and all it's facilities and public transport.

The plans are for well designed high quality buildings and landscaping with lots of trees and shrubs to be added to the site and some existing gardens and trees are to be retained, I believe.

In addition pressure on the housing system will be alleviated and homes released onto the market when residents move to the village.

**The reasons for my submission are:**

I support this new development because I would like to continue living in Karori and move to the retirement village where I believe I can retain my independence and be looked after in the same place if I am not able to manage independent living and longer.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

**Note:**

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)
- via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Friday, 13 May 2022 1:50:09 pm

---

## Submitter details

**First name:** Mary Miria  
**Last name:** Finny  
**Address:** 34 Campbell Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 4766198  
**Email:** miriafinny@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Ltd  
**Site address:** 26 Donald Street & 37 Campbell Street  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I oppose the application because of its actual and potential effects on:

The Stormwater network;

The Sewerage network.;

On the natural stream that flows through the site

Traffic during construction; and

Parking, both during construction and once operating.

Should these issues be suitably and robustly addressed within consent conditions then I may be neutral on the application

### Aspects of the application that you are neutral towards:

The need for additional Aged Care Facilities.

### The reasons for my / our submission are:

As a long-term resident of Campbell Street, I am well aware of, and have been affected by, the existing issues identified above. The proposed development will potentially exacerbate each of these issues and the 'costs' of the development will be passed to the existing local residents and the Wellington ratepayers generally.

### The decision I / we would like Wellington City Council to make is:

I request that WCC impose a number of conditions on any resource consent that might be granted. These conditions must be unambiguous, quantifiable and enforceable. WCC must undertake that there will be a high level of monitoring and enforcement of these conditions.

Specific conditions should include:

Capture, attenuation and treatment of all stormwater from the site, above that which occurs at present, for all events up to the 1% AEP rainfall increased to allow for the potential



effects of climate change. Any stormwater that cannot be managed as above, should be subject to a levy sufficient to provide the necessary upgrades of the existing stormwater system from the development site at Campbell Street to Karori Stream below the limit of any existing develop. The condition must ensure that any costs of additional stormwater discharge and infrastructure are not borne by the community and ratepayers.

The development should be subject to a levy sufficient to provide the necessary upgrades of the wastewater system to accommodate the increase in discharge above the current level, from the development site and through the treatment plant at Karori Stream. The condition must ensure that all costs of additional wastewater discharge are not borne by the community and ratepayers.

The project should ensure the maintenance of water quality and improved habitat within the natural stream that flows through the site. Any pipes and other structures in and over the stream within the development site should be daylighted to improve the aquatic habitat. Planting of the riparian margins, for a distance of at least 5m on either bank, with native species endemic to Karori should be required.

All construction traffic should use only the Donald Street entrance and avoid both the start and finish of the school day.

No construction traffic should be allowed to access the site from Campbell Street.

During construction there should be no parking of construction workers on Campbell Street or its various side streets.

Once any facility is in operation, residents, staff and visitors should be prevented from parking on Campbell Street.

WCC should require a development levy to cover all actual and potential costs associated with the proposed development. This levy should be payable following the grant of any resource consent and prior to the commencement of any works.

WCC should also require a bond from the developer sufficient to cover any costs resulting either directly or indirectly from the proposed development. This bond should be refundable after a minimum period of 10-years.

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Helen MEO

Address of submitter: 6 SCORIAN CLOSE, KARORI

Phone (day):      Mobile: 021 663 485

Email: meo.helen@gmail.com

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

**The reasons for my submission are:**

Karori, & Wellington city, have an aging population but fewer best homes/retirement villages than other cities in NZ.  
Karori & specifically the former Teachers College would make an ideal retirement village; relatively flat access, close to Karori mall, a reliable bus service & Wellington city.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  
 I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)* <i>HA Meo</i>	Date <i>4 May 2022</i>
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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
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- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Saturday, 14 May 2022 8:22:28 am

---

## Submitter details

**First name:** Barbara  
**Last name:** Carruthers  
**Address:** 14 Scapa Terrace  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 0211031694  
**Email:** bcarruthers@outlook.co.nz

## Application details

**Applicant name:** Barbara Carruthers  
**Site address:** 26 Donald St  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

**Aspects of the application that you support or oppose:**  
Increased shade on our property, impact on our privacy, traffic/parking problems, construction noise/dust and traffic issues.

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**  
Problems associated with above. The proposed complex is too large and any benefits for Rymans will be at the expense of the wider community

**The decision I / we would like Wellington City Council to make is:**  
Limitations on size

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Saturday, 14 May 2022 4:18:02 pm

---

## Submitter details

**First name:** John  
**Last name:** McArdle  
**Address:** 15 Scapa Terrace, Karori  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 0277533214  
**Email:** john.mcardle65@gmail.com

## Application details

**Applicant name:** Ryman  
**Site address:** 26 Donald Sreet  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:** One hour.  
**If others make a similar submission:** I / we will consider presenting a joint case with them at the hearing

### Aspects of the application that you support or oppose:

I oppose the following aspects of the Ryman proposal:

- the complete disregard for the building height limits in the district plan;
- the increased danger and traffic during the construction phase, especially for the many primary and pre-school children pedestrians in the nearby area;
- added pressure on Karori's current poor stormwater and sewage infrastructure;
- increased shading on neighbours and future Ryman residents given the proposal for six or seven storey buildings;
- impact on nearby residents from construction noise, dust and traffic during the lengthy construction period.

### Aspects of the application that you are neutral towards:

The bowling green, especially if it is open to members of the public.

### The reasons for my / our submission are:

As a long time Karori resident, I am concerned about the many negative impacts for our community by a property developer on what was once public land.

Ryman has no real interest in the best outcomes for the Karori community.

Ryman is one of Australasia's largest property developers and as a sharemarket listed entity its dominant objective is to maximise shareholder wealth.

Ryman has a history of paying no corporate income tax in New Zealand and basically is in the business of farming elderly people.

<https://www.nzherald.co.nz/business/3629m-pre-tax-profit-zero-tax-paid-ryman-healthcare-annual-report-out/77DMEJ5N5U7DNOSTKY54T4FTHQ/>

Its business model means the quicker its residents die the more profit it makes, hence the minimum age for prospective residents.

**The decision I / we would like Wellington City Council to make is:**

Ensure that the development complies with the district plan building height limit.

Conditions limit the number of residents, and hence the amount of sewage and wastewater discharge from the site, so the development does not increase the pressure on the current infrastructure.

Limit the scale of the development so that the construction period is as short as possible and the development is compatible with a residential area.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Sunday, 15 May 2022 10:25:07 am

---

## Submitter details

**First name:** sarah  
**Last name:** minson  
**Address:** 5 scapa tce  
**Suburb:** Karori  
**City:** wellington  
**Phone:** 0292008250  
**Email:** sarahlouiseminson@gmail.com

## Application details

**Applicant name:** ryman health  
**Site address:** 26 donald St  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

We oppose the development height and the consequential shade impact that this will have on all neighbouring properties - and not just those on the immediate boundary.

The council needs to provide assurance that this will not increase wind funnelling for the surrounding area.

There is significantly insufficient car parking provided on site for visitors, residents, staff and contractors. Our residential streets will experience increased stress on parking. This will mean that we cannot park outside our own houses - this impacts our daily lives as visitors and trade people cannot park near our house.

The development is too high and large for this residential area.

### Aspects of the application that you are neutral towards:

we are happy that a retirement village is being built.

### The reasons for my / our submission are:

We are concerned about the size of this new construction. The height as previously noted is too high. We will be directly impacted by this due to shading. We believe the height should be reduced.

The local infrastructure needs to be improved prior to this new residential facility. Karori already has significant issues with storm water drainage, sewerage and water run off. We live in Scapa Tce and in 2021 our house was severely flooded (inside) 3 times due to the council storm water not being able to handle the capacity.

**The decision I / we would like Wellington City Council to make is:**

We strongly urge the council to decrease the height of the buildings to eliminate the significant shading impact on surrounding properties, particularly on Scapa terrace side of the development. We want the council to ensure Ryman's provides a lot more off street parking for staff, residents, and visitors.

We request that the council confirm that they are confident that waste and stormwater pressures won't impact neighbouring properties and that there is no increase in wind funneling. We expect council to impose strict construction times, which would exclude construction work on weekends, and before 8am and after 5pm on week days.

Council need to ensure the roads are safe due to the large increase in traffic both during construction and during operation of the rest home.

We would like the council to ensure the distance between the buildings and those houses on scapa terrace does not result in a decrease in value of those properties, nor make living there unpleasant. This includes the height of those buildings along the scapa tee perimeter. i would like the council to impose green space requirements including planting of trees and not cutting down large existing trees.



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Sunday, 15 May 2022 10:44:44 am

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## Submitter details

**First name:** Nikki  
**Last name:** Fraser  
**Address:** 19A Campbell Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 4765766  
**Email:** nikkifraser.nz@gmail.com

## Application details

**Applicant name:** Rymans Healthcare Ltd  
**Site address:** 26 Donald and 37 Campbell Streets, Karori  
**Service request number:** 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

- \*building noise was considerable during demolition - plus radios blaring with no consideration to those of us living in this very tricky valley - acoustics are strange here and noises become intense and they echo, as result - many private conversations of builders up buildings were clearly heard
- \*building hours not being adhered to, as was a very regular issue during demolition - constantly working loudly outside agreed working hours
- \* broken promise by Rymans to maintain the wonderful native gardens over Teachers' College - no care for years now - it is ruined - rodents are an increased problem around here now
- \*Karori Stream running through the site have a visible rodent problem - WCC failing to do anything about that and for close residents, it is a big issue
- \*serious impact on birdlife which was abundant here and now sadly lacking - their habitat gone and rodents increased
- \*serious concern then about the gardens they will plant - begonias and plants as per Rymans usual in all their gardens - not conducive to returning the garden to a native haven for our local native birds - would also provide sound protection for residents
- \*Increased shading on my property close by with planned tower block higher than last which affected my sun three months of the year
- \*Lack of parking now - adequate onsite parking for staff and visitors needed
- \*Parking expectations of construction staff - please park onsite - not on our cluttered streets
- \*Very worried about the Tower Block replacement and the height that this will become - concerned about an increase in height
- \*concerned about placement of air conditioning units and laundry noises on site -
- \*Lack of green spaces - every Rymans I visit (have had partner in one for two years) lacks green space for residents to walk - sad for Karori to lose green spaces as we are for this site.

\*Lighting at night - Karori Normal School has floodlights that thoughtlessly light up one end of my house - please no Rymans floodlights!

**Aspects of the application that you are neutral towards:**

Pluses - character - the look of the lower apartments looks great - much better than most Rymans' boxes

Done well, this could contribute well to the area - unlike say Huntleigh which is an architectural eyesore

**The reasons for my / our submission are:**

This is very close to my house - this Rymans build will not contribute to me positively nor any of the residents around me = people and feathered residents.

Hopefully the Council will ensure that residents are listened to and that Rymans and builders follow the guidelines set out for them.

**The decision I / we would like Wellington City Council to make is:**

\*environmental

- gardens, stream, vermin - putting in the native gardens that was so fantastic and  
-not lighting up the area once built but sitting quietly into the valley - noiselessly - no fans, air conditioning, laundry etc

\*construction pollution - noise, hours - strict adherence to those for residents' wellbeing

\*parking during construction, and once built - troublesome now down Campbell street - very difficult getting out of my driveway and all along my street. Vision severely challenged as so many large vehicles parked on road now let alone when construction begins.. Perhaps Rymans construction parking ALL on site?

\*that WCC is available to promptly attend to issues for residents - noise issues, working hours, blocking our streets and driveways during construction

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Sunday, 15 May 2022 12:12:56 pm

---

## Submitter details

**First name:** David  
**Last name:** Butcher  
**Address:** 6 Horopito Road  
**Suburb:** Waikanae  
**City:** Kapiti Coast  
**Phone:** 049020290  
**Email:** trisha.davidbutcher@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I am a former resident of Karori and have considered moving back there. The Ryman village would add a significant addition to the living opportunities in the suburb and at the same time release housing for general use. The village's comprehensive care provision also eases pressure on local care providers.

### Aspects of the application that you are neutral towards:

None

### The reasons for my / our submission are:

See above

### The decision I / we would like Wellington City Council to make is:

Approve the application.

15 May 2022

## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

### Submitter Details

Name of submitter: Jude Wallace  
Address of submitter: 13 Scapa Terrace  
Mobile: 027 4290029  
Email: judeandsimon@outlook.com

## INTRODUCTION

As a local Karori resident, I am not opposed to the development of a retirement village in the suburb as there is demand from an ageing population. However, what is of real concern to me and other people in Karori is the sheer scale of what is being proposed by Ryman Healthcare, the impact this will have on already 'creaking' infrastructure and affects for adjacent properties. I am also disappointed at the loss of recreation areas and facilities, a point I want to address first.

### Loss of recreation areas and facilities

The sale of the former Teachers' College site to Ryman Healthcare at the end of 2018 is gradually seeing important recreation spaces for the local community disappear. The tennis and netball courts have not been in use for more than two years and if the Ryman consent is successful, the much-used cricket nets and park for dog exercising will also go.

The loss of the cricket nets will be a blow to the community, and it was disappointing that despite my efforts and those of others, the WCC was not prepared to consider relocation to Ben Burn Park or another site in the suburb. This leaves Karori, New Zealand's largest suburb, with just three cricket nets available for use at Karori Park.

Overall, the loss of green space has not been compensated for by either the WCC or Ryman Healthcare and will instead be replaced by growing intensification. It is a pity more effort could not have been made, collaborating with the community, to replace recreation areas and facilities that have been lost.

## Infrastructure

While Wellington is not alone in having to grapple with infrastructure challenges, Karori's challenges are greater with real pressure on water assets. In the Council's recent update to its District Plan, the suburb's zoning and height limits were left unchanged - height limits remained at 8m whereas they have increased in every other Wellington suburb because the WCC deemed the Karori could not sustain high levels of intensification.

The proposed site between Donald and Campbell Streets is expected to accommodate more than 400 residents and this will have a significant impact on already constrained infrastructure, especially water assets. I am concerned the consent application by Ryman Healthcare does not address the water issues and appears to rely on old, incomplete, or insufficient data based on its experience from previous sites.

Before proceeding, it is incumbent on both Ryman Healthcare and the WCC to evidence the mitigation strategies they have in place to address the demands on infrastructure, especially water. Given the site was once a flood plain, failure in this area could be catastrophic for all residents of Kaori not to mention the 400 people that will be living in the village itself.

## Carparking and traffic

As a resident who lives close to the proposed new development, I have taken a particular interest in car parking and traffic issues, which I think have been 'glossed over' in Ryman Healthcare's resource application to the WCC. I have studied the application carefully and of the 39 parks that are available to staff and visitors, 3 are reserved for accessible parking and 2 for the village vans, leaving 34 for staff and visitors. The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. Assuming this is the case, this leaves just 9 carparks available for visitors to the site, completely inadequate for a village of this size.

The streets all around the area will become congested with cars from Ryman Healthcare visitors and staff. Visitors will increase in number at weekends while at the same time Ben Burn Park has many sport activities and the carparking spaces are at a premium. The weekend will see increased demand for parking between residents and village visitors. My own experience as a visitor to other Ryman Healthcare facilities in the Wellington region is they too are short of parking. For example, I always had to park in surrounding streets when visiting the Charles Fleming facility in Waikanae.

Of most concern to me, however, is the impact the development will have for parents, staff, and teachers at Karori Normal School, one of the largest primary schools in New Zealand, users of the Karori Pool and the early childhood facility. In an area that is already busy, especially before and after school, there will be more traffic generated and the safety of children and many others, including village residents, will be at risk.

Ryman Healthcare and the WCC need to assure the community how they are going to manage the increased risks that will flow from many more cars and pedestrians using the areas in and around Donald Street, Campbell Street, Firth and Scapa Terraces. During

construction there will be even more dangers posed by heavy trucks using these streets.

### Construction

As someone who lives close to the proposed development, I am worried about the level of dirt, dust and noise that will be generated from what will be years of construction activity. This situation will be compounded by what is a very windy site and I seek assurances that Ryman Healthcare will make good on their original offer to frequently wash the exterior of affected houses.

Since the pandemic started in 2020, many more people now work from home and the effect of increased noise over many years of construction will be very disruptive. I would be keen to know how Ryman Healthcare intends to lessen the noise impacts and whether to confine excessively noisy activity to certain periods of the day and none at the weekend.

As a resident close by, I am worried about the impacts of ground movement from major excavation work at the site. As with the dirt and dust impacts, I would like Ryman Healthcare to confirm adjacent properties will have their homes and sections assessed before and after construction to check whether there has been any movement because of construction work.

### Scale

I understand Ryman Healthcare has attempted to soften the overall appearance and dominance of the buildings to improve the aesthetics of the site, but the scale of the buildings will still be out of character with the surrounding residential area.

The proposed seven level building in the middle of the site (B01B), some 70 m long, will completely dominate the Karori skyline and for the properties nearby, especially those in Donald and Campbell Streets and the north side of Scapa Terrace, there will be negative impacts in terms of shading and views. To suggest that planting will mitigate these effects is disingenuous as such trees will take a long time to grow and when they do, they will shade properties even more.

It is not only residents of nearby properties that will be affected by a lack of sunlight, but so too will the residents living within the village since many of the units will receive little or no sun all year round. In addition, the wind assessment peer review indicates not enough has been done to reduce the effects of excessive wind generated by the development on what is a naturally windy Wellington site.

The WCC must consider a reduction in height for this exceptionally large building or at the very least a reduction in length or two split buildings to allow more sunlight for residents and neighbours. Furthermore, the building design and scale is not consistent with the Council's own Residential Design Guide.

## **CONCLUSION**

As I said at the outset, a retirement village is not out of place in Karori and indeed it will fill much wanted demand for older residents not only in Karori but all around the Wellington region. However, the impacts of the proposed development's size and scale on a site with poor infrastructure and directly adjacent to schools, kindergartens, and residential properties, have not been considered. Until such time as they are, then I do not support the development being given resource consent.

I would like the WCC to reject Ryman Healthcare's proposal and be required to properly consult with all affected parties to prepare a new plan that is at an appropriate scale and character for the suburb.

I look forward to hearing from you and I would prefer to be contacted by letter/post/courier at the address given in the submitter details above.

Yours sincerely

Jude Wallace

Dated 15 May 2022

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Sunday, 15 May 2022 8:22:02 pm

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## Submitter details

**First name:** Simon  
**Last name:** Ross  
**Address:** 383A Karori Road  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0274652085  
**Email:** rossi187@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we are neutral  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

Oppose the amount of parking proposed. Applicants are requesting 230 spaces. This seems too high for the proposed use. The applicants cite but are not bound by requirements in the district plan but these are obsolete with the NPS-UD removing parking minimums. The site is well connected by public transport and will be better connected in the future to a city-wide cycling network. Wellington needs to reduce carbon emissions and can do so by reducing parking which makes private car use less attractive. Further car-share schemes are a good option for residents retirement villages and would reduce the need for parking. Further council should consider the desirability to reducing traffic on Donald Street which is a school zone. Current car movements put children at risk, limiting future demand will help reduce this risk and leave open options for traffic calming outside Karori Normal School.

### Aspects of the application that you are neutral towards:

General use of the site for a retirement village. All ages housing might have been better but this is moot.

### The reasons for my / our submission are:

Goals to reduce carbon emissions, improve child and pedestrian safety and make a more livable Wellington City made more difficult by the amount of parking proposed at this development. Council has the opportunity to reduce these impacts by limiting the amount of parking approved with this consent.

### The decision I / we would like Wellington City Council to make is:

Significantly reduce the number of parking spaces approved.



## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

I oppose the application.

### Submitter Details

Name of submitter: Michael Hamilton  
Address of submitter: 18 Scapa Terrace, Karori, Wellington 6012  
Mobile: 021610479  
Email: michael@gentoo.co.nz

### Submission Statements

See pages below.

#### The reasons for my submission are:

My partner and I own 18 Scapa Terrace which borders the proposed development.

#### The decision I would like Wellington City Council to make is:

I would like the council to reject the application for the reasons stated in our submission and request that Ryman prepare and plan and supporting information that addresses the concerns raised within this submission.

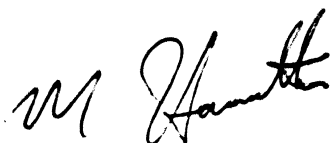
#### Delegation

I request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. (Which I believe to be the default for publicly advised applications.)

#### Oral submission at the hearing

I do not wish to speak in support of the submission.

#### Signature of the submitter:



\_\_\_\_\_ Date: 16th May 2022

# Submission Statements

A retirement community is an ideal use for the old campus. However, there are aspects of the proposed development that give me cause for concern. I feel that the proposal requires some adjustment to obtain a better result for the neighbourhood's existing residents and a better outcome for the development's future residents. I'm sure that with the appropriate ameliorations that the development will become a valuable addition to the suburb, but the current application should be rejected.

My submission is mainly confined to how the development affects our property and our street, however I will also try and inject some comments about the development as it affects the area and its development's own residents, and also aspects of construction work.

I will start with an outline of my key issues and then expand this to specifics. After that I'll briefly outline some concerns with the utility of the site for its future residents. This will then be followed by some general concerns and comments.

# 1 Over-Development of the Site

My principle concern is that the proposal is "over-developing" the site (as described in the District Plan section 4.2.4.1, and 4.2.4.2) and this will have a major significant on the sites neighbours as well as its own residents. The relevant excerpt from 4.2.4.1:

*Over-development of a site can result in adverse amenity effects for adjoining neighbours, and may affect residential character of a street or neighbourhood. Site coverage is the main tool used to control development density.*

Ryman's application features many symptoms of over-development, for example:

1. The proposed development exceeds the normal site coverage of 35%. At 47.1% it covers almost half of the available area (AEE document, page 39).
2. Twelve buildings exceed the permitted building height, including some that are several multiples of the limit (AEE. Page 40).
3. The proposed buildings are close to the minimum set-back distances and are on the edge of their recession plane envelopes.
4. Five different buildings infringe recession plane limits (AEE, page 40).

Ryman's own visual simulations appear to show a crowded and cluttered site with a severe sense of overbearing on the surrounding neighbourhood due to a lack of separation between the proposed blocks and around the boundaries of the site. This can be seen in this crop from the visual simulation package:



Combining so many non-compliant aspects in one development results in circumstances where the council needs to look beyond the permitted RDG baseline rules in order to avoid an unintended or undesirable consequences for the immediate neighbours or the wider community.

From the District Plan 4.2.4.2:

***Breaches of Standards***

*The adverse effects associated with one breach of the permitted activity conditions can usually be mitigated on site, depending on the degree of the breach. However, the cumulative effects of several breaches (depending on the degree) to the permitted activities standards (particularly site coverage, sunlight access planes, height) are more likely to result in developments that are out-of-scale with the surrounding environment and more likely to generate adverse effects on surrounding properties. As development of this nature is not generally anticipated by the Plan, the assessment of the consent will include consideration of whether the amenity values of surrounding properties are affected and whether the proposed development is out-of-scale with the surrounding residential environment.*

In light of the multiple breaches, rather than following a straight forward evaluation of each affected neighbouring property against the baseline-rules, this development needs to be assessed more holistically, looking at the cumulative effects of the infringements, how they interact, and whether the current baseline-rules are adequate to cope with these circumstances.

## **1.1 Scapa Terrace**

As I live at 18 Scapa Terrace, the bulk of our comments will be confined to how this development affects our property and our street. However much of what I have written could very well apply to other neighbouring streets.

As outline in the previous section, the site appears over-developed, having covered the site to 47.1%, several attempts at mitigation come into conflict with each other along the Scapa Terrace boundary.

### **Screening by Plantings in conflict with Storm Water Mitigation**

The narrow setback along the Scapa boundary contains two mitigations for two separate effects:

- 1) In respect to the boundary with Scapa Terrace, the Landscape and Visual Effects Assessment states:  
*“... it is considered that the adverse visual effects will be low from most properties, reducing to very low as planting between the apartment buildings and Site boundary becomes established.”*  
(I will dispute the magnitude of the visual effects in the following section.)
- 2) However the Indicative Landscape Plan states:  
*“Placement of trees along the southern boundary adjacent to B02 to B06 will be restrained to allow for overland stormwater flow. In addition, approximately 50m of boundary (as indicated) will not support large tree species due to stormwater piping - planting will be restricted to small native trees shrubs and groundcovers where appropriate.”*

On the one hand, substantive plantings are required to mitigate the overbearing and overlooking structures. On the other hand, for 50 contiguous metres the setback space is too crowded with flood mitigation and pipe infrastructure to accommodate appropriate plantings, and for the remainder of the boundary the screening will *restrained*. Fifty metres is more than one quarter of the boundary

bordering B02 to B06. The lack of screening in those 50 metres will affect those to either side of the gap and will likely have a true effect perhaps 70 or more metres in length. The *restrained* screening on the remainder of the boundary may not be adequate to achieved the desired mitigation. As I understand it, restrained means fewer, but larger, trees.

Where neighbouring properties can be screened by plantings, they will be adversely affected in respect to sun and line when the plantings become fully established. This is because the plantings will be relatively close to the boundary due to the narrow setback. Large trees this close to the boundary will become a problem once well established, including issues of access for building maintenance, pipework maintenance, tree trimming, remediating storm damage, and safely removing dead trees. Given the strong prevailing northerly winds such tall trees will also place neighbouring structures at some risk because they are all built relatively close to the boundary.

## **Setbacks and Recession Plane rules overwhelmed by Bulk and Height**

The scale of the proposed development and it's many non-compliant features presents circumstances where the existing setback rules and recession plane baselines are inadequate to protect the amenity of the neighbouring properties in Scapa Terrace as required by DP 4.2.4.2:

*In considering resource consent applications for new multi-unit development, an assessment of the proposal's compatibility with surrounding residential development patterns will include an assessment of the primary built form characteristics and layout of surrounding properties. Where a neighbourhood contains regular patterns or consistency of residential development (eg. regular front yard setbacks, spacious rear yards, building heights) it is important that new development respect those patterns to safeguard the amenity values of the surrounding area.*

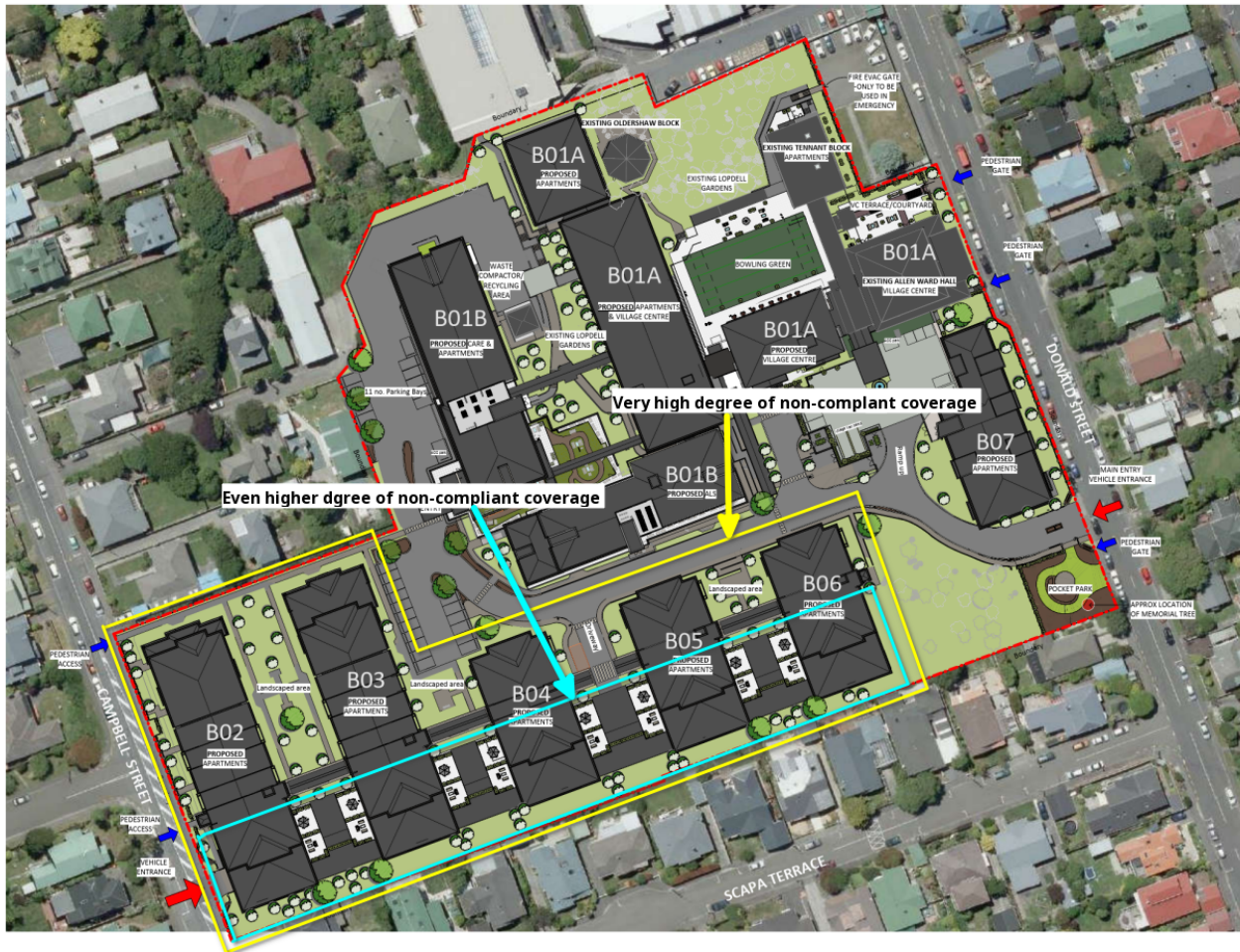
In respect to "Windfall" sites, the DP's objective for their utilisation is defined by DP 4.2.1.5 (my emphasis and underlining):

*4.2.1.5 Enable residential intensification within the Inner and Outer Residential Areas **provided that it does not detract from the character and amenity of the neighbourhood in which it is located.***

The circumstances on the proposed development's boundary with Scapa Terrace are as follows.

### **Site coverage and the distribution of the site coverage**

Total site coverage is non-compliant at 47.1% which is already well above the allowed limit. The site coverage density actually increases rapidly toward the site's neighbours. In the area around B02 to B06, bounded by the neighbours and the sites internal roading, coverage is greater than 65%. Coverage appears to be nearing 80% adjacent to the boundary. See following annotated site overview:



The high percentage of site coverage has prevented many Residential Guidelines and rules from being followed or defeated their ability to successfully mitigate the effect:

1. G1.2 *Maintain consistency with defining and valued neighbourhood patterns.* Blocks B02 to B06 have nothing in common with the existing neighbourhood pattern.
2. G1.6, G1.7 *Relate the height of new development to that of buildings within the immediate area.* Wider, longer, higher buildings could be accommodated if they were buffered by ample space and screening, but at greater than 65% coverage there is simply no space to meet the objectives of the guideline.
3. G2.7 *Locate and model building form to avoid unnecessary or unreasonable shading of private outdoor living spaces or windows to main rooms in adjacent dwellings.* This has not been achieved. As previously described, the screening is either absent or inappropriately large. It fails to achieve a balance of shading and privacy.
4. G3.19 *Consider the modelling of multi-unit building form to achieve a sense of individual identity and address for each dwelling.* The high level of site coverage in the area prevents anything but a repetitive line of duplicated forms.

## Scale of the proposed blocks versus the existing housing

The proposed B02, B03, B04, B05, and B06 blocks are 19m wide on the second level (and even wider if the ground level undercroft parking is included). That makes the blocks wider than almost all the existing neighbouring **sections**.

Such large blocks are out of scale with the existing houses, they don't respect the existing proportions or heights, and they don't sit far enough back from them to allow a transitional zone to ease the change in scale.

Some Scapa Terrace houses will face two storey walls across almost their entire northern boundaries (see DP 4.2.3.1), which not only out of scale, it raises issues of access to sunlight, privacy, and amenity that go beyond mere recession-plane considerations. This appears to be at variance with DP RDG G1.6, RDG G1.7, RDG G3.19.

## Non-compliant height of the proposed blocks

The proposed blocks are non-compliant three level structures. They're higher than the predominantly single story and relatively compact existing houses. The blocks step down to two levels close to the boundary, but the setback is narrow and the width of the blocks remains overbearing, the step down fails to soften the conflicting scale of the existing and proposed structures.

## Repetitive placement and form of the proposed blocks

The repetitive placement of the proposed blocks along the boundary and the limited setback further emphasises their bulk and height (RDG G1.6, RDG G1.7, RDG G3.19).

The impression of height and bulk is increased by large protruding eaves of each proposed block's roofline making each block appear bulkier in width than its floor-plan.

## Contribution of the land form to overbearing, overlooking, and access to light

Due to the sloping nature of most of the neighbouring sections, most of the existing houses are elevated above the ground height of their boundary with the campus. This elevates their principle living spaces to the point where effective screening becomes difficult because it would conflict with the provision of light and sun to their lower rear yards.

The elevated siting of the existing houses and gardens has been incorporated into their origin design and subsequent renovations. Features such as increased glazing and a more open outlook, results in historically greater access to sunlight than these minimums stated in these guidelines G4.3 and G2.5. If the proposed development moves these houses well outside their original design envelope, the owners of these properties are likely to face considerable changes and costs associated with adapting to the new circumstances.

## Setbacks inadequate to mitigate non-compliant coverage and height

As previously stated, the limited setbacks from the boundary with Scapa affords no space for trees on a substantial length of the boundary. Where trees can be accommodated, they will have to be positioned so close to the boundary that, once mature, they will increase the loss of light, sun, and passive-heating to the outdoor spaces and principle living spaces of the existing houses.

While the setbacks conform to the rules of the DP, they are inadequate to overcome the non-compliant form and coverage. They are insufficient to recognise and respect the size and form of the properties along the Scapa boundary. Additionally all of their northern principal yards are small, perhaps half the normal size in the area. This exacerbates issues of size, scale, and overshadowing, which given the scale and site-coverage of the B02..B06 blocks, which further combines to defeat the usefulness of baseline setbacks and recession planes.

If the rules, baselines, and guidelines of the District Plan are going to be broken to achieve increased site coverage and height, then the guidelines provided by baseline setbacks and recession planes rules also need adjustment to bring the non-compliant bulk and height back into proportion in order to meet the objectives of the District Plan.

## Issues compounding

Under ordinary circumstances some of breaches and their mitigations might be regarded as acceptable. But when they accumulate along the entire neighbouring boundary, they reach a point where the proposed development no longer provides reasonable levels of amenity to the effected neighbours and comes into conflict overall objectives and policies of the DP (4.2.1.5, 4.2.4.1, 4.2.4.2, RDG O2.1, O2.3, G4.3, G2.5, G3.14).

For a new development to respect the character of these homes, the large new blocks would need to afford the existing homes more space by employing more proportionate setbacks. If the setbacks were large, the natural rules of perspective and the extra space for plantings would mitigate all of these issues. Instead Ryman has minimised the setbacks, maximised several bulk and location envelopes, exceeded the coverage, repeated this in a pattern along the boundary, and asserted the effects are minor. The sum of the effects are substantial, beyond what the Residential Guidelines, District Plan, and baselines intend for an outer residential development.

## Principle Living Areas ignored

Documents included in the proposal (*Landscape and Visual Design Assessment*) and provided by the council (*Urban Design Peer Review*) have stated that the principle living spaces of the all the neighbouring houses will be affected, but nowhere is there significant analysis of the effects. There should have been some effort made to assess the effects in respect to RDG G2.5 and G4.3. Given the size and closeness to the boundary of the blocks, and considering the number of neighbouring properties, this is a substantial omission.

As previously mentioned, due to the topology rising toward Scapa Terrace, the houses neighbouring B02 to B06 are generally quite elevated. This means that their principle living areas will have a grand stand view over the boundary and the overlooking, overbearing effects will be much greater than that from their generally lower outdoor areas. Many of the existing homes have decks level with their principle living areas, the decks will be subject to the same issues as the principle living areas, in some instances the objectives of G4.3 appears not to be maintained.

## A Detailed Example

To give a more specific example, while no substantive evaluation on the effects to neighbouring living spaces have been provided, it is not hard to carry out a simple exercise to establish the degree of overbearing and scale residents might face. My simple method of evaluation was as follows:



I went out our back gate, I referred to the plans in the application and measured the setback distance of 5.5 m from my boundary to the position of B04. I raised up a house washing pole marked at 0.5m intervals to reach six metres above existing ground height, assuring it was vertical by using a spirit level. I then took photos from our living spaces, offices and decks. For each photo I could then use the 0.5 m marks set on the pole to annotate the photos with the building height. In the following sample image, the proposed building height consists of a +1m earthworks/foundation, two storeys adding up to 6.4 m and an unspecified amount for eaves, which totals to approximately about 7.5 m above existing ground level all told.

I've attached a sample image that includes the pole, the current view, and some annotations that extrapolate up to the proposed height. Perhaps my methods are not exact to the centimetre, but even a half a meter either way would not make any substantial difference.



We were surprised by the reality of "less than minor" effects described in the AEE. Especially considering block B04 would span almost the entirety of our boundary and almost fill the available associated bulk and location envelope. **All the sky and hills in the photo would be replaced by a wall!** Further more, we border the area of the flood mitigations, so there will be no substantive plantings, **just a wall!**

The situation we have today is that our raised deck and principle living areas receive sun until it sets behind the hills in the background. The effect illustrated above would curtail this sun access and bring us below G4.3 and G2.5 (that's both!), this is a significant change (based on our own assessment, the *Urban design assessment page 9*, and the application's shading maps).

Note that the old campus buildings are visible in the background of the photo. Their size and scale is not overbearing or overshadowing because the campus designers left ample space between the existing homes and campus buildings.

Looking to mitigation. The *Landscape and Visual Effects Assessment* asserts that “*planting will help reduce visual dominance*” (#70 page 13), but forgets to mention that the flood mitigation measures prevent this for a large portion of the boundary.

Like all the houses on the street, our property has a small rear garden, so the potential effects are large because we are so close to them. The effects are not only bulk, height, overbearing and overlooking, but also extend to amenity, utility, passive heating, energy consumption, shading and light, especially between May to September.

Due the repetitive placement of the blocks, effective screening would require a number of trees to screen out the view to left, right, and centre – thus increasing the shading and multiplying the light and passive-energy loss. But that’s a moot point, because there is no room for substantive screening.

The implications of the above experiment plays out in primary living spaces along the boundary. The effects are not confined to one or two neighbours, they affect all of the neighbours along the boundary, although some will have the addition of screening by large trees. In respect to shading the effects extend further if the shading from the taller buildings over Campbell Street and Donald Streets is taken into account.

The existing housing is generally single-glazed, their walls are often not well insulated, and large sun facing windows are often used as a way to gather solar radiation and mitigate these historical shortcomings. Every house on the Scapa boundary has north facing primary living spaces with extra glazing for this purpose. If the shading impact is multiplied over the neighbourhood over the darker half of the year, the compensatory use of energy, increased emissions, and increased costs, become quite substantial. This is contrary to DP 4.2.5.1 and 4.2.5.2 in respect to the efficiency of the existing housing stock.

The sum of the effects goes beyond what was intended to be acceptable in the RDG and DP. All of the above issues could be ameliorated if the proposed development provided significant space and separation from it’s neighbours, reduced the blocks to a more sympathetic size, and obeyed more of the guidelines and objectives set out in the District Plan.

## 2 Effect on the site's future residents

When considering the interests of future residents of the proposed village, there are several signs that the non-compliant 47.1% site coverage, and non-compliant building heights, have lead to some significant effects.

### 2.1 Significant Shading and Overlook effects

Several examples can be seen in the placement and design of B01B-ALS, B01B-Apartments, and B01A.

Here is an extract from DRAWING RC22. A1-050:



Specific effects to note on the drawing:

1. The north-east end of levels 1 to 5 of proposed B01B-ALS, have ALS rooms with windows that look out on the wall of B01A which is only 5 metres away and effectively in a well 10 meters wide. Potential access to sun or light to the north-east or north-west is further curtailed because ALS suite's wall and associated windows are recessed considerably. Residents of this suits within this well will have a very enclosed and gloomy outlook (at odds with RDG G3.9). (Mentioned in the *Urban Design Assessment* p. 53.)
2. On level four of the proposed B01B Apartment block there is a terrace that is only 5 metres from B01B-ALS. The respective windows and living spaces on the two blocks are less 10 metres apart (at odds with RDG G3.14, G3.15).
3. B01B-Apartments and B01A each curtail each others access to sun at the opposite ends of the day. These two blocks also greatly shade B01B-ALS in different significant ways

throughout the day. The effects will be very pronounced in the winter months. (At odds with G3.9.)

4. The illustrated B01B Apartment block there is a terrace faces south (at odds with RDG G4.3).

The bulk, height and site coverage of the northern blocks contribute to shading the other southern blocks B02 to B06.

The relative lack of open space in the southern part of the site has resulted in B02 to B06 being lined up and duplicated in regimental fashion contrary to RDG G3.19.

I think the future residents need more consideration. There needs to be a better balance of quantity and quality, better access to light and sun, and better results for privacy and amount of overlooking.

## **2.2 Vehicular access**

The proposed length of B02 and B03 precludes a roadway exit from the site to Campbell Street (there may be a more indirect route via the parking garages of B02 to B06 – not sure). Campbell Street provides the simplest, flattest, most energy efficient access to the local Mall, petrol stations, the local medical centre, Tennis club, bowling club, generally the most concentrated area of local amenities. Campbell Street is also less busy, Donald Street is often cluttered by school traffic, school buses, pool traffic, pedestrian crossing, and traffic lights (plus it's also a back access to Marsden College).

It would seem sensible to provide the residents of the northern blocks B01A/B easy access to Campbell Street by reusing the existing campus roadway. Such a roadway might also better separate the scale of B02 and B03 from the houses along Campbell Street to the north. It would also potentially enable wastewater and storm-water pipes to exit via an accessible roadway rather than passing under B02 and B04.

For older drivers having entrances and exits on both streets would assist those for whom driving has become more difficult – it provides plenty of options for planning a route with predominantly left hand turns.

## **2.3 Parking**

The proposed design allows for very few visitor car-parks. Having often helped elderly relatives visit their siblings in a variety of retirement facilities, it would make these trips far easier if reasonable numbers of visitor parks were available to keep the outdoor exposure and walking distance to a minimum. This is probably more important for this site due to Donald Street having an undulating nature and the presence of school. School traffic often overflows demand for parking for some distance along the nearby streets. The proposed size of the complex also raises issues of peak visit times for relatives of the residents and the need to ensure that too is catered for. Perhaps some open space can be reclaimed for parking purposes and at the same time be used to create a less dense feel to the site.

The proposed development introduces a potential for high trip generating activities during the day and during the weekends. This additional traffic that may interact with existing high trip activities

such as the after-school rush and weekend recreational events (Ben Burn Park, Marsden). In particular, kerb-side parking is at a premium near the school at drop-off and pickup times, any increase in congestion at these times creates a significant safety risk. Some consideration should be given to residents only parking, limited time parking zones, or loading zones should be considered as a method to constrain and control traffic in the local area. Traffic calming measures may help. Lights at the intersection of Campbell Street Karori Road may be required.

### **3 Storm-water and Flooding**

Climate change is now with us. Rather than aiming to have a neutral effect in Scapa Terrace, this is an opportunity to improve flooding outcomes for the entire neighbourhood.

If much of the site's storm water infrastructure will be built over, it would seem prudent to do this now. It's forward looking to increase safety margins now rather than have to revisit the site's infrastructure at some future date as. From Ryman's perspective, ensuring their site and residents are not inconvenienced by potential disasters in the neighbourhood would be a good investment for the future.

### **4 Foundation work**

My own experience of performing foundation work in the area revealed the campus and surrounds is criss-crossed by old stream beds with mud like soils extending down to 1.5-2.0 meters before anything more solid is encountered. It's probable that most houses in the area do not have piles extending to those depths and that they may be prone to uneven settlement. The council should place requirements on the development that minimise and monitor that possibility of construction work causing additional foundation settlement for neighbouring properties. For example, foundation piles should be augured not driven.

### **5 Participation in Pest Eradication**

Conditions should be placed on any development that it budget for a proportional scale of pest control to help the suburb as a whole toward the goal of becoming pest free. As much of the suburb is actively engaged in pest control it would be an omission if such a large area was allowed to become a pest sanctuary in the centre of an area with an ongoing intensive pest-eradication campaign.

### **6 Wider Context**

DP 4.2.1.6 *Encourage the retention and adaptive re-use of existing houses in the Inner and Outer Residential Areas.* The current housing crisis raises further special circumstances in the shape of considerable public interest in whether intensification in the suburbs can be balanced against the amenity of the existing housing stock and neighbourhood. It needs to be demonstrated that non-compliant large developments can fit into existing neighbourhoods without undermining the utility of the existing homes. Decisions made here may influence the long term quality of owner-occupied and rental housing in the local area as well as the area's socio-economic well-being.

## 7 Potential Remedies

Here are some suggestions for remedying the major issues:

1. The buildings B02..B06 should altered and set back further from the boundary:
  - i. This then allows sufficient space for planting appropriately sized trees that will provide screening for neighbours and residents.
  - ii. If flood flow requirements still do not allow trees, the increased distance will at least allow distance/perspective effects to partly mitigate for their absence.
  - iii. An increased setback would restore some aspect the respectful distancing of out-of-scale buildings that was a strong design element of the former campus;
  - iv. Increased setbacks would diminish the shadowing effects and maintain the energy efficiency of existing homes and help encourage further investment in upgrading of the existing housing stock.
2. The proposed development includes upper levels are de-emphasized/disguised by dark colouring – this strongly hints they are out of scale in the area. Those levels should be eliminated from the development: B02..B06 should all be reduced to two levels. B01B, B01A-ALS, and B01B should be reduced by two levels in way that admits more sun and light all around.
3. Consideration should be given to adjusting the design of B01A and B01A-ALS to prioritize more sun and light to the northern sides of B01B.
4. Consideration should be given to reducing B01B to admit more sun and light to B04 to B06.

## 8 Summary

As it stands the sum of the effects on the existing amenities, described above, add up to something that is significant, far more than minor, and that the proposed development is not consistent with the overall objectives and policies of the District Plan. Some of the Districts Plans rules and guidelines have been push beyond the point where they work as intended. The issues are mainly due the majorly non-compliant aspects of the design, specifically site-coverage and height. This has resulted in over-developed proposal which should be declined.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Monday, 16 May 2022 8:49:37 am

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## Submitter details

**First name:** Jennifer  
**Last name:** Mattlin  
**Address:** 36 Cooper St  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0220605854  
**Email:** wellington@hiatlas.com

## Application details

**Applicant name:** Mitchell Daysh Ltd on behalf of Ryman Healthcare Ltd  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I oppose the proposed Ryman development for the following reasons:

- Over-bearing of buildings
- Loss of privacy and enjoyment of my property
- Impacts on constrained infrastructure in Karori.
- Stormwater and wastewater analysis and limited mitigations.
- Building scale out of character and dominating effect over surrounding residential area.
- Building design and scale not consistent with WCC Residential Design Guide.
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Shading effects.
- Wind impacts.
- Parking impacts.
- Noise impacts.
- Traffic impacts, particularly during construction.
- Construction impacts – dust, noise, ground movement.

### Infrastructure constraints

WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit.

This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification.

Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater.

The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale.

There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community.

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**

Over-bearing and out of character buildings

I live on Cooper St and the size of the proposed buildings will completely dominate the outlook from my backyard.

Our family spends most of our time in backyard and the over-dominance of the buildings will result in loss of privacy and enjoyment of our own property.

Our skyline will be obliterated and we stand to lose significant sunlight from the shading effects of the new buildings.

Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.

Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.

Suggesting that the over-bearing of the proposed buildings will be mitigated by planting is insulting. Trees that are big enough to disguise the proposed buildings will take years to grow and will then likely generate even more shading on our property.

**The decision I / we would like Wellington City Council to make is:**

THE DECISION WE WOULD LIKE WCC TO MAKE IS:

I/we request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours and prepare a new plan that is at an appropriate scale and character for the neighbourhood.



# Submission on resource consent application

Absolutely Positively  
**Wellington** City Council  
Me Heke Ki Pōneke

## Notes for the applicant

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If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application     Oppose the application     Neutral

## Submitter details

Name of submitter: Carol Allan

Address of submitter:  
67 Chamberlain Rd Karori

Phone (day):

Mobile: 021 676663

Email: karorialans@gmail.com

## Submission statements (use additional pages if required)

The aspects of the application that I support/~~oppose~~ are:

The entire proposed retirement village

**The reasons for my submission are:**

Karori needs such a development. It will release many homes for people to buy. It means the elderly of Karori can stay in Karori where all their support + activities are. It will provide health care within the village which will assist in relieving pressure on the health system. Many jobs will be created which brings increase in financial benefits to the local economy. I can't wait to move in.

**The decision I/we would like Wellington City Council to make is**

(include any conditions of consent you would like to see imposed):

Is to approve consent for this retirement village to go ahead.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Carol Allan

Date

14/5/22

**Note:**

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
- This is not a statutory form, but is provided as a guide to people wishing to lodge a submission.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**Privacy information**

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified resource consent process. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

**From:** [Carol Allan](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Re: Submission on resource consent Ryman development Karori  
**Date:** Tuesday, 17 May 2022 10:32:16 am

---

Hi Krystle

Sorry for the omission, I would prefer not to speak

My submission was not constructed as well as I would normally do as I thought I had until the 27th May to submit and so rushed it at the eleventh hour.

What I would have liked to have added was that I have lived in Karori since 1978, and my family / friends / doctor / dentist etc and most of my activities are also in Karori, so it would be ideal for me to be able to move into the proposed Karori Ryman retirement village

Thank you

Carol

On 16/05/2022, at 12:05 PM, BUS: Consent Submissions

<[BUSConsentSubmissions@wcc.govt.nz](mailto:BUSConsentSubmissions@wcc.govt.nz)> wrote:

Hi Carol

Thank you for your submission to the public notification of 26 Donald Street and 37 Campbell Street, Karori.

You did not put a tick in the section on the form about making an oral submission in support of your written submission. Can you please advise if you do wish to speak or would prefer not to?

Kind regards

**Krystle Leen**

Business Support | Resource Consents | Wellington City Council

E [Krystle.Leen@wcc.govt.nz](mailto:Krystle.Leen@wcc.govt.nz) | W [Wellington.govt.nz](http://Wellington.govt.nz) |

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If received in error you are asked to destroy this email and contact the sender immediately. Your assistance is appreciated.



---

**From:** Carol Allan <[karorians@gmail.com](mailto:karorians@gmail.com)>

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Monday, 16 May 2022 2:03:42 pm

---

## Submitter details

**First name:** Virginia  
**Last name:** Carpenter  
**Address:** 21 Donald Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 049766523  
**Email:** ginnicarpenter@gmail.com

## Application details

**Applicant name:** Ryman Healthcare  
**Site address:** 26 Donald Street Karori.  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

Construction traffic and traffic increases. Also concerned about impact on bird life, lack of staff and visitor parking and the impact on my privacy. A further big concern is the impact on pedestrians; particularly primary and pre school children

### Aspects of the application that you are neutral towards:

Smaller scale construction

### The reasons for my / our submission are:

Effect on privacy and wellbeing

### The decision I / we would like Wellington City Council to make is:

Limited scale of construction

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Monday, 16 May 2022 2:48:59 pm

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## Submitter details

**First name:** Bonita  
**Last name:** Gestro  
**Address:** 6 Scapa Tce  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0212742159  
**Email:** bonita.gestro@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I support residential intensification and the use of the old Teachers College site for a retirement village however oppose the proposed Ryman development for the following reasons:

- Over-bearance of buildings
- Impacts on constrained infrastructure in Karori.
- Stormwater and wastewater analysis and limited mitigations.
- Building scale out of character and dominating effect over surrounding residential area.
- Building design and scale not consistent with WCC Residential Design Guide.
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Shading effects.
- Wind impacts.
- Parking impacts.
- Noise impacts.
- Traffic impacts, particularly during construction.
- Construction impacts – dust, noise, ground movement.

### Aspects of the application that you are neutral towards:

I support residential intensification and the use of the old Teachers College site for a retirement village.

### The reasons for my / our submission are:

Infrastructure constraints

- WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit.

- This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification.
- Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater.
- The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale. There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community.
- The Teachers' College site is a floodplain. With the loss of the playing fields that acted as a soak pit, the increase in hard surfacing on the site, the poor state of Wellington's water infrastructure, I am concerned about the effects that high rainfall events will have on neighboring properties in Scapa Tce.

#### Over-bearing and out of character buildings

- I live on Scapa Tce and the size of the proposed buildings will completely block the view I currently have of Makara Peak and hills towards the south-west (of Karori).
- I also stand to lose a reasonable amount of sunlight from the shading effects of the new buildings.
- Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.
- Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.
- Suggesting that the over-bearing of the proposed buildings will be mitigated by planting is insulting. Trees that are big enough to disguise the proposed buildings will take years to grow and will then likely generate even more shading on my property.

#### Wind

- Karori is windy, with the Teachers' College site sitting directly in the path of the prevailing wind.
- I am very concerned that the height, length, rectangular shape and north-south orientation of nearly every building in the development will generate increased wind effects on our property
- Ryman's only mitigation appears to be planting which will take years to take effect.
- The wind assessment peer review appears to conclude that not enough has been done to mitigate the effects of excessive wind generated by the development.

#### Noise

- We are concerned by the noise of tyre squealing from the undercroft carparking that will be adjacent to my property.
- We expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal and that the southern façade comprises suitable noise attenuating materials.

#### Carparking and traffic

- Of the 39 carparks available to staff and visitors, 3 are set aside for accessible parking and 2 for the village's vans, leaving a total of 34 available for staff and visitors.
- The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. This leaves just nine (9) carparks available for visitors to the site.
- This number of carparks is completely inadequate for a village of this size. The neighbouring streets will become clogged with cars from Ryman's visitors and staff.
- I live in Scapa Tce and am very concerned of the effect that this will have on my property, as well as the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School and Donald Street pre-school.
- I am also very concerned by the amount of traffic that will be generated by the development and the impacts that this will have on the safety of our streets and in particular the safety of children around the local school, kindergartens and pre-schools.

#### Construction effects

- I am concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honour their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.
- I am concerned by noise generated during construction. I work from home periodically and the effect of 5 years of construction noise will be a disturbance.
- 4-5 years of continuous construction traffic on our narrow residential streets will be extremely disruptive and dangerous particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood centres.
- I am also concerned by the effects of ground movement from excavation and piling on my property and request that Ryman honour their original offer to neighbours impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

**The decision I / we would like Wellington City Council to make is:**

I request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours and prepare a new plan that is at an appropriate scale and character for the neighbourhood.

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

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If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village

Service request number: SR 471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Joost & Kerri van Amelsfort

Address of submitter: 12 Scapa Terrace  
Karori, Wellington 6012

Phone (day): (04) 4766 326

Mobile: 021 918 427

Email: [joostva@yahoo.com](mailto:joostva@yahoo.com)

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

Please see attached written submission



**The reasons for my submission are:**

Please see attached written submission

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

Please see attached written submission

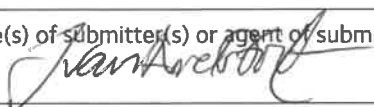
**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*



Date

16 May 2022

**Note:**

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- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
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- it is frivolous or vexatious
- it contains offensive language
- it discloses no reasonable or relevant case
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

## **Introduction**

This is a submission on the proposed Ryman Healthcare Limited retirement village application (SR 471670).

This submission is being made by Joost van Amelsfort and Kerri van Amelsfort, of 12 Scapa Terrace, Karori. Our property adjoins the southern boundary of the proposed site.

While we have no fundamental objection to utilisation of the site for the proposed purpose, we oppose the application.

This document includes submissions on the following matters:

- the character of the proposed development
- the impacts of the proposed development on our privacy, and use and enjoyment of our property
- the impacts of the proposed development on shading affecting our property
- the impacts of the proposed development on traffic and parking within the immediate vicinity
- construction noise, dust, working hours associated with the build phase on the site
- strain on Karori infrastructure

In making these submissions, while we acknowledge that the site represents a “windfall site” of the purposes of the Wellington City District plan, the proposed development includes a number of elements which significantly breach fundamental District Plan rules, standards, requirements and tolerances for multi-unit developments in Outer Residential Areas.

We submit that it is appropriate to require, as conditions of any approval, a reduction in the overall scale, height and mass of the proposed buildings comprising the proposed village.

### **1 Character**

- 1.1. We submit that the overall proposed design is not compatible with, or respectful or responsive to, the character of the surrounding residential setting.
- 1.2. We do not agree with the conclusions noted in the Urban Design Assessment by McIndoe Urban, that the combination of the Karori Normal School, the Karori Pool and the existing (former Teachers’ College) building on the site result in a “baseline view” of the area that departs from one with a conventional suburban character. That is important, as that is a baseline character assessment is critical to considering the compatibility of the proposed design in its surroundings for the purposes of assessing the surrounding residential character under the Wellington City District Plan and the Resource Management Act 1991 (**RMA**). In particular:
  - the overwhelming majority of the existing land use adjoining the site on the eastern, southern, western and northwestern edges are for suburban housing (see, for example, Figure 28 at page 30 of the Urban Design Assessment) – the make up of the residences in the areas immediately adjoining the site on Campbell Street, Donald Street and Scapa Terrace are useful examples of this.

- the predominant character of the adjoining land use comprises standalone, single story houses with some extending to two storeys.
- there are very few multi-unit developments or multi-storey developments in Karori – this includes in the most intensified areas in and immediately surrounding the Karori Mall and Marsden village areas

1.3. The proposal will result in a significant increased scale and density of buildings on the site. In particular:

- 1.3.1. The proposed multi-unit developments in building B02 – B07 significantly add to the mass/bulk of buildings located on the site and the total site coverage, relative to the previous configuration of the site as the Teachers’ College.
- 1.3.2. The series of apartment buildings in the South part of the site (comprising buildings B02 – B06) will result in a change in character for a significant area of the site, and adjoining properties on the southern boundary on Scapa Terrace, that currently have an open character (see, for example, para 6.23, page 14 of the Landscape and Visual Effects Assessment by R A Skidmore).
- 1.3.3. Buildings B02 - B06 have been designed as modern apartments, which:
- are of a scale and height that infringe several key development standards that apply under the Wellington City District Plan to residential multi-unit developments in Outer Residential Areas;
  - represent a key part of the change to total site coverage, building heights and scale of the proposed design – with the area proposed to be used for those buildings previously having comprised open space for use by the wider community; and
  - are in marked contrast to the nature and character of established residences which overwhelmingly define the key adjoining streets (Campbell Street, Donald Street and Scapa Terrace) and overall immediate vicinity.
- 1.3.4. The assertion in the application that Building B01B will be 3 storeys shorter than the former Malcolm Building ignores the fact that the additional height of the Malcolm Building related solely to that part of the building used to house the aerial component. That additional height was not a feature of the Malcolm Building as a whole (see further Figure 14, page 20 of the Urban Design Assessment by McIndoe Urban).
- 1.3.5. The overall design of Building B01B involves a significantly greater overall footprint, mass and height along two channels of a large part of the north-south axis and east-west axis on the site.

- 1.3.6. The overall design of Building B01B will mean that building will have significant prominence and dominance of the immediate neighbourhood and a large part of the wider area which directly looks over the site.
- 1.4. We submit that the overall scale, footprint, and dominance of the proposed village does not integrate readily into the surrounding environment. We submit that it stands in stark contrast to the character of the surrounding residential setting.
- 1.5. We submit that appropriate conditions of any consent approval for the proposed development include:
- 1.5.1. A reduction in the maximum heights of various buildings within the proposed site - particularly Building B01B – which has been designed to exceed the maximum height permitted under the District Plan by 17.58m and 14.54m (across its two joined parts). That proposed height for the two elements of Building B01B means the permitted maximum building height under the District Plan will be exceeded by 219% and 181% respectively; and
- 1.5.2. A reduction in the scale and total site coverage of the proposed design.

## **2 Privacy**

- 2.1 We submit that the overall design of Building B01B and Buildings B02 – B06 will have an unreasonable impact on the privacy of the Scapa Terrace neighbours adjoining the site on the southern end.
- 2.2 We submit that the:
- height and scale of Building B01B; and
  - height, scale and proximity of Buildings B02 – B06
- adversely affect the overall residential amenity for those neighbours.
- 2.3 In particular:
- 2.3.1 The height of Building B01B means that occupants and users of a majority of the floors within that building will have unobstructed, grandstand views into adjacent properties;
- 2.3.2 Buildings B02 – B06 will be sited in close proximity to the boundary with neighbours on the even-numbered houses on Scapa Terrace. We understand that the proposed set-back is compliant, it is the scale and height of those buildings that is the key factor;
- 2.3.3 Despite the proposed set back and step up from two to three levels for Buildings B02 – B06, they remain over-bearing for those neighbours and the combination of the height, scale and proximity of those buildings will inevitably result in a reduction in privacy;

- 2.3.4 The courtyard / walkways proposed for the gaps separating Buildings B02 – B06 will also overlook those neighbours, with users of those courtyards / walkways then having elevated, grandstand views directly into the open areas and living spaces of those neighbours which are orientated to the northern face of those sites;
- 2.3.5 The impact of those changes is reflected in the Landscape and Visual Effects Assessment by RA Skidmore, which concludes that the design will “result in moderate high visual change when viewed from these properties [i.e. the even-numbered properties located on Scapa Terrace];
- 2.3.6 The impact of those changes is also reflected in the Urban Design Peer Review (Sarah Duffell, August 2021) which concludes she does not completely agree with the Urban Design Assessment by McIndoe Urban that there will be a high level of visual containment. Ms Duffell’s concerns are based on the even-numbered houses on Scapa Terrace being “single story and set at street level [which] creates a relatively open aspect northwards that will be impacted by the dwellings along the [proposed design’s] south boundary;
- 2.3.7 These submissions and concerns are contemplated by the Objective and Policies for Outer Residential Area multi-unit developments which:
- seek to ensure that all residential properties affected by such developments continue to have access to reasonable levels of residential amenity; and
  - note such development can “have quite different impacts on the amenity of surrounding properties in terms of reduced privacy, overbearing, and reduced access to daylight and sunlight. These effects are generally more pronounced when new units are located near boundaries and built taller than adjacent dwellings” (Objective 4.2.2, and Policy 4.2.4.1).
- 2.4 The key living areas and open spaces on our property (12 Scapa Terrace) face the southern boundary of the site. Our family constantly uses those spaces, which we consider critical to the use and enjoyment of our property.
- 2.5 While we note Ryman has proposed significant planting to mitigate some of those impacts, planting will itself take a long time to mature to be of any meaningful impact and would need to be of a scale that will itself cause adverse shading impacts for even-numbered Scapa Terrace residents given that planting will be even closer to the boundary than the proposed building set-back.

Examples of the north face of our property – looking towards the southern edge of the site.  
In each case this would now be materially dominated by Buildings B02 – B06 and B01B:



View from lounge to north with bi-folds onto large deck area



View from kitchen annex to north to deck and site



View from kitchen to north to deck and site



View from lounge to north / north west to site

2.6 The scale and proximity of the designs (in particular Building B01B and Buildings B02 - 06) will be over-bearing and will result in loss of privacy and enjoyment of our own property.

2.7 We submit that appropriate conditions of any consent approval for the proposed development include:

2.7.1 A reduction in the maximum height Building B01B;

2.7.2 Further set back of Buildings B02 – B06 from the southern boundary of the site;  
and

2.7.3 A reduction in the scale and total site coverage of the proposed design.

### **3 Shading**

3.1 We submit that the overall design of Building B01B and Buildings B02 – B06 will have an adverse impact on the sunlight access to the living and outdoor spaces of Scapa Terrace neighbours adjoining the site on the southern end, and that this represents an unreasonable impact on their residential amenity.

3.2 In particular:

3.2.1 Buildings B02 – B06 are in areas that have historically been open space, and which are proposed to exceed the permitted maximum height tolerance for multi-unit developments in Outer Residential Areas;

3.2.2 The two components of Building B01B will have a mass and total coverage that will significantly affect the shading impacts of the site on the adjacent neighbours;

3.2.3 Those shading impacts are significantly more adverse than was the case with the Teachers' College;

3.2.4 In some instances the extent of the shading impacts mean the proposed design will not align with the Residential Design Guidelines (e.g. for 14, 16, 18, 20, 22 and 24 Scapa Terrace in relation to the recession plane);

3.2.5 The impacts of that shading will be exacerbated by the height, mass and proximity of Buildings B02 – B06 to the boundary with the even-numbered Scapa terrace neighbours adjoining the southern edge of the site; and

3.2.6 The impacts will be most prevalent at mid-winter, when access to direct sunlight for neighbours' living and outdoor spaces is most important to the amity of those residences and neighbours' wellbeing.



Examples of the sun trajectory on the north face of our property – looking towards the southern edge of the site. In each case, this would now be materially affected by Buildings B02 – B06 and B01B:



Photo taken at 12.17pm on 16 June 2019 (ie near mid-winter)



Photo taken at 12.17pm on 16 June 2019 (ie near mid-winter)



Photo taken at 3.11pm on 16 June 2019 (ie near mid-winter) – note low trajectory of sunlight

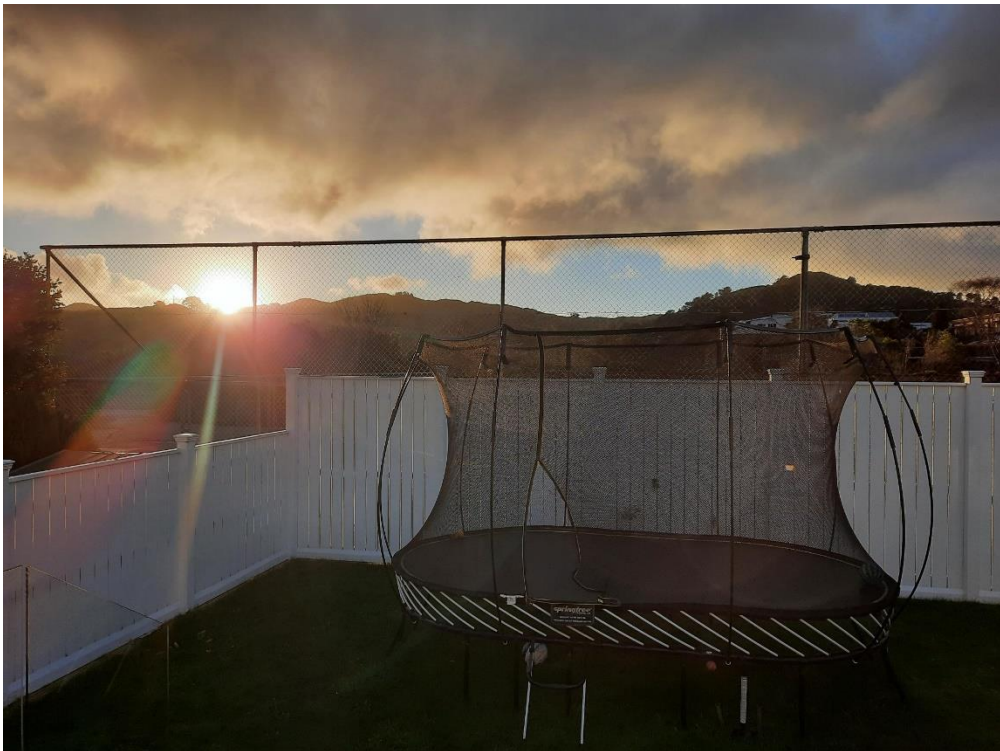


Photo taken at 4.24pm on 16 June 2019 (ie near mid-winter) – note low trajectory of sunlight

3.3 We submit that appropriate conditions of any consent approval for the proposed development include:

3.3.1 A reduction in the maximum height Building B01A and B01B;

3.3.2 Further set back of Buildings B02 – B06 from the southern boundary of the site; and

3.3.3 A reduction in the scale and total site coverage of the proposed design.

#### **4 Traffic and parking**

4.1 We submit that proposed development will have an unreasonable adverse impact on:

4.1.1 traffic within the immediate vicinity; and

4.1.2 resident's parking access in the streets surrounding the site.

4.2 In respect of traffic, we submit that those adverse impacts arise from:

4.2.1 The addition of between 40 – 73 vehicle per hour movements resulting from the proposed village;

4.2.2 The majority of those movements (85%) being concentrated in Donald Street, which is heavily used by children accessing Karori Normal School, children accessing Marsden School, the Donald Street kindergarten, users of the swimming pool (throughout the day) and users of Karori Normal School hall (after end of school, and during weekends);

4.2.3 The majority of movements of users externally accessing the site adding to the existing concentration and overuse issues already affecting Karori Road – we submit that the conclusion made by Commute Transportation Consultants in the Transportation assessment Report that “the level of traffic that will be generated by the Proposed Village is significantly less than that of the previous occupation of the Site” is not tenable and does not accord with our experience of traffic flow from the site when it was used as a Teachers' College. In particular a significant proportion of access to the Teachers' College was via bus networks via Donald Street which have now been discontinued; and

4.2.4 When the site was used as a Teachers' College, our experience was that notwithstanding many students accessing the college by bus, parking spots on Scapa Terrace were frequently fully taken up to the detriment of residents.

- 4.3 In respect of parking, we submit that those adverse impacts arise from the proposed scale of on-site parking relative to the profile of residents, staff and visitors to the site. In particular:
- 4.3.1 The proposed 230 car parks onsite do not comply with the District Plan requirement that would apply, and which would require 310 onsite parking spaces;
  - 4.3.2 The 194 parking spaces earmarked for all residents, staff and visitors (Table 6.2 RTA Parking Requirement in the Assessment Report) underweights the requirement for visitor parking, assuming only 1 space per 5 units;
  - 4.3.3 We submit that for a proposed village of this scale, there will be significantly more demand for parking spaces at key times (such as weekends) which will adversely impact residents in the immediately surrounding streets.
- 4.4 We submit that the traffic and parking impacts of the proposed design will only be exacerbated when considered together with other in-flight development proposals for the immediate vicinity – including a significant residential developments planned for the corner of Campbell Street and Karori Road, and 74 Chamberlain Road.
- 4.5 We submit that appropriate conditions of any consent approval for the proposed development include:
- 4.5.1 A reduction in the scale and total site coverage of the proposed design, which will reduce the overall resident numbers and provide a greater ability to accommodate on-site parking; and
  - 4.5.2 Dedicated resident’s only parking spaces for neighbours immediately adjoining the site to ensure priority access to spaces by dwellings.

## **5 Construction**

- 5.1 We submit the scale and duration of the construction phases for the proposed village will:
- 5.1.1 materially adversely impact neighbouring residents’ use and enjoyment of their properties;
  - 5.1.2 create risks of protracted exposure to noise, dust and other pollutants; and
  - 5.1.3 be particularly impactful for neighbours on the northern and southern boundaries of the site, given the prevailing wind direction is predominantly north / northwesterly (affecting the southern end of the site) and south / south-westerly (affecting the northern end of the site).
- 5.2 We submit that appropriate conditions of any consent approval for the proposed development include:
- 5.2.1 “baseline” site assessments for neighbouring properties, with a requirement for Ryman to contract experts to undertake periodic assessments (with minimum

periods set, say 3 monthly) of any cracks, ground movements, etc that may result from vibrations and other construction activities on site;

- 5.2.2 a requirement for periodic cleaning of neighbours' properties (with minimum periods set, say 3 monthly) to mitigate the adverse dust impact from the site;
- 5.2.3 having the perimeters appropriately protected by barriers, such as plastic wraps commonly used on other commercial builds, to contain dust and pollutants; and
- 5.2.4 limiting construction activity during weekends so that no construction takes place on Sundays, and is more limited on Saturdays than would otherwise be permitted on a standard weekday

## **6 Infrastructure**

- 6.1 We submit that the application as submitted does not appropriately factor in the potential adverse impacts on Karori's already strained infrastructure, given its scale. In particular:
  - 6.1.1 WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit;
  - 6.1.2 This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification;
  - 6.1.3 Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater;
  - 6.1.4 The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale. There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community; and
  - 6.1.5 The matters noted above will only be exacerbated by the additional significant residential developments planned for the corner of Campbell Street and Karori Road, and 74 Chamberlain Road.

Joost & Kerri van Amelsfort

12 Scapa Terrace, Karori

## Form 13

### SUBMISSION ON A NOTIFIED RESOURCE CONSENT APPLICATION UNDER SECTION 95A, RESOURCE MANAGEMENT ACT 1991

**To:** Wellington City Council

**Submission on:** Resource Consent Application Ref (SR 471670)

**Name of Submitter:** Fire and Emergency New Zealand (Fire and Emergency)

This is a submission on a resource consent application by Ryman Healthcare Limited for the construction of a comprehensive care retirement village at 26 Donald Street and 36 Campbell Street, Karori, as notified by Wellington City Council.

Fire and Emergency is not a trade competitor for the purpose of Section 308B of the Resource Management Act 1991 (RMA).

The specific part of the application that Fire and Emergency's submission relates to is:

- the accessibility of emergency service vehicles throughout the site to buildings and firefighting water supplies.

#### **Fire and Emergency's submission is:**

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (RMA), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

The application site is located in a reticulated area but due to the scale of the development it is vital that firefighting water supply and access requirements are adequately provided for. The Infrastructure Assessment which supports the application states that the water supply network servicing the site has sufficient capacity available to supply suitable flows for firefighting purposes, which has been determined in accordance with the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008 (Code of Practice). Furthermore, an additional connection will be constructed to supply the potable water and fire hydrants proposed within the site, and a new mains connection will provide a dedicated supply to the sprinkler system which is proposed to be installed within all onsite buildings.

While Fire and Emergency acknowledge that the applicant has considered fire safety and the mitigation of fire risk in developing the proposal, a review of the proposed architectural drawings raises concerns regarding whether the fire safety precautions asserted in the application can be achieved. Fire and Emergency's key areas of concern are as follows:

- Access to the site appears to be very restricted and limits the number and types of appliances that Fire and Emergency can deploy onsite in the case of an emergency. Due to the scale of development, standard appliances and aerial vehicles will be required to respond to a fire at the

proposed retirement village. The 'Designers' guide to firefighting operations Emergency vehicle access F5-02 GD' (Refer to **Appendix A**) and 'AS 2890.2:2018 Parking facilities Off-street commercial vehicle facilities' demonstrate the access requirements for aerial vehicles. The widths and gradients of the proposed internal roading layout are undefined and therefore it is unclear whether the proposal allows for the following access requirements of both standard appliances and aerial vehicles:

- The application states the internal road network will have a minimum width of 5.5m, however a minimum width of 6.5m is required for aerial appliance access.
  - Curved carriageway sections should allow for the expected vehicle body swing. For aerial vehicles, the minimum inner radius should be 5.2m and the outer radius 12.5m. Fire and Emergency have concerns regarding whether the curved carriageway sections within the proposed development allow for this, particularly near the Donald Street entrance for the length of road between B07 and B01B.
  - Stabilisers used on aerial vehicles limit hard-standing gradients. Aerial vehicles can only use their stabilisers and operate if the ground slope is within +/- 5°. Fire and Emergency would like clarification on the gradient of the internal road network to ensure they can effectively deploy aerial appliances onsite.
  - There is no ability for Fire and Emergency to put resources on the south side of B02-B06.
  - The access point from Campbell Street and the underground car parks do not appear to provide for the height requirements of emergency vehicles. This restricts Fire and Emergency's ability to service all of the underground car parks and any structures in the south-west corner of the site. Additionally, the installation of underground tanks between buildings B03 and B04 in trafficable areas is a concern for the safety of operating appliances.
  - There is no access to the northeast corner of the site given most of the buildings in these areas will exceed the maximum allowable hose run distance.
- Any carriageway with a dead end needs a turnaround area so that emergency vehicles do not have to carry out multi-point turns, allowing Fire and Emergency to move vehicles quickly in emergency to protect them and ensure the safety of their staff. The minimum turning radius of turnaround areas should be no less than 12.5m for aerial vehicles, which does not appear to be provided for by the proposed internal network layout. The proposed water supplies will further limit the deployment of resources. The design appears to only supply two additional hydrants. However, the fire design appears to show a single attendance point for the site, which will significantly limit Fire and Emergency's ability to operate on the proposed site.

The New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Water Supplies Code of Practice) is a New Zealand Standard that outlines the water supply capacity and pressure needs for firefighting purposes, together with access requirements. Fire and Emergency requires certainty that there will be sufficient water supply in an emergency in a manner that allows them to service all buildings onsite.

Pumping vehicles have a limited hose length. Accordingly, Fire and Emergency must have access to a water supply within an appropriate distance to enable them to base operations near the building (refer Appendix A of Fire and Emergency's 'Designer's guide' that sets out compliant site layout examples). It is essential that all floors and areas of all on-site buildings can be accessed by fire personnel. If firefighters cannot physically get water to a fire, they cannot help. Fire and Emergency would also like to take this opportunity to advise the applicant that a 'Place of Safety' evacuation strategy is unlikely to be approved due to the very limited number of areas available for safe evacuation zones. An 'All Out' strategy will therefore need to be planned

for unless the identified factors that will restrict Fire and Emergency's access to the development and delay their response time are addressed.

Based on the information provided and limitations created by the scheme design, Fire and Emergency would like to meet with the applicant and their design team to discuss how these issues could be resolved.

Before Fire and Emergency can advise whether they can support the proposal, Fire and Emergency would like the applicant to demonstrate how the above issues have been satisfactorily addressed.

Fire and Emergency is happy to discuss the matters raised in this submission and provide advice on how to address these issues to ensure the protection of property and life, while maintaining the operational safety of fire crews and resources.

Fire and Emergency wishes to be heard in support of its submission. If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at the hearing.

Fire and Emergency does not request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

Kind regards,



Signature of person authorised to sign on behalf of  
**Fire and Emergency**

<b>Date:</b>	16/05/2022
<b>Electronic address for service of person making submission:</b>	Fleur.rohleder@beca.com
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## APPENDIX A

# Designers' guide to firefighting operations

## Emergency vehicle access

F5-02 GD



WHAKARATONGA IWI

**FIRE**  
**EMERGENCY**

NEW ZEALAND



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**Status of this document**

This document is issued by Fire and Emergency New Zealand.

**Recommendations for change**

The document, its content and specific processes are not to be altered except through Fire and Emergency New Zealand document management processes.

Requests or recommendations for changes to this material should be sent to National Manager Response Capability.

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## 1. Context

<b>Scope</b>	We need to be able to reach your building with our different vehicles in a fire or other emergency. This chapter helps you understand the types of vehicles we use, and how you can provide access for them on your site.
<b>Who this chapter is for</b>	This chapter outlines our position on appropriate considerations for building owners, building designers and other building practitioners, on emergency vehicle access to sites, both completed and under construction/refurbishment.  It may also provide useful guidance for anyone undertaking planning of any kind that needs to consider emergency vehicle access.
<b>What is not included in this chapter</b>	This chapter is a guide to provide advice to the building industry on Fire and Emergency's operations and recommendations in relation to emergency vehicle access – it does not replace any mandatory/statutory requirements.  We recommend you read it alongside other chapters in the guide. This is not an exhaustive guide to Fire and Emergency operations, but an overview of the relevant expectations building industry stakeholders can have of our operations.
<b>Legislative framework</b>	We aim to reduce the risk to both firefighters and building occupants through encouraging appropriate building design which allows us to achieve our statutory objective (under the Fire and Emergency New Zealand Act 2017) to reduce the incidence of unwanted fire and the associated risk to life and property. Our functions include responding to and suppressing fires and attending to other types of emergencies that may occur in a building.  Read this guide alongside the: <ul style="list-style-type: none"> <li>• mandatory requirements of the New Zealand Building Code (Building Code)</li> <li>• requirements of New Zealand Standards (Standards), and</li> <li>• Building Act 2004.</li> </ul> This guide <b>does not</b> replace any part of the Building Code or Standards or other mandatory building requirements.  We note that the Building Code <a href="#">Fire Safety C – Protection from fire</a> clauses C1– C6 define the Building Code performance requirements of the Building Act 2004. Clause C5 is the performance requirement on 'Access and Safety for Firefighting Operations'.

## 2. Definitions

The following definitions apply for the purposes of this chapter. Defined terms used throughout this document are consistent with the Building Act 2004, Building Code and Acceptable Solutions C/AS2.

<b>Address point</b>	This point is part of the data set administered by Land Information New Zealand, (LINZ). It is the address (point) where the building is commonly known to be located. It can be either a single point or a range of individual points as described on the LINZ data set.
<b>Aerial device</b>	Encompasses all the types of Fire and Emergency aerial components (turntable ladder, elevating platforms, elevating monitors, baskets, cages and booms).

<b>Aerial vehicle</b>	A specialised emergency vehicle that has an aerial device that hydraulically rises to suppress fire and/or effect rescue as well as support other operations.
<b>Allowable bearing pressure</b>	The calculated pressure required to counter compression forces exerted by dead loads (i.e. the minimum strength required to maintain stability under a weight load).
<b>Appliance</b>	An emergency vehicle that provides capability to Fire and Emergency's mandated functions.
<b>Attendance point</b>	<p>The place where the first attending Fire and Emergency pumping vehicle will stop and set up. <b>There is only one attendance point</b>, usually, at the building's primary entry point. Firefighters may be deployed to other firefighter access points from here.</p> <p>A full description of the attendance point can be found within <b>F5-02 GD FFO Emergency vehicle access</b>.</p>
<b>Breathing apparatus (BA)</b>	A device firefighters wear to provide breathable air in an atmosphere that is immediately dangerous to life or health. Also known as self-contained breathing apparatus (SCBA) or compressed air breathing apparatus (CABA).
<b>Building hydrant system</b>	Fixed water main pipe system, normally already charged with water and supplemented by Fire and Emergency pumps. This should not be confused with an in-ground hydrant connected to the town mains.
<b>Canopy</b>	Projecting hood supported on brackets, corbels or columns over a door, window or niche.
<b>Carriageway</b>	The driveable portion of a road (which may or may not include a sealed top surface layer).
<b>Collapse zone</b>	<p>The collapse zone is an area around the building measured as 1.5 times the height of the structure. This is the area which would be considered dangerous in the event of an outward failure of a facade element.</p> <p>In this document, the term 'collapse zone' only applies to pre-cast concrete panel (tilt-slab) and unreinforced masonry type construction.</p> <p>Use a pragmatic approach where practicable when designing, and when in doubt, consult Fire and Emergency.</p>
<b>Fire engineering brief (FEB)</b>	A formal process outlined in the International Fire Engineering Guidelines for all stakeholders to define and agree on the basis and scope of work for fire engineering analysis.
<b>Firefighter access point</b>	<p>The place where firefighters gain access to a building. This must comply with the New Zealand Building Code Clause C5.6:</p> <p>Buildings must be designed and constructed in a manner that will allow firefighters, taking into account the firefighters' personal protective equipment and standard training, to:</p> <ul style="list-style-type: none"> <li>(a) reach the floor of fire origin,</li> <li>(b) search the general area of fire origin, and</li> <li>(c) protect their means of egress.</li> </ul>

**Fire and  
Emergency  
vehicular access**

Vehicular access provided to Fire and Emergency vehicles should be consistent with Acceptable Solution C/AS2 Part 6 (relating to firefighting).

Buildings must be provided with access that allows appliances to reach a position that makes it convenient for firefighters to get into the building and access the inlets to fire sprinkler systems or building fire hydrant systems, where these are installed.

Occupants of risk group SI are more likely to require rescue by Fire and Emergency. An additional recommendation for this risk group is to allow access for the larger size of aerial vehicles to get as close to buildings as possible with space to 'jack' the vehicle.

If a building has a large footprint (which is most likely to occur for a single-storey building such as a warehouse) and is not protected with fire sprinkler systems, access to two sides of the building is required. This gives Fire and Emergency the ability to access the building in a number of places and means that their travel within the building is minimised to reach any fire source.

In addition, for the health and safety of our personnel, this access:

- should not involve a canopy, or other part of a structure to drive or park under
- should be located outside a horizontal collapse zone requirement of 1.5 times the height of a portal frame building
- should be within 135 metres of a firefighting water supply.

Where access meets these recommendations above, and is acceptable to Fire and Emergency, the 75 m hose run may be measured from this hard-standing point.

**Hard-standing  
area (for Fire  
and Emergency  
vehicles)**

A hard (roading) surface capable of withstanding the fully laden weight of a fire appliance from which fire operations for a structure are conducted. A hardstanding should be big enough for the fire appliance to enter, exit and manoeuvre and for firefighters to move around it to connect hose and safely access equipment. In most cases, the hardstanding will be the main road if the structure is close to it.

A full description of the hardstanding area can be found in this chapter (F5-02 GD FFO Emergency vehicle access).

**Jacks**

External outriggers and jacks fitted to aerial vehicles that extend to stabilise the vehicle when its centre of gravity shifts during the operation of the aerial device.

**Overhang**

The portion of a vehicle's body that extends forwards past the front wheels or backwards past the rear wheels. It relates to body swing, which is where a set of wheels when turning acts as a pivot point and the bodywork swings past that point. The longer the overhang, the greater the body swing.

### 3. Our operations

- Vehicle types** We use several different types of vehicles (also referred to as appliances). Each type of vehicle carries a different combination of equipment and has a specific function at an emergency incident. Most of our vehicles have a specially built body fitted on a commercial vehicle chassis, normally a truck.
- Vehicle types include pumping appliances, aerial appliances and a range of specialist function vehicles such as mobile command units, logistics and support vehicles, and water tankers.
- Timeliness** To fight a fire effectively, save lives and limit damage to property, we need to respond quickly and start applying water while the fire is still small. While automatic detection systems and good information help us respond quickly, good access is also vital.
- This highlights the importance of having designated hard-standings with all the provisions for a fast fire attack proximate to as many parts of a building as possible, that are free from obstructions.

## 4. Challenges

### 4.1. Fire and Emergency vehicles

- Capability of vehicles** Pumping appliances are vehicles used to pump water for firefighting. They carry a relatively small amount of water (1,350–2,000 litres) and a limited length of hose. This is why we must have access to a water supply and must also be able to base our operations near the building, so firefighters can reach the fire with water. Often, this can be done from the public road, and this is how we prefer to operate where possible. However, for large sites, sites with multiple buildings, or sites with large set-backs, our vehicles may have to operate from within your site, which is less favoured.
- Aerial appliances are larger and heavier than our other vehicles and may be on a two-, three, or even four-axle heavy vehicle chassis. Aerial appliances have limited reach and need to get close to buildings or structures to operate effectively. We will normally try to reverse these vehicles into position beside a building and, where possible, operate from building corners.
- For these reasons, we recommend that you provide access and working space for Fire and Emergency vehicles on your site.

- Vehicle dimensions** Each vehicle type has different dimensions. Table 1 below shows maximum vehicle dimensions of Fire and Emergency's current fleet of vehicles.

**Table 1 – Maximum parameters for Fire and Emergency vehicles**

Dimension	Maximum dimensions
Gross vehicle mass	25 t
Maximum overall length	12.6 m
Maximum overall width	2.55 m (6.5 m when stabilisers are deployed)
Required free height	4 m



## 4.2. Access requirements

### Carriageway widths

Carriageways should be wide enough to allow our vehicles to get through them easily and to allow us to carry out emergency operations. This means that when our vehicle is parked, we can easily open and exit the doors, access equipment from its compartments and safely connect the hose to the pump.



Figure 1 – A pumping appliance showing width required for hose

To accommodate a Fire and Emergency vehicle, carriageways should have a minimum width of 4 m. This can be reduced to a minimum width of 3.5 m at entrances, provided tight turns are not required (see Figure 2 below).

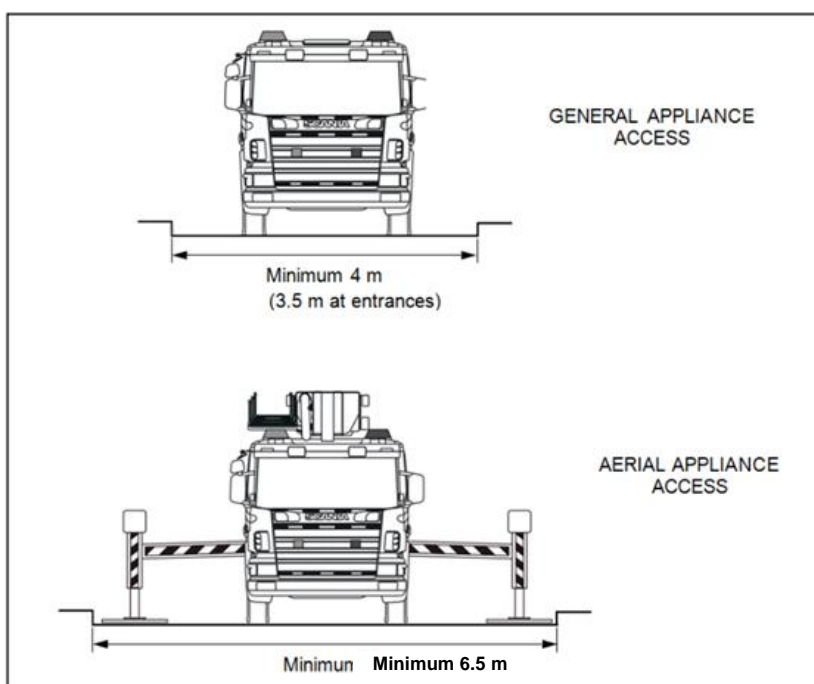


Figure 2 – Minimum carriageway widths along straight sections

Curved carriageway sections should allow for expected vehicle body swing. The minimum distance between the inner and outer arcs should be not less than 5.0 m for pumping vehicles and 7.3 m for aerial vehicles (see Figure 3).

For pumping vehicle access, the minimum inner radius should be 6.3 m and the outer radius 11.3 m. For aerial vehicle access, the minimum inner radius should be 5.2 m and the outer radius 12.5 m (see Figure 3).

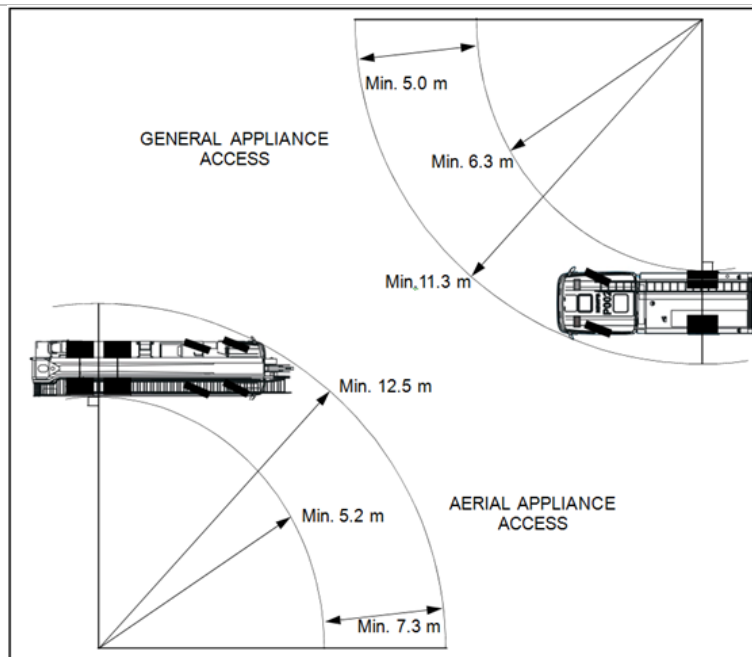


Figure 3 – Minimum carriageway widths – curved sections

The radius dimensions above are for wall-to-wall clearance from body overhang, and do not represent the vehicle's wheel tracks.



Figure 4 – Showing long rear overhang



Figure 5 – Showing long front overhang

**Kerb dimensions**

Kerbs built along the edges of a carriageway should be no higher than 250 mm and should be free of vertical obstructions at least 300 mm back from the kerb face to allow clearance for front and rear body overhang.

This means that if absolutely necessary, we can mount the kerb with our vehicles, although this is a last resort due to the additional hazards.

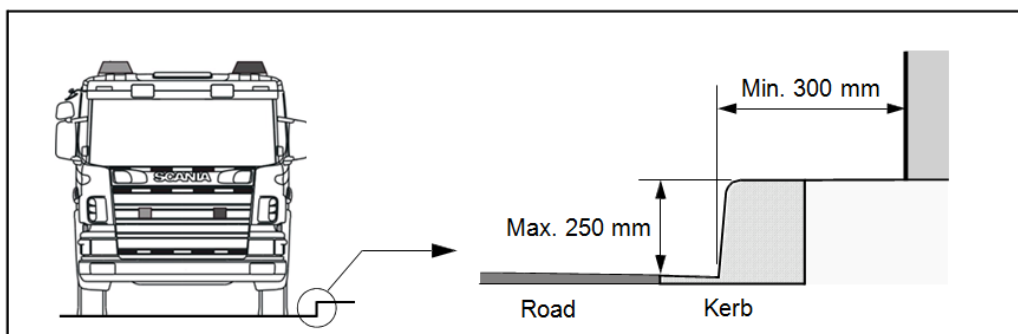


Figure 6 – Carriageway kerb clearance dimensions

**Turning areas**

Any carriageway with a dead end needs a turnaround area so that our vehicles don't have to do multi-point turns to turn around. This is so we can move our vehicles quickly in an emergency to protect them.

Fire and Emergency vehicles need to be able to turn a full 360° within a 25 m circle (wall-to-wall clearance) to meet Waka Kotahi NZ Transport Agency requirements. The minimum turning radius of turnaround areas should be no less than 11.3 m for pumping vehicles and 12.5 m for aerial vehicles (see Figure 3).

The Waka Kotahi NZ Transport Agency's Road and traffic guidelines for New Zealand on-road tracking curves for heavy motor vehicles (RTS 18) as indicated in Table 1, should be considered. Table 2 below summarises the tracking curves and their radii for design vehicles.

Table 2 – Turn radii and tracking curve sheet numbers for the design vehicles at various radii (Source: <https://www.nzta.govt.nz/assets/resources/road-traffic-standards/docs/rts-18.pdf>)

Vehicle	Radius of turn				
	10 m	12.5 m	15 m	20 m	25 m
8 m rigid truck	1	2	3	4	5
11.5 m rigid truck		6	7	8	9
Semi-trailer*		10	11	12	13
Tour coach		14	15	16	17

Table 3 – Fire and Emergency fire vehicle types in relation to the Waka Kotahi NZ Transport Agency on-road tracking curves

Fire and Emergency fire vehicle type	Waka Kotahi on-road tracking curve
Pumping appliance	8 m medium rigid truck
Aerial appliance	12.6 m rigid truck

**Change of level** The only acceptable means of providing access through a change of level is a ramp that meets the requirements set out below. Fire and Emergency vehicles are not designed to drive up or down steps.

**Access ramps** Ramps should not delay vehicle response and should provide entry and exit clearances for Fire and Emergency vehicles.

**Gradients for straight ramps** Fire and Emergency prefers a ramp gradient of 1:8 or less for straight ramps. The maximum straight ramp gradient our vehicles can negotiate is 1:5.

**Gradients for curved ramps** Access ramps that follow a curved or circular profile in plan view should have a maximum gradient no greater than 1:10 (measured along the centre line). The vehicle chassis will twist and flex when driving up a curved ramp, so we need a lower gradient.

**Change of ramp gradients** Access ramps should have a smooth transition between the main ramp gradient and entry and exit gradients. A minimum 4.0 m long 1:15 transition grade is best for both ramp approach and departure (see Figure 7 below).

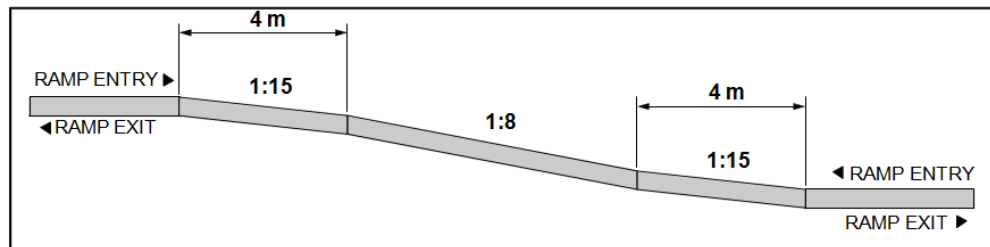


Figure 7 – Maximum access ramp gradients

**Reduced gradient clearance** When a change of gradient includes a recessed threshold such as a gutter (e.g. for storm water drainage), the reduced approach and departure clearance should be allowed for in the design of the access way (see Figure 8).

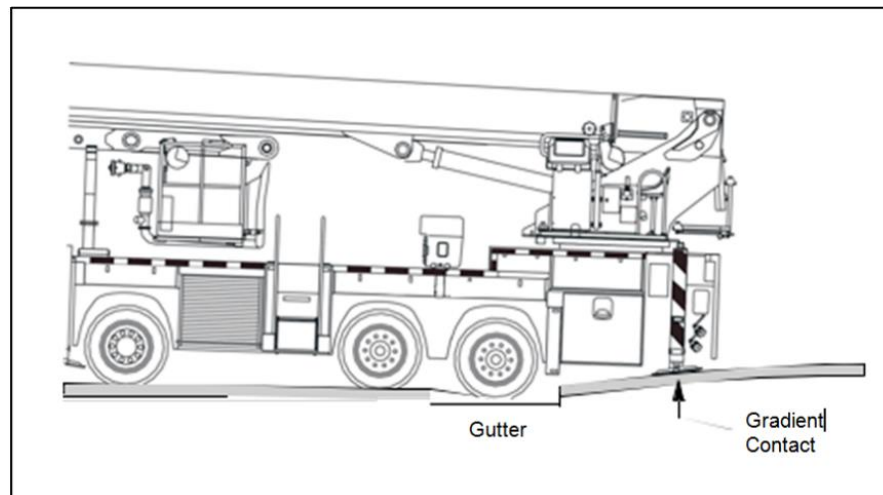


Figure 8 – Reduced gradient clearance due to gutter

When wheels go into a gutter, the body slants downwards, reducing the effective underbody clearance height at both the front and rear overhanging sections. The clearance is even smaller when the gutter is deeper and/or when the overhang is longer.

**Building and structure** We need vehicle access routes to have an unobstructed clearance height of at least 4.0 m so that vehicles can pass through openings. This includes clearance from

## clearance height

building construction, archways, gateways/doorways and overhanging structures (e.g. ducts, pipes, sprinklers, walkways, signs, structural beams, trees, hanging cables, etc.).

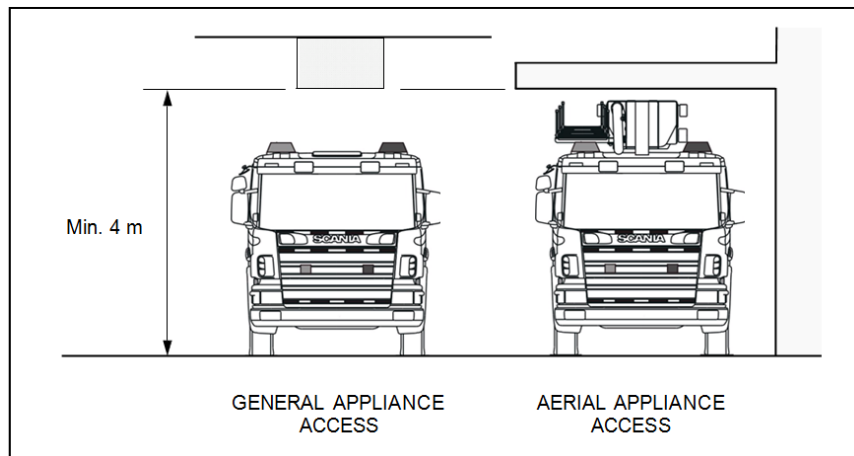


Figure 9 – Building and structure clearance heights

**Note:** Special considerations apply where there are both height restrictions and gradient changes. In some cases, height clearance will need to be more than 4.0 m so the vehicle can make the gradient change.

## Ensuring clear access

We need clear access routes for our vehicles at all times.

Site managers should ensure that nothing blocks or partly blocks the carriageways for our vehicles. We need to be able to drive through access routes during all weather conditions. This means we need some form of hard-standing so our vehicles don't get bogged down. If a vehicle gets stuck, it creates two problems, we can't use it, and it may stop other vehicles getting through.

Perimeter security points (e.g. sliding/swinging gates, boom gates, bollards and vehicle security barriers) should not make it difficult for vehicles to gain access.



Figure 10 – Clear access available to a site

Site entrances, internal entrances and space between buildings should be at least 3.5 m wide and 4 m high.

The following common occurrences often make access difficult:

- Overhanging vegetation which restricts height clearances
- Overgrown vegetation which restricts width access and clearances

- Illegally parked vehicles in long driveways, narrow rights of way or halfway onto kerbs in small streets.

Contact us at [designers.guide@fireandemergency.nz](mailto:designers.guide@fireandemergency.nz) to discuss.

### 4.3. Vehicle weights (loads)

#### Static loads of vehicles

Carriageways need to be able to withstand the load of a Fire and Emergency vehicle, particularly if they are supported, elevated or reinforced by structural members (e.g. suspended floors, ramps, wharfs, aprons, etc.).

Figure 11 shows the vehicle loads exerted through the wheels that are used to determine forces acting through load-bearing structural members. Wheelbase distances between the front and back axles range from 3.7 to 5.5 m for pumping vehicles and 4.4 to 5.6 m for aerial vehicles. Designers should consider the distances between the wheels – both longitudinal and lateral – when calculating point loads for the wheels.

**Note:** Axle loads, such as those shown in Figure 11, are not always evenly distributed over all wheels.

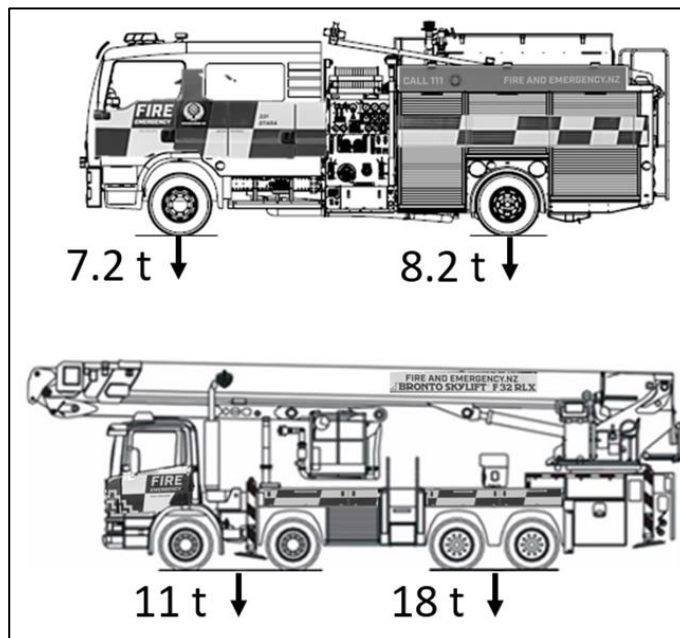


Figure 11 – Axle loads of vehicles

In general, access routes should be able to withstand a laden weight of up to 25 tonnes with an axle load of 8 tonnes or have a load-bearing capacity of no less than the public roadway serving the property, whichever is lower.

Roadway pavements designed for aerial vehicles must withstand a vehicle with multiple axles spaced at no less than 2.5 m centres and each carrying 8.2 tonnes.

The hardness of the carriageway surface should withstand static pressure of no more than 850 kPa from a vehicle's tyres.

**Note:** Pavements Fire and Emergency vehicles use for access should be designed according to Waka Kotahi NZ Transport Agency's HN-HO-72 traffic loading specifications, to meet the load-bearing requirements.

### Dynamic loads (on aerial vehicles)

Aerial vehicles are fitted with stabilisers that prevent the vehicle from overbalancing when the aerial device is operating. Aerial vehicles will either have two stabilisers at the rear only, or more commonly, two front and two rear stabilisers (see Figure 12).

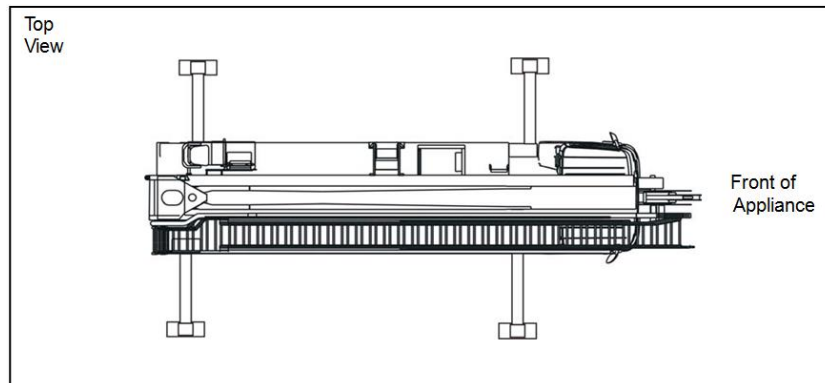


Figure 12 – General stabiliser arrangement on aerials

Extending and rotating the aerial device changes the vehicle's weight distribution and creates other forces, such as torsion moment forces. These exert dynamic forces through the stabiliser.

**Note:** The changing distribution of weight can cause up to 70 percent of the total vehicle weight to be borne by a single stabiliser.



Figure 13 – Highlights the space requirements for jacking stabilisers

The maximum dynamic loads and pressures exerted through a single stabiliser of the Bronto Skylift F44 RLX, with a fully loaded cage (500 kg), at maximum extension/outreach and under worst-case rotation angle, are:

- maximum stabiliser force: 200 kN
- maximum footplate pressure: 11 kg/cm<sup>2</sup> (1079 kPa)
- maximum bearing plate (block) pressure: 2.8 kg/cm<sup>2</sup> (274 kPa).

Consider the maximum exerted pressures above when calculating the minimum Allowable Bearing Pressure (ABP) for the carriageway or hard-standing area.

## 4.4. Site access and security features

### Security features can delay site access

Many sites have security measures in place that restrict public access. These are to meet legal requirements for health and safety in the workplace and to keep the site and its staff secure.

However, enhanced security measures often delay firefighters when they investigate fire calls. Features such as security gates, high fences and bollards delay our vehicle access.

Security features can also translate to issues with physical access to buildings, including to locations where firefighters are required to interface with fire systems. Where enhanced security measures are present, this is likely to delay our investigation of the fire call.

There are solutions to overcome the issues presented by enhanced security and these include automatic unlocking or opening of security features upon a fire alarm activation. These may also have a time delay built into the system, so the site remains secure for longer, accounting for our response time. A master lock control switch could also be provided for our use in an area we can access such as a fire control centre (FCC).

Alternatively, where the building fire alarm is connected directly to Fire and Emergency, keys to the site may be provided to us.

Another option is a lockbox on site provided that information regarding its location and its access is provided to us ahead of time. On-site security staff, or contracted security staff who respond automatically in the event of a fire alarm activation, may also be able to provide access for us.

If you have any concerns about responding Fire and Emergency crews having timely access to a site, contact [designers.guide@fireandemergency.nz](mailto:designers.guide@fireandemergency.nz) to discuss options.

## 4.5. Vehicle hard-standing

### Vehicle hard-standing requirements

A vehicle hard-standing is a designated area that can withstand the laden weight and associated loads of the Fire and Emergency vehicle and its crew and facilitate firefighting operations.

For our vehicles to work effectively, the hard-standing must be as close as possible to both the water supply and the structure to be protected. We encourage you to follow the guidance within this document. If you can't meet the criteria in this chapter, email [designers.guide@fireandemergency.nz](mailto:designers.guide@fireandemergency.nz) for help.

Under Clause C5.3 of the Building Code:

Buildings must be provided with access for fire vehicles to a hard-standing from which there is an unobstructed path to the building within 20 m of:

- (a) the firefighter access into the building, and
- (b) the inlets to automatic fire sprinkler system or fire hydrant systems, where these are installed).

This is to enable firefighter to get into the building and to move freely around our vehicles.

Under Clause C5.4 of the Building Code:



Access for fire vehicles in accordance with clause C5.3 must be provided to more than 1 side of firecells greater than 5,000m<sup>2</sup> in floor area that are not protected by automatic fire sprinkler system.

The hard-standing should:

- comply with Section 4.2 of this chapter regarding access requirements
- enclose a rectangle at least 4.0 m wide and 11 m long
- not have a gradient of more than 1:50
  - Stabilisers used on aerial vehicles limit hard-standing gradients. Aerial vehicles can only use their stabilisers and operate if the ground slope is within +/- 5°
- be outside the collapse zone (see 'Collapse zone' in the Definitions section for details)
- be in the open air and have no overhead obstructions along its entire area
- be within 135 m of a pressurised water supply, or within 6 m of an open water source, due to equipment limitations (supply hose)
  - This distance should not include any sharp angles
  - This distance should be measured taking into consideration obstructions such as buildings, fences, waterways and storage or parking areas. See [Appendix B](#) for examples.

**Note:**

- Hose runs can be measured from this point, provided all the requirements above are satisfied.
- The above hard-standing requirements do not apply to the following classified uses (as defined in Clause A1 of the Building Code):
  - backcountry huts
  - detached dwellings
  - within household units in multi-unit dwellings
  - outbuildings
  - ancillary buildings.

**Attendance point**

Our policy is to respond to a single attendance point. The attendance point is generally at the building's main entrance and is often (but not always) the same as the address point. This location should include the alarm panel, building hydrant/sprinkler inlets, a suitable firefighter access point, etc.

If there is a remote place within the building which cannot be reached by hose within 75 m of the attendance point, a common solution is to provide a building hydrant system. In certain situations, this is even mandated by prescriptive guidance (for example Acceptable Solution C/AS2, paragraph 2.2.1 and associated tables)).

**Note:** This attendance point should not be confused with a firefighter access point or vehicular hard-standing, which may be remote from the attendance point and provided with a building hydrant outlet. It may also provide a mimic fire alarm panel or other fire safety features.

The attendance point should also include all the requirements for a hard-standing area and meet clauses C5.3 and C5.7 of the Building Code.

When identifying an attendance point, factor in the following:

- Operational procedures do not allow firefighters to drive vehicles down narrow lanes, under canopies or through flood water

- It is our policy not to park a vehicle under a canopy, or within the collapse zone in certain circumstances (see 'Collapse zone' under Definitions)
- Location of and ease of access to fire alarm panel
- Location of and ease of access to the controls for fire safety systems
- Inlets for fire sprinkler and/or building hydrant (riser) systems.

See [Appendix B](#) for examples.

### **Safer siting areas**

We often strategically place our vehicles at building corners, particularly our aerial vehicles.

This is because the corners are generally safer if the building collapses outwards, and we can usually use our aerials across two faces of the building providing for better coverage and observation.

## **5. Recommendations**

### **Fire and Emergency recommended approach**

We need you to consider how you could provide access for firefighting vehicles in the course of your work. Our requirements may differ case by case, basis and you should discuss any queries you have with us.

We recommend you consider the following points:

### **Consider the dimensions of our vehicles**

- Access gates, driveways should meet the minimum dimensions outlined.
- Driving surfaces should be designed to support the weight of our vehicles.

### **Consider the manoeuvrability of our vehicles**

- Dead ends and turning circles should meet the requirements discussed in this chapter.
- Straight ramps designs should take in into account our vehicles' needs, particularly at ramp entry and exit points.
- Curved ramps should be carefully considered in relation to our vehicles' weights and clearances including vehicle overhangs.
- Recesses such as storm water drains should be carefully placed to consider our vehicle movements.

### **Consider hard-standing recommendations**

- Hard-standings should be at the correct distance from building, firefighting systems/inlets and firefighting water supplies.
- Consider vehicle loading requirements for attendance and hard-standing points.
- Allow working space for firefighters in and around our vehicles. Consider:
  - doors opening
  - firefighters exiting vehicles with PPE and BA on
  - whether firefighters can access important equipment around our vehicles, such as ladders and hoses.
- Allow working space for the deployment of stabilisers on our aerial vehicles.

### **Consider how we will access the site in an emergency**

- Consider how any site security could affect our access, particularly outside business hours.

- Keep access routes always clear, particularly from vegetation, parked cars and temporary structures, etc.
  - Speed is critical – the sooner we start firefighting operations, the more likely we are to limit the consequences.
- 

## 5.1. Completing the firefighting facilities checklist

### **Completing the checklist**

When completing F5 SC Part C: 2 Access to site and 3 Access to building of the firefighting facilities checklist (FFFC), you should state what access you have given us to key facilities and the attendance point. This will allow us to understand the proposed layout and ensure that this access meets our operational needs for firefighting.

Remember that facilities are put in place for our use in emergency situations and the location of those facilities should be decided in consultation with us.

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## 6. Related information

### 6.1. Designers' guide to firefighting operations

- F5 01 GD FFO Introduction
- F5-02 GD FFO Emergency vehicles access
- F5-03 GD FFO Radio communications
- F5-04 GD FFO Fire alarm panels
- F5-05 GD FFO Building hydrant systems
- F5-06 GD FFO Automatic sprinkler systems
- F5-07 GD FFO Stairs in buildings
- F5-08 GD FFO Lifts
- F5-09 GD FFO Fire Control Centres
- F5-10 GD FFO Evacuation and rescues
- F5-11 GD FFO Water supplies
- F5-12 GD FFO Construction, refurbishment and demolition sites
- F5-13 GD FFO Multi-tiered vehicle stacking buildings
- F5-14 GD FFO Firefighting shafts in taller buildings

### 6.2. Legislation

- [Fire and Emergency New Zealand Act 2017](#)
- [Building Act 2004](#)
- New Zealand Building Code (Building Regulations 1992 > New Zealand Building Code > [C Protection from fire](#))
- [Health and Safety at Work Act 2015](#)

### 6.3. Standards

- SNZ PAS 4509:2008 Firefighting water supplies code of practice
- NZS 4510:2008 Fire hydrant systems for buildings
- NZS 4512:2021 Fire detection and alarm systems in buildings
- NZS 4541:2020 Automatic fire sprinkler systems

### 6.4. References

- Waka Kotahi NZ Transport Agency guidelines:
  - [Vehicle mass and dimension rules](#)
  - HN-HO-72 – [Waka Kotahi NZ Transport Agency Bridge manual \(2013\)](#)  
**Note:** This standard covers the requirements for all pavements bearing a heavy load such as a fire appliance.
  - [Road and traffic guidelines – New Zealand on-road tracking curves for heavy motor vehicles \(RTS 18\)](#)
- Acceptable Solution C/AS2 > [New Zealand Building Code Compliance C Protection from fire](#)
- [New Zealand Building Code handbook \(third edition, amendment 13\)](#)

**Note:** The legislation, standards and references referred to in this guide (including those listed above) are relevant at the time that this document was published. Note however that the legislation/links may have been updated since this document was published.

## Appendix A – Images

### Pumping appliances

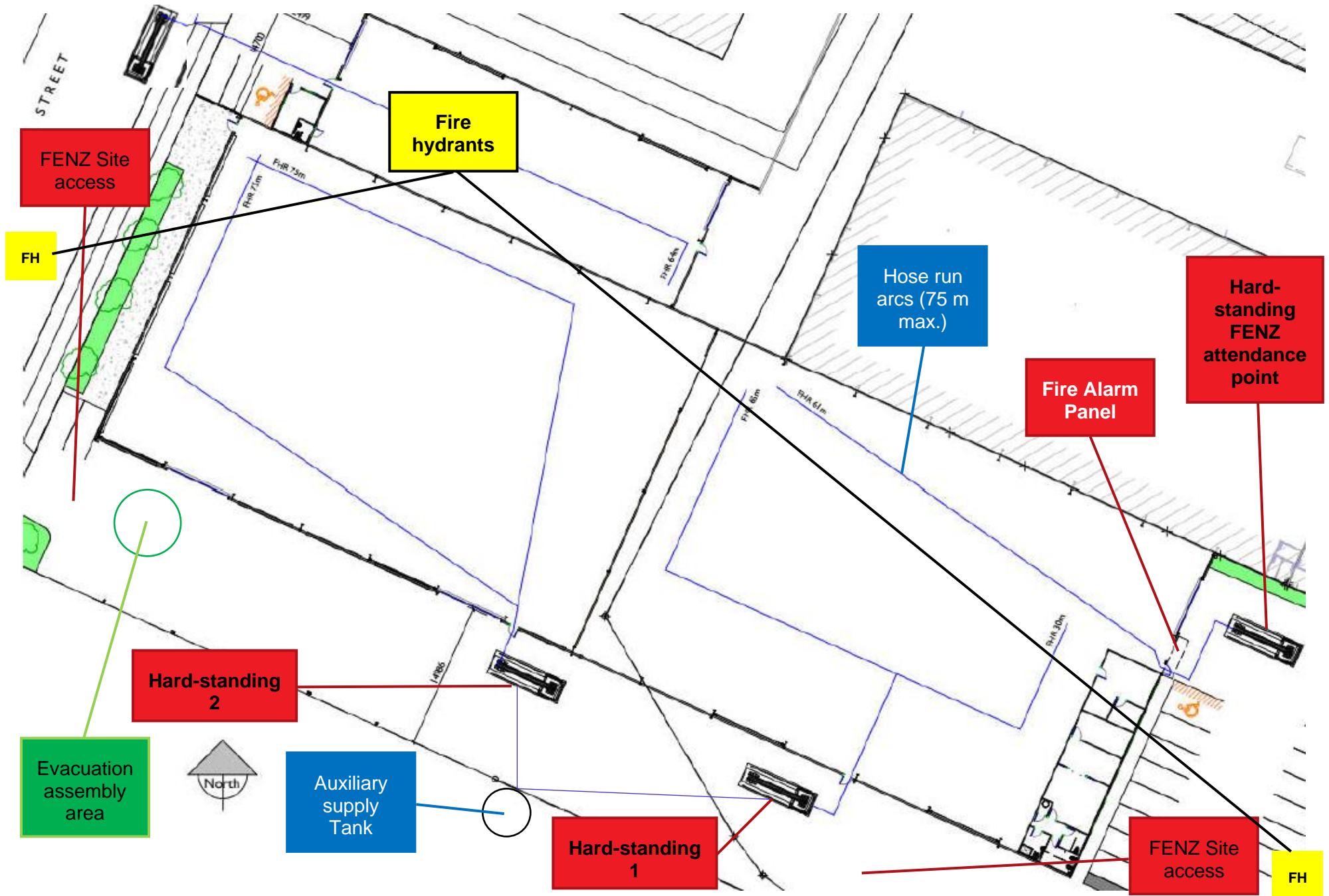


### Aerial appliances

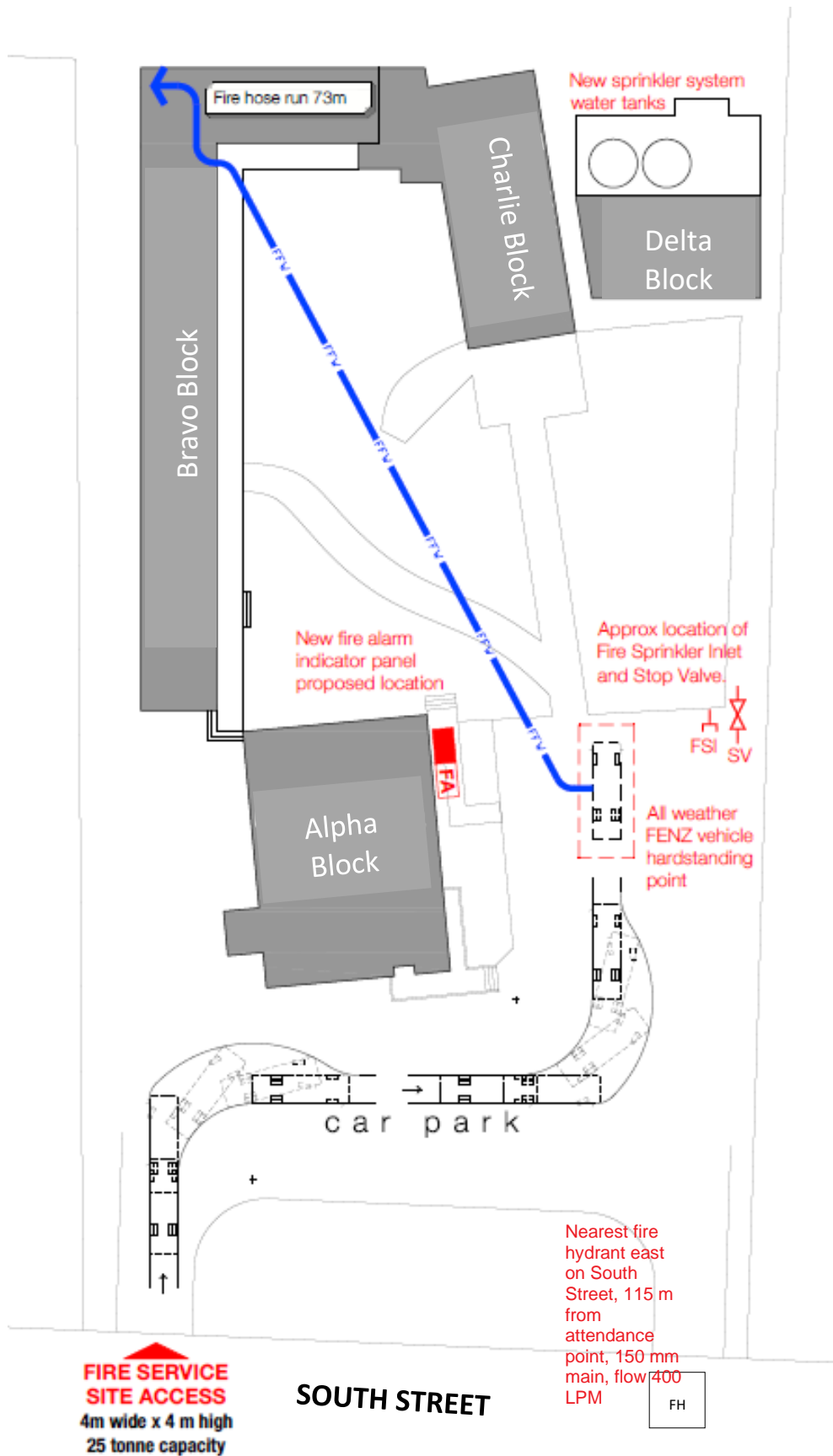




# Appendix B – Site layout examples







**Document information**

Owner	National Manager Response Capability
Last reviewed	10 December 2021
Review period	Every second year

**Record of amendments**

Date	Brief description of amendment
December 2021	Format update and SME content review
March 2018	Initial version

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Monday, 16 May 2022 4:47:43 pm

---

## Submitter details

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**City:** Wellington  
**Phone:** 0272828612  
**Email:** [clairemacnz@gmail.com](mailto:clairemacnz@gmail.com)

## Application details

**Applicant name:** Ryman Healthcare Ltd  
**Site address:** 37 Campbell Street  
**Service request number:** SR471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

**Aspects of the application that you support or oppose:**  
Allocation of Parking on site for owners, visitors, staff and deliveries

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**  
Adverse effects on residents parking and wider traffic effects

**The decision I / we would like Wellington City Council to make is:**  
Allocation of residents only parking zones  
eg Cargill Street

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Monday, 16 May 2022 5:19:13 pm

---

## Submitter details

**First name:** R & C  
**Last name:** Blair  
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**Suburb:** Karori  
**City:** Wellington  
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## Application details

**Applicant name:** Ryman Healthcare Ltd  
**Site address:** 37 Campbell Street  
**Service request number:** SR471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:** I / we will consider presenting a joint case with them at the hearing

### Aspects of the application that you support or oppose:

Oppose sun shading effects on neighbouring properties as a result of the additional height (exceeds permitted activity standards)

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

The overall level of shading is more than minor on existing properties and also when considering the future intensified environment (RMA Enabling and Amendment Act). The effects of sun shading as a result of the development could have been mitigated by an alternative design where any increase in the Height permitted activity standards could have been located more centrally within this site.

### The decision I / we would like Wellington City Council to make is:

Not allow the height of the independent living units (especially the one adjacent to Campbell Street) to be over the permitted height.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Monday, 16 May 2022 4:51:56 pm

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## Submitter details

**First name:** Margaret  
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**Address:** 2 Kate Way, Karori  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 0277369700  
**Email:** mmaclaren@xtra.co.nz

## Application details

**Applicant name:** Ryman Healthcare  
**Site address:** 26 Donald Street  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

**Aspects of the application that you support or oppose:**  
Support a Ryman Healthcare facility being built on the old teachers college in Karori

**Aspects of the application that you are neutral towards:**  
Support a Ryman Healthcare facility being built on the old teachers college in Karori

**The reasons for my / our submission are:**  
Think it is too big a development and will put a strain on Karori infrastructure. Also believe there is insufficient parking in the facility for staff - only 13 if I read submission correctly.  
More open space for community use would be lovely.

**The decision I / we would like Wellington City Council to make is:**  
Think the size should be reduced by one third and more parking for staff included within site. More open space for community use

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Monday, 16 May 2022 5:39:07 pm

---

## Submitter details

**First name:** Richard  
**Last name:** Brandon  
**Address:** 23 Scapa Terrace  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0275776995  
**Email:** richard.kristin@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I support residential intensification and the use of the old Teachers College site for a retirement village however I oppose the proposed Ryman development for the following reasons:

- The over-bearing nature of the buildings
- Impacts on an already under pressure infrastructure system in Karori, including 3-waters, traffic, and public transport.
- Building design and scale not consistent with WCC Residential Design Guide.
- Parking impacts.
- Noise impacts (during construction).
- Traffic, particularly during construction.

### Aspects of the application that you are neutral towards:

#### The reasons for my / our submission are:

The development is over-bearing and out of character with the area

- I live on Scapa Terrace and I believe the proposed buildings will disproportionately dominate the local area.
- Our family spends a lot of time in and around the streets of Karori, and this will transform this part of the suburb from one of a green and reasonably open suburb to one much more closed in.
- As far as we can tell, there will be an element of shading cast on our house at certain times of the year, particularly in winter, when even a small reduction of sub can seem significant.
- I don't believe that large buildings like those proposed by Ryman can be considered a positive effect as contended by Ryman.

- The buildings, some of which will be up to 7 stories high do not correspond with the scale, character and amenity of the Karori streets and nearby properties.

#### Infrastructure

- I have previously been involved in the Karori Association and more recently been a member of the RDK Incorporated Society. The troubles with the Wellington city infrastructure is well known and been a point of contention for local residents for years. I recall from my time on the Karori Association that WCC excluded the suburb from the zoning and height changes, because of the constraints that further development would cause. WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification. The Ryman development is exactly the sort of development which will be especially problematic for the suburb.
- I have seen no meaningful explanation of how this will be addressed as part of the development, particularly in regards to wastewater and sewage drainage.
- There is already a significant amount of smaller scale infill development in Karori that must already be placing additional strain on the infrastructure. At which point does it become too much?

#### Carparking and traffic

- The analysis completed by RDK is that of the 39 carparks available to staff and visitors, 3 are set aside for accessible parking and 2 for the village's vans, leaving a total of 34 available for staff and visitors. My understanding is that Ryman have said that 25 carparks are allocated for staff use, which leaves only nine (9) carparks available for visitors to the site.
- Through my day job as a lawyer with a large practice in Elder Law, I regularly have occasion to visit clients at other villages, some of which are operated by Ryman, including Malvina Major, Bob Scott and others. My experience is attempting to park in the visitor parking is terrible. I have not been able to find a carpark even once when visiting Malvina Major, and I believe Ryman place reliance on the availability of on-street parking to remove the obligation on them to provide for visitors. The same is true at Bob Scott, except on one occasion I was able to find a carpark, but that most suited for a very small car. Again, Bob Scott appears to place reliance on nearby community facilities such as the Wellington Football parking, or other public parking some distance away. In Karori, that will place pressure on the surrounding streets, the public parking at the local pool, and outside Ben Burn Park.
- This number of carparks is completely inadequate for a village of this size. The neighbouring streets will become clogged with cars from Ryman's visitors and staff.
- I live in Scapa Terrace and I am very concerned of the effect that this will have on my property, as well as the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School and Donald Street pre-school.
- I am also very concerned by the amount of traffic that will be generated by the development and the impacts that this will have on the safety of our streets and in particular the safety of children around the local school, kindergartens and pre-schools. The amount of traffic will be increased significantly, which is a significant concern with so many youth facilities nearby.

#### Construction effects

- I am concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honour their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.
- I am concerned by noise generated during construction. My wife and I regularly work from home and the effect of 5 years of construction noise will be significant on our day to day life.
- 4-5 years of continuous construction traffic on our narrow residential streets will be

extremely disruptive and dangerous particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood centres.

- I am also concerned by the effects of ground movement from excavation and piling on

CONCLUSION

I want to be clear that I do support residential intensification and the use of the old Teachers College site for a retirement village. I have an elderly mother whom I believe this sort of facility would be ideally placed. However I oppose the proposed Ryman development in particular for the size, scale and intensity of the project as currently envisioned and the inevitable impacts a development of this scale will have on the local community.

**The decision I / we would like Wellington City Council to make is:**

I request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours more thoroughly and prepare a new plan that is at an appropriate scale and character for the neighbourhood.



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 26 Donald Street and 37 Campbell Street, Karori  
**Date:** Monday, 16 May 2022 9:40:38 pm

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## Submitter details

**First name:** John  
**Last name:** Eyles  
**Address:** 38 Campbell Street, Karori  
**Suburb:** Wellington  
**City:** Wellington  
**Phone:** 0212323617  
**Email:** grandpoobahnz@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** 26 Donald Street and 37 Campbell Street, Karori  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:** 10  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

1. Increased traffic and loss of parking. My house is directly opposite the development in Campbell Street. We need to understand how often and where construction traffic will enter and exit the site, especially during the heavy earthworks stage. There will be noise, vibration and safety impacts of increased traffic during construction, how will these be mitigated?
2. Shading. I understand that my house will be shaded by the tall buildings in the proposed development. This is not acceptable to us at 38 Campbell Street as it will prevent us from enjoying our property to the full at all times in the day at all times of the year. Proposed buildings should be reduced in height and moved back further from boundaries to eliminate shading. This will give more opportunities for landscaping.
3. Privacy. The tall buildings opposite 38 Campbell Street overlook my property. Residents will be able to overlook my property which will reduce our privacy and the enjoyment of our property. I frequently sunbathe in the privacy of my front yard which I will not be able to do if the tall buildings are constructed as proposed. The buildings need to be reduced in height and set back further from the boundaries to reduce overlooking opportunities.
4. Outlook. Our current outlook towards the existing site is over Teachers' College park and the cricket nets, both amenities which have been frequently used by my family over many years. The visual outlook over the proposed site is at tall and ugly buildings. Suggested mitigation includes reducing building height, increasing setback from the boundary and increasing landscaping opportunities along the Campbell Street boundary.
5. Infrastructure, general - I note that the assessment of services completed by Wellington Water references a version of the RSWS that is out of date. The latest version of the RSWS was issued in December 2021. The 3 waters servicing needs to be reassessed using the

latest version of the RSWS. Particularly the clauses relating to water and firefighting supply, building over public water, SW and WW mains and building near to public mains and services.

6. Infrastructure - Sewer. The proposed development will significantly increase peak wastewater flows to the trunk network and the Western treatment plant. This will increase the frequency of the wet weather overflow discharges from the Western Treatment Plant and wet weather overflows to land from the trunk network. I understand that Karori's wastewater and stormwater infrastructure is dated and has insufficient capacity. I believe wastewater mitigation is required and should not be left to the Engineering approval stage. It is the public's interest to understand how sewage storage will operate, how it will be controlled and the mechanism for the release of stored effluent back into the public system. What are the additional risks? Will any sort of treatment be applied to minimise odour and corrosion? Will the asset be publicly or privately owned and operated? Again, it is not good enough to say that these important matters will be addressed during detailed design and Engineering approval. These important matters should be designed and fully understood prior to granting consent.

7. Timeframe for construction. We do not want the pain of construction to drag on for years. Our preference would be for a published construction programme to be part of any building consent with provision for liquidated damages paid to affected residents (such as us) should the developer delay or procrastinate.

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**

I am an affected party.

**The decision I / we would like Wellington City Council to make is:**

1. Shading/loss of privacy/outlook. Impose greater setback of buildings from the boundary on Campbell Street. Reduce height of buildings.
2. Infrastructure general. Have Wellington Water reassess the 3 waters servicing according to the new version of the RSWS, dated December 2021. Have the applicant reassess the proposed 3 waters servicing based on the results of the reassessment.
3. Infrastructure Sewer. Require wastewater mitigation to reduce the frequency of the wet weather overflow discharges from the Western Treatment Plant and wet weather overflows to land from the trunk network. Refer Aspects statements for detail.
4. Limit construction time to 2 years maximum. Our preference would be for a published construction programme to be part of any building consent with provision for liquidated damages paid to affected residents (such as us) should the developer delay or procrastinate.

## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

Andrew and Julie Cooper oppose the application.

### Submitter Details

Name of submitter: Andrew and Julie Cooper  
Address of submitter: 49 Campbell Street, Karori  
Mobile: 0275 395 395  
Email: [andrew@cooperassociates.co.nz](mailto:andrew@cooperassociates.co.nz)

## SUBMISSION STATEMENTS

We support residential intensification and the use of the old Teachers College site for a retirement village however we oppose the proposed Ryman development for the following reasons:

- Over-bearance of buildings and visual effects
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Loss of privacy and enjoyment of our property
- Shading effects on our property
- Noise impacts on our property
- Wind effects on our property
- Construction effects on our property
- Traffic and parking impacts
- Impacts on constrained infrastructure in Karori
- Lack of consultation by Ryman.

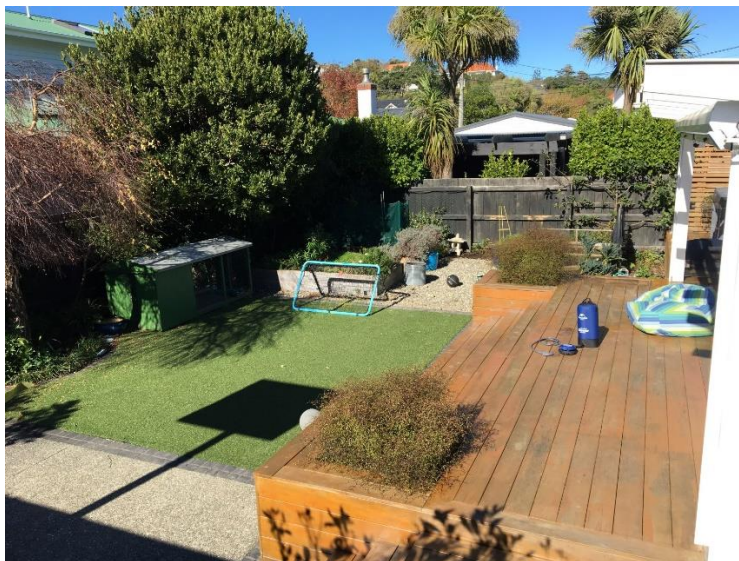
## OUR REASONS FOR OPPOSING THE DEVELOPMENT

### Over-bearing and out of character buildings and visual effects

- We live at 49 Campbell St immediately adjacent to proposed buildings B02 and B03.
- The size of the proposed buildings at 3-stories high, 19m wide and 70m long will completely dominate the outlook from our master bedroom, primary living area and backyard. The development will have material adverse visual effects on our property.
- Our family spends most of our time in the living area and backyard that will be overshadowed by the new buildings, resulting in loss of privacy and enjoyment of our own property.
- Our skyline will be materially obstructed and we stand to lose significant sunlight from the shading effects of the new buildings.
- Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.
- Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.
- Suggesting that the over-bearing of the proposed buildings will be mitigated by planting is disingenuous. Trees that are big enough to disguise the proposed buildings will take years to grow and will then generate even more shading on our property. The need by Ryman to plant trees that grow to 20-30m to mitigate the effects of the proposed buildings, highlights the inappropriateness of the building scale.
- We consider that McIndoe Urban's assessment of minor visual dominance effects to be completely inaccurate.
- McIndoe Urban accurately states that "as 2 story dwellings, both 49 Campbell Street and 24 Scapa Terrace will experience a significant change to their northern upper-level outlook. Their upper level outlook will change from an open grassed area to the Proposed Village. The bulk and scale of Buildings B02 and B03 will be greater than that which generally occurs in the surrounding area."
- However, McIndoe Urban then incorrectly conclude that recognition of the Site as a windfall site, and therefore a higher level of development density on the Site can be expected, shifts the "significant" change to a minor one.
- Whilst the site may be windfall, Residential Area Policy 4.2.1.5 caveats provided that it does not detract from the character and amenity of the neighbourhood in which it is located. This development clearly detracts from the neighbourhood due to its bulk, scale and lack of coherence to the neighbouring residential dwellings. Consequently, McIndoe Urban's reliance on windfall status incorrectly categorises the visual impact on our property, and indeed all surrounding properties, as minor is incorrect.
- The adverse visual impact on our property is severe.
- Note that no consultant that has contributed to the assessment reports visited our property to assess the actual impact that the development will have.

### **Loss of privacy and enjoyment of our property**

- The images below provide examples of our property and how we use it. The proposed buildings will look over our backyard and into our living area, completely detracting from our enjoyment of this sunny and private space.
- We are particularly concerned by the positioning of the apartment patios between buildings B01 and B02 and the views that residents will have into our bedroom, living area and outside area.







Master bedroom – 2nd-story



### **Shading effects on our property**

- The shading diagrams and summary tables illustrate significant shading effects on our property for extended periods.
- McIndoe Urban concludes that shading effects on our property will be “less than minor”. However they describe the shading effects as follows:
  - This property however receives considerable shade onto its north facing (side) façade except for a short period in the morning (09:15 - 09:45am) though the significant ground floor windows (photo below) occur to the eastern end of the north façade and are free from shade until 11am. The east-facing (rear) façade receives 4+hours of sun and appears to be the primary façade opening onto the rear garden.

- At present, our property receives full sun year round. This compares to 4+ hours at the rear of our property, until 11am on the eastern end of our north façade (our main kitchen/living area) and half an hour of sub on the rest of our north facing façade.
- This change represents a more than minor effect on our shading.



- The shading illustrations in the application include a red line indicating “shading from buildings built to residential building standards.” The red line is inaccurate and disingenuous. Buildings built to the residential building standards would not be the continuous mass that Ryman’s proposed development will be. Buildings built to the residential building standards would not have the same site coverage, would include a range of roof profiles and would be represented by more stand-alone buildings. In this way buildings built to the residential building standards would provide interspersed shading effects rather than a single solid mass of shading that the Ryman development will impose on us and our neighbours.
- We remain further concerned that the future very large trees proposed to be planted on the boundary, will when mature, shade our property even more than the very large buildings will. The requirement for such tall trees would not be necessary if buildings B02-B06 were within the permitted building heights and were of a scale more considerate to the residential environment in which they are placed.
- The following images demonstrate the sun received within our main living area during winter (August 4pm) that will be lost as a result of the proposed development.





### **Noise impacts on our property**

- We are very concerned by the noise of multiple car movements and tyre squeal from the undercroft carparking that will be immediately adjacent to our property.
- We are also concerned that the secure garage door on the Campbell Street entrance to the undercroft carpark will have an audible warning alarm when opening and closing. Such an alarm will result in frequent audible disturbance to our property.
- The effect of noise from car movements, tyre squeal and the garage door alarm will be more than minor on our property.
- We expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal, that the southern façade of the undercroft carparking comprises suitable noise attenuating materials and that the garage doors are not to be fitted with an audible alarm system when opening and closing.

### **Wind effects on our property**

- Karori is windy, with the Teachers' College site sitting directly in the path of the prevailing wind which is exacerbated by the low saddle directly to the north of the site.
- We are very concerned that the height, length, rectangular shape and north-south orientation of nearly every building in the development will generate increased wind effects on our property
- Ryman's only mitigation appears to be planting which will take years to take effect.
- The wind assessment peer review concludes that not enough has been done to mitigate the effects of excessive wind generated by the development.

### **Construction effects on our property**

- We are very concerned by dust that will be generated from construction, particularly given the windiness of the site.
- We request that Ryman honour their original offer to neighbours who are impacted by the development to have their houses washed periodically during the construction phase.
- We are also very concerned by noise generated during construction. We both work from home and the effect of 4-5 years of construction noise will be extremely detrimental to our combined working and home life, as it will if construction is allowed to occur during weekends.
- We are also concerned by the effects of ground movement that excavation and piling will have on our property.
- We request that Ryman honour their original offer to neighbours who are impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

### **Carparking and traffic**

- Of the 39 carparks available to staff and visitors, 3 are set aside for accessible parking and 2 for the village's vans, leaving a total of 34 available for staff and visitors.
- The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. This leaves just nine (9) carparks available for visitors to the site.
- This number of carparks is completely inadequate for a village of this size. The neighbouring streets will become clogged with cars from Ryman's visitors and staff.
- We live in Campbell St and we are very concerned of the effect that this will have on access to my property.
- We are also concerned at the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School and Donald Street pre-school due to the spillover of carparking that will inevitably happen due to the lack of on-site parking provided by Ryman.
- We are very concerned by the amount of traffic that will be generated by the development and the impacts that this will have on the safety of our streets and in particular the safety of children around the local school, kindergartens and pre-schools.
- We are concerned at the risk to the community that 4-5 years of continuous construction traffic on our narrow residential streets. Such traffic will be extremely disruptive and dangerous, particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood centres.
- The streets around the neighbourhood are extremely busy with school children between 8.30-9am and 3-3.30pm. Construction traffic should be prohibited from any movements on the streets surrounding the site at these times.

### **Infrastructure constraints**

- WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit.
- This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification.
- Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater.
- The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale. There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community.
- Comparisons have been made between peak flows of the proposed village and peak flows from the old Teachers' College. The Teachers' College has not been at full occupancy for at least a decade. Karori's population has grown since that time,

therefore the comparison is meaningless. Comparison should be made between the peak load of the retirement village (on the basis of independently verified data) and peak loading from the rest of the neighbourhood, but also the sustained impact of the load from the village 24/7, 365 days on the downstream pipe network and the constrained WWTP, particularly during times of rainfall.

- We are concerned that the consent application does not include mitigations for the impact of the high levels of wastewater from this site. Deferring possible mitigations until the Engineering Approval stages is unacceptable. Without mitigation, there will be inevitable extra pollution of the Karori Stream and associated waterways from this development. This is an unacceptable outcome.

### **Lack of consultation with the community**

- In section 6.1 of the AEE, Ryman falsely state that “neighbours to the Site have mostly come around to our proposal due to design changes such as removing basements from Buildings B02-B06, additional planting along the boundary where possible and refined designs of the buildings.” From our own perspective, while the proposed changes are very slight improvements on the original design, we have in no way ‘come around’ to Ryman’s revised proposal as it has not addressed the fundamental problem of a proposed village that is completely out of scale with the residential community that it will part of and the consequence adverse effects that this will have on the community and the environment.
- Ryman describe their efforts at consultation with the community. We attended the two or three open days that Ryman offered over the past 3 years and felt in no way that there were opportunities for consultation. Ryman simply presented plans to those in attendance and offered only defensive responses when questioned about the adverse effects of the development.
- Ryman visited our property once during this time for a one-on-one meeting. Again, this was to present plans rather than undertake meaningful consultation. There was no follow-up and no further outreach to ourselves or our neighbours.
- Ryman is correct that “most groups are comfortable or excited for Ryman to construct a village due to the opportunity for intergenerational relationships and the addition of a community amenity”. We count ourselves amongst that group, however not at the scale of the proposed village and the very adverse effects that the village will have on the community.
- A retirement village on the old Teachers’ College site within a design that is consistent and integrated with the neighbouring community will be a fantastic asset to Karori and a great use of the site. What Ryman are proposing does not achieve that outcome.
- We expect that for a re-designed de-scaled village, Ryman will be required to meaningfully consult with the community.

### **CONCLUSION**

The effects of Ryman’s proposed development will have substantially more than minor effects on our property and our enjoyment of our property. In particular, the over-bearance

of 3 story, 19m wide, 70m long 'barrack' style apartment blocks that will have a severe adverse visual effect on our property and will result in adverse shading and loss of privacy.

Our other material concerns relate to the noise of the garaging immediately adjacent to our property, impact on traffic and parking on the surrounding residential streets, and the distortionary effects on wind from the funneling effects of the buildings' design.

The sheer scale of the development will result in a multi-year construction project with consequent multi-year disruption from dust, noise, traffic and earth movements.

As a non-complying activity, Ryman must offer a design that has no more than minor adverse effects on the environment and the community. As described in our submission, the effects on our property from Ryman's proposal are substantially more than minor, as they are on the wider community and the environment. For this reason, WCC is bound to decline Ryman's application.

#### **THE DECISION WE WOULD LIKE WCC TO MAKE IS:**

We request that WCC reject Ryman's application due to the more than minor effects that this development will have on our property and the deleterious effects that a development of this scale will have on the surrounding neighbourhood.

We request that WCC require Ryman to appropriately consult with its neighbours and to prepare a new plan that is at an appropriate scale and character for the neighbourhood without the adverse impacts on the environment that the current proposal will impose.

#### **DELEGATION**

We understand that as a publicly notified consent, the application will be considered by an independent commissioner. Consequently, we do not offer a preference on whether, pursuant to section 100A of the Act, WCC delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

#### **ORAL SUBMISSION**

We wish to speak in support of our submission.

#### **CORRESPONDENCE**

Please serve correspondence to us by email.

#### **SIGNATURE**



Andrew & Julie Cooper  
16 May 2021

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

Use this form to make a submission on a resource consent application you support or oppose. You can also make a submission online, visit [wellington.govt.nz/have-your-say/public-notice](http://wellington.govt.nz/have-your-say/public-notice).

If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents  
Wellington City Council  
PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant:

Site address:

Proposal:

Service request number:

Support the application

Oppose the application

Neutral

## Submitter details

Name of submitter:

Address of submitter:

Phone (*day*):

Mobile:

Email:

## Submission statements *(use additional pages if required)*

The aspects of the application that I support/oppose are:

**The reasons for my submission are:**

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

**Note: \*Select one.**

I request/ do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

I/we wish to speak in support of the submission  
I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

*Richard Leikis*

Date

**Note:**

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
- This is not a statutory form, but is provided as a guide to people wishing to lodge a submission.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it contains offensive language
- it discloses no reasonable or relevant case
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further

**Privacy information**

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified resource consent process. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

**How do you wish to be served with any correspondence**

via email (please ensure you have provided your email address on page 1)

via post, ie hardcopy

## Submission on resource consent application 471670

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

I oppose the application.

### Submitter Details

Name of submitter: Richard Leikis  
Address of submitter: 20 Scapa Terrace, Karori, Wellington  
Mobile: 021 656107  
Email: vcrleikis@gmail.com

### SUBMISSION STATEMENTS

I oppose the current design of the Ryman Retirement village proposed for 26 Donald Street in Karori for a number of reasons, including the sheer scale and negative impact it will have on the suburb and the rate payers of Wellington. I also oppose the design of this development for the significant impact it will have on my family, our house health, our personal health, outdoor and indoor use of our property and our general enjoyment of the surrounds.

At a high level

- **Shading:** my family will go from a “No shade from existing property (Teachers College) exists” to “0.75 hours of sunlight at the equinox”.
- **Privacy:** this development opens up an elevated aerial view into my living space, bedrooms, and outdoor living space to a large number of apartment residents. No mitigations are in place that have been deemed essential for other properties.
- **Flooding and drainage:** I have not been able to identify sufficient designs to assess the impact of stormwater drainage from the Southern boundary of the site. In particular ground level of “scruffy dome” and secondary overflow.
- **Construction impacts:** excavation on sedimentary soils and impact to our house in terms of movement, dust impacts, noise impacts, etc. I can’t find any mitigations to maintain waste and storm water flows should damage or blockages occur during construction or the 1-in-100-year flood. This is a single point of failure for a significant number of residents and water catchment upstream.

And Community impacts

- Ryman’s insular view of their proposal and lack of a comprehensive plan for the immediate block or surrounding areas
- **Impact of Infrastructure:** the field and open channels regularly flood today. Thankfully the current surfaces and layout allow the area time to absorb and flow away, acknowledging the current poor quality of the Karori stream it does cause.

- **The sheer scale:** in particular buildings B01B that are a massive increase in area and therefore not in keeping with the neighborhood.
- **Traffic:** there is no mitigation for the extra traffic flows outside of the 4 walls of the development
- **Parking:** there is insufficient parking for visitors and staff needs in the neighborhood, especially when changing shifts.

## **BACKGROUND**

- We live at 20 Scapa Terrace – south of this development
- Part of my property will potentially be below the ground level of the neighbouring buildings B02-B06. Hence concern for pooling floodwaters.
- Our living is north-facing and outdoor living is all on the north side. The house has been renovated to utilize the sun.
- According to current design we will have the 3 level B04 block over our back fence, and only planting of small scrubs – 19.5m in width, 11m high plus the increased ground level height. No visual mitigants.
- We currently have all day sunshine summer and winter which heats the house and has a very positive effect on our well-being and standard of living.
- We have been regular users of the Teachers college facilities and the surrounding amenities for 10+ years.
- We have found no useful resources in the submission that reference our property. As the lowest house in the street, I have noticed the negative impact assessments on my more elevated neighbours. I can only assume my place is more severely impacted and suspect Ryman have avoided any assessment for this reason.

## **OUR REASONS FOR OPPOSING THE DEVELOPMENT**

### **Shading to my Property**

- According to the “Updated Urban Design (July 2021)” this development does not meet the RDG guidelines, which I understand to be 4 hours per day (min) for house and 3 hours per day for outdoor living space. The same report states my family will have 0.75 hours of no shading at the equinox. For this reason alone, this current design cannot be approved.
- The same report states, “currently enjoys high level of sunlight” and “no shade from existing property” and then goes on to state “minor adverse impact”. I think any individual without personal gain would assess this as major or significant adverse impact.
- My understanding is that under the planning and urban design rules in place, the developer is obliged to “to avoid or mitigate adverse effects on neighbouring properties” which Ryman have made no effort to do.
- This amount of shading will severely impact our personal amenities. Outside, the shading will affect outdoor living and dining and the children’s playing area (including a trampoline). Safety concerns arise regarding the deck which will become slippery and prone to growing moss and lichen plus be very dangerous with frost which will not clear due to lack of sun. There will be a complete loss of any ability to



dry clothes outside. Growth and health of garden plants will be compromised. Inside our home our lives will be impacted, with shading reducing the warmth and dryness of our home, which along with the physical lack of sunlight will affect our physical and mental health and well-being. The cost of heating the house will increase. Overall happiness and enjoyment of our home will be dramatically reduced.

- Our property is so over-shadowed by the adjacent building that we will not benefit from any view shafts in our living areas.

### **Privacy**

- Ryman have made no effort to mitigate residents' view into my living area, bedroom, and outdoor living space under the current design.
- Full size windows in the living area of some apartments directly look into our home (B03, B04, and B05).
- In their privacy effects assessments, Ryman have only assessed some properties on Scapa Terrace, and have only represented views from the adjacent apartment. Clearly some peripheral vision from a balcony further up an apartment block can view into our home as well but this does not seem to have been reported on.
- Also noting the 7 levels of residents in block B01B south, that all face towards our property - it is a small distance away but still more eyes into our bedroom and living space.
- Mitigants that appear necessary on the southern boundary to Scapa Terrace, i.e., planting of trees, have not been able to be accommodated adjacent to properties 16, 18, 20, 22 Scapa Terrace. Therefore, no mitigation, and reason to reject the current design proposal.
- Elevated balconies between apartment blocks, on level 1, will have 1.5 metre planter boxes to create privacy. This does not seem realistic to me as wind will funnel down these spaces. These are not high enough to provide adequate privacy to our property.
- Reducing the apartment blocks B02-B06 to 2 levels will enhance living amenities for both residents within the facility as well as residents in the close surrounds of the site.
- I'd also suggest Ryman make some effort to mitigate the failures in design obligations such as:
  - o small high windows above resident sight lines on all southern boundary apartments,
  - o opaque walls on southern side of all balconies to increase privacy for residents and partially for neighbours of the site,
  - o increase setback from the southern boundary adjacent to 16, 18, 20, 22 Scapa Terrace to accommodate stormwater and flooding needs, as well as planting of tall trees close to the apartments to provide some form of mitigation of the visual impacts (which has been highlighted as important and necessary for all other neighbours).

### **Flooding and Drainage – Stormwater**

- As I currently read the design, the large chunk of area south of the site is reliant on the single stormwater pipe that flows from Scapa through the site and out to

Campbell Street. What are the secondary flows should this block up both during construction (assuming it to be a more likely time for accidental blockages) and once the site is completed? Any blockage will potentially flood 16, 18, 20, 17, 19, and 21 Scapa Terrace.

- I can't locate any overland flows diagrams/designs and the appropriate ground level readings of the new development and its alignment with existing adjoining ground levels – will the council do a complete assessment of this before any approval is given? I believe this assessment is needed to give the council confidence they have set the ground level at a height that won't cause new flooding and water retention for neighbours.
- Am I missing a Stormwater management design – I would have thought this is critical for a council-identified floodplain?
- Does it have engineering approval and independent assessment?
- What level is the scruffy dome going to be on the southern boundary?
- In the vacant land on the southern boundary what controls are in place to prevent waterflow south and down to neighboring properties?
- Will there be drainage to capture water hitting the bulk surface of the southern garage and apartment walls?
- What is preventing overland water flowing from Donald Street moving towards the scruffy dome and inundating its capacity?
- Point 15 of the Wellington Water Consent Conditions (Nov 2020) states “the proposed construction does not comply with the Regional Standard for Water Services requirement for building/working near public drains – what is this and should it not be addressed before approval is given?”
- Smell – what smell will emanate from the scruffy dome located within metres of our living spaces?
- There is talk of a “weir structure” for overland flow, but no designs or plans found. Due to the higher level of the ground floor to the land around the B04 building and the wish to have a flat floor level (for elderly safety), I believe this “weir structure” design must be agreed as suitable before consent is issued.
- The resource consent refers to 17.5 % reduction in impervious land, and I assume council have appropriately assessed the engineering solution from Ryman. But how do you calculate requirements based on water that falls outside of the site and flows onto the site, e.g., overflow from Donald Street heavy rainfalls and Scapa Terrace properties, swimming pool surrounds, and water that falls on existing impervious surfaces but flows into the uncontrolled stream.

### **Construction Impacts**

- I can see no controls or mitigation in place to address ground movement to the Scapa Terrace residents. Excavation will occur on our boundary for stormwater replacement pipes and a few metres away for building construction. Should Ryman not be able to proceed until they have an understanding of soil types and potential impacts to existing buildings?
- I would expect some form of INDEPENDENT baseline assessment and periodic review (say quarterly) for ground movement.

- I would expect to see controls and mitigations in place to protect the function of existing stormwater and wastewater infrastructure during construction given the significant impact it could have upstream and downstream of the construction zone.
- I would expect to see controls and mitigations in place for heavy rain events during construction.

### **Consultation**

- I think it is disingenuous of Ryman to talk about the amount of consultation they have made. For example:
  - o Not immediately making the resource consent publicly notifiable, but publicly saying they would.
  - o Using drop-in days as “consultation”, but clearly set up for sales.
  - o No information to take away or allowed to photograph at drop-in days.
  - o One-on-one visits were advice of their plans, no feedback was taken or asked for. Their action item was ticked off.
  - o Buildings were demolished before the council could make any real assessment of the building value to the neighborhood and to New Zealand.
  - o Applying for first resource consent at the start of a global pandemic and New Zealand lockdown.
  - o Sticking to minimal timeframes for the public notification process when there is clearly a significant amount of material to digest and process.

### **Comprehensive Area Plan**

- I would expect the council to push Ryman into showing some leadership and solutions to the impacts in the wider area. They have the experience with resident behavior, with construction worker behavior, and dealing with other councils who will have had the same issues when construction is in a densely populated area. Or have they shared this information, but the council can't share it?
- The area is obviously a safety sensitive zone for young children and in the future more elderly people.
- I don't believe the council can approve this proposal until safety issues in the surrounding area have been addressed. In particular:
  - o Road crossing at 4 points in northern Campbell Street
  - o Road crossing on Scapa Terrace at Donald Street end
  - o Vehicle flow on Northern Donald Street
  - o Vehicles exiting Campbell Street to Karori road
  - o Cooper street pedestrian traffic crossing near Donald Street
  - o Pedestrian safety in the Donald, Gipps, and Firth Street area
- I'm mentioning this as there are high volumes of children in these areas, and significant speed areas for cars, children on scooters, as well as pedestrian visibility issues in my mind.

### **Infrastructure and Scale**

- My understanding is the current height limit is 8m for Outer Residential. WCC has not changed this for the area or for wider Karori because we don't have the infrastructure to cope with this scale of 400 plus residents 24x7, staff, service providers, and visitors.

- I do believe a smaller scale development for elderly is suitable for this site due to the same reasons Ryman has put forward, but this is a money-driven design to maximise the space without considering the wider impacts on the suburb and the Wellington Ratepayers. Or the neighbours.
- Seven level buildings are well out of character for the neighborhood. While there is precedence with the previous Teachers College, they were narrower and allowed for view shafts and light between them. This design, especially the B01B building, is solid and blocks everything.
- This complex will have 24 x7 residents looking into surrounding properties, using the infrastructure, and clogging our roads. It is in no way fair to compare with a Teachers College where the majority of visitors were 9-3pm (not during peak), 26 weeks or less a year, with a few tutors and lecturers (using onsite parking) there for longer, perhaps a maximum of 46 weeks a year.
- To claim the 7 level B01B south building, as like for like is incorrect and misrepresented. It is taking the place of a 2-level gymnasium and extending significantly further into the middle of the site. This certainly closes in the site and building to the neighbours and is not in keeping with the Teachers College design, which was set back into the hill slope, surrounded by well-established trees.

### **Traffic and Parking**

- What will be done to address parking at Karori pool?
- What will be done to provide construction staff parking or transportation to reduce the impacts?
- Will the council consider providing residents' parking?
- Will the council address traffic flow so it can go two ways on northern Donald Street?
- Will the council invest in traffic light improvements to allow for the change in traffic flow during construction and again once occupied?
- Will the council look to improve the bus service to allow for change in user patterns?
- What will the council do to improve cycle safety in the area, particularly Karori road from Karori shops through the Marsden shopping Centre.

### **Wind Impacts**

- The report states "not enough has been done to mitigate wind impacts" – will the council address this before going any further?
- There is suggestion that established tree planting will mitigate this, I'm assuming this is in 15-20 years' time. And there is no substantial tree planting on the corridors that open to my property. i.e. no effort to mitigate wind in windy Wellington.

### **CONCLUSION**

Clearly Ryman have not done enough for this proposal to proceed as is. I feel they have been too greedy with the return on their original investment and tried to cram too many properties/people into the site without considering the impacts on the community outside of their 4 walls.

The impact to myself, which will not be dis-similar to many neighbouring properties is significant and to suggest otherwise is insulting or arrogant.

I request the council decline the proposal from Ryman in its current form and ask them to take into account planning and design guidelines set out by the Wellington City Council.

- I will lose all sun through winter.
- I will have potentially 100+ eyes with views into my bedroom, living area, and outdoor living area.
- There is not enough information about stormwater and secondary flows across the site.
- Karori stormwater and wastewater will not cope.
- Traffic will get worse, potentially bringing Karori to a standstill and preventing emergency services doing their job.
- A child or elderly citizen will be hit by a vehicle in the area if safety is not addressed.

Richard Leikis & Vanessa Porter  
20 Scapa Terrace, Karori

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Monday, 16 May 2022 10:47:39 pm

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## Submitter details

**First name:** Clinton  
**Last name:** Moran  
**Address:** 16 Scapa Terrace  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0274670260  
**Email:** clint\_bol@hotmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:** 5 minutes  
**If others make a similar submission:** I / we will consider presenting a joint case with them at the hearing

### Aspects of the application that you support or oppose:

Oppose:

- Urban design assessment particularly in regards to 16 Scapa Terrace.
- Scale of the proposed development (over-bearing and out of character and covering high percentage of land area).
- Shading impacts
- Construction impacts - dust, noise, ground movement.
- Traffic impacts
- Wind impacts
- Proposed onsite parking inadequate

### Aspects of the application that you are neutral towards:

Other aspects

### The reasons for my / our submission are:

- The Teachers' College site is a floodplain. With the loss of the playing fields that acted as a soak pit, the increase in hard surfacing on the site, the poor state of Wellington's water infrastructure, I am concerned about the effects that high rainfall events will have on my property in Scapa Tce.
- I live on Scapa Terrace and the size of the proposed buildings will completely dominate the outlook from my backyard.
- Our family spends most of our time in the backyard or backyard (north facing) rooms of the house which include lounge, kitchen and dining areas including an outdoor deck and the over-dominance of the buildings will result in loss of privacy and enjoyment of our own property.
- We stand to lose significant sunlight from the shading effects of the new buildings over winter months where the McIndoe Urban report included in the application currently acknowledges 'Shade from former or existing Teachers College buildings does not fall on

the property. We currently grow vegetables and fruits in our backyard year round and stand to lose this capability.

- Suggesting that the over-bearing of the proposed buildings will be mitigated by planting is insulting. Trees that are big enough to disguise the proposed buildings will take years to grow and will then likely generate even more shading on our property.
- The stretch of boundary with our property cannot be planted due to the presence of critical stormwater infrastructure. This means that the proposed mitigations of tree plantings will not be provided for our property resulting in continued over-bearing and loss of privacy.
- I am very concerned that the height, length, rectangular shape and north-south orientation of nearly every building in the development will generate increased wind effects on our property
- The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. This leaves just nine (9) carparks available for visitors to the site. This number of carparks is completely inadequate for a village of this size.
- The neighbouring streets will become clogged with cars from Ryman's visitors and staff. I live in Scapa Terrace and am very concerned of the effect that this will have on my property, as well as the impacts on Karori Normal School – traffic on rainy days on and around Donald Street already backs up significantly.
- I am concerned by dust generated from construction, particularly given the windiness of the site.
- I am concerned by noise generated during construction. I work from home and the effect of 5 years of construction noise will be devastating mentally/physically.
- I am also concerned by the effects of ground movement from excavation and piling on my property (foundations, plaster ceilings etc.).

**The decision I / we would like Wellington City Council to make is:**

I request that WCC reject Ryman's application due to the effects that a development of this scale will have on my property and the surrounding neighbourhood. Ryman should consult with its neighbours further and prepare a new plan that is at an appropriate scale and character for the neighbourhood and make good to minimise impacts to neighbours. I would like to see conditions of consent imposed that provide more support in mitigating the impacts to my property and other neighbours, particularly with respect to shading, and, the impacts of the construction phase that will run over several years causing significant impact on ability to work from home due to noise, vibrations and dust, noting that my property is 1930's with wooden single glazed windows. This development has my family seriously considering moving and that should not be the case.

# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

Use this form to make a submission on a resource consent application you support or oppose. You can also make a submission online, visit [wellington.govt.nz/have-your-say/public-notice](http://wellington.govt.nz/have-your-say/public-notice).

If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at:

**Resource Consents**  
**Wellington City Council**  
PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: J. Ain

Address of submitter: 6/260 Oriental Pde, Welwyne 6011

Phone (day): 04 801 5458

Mobile:

Email:

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

Ryman Village is very appropriate  
for an aged population.



**The reasons for my submission are:**

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

Please process this application as a  
Special Place.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)* 	Date 27th April 2022
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**Note:**

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
- This is not a statutory form, but is provided as a guide to people wishing to lodge a submission.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**Privacy information**

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified resource consent process. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)
- via post, ie hardcopy

# Submission on resource consent application

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant:	Mitchell Dayash on behalf of Ryman Healthcare Ltd
Site address:	26 Donald Street & 37 Campbell Street, Karori, Wellington
Proposal:	Resource Consent: Land Use- The Construction, Operation & Maintenance of Retirement village
Service request number:	SR471670
<input type="checkbox"/> Support the application <input checked="" type="checkbox"/> Oppose the application <input type="checkbox"/> Neutral	

## Submitter details

Name of submitter:	Jeremy & Debbie Sprott		
Address of submitter:	32 Campbell Street, Karori, Wellington		
Phone (day):	N/A	Mobile:	021 655760
Email:	<a href="mailto:sprott.family@xtra.co.nz">sprott.family@xtra.co.nz</a>		

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

Refer Attached.

**The reasons for my submission are:**

Refer Attached.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

Refer Attached.

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Jeremy Sprott

Digitally signed by Jeremy Sprott  
Date: 2022.05.16 12:04:00 +12'00'

Date

15th May 2022

**Note:**

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
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- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

## Submission on resource consent application

### Submission details

Name of applicant: Mitchell Dayash on behalf Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

### Submitter Details

Name of submitter: Jeremy & Debbie Sprott  
Address of submitter: 32 Campbell Street, Karori, Wellington  
Mobile: 021 655 7609  
Email: sprott.family@xtra.co.nz

### SUBMISSION STATEMENTS

We support residential intensification and the use of the old Teachers College site for a retirement village, however we **oppose** the proposed Ryman development for the following reasons:

- Over-bearing unreasonable site-wide buildings
- Shading effects.
- Loss of privacy and enjoyment of my property
- Impacts on constrained infrastructure in Karori.
- Stormwater and wastewater analysis and limited mitigations.
- Building scale out of character and dominating effect over surrounding residential area.
- Building design and scale not consistent with WCC Residential Design Guide.
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Wind impacts.
- Parking impacts.
- Noise impacts.
- Traffic impacts, particularly during construction.
- Construction impacts – dust, noise, ground movement.

## **OUR REASONS FOR OPPOSING THE DEVELOPMENT**

### **Infrastructure constraints**

- WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit.
- This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification.
- Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater. It is understood the Network grid is full to capacity.
- The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale. There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community.
- Wgtn Water gave a disclosure on the water pipes below ground being up to handling the increased volume.
- The Teachers' College site is a floodplain. With the loss of the open space that acted as a soak pit, the increase in hard surfacing on the site, the poor state of Wellington's water infrastructure, I am concerned about the effects that high rainfall events will have on my property in Campbell Street.

### **Over-bearing (Scale & Mass) and out of character buildings**

- The submitter does not object to the development of a retirement village. We object to the sheer magnitude and scale of the buildings, in mass height and width (horizontal). The building mass and scale of the development and the consequential impacts on the community and infrastructure is not consistent with the clear caveat in Residential Area Policy 4.2.1.5 which states ' Enable residential intensification within the inner and outer residential Areas provided that it does not retract from the character and amenity of the neighborhood in which it is located".
- Ryman admit the proposed buildings will see an overall increase in building mass on the site. To then say "this will reinforce the site as a feature within the urban landscape" is sales speak personified.
- The series of apartment buildings in the southern portion of the site will result in a change in character for an area of the site that has always been an open space for the community. It is understood Teachers College was allowed to build on the site on the caveat there remain open green spaces for the community to use. The proposed plan reduces the open character to closed. Highly populated Central Karori has limited green open spaces.
- The proposed buildings are not achieving an acceptable contextual fit. The balance is not there. The proposed 7 storey BO1B building is dominant and has significant mass

horizontally to dominant the Karori skyline. The inference by Ryman “it is not unreasonable to anticipate a greater intensity of development on the site compares to previous is mis-leading. The Building plan should change to maximum 5 storey for hospital care buildings & maximum 2 storey for apartments.

- The original plan showed 2 storey apartments (BO2-BO7) along the Campbell St boundary and less mass building scale for the taller main buildings. The plans changed to 3 storey apartments & larger buildings when underground car parks in first plan was not possible. Above ground car parks resulted in buildings changes to height and width as the proposal now shows.
- We live on Campbell Street and the size of the proposed buildings (Bo1B & BO2) will completely dominate the outlook from our front 2 storey home (garden/lawn, porch, Living room, & 3 x Bedrooms).
- Our family spends considerable time in front of property and the over-dominance of the buildings with Apartments BO2 directly opposite will result in loss of privacy and enjoyment of our own property.
- The proposal states BO2 Apartments (just over 11m high, 70mtr long, 19m deep complex set back only 5m from street) on Campbell St boundary is 3 storey stepping down to 2 storey at either end. There is a variance! The plans show the 2 storey at the northern end opposite our home does not match the same step down plan as BO3 & southern end step down. Ryman say they have received permission from owner of 33 Campbell St, but noting the ownership is showing as Ryman.
- The proposed heights of the oversized 3 storey apartments do not achieve compatible street interface to the surrounding neighboring residential character homes. The 3 storey is not a height relationship with neighboring residential homes. A major **DOMINANT** effect is clear. The 179 Apartments should be reduced to 2 storey as in original plan.
- Our skyline will be obliterated, and we stand to lose significant sunlight from the shading effects of the new buildings BO2 & BO1B on the front of our home.
- Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.
- Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.
- Suggesting that the over-bearance of the proposed buildings will be mitigated by planting is frankly insulting sales pitch. Trees that are big enough to disguise the proposed buildings will take years to grow, are not suitable varieties and will then likely generate even more shading on our property & apartments! The proposed plans showing the new apartments BO2 with trees and planting at their full size is superficial and mis-leading. Why has Ryman not shown the planting at year 1-5?
- The stretch of boundary with our property cannot be planted due to the presence of critical stormwater infrastructure. This means that the proposed mitigations of tree plantings will not be provided for our property resulting in continued over-bearance and loss of privacy.

### Sun Light Shading Effects

- We are very concerned that the proposed BO1B 7 storey height, length, rectangular shape and north-south orientation of the building in the development will affect the Sun light hours on the front of our property space. This building is significantly bigger in mass at 7 storeys than the former Teacher College Tower.
- We refute Ryman saying “Shading is to be minor or less than minor overall”. Our home will experience adverse shading effect to the front of our home- Living room and 3 bedrooms. WCC regulations suggest ‘Sunlight is to access interior living spaces for 4 hours in mid-winter.
- Ryman proposal says the shading is impact is minor or less than minor for residents’ outdoor space. They have made NO consideration of the house in-door living areas being affected by the site wide building mass of BO1B affecting sunlight, that was not affected to the length of time by the former Teachers College Tower.
- We refute the application page 74, stating on 22<sup>nd</sup> June: No Shading between 8.30am-8.45am. Photos attached for 3<sup>rd</sup> June 2018 shows Teachers College Tower shading the front of our home at 8.40am. The proposed Building BO1B with a significant longer horizontal 7 storey mass will result in up to 30-45 minute longer shading to the front of our property. The facts Ryman state under their shading results impact is minor or less than minor is not correct. It is **MAJOR** shading impact, as this will prevent direct sun entering the living area at the front of our home.

Photos attached taken 3<sup>rd</sup> June 2018 at 8.40am



## Wind

- Karori is windy, with the proposed site sitting directly in the path of the prevailing wind.
- We are very concerned that the height, length, rectangular shape and north-south orientation of nearly every building in the development will generate increased wind effects on our property and surrounding community.
- Ryman's only mitigation appears to be new planting which will take many years to take effect.
- The wind assessment peer review appears to conclude that not enough has been done to mitigate the effects of excessive wind generated by the development.

## Noise & Lighting

- We are concerned by the noise of tyre squealing from the undercroft carparking that will be adjacent to my property.
- We expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal and that the southern façade comprises suitable noise attenuating materials.
- We are concerned about night lights on the proposed pathway entrance opposite our home.

## Carparking and traffic

- Of the 39 carparks available to staff and visitors, 3 are set aside for accessible parking and 2 for the village's vans, leaving a total of 34 available for staff and visitors.
- The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. This leaves just **nine (9) carparks available for visitors to the site**.
- This number of carparks is completely inadequate for a village of this size. The neighboring streets will become clogged with cars from Ryman's visitors and staff.
- We live in Campbell street and am very concerned of the effect that this will have on my property, as well as the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School, 2 pre-schools, Karori
- Playcentre, Ben Burn Park, Karori Bowling club, Karori Tennis club and the planned 41 X apartments proposed cnr Campbell & Karori Rd that have no off street parking.
- We are also very concerned by the amount of traffic that will be generated by the development and the impacts that this will have on the safety of our streets and in particular the safety of children around the local school, Ben Burn Park, kindergartens, pre-schools and swimming pool.
- Staff numbers at the 24/7 Village will have shifts that overlap for arriving & leaving staff resulting in insufficient staff parking. Original Plan had underground parking. Once it was discovered a stream runs under the open green space that is a flood plain, Ryman



altered plan to less parking, result off street parking will be at a premium and clogged up = issues.

### **Construction effects**

- During the demolition of the Teachers College Buildings in 2019/20, the contracted demolition company often worked outside permit hours, defied traffic planning and noise limits. Dust was also not managed. Complaints were made to WCC to record the issues.
- During the demolition, our property developed cracks to internal walls & ceilings as a result of the machinery breaking & excavation of the existing buildings & concrete flooring. Ground vibration was at a major level. 3-4 years of new proposed building is a risk and inconvenience to residential homes opposite the site. Especially, now work from home is available to many neighbors to the site.
- We are concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honor their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.
- We are concerned by noise generated during construction. We work from home and the effect of 5 years of construction noise will be unbearable.
- 4-5 years of continuous construction traffic on our narrow residential streets will be extremely disruptive and dangerous particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood center's.
- We are also concerned by the effects of ground movement from excavation and piling on my property and request that Ryman honor their original offer to neighbors impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

### **CONCLUSION**

- The proposal is not respectful to the Environment, Community and Character of the established residential suburb of Karori. We request the latest plans are not approved and a re-design is requested in consultation with the affected neighbors.
- Ryman as a public listed company, is vested to deliver a high return on investment, but demonstrating little regard to environmental sustainability, creating value and the detrimental effects to the Karori Community (an established character residential suburb) and to the residents in the neighboring area to the site. As time has gone on the Building plans have got bigger in scale & size.
- Ryman moto is: "Everything we do must be good enough for mum, Dad & community". This latest plan is far from the values & vision of Ryman.
- The proposed site-wide buildings sheer mass and height is unreasonable. We request the Building structures for main buildings (BO1B/BO2B etc) are maximum 5 storey and apartments (BO2/03/04/05) maximum 2 storey.

- We refute Ryman stating they have had on-going regular consultation with close neighbors and the wider community. We have never received any direct contact from Ryman's to hear our thoughts. We live across the road from the site and will be significantly affected! Ryman only ever have presented their revised plans but sought no input from residents. At the few 3 open days, Ryman representatives can't answer simple questions eg/ How many residents & work force = "I think 200 & 40". The answer is 450 residents & 60-80 workers.
- We refute Ryman stating under Clause 6.1 Community Consultation stating: " Neighbours to the site mostly come around to our proposal due to design changes! This is totally untrue.
- Ryman design proposal includes photographs/designs of proposed site buildings and neighboring homes that are disproportionate and to the least impact to affected properties. They are very clever to show the least rather than both the worst impacted properties.
- The continued reference by Ryman to mitigate building height, privacy & sunlight issues to position new plantings is ridiculous. It shows how flawed their proposal application is with so many gaps, sell speak, lack of facts and is so wrong in thinking the neighbors agree with this latest proposal Ryman are seeking approval.

#### **THE DECISION WE WOULD LIKE WCC TO MAKE IS:**

We request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighborhood of residential Karori. Ryman should consult with its neighbors and prepare a revised de-scaled plan that is at an appropriate scale and character for the neighborhood and meeting the district plan.

#### **DELEGATION**

We do not request, pursuant to section 100A of the Act, that WCC delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

#### **ORAL SUBMISSION**

We wish to speak in support of our submission.

If others make a similar submission, I will consider presenting a joint case with them at the hearing

#### **CORRESPONDENCE**

Please serve correspondence to us by email: [sprott.family@xtra.co.nz](mailto:sprott.family@xtra.co.nz)

#### **SIGNATURE**

**Jeremy Sprott/ Debbie Sprott**  
**15<sup>th</sup> May 2022**

# Submission on resource consent application

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

## Notes for the applicant

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**Resource Consents**

**Wellington City Council**

**PO Box 2199, 12 Manners Street, Wellington**

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application       Oppose the application       Neutral

## Submitter details

Name of submitter: Michelle Frances Walton

Address of submitter: 3 Spencer Street  
Te Aroha 3320

Phone (day): 07 884 7545

Mobile:

Email: [michellefwalton@hotmail.com](mailto:michellefwalton@hotmail.com)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

The former Teachers College is an ideal location for a retirement village. Residents will have easy access to the centre of Karori and it is a short distance to Wellington City.

Well designed, high quality buildings and landscaping.

The village is designed specifically to meet the needs of the over-70s for ease of living with one-, two- and three-bedroom apartments and houses.

Need for all levels of care in the community including rest home, hospital, dementia and serviced care.

Providing care within the village means it is available to independent residents if it is needed.

Ryman Healthcare's reputation to provide the best living options and amenities for residents.

Helps relieve pressure on the public health system by providing care within the village.

Alleviates pressure on the housing system by releasing homes to the market when residents move into the village.

Opportunity for Wellingtonians living in other towns to return to retire in their home town.

**The reasons for my submission are:**

I would like to return to Wellington where I was born and where my family have lived since the 1870s.

From my research of Retirement Homes and Villages with Age Concern and Grey Power, I regard Ryman Healthcare the Gold Standard of all the Retirement Villages and Homes.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

11th May 2022

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- it contains offensive language
- it discloses no reasonable or relevant case
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further

**Privacy information**

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**How do you wish to be served with any correspondence**

- via email (please ensure you have provided your email address on page 1)  via post, ie hardcopy

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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**Resource Consents**

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## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: To establish a comprehensive care retirement village on the site.

Service request number: SR471670

Support the application

Oppose the application

Neutral

## Submitter details

Name of submitter: B Dunstan

Address of submitter:

11 Scapa Terrace Karori Wellington

Phone (day): 04 4762411

Mobile: 0224062477

Email: [Bluedunstan@gmail.com](mailto:Bluedunstan@gmail.com)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

- close proximity to boundary with Scapa Terrace • height / 3 stories and 7 stories
- Impacts on light, sunshine and view and hence on wellbeing
- Additional impact on cities aging sewage & water systems could lead to spillage and damage and potential flooding.
- Impact on traffic and infrastructure: Karori primary school already impacts on traffic and parking and proposed add 400 residents, their cars and visitors vehicles

**The reasons for my submission are:**

• lost of wellbeing due to lost of light, sun and view  
Concerns on infrastructure, sewage and water.  
Increased traffic  
Dust and noise during construction.  
Potential lost of value to my property.

**The decision I/we would like Wellington City Council to make is  
(include any conditions of consent you would like to see imposed):**

Reduce height of complex.  
Ensure that cities infrastructure can support increase demand  
Restrict hours of construction and noise to reduce impact on  
Community  
Ensure no further increases to complex in size or height  
in future

**Note: \*Select one.**

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**Oral submission at the hearing**

- I/we wish to speak in support of the submission  If others make a similar submission, I will consider presenting a joint case with them at the hearing
- I/we do not wish to speak in support of the submission

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

12/5/22

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### Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: Proposal to establish a comprehensive care retirement village

Service request number: SR 471670

Support the application  Oppose the application  Neutral

## Submitter details

Name of submitter: Timothy Jacomb

Address of submitter: 161-163 Karori Road, Karori

Phone (day): 0210596120

Mobile: 0210596120

Email: [Tim@KBC.org.nz](mailto:Tim@KBC.org.nz)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

1. I oppose Ryman's application for special consideration of wastewater servicing (Appendix B – Additional Water and Wastewater Demand Information).

1.1. As per Wellington Water's Review (November 2020) Karori WWTP only has 1l/s spare capacity, and the trunk network is already over capacity. This has resulted in overflows into Karori Stream.

1.2. Wastewater capacity is one of the main reasons why Karori has not been earmarked for higher levels of intensification within the WCC Draft District plan, unlike surrounding suburbs (eg. Crofton Downs, Wilton, Kelburn etc.).

2. I oppose Ryman's statement that previous site usage should determine future site permission (Appendix D – Infrastructure Assessment Report Section 4: Wastewater, pg.'s 22-27).

2.1. Previous site usage was deemed acceptable based upon historical infrastructure capacity. New site usage should be determined solely upon current infrastructure capacity. New development/usage requires new assessment.

2.3. WWTP is already failing to comply with its resource consent parameters (quality of wastewater discharge and partially treated effluent - WGN060283 [35674] and [35675]).

2.4. These recent failures include: Effluent non-compliance 2019, Unconsented Discharge 2020, Effluent non-compliance suspended solids and faecal coliform form 2021, FC noncompliance 2021, Non-compliance with final effluent BOD and suspended solids parameters 2021, Effluent non-compliance Nov 2021

2.5. These six infringements occurred during a period of time when no loading occurred from 26 Donald and 37 Campbell as the site was vacant.

### The reasons for my submission are:

1. I am submitting as a local resident who opposes a big commercial development potentially hindering local smaller scale developments in the future due to any remaining capacity in the wastewater system being taken up by this large development.
2. I am submitting as a resident that opposes any development that places excess demand on local wastewater infrastructure that will result in further levels of contaminated water being discharged into local streams and waterways.
3. I am submitting as a tax-payer that opposes large privatised development placing further demand on already failing infrastructure that will require tax-payer money to upgrade, without the business providing any investment into the wider infrastructure ecosystem upon which they rely.

### The decision I/we would like Wellington City Council to make is (include any conditions of consent you would like to see imposed):

1. I would like WCC to deny Ryman special consideration for wastewater servicing.
2. A condition of consent would be for Ryman to deal with all wastewater onsite (26 Donald & 37 Campbell)
3. A recent MBIE thinktank (see Novel Wastewater Processing: impact on our cities, infrastructure and society, 2018) suggested decentralised wastewater systems as a viable mechanism for dealing wastewater in contexts of failing centralised infrastructure.
4. It would not be unreasonable for a company of Ryman's stature (they state that, "each village we build represents a long-term investment in care for the communities we operate in") on a site the size of 26 Donald and 37 Campbell (30,000m<sup>2</sup>), to invest in onsite wastewater treatment facilities that indicate their care not just for the people they sell units to, but also the wider environment and community in which they exist.

### Note: \*Select one.

I  request/  do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

### Oral submission at the hearing

- I/we wish to speak in support of the submission
- I/we do not wish to speak in support of the submission
- If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

Date

17th May 2022

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**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Tuesday, 17 May 2022 12:44:36 pm

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## Submitter details

**First name:** Harriette  
**Last name:** Carr  
**Address:** 10 Matai Rd  
**Suburb:** Hataitai  
**City:** Wellington  
**Phone:** 3861213  
**Email:** harriette.carr@xtra.co.nz

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

Enables people wishing to live in the village to remain in their local community, rather than move out of Wellington.  
Will free up houses in greater Wellington.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

### The decision I / we would like Wellington City Council to make is:

Approve the development of the village.

## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
 Site address: 26 Donald Street and 37 Campbell Street, Karori  
 Proposal: To establish a comprehensive care retirement village  
 Service Request No: SR 471670

Responsible Development Karori (RDK) opposes the application.

### Submitter Details

Name of submitter: Responsible Development Karori Inc  
 Address of submitter: 49 Campbell Street, Karori, Wellington 6012  
 Mobile: 0275 395 395  
 Email: [rdksociety@gmail.com](mailto:rdksociety@gmail.com) / [andrew@cooperassociates.co.nz](mailto:andrew@cooperassociates.co.nz)

## SUBMISSION STATEMENTS

Responsible Development Karori (RDK) supports residential intensification and the use of the old Teachers' College site as a "windfall site" under Residential Area Policy 4.2.1.5 for a retirement or other intensive residential development. However, RDK considers that the proposed nature and scale of the development and the consequential impacts on the community and infrastructure is not consistent with the clear caveat in Residential Area Policy 4.2.1.5 which states "Enable residential intensification within the Inner and Outer Residential Areas provided that it does not detract from the character and amenity of the neighbourhood in which it is located." The over-dominance of the building scale, loss of open space and impacts on the local infrastructure of the proposed development will detract from the 'character and amenity of the neighbourhood'.

As a non-complying activity, WCC may only grant approval for the consent if:

- a) the adverse effects of the proposal will be no more than minor, or
- b) the proposal will not be contrary to the objectives and policies of the District Plan.

RDK considers that Ryman's proposed development fails on both of these tests – the effects of the proposed development on the environment and the neighbouring community are significant (i.e. more than minor) and the proposal is materially inconsistent with the objectives of the policies of the District Plan for a residential community in the Outer Residential Area of Karori (refer Appendix 1 of this submission).

RDK also considers that Ryman's proposal is contrary to the Resource Management Act for the following reasons:

- it fails to avoid or mitigate adverse effects on the environment;
- it fails to provide for future generations due to its adverse impact on the environment and the generational investment in a fossil fuel based energy source;
- it fails to comply with the relevant statutory planning policies; and

- it will contribute to environmental degradation due to the imposition on Karori's constrained infrastructure.

Without limiting the generality of the application's failure to comply with the District Plan and the RMA, specific aspects of the application that RDK opposes are:

- Impacts on constrained infrastructure in Karori.
- Subs-standard analysis of wastewater effects and lack of mitigations to minimize effects on downstream infrastructure.
- Building scale out of character and dominating effect over surrounding residential area.
- Building design and scale not consistent with WCC Residential Design Guide.
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Shading effects.
- Wind impacts.
- Parking impacts.
- Noise impacts.
- Traffic impacts, particularly during construction.
- Construction impacts – dust, noise, ground movement.
- Lack of consultation with the community.

## **RDK'S REASONS FOR OPPOSING THE DEVELOPMENT**

### **1. District Plan and infrastructure constraints**

- a) In 2015-16, WCC undertook a review of suburbs that could support planning changes to medium density housing. At this time WCC decided not to proceed with a change in zoning in Karori to medium density housing because the infrastructure cannot cope – roading, public transport, stormwater and sewerage all being constrained and at capacity. Nothing has changed since that decision was made 6 years ago. In fact, the infrastructure is now just 6 years older, with natural population and infill increasing the pressure further.
- b) In WCC's current review of the District Plan, housing intensification and height levels are proposed to be increased in most other suburbs close to the city with good public transport connections. The exception is Karori with zoning and height limits within the suburb unchanged, other than in the immediate vicinity of the two village centres.
- c) Karori remains zoned at outer residential with an 8m height limit. This is because WCC has determined that the infrastructure in Karori cannot sustain the level of intensification that can be achieved in other suburbs.
- d) Ryman are proposing a development that not only substantially exceeds the district plan guidance for height limits but also for building scale and site coverage. While suggesting that apartments B02 and B03 are 'just over' the height limits at 11m, does not also recognize the overall mass of these buildings, with B02 and B03 both 72.5m in length. That is longer than most city blocks, with very few individual buildings within the CBD reaching 70m in length, let alone in the suburbs.

- e) The proposed development comprises a series of six 11m high, 19m wide, 40-70m long apartment complexes set back only 5m from the street and neighbouring properties on what was is currently open space. These apartment blocks are themselves dwarfed by the complex of buildings that make up building B01 with a visual mass that is 85m in length, 68m in width and six stories in height. The scale and mass of the buildings proposed by Ryan are completely out of context, scale and character with the residential surroundings and bears no reflection of WCC's residential design guide.
- f) Further discussion on RDK's assessment of the proposed development against the District Plan and the WCC's Residential Design Guide is provided in Appendix 1 and 2.

## **2. Overall mass and scale**

- a) We do not need to perpetuate mistakes of the past. Ryman profess that the proposed development will be a positive for Karori because the development replaces large 1970s 'brutalist' architecture. Irrespective of the aesthetics, we doubt that the height and scale of the Teachers' College buildings would be approved under current district planning rules and today's more advanced considerations of urban planning. Consequently, replacing one style and scale of architecture with another of similar style and scale, simply because the previous 1970's urban planning thinking allowed buildings of this scale and aesthetics to be built in the heart of suburban Wellington, is not a reason to perpetuate 1970's planning rules.
- b) A feature of the previous site use was that the buildings were clustered closely together in the north-east (NE) corner of the site, being the furthest distance from the majority of neighbouring houses. The rest of the site was open space, sports facilities and trees which provided a mitigating visual buffer against the effect of the original buildings.
- c) Ryman's proposal seeks to increase the mass of the buildings in the NE corner while removing the open space that mitigated the effects of the large buildings, replacing this open space with a series of six 3 story apartment blocks, that in themselves are oversized and out of context with the surrounding neighbourhood.
- d) R.A. Skidmore and McIndoe Urban appear to have formed their respective opinions that the visual effects on the surrounding community are low to positive, principally on the basis that the previous NE cluster of institutional buildings are being replaced with buildings that are more modern and residential in nature.
- e) Their opinions appear to have a singular focus on this aspect as they do not consider that the extra mass of buildings, including six 3 story apartment buildings on current open space only 5m from neighbouring boundaries, in any way detracts from the positive benefit of replacing the NE cluster of buildings with a different style of building.
- f) While B01b is similar in height to the previous Malcolm Block, it is 7m higher than the previous Pankhurst Block – a 50% increase in height. The southern wing of B01b is materially higher than the previous Waghorn Block. The new 3 story apartment blocks B02-B07 are built on currently open space so in no way echo heights of existing buildings, as there are none to compare against. While local residents are familiar with the clustering of buildings in the NE corner of the site, the proposed development

includes six 3 story buildings on what is currently open space. Residents are not familiar with such densification which is materially out of character with the surrounding area.

- g) There is a stretch of the southern boundary that cannot be planted due to over-intensive development of the site encroaching over water infrastructure. This results in not only the direct exposure of B04 to the immediate southern neighbours but exposure of B03 and B05 for these neighbours also.
- h) Various statements throughout Ryman's submission are incongruous and disingenuous with the mass and scale of development proposed. Some examples include:
- *"With the exception of the buildings located in the southern area of the Site, the footprint of the Proposed Village has been designed to be generally consistent with that of the Teachers' College."* There will be six three-story buildings in the southern area of the site (two of which will be 72.5m in length) on land that is currently open space. The Proposed Village has not been designed to be generally consistent with that of the Teachers' College. It is not possible to consider the development with the exception of the buildings located in the southern area of the Site.
  - *"Overall, any visual character effects of the Proposed Village on Donald Street will be positive."* It is incongruous to consider that a building in place of gardens and open space can be considered positive on the visual character of the street frontage on Donald St. There is a very minor positive effect with the addition of windows in Allen Ward Hall, however this is completely outweighed by the construction of a new 3 story apartment block in place of gardens and green open space.
  - *"The street boundary setback of 6.1m (approximately twice the minimum depth required by the ORA front yard standard) similar to the Campbell Street residential properties to the north and south of the Site."* While the setback is twice the ORA requirements, the building itself is 3m taller than the ORA guidelines and 72.5m of continuous length contrasts completely with the principles of the ORA design guide.
  - *"It is considered that the effects on neighbouring properties that are traditionally experienced with intensification will not be generated. In particular, the building heights and boundary setbacks of the Proposed Village respond to the scale, character and amenity of the public streets and properties adjoining the Site."* Building heights ranging from 3 story (within 72.5m long continuous blocks) to 6 story buildings do not in any way respond to the scale, character and amenity of the public streets and properties adjoining the Site.
  - R.A. Skidmore refers to the lower height of Building B01b when compared with the tower (or Malcolm Block) and makes comparison between the 10 stories of the Malcolm Block and 6 stories of B01b. However, this reference fails to compare the actual height differential between the Malcolm Block main roofline and B01b, which is only 4.65m and the significant extra length and mass of the new Building B01b.

- McIndoe Urban confirms the impact of extra scale in its statement “A juxtaposition in scale between the foreground and Proposed Village will occur due to the height of the proposed Building B01b combined with the large mass of the building.”, yet remains of the view that residents will experience only minor adverse visual dominance and character effects. These two positions do not align.
- McIndoe Urban makes the statement that “a building’s overall 3-dimensional form as well as its modulation and articulation need to be considered together when assessing the visual impacts of the bulk of a proposal.” Yet then makes a 2-dimensional comparison of the width of buildings B02-B06 with the lengths of the neighbouring properties, concluding that B02-B06 are not out of scale with the neighbouring properties. However, McIndoe Urban fails its own recommendation to consider the 3-dimensional form. In this case the 3-dimensional form of buildings B02-B06 is of 19m wide, 3-story high and 40m to 70m long apartment blocks. The conclusion from a 3-dimensional consideration is that buildings B02-B06 bear no resemblance at all to the scale of the neighbouring properties.
- McIndoe Urban also make the statement “In some instances, the ground level of proposed buildings sits below neighbouring properties” and therefore considers that the “visual dominance effects on those properties will therefore be less than minor.” While the ground level of buildings B02-B06 may sit below the ground level of the adjacent Scapa Tce properties, buildings B02-B06 rise from the ground level to 3-story buildings overlooking mostly single level houses. The visual dominance of these buildings, as demonstrated in McIndoe Urban’s own visualisations, are significantly more than minor. Particularly due to the orientation of the primary living areas of the neighbouring properties which look to the north.
- Sarah Duffell’s peer review comments that design changes to the building treatment achieve a better contextual relationship than Ryman’s original plans. This comparison is irrelevant as the effects of the development should be assessed on a stand-alone basis, not as a comparative to an obsolete design.

### **3. Inappropriate mitigations**

- a) The visual assessment undertaken by R.A. Skidmore concludes that “For a limited number of residential properties (16, 18 and 24 Scapa Terrace and 49 Campbell Street), adverse visual effects will be reduced to, or remain, low following the establishment of planting. For all other properties, effects will be very low to positive.”
- b) R.A. Skidmore suggests that as planting matures over time the visual impacts will be mitigated. We would contest that the ability to screen 11m tall buildings, with very little setback from neighbouring properties, with suitably sized trees, that in themselves will not worsen the outcome due to their size and shading effects, will be extremely limited.
- c) The proposed planting plan designed to mitigate the visual dominance of buildings B02-B06 from the neighbouring properties by using Rimu, Pohutukawa and Silver Fern are

completely inappropriate for a 5m buffer zone. The tree species proposed will take many years to mature to a size necessary to counter the visual dominance of the proposed buildings. Once mature the tree species proposed will be dominating in themselves and will exacerbate the shading that will be experienced from the new buildings.

- d) Pohutukawa are especially unsuitable for planting near buildings due to the invasive root structures that encroach into and damage building foundations and underground pipes.
- e) Proposing inappropriately sized trees as a mitigation against the visual effects of buildings B02-B06 is an admission by Ryman that the adverse visual effects of buildings B02-B06 are so significant that they require mitigation by very large trees.
- f) More suitable natives for the area would be pittosporum, cordyline (cabbage tree) and Griselinia (Kapuka). However due to the length of time that any planting will take to shield the obtrusive buildings B02-B06, an initial mitigation would be to plant the southern walls as living green walls or vertical gardens.
- g) However, the longer term responsible mitigation is to descale the overall development and to design a facility that is more appropriate in scale, with less impact on the surrounding community. A facility with buildings of comparative scale to neighbouring properties that require softening, rather than hiding, from planting.
- h) To the best of our knowledge neither R.A. Skidmore nor McIndoe Urban interviewed or accessed the properties on which they have based their opinions of visual effect. In the opinion of the residents, the substantial additional building mass, imposing building heights and loss of open space has moderate to significant adverse visual impacts on the surrounding neighbourhood – not the low to positive effects that R.A. Skidmore and McIndoe Urban purport.

#### **4. 'Windfall' site**

- a) As noted in our opening comments, the intent of windfall sites is to “Enable residential intensification within the Inner and Outer Residential Areas provided that it does not detract from the character and amenity of the neighbourhood in which it is located.” The over-dominance of the building scale, loss of open space and impacts on the local infrastructure of the proposed development will detract from the ‘character and amenity of the neighbourhood’.
- b) More intensive development doesn’t mean 70m long multi-story apartment blocks in a suburban setting. Other examples of intensive development in Karori include Futuna Close, Saddleback Grove and The Pavilion beside Karori Park. All of these are examples of intensive developments, but in keeping with the context of the surrounding community.

## 5. Data

- a) There is no verification or peer review of Ryman's data for water use or wastewater volumes which are based on outdated assessments, commissioned by Ryman, of a very small number of Ryman villages.
- b) The application references a 2008 memo on the basis of water surveys at two Ryman villages measured in 2007. The memo also references 2004 data. A 2016 report on a single Christchurch village is also referenced. No comparison is made to the applicability of these other villages to the proposed Karori village.
- c) The assessment relies on the basis of 1.3 inhabitants per apartment but does not discuss consideration of more intensive occupancy in hospital and rest home facilities and the impact these facilities have on water usage.
- d) Simply relying on the statement that "...Ryman are experienced operators of comprehensive care retirement villages and have collected historic information on occupancy rates, water demands, and sewer loads for this type of village" places sole reliance on the applicant to provide data. Ryman should be required to undertake a more up to date analysis of water usage at more representative villages, with appropriate peer review.
- e) Commissioners should not simply accept the resource use analysis on the basis of numbers provided by Ryman. Ryman claim that other jurisdictions have accepted their numbers. That may be the case in other jurisdictions, but shouldn't lead Commissioners to accept Ryman supplied data without verification that the numbers are indeed an accurate representation of retirement villages of this nature. Ryman should be asked to supply an independent verification of the numbers that they are using with an explanation of the methodology used and base numbers underpinning the analysis, sourced from more extensive and updated reference sites.

## 6. Waste Water

- a) The Karori stream is one of the most polluted in the country with dangerously high e-coli levels after any noticeable rainfall. This is because of the aged water infrastructure in Karori with a high prevalence of wastewater/stormwater cross connections. As a consequence, when it rains high levels of stormwater enter the sewerage system at volumes that the sewerage plant in South Karori is unable to cope with. The consequence is upstream overflows into the Karori Stream and its tributaries. This will be exacerbated by Ryman's very large development and the addition of wastewater generated by the extra 400 residents and staff.
- b) In relation to its assessment of wastewater effects from the proposed development, Wellington Water makes the following two conclusions and notable disclaimer: (added underline emphasizes key issue):
  - "While the local network has at least 3 or 5 litres/sec (depending on the connection point) of spare design capacity during a 1-year LTS design event, the trunk network servicing this property is to be already over its design capacity during a 1-year LTS design event with overflows occurring into the Karori Stream



at engineered overflow points. Further development of this property will exacerbate this." (source: Appendix D Infrastructure Assessment Report)

- "Hence the wastewater generated by the development of this Site will require careful consideration at Engineering Approval stage as on site wastewater detention may be required." (source: Wellington Water Resource Consent Conditions, 30 November 2020)
  - "Disclaimer: This assessment is based on the results from WWL hydraulic models as defined in this memorandum. It does not take into account the impact on the spare design capacity of other developments that have occurred since then, are currently underway, or possible future developments. Non-hydraulic parameters like pipe age, conditions and likelihood of their failure have not been assessed. Flow monitoring may be required to verify these results. This development may impact on the spare design capacity available for possible future developments along the downstream network." (source: Appendix D Infrastructure Assessment Report)
- c) Since the date of the Wellington Water assessment, spare capacity will have been appropriated by multi-townhouse developments at Cook/Beauchamp St and at 210 Karori Rd, and will be further impacted by a 17 townhouse development on Chamberlain Road and WCC's plans to develop the corner of Campbell St and Karori Road with a 40 apartment mixed use development.
- d) Given the parlous state of the city's water infrastructure, the Wellington Water assessment provides little confidence that the local wastewater system can cope with the increased flow from the scale of Ryman's proposed development.
- e) Without mitigation by Ryman, the extra load on both the trunk network and the Karori WWTP will cause inevitable strain and potential failure of the wastewater network, resulting in extra pollution of the Karori Stream and associated waterways. The Karori Stream is an important area and must be protected from further degradation. Ryman must not be allowed to further degrade the area for their commercial gain.
- f) It is extremely concerning to RDK that the consent application does not include mitigations for the impact of the high levels of wastewater from this site. Deferring possible mitigations until the Engineering Approval stages is unacceptable.
- g) Without such mitigations designed into the complex at the application stage prevents the community from assessing the true impact of the development on the community and the environment.
- h) RDK is further concerned by the robustness of the analysis undertaken by Wellington Water which has been undertaken on limited data points provided solely by Ryman. We expect evidence of far more robust analysis of the effects from developments of this scale.
- i) Section 5.4 of the AEE states "the peak flow discharging from the Proposed Village will be less than that of the Teachers' College, and as such there is no requirement for onsite wastewater storage. As wastewater flows from the Proposed Village will be less than those of the Teachers' College, there will be a positive effect on downstream infrastructure as the demands of wastewater flows will decrease."

- j) This statement is disingenuous and irresponsible. The Teachers' College has not been occupied for many years. It is at least a decade since it was at full use. With the increase in population in Karori and degradation in pipe infrastructure since that time, the comparison is meaningless. The timing of peak use is also important. Due to the daytime occupation of the Teachers' College, its peak use will have coincided with off-peak use by the rest of the local population. Conversely, peak use by the retirement village is likely to coincide with peak use of the general Karori population and will be sustained 24/7, 365 days.
- k) The statement also does not reflect the concerns raised in the Wellington Water report, as underlined above and Wellington Water's conclusion that on site wastewater detention may be required.

## 7. **Shading**

- a) The shading diagrams illustrate significant shading effects on properties for extended periods that result in more than minor adverse effects for those properties to the east, west and south of the development.
- b) The illustrations indicate that some properties will lose substantial sun from their current situations and that this loss of sun extends from mid-winter through until summer, i.e. year round. Such loss of sun will have a more than minor effect on the many properties affected.
- c) The shading illustrations include a red line indicating "shading from buildings built to residential building standards." The red line is inaccurate and disingenuous. Buildings built to the residential building standards would not be the continuous mass that Ryman's proposed development will be. Buildings built to the residential building standards would not have the same site coverage, would include a range of roof profiles and would be represented by more stand alone buildings. In this way buildings built to the residential building standards would provide interspersed shading effects rather than a single solid mass of shading that the Ryman development will impose on its neighbouring properties.
- d) A further concern by RDK is that there is no peer review of the shading diagrams. There are peer review reports of other aspects of Ryman's application, but none for shading. RDK has no way of verifying that the shading effects are an accurate representation of the future shading on the community. Commissioners should also not accept Ryman's commissioned imagery of shading without an independent verification of the effects.
- e) It is not clear from the shading diagrams whether the shading effects take into account the future impact of the trees to be planted along the southern boundary to reduce the visual impact of buildings B02-B06 that will grow to heights in excess of 10m. This effect in future years will exacerbate the increased shading on the neighbouring properties to the south of the site.
- f) As noted elsewhere in this submission, the requirement for such tall trees would not be necessary if buildings B02-B06 were within the permitted building heights and were of a scale more considerate to the residential environment in which they are placed.

## **8. Wind**

- a) Wellington is a windy place, and Karori is a windy suburb, in particular in the more open central area of Karori where the prevailing northerly wind whips over the saddle at the top of Parkvale Road. The Teachers' College site sits in the direct path of this wind.
- b) Due to the windiness of Wellington city, the WCC have developed a specific design guide for wind. <https://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/district-plan/volume02/files/v2wind.pdf?la=en>
- c) The height, length, rectangular shape and north-south orientation of nearly every building in the development fails to acknowledge the guidance provided in WCC's Design Guide for Wind.
- d) The north-south orientation for tall rectangular buildings will exacerbate the wind effects on an already windy site. This will not only increase the wind effect on neighbouring properties but will increase the danger and discomfort for residents.
- e) According to WCC's Design Guide for Wind the design of the development will exacerbate the wind effects at ground level around the site. This will be particularly acute between the apartment blocks which will act as funnels for the wind. This will make conditions on windy days not only uncomfortable but dangerous for Ryman's elderly residents, who by their nature will not be the steadiest on their feet. It will also exacerbate the wind effect for neighbours.
- f) The only mitigation proposed by Ryman to address the very windy nature of the site, exacerbated by the size and orientation of the buildings, is through plantings. However as noted in the wind assessment report, such mitigations will only become effective once the plantings are at maturity. With some of the species proposed, this will be decades in the making.
- g) The Wind Assessment Peer Review notes similar concerns and that there is a lack of consultation between the wind and landscaping reports.

## **9. Noise**

- a) Undercroft carparking, if of the same design as normal basement carparks, will generate substantial tyre squealing noise that will not be mitigated by the usual underground location of village carparks. Instead, the undercroft parking runs at ground level adjacent to the southern boundary at a distance of only 5m. From the visual plans it appears that the walls of the carparking facility is brick interspersed by large panels of 'render' and aluminium joinery. These materials are unsuitable for mitigating the high-pitched tyre squealing of basement type carparks.
- b) There is no reference in the noise assessment reports to the nature, source or mitigation of this noise.
- c) RDK and residents expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal and that the southern façade comprises suitable noise attenuating materials.

- d) It is noted that the impact of such noise will also negatively impact the residents of the village particularly those in ground floor apartments immediately adjacent to the carparks.

#### **10. Amenity for residents**

- a) The scale of the development results in the majority of apartments and rooms being oriented east west and, with the effect of shading by the large buildings in the complex, will see very little sun at most times of the year.
- b) The orientation of the majority of the buildings on the north south axis, with minimal spacing between buildings relative to each buildings' scale, will result in loss of privacy for residents, with apartments looking directly into other apartments This is likely to result in a 'barracks' type feel to the village – not the high quality amenity marketed by Ryman.
- c) Within the application, Ryman also markets the future village as being the final move for prospective residents due to the full range of care provided on site. This again is inaccurate and disingenuous. Anecdotally, we understand that the ratio of care beds to apartments (60 care beds to 247 apartments and suites; 24%) is substantially less than Ryman's other large villages (Bob Scott has a ratio of 106 care beds to 334 apartments and suites; 32%). At other villages Ryman is unable to guarantee a care bed for any apartment resident, with residents required to move to another facility if care beds are unavailable at the time one is needed. The low ratio of care beds to apartments in the proposed Karori village means that the prevalence of residents requiring the next level of care having to move to another location is higher than it would be at other villages and makes a falsehood of Ryman's marketing.
- d) A more responsible development of appropriate scale would provide a more balanced ratio of care beds to apartments, reducing the traumatic incidence of residents having to be relocated to another facility at a very vulnerable time in their lives.
- e) The scale of the development has resulted in very narrow perimeter buffers resulting in the lost opportunity to offer external exercise for residents by creating a safe perimeter walk for the residents. All proposed pathways are purely for access purposes and do not give residents the outdoor exercise and socialization opportunity, and associated health and wellbeing benefits, that a perimeter walking track around the site would provide.
- f) Section 2.1.11 of the AEE states that the pedestrian paths provide a series of loop walks for the residents within the confines of the village. There is no indication from the site plans that there is a series of loop walks. On the contrary there are linking paths between buildings, but not loop walks. Due to the building coverage in the NE corner and elevation into this area of the site, the best opportunity to provide walking exercise and outdoor stimulation and socialization for the residents is around the perimeter of Buildings B02-B06. This could be easily achieved with a responsible, appropriately scaled development that was set back from the boundary and was less intensive.
- g) In planning for the wellbeing of the residents in this way, Ryman would have the opportunity to design a village that is more appropriate for the size of the site. This

would materially improve the overall amenity for residents and reduce the adverse impacts on the surrounding community.

## **11. Landscaping**

- a) The selection and planting of large tree species, Pohutukawa, Rimu and Silver Fern, along the southern boundary to mitigate the dominating effects of Buildings B02-06 is inappropriate and out of scale with the residential character of the surrounding properties.
- b) Pohutukawa have very rigorous roots that damage building footings and drains. Planting Pohutukawa in the location of a comprehensive stormwater drainage network is irresponsible and unnecessarily increases the risk of flooding due to damage to the stormwater pipes in the vicinity of the plantings.
- c) Pohutukawa also require full sun and are frost tender when young. This location suffers from severe frosts in mid-winter and, located on the southern side of very large buildings, will see little sun when young, compromising their growth rates and therefore the visual mitigation effects that they are intended to provide.
- d) Rimu will eventually grow, over decades, into 35m tall trees that are completely unsuitable for small spaces in a residential neighbourhood. Ryman's proposal to plant Rimu trees in this context infers either, that they do not have a long-term vision for this site or do not consider the wellbeing of neighbours of the site in 50-75 years to be important.
- e) Silver Ferns will also grow into large trees with wide canopies that will drop ferns into neighbouring properties and exacerbate the shading from the large buildings that they have been selected to block.

## **12. Carparking**

- a) Section 2.1.10 of the AEE states: "Car parking within the Site will consist of a total of 230 car parks (including 9 disability / accessible car parks), of which 190 will be located in the basements or ground level of Buildings B01 – B07. The remaining 40 car parks will be located at-grade around the Site. 25 car parks will be allocated for staff use."
- b) Document 1 'Plans - Summary' states a total of 229 carparks, of which 39 are outside the secure apartment garaging (presumably referred to as 'at grade' in the AEE). Of the 39 at grade carparks, 3 are set aside for accessible parking and 2 for the village's vans. This leaves a total of 34 available for staff and visitors. However, with the AEE stating that 25 carparks are allocated for staff use, this leaves just nine (9) carparks available for the visitors of a 400 resident complex.
- c) Nine visitor carparks is completely inadequate and irresponsible as it will result in material spillover parking, flooding the neighbouring streets as well as the adjacent carpark of the neighbouring Karori public swimming pool.
- d) The Traffic Assessment Report states that "Based on the parking ratio used at other recent Ryman Villages and the RTA Guide, the proposed 230 onsite parking spaces are considered to meet the parking demand of residents, staff, and visitors at the Proposed

Village.” The report however provides no analysis on the adequacy of the carparking at other Ryman Villages. Anecdotally, on the experience of members of RDK who have parents at Charles Fleming village in Waikanae and Bob Scott village in Petone, visitor carparking at these sites is inadequate and significant spillover parking occurs in the residential streets surrounding these villages. If the traffic consultant is going to rely on parking ratios provided by its client Ryman, it should at least provide verification through traffic studies at these other sites as to the adequacy or otherwise of Ryman’s own ratios.

- e) The inadequacy of on-site carparks in the proposed Karori village will have material impacts on residents, visitors to the swimming pool and parents and staff of Karori Normal School and Donald Street pre-school.
- f) Further context of the inadequacy of the on-site carparking provided is reflected in Section 4.2.1.1 of the AEE which states that “in accordance with the District Plan the Proposed Village requires at least 310 car parks, however only 230 are proposed.”
- g) While RDK accepts that the overall carparking ratio of a retirement village may be lower than other residential developments, and that there is a need to reduce the emphasis on car-use at a societal level, the provision of 25% less car parking than is required by the District Plan, resulting in just nine visitor car parks for the site is not a responsible outcome.
- h) A de-scaled village will a) reduce the overall number of carparks required and b) free up more land for the appropriate number of carparks for the site, reducing the significant adverse effects on the surrounding community.

### **13. Traffic**

- a) The Transportation Assessment Report assumes that 90% of trips entering and exiting the site will come from / go towards the east. With the majority of traffic movements for the elderly generally for essential travel to shops and medical facilities, it is difficult to understand how this assumption has been derived. The local supermarkets, green-grocer, pharmacy, main medical centre and dentist rooms are all to the west of the site. The majority of independent apartments are to the west of the site and therefore residents who drive will most likely exit onto Campbell St to the west.
- b) As a result many elderly residents will be challenged with exiting the unsignaled Campbell St onto the very busy Karori Road.
- c) With only nine on-site carparks for visitors (see point 12 above), visitors to the site will be parking in all streets surrounding the site, including Donald St, Scapa Terrace and Campbell St in particular. As visitors will be forced to park outside the site it is likely that more visitors will traverse Scapa Tce and Campbell St than is assumed in the Transportation Report.
- d) The Traffic Assessment Report makes comparisons between the peak traffic generated by the site under its former purpose of the Teachers’ College. This comparison is irrelevant and spurious as the Teachers’ College was officially closed six years ago and was in decline for some years prior to that. It is a decade since the site was at peak occupancy. Since that time Karori’s population and traffic volumes have grown. The

impact on Karori's traffic should be assessed against the current baseline from the site, which is zero.

- e) RDK's concern is that the Transport Report has made very broad assumptions on traffic flows, making comparisons against an irrelevant baseline and failing to take into account the reasons for village residents' travel and the lack of on-site parking for visitors. Flawed assumptions leads to inaccurate outcomes and impacts. Consequently the Traffic Assessment Report cannot be relied upon.

#### **14. Construction effects**

- a) Dust – due to the windiness of the site, it will be very difficult to contain dust generated by the construction activities. It is requested by RDK that Ryman take all practicable measures to minimize dust from the site and to honour their original offer to neighbours to have their houses washed periodically (at least 3 monthly) during the construction phase.
- b) Ground movement – the scale of excavation and piling during constructions risks ground movement that has the potential to cause seismic damage to neighbouring homes. It is requested by RDK that Ryman honour their original offer to neighbours to have their homes assessed pre, during and post construction and to rectify any movement or shaking impacts on homes from the construction activities.
- c) Noise – it is expected that appropriate noise constraints will be placed on the development to prevent disturbance to neighbouring homes, noting that many neighbouring homes have young families and the recent change to work from home practices should be taken into account.
- d) Traffic – it is highly concerning to RDK that the scale of the proposed development will result in 4-5 years of continuous traffic comprising large construction trucks and other vehicles on narrow residential streets, passing by the front gates of a primary school, a public swimming pool and early childhood centres.
- e) RDK requests that no traffic movements to and from the site occurs half an hour either side of the school day start and end to prevent the streets around the school becoming clogged (more than they already are at these times), to reduce tailpipe emissions around our school children and to prevent the unnecessary risk of accidents and injury.
- f) To reduce disturbance to residents, RDK requests that construction activity be limited to the hours of 8am-5pm weekdays, 8am-midday Saturdays and no activity on Sundays.

#### **15. Energy and greenhouse gas emissions**

- a) Ryman make mention of sustainability initiatives in their application and should be commended for doing so. However, the list is uninspiring and disappointing in its ambition.
- b) Amongst a small number of sustainable features, Ryman propose to “install energy efficient appliances and lighting”, however no detail is provided of what these will be or in what part of the development. As the residents of independent apartments in Ryman villages are responsible for their own energy bills, Ryman does not have a commercial

incentive to follow through with the claim of installing energy efficient appliances and lighting. Consequently, as the scale and nature of the development will result in energy demands significantly higher than compliant activities, minimum standards of appliances and lighting in all aspects of the development should be made a condition of the consent, with appropriate monitoring to ensure compliance.

- c) The Climate Change Commission's 2021 advice to the Government recommended that the Government set a date on the halt of new gas connections once a national energy strategy is developed due to the impact that the burning of natural gas in domestic and commercial applications has on the environment. While a date for the banning of new gas connections has not been set in the Government's first emissions reduction plan, the signals are clear – there is a need for all sectors to reduce the reliance on fossil fuels. Investing in long term infrastructure that commits a site to decades of unnecessary ongoing greenhouse gas emissions is simply irresponsible.
- d) Ryman are proposing to install natural gas for heating, hot water, cleaning and cooking, reflecting Ryman's short term focus on profit at the expense of the environment.
- e) Due to the scale of the development, RDK requests that consent conditions require Ryman to take a long term, responsible approach to the environment and to do everything possible to mitigate the effects on the environment, including reducing greenhouse gas emissions from the site. This would include at a minimum:
  - Forgoing natural gas and using electricity for its heating, hot water, cleaning and cooking
  - Maximising the capture and use of solar power across the site
  - Installing electricity storage on-site to avoid peak loads on the electricity network
  - Designing all buildings to a 6 star Greenstar building standard

## **16. Lack of consultation with the community**

- a) In section 6.1 of the AEE, Ryman describe their efforts at consultation with the community. While it is correct that Ryman held open days, these were presentations of their plans and in no way were forums for consultation. Ryman did not ask for views from the community at these open days.
- b) Ryman also correctly state that they undertook one-on-one meetings with neighbouring landowners. For the neighbouring properties this constituted a single one-off meeting for a small number of adjacent properties. Again, this was to present plans rather than undertake meaningful consultation. There was no follow-up and no outreach or ongoing dialogue between Ryman and its neighbours. There has been no endeavour from Ryman to consult with RDK to understand the concerns of the community and how these may be addressed.
- c) It is fair to say, as Ryman states in its application, that “most groups are comfortable or excited for Ryman to construct a village due to the opportunity for intergenerational relationships and the addition of a community amenity”. However, that is not to say that the community is comfortable or excited at the scale of the proposed village and the



very adverse effects that the village will have on the community. On the contrary most people in the neighbouring community are extremely concerned by the scale and impact of the proposed development.

- d) Ryman falsely state that “neighbours to the Site have mostly come around to our proposal due to design changes such as removing basements from Buildings B02-B06, additional planting along the boundary where possible and refined designs of the buildings.” The proposed changes are slight improvements on the original design but in no way infer that neighbours have ‘come around’ to the over-bearing scale of the development and its effect on neighbouring properties and the environment. Ryman have not talked with neighbours to the Site, therefore have no standing to make such claims.
- e) RDK requests that for a re-designed, de-scaled village, Ryman will be required to meaningfully consult with the community.

## **17. Economics**

- a) Ryman will claim that downscaling or changing their plans will impact the economics of their development. This should not be a consideration and does not mean that a smaller scale development cannot be productive and help to solve current housing shortages, whether for the elderly or others.
- b) Ryman chose to pay \$28 million for this site. They beat others to it who were not prepared to pay this amount of money. We can only presume that others chose more modern thinking designs when considering uses for the site, with consequently lower resident ratios.
- c) Downscaling the proposed development to one that is more in keeping with the fabric of the community may change the payback time for Ryman. This is simply a function of what they decided to pay upfront for the site. Ryman’s investment strategy should have no bearing on the Commissioners’ decision about what an appropriate scale of development should be for this site.

## **18. Other precedents**

- a) In its Bob Scott development in Petone, Ryman were required to step their buildings up from one-story to two-story to three-story and to increase buffer zones from the boundary as the following image illustrates.
- b) Note that the Bob Scott development is bordered on three sides by reserves and the rail corridor and shares only one common boundary with neighbouring residential properties. As the residential properties are to the north of the village, they are unaffected by loss of sun and most living areas of the neighbouring houses will be oriented to the north, away from the village.
- c) This is the opposite situation to Ryman’s Karori proposal which is to the north of the neighbouring residential houses whose living areas are consequently oriented directly into the proposed development and will be more impacted by shading and loss of privacy than the Bob Scott development.

- d) It is expected that within a de-scaled development, at a minimum, a similar outcome to the Bob Scott development can be achieved.



Figure 1: Bob Scott Retirement Village – staggered building heights

## CONCLUSION

Ryman's proposed development is contrary to the purpose of the RMA and is a non-complying activity under the District Plan. In accordance with the test for approving a non-complying activity, Council must be satisfied that approving the consent would be consistent with the objectives and policies of the District Plan or has environmental effects that are no more than minor.

On both of these points, Ryman's proposed development fails.

As articulated throughout our submission, and with particular reference to the comparison against the District Plan objectives in Appendix 1, RDK has set out the numerous points of failure against the objectives of the District Plan.

The failures against these objectives, the over-bearance of the building scale in the residential setting, the direct impact on neighbours and the impacts on and risks from constrained infrastructure result in the environmental effects of the proposed development being materially more than minor.

As outlined in our opening statement, Ryman supports responsible intensification in Karori and supports the use of the former Teachers' College site for a retirement village. However, RDK opposes the scale and impact of the development proposed by Ryman.

RDK would support a materially de-scaled development that is:

- aligned to the purpose of the RMA and the objectives of the District Plan and the Residential Design Guide for the Outer Residential Area,
- built to a scale and design that is consistent with and sympathetic to the surrounding neighbourhood and whose effects are no more than minor,
- provides a true quality of amenity for its residents, and

- places only a light footprint on both the environment and on Karori's aged and failing infrastructure.

#### **THE DECISION RDK WOULD LIKE WCC TO MAKE IS:**

RDK requests that WCC reject the application in full on the grounds articulated by RDK in our submission and request that Ryman prepare a new plan and supporting information that addresses the concerns raised within this submission, including a materially de-scaled development.

RDK also requests that Ryman be required to undertake meaningful consultation with the community in the development of a new plan for the site.

#### **DELEGATION**

RDK understands that as a publicly notified consent, the application will be considered by an independent commissioner. Consequently, RDK does not offer a preference on whether, pursuant to section 100A of the Act, WCC delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

#### **ORAL SUBMISSION**

RDK wishes to speak in support of the submission.

#### **CORRESPONDENCE**

Please serve correspondence to RDK by email.

[rdksociety@gmail.com](mailto:rdksociety@gmail.com) / [andrew@cooperassociates.co.nz](mailto:andrew@cooperassociates.co.nz)

#### **SIGNATURE**



16 May 2022

Date

Andrew Cooper

Chair

Responsible Development Karori Inc

## Appendix 1 – District Plan considerations

The key outcomes sought by the objectives and policies in the District Plan relating to the Outer Residential Area (ORA) Zone, as relevant to the Ryman assessment are listed below. The assessment fails against all but one of the objectives:

- *The achievement of residential intensification, provided that it does not detract from the character and amenity of the existing neighbourhood* – the extreme densification of the Ryman proposal leads to a development that is out of proportion with the neighbourhood, breaks many of the rules for ORA, has minimal setbacks, has large scale buildings that dominate the surrounding single dwelling residences. As a consequence, the development substantially detracts from the character and amenity of the existing neighbourhood.
- *New development that acknowledges and respects the character of the area, is of an appropriate scale and intensity, and is compatible with surrounding development patterns and its amenity value* – As per comment above, the development is not of an appropriate scale and intensity for the area.
- *The provision of on-site, ground level open space as part of new residential developments so as to enhance visual amenity and assist with the integration of new developments into the existing residential environment* – other than retention of the small ‘pocket park’ on Donald St, the existing open space is closed off to the public with large scale buildings dominating the public boundaries and surrounded by secure fencing. Consequently, the visual amenity is detracted, rather than enhanced, and the site does not integrate with the existing residential environment. The site also does not provide ground level open space at a scale commensurate with the development size for its residents.
- *The encouragement of residential development that increases opportunities for open space and minimises hard surfaces* – As per note above, open space is lost and the site will be bordered by large dominating buildings and secure fencing. The development increases rather than minimises hard surfaces, with the impermeable surface area of the site increasing by 17%.
- *The provision of multi-unit developments that provide high quality living environments that avoid or mitigate adverse effects on neighbouring properties* – the development creates significant adverse effects on neighbouring properties through adverse visual effects, loss of privacy, increased shading, loss of open space and overbearance. The orientation and overbearance of the buildings proposed, together with a lack of open space and walking opportunities for residents does not provide a high quality living environment.

*A multi-unit development as a restricted discretionary activity on the Site is subject to compliance with a building height of 8m and a maximum site coverage of 35%. All buildings on the site exceed 8m and the site coverage will be 47.1%.*

Clause 5.3.4.16 of the District Plan states that the maximum building height stated for the ORA of 8m must not be exceeded by more than 20% - Buildings B02-B07 exceed the standard by an average of 37.5%, while Building B01 exceeds the standard by over 160%.

Policy 4.2.3.1 states that the policy rules are “designed to ensure that development can proceed with some restrictions to maintain the primary visual character of residential neighbourhoods.” The proposal is inconsistent with maintaining the primary visual character of residential neighbourhoods.

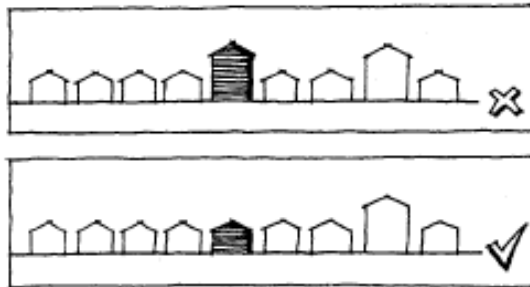
While the Plan provides for multi-unit residential developments, Policy 4.2.3.1 references “comprehensive townhouse developments as well as additional detached dwellings”. This statement indicates that the policy did not envisage multi-story apartment blocks in the Outer Residential Zone in the midst of mostly single-story character dwellings. The policy also states that “multi-unit housing can significantly alter neighbourhood amenity”. And that “any new multi-unit development must give careful consideration to the scale of existing housing, and reflect this scale in the design, layout and scale of the proposed development.” Given the predominance of mostly single-story character dwellings of the surrounding neighbourhood, the proposal in no way reflects the scale of existing housing.

## Appendix 2 – WCC Residential Design Guide

With reference to the WCC Residential Design Guide (RDG), the proposal fails on numerous counts.

### RDG G1.6 – Height

Where height is a significant character issue, relate the height of new development to that of buildings within the immediate area.



*Maintaining similar height at the street edge in areas characterised by consistent height*

At a minimum of 11m in height all buildings in the development are of a scale that is inconsistent with the RDG.

### RDG G1.7 Plan dimensions and siting

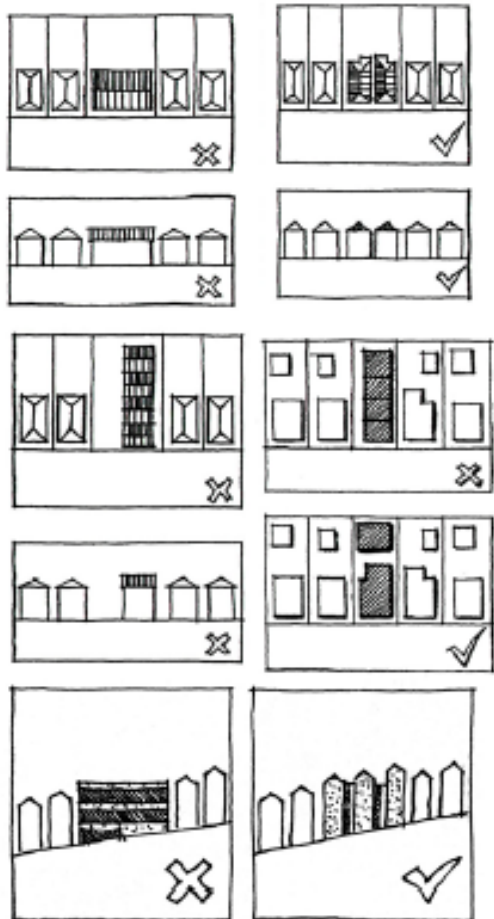
Relate to the existing pattern of building dimensions, frontage widths and spaces between buildings by considering, where applicable, the following design techniques:

- Grouping units together into modules that relate to the dimensions of buildings typical for the neighbourhood;
- Expressing the form of each unit, or groups of units (whichever is more consistent with the predominant dimensions of buildings in the immediate area) with a separate roof, and/or differentiating individual units or groups of units by varying colour and materials;
- Offsetting units in plan, introducing gaps or creating slots between blocks with dimensions that relate closely to those existing to give visual separation between dwellings;
- Offsetting units vertically, introducing height variation to articulate building bulk;
- Using transitional forms and volumes to achieve a relationship between a large new development and smaller neighbours.

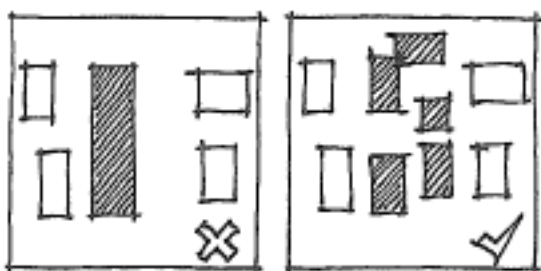
Variation in alignment and form, or both as required, can be used to achieve a scale relationship between relatively large multi-unit development and neighbouring small scale detached dwellings.

Large multi-unit residential developments can become visually dominant if they are of a type and size that contrasts significantly with an existing pattern of detached dwellings in a residential area. Strict alignment of connected identical dwellings means that a group of individual dwellings will usually read as a single, very large building. This is detrimental in areas characterised by relatively small scale detached dwellings.

Gaps break down bulk and allow scale relation with smaller neighbouring buildings, and also can allow glimpse views through for neighbours. Spacing between primary forms should relate to typical local patterns. Transitional volumes of intermediate scale can mediate at the interface between smaller or larger developments on neighbouring sites.



*Maintaining the rhythm of buildings along the street edge in areas of consistent character*



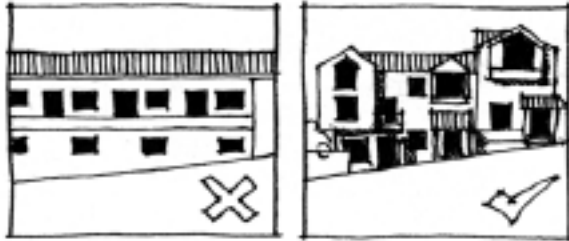
*Modulation of plan form to achieve relationship with neighbouring buildings*

### **RDG 3.19 – Individual identity**

Consider the modelling of multi-unit building form to achieve a sense of individual identity and address for each dwelling.

The way individual dwellings are sited, and their degree of connection with or separation from others determines their degree of individual identity or "sense of address". This, aided

by the way their entrances are designed and built, can give the privacy and image qualities of an individual dwelling on its own site, even within a multi-unit development. When applied to apartments, this consideration may mean only expressing the extent of each apartment on the façade, as the address for the apartment is typically a common entry lobby.



*Sense of individual identity and address for townhouses*

As emphasised by the above guidance images and definition, the Ryman proposal bears no acknowledgement to the height, spatial or identity principles contained in the WCC RDG.



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Tuesday, 17 May 2022 1:58:00 pm

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## Submitter details

**First name:** David  
**Last name:** Jupp  
**Address:** 21 Scapa Terrace  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 021476676  
**Email:** davidwjupp@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

I oppose the application on the basis that the following may not have been considered in the preparation of the application.

1. Stormwater impact on neighbours where the flood plan crosses properties in Scapa Terrace.

I understand that stormwater in the 900mm stormwater that crosses Scapa Terrace through to the site plus the Scapa Terrace stormwater and additional stormwater from the site increased impervious area will discharge into the 1,500m<sup>3</sup> attenuation device.

I understand that the stormwater will then be discharged at a slower rate to the ongoing existing stormwater network. Should the attenuation device reach its capacity due to a reduced discharge caused by deterioration over time then a backup will occur in the 900mm stormwater that crosses Scapa Terrace with potential ground overflow through Firth Terrace and Scapa Terrace properties.

The documentation mentions Donald Street and Campbell street but consideration of properties in Scapa Terrace does not appear to have been considered.

2. Road Safety

The documentation includes traffic volumes for Donald Street, Campbell Street and Karori Road for 2015 and 2019. There does not appear to be any consideration of traffic volumes for Scapa Terrace and Firth Terrace.

Both of these streets are used by vehicles to access Karori School children drop off / pick up in Donald Street and by vehicles bypassing the congested Karori Road route to the city. Traffic volumes appear to increase during inclement weather periods when more parents drive their children to school and more workers take their cars to work.

While the number of onsite car parks appear to meet the minimum there will probably be use of adjacent streets for staff and visitor parking.

Scapa Terrace is used by many children to walk and scooter to and from school. Many are

accompanied by parents but there is a reasonable number walking alone. With car parking on both sides of the Scapa Terrace two-way traffic movement is restricted and likely traffic volumes will increase for access to the main site entry on Donald Street. Consideration should be given to the road safety for children and adults using Scapa Terrace.

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**

The reasons for my submission are that I am a resident of Scapa Terrace and the development will impact on my property and my neighbours.

**The decision I / we would like Wellington City Council to make is:**

The decision I would like is for the Wellington City Council to require the developers to investigate and report on the issues I have raised and the Council to require changes to the proposed plans where necessary. The Council to also include any conditions in the consent to resolve the issues identified.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Tuesday, 17 May 2022 2:05:59 pm

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## Submitter details

**First name:** Lina  
**Last name:** Hao  
**Address:** 40 Campbell Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0221586365  
**Email:** sunshinecosmos@gmail.com

## Application details

**Applicant name:** Lina Hao  
**Site address:** 26 Donald Street  
**Service request number:** SR 471670  
**Submission:** I / we support the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

**Aspects of the application that you support or oppose:**

**Aspects of the application that you are neutral towards:**

**The reasons for my / our submission are:**  
Support the community

**The decision I / we would like Wellington City Council to make is:**

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Tuesday, 17 May 2022 3:19:27 pm

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## Submitter details

**First name:** Peter  
**Last name:** Taylor  
**Address:** 21A Campbell Street  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0211693774  
**Email:** peter.r.taylor21a@gmail.com

## Application details

**Applicant name:** Mitchell Daysh Ltd on behalf of Ryman Healthcare Ltd  
**Site address:** 26 Donald Street and 37 Campbell Street  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:** 15 mins  
**If others make a similar submission:** I / we will consider presenting a joint case with them at the hearing

**Aspects of the application that you support or oppose:**  
Visual impact, residential amenity and traffic implications

**Aspects of the application that you are neutral towards:**

### The reasons for my / our submission are:

Visual amenity - building B01B will have a detrimental impact on our visual amenity of our property. It is much closer than the old tower block and will be much more noticeable and intrusive. Whilst the experts consider the overall impact of the development to be low to moderate, or even positive, they acknowledge that the assessment is subjective. As the experts will not be affected and will not appreciate the extent of the impact, it is difficult to accept their assessments.

Residential amenity - the development has removed significant residential amenity by the removal of the netball and tennis courts along with the open grassed area currently used by the community. There are no replacement facilities. There is reference in the WCC expert report to access to parks. There is one park in the area. Ben Burn Park is more of a playing field for organised weekend sports, such as soccer and cricket. There is also reference to walkways but there is no detail. Most walkways are steep bush walks. There is already a lack of residential amenities in the area.

Traffic Assessment - the assessment fails to properly assess the overall impact on traffic. The assessment in support of the application is based on 2019 data - some 3 years old and is unreliable given the extent of increased traffic in the general Karori area. Given the extent of the development it would be reasonable to expect the applicant to have carried out a more up to date assessment - monitoring of traffic at the two relevant intersections with Karori Road. The dates of the monitoring are relevant. The monitoring in 2019 took

place mid-week, Tuesday and Wednesday and there was no assessment of impact on weekends when there is a general increase in traffic more constantly throughout the day - eg for sport, shopping etc. and there will likely be more travel movements associated with the development. Further it will not have taken account of the absence of the University student traffic.

The assessment fails to adequately account for the impact on Karori Normal School where there is already congestion at the beginning and end of the school day. For such a large development the developer and/or WCC should invest in the traffic infrastructure to allow for better vehicle management in Donald Street, the intersection of Campbell Street and Karori Road and the potential development proposed by WCC at the corner of Campbell Street and Karori Road.

Given the out of date traffic analysis it can only be assumed how extensive the impact on traffic will be. The data for 2015 and 2019 showed a significant increase in pm peak traffic of some 135% and 111% for am peak. The increase is assumed to have occurred without the impact of college of education traffic in 2019 and so the increase in principle would be greater as the 2015 data should have had the education college traffic removed. Allowing then for the increase in traffic generally from 2019 and the impact of the proposed development it is possible that there will be in excess of a 150% increase in both am and pm peak traffic. That is very significant and there are no proposals to address the impact.

Of course even looking at just the increase in traffic movements ignores the congestion that exists in the data both am and pm peak. The overall access to Karori is severely congested at peak times and the development will exacerbate that congestion. WCC fails to adequately address that overall existing congestion.

**The decision I / we would like Wellington City Council to make is:**

Generally we do not object in principle to a retirement home development. It is more the size and impact on visual amenity, residential amenity and traffic. A modification to the height of building B01B would mitigate the impact visually. Investment in community facilities within the immediate vicinity would mitigate the removal of the existing amenities, whether funded by the WCC or applicant. There needs to be better intersection controls for Campbell St/Karori Rd - traffic lights or roundabout and better traffic management for the impact on Karori Normal School and the swimming pool. Ideally, it would also be helpful if the WCC had a better traffic management plan for Karori Road to address the increasing traffic volumes generally. It seems the WCC will be considering this application in isolation from the ongoing increase in residential density in Karori, which it encourages, without addressing the key issue of access to Karori.

**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for 471670  
**Date:** Tuesday, 17 May 2022 3:48:27 pm

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## Submitter details

**First name:** Catherine & Michael  
**Last name:** Hallagan  
**Address:** 42 Campbell Street  
**Suburb:** Karori  
**City:** WELLINGTON 6012  
**Phone:** 0272707680  
**Email:** hallagan@xtra.co.nz

## Application details

**Applicant name:** Mitchell Daysh for Ryman Healthcare Ltd  
**Site address:** 26 Donald St and 37 Campbell St, Karori  
**Service request number:** 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

We will be close neighbours of the Ryman's Retirement Village if it is built in Karori.

The aspect of the application that we oppose pertains to CAR PARKING.

- We have concerns re the fact that Ryman's states in its proposal under 7. TRAVEL PLAN that "staff parking is provided at a rate of 1 space per 2 staff members." Essentially, this means that 50% of its work force will not have certain access to a car park. Our preference is that Ryman's, as an employer of note, should provide sufficient parking for all of its staff. In our view, it's simplistic for Ryman's to say in its travel plan "private vehicular travel will usually be outside of peak periods.." Ryman's gave minimal evidence to support this claim. Instead, Ryman's presumes that because public transport exists nearby, that most of its staff will catch buses, or else walk or cycle to and from work. We disagree!
- We think that that there is a high probability that large numbers of Ryman's staff will drive their cars to work. They will choose to do this as it will be more convenient and more efficient for them than any other mode of transport. Then, because of insufficient on-site parking, they will leave their vehicles on the surrounding streets during their shifts. The streets affected will include Campbell St, Donald St, Cargill St, Cooper St and Scapa Terrace. Parking outside Ben Burn Park might also be compromised by being blocked for long periods by Ryman's employees' cars.

The tranquillity of these suburban streets and the safety of the children entering and exiting Campbell St Kindergarten, Karori Normal School and the Karori Swimming Pool are likely to be impacted adversely.

- We are not satisfied with the comments in the written application from Ryman's in which

the developer states in its conclusion re Parking "No parking overspill is expected". This bold expectation is just that "an expectation" which is not evidence-based at all. One only needs to visit the closest Ryman's Retirement Village to Karori, namely Malvina Major in Broadmeadows, for proof that this expectation is false. If one goes to Burma Road, you will observe that the street frontage that runs the length of Malvina Major Retirement Village, is full of cars parked on both sides of the road for extended periods of every day! We anticipate that this is exactly what will happen in the streets named above, particularly in parts of Campbell and Donald Streets closest to the Karori Ryman's Retirement Village.

Ryman's states at the end of 7. TRAVEL PLAN "In light of the assessed transport effects and staff travel characteristics, we do not consider a staff travel plan is necessary for the Proposed Village." (sic)

We urge the Wellington City Council to insist that Ryman Healthcare Ltd must present it with three more pieces of information before a Resource Consent under S95A of the RMA 1991 can be granted:

1. A comprehensive Staff Travel Plan
2. A detailed Traffic Management Plan
3. An expanded Parking Plan with provision of additional on-site staff car parks

It is imperative that the wellbeing and physical safety of its closest neighbours is considered by Ryman Healthcare Ltd while it plans to build a new community for the elderly.

We want Ryman's to continue to engage positively with its closest neighbours.

In alignment with Ryman's own ethos "Everything we do must be good enough for Mum - or Dad."\* And one day that may be us!

Ultimately, we hope that the residents and operators of this proposed Retirement Village feel welcome in Karori.

Kind regards

Catherine & Michael Hallagan

\* Source Ryman Healthcare Website accessed 1500hrs, 17 May 2022

### **Aspects of the application that you are neutral towards:**

### **The reasons for my / our submission are:**

Please see reasons outlined above in the box headed : Aspects of the application that you support or oppose.

### **The decision I / we would like Wellington City Council to make is:**

We urge the Wellington City Council to insist that Ryman Healthcare Ltd must present it with three more pieces of information before a Resource Consent under S95A of the RMA 1991 can be granted:

1. A comprehensive Staff Travel Plan
2. A detailed Traffic Management Plan
3. An expanded Parking Plan with provision of additional on-site staff car parks

In summary, it is imperative that the wellbeing and physical safety of its closest

neighbours is considered by Ryman Healthcare Ltd while it plans to build a new community for the elderly.

We want Ryman's to continue to engage positively with its closest neighbours.

In alignment with Ryman's own ethos "Everything we do must be good enough for Mum - or Dad."\* And one day that may be us!

Ultimately, we hope that the residents and operators of this proposed Retirement Village feel welcome in Karori.

\* Source Ryman Healthcare Website accessed 1500hrs, 17 May 2022



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR 471670  
**Date:** Tuesday, 17 May 2022 4:13:43 pm

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## Submitter details

**First name:** Mark  
**Last name:** Moore  
**Address:** 17 Paddington Grove  
**Suburb:** Karori  
**City:** Wellington  
**Phone:** 0272540379  
**Email:** msmoore66@gmail.com

## Application details

**Applicant name:** Ryman Healthcare Limited  
**Site address:** 26 Donald Street and 37 Campbell Street, Karori  
**Service request number:** SR 471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we do not wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:**

### Aspects of the application that you support or oppose:

We support residential intensification and the use of the old Teachers College site for a retirement village however we oppose the proposed Ryman development for the following reasons:

- Shading effects.
- Loss of privacy and enjoyment of my property
- Construction physical impacts – dust, and ground movement.
- Construction noise - not acceptable to have construction 6 days a week for 3 years or more in a residential area where many, if not most, families have young children.
- Over-bearing of buildings
- Building scale out of character and dominating effect over surrounding residential area.

### Aspects of the application that you are neutral towards:

### The reasons for my / our submission are:

#### OUR REASONS FOR OPPOSING THE DEVELOPMENT

Shading, loss of privacy & over-bearing and out of character buildings

- I live on Scapa Terrae and the size of the proposed buildings will completely dominate the outlook from my backyard. This is a north facing outdoor living space.
- Our skyline will be obliterated and we stand to lose significant sunlight from the shading effects of the new buildings. Primarily in two ways;
  - o From the 7-story building B01B casting a long shadow across our property from 1545 in the June winter solstice as per pages 72 onwards in the Detailed Plans including Shading Document. Shading Diagrams RCA72 to RCA74 illustrate this. While the current Malcolm building is actually taller, the increased mass of the B01B building causes greater

shadowing.

o As per the McIndoe Urban, Urban Design Assessment, the shading impact of the Ryman proposal on 8 Scapa Terrace would be between 10.45am – 4.30pm on the 22nd June and 3pm – 6pm on the 22nd September. This shading causes a loss of solar heating via the ceiling of the property and in turn will increase heating costs.

- Our family will spend a lot of time in the backyard and the over-dominance of the buildings will result in loss of privacy and enjoyment of our own property.

A mitigation to this is the existing boundary fencing that runs behind our property. It has a lot of mature foliage on it which would help with privacy as well as construction dust and noise impact.

We understand Ryman plans to have this removed, but we would argue it would benefit Scapa Terrace residents as well residents of the Ryman village for this to remain.

- Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.

- Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.

- Suggesting that the over-bearing of the proposed buildings will be mitigated by planting is insulting. Trees that are big enough to disguise the proposed buildings will take years to grow and will then likely generate even more shading on our property.

Noise – Construction and proposed carpark

- We are concerned by noise generated during construction. We work from home and have small children. While construction work during standard work hours is reasonable, construction during the weekend isn't acceptable.

- Weekend construction, or construction 6 days a week for 3 years or more, is not reasonable. If it was weekend construction for just a month at the end, that would be acceptable. But not if it's for 3 years or more.

- We are concerned by the noise of tyre squealing from the undercroft carparking that will be adjacent to my property.

- We expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal and that the southern façade comprises suitable noise attenuating materials.

Construction Physical effects

- I am concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honour their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.

- We are also concerned by the effects of ground movement from excavation and piling on my property and request that Ryman honour their original offer to neighbours impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

CONCLUSION

- Our Key concerns are the increased levels of shading we will experience on our property, the negative impact on outlook and enjoyment in our outdoor north facing area, the impact of noise from the proposed underground carpark and the negative impact from construction effects.

**The decision I / we would like Wellington City Council to make is:**

We request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours and prepare a new plan that is at an appropriate scale and character for the

neighbourhood.

**From:** [Margaret Gordon](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on the Resource Consent Application – 26 Donald Street and 37 Campbell Street, Karori  
**Date:** Tuesday, 17 May 2022 5:00:22 pm

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**Submission Details:**

Applicant: Ryman

Site Address: 26 Donald Street and 37 Campbell Street, Karori, Wellington

Proposal: The construction, operation and maintenance of a retirement village

Service Request Number: 471670

√ Support the application

**Submitter details**

Dr Margaret E. Gordon

41 Ngaio Road

Kelburn

Wellington 6012

New Zealand

Phone: +64 4 475-9925

Mobile: 021 0826 5533

[Email: margaret.gordon2015@gmail.com](mailto:margaret.gordon2015@gmail.com)

**The aspects of the application that I support are as follows.**

The proposed Ryman village will provide the inner western suburbs with the only such facility of sufficient size to accommodate the older residents in the part of Wellington they identify with. The existing villages are too small to do this.

The housing freed up by this will in turn provide the opportunity for younger people to move into these suburbs.

Ryman has been permitted to buy the land and invest heavily in the design and its revision, and also in the preparatory demolition of the buildings that were not suitable for conservation.

**Difficult aspects:**

The site has its challenges being on uneven land and partly on ground higher than its immediate surroundings, and concern has been expressed about building height and the detrimental effects on the early and late sun available to some neighbouring houses. Although this is unfortunate, if the village does not go ahead it would seem likely that the site would be bought by a developer of sufficient means to use the site for such building as apartments, which could well have at least a similar effect. I am not sure how the changes to resource consents for taller buildings in residential areas might apply to this site, but we have been told we must expect to accommodate more higher rise dwellings to keep our cities compact as the population increases.

I do not choose to make an oral submission.

Margaret Gordon

## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

Responsible Development Karori (RDK) opposes the application.

### Submitter Details

Name of submitter: Bernadette & Tristram Ingham  
Address of submitter: 22 Scapa Terrace, Karori, Wellington  
Mobile: 027 6003868  
Email: bernadette@ingham.net.nz

## SUBMISSION STATEMENTS

I/We support residential intensification and the use of the old Teachers College site for a retirement village however we oppose the proposed Ryman development for the following reasons: *[Delete any of the following that you do not wish to submit on]*

- Over-bearance of buildings
- Loss of privacy and enjoyment of my property
- Impacts on constrained infrastructure in Karori.
- Stormwater and wastewater analysis and limited mitigations.
- Building scale out of character and dominating effect over surrounding residential area.
- Building design and scale not consistent with WCC Residential Design Guide.
- Proposed planting of very large trees along southern boundary not suitable for residential environment.
- Shading effects.
- Wind impacts.
- Parking impacts.
- Noise impacts.
- Traffic impacts, particularly during construction.
- Construction impacts – dust, noise, ground movement.

## **OUR REASONS FOR OPPOSING THE DEVELOPMENT**

### **Infrastructure constraints**

- WCC's recent update to its District Plan, in which housing intensification and height levels have been increased in every other suburb in Wellington, left Karori's zoning and height limits unchanged at 8m height limit.
- This is because WCC has determined that the infrastructure in Karori cannot sustain high levels of intensification.
- Ryman's proposed development that will house around 400 residents will have significant impacts on Karori's constrained infrastructure, particularly its wastewater.
- The information contained in Ryman's consent application is limited to very old data from its own sites. There is no independent analysis on the flow rates from a site of this scale. There is no mitigation for the impact that the development comprising 400 residents will have on the infrastructure. This will impact all of the Karori community.
- The Teachers' College site is a floodplain. With the loss of the playing fields that acted as a soak pit, the increase in hard surfacing on the site, the poor state of Wellington's water infrastructure, I am concerned about the effects that high rainfall events will have on my property in Scapa Terrace.

### **Over-bearing and out of character buildings**

- We live on 22 Scapa Terrace, Karori and the size of the proposed buildings will completely dominate the outlook from our house.
- Our family spends most of our time in [front/side/backyard] and the over-dominance of the buildings will result in loss of privacy and enjoyment of our own property.
- Our skyline will be obliterated and we stand to lose significant sunlight from the shading effects of the new buildings.
- Very large buildings in place of gardens and open space cannot be considered a positive effect as stated by Ryman.
- Building heights ranging from 3 story (within 70m long continuous blocks) to 7 story buildings do not respond to the scale, character and amenity of the public streets and properties adjoining the Site.
- We completely reject the statement in the proposal that the development will have minimal or no impact on us as residence. To say that the over-bearing of the proposed buildings will be mitigated by planting is insulting. Trees that are big enough to disguise the proposed buildings will take years to grow and will then likely generate even more shading on our property.
- The stretch of boundary with our property cannot be planted due to the presence of critical stormwater infrastructure. This means that the proposed mitigations of tree plantings will not be provided for our property resulting in continued over-bearing and loss of privacy.

## **Wind**

- Karori is windy, with the Teachers' College site sitting directly in the path of the prevailing wind.
- We are very concerned that the height, length, rectangular shape and north-south orientation of nearly every building in the development will generate increased wind effects on our property
- Ryman's only mitigation appears to be planting in some areas which will take years to take effect.
- The wind assessment peer review appears to conclude that not enough has been done to mitigate the effects of excessive wind generated by the development.

## **Noise**

*[For those on the north side of Scapa Tce adjacent to buildings B01-B06]*

- We are concerned by the noise of tyre squealing from the undercroft carparking that will be adjacent to my property.
- We expect that a consent condition is to require suitable flooring material to be used in the undercroft carparking area to mitigate tyre squeal and that the southern façade comprises suitable noise attenuating materials.

## **Carparking and traffic**

- Of the 39 carparks available to staff and visitors, 3 are set aside for accessible parking and 2 for the village's vans, leaving a total of 34 available for staff and visitors.
- The Assessment of Environmental Effects states that 25 carparks are allocated for staff use. This leaves just nine (9) carparks available for visitors to the site.
- This number of carparks is completely inadequate for a village of this size. The neighbouring streets will become clogged with cars from Ryman's visitors and staff.
- We are very concerned of the effect that this will have on our property, as well as the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School and Donald Street pre-school.
- We are also very concerned by the amount of traffic that will be generated by the development and the impacts that this will have on the safety of our streets and in particular the safety of children around the local school, kindergartens and pre-schools.

## **Construction effects**

- We are concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honour their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.

- We are concerned by noise generated during construction. We work from home and have babies that sleep during the day, and the effect of 5 years of construction noise will have an impact on sleep deprivation and our mental health.
- 4-5 years of continuous construction traffic on our narrow residential streets will be extremely disruptive and dangerous particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood centres.
- We are also concerned by the effects of ground movement from excavation and piling on our property and request that Ryman honour their original offer to neighbours impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

**THE DECISION WE WOULD LIKE WCC TO MAKE IS:**

We request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours and prepare a new plan that is at an appropriate scale and character for the neighbourhood.

**DELEGATION**

We do not request, pursuant to section 100A of the Act, that WCC delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**ORAL SUBMISSION**

We wish to speak in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at the hearing.

**CORRESPONDENCE**

Please serve correspondence to me by email: [bernadette@ingham.net.nz](mailto:bernadette@ingham.net.nz)

**SIGNATURE**



**Date: 17 May 2022**



**From:** [Website Team](#)  
**To:** [BUS: Consent Submissions](#)  
**Subject:** Submission on notified resource consent application for SR471670  
**Date:** Tuesday, 17 May 2022 8:30:05 pm

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## Submitter details

**First name:** Margot  
**Last name:** KING  
**Address:** 15 Scapa Terrace, Karori, Wellington  
**Suburb:** Karori  
**City:** Karori  
**Phone:** 64212974792  
**Email:** mckpinot@gmail.com

## Application details

**Applicant name:** Margot King  
**Site address:** 26 Donald Street  
**Service request number:** SR471670  
**Submission:** I / we object the application  
**Oral submission at the hearing:** I / we wish to speak in support of mine / our submission  
**How long will you need for your presentation:**  
**If others make a similar submission:** I / we will consider presenting a joint case with them at the hearing

### Aspects of the application that you support or oppose:

- (a) Oppose Ryman attempting to override the district plan so that they can maximise profits by overloading the site with buildings and paying clients whilst minimising green spaces. The district plan applies to all other community members, which should include Ryman. Ryman's primary driver is profit, this should not be accommodated at the expense of our community.
- (b) Oppose the scale of the build as it does not fit with the character and residential nature of the area.
- (c) Concerns about our infrastructure to cope with the proposed development scale and resident numbers. As a reminder of our aging pipes we had water bubbling up in Campbell street last week.
- (d) Inadequate parking allowed for on site for residents, staff, visitors and service vehicles. Concerns over the ongoing disruption caused by increased traffic flow 24/7 and increased risks to pedestrians (particularly school/pre-school/pool kids).
- (e) Disruption during construction must be minimised for neighbours and environment. A plan be agreed with concerned parties.

### Aspects of the application that you are neutral towards:

Neutral to the concept of a retirement village on the site, just do not support Ryman stacking as many paying clients on to it as they can get away with.

### The reasons for my / our submission are:

Long-time and long-term community member who wants sensible decisions made for the community.

### The decision I / we would like Wellington City Council to make is:

To reject the submission from Ryman to override the district plan.  
To support a development that will be sympathetic to this residential area and ensure

ongoing enjoyment for all residents.

## Submission on resource consent application

### Submission details

Name of applicant: Ryman Healthcare Limited  
Site address: 26 Donald Street and 37 Campbell Street, Karori  
Proposal: To establish a comprehensive care retirement village  
Service Request No: SR 471670

We Oppose the application.

### Submitter Details

Name of submitter: Bruce and Miranda Major  
Address of submitter: 37 Donald St, Karori  
Mobile: 022-677-4054  
Email: major\_gales@hotmail.com

### SUBMISSION STATEMENTS

We support residential intensification and the use of the old Teachers College site for a retirement village however we oppose the proposed Ryman development for the following reasons:

- Scale of buildings and Shading effects
- Parking impacts
- Traffic impacts, particularly during construction
- Construction impacts – dust, noise, ground movement

Our house is almost directly across the road from the Donald Street proposed main entrance to the development site. The bottom floor of our house is a Pre-School (Donald Street Pre-School) so we have concerns not only as home owners but also as business owners. As owners of a Pre-School, the impact of the Ryman development on traffic safety for our Pre-School families and Karori Normal School families is of great concern.

## **MY/OUR REASONS FOR OPPOSING THE DEVELOPMENT**

### **Scale of buildings and shading effects**

- We live on Donald Street and the size of the proposed buildings will replace our skyline of gardens and open space and completely dominate the outlook from our front yard, our bedrooms and our Pre-School and we stand to lose significant sunlight from the shading effects of the new buildings.

### **Carparking and traffic**

- The number of onsite carparks seems inadequate for a village of this size and we are concerned the neighbouring streets will become clogged with cars from Ryman's visitors and staff in future years.
- We are very concerned of the effect that this will have on our property, as well as the impacts on users of the Karori swimming pool and parents and staff of Karori Normal School and Donald Street Pre-School. In non-Covid (non-working from home) times, a number of school parents leave their vehicles on lower Donald St and then catch the bus into town from Karori Road, so street parking is not just limited at peak times.
- We have 2 carparks for timed carparking almost directly opposite the proposed main entry on Donald St for our parents to safely drop off and pickup young children at our Pre-School and this can be any time between 8-9:30am and between 2:30-5:30pm.
- Donald St narrows approaching the proposed main entrance to the village and it is very tight for large vehicles turning right into the site, particularly with vehicles parked on the street. During the demolition phase we had numerous demolition vehicles using our timed parking or waiting in the middle of the road blocking traffic back up the hill to the school whilst they waited for clearance to get access to the site. There were also numerous vehicles (articulated trailers, cranes) that couldn't manoeuvre into or out of the site from Donald St and either offloaded diggers in the street or had to use the current Campbell St service entrance.
- During the demolition phase, larger site vehicles had to travel down Karori Road and turn left onto Campbell St, a wider collector road, and then left into the current service entrance way where there is plenty of off road space for larger site vehicles. Large site vehicles turning left at the Donald St traffic lights and then right at the Donald Street entrance with parked vehicles, the narrowness of the corners and street and oncoming vehicles caused numerous issues during the demolition phase. We are concerned that there will be further issues on Donald St if the current Campbell St service entrance way is replaced by the proposed undercroft entrance at the beginning of construction. As the site is built out we are also concerned that construction worker vehicles will be parked on the street before, during and after site hours, particularly if there isn't construction worker parking on site.
- We assume that for the new entrance on Donald St to be increased to 9m that other carparks on the street will be taken away, putting further pressure on parking at school drop off and pickup times and resulting in other users using our Pre-School carparks and our parents having to try and find parks further away.

- As there doesn't appear to be room for a right turning bay into the proposed main entrance on Donald St, we are concerned about traffic buildup and risk of accidents with parents getting their children in and out of cars for our Pre-School, Karori Normal School or Karori Pool.
- We are also concerned that traffic coming out the site on Donald St will have limited visibility of children from Karori Normal scootering and running down the hill due to the proposed street side apartment building, parked cars and the slope of the hill. We would strongly suggest that Ryman place a judder bar before the footpath at the main entrance driveway on Donald St.

### **Construction effects**

- We are concerned by dust generated from construction, particularly given the windiness of the site and request that Ryman honour their original offer to neighbours impacted by the development to have their houses washed periodically during the construction phase.
- We are concerned by noise generated during construction. We work from home and have a Pre-School of small children and the effect of 5 years of construction noise will be significant.
- 4-5 years of continuous construction traffic on our narrow residential streets will be extremely disruptive and dangerous particularly due to the very large trucks passing by the front gates of the local primary school, the swimming pool and early childhood centres.
- We are also concerned by the effects of ground movement from excavation and piling on our property and request that Ryman honour their original offer to neighbours impacted by the development to have their homes assessed pre and post construction and to rectify any movement or shaking impacts on homes from the construction activities.

### **CONCLUSION**

- We are concerned that Ryman's plan doesn't include a final traffic management plan within the consent application that will ensure the safety of children from the local School, Pool and Early Childhood Centres and the impact on parking and traffic flow during and after the construction phase. We suggest that during the construction phase, Campbell Street is used as the main entrance and Donald Street as the main exit to reduce issues with site access, traffic flow and parking. We also suggest that Ryman include a judder bar near the footpath at the Donald Street entrance, to help ensure the safety of children travelling to and from Karori Normal School. We also suggest that traffic flow and parking issues will be reduced if the scale and intensification of buildings on the site is reduced.

### **THE DECISION WE WOULD LIKE WCC TO MAKE IS:**

We request that WCC reject Ryman's application due to the effects that a development of this scale will have on the surrounding neighbourhood. Ryman should consult with its neighbours and prepare a new plan that is at an appropriate scale and character for the neighbourhood, with an appropriate traffic management plan.

**DELEGATION**

We do not request, pursuant to section 100A of the Act, that WCC delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**ORAL SUBMISSION**

We do not wish to speak in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at the hearing

**CORRESPONDENCE**

Please serve correspondence to me by email.

**SIGNATURE**

date

17/5/22

# Submission on resource consent application

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Notes for the applicant

Use this form to make a submission on a resource consent application you support or oppose. You can also make a submission online, visit [wellington.govt.nz/have-your-say/public-notice](http://wellington.govt.nz/have-your-say/public-notice).

If you have any questions, visit [wellington.govt.nz/resourceconsents](http://wellington.govt.nz/resourceconsents), or email [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or phone us on 04 801 3590.

Send the completed submission via email to [planning@wcc.govt.nz](mailto:planning@wcc.govt.nz) or hand it in to us at: Resource Consents

Wellington City Council

PO Box 2199, 12 Manners Street, Wellington

## Submission details

Name of applicant: Ryman Healthcare Limited

Site address: 26 Donald Street and 37 Campbell Street, Karori

Proposal: Proposal to establish a comprehensive care retirement village

Service request number: SR 471670

Support the application

Oppose the application

Neutral

## Submitter details

Name of submitter: David Winston King and Anna Reese McKinnon-King

Address of submitter: 24 Scapa Terrace, Karori, Wellington

Phone (day): 027 399 7950

Mobile: 027 399 7950

Email: [mckinnonking@gmail.com](mailto:mckinnonking@gmail.com)

## Submission statements (use additional pages if required)

The aspects of the application that I support/oppose are:

We oppose the application in its entirety (while supporting the eventual use of the Site as a more modest retirement village proposal that meets tests for approval of consent under the RMA and the District Plan).

The reasons for my submission are:

The reasons for our submission are contained in the pages that follow. In essence, the application does not meet the test for a non-complying activity under the RMA, largely (but not only) due to the high adverse effects created by not meeting the height and site coverage standards under the District Plan.

The decision I/we would like Wellington City Council to make is *(include any conditions of consent you would like to see imposed)*:  
To deny the application. To invite the applicant to resubmit a plan that creates only minor adverse effects and/or is not contrary to the District Plan.

Note: *\*Select one.*

I request/ do not request\*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

#### Oral submission at the hearing

I/we wish to speak in support of the submission  
I/we do not wish to speak in support of the submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing

Signature(s) of submitter(s) or agent of submitter(s)\*

David King and Anna McKinnon-King

Date

18 May 2022 (note the Council has indicated to us that it will accept a submission on this date)

#### Note:

- The Council must receive this submission before the closing date and time indicated in the public notice. A copy of this submission must also be given to the applicant, as soon as reasonably possible, at the applicant's address for service.
- All submitters will be advised of hearing details at least 10 working days before the hearing. If you change your mind about whether you wish to attend the hearing, please phone 04 801 3590 so that the necessary arrangements can be made.
- This is not a statutory form, but is provided as a guide to people wishing to lodge a submission.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it contains offensive language
- it discloses no reasonable or relevant case
- it is supported only by material that purports to be independent
- it would be an abuse of the hearing process to allow the submission expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.  
(or the part) to be taken further

#### Privacy information

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified resource consent process. All information collected will be held by Wellington City Council, with submitters having the right to access and correct personal information.

#### How do you wish to be sePved with any correspondence

via email (please ensure you have provided your email address on page 1)

via post, ie hardcopy



## **SUBMISSION ON RESOURCE CONSENT APPLICATION SR 471670**

### **Introduction**

1. This submission analyses the Resource Consent Application SR 471670 by Ryman Healthcare Ltd (Ryman) to build a Proposed Retirement Village (PV) on the former Teachers College Site (Site) in Karori, Wellington.
2. It concludes that the application meets neither of the statutory tests for a non-complying activity under S104D of the Resource Management Act. The adverse effects of the PV will be significantly more than minor and the activity is contrary to the District Plan of the Wellington City Council.
3. In making the above assessment we tautoko the submission of Responsible Development Karori (RDK).

### **Background of the submitters**

4. We, David Winston King and Anna Reese McKinnon-King, are the owners of 24 Scapa Terrace, a 2-storey house adjoining the Site on its southern boundary, overlooking the part of the Site that is currently open field. We have owned the house since 2008 and raised our family there.
5. I, David King, was a senior public servant for 20 years. My career was in the domain of policy analysis and policy advice. During this career I led the design, development, (early stage implementation) and/or evaluation of a number of significant (and effective) regulatory frameworks. I am now an independent public policy analyst, with my focus areas including constitutional and public administration matters.
6. This is my (David King's) first exposure to the Resource Management Act (RMA) and it is a highly impenetrable regulatory design, where the average citizen would struggle to establish what the law is and advocate in regard to their interests under it, even on relatively minor matters within the 20 working day provision for submissions under the RMA.
7. I (David King) am also a disabled person, having a mental health disability, namely major depressive disorder. This disorder has affected me through much of my life. I experienced particularly severe depression during the years 2020 and 2021.
8. I, Anna McKinnon-King, was a Senior Private Secretary to the Deputy Prime Minister, prior to becoming primary care-giver for our children. I now work again within the Parliamentary Precinct.

## **Description of the PV**

9. We do not here replicate the description of the nature of the PV contained within the application. The descriptions of the PV within the Ryman' application are on the whole sufficient for our purposes
10. We note, however, that no 'bird's eye' views of the PV have been provided so that residents can have a sense of the PV as a whole (in fact one of the best bird's eye view would – drone aside – be provided from our 2<sup>nd</sup> story windows facing the PV).
11. We also note that there are serious problems with the image of the visual effect of the PV from our outdoor area provided by Ryman; we will draw attention to these deficiencies at the appropriate point in this submission.
12. Our property lies 'between' buildings BO2 and BO3 in the PV. This means that under the PV we will look out directly upon two (stepped to) 11 plus metre high buildings of 19 metres width and 70 plus metres length, with limited space between them. Barracks seems an appropriate analogy for these buildings, mitigations notwithstanding.
13. In addition, a principal driveway for residents' parking is to be established over our back fence, where no such driveway currently exists.

## **Limitations on our analysis**

14. At law we have had 20 working days to submit on the Ryman' application.
15. By virtue of this limited timeframe, it has proved impossible to digest, analyse and obtain expert advice on an application of this scale in order to make a completely thorough submission.
16. This submission is limited, therefore, by this factor. Nonetheless we consider we have got to grips with the heart of the issues raised by the application, and but for any limitations expressly stated in this submission, stand by our submission as having been made in good faith on the best possible analysis of it within the constraints mentioned.
17. We note the recent comment to me (David King) by a senior Ryman' executive that residents had had plenty of time to prepare submissions because the application had been in for some time. We find this quite frankly insulting and ableist in nature (given my severe depression over 2021 and 2022).
18. Given the length of time which Ryman has taken to initiate public consultation, there has been considerable uncertainty about whether the proposal would go ahead or not, or whether it would be withdrawn, as an earlier application had been. In these circumstances of uncertainty, it makes no sense for residents (let alone a person in

my, David King's state of health) to invest deeply in understanding the nature of the issues involved, let alone incur the cost of expert advice on matters arising.

19. This caution has proved appropriate as crucial documents in the application have been superseded by subsequent replacements in the lead-up to the activation of the initiation of the public submission process.

### **Legal framework for considering the application**

20. It is important to state at the outset that this is an application for approval of a **non-complying** activity. By definition, it does not comply with the District Plan.
21. The law, rightly therefore, sets a very high bar for such an application to succeed as, by definition, it is not something that the surrounding community could reasonably anticipate would take place within its environment.
22. The law, rightly therefore, does not permit any consideration to be given to the positive benefits an activity may have. All that matters, because this is what justice deems to be required in such circumstances, is whether adverse effects are minor or whether the activity is not contrary to the objectives and policies of the District Plan.
23. It is also important to state at the outset that this is an application for consent for non-compliance in regard to two of the most important factors there can be for creating potential adverse effects on a neighbourhood and adjoining properties, namely the height of buildings associated with the activity and the proportion of the site that is covered.
24. Not only that, but the application is for non-compliance of these two factors in combination; not only is the Site non-compliant in terms of site coverage, but that part of the Site that is to be covered will be covered with buildings with non-compliant heights.
25. This submission therefore focuses to a significant degree on the effects on the amenity values of the neighbourhood, including adjoining properties of an activity which is non-compliant in terms of site coverage and of height and the combination of these important effects.
26. In doing so, we naturally consider the mitigations Ryman says it has put in place in its design of the PV. We note, however, that mitigations, however neighbourly in intention, are only relevant if they meet the high standard set for approving a non-complying activity, namely by reducing any adverse effects to minor in nature or by working together to make the activity not contrary to the District Plan.

### **Potential factors influencing weightings given to submissions**

27. Before proceeding to consider the effects of the PV, we consider it important to address three factors where it is possible that decision makers may risk giving undue

weighting to submissions due to unconscious bias (this term is not used pejoratively – it is a well-understood neuro-psychological phenomenon which we all suffer from and must, in decisions of significance, work to safeguard against). Usually, substantial conscious reflection on the potential influence of these factors is required to mitigate this risk.

### *NIMBYISM*

28. First, it is natural in our society to consider NIMBYs, those who do not wish some activity to take place over their fence, as it were, to be selfish in nature and, therefore, for their submissions to be discounted.
29. NIMBYism is not in fact selfishness. It is an appropriate response to a missing insurance market. We all as householders face the risk of something being built in our 'backyard' which impacts significantly on the amenity values of our residence. However, we cannot insure ourselves against such a risk.
30. Normally what happens where there are missing insurance markets is that these risks are socialised. Those who are required to have a structure or activity built in their backyard that benefits the wider community at a cost to themselves, are reimbursed for that cost by the community (either through the government or the cost causer on behalf of the community).
31. Unfortunately, New Zealand has not addressed this problem with the result that those who are asked to bear a benefit to the whole community at a cost to themselves have the only avenue available to them of pointing out the adverse effects upon them of, and where reasonable opposing, the development given its cost to them. They are then disparagingly and unfairly called NIMBYs by others (strangely enough until the time when those others face a similar situation).
32. The risk of unconscious bias against those who are adversely affected by a development must therefore be guarded against.
33. For the record, we are perfectly comfortable with an activity in our backyard so long as it meets the statutory requirements for such an activity to go ahead. In this sense we are not stereotypical NIMBYs.

### *The rising elderly population, the need for retirement villages, the need for housing*

34. The second potential unconscious bias that needs to be taken into account is the prevailing views within society that there is a housing crisis, that freeing up housing would therefore be a good thing, that there is a need for more retirement villages, and that therefore the building of retirement villages is also a good thing. In short, the view may be that there needs to be a very compelling reason not to allow houses to be freed up and retirement villages to be built.

35. This may be all very well, but as the proceeding section makes clear, this is a matter of law and the potential benefits of an application are not to be taken into account in consideration of a non-complying activity.
36. Given the potential for unconscious bias in regard to the potential positive housing effects of the PV and consequent discounting of adverse effects, it is important to point out that the benefits of the PV are not as clear-cut as Ryman argue.
37. Crucially, the evidence Ryman presents for a crisis in retirement housing is out of date (dating from 2010); we can have no confidence that insufficient retirement housing is being developed or will be developed throughout New Zealand or the Wellington region to meet demand.
38. In addition, Ryman provides no evidence for the demand for a retirement village in Karori. According to them the suburb is awash with elderly people sitting in family homes close to their loved ones, with high demand for a retirement village in Karori.
39. We are well-established in the Karori community and have little awareness of this group of people. Most elderly people we know are more interested in escaping Karori's climate to a village up the Coast, still close enough to family to have a quality retirement.
40. One might argue that Ryman are no dummies; if they think there is a market for such a retirement home then it is there. But every business venture is attended with risk and eventually even the most successful business makes a catastrophic business decision. Ryman, as shown throughout this submission, have demonstrated they have limited knowledge of the Karori environment.
41. Consequently, we should not take the provision of much needed retirement housing or the freeing up of local family homes as a result of the PV as a given. There is the potential for the PV to be a white elephant.
42. Finally, just because a PV is proposed on the site, does not of itself mean that it is an efficient use of natural and physical resources under the RMA. Efficient use means the maximisation of productive, allocative and dynamic efficiency. There is a distinct possibility Ryman is over-intensifying this site in order to extract supernormal (ie more than the risk-adjusted rate of return) profits from the Site.
43. If this is the case, then the PV is an inefficient use of resources; the excess investment in the PV should be allocated by Ryman to other retirement village opportunities; it is only thus that natural and physical resources are efficiently used.
44. Ryman has provided no information on its rate of return on this investment. Consequently, there is no basis for determining if it is an efficient use of the Site. This matters significantly given the high standard that must be met to approve a non-complying activity.

45. In short, there a wide range of reasons for being alert to the possibility of unconscious bias toward a development that purports to increase housing supply and result in an increase in retirement accommodation. This risk needs to be safeguarded against through specific conscious reflection.

*Expert reports and Council Officers' opinions*

46. Another area where unconscious bias can arise is where experts and other people in positions of authority (such as Council Officers) proffer advice; as human beings there is a natural instinct to defer to opinion arising from a position holding expertise or status.
47. This is a particularly important risk in the most critical cases of expert testimony brought forward by Ryman (urban design, and landscaping and visual effects), given their relevance to the impact of height and site coverage effects. These experts purport to make their judgements based on their professional skills and experience. However, in all such cases there is a subjective element to the judgement made, and the judgement is essentially that of a reasonable person (admittedly informed by experience). That subjective judgement is capable of being influenced unconsciously by underlying self-interest.
48. Reflecting this possibility, all the experts commissioned by Ryman devise analytical frameworks that lower the bar for what an adverse effect is in Ryman's favour and their subjective judgements also concur with what is to Ryman's advantage.
49. These views, therefore, need to be discounted for potential unconscious bias, and the reasonableness of their judgements tested against the reasonable person views of submitters and, ultimately, of the decision maker(s).
50. We understand also that experts' views are accorded more weight in hearings than those of ordinary submitters because they have taken an oath to the Court to provide advice to the Court not to their client. We do not consider such an oath should be given undue weight given the propensity of experts (as described above) to coincide in their opinion with their client's views.
51. In this regard I (David King) note that my duty as a former public servant and independent policy analyst is to only provide advice that is consistent with the public good, including the rule of law. I apply this same duty in regard to private matters. I therefore submit that I am under an equal obligation to provide independent advice to the Court, not to advocate my self-interest (recognising the potential for unconscious bias on my part also).
52. We also observe that Council Officers too have applied their professional (ie subjective, reasonable person) judgements to the application by way of peer review. They have worked for long periods of time with Ryman on the development of this

proposal and have ended up using the same analytical framework and reaching by and large the same conclusion about the nature of effects.

53. There is clearly, in addition, to the risk of unconscious bias (perhaps a bias toward intensification over residential amenity), a risk that group-think has informed the frameworks that have been selected and the judgements that have been made. These risks also need to be taken into account.
54. To reinforce this risk, these Council Officers have not visited or talked with residents in developing their frameworks or reaching their subjective judgements. They now propose to be the neutral advisors to the Commissioners on the submissions made by residents, when they have already invested in a position without developing that position considering residents' views.
55. I (David King) have never come across such a faulty process in my regulatory career and would never contemplate any process where one formed a professional opinion without hearing from both sides first.
56. Consequently, the risk of unconscious bias toward experts and council officers' views (as well as the possibility of group-think) needs to be identified and guarded against through specific consideration of the risk.

### **The correct analytical framework for considering the application**

57. We now move to the question of what is the appropriate analytical framework for considering the Ryman's application.
58. We begin by advising that Ryman has used the wrong analytical framework for assessing the effects of the PV.
59. Ryman's argues that the effects of the PV must be considered in light of the fact that the Site is a windfall site under the District Plan and a 'landmark' Site of distinctive character within the Karori environment.
60. In light of these facts, Ryman argues that intensive development of a distinctive character (ie breaching both the building heights and site coverage rules) could be 'anticipated' or 'expected' upon the Site (in less polite terms, Ryman's are in effect saying that the residents of Karori and adjacent property owners are idiots if they didn't expect what Ryman are proposing, or something akin to it, to be built, non-compliant or not).
61. As a result of this analytical framework, throughout Ryman submission effects which would ordinarily (ie within this the usual framework applied) be considered moderate or high are downgraded to minor effects.
62. This analytical framework is adopted by Council peer reviewers (in accord with the risk of unconscious bias outlined above). In fact the Council peer reviewers take the

analytical framework further. One peer review describes the resulting effects as 'predictable' given the nature of the Site.

63. Another peer reviewer goes so far as to characterise the Karori environment as a mix of residential and 'institutional' buildings.
64. The use of the word 'institutional' clearly indicates a prejudicial disposition. There is only one institutional site in the Karori environment and that is the Site. The only other relevant buildings in the immediate vicinity are the Karori Normal School and the Karori Swimming Pool. It is ridiculous to characterise these as 'institutional.'
65. A fairer description of the environment would clearly have indicated that the surrounding environment is primarily residential with the one 'institutional' setting (being the Site). It would also note that the Site includes large areas of open space which have long been used for community facilities and seen as part of the Karorir environment.
66. As stated above, the analytical framework Ryman and Council peer reviewers adopt is wrong.
67. Yes, the Site can be considered a windfall site under the Plan. But the Plan is very precise in what it says about windfall sites. It says such sites **can** be suitable for more intensive development, but it is quite clear that this is because these sites generally do not come at the cost of neighbourhood character and that in establishing windfall sites its aim is to maintain character and amenity for those in the Outer Residential Zone of which we are a part.
68. Consequently, by implication, where development does come at a cost, a very thorough analysis of the impacts must be considered. And no implication can be drawn that the bar for what constitutes an adverse effect should be lowered. The effects need to be considered on their merits as is normally done, not discounted because this is a windfall site.
69. If the Council had intended for the bar to be lowered it is reasonable to expect that it would have said so, that rules would have been developed that did not limit the Council's discretion in regard to all applications, and that such developments would not have to be considered as non-complying consent application, which residents would not reasonably expect to be approved unless the normal standards were applied.
70. In addition, the windfall site classification needs to be understood in the context of the whole set of District Plan objectives and policies, not as a blunt instrument. This wider context time and again reinforces the need to balance intensification against residential amenity values.



71. Further discussion of this issue, including reiteration of some of the points made here appears later in this submission in the section where the RMA's s104D(1)(b) test is applied.
72. And, yes, the Site has a distinctive, even 'landmark' character. But that is a character that was clearly a result of an explicit decision by the community to trade-off having a (quite frankly, ugly and tall) set of buildings located in the least offensive part of the Site in return for extensive community facilities which have been a key feature of the amenity value of the Karori environment for some 50 years.
73. Yes, future development of the Site was provided for but the impact on the amenity values of the neighbourhood and adjacent properties was explicitly factored into the consideration of any such developments.
74. At no time has it been within the minds of Karori residents that as a 'landmark' Site, all but complete infill of the Site would or could be contemplated (even if it was a windfall site); such a development would fundamentally change the character of the environment and result in a significantly adverse effect on amenity values.
75. Consequently, the Ryman analytical framework is plain wrong and, quite frankly, displays an ignorance of the nature of the environment, reflecting the lack of time they have invested in getting to know the people in the area (particularly over the last 18 months to 2 years).
76. Consequently, our assessment of the effects of the PV is based on the ordinary standards that would be applied to the consideration of a windfall site, with no lowering of the standard to be applied to take into account the fact it is a windfall site, let alone a 'landmark Site.
77. Our application of this framework now follows. Where appropriate, we show that even if the Ryman's framework were adopted and we apply some lower standard, it still fails to meet the statutory tests by a significant margin.
78. As the timeframe for submissions does not allow for the commissioning, we use the reasonable person test, a test I (David King) have considerable experience in applying when it comes to designing regulatory systems and evaluating the effectiveness of systems and the decisions arising therefrom.

### **Consideration of specific effects of the PV**

79. We now move to the consideration of the specific effects of the PV using the correct analytical framework, as outlined in the previous section. In doing so, we follow the structure of section 5 of the Ryman's Assessment of Environmental Effects (AEE).
80. Where we do not comment on a particular matter (either within a part of or subpart of the AEE), this does not indicate agreement with the Ryman's assessment. Rather, it indicates that we have not had time, within the statutory timeframe for submissions,

to investigate the area concerned adequately. We have prioritised those effects where we have adequate expertise and knowledge to apply the reasonable person test and where the breach of building and site coverage standards are relevant.

81. Consequently, we focus on effects on the surrounding environment and on adjacent properties (with a particular focus on our address, given we know it most intimately).
82. Given the timeframe available and the number of expert reports, we cannot guarantee the accuracy of every statement we make about the Ryman's AEE. However, we have acted in good faith to do so as far as possible.
83. We do not consider the positive effects outlined by Ryman in section 5.2 of the AEE, for the reasons outlined earlier in this submission (their irrelevance to the application of s104D(i) of the RMA)

#### *Construction effects (section 5.3 of AEE)*

##### Dust (section 5.3.1)

84. Ryman submits that the effects of dust on the environment will be less than minor as a result of the applications of relevant standards and mitigation.
85. This stands in stark contrast with the comment of one Ryman's employee at a community open day that it is Ryman standard practice during construction to wash down neighbours' houses whenever that is needed because of the ongoing dust effects.
86. It also seems to not take into account the power and frequency of winds in Karori (let alone Wellington). These winds, when, as often, from the north impact on the properties south of the Site, particularly the properties adjoining the Site.
87. Given the above, it stretches credibility to conclude that there will be anything less than **at least moderate adverse effects from dust** during construction.
88. This assessment is elevated to **high adverse effects from dust** when one applies both s3(d) of the definition of effects in the RMA, the fact that there will be a cumulative adverse effect arising from the 36-40 month construction period, and s3(e), the fact that even if there is (and there is at least) a low probability of the adverse effect, it will have a high impact on those to the south of the Site given the cumulative effect under s3(d).

##### Construction noise and vibration (section 5.3.5)

89. Ryman's submits that mitigation options will be applied wherever full compliance construction noise and vibration standards cannot be met. **No evidence** is provided or assessment is given as to whether the adverse effects will be minor at most or

not. Nonetheless, Ryman concludes that the overall adverse effects of general construction will be less than minor with mitigations (section 5.3.6).

90. We question whether Ryman's assessment takes into account the strength and frequency of the northerly wind in Karori in its consideration of standards and mitigations (it certainly does not say that it has).
91. Given the above and taking into account s3(d) and s3(f) of the RMA, our assessment is that **the adverse effects of noise and vibration from construction are at least moderate.**

*Wastewater effects (section 5.4)*

92. We tautoko the submission of RDK on this section of the AEE. We particularly note the worrying disclaimer referred to by RDK about the condition of the pipe network.
93. Given the more than low probability of failure in the pipe network (given the condition of Wellington's infrastructure), but high impact of failure and the cumulative effects of such a failure, we assess the **adverse effects on wastewater to be high.**
94. If consent approval is being considered, approval of the application should not be given until Engineering Assessment has been completed and approved by decision maker(s) in this hearing (as opposed to the consent being approved and the Engineering Assessment completed thereafter, as proposed by Ryman). The risks of high adverse effects are too great otherwise.

*Stormwater effects (section 5.5)*

95. Ryman's assesses the adverse effects on stormwater to be less than minor.
96. A key assumption underlying this assessment is the modelling of the impact of a 1 in 100 year event of 12 hours duration.
97. A duration of 12 hours appears to us to be too conservative.
98. Given the continually deteriorating prospects of averting substantive, life-changing climate change, modelling a 1 in 100 year event on already potentially out-of-date predictions seems too conservative.
99. We are not in a position to remodel under a more severe or longer duration event. However, given the above, we submit that under sections 3(e) and 3(f) of the RMA **the adverse effects on stormwater will be at least moderate.**

*Geotechnical effects (section 5.6 of the AEE)*

100. Ryman submits that the geotechnical effects will have 'no noticeable' effects on the environment and adjacent properties.

101. The expert report does not consider applying or apply a s3(f) test.
102. Consequently, **the potential adverse geotechnical effects are possibly greater than minor**. Further, expert advice needs to be provided by Ryman on this matter.

*Heritage effects (section 5.7 of the AEE)*

103. Ryman submit that the heritage effects are minor adverse, given 'considerable' efforts have been made and 'cues taken' from the heritage effects of the Site in the PV design.
104. However, the assessment notes that the new buildings covering a substantial portion of the Site will not be perceived as having heritage value.
105. The fact is that the most important buildings reflecting the heritage value of the Site have been demolished, removing the substantive proportion of heritage value, and any retention of other buildings and taking of 'cues' from heritage values in them are minimal in impact given the context of the construction of a significant proportion of buildings that are new on the Site and out of character and, therefore, detract from heritage values.
106. Given the factors covered in the previous two paragraphs it does not seem un reasonable to conclude that **the effects on heritage are moderate adverse**.

*Arboriculture (section 5.8 of the AEE)*

107. We have no comment to make on this section of the AEE.

*Urban design (section 5.9 of the AEE)*

108. The Urban Design Assessment is a critical focus of our submission, given that it goes to the heart of the impact on the surrounding environment, including adjacent neighbours, through non-compliance with two critical standards: building heights and site coverage. These standards go to the heart of key amenity values: visual amenity (dominance and overlooking), privacy and shading.
109. Ryman submit that the Site is well-suited to the PV, that the infringement of the 8 m building height standard has been mitigated by Site layout and the progressive stepping down of building height, and that while the character of the Site 'will change', 'the change will better fit the surrounding residential context and therefore be positive.'
110. Ryman submit that there will be only minor adverse effects on a number of directly adjoining properties on Scapa Terrace (including our property, 24 Scapa Terrace) and our neighbour 49 Campbell Street.

Effects on the wider context and surrounding streets (sections 5.9.1.1-2)

111. We tautoko the submission of RDK on this matter.
112. Based on that submission, we submit that the **effects on the wider context and surrounding streets are high adverse.**
113. Based on an application of the Ryman (incorrect) analytical framework, we assess that the **effects on the wider context and surrounding streets are clearly no less than moderate adverse.**

Effects on public open spaces/recreational facilities (section 5.9.1.3)

114. We tautoko the submission of RDK.
115. We submit, in particular, that the lack of open space and/or recreational facilities for surrounding residents provided by the PV does not meet the reasonable expectations of residents and so significantly detracts from the amenity effects from public space and recreational facilities in the area.
116. These expectations are, under the correct analytical framework outlined earlier in this submission that, notwithstanding the Outer Residential Area zoning and windfall site nature, some provision would have been made for a public open space and/or recreational facility within the development to ensure there is minor detraction from the neighbourhood character.
117. The loss of community facilities on the Site has already detracted significantly from the amenity value of the immediate environment and put pressure on wider community facilities to accommodate the former demand made of the Site.
118. The loss of the remaining open space will drive the many dog walkers who use the Site to gravitate to Ben Burn Park, causing conflict between activities (to say nothing of health and safety risks) and consequent loss of amenity value for existing users of the Park.
119. Overall, our assessment is that **the effects on public open space and community facilities are moderate to high adverse.**

Effects on Karori Normal School (section 5.9.1.4)

120. We have no comment to make on this matter.

Effects on the public pedestrian way (section 5.9.1.5)

121. We have no comment to make on this matter.

### Effects on Neighbouring Residential Properties (section 5.9.1.6)

122. We tautoko the submission of RDK on this matter.
123. We make specific submissions in this section on the specific effects on our property, 24 Scapa Terrace (which, we repeat, is a 2-story residence currently looking over the open field space in the southwest end of Scapa Terrace).

#### **Visual amenity (dominance and overlooking) effects on 24 Scapa Terrace**

124. Ryman's submits that the dominance and overlooking effects on our property are less than minor owing to the design of the PV, particularly the 'generous' setbacks and stepping from two to three stories, as well as the impact of landscaping over time.
125. We repeat what we said earlier in this submission that we will be looking out upon two barracks-like buildings (mitigation notwithstanding) with limited space between them. The third story of these buildings, as best we can envisage them, will be visible from our primary living area and primary outdoor area.
126. These areas are located on the western side of our property and will look at a slightly oblique angle down what might be called a small view shaft to see the length of the two buildings in their entirety, with the remainder of our outdoor area (which is not designed to be a living area) and the southern face of the first floor of our home looking at the end (stepped to 3 stories, but with the third story visible) of Building 03.
127. We note here that the visual representation of the view from our rear is taken from the point furthest away from our living areas (ie the eastern side of our outdoor space, a space that is nicely landscaped but not suitable for outdoor living). This area is also the lowest side of the property. The net effect is to create a far from benign view with not insignificant dominance and overlook, but, nonetheless, one that is far less severe than the actuality.
128. We conclude that **the dominance and overlook effects are very high adverse from our living/outdoor areas.**
129. In addition, we consider the undoubted dominance and overlook from our second story, main bedroom windows (literally being dominated and overlooked by a sea of buildings breaching height and site coverage standards) to be a significant consideration.
130. The District Plan appears to say only that particular regard should be had to effects on amenity values associated with outdoor and indoor primary living areas. It does not say no regard should be given to other parts of a residence.
131. Given the (correct) analytical framework being applied here, and given the significance of principal bedroom space to amenity values, we conclude that **the**

**dominance and overlook effects are very high adverse from our second floor principal bedroom.**

132. The Residential Design Guide pays attention to living areas only (as far as we can tell); it is, however, a guide and is not binding. It is specifically designed to take into account specific circumstances.
133. In this case there is a specific circumstance to take into account the effect on upper story dominance and overlook. That is that, as a disabled person, the principal bedroom is my sanctuary in not infrequent times of significant depression and anxiety (I referred earlier to the extensive period of 2021 and 2022). The dominance itself and the overlook effects will significantly detract from the amenity value of the bedroom, and will likely increase the degree of my mental distress.
134. To not take into account this particular amenity value of the bedroom would be discriminatory against a disabled person.
135. This factor increases our assessment such that **the dominance and overlook effects are severe adverse from our second floor principal bedroom.**
136. Given the above considerations, even if one applied the Ryman's framework (wrong as that is), we consider the reasonable person would not conclude that **the dominance and overlook effects are high adverse from the first story and very high adverse from the second story.**

#### Privacy effects on 24 Scapa Terrace

137. We agree with the assessment of Ryman that **the privacy effects in regard to the first floor (at least) seem to be no more than minor**, given Ryman's modelling and mitigations (noting that the landscaping mitigations are inappropriate, as discussed in the Landscaping and Visual Effects section below; **more appropriate landscaping is required to achieve the no more than minor privacy effect**)
138. For the reasons given in the previous section on dominance and overlooking effects, the impacts on privacy in the principal bedroom on the second floor (where there is a clear view into the bedroom windows from the third floors of B02 and B03) need to be given particular weight. In this context **the effects on privacy on the upper story are assessed to be very high adverse.**
139. Even with the application of the Ryman's framework, **the effects on privacy on the upper story are assessed to be high adverse.**

#### Shading effects on 24 Scapa Terrace

140. The shading effect on our living and outdoor areas is egregious as is the methodology applied by Ryman (applying an additional screen where the residential standard is not met) in reaching the conclusion that the effect is minor.

141. According to the standard, 3 hours sunshine outdoor and 4 hours sunshine is considered to meet acceptable amenity values in mid-winter. Our property will receive 1.5 hours outdoors and indoors (a quarter hour early in the morning and one and a quarter hours mid-afternoon).
142. Because this does not meet the standard applied, Ryman' screen the effect on us further by limiting analysis to spring equinox and summer effects. And because the spring equinox and summer effect are deemed adequate (even though the equinox assessment refers to the 'rear garden,' rather than the outdoor or indoor living areas receiving sunlight between 8am and 4.15pm), and because shading effects would be greater with a building built to the Residential Building Standards (see the RDK submission for the demolition of the applicability of this latter filter), Ryman concludes that the shading effects are minor.
143. The Ryman assessment is clearly biased. It states that a factor it has included in its assessment is that our property currently enjoys a high level of sunlight. This may be true, but it is a completely irrelevant consideration. It does not matter what level of sunshine we enjoy currently; all that matters is whether the amount of sunshine/shading we will receive in the PV will be a minor adverse effect or more. We accept completely that under any development on the Site there may be a non-trivial reduction in sunlight and all that matters to us is that the effect is minor adverse.
144. Given: the savagely low amount of winter sunlight we would experience (and the countervailing high level of shading and its concomitant effect on the amenity values of our home, including the natural warmth within our home during the winter); the potentially significant adverse impacts at the equinox (noting the imprecise wording of Ryman's assessment); and the inappropriate methodology used by Ryman, **we consider the effects of shading on our property to be severe adverse.**
145. Even if Ryman's (incorrect) analytical framework is applied, we consider **the reasonable person would consider that the shading effects are high adverse.**

*Signage (section 5.10 of the AEE)*

146. We have no comment to make here.

*Landscaping and Visual Effects (section 5.11 of the AEE)*

147. We tautoko the submission of RDK in regard to the landscaping and visual effects on the neighbourhood and the adjoining properties. **The landscaping and visual effects are clearly at least adverse high and at least adverse moderate for the neighbourhood and the adjoining properties (under the correct and incorrect analytical frameworks respectively)**



148. We comment here in particular on the assessment that is made in relation to the landscaping and visual effects on our property, 24 Scapa Terrace.

#### **Landscaping effects on 24 Scapa Terrace**

149. We wish to emphasise the points made in the RDK submission about the lack of suitability of the Ryman landscaping proposal. The trees proposed will take too long to establish and will grow to too great a height, exacerbating shading effects and creating a new form of dominance.

150. When the s3(d) effect is taken into account as well, we conclude that **the effects of landscaping on our property will be very high adverse.**

151. With the application of the Ryman's analytical framework, the reasonable person would conclude **the effects of landscaping on our property will be high adverse.**

#### **Visual effects on 24 Scapa Terrace**

152. Ryman concludes that effects on adjoining properties range from high adverse to positive, with planting reducing effects over time to moderate adverse and then low or less than low adverse (with our property assessed as remaining low, or minor, adverse).

153. From the upper level Ryman notes that the visual change will be high but that a different typology could be 'anticipated' given the windfall nature of the Site and that the PV will reinforce the 'landmark' quality of the Site. There will be prominence and not dominance. The effect is assessed to be low/minor.

154. This assessment, particularly in regard to the upper level effects, relies very much on the application of the incorrect analytical framework, as has been consistently pointed out throughout our submission. If the proper analytical framework is applied, we conclude that **the visual effects on 24 Scapa Terrace are very high adverse** (particularly given the need to give specific consideration to the amenity value of the principal bedroom in this particular circumstance, as covered in the Urban Design section 5.9).

155. Even if the Ryman' (incorrect) analytical framework were applied we conclude that a reasonable person would conclude that **the visual effects on 24 Scapa Terrace are high adverse.**

#### *Wind (section 5.12 of the AEE)*

156. We have considered this section only briefly and so have no specific comment to make. However, we trust the judgement reached in the RDK submission and therefore consider **the effects of wind to be greater than adverse minor.**

*Noise (section 5.13 of the AEE)*

157. We tautoko the submission of RDK on this matter, particularly the effects of noise from tyres squealing immediately over our back fence (which was not even identified as a potential effect by Ryman). The highly questionable (by way of underestimate) assumption that 15 per cent of egress will be from the Campbell Street exit contained in section 5.14 (Traffic), underplays the magnitude of this effect, including that arising from its cumulative effect over time, still further (if the effect had been acknowledged in section 5.13).
158. On this basis our assessment is that **the effect of noise on our and other adjoining properties**, particularly those located at the western end of Scapa Terrace, **will be at least moderate and potentially high adverse**.

*Traffic (section 5.14 of the AEE)*

159. We tautoko the RDK submission.
160. For the reasons outlined in that submission the provision for visitor carparks are seriously deficient and will result in considerable on-street parking.
161. Similarly, the assumptions (and that seems to be all they are, assumptions founded on no data or modelling) that 90 percent of egress will head eastwards and that only 15 percent of egress will be via the Campbell site access point, seem to us to be serious miscalculations.
162. Key focal points for residents of the PV will be the Karori Shopping Centre where supermarkets are located and family members in mid- and south-Karori. These facts suggest a higher proportion of westward trips and Campbell street egress.
163. This introduces safety risks. While the traffic report by Ryman's suggests the Campbell Street – Karori Road intersection is safe, it is well known locally to be a risky intersection, particularly with the dog-leg via Karori Road into Raine Street and the supermarkets' parking area. This risk is exacerbated by a pedestrian crossing point close to the dog-leg.
164. It is submitted that given the elderly nature of the PV's residents **the effects of traffic, via health and safety, are moderate** (particularly given section 3(e) and (f) of the RMA).
165. An alternative scenario is that residents, aware of the safety risk, but keen to avoid the meandering exit from the eastern access point, take a dog-leg through Scapa Terrace to the Donald Street – Karori Road lights, creating adverse traffic effects for Scapa Terrace.

166. In addition, some residents whose parks are located along the southern boundary may prefer the Campbell Street egress, even if heading east (or to south-western or south-eastern parts of Karori), to meandering through the Site.
167. This reinforces the possibility of adverse effects on Scapa Terrace’s intimate character as a result of increased traffic flow (by utilising Scapa Terrace to get to the Donald Street lights or to south-eastern Karori).
168. The failure to identify let alone consider these potential traffic effects highlights the fallibility of experts and value of submissions (as discussed in the section earlier on unconscious bias) in assessing effects.
169. Taking all these factors into account, and applying s3(d) of the RMA, we assess **the traffic effects of the PV to be at least moderate adverse.**

*Open space and recreation (section 5.15)*

170. Our comments in regard to effects on public open spaces/recreational facilities (section 5.9.1.3) also apply here. Overall, our assessment is that **the effects on public open space and community facilities are moderate to high adverse.**

**Statutory Assessment: Application of the Section 104D test**

171. Having now completed our assessment of the effects of the PV on the surrounding environment and neighbouring properties, we turn to the statutory assessment of the application, in particular whether consent should be given to the application as a **non-complying** activity.
172. As Ryman rightly identifies the relevant test is section 104D of the RMA. It reads:

**104D Particular restrictions for non-complying activities**

(1) Despite any decision made for the purpose of notification in relation to adverse effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—

(a) the adverse effects of the activity on the environment (other than any effect to which [section 104\(3\)\(a\)\(ii\)](#) applies) will be minor; or

(b) the application is for an activity that will not be contrary to the objectives and policies of—

(i) the relevant plan, if there is a plan but no proposed plan in respect of the activity; or

(ii) the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or

(iii) both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity.

(2) To avoid doubt, [section 104\(2\)](#) applies to the determination of an application for a non-complying activity.

173. In considering any consent application, the decision maker is also required to have regard to section 104. Ryman, correctly, identifies the most relevant parts of this section to read as follows:

**104 Consideration of applications**

- (1) When considering an application for a resource consent and any submissions received, the consent authority must, subject to [Part 2](#) and [section 77M](#), have regard to—
- (a) any actual and potential effects on the environment of allowing the activity; and
  - (ab) any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity; and
  - (b) any relevant provisions of—
    - (i) a national environmental standard;
    - (ii) other regulations;
    - (iii) a national policy statement;
    - (iv) a New Zealand coastal policy statement;
    - (v) a regional policy statement or proposed regional policy statement;
    - (vi) a plan or proposed plan; and
  - (c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.
- (2) When forming an opinion for the purposes of subsection (1)(a), a consent authority may disregard an adverse effect of the activity on the environment if a national environmental standard or the plan permits an activity with that effect.
- (2A) When considering an application affected by [section 124](#) or [165ZH\(1\)\(c\)](#), the consent authority must have regard to the value of the investment of the existing consent holder.

*Application of the section 104D(1)(a) test*

174. In having regard to the section 104(1)(a) test our earlier assessment of the Ryman' AEE concluded that **any effects of the activity on the environment will be greater than minor by a significant degree.**
175. Our analysis of the issues to which Ryman has regard to under section 104D in its application (refer sections 7.3.3.1-3 and sections 7.3.4.1-2) do not materially change any of the conclusions we have reached in our analysis, particularly since the key relevant matters – the District Plan and the NPS-Urban Development – were factored into Ryman's (and consequently our) assessment of environmental effects.
176. We note in regard to the NPS-UD that where it has not been incorporated into a District Plan, it is not binding in the context of a resource consent application, but must only be had regard to it. Based on our assessment of the District Plan it already takes into account the great majority of the considerations raised by the NPS-UD. It would therefore be precipitate to attempt to predict how the NPS-UD might be incorporated in the District Plan, let alone attempt to apply any such prediction.

177. It is, however, telling that in its consideration of the NPS-UD (section 7.3.3.1), Ryman states, though none of its experts do so, that the (noting) principle in the NPS-UD (that a reduction in amenity values for some are not in themselves adverse effects where there are increases in amenity values to others), has been reflected in the Urban Design, and Landscaping and Visual Effects assessments. Given the previous paragraph this further undermines the validity of the assessments made by Ryman; discounting of potential reductions in amenity value has taken place because they are deemed not to be effects at all.
178. It would be outrageous to predict how the Council might incorporate a principle with such serious implications in the District Plan and any such incorporation should be the result of a thorough consultation process. How else can residents have the reasonable level of certainty that the Plan aims to create about what may happen within neighbourhoods?
179. Consequently, Ryman's assessments should be viewed with considerable scepticism and **effects that are deemed minor adverse by Ryman should be considered moderate adverse at least**, unless there is any compelling reason to do otherwise.
180. To the extent that any uncertainty exists about this specific point or the correct analytical framework to apply to this overall application, then section 7(c) of Part 2 of the RMA should apply, where there is a need to have regard to the maintenance and enhancement of amenity values (ie there can be no contemplation of an interpretation that reduces amenity significantly, unless that possibility of a reduction in amenity value is explicitly provided for in relevant documents).
181. Given the above and our wider analysis of the effects of the PV in this submission, we conclude that the application **cannot and should not be approved as a non-complying activity under section 104D(1)(a)**.

*Application of the section 104D(1)(b) test*

182. This test is an unusual one. It is difficult to conceptualise how a proposed development could be approved under this test. If the development has minor or less than minor adverse effects it could be approved under the (1)(a) test, and if it has more than minor adverse effects it could not be approved under the (1a) test.
183. This test, therefore, only has a hope of succeeding if it has more than minor effects, but is somehow not contrary to the District Plan. Thus, this test sets an even higher bar than the (1)(a) test.
184. Perhaps in recognition of this Ryman' analysis of whether its application meets this test is cursory (section 7.3.3.3 is three pages long compared to the considerable length of the AEE which focuses on the (1)(a) test).

185. To reinforce this impression, the analysis by Ryman, is not structured as a proper analysis of whether this test is met should be. A proper analysis would first consider the context for the District Plan (chapter 1) and the context for the residential objectives and policies under the plan (the preamble to chapter 4). It would then go through each objective and the policies for achieving each objective to assess whether the application is not contrary to the Plan (taking into account the context for the Plan and for the residential objectives and policies).
186. Instead, Ryman puts together (the aforementioned three pages of) bullet points on a variety of issues with references to various objectives and policies by way of footnote. In no way is the reader able to reach a conclusion about whether this is a fair assessment of whether the (1)(b) assessment has been met or not. Consequently, **the Ryman' assessment that the (1)(b) test has been met cannot be accepted by definition.**
187. We have not had the time to carry out a proper analysis of the application against each objective and its supporting policies in the time available for submissions.
188. All we can say here is that from our reading of the District Plan's objectives and policies (interpreted in the context of the Plan itself and taking into account the Residential Design Guide), Ryman appear to have cherry-picked elements of the objectives and policies of the Plan that its development may (arguably) not be contrary to and ignored those which it is (arguably) contrary to.
189. It seems to us that the District Plan as a whole, as represented in its objectives and policies, primarily attempts to get the balance right between two competing objectives, its desire for intensification and its desire to maintain and even enhance the amenity value of neighbourhoods and residences. It is not always explicit about where the balance should be struck, but, on the whole, seems to be cautious about impacting adversely on the amenity values existing neighbourhoods and residences.
190. It has been bold in establishing Medium Density Residential Areas, but is cautious elsewhere, including in its provisions for multi-unit developments.
191. Given Ryman' emphasis on the windfall nature of the site, it is important to re-emphasise that this caution applies to its objectives and policies in regards to such sites. As discussed earlier in this submission (in the section on establishing the correct analytical framework), the Council has specifically recognised in establishing windfall sites that it is doing so to maintain character and amenity in the Outer Residential Zone (of which we are a part) and acknowledged this makes windfall sites only 'generally' suitable for intense development.
192. Each case needs to be assessed on its merits. To assess merits the Council has explicitly turned its mind to what its policies imply by establishing rules to give effect to them, including setting limits to its discretion on critical matters such as site coverage and building height.

193. It is reasonable to conclude that if the Council considered there might be situations in regards to windfall sites where non-compliant activities could be approved, it would have forewarned residents by way of alerting residents in its District Plan to the possibility that there could be proposals which breach its standards (including those where it has limited its discretion) that were still consistent with (or not contrary to) its District Plan. That it did not do so in the case of windfall sites speaks volumes; the Council did not contemplate such an occurrence. Consequently, nor did residents.
194. Given this context it is very difficult to contemplate that a development that has more than minor effects on the neighbourhood and residences of the relevant environment is not contrary to the District Plan, let alone a development which, as we assess it, has a number of moderate to very high adverse effects.
195. Accordingly, **we conclude that the application cannot be approved under section 104D(1)(b) of the RMA.**

### **Conclusion**

196. Overall, the PV clearly fails to meet either test for approval of a non-complying activity. There are a wide variety of moderate and high adverse effects and the PV is clearly contrary to the District Plan.
197. Consequently, **the application should be denied** and Ryman encouraged to develop a more modest proposal which complies with the District Plan or meets the statutory tests for a non-complying activity.