

To: Hearing Panel

## **JCA Executive Summary Overview for Stream 2**

### **Introduction**

The following is the Submission of the Johnsonville Community Association (JCA) to the Hearing Panel on the Proposed District Plan (PDP).

### **Introduction**

The pressure for increasing housing density in Wellington is driven by projected population growth estimates completed by Wellington City Council (WCC) some years ago. Projected population growth estimates are not supported by recent data e.g. in the last two years, the actual population growth has been falling. However, there has been no adjustment made to the projected population growth estimates to reflect this. Therefore, the PDP now appears to be visiting unnecessarily large adverse impacts on the city based on a now unwarranted significant increase in housing density despite this decrease in actual population growth.

Johnsonville has had its central residential area zoned as a Medium Density Residential Area (MDRA) since 2013. This zoning was intended to increase medium density infill housing in the MDRA. Since that time a number of non-compliant and substandard multi-unit developments have been built in the Johnsonville MDRA area.

The WCC arranged for an independent review of the MDRAs. That review, which was completed by Urban Perspectives Ltd in February 2020, was titled *Outer Residential Area Infill Development – A Review of the Effectiveness of the Current District Plan Provisions*. The JCA was not interviewed for this review.

The primary focus of the review was on why the quantity of the infill housing was not successful with the review stating on page 21 that *“Plan Change 56 has likely had a negative impact on the delivery of infill housing in the city in terms of quantity”*. It would appear that the review did not focus on the quality of the infill housing, a considerable concern for JCA.

From the JCA's perspective, we consider it to be ironic that a failed medium density zone in Johnsonville is now deemed to be the right place to implement a high-density housing zone.

### **The PDP Rules are Just the Minimum Starting Point for Developers**

Also of interest, from that review, was the number of breaches against height planning rules. In section 5 on page 9 of that report it states the following:

*“For context, the Council processed 5,439 resource consents during this timeframe (from January 2009 to December 2018). Of that total, 610 resource consents were for maximum height breaches, including those for infill housing units. Infill housing unit height breaches made up 17.4% of all maximum height breaches, or 106 instances. This was 1.95% of all resource consent processed. It is understood that all of these consents were granted.”*

That most multi-unit developments exceed the permitted planning rules are a major concern to the JCA. We note that developments that go beyond the rules are mostly permitted without notification. The reasonable expectations of residents who assume the rules will protect their interests are therefore not met.

JCA also supports the proposals made by Kirsty Wood and the Newlands Residents Association in relation to preservation of sunlight / prevention of excessive shading for properties neighbouring both high and medium density development.

The residential planning rules in the Proposed District Plan (PDP) are more permissive than current rules, especially in HDRZ areas where developments will now be permitted to 6 storeys or perhaps even higher. It is the role of WCC Planners (and Consent Team) to apply these rules and, in doing so, protect the interests of neighbours from significant intrusions and loss of amenity.

Johnsonville has experience with WCC Planning officers applying MDRA rules on residential developments in Central Johnsonville. When the MDRA was imposed on Johnsonville under District Plan Change 72 there were concerns that the interest of neighbouring home owners would not be protected or

even consulted if the development breached the MDRA standards. In response the WCC stated in 2008:

*Under the proposed rules if a development proposal meets the standards outlined in the District Plan then the resource consent will only consider impact on street character and neighbours approval will not be required. However if the proposal does not meet a standard relating to site coverage, height or building recession planes then neighbours may be consulted depending on the effects created by the breach.*  
Areas of Change Questions and Answers 2008

However, since 2013 about half the multi-level developments in Johnsonville have been built in breach of these MDRA planning rules, but WCC Planning Officers have still permitted every one of these developments on a non-notified basis claiming “*effects are less than minor*”. The promise made when the MDRA was created that neighbouring home owners would be consulted on residential developments that do not comply with PDP planning rules has been consistently broken by WCC Planning Officers.

This has been a breach of those WCC Planning Officers fiduciary duty – their duty of care – to genuinely consider and genuinely act to protect the best interests of home owners where residential developments do not comply with Council planning rules.

The Council has now set expectations with developers that they will regularly issue non-notified permits for developments that are planned to exceed the limits for PDP rules. The proposed changes to enable more intense and, especially, higher residential developments greatly increases the likelihood of additional loss of amenity of neighbouring properties. That developers can also expect to be permitted to routinely exceed these rules means current residents cannot have any faith in the WCC Planning Officers to protect their interest even when non-compliant developments are proposed.

The PDP has retained these provisions from the Draft District Plan and so the JCA objection to them remains.

This also means that future buyers of homes cannot be certain about how the amenity of their homes may be degraded further by new permits in the future that are in breach of the planning rules. This is not a desirable outcome for the housing market in Wellington.

Going forward, if this situation persists with the planning rules being routinely exceeded in medium, and particularly, high density housing zones, then the additional adverse effects on the amenity of neighbouring properties will be considerable. These neighbouring properties will incur severe injurious affection for which there will be no remedy. No remedy means no justice, no fairness and no equity when these outcomes occur.

**For the above reasons, the JCA strongly recommends to the Commission that it recognises that most of these planning rules represent the permitted starting point for developers and these can be exceeded by way of non-notified resource consent.**

The JCA also notes that best practice organisations have strong legislative compliance programmes to ensure that their organisation is fully compliant with legislation requirements. This involves annual sign offs by all senior managers and their delegates that they have complied with legislation rules. Any intention to breach planning rules should be viewed as a breach of the WCC's compliance with legislative requirements. Breaches must be reported immediately to the Council's Chief Executive who must report these breaches promptly to the Mayor and Councillors. Corrective action by the WCC should then follow to address each breach.

**To get this problem under control, the JCA has the following recommendations:**

- A. The height rules are the maximum end point and NOT the minimum starting point for the building heights for all new buildings and high density housing, and**
- B. Any proposal that breaches the building height rules must be publicly notified and subject to consultation with the public and, particularly, affected neighbouring homeowners before any resource / building consent is issued, and**
- C. Consider whether the principles, set out in the latter two recommendations, should also be applied to other planning rules which would likely be breached in a high density implementation planning environment.**



The JCA made the following recommendation to address this problem in its submission to the WCC in September 2022:

*4. The JCA requests that the WCC more clearly outline the criteria under which Planning Officers will permit non-compliant housing developments on a non-notified basis.*

The JCA now considers that this recommendation is not sufficiently strong to deal with this significant issue of non-notified consents routinely exceeding planning rules and that our request will not solve this problem. Therefore, we now consider that recommendations A, B and C above must be implemented to address this problem.

### **Correction to the Council Officer’s High-Density Residential Zone Section 42A Report**

The correction relates to paragraph 124 and the information contained in the box on page 19. The reason for requesting this correction is that the original reference to “*railway stations*” was intended to apply to Kenepuru and Tawa stations only. The reference to “*railway stations*” remained when these named stations were removed. However railway stations do not have any special significance under the PDP but, as per the NPS-UD, “*rapid transit stops*” are significant. Therefore the reference should be to “*rapid transit stops*”. **The JCA recommends that in the first sentence in the box the reference to “*railway stations*” should be deleted and changed to “*rapid transit stops*”.**

### **Evidence from Johnsonville is that the MDRA has not delivered quality housing: Why?**

Johnsonville has had its central residential area zoned as a Medium Density Residential Area (MDRA) since 2013. Since then a number of non-compliant and substandard multi-unit developments have been built in the Johnsonville MDRA area.

In the JCA’s submission on the DDP we indicated that it was notable that the WCC has failed to review the current Johnsonville MDRA to confirm if it is meeting the objectives claimed in District Plan Change 72 (DPC72).

Accordingly, the JCA included the following recommendation in its submission:

*5. The JCA requests the WCC complete an independent review of the current Medium Density Residential Areas (MDRAs) to determine if*

*the objectives in DPC72 have been met and confirm the WCC has successfully permitted “Density Done Well” developments. This review should provide a clear list of Do’s and Don’ts for future housing development within the city.*

Further checking by the JCA has revealed that the WCC had already arranged for an independent review of the MDRAs. The JCA was not interviewed for this review.

That review, which was completed by Urban Perspectives Ltd in February 2020, was titled *Outer Residential Area Infill Development – A Review of the Effectiveness of the Current District Plan Provisions*.

The primary focus of the review was on why the quantity of the infill housing was not successful, with the review stating on page 21 that *“Plan Change 56 has likely had a negative impact on the delivery of infill housing in the city in terms of quantity”*. It would appear that the review did not focus on the quality of the infill housing. However, based on our experience JCA considers that there are also considerable issues around the quality of infill housing that has been built.

Also of interest, from that review, was the number of breaches against height planning rules. In section 5 on page 9 of that report it states the following:

*“For context, the Council processed 5,439 resource consents during this timeframe (from January 2009 to December 2018). Of that total, 610 resource consents were for maximum height breaches, including those for infill housing units. Infill housing unit height breaches made up 17.4% of all maximum height breaches, or 106 instances. This was 1.95% of all resource consent processed. It is understood that all of these consents were granted.”*

For JCA this confirms that the MDRA it has had for 8 years from 2013 has led to development which was often of poor quality. From the JCA’s perspective, we consider it to be ironic that a failed MDRA in Johnsonville is now deemed to be the right place to implement a high-density housing zone. Can a high density residential zone really do better than what has happened in our Medium Density zone, despite there being a Design Guide in place?

## **JCA Supports Legislation Permitting 3 Dwellings up to 3 Storeys in all Residential Areas**

The JCA supports the Resource Management (Enabling Housing and Other Matters) Amendment Act's intention of permitting 3 dwellings up to 3 storeys within 50% of a property's space in all residential areas.

Accordingly, the JCA included the following recommendation in its submission:

- 2. The JCA supports the proposed change to permit 3 dwellings up to 3 storeys in all residential areas.**

## **JCA Does Not Support Fundamental Changes "Up to 6 storeys" to "At Least 6 Storeys" in the High-Density Residential Zone**

WCC Section 42A outlines in paragraph 18 that the wording of the key height statement "*up to 6 storeys*" for PDP High Density Residential Zone should become "*at least 6 storeys*".

It must first be noted that the words "*at least 6 storeys*" have a fundamentally different meaning to "*up to 6 storeys*". There is no information on the impact of changing the High Density Residential Zone to permitting "*at least 6 storeys*" actually means in the PDP.

Secondly, the JCA highlights the linkage of this change to the "City Outcomes" section of the Residential Design Guides to be reviewed in Stream 4.

JCA rejects the assessment outlined in paragraph 18 because this is a potentially massive change to the core height rule but this definition has never been canvassed at any phase of the public consultation on the Spatial Plan, Draft District Plan or the Proposed District Plan. The JCA strongly opposes the consequential changes including recommendations in paragraphs 113, 138 and 185.

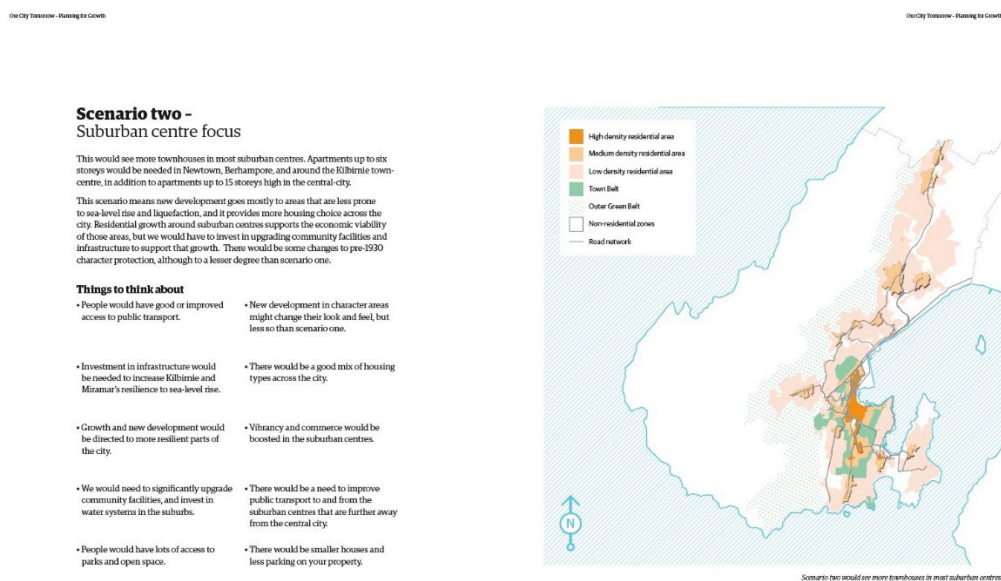
This is not the first time in this consultation process, that the WCC has proposed a lesser height limit as part of the public consultation and then changed the limit after the consultation has finished.

The 2019 Spatial Plan public consultation proposed high density housing only in the CBD. For the suburban areas currently zoned as "High Density", the

WCC original consulted on having “Medium Density 2” being a “Mix of terraces houses and low-rise Apartments (up to 4 floors)”.

For example, the public consultation document for “Scenario 2 - Suburban Centre Focus” stated 6 storeys would only be permitted in a few selected inner suburbs:

*This would see more townhouses in most suburban centres. Apartments up to six storeys would be needed in Newtown, Berhampore, and around the Kilbirnie town centre, in addition to apartments up to 15 storeys high in the central-city.*



Source: “What’s your view?” WCC Engagement Report for “Planning for Growth” April 2019

So when the WCC states that the 2019 Spatial Plan had 1,372 submitters and that “66% of people said they agreed, or strongly agreed, that scenario two, with its focus on suburban development supported by inner-city growth, does the best job of balancing the trade-offs.”, this was on the basis that suburban centres would have a height limit of 4 storeys, not 6 storeys.

However, the final “Draft Spatial Plan for Wellington City” was released after the NPS-UD was announced by the government. The WCC changed the Spatial Plan to reflect the minimum requirements of the NPS-UD stating, for example:

*In line with the NPS-UD 2020:*

- *Enable at least 6 storey buildings within a 10-minute walking distance of Johnsonville and Tawa railway stations and the Johnsonville centre (see maps on following pages).*
- *Enable at least 6 storey buildings within a 5-minute walking distance of all other railway stations (i.e. Raroa, Khandallah, Simla Crescent, Box Hill, Ngaio, Awarua, Crofton Downs, Linden, Redwood, Takapu Road)*

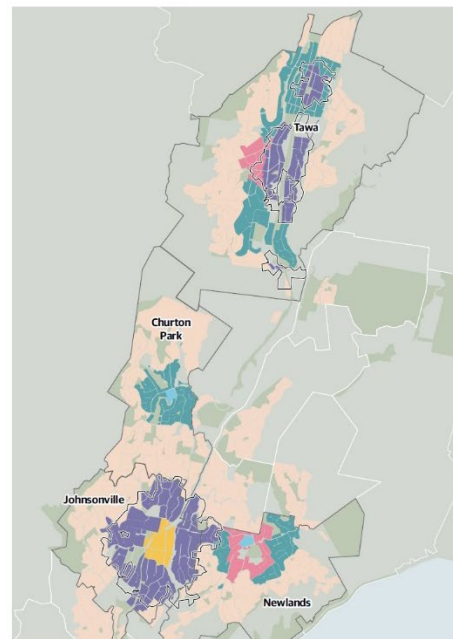
### Northern suburbs

#### Provide for greater housing choice and opportunities for more vibrant suburban centres by:

- Medium density housing located around the 15 suburban centres and around key transit routes.
- Opportunities for mixed use development in the 15 suburban centres
- In the Johnsonville and Kilbirnie centres, buildings up to 8 storeys are proposed.
- In line with the NPS-UD 2020:
  - Enable at least 6 storey buildings within a 10-minute walking distance of Johnsonville and Tawa railway stations and the Johnsonville centre (see maps on following pages).
  - Enable at least 6 storey buildings within a 5-minute walking distance of all other railway stations (i.e. Raroa, Khandallah, Simla Crescent, Box Hill, Ngaio, Awarua, Crofton Downs, Linden, Redwood, Takapu Road)
  - Removing the requirement to provide on site car parking for new developments to allow more efficient use of the site and support the City's Carbon Zero goals.
  - New development to be supported by measures to ensure density is done well and that good environment outcomes are achieved.

#### Housing density types

- Type 1**  
1-2 storeys detached, semi-detached/infill housing
- Type 2**  
2-3 storeys terrace type housing
- Type 3**  
3-4 storey apartment buildings, may be mixed use
- Type 4a**  
Up to 6 storeys, mixed use and apartment buildings
- Type 4b**  
At least 6 storeys, mixed use and apartment buildings (NPS-UD requirement)
- Type 5**  
Up to 8 storeys, mixed use and apartment buildings
- Open space
- Suburb boundaries
- Areas impacted by NPS-UD 2020



But, even though the UPS-UD states the “**at least 6 Storey Buildings**” is to be permitted, it is clear that the WCC settled on 6 storeys (or 21 metres) as the maximum permitted height for High Density Residential Zones for the District Plan that was consulted on with the public.

This WCC definition is encapsulated in the phrase “up to 6 storeys” and this maximum height limit was the basis of the public consultation on the Draft District Plan. For example as part of the Draft District Plan consultation the WCC stated in the section on Building Heights:

**Question:** *What are the height limits outside of Character Precincts?*

**Response:** *Within a 15 minute walking catchment of the edge of the City Centre Zone, **the maximum building height is 6 storeys** outside of the Character Precincts. Resource consent can be applied for to exceed this height limit. This meets the NPS-UD requirement to enable at least 6 storeys within the walkable catchment and is in line with the final Spatial Plan and Councillor’s decision to apply the 15 minute walking catchment through that process.*

*Areas outside of the 15-minute catchment (e.g. Berhampore) have height limits between 11m-21m.*

**Question:** *Could submitters seek a lower height limit within the 15 minute walking catchment, outside of the Character Precincts?*

**Response:** *Submitters can include this request in their submissions. However, the NPS-UD requires the District Plan to enable development of at least 6 storeys within a walkable catchment of the City Centre Zone. **A 15 minute walkable catchment has been applied in the Draft District Plan in line with the Spatial Plan, and a maximum height limit of 6 storeys applies.** To depart from this requirement of the NPS-UD, a qualifying matter must apply. This requires a strong evidential base that justifies why lower heights are appropriate. Submitters will need to show this in their submissions.*

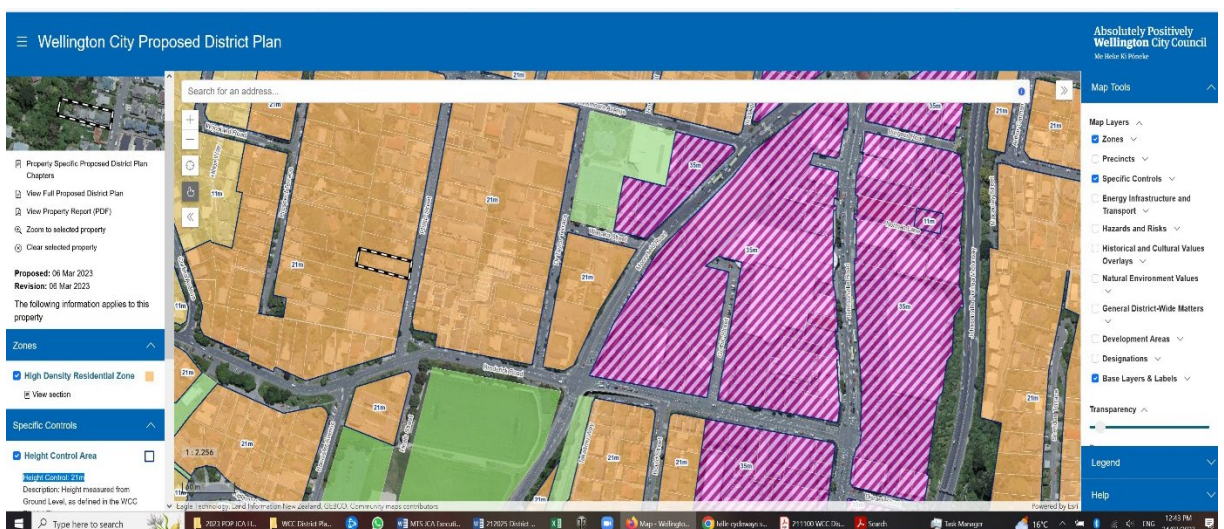
Source: Draft District Plan – Councillor Questions and Officer Responses (Last updated: 19th October 2021)



The Draft District Plan itself states the maximum height for a High Density Zone (then confusingly called “Control Area 3”) is clearly stated to be 21 m which is 6 storeys:

Effects Standards for buildings or structures associated with multi-unit housing or a retirement village	
<b>MRZ-S8</b>	<b>Maximum height</b>
1. Buildings and structures must not exceed the following maximum heights above ground level:	
<b>Location</b>	<b>Limit</b>
a. Height Control Area 1	11m
b. Height Control Area 2	14m
<b>c. Height Control Area 3</b>	<b>21m</b>
<p>This standard does not apply to:</p> <ul style="list-style-type: none"> <li>a. Accessory buildings.</li> <li>b. Fences or standalone walls.</li> <li>c. Solar panel and heating components attached to a building provided these do not exceed the height by more than 500mm.</li> <li>d. Satellite dishes, antennas, aerials, chimneys, flues, architectural or decorative features (e.g. finials, spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 1m.</li> </ul>	
Assessment Criteria where the standard is infringed:	
<ul style="list-style-type: none"> <li>1. Streetscape and visual amenity effects;</li> <li>2. Dominance, privacy and shading effects on adjoining sites; and</li> <li>3. Wind effects for buildings exceeding 21m.</li> </ul>	
<b>MRZ-S9</b>	<b>Height in relation to boundary</b>

The same statement of the High Density Residential Height Limit being “up to 6 storeys” (or the equivalent of 21m) was the basis of the public consultation on the Draft District Plan. Examples of this are in the PDP map and the documentation:



### **High Density Residential Zone (HRZ)**

*The HRZ encompasses areas of the city located near to the City Centre Zone, Johnsonville Metropolitan Centre Zone, and Kenepuru and Tawa railway stations. The zone provides for a range of housing types at a greater density and scale than the Medium Density Residential Zone.*

*It gives effect to the requirements of the RMA to allow for three residential units of up to three storeys on a site, and also by enabling multi-unit housing of up to six storeys through a resource consent process.*

Source: Section 32 Evaluation Report Part 2: High Density and Medium Density Residential Zones

Following all the above public consultation, the WCC Section 42A report now states:

#### **Assessment**

18. In a general sense, the HRZ appropriately incorporates the NPS-UD and MDRS as required by the RMA by enabling building heights of at least 6-storeys and incorporating the MDRS and targeted standards provided for proposals of more than four residential units. I am of the opinion that the objectives, policy, rules and standards provides for 'at least' 6-Storey buildings. Specifically, the 21m height limit for four or more residential units is not an inflexible maximum height, with height infringements and associated effects able to be considered as part of the consenting process. I also note that in subsequent sections of this report, I recommend amendments that provide additional height exclusions to encourage and enable variations in roof / building design whilst still enabling at least 6-storeys to be achieved, and also a greater permitted height of 14m for 1-3 residential unit developments in the HRZ.

The above opinion of one planner is total contrast with all statements made about this height limit to date. If the WCC wished to have the height limit stated as being “‘at least’ 6-Storey buildings”, they have had every opportunity over the past four years to propose this to the public ... but they have not done so. They have consistently proposed “up to 6 storeys” as their definition and, on this basis, the officer recommendation should be rejected.



The JCA recommends that the Council officer's recommendations to change the High Density Definition of Height be rejected and the current statement of "up to 6 storeys" be retained throughout the PDP. If the WCC wishes to have a more permissive definition, it is only right and proper to have this change made through a public District Plan Change rather than through the back door of the Hearings Process.

### **JCA Supports the Best Practice of Infrastructure Shortfalls Being Upgraded Before High Density Housing is Implemented**

**Johnsonville Rail Line** – Not currently rapid mass transit service but could be upgraded at some point in the future.

JCA's view is that the Johnsonville Rail Line needs to be to **actually upgraded**, so that is it in fact a rapid mass transit service, **BEFORE high density housing is implemented in Johnsonville and along the rail corridor.**

**Permeability** - Council Officers have recommended that this be moved to Stream 5

However, JCA is of the view that this is a pertinent matter when considering height limits as the suitability of an area is development is strongly correlated to permeability as demonstrated by the recent flooding, particularly in recently developed Auckland suburbs, and the likelihood of heavy rainfall becoming the norm in future.

**Stormwater** - This also ties into provision of infrastructure such as stormwater. Again the recent storms and associated flooding have shown the absolute need to install adequate e.g. stormwater drainage BEFORE developments occur to avoid the personal tragedies and national disruptions we are now experiencing.

**Green spaces** – The value of urban green space (and also trees) – both public as in parks and also private green space – is being increasingly recognised as an essential part of all new and existing housing developments. Green spaces are often treated as “nice to have” whereas they are in fact a vital part of an ecosystem and a key component in making cities liveable as the climate changes e.g. by reducing heating effects. The increasing use of infill housing and more intense developments is putting increasing pressure on the amount of green space in our cities.

**JCA recommends that the proposed changes to Point 4 in Recommendation 237 in the High Density Residential Zone does not proceed and the original wording requiring the provision of adequate infrastructure before development is restored.**

This is recommended to ensure that all developments are of an adequate standard when they are built to avoid the increasing issues that are occurring throughout New Zealand as a result of inadequate infrastructure and lack of attention to issues such as permeability.

**JCA also recommends that the District Plan makes an explicit provision for the retention of green spaces both as a requirement within any individual development, at least in the Medium Density Residential Zone, and for the provision of publicly owned parks where private urban green space is small.**

#### **Recommendations from JCA’s Submission of September 2022 on the PDP were:**

22. The JCA requests the WCC fund and complete the planned Moorefield Road roading improvements for the Johnsonville Triangle to support planned population growth.
23. The JCA supports the Green Space Review for Johnsonville and requests it be completed as soon as possible.
24. The JCA requests that development of the Old Library Site be postponed until the Green Space Review is complete.
25. The JCA requests the WCC outline the specific planned investments in each of the above areas that require further investment in facilities and infrastructure.

## **JCA Does Not Support the City Outcomes Contribution and Requests its Removal from the PDP and the Design Guide**

The JCA understands that Council Officers have recommended that the City Outcomes Contribution be moved to Stream 4.

The JCA has considerable concerns with this issue which it has outlined in its submission to the WCC in September 2022. We understand that this issue will be of particular significance to Johnsonville in relation to its:

- metropolitan centre, and
- high density residential zone around the metropolitan centre.

These concerns have simply been amplified by the Council officer's recommendation supporting high density housing of *"of a least 6 storeys in height"* as outlined earlier in this submission to the Commission.

Accordingly, the JCA included the following recommendation in its submission in September 2022:

6. The JCA opposes the inclusion of the "City Outcomes Contributions" and requests these provisions are removed from the PDP and the Design Guides.

The JCA will comment further, in some depth on this issue, in Stream 4.

## **JCA Strongly Recommends Setbacks in the Current District Plan be Reinstated in the PDP**

One major recent decision by the Council has been to remove the building front and side setback requirements in the current District Plan. Permitting buildings onto the boundary is a significant loss of neighbourhood amenity and is likely to further reduce the natural light next to high buildings.

Accordingly, the JCA included the following recommendation in its submission in September 2022:

26. The JCA opposes the WCC recent decision to remove building front and side setbacks in the current District Plan and request they be returned to the PDP.

We note that the Council officer has recommended in his Section 42A Reports that the side and back setbacks be reinstated but not the front setbacks. The JCA agrees with the Council officer recommendation to reinstate the side and back setbacks but disagrees with the Council officer recommendation to not reinstate the front setback. The Council officer's recommendation is based on

the rationale set out in paragraph 537 of the High-Density Residential Zone Section 42A Report as follows:

*“However, I do not support a front yard building setback for one to three residential unit developments in the HRZ. I consider that a front yard is not necessary for developments of 1-3 residential units in a high-density residential accommodation as this allows for more efficient use of land.”*

It does seem ironic that in order for the residents of a 1-3 residential unit in a high-density residential accommodation to have a front yard those residents will have to rely on either:

- a 1 metre side yard of a neighbouring property, or
- better still, a 1.5 metre back yard of a neighbouring property

in order to have a front yard. Whilst this may meet the Compact design principle in the Design Guide, it doesn't even attempt to meet the Greener design principle.

Lack of front yards – even modest ones of a metre – on multi-storey buildings results in an imposing structure right next to pathways used by the public. This reduces the look and feel of a neighbourhood and makes it less inviting to pedestrians at a time when we need to encourage more active transport modes.

This may also mean that doors and windows open directly out and across footpaths along with any items a resident may place there, e.g. pot plants, resulting in obstacles that need to be navigated by footpath users.

Accordingly, the JCA recommends that the front yard setbacks of 1.5 metre be reinstated for residents of a 1-3 residential unit in a high-density residential accommodation.

### **JCA Strongly Recommends Maximising Sunlight for Neighbouring Properties to Prevent Loss of Amenity and Value**

In the JCA's submission to the WCC in September 2022 for neighbouring residents we made a number of comments about the importance of maximising sunlight for neighbouring properties affected by high density housing and building developments.

The JCA is concerned that a significant loss to neighbouring home owners will occur when developers build their 6 storey (or higher) high-density accommodation buildings next to residential homes that are either 1 or 2 storeys high.

That significant loss is due to the significant loss of amenities (i.e. particularly sunlight, light, as well as privacy, views, tranquillity) and financial value from residential home owners' properties. In legal terms, neighbouring home owners incur injurious affection if there is a loss of amenity value from their properties.

### **Effect on Property Value of Losing Sunlight Hours**

The New Zealand Motu study identified the effect on a property's value for each hour of sunlight a property loses. The Motu study was carried out on Wellington properties during 2008 to 2014. It found that for each hour of sunlight loss, a property's value decreased by 2.4%.

This means that for a \$1,000,000 home a 1 hour loss of sunlight would mean that the value of the home would fall by \$24,000 to \$976,000. It is clear that when high density housing is implemented in Wellington the loss of sunlight on neighbouring properties is likely to be much greater than 1 hour. So, if a property loses, say, 5 hours of sunlight per day then the value of a \$1,000,000 home would fall to \$880,000.

The JCA notes the lack of other supporting data in the Proposed District Plan about the loss of sunlight. The JCA is concerned that the amount from the Motu Study may be an under-estimation of the actual loss of value. The JCA requests that the WCC undertake independent monitoring of what happens to market prices in the Wellington property market to:

- properties that surround high density developments of over 3 storeys, versus
- those properties aren't close to these developments.

The market price differential between the zones should provide a clear guide of the value placed on loss of amenities such as sunlight for a property. The JCA notes that rateable values are not relevant to this calculation as they are set by Quotable Value and that QV is also the Council's valuer, for rating purposes, so there is a potential for conflict of interest to arise here.

### **Effect on Government's Requirements for ALL Homes to be Warm & Dry**

The JCA is also concerned that permitted developments above 3 storeys in suburban areas will render neighbouring homes less warm and dry. The reduction in warmth and dryness, which are government goals for ALL housing raises the question as to whether the government and council has fulfilled its fiduciary duty, its duty of care obligation, to affected residential home owners significantly and adversely impacted by these new building height zoning requirements. Obviously, the amount of sunlight on homes has a significant contributory effect in helping to keep homes warm and dry.

### **Proposed Planning Rules for Sunlight**

The effect of the rules for sunlight in the PDP represent a major change from the current District Plan. The JCA considers the new PDP rules to be excessive because the loss of sunlight from neighbouring properties results in a major transfer of value from existing residents to developers.

As an appropriate compromise, the JCA supports:

- a) Kirsty Wood's proposal set out in the box in paragraph 706 on page 101 of the Medium Density Residential Zone Section 42A Report, and
- b) The Newtown Resident's Association proposal set out in the box in paragraph 707 on page 101 of the Medium Density Residential Zone Section 42A Report.

If these proposals are not adopted, the outcome will be to take sunlight away from properties that neighbour high-density housing and new buildings in the outer suburbs.

Neighbouring properties losing amenities and value because of nearby 6 or more storey high density housing located in the outer suburbs is essentially an economic wealth transfer from those residents to the developer without compensation. This is a win lose outcome for the developer versus neighbouring residents.

This unfair outcome should require the developer to compensate affected neighbouring residents from high density accommodation housing who incur injurious affection.

Therefore, JCA recommends that the loss of amenity value, and in particular sunlight, could and should be mitigated by putting in place a compensation framework for neighbouring residents in outer suburbs who suffer a loss of amenity and value due to nearby high-density housing and new building developments. This then would create a win-win outcome for the developer and neighbouring residents in the outer suburbs.

Any compensation framework should include the following:

- a) An agreed framework that calculates a fair and equitable compensation amount for outer suburb residential property home owners who incur injurious affection from 6 storey or more high-density housing accommodation developments.
- b) The Council should collect the compensation amounts from developers as it is better placed to carry out this function than individuals. Otherwise, residential home owners may have a battle on their hands trying to collect it from developers. Since Developers have to maintain good relations with Council, this should encourage and help to ensure compliance with compensation payment requirements from developers.
- c) Councils should set firm deadlines and ensure strong monitoring of compensation payments and strong follow-up of any outstanding compensation payments.
- d) Council should place the compensation payments from developers into a separate trust account for each housing development. The council should have firm deadlines for paying compensation amounts from each housing development's trust account to affected residential home owners.
- e) Prior to the Council providing approval to a developer for each high-density housing accommodation development, the Council should require the developer to personally guarantee in writing the payment of compensation to affected home owners and provide the information confirming the assets that are in place to underwrite that guarantee. This requirement is to avoid a developer just closing up his development shell company and saying that there are no funds to pay compensation to affected residential home owners.

This compensation framework would help to promote developments and would result in fairer and equitable outcomes for ALL parties affected by high density housing and other building development initiatives.

4. In the economic sphere, can Mr Osborne please comment on the following issues:

(a) What are the implications of the drop in property values commencing March/April 2022 for the cost benefit evaluation around further intensification, and for the predicted surplus of realisable enabled supply to meet demand over the short, medium and long term time horizons In relation to the former, is there potential (as suggested by Mr Spargo) for the enablement for intensification in the PDP to cause property values to drop further than would otherwise be the case, and for consequential adverse social and economic effects that have not to date been considered?

Accordingly, the JCA included the following recommendation in its submission in September 2022:

23. The JCA recommends the PDP include a compensation framework for neighbouring residents who suffer a loss of value and amenity due to nearby high-density accommodation housing developments.

The JCA recommends that the proposals by Kirsty Wood and the Newtown Residents Association contained in paragraphs 706 and 707 of the Medium Density Residential Zone document be adopted.

## **Conclusion**

The decisions about this PDP are the biggest change to the city of Wellington in at least the last 50 to 60 years if not longer than that. Decisions about the PDP will affect the northern part of Wellington for the next 50 to 100 years. It is therefore fundamental that those decisions are sound and right. Prescient wisdom is the pre-eminent requirement to achieve this.

## **Recommendations**

We have listed each of our recommendations for clarity sake for the Commissioners to consider.

## **Planning Rules**

The JCA strongly recommends to the Commission that it recognises that most of these planning rules represent the permitted starting point for developers and these can be exceeded by way of non-notified resource consent.

To address the issue of planning rules being just a starting point JCA makes the following recommendations:



- A. The height rules are the maximum end point and NOT the minimum starting point for the building heights for all new buildings and high density housing, and
- B. Any proposal that breaches the building height rules must be publicly notified and subject to consultation with the public and, particularly, affected neighbouring homeowners before any resource / building consent is issued, and
- C. Consider whether the principles, set out in the latter two recommendations, should also be applied to other planning rules would likely be breached in a high density implementation planning environment.

### **Corrections to High Density Residential Zone Report**

The JCA recommends that in the first sentence in the box which is part of paragraph 124 in the High Density Residential Zone report, the reference to “*railway stations*” should be deleted and changed to “*rapid transit stops*”.

### **Agree building height of 3 storeys in all areas**

The JCA supports the proposed change to permit 3 dwellings up to 3 storeys in all residential areas.

### **6 storeys height in High Density Residential Zone**

The JCA recommends that the Council officer’s recommendations to change the High Density Definition of Height be rejected and the current statement of “*up to 6 storeys*” be retained throughout the PDP.

### **Infrastructure shortfalls**

JCA recommends that the proposed changes to Point 4 in Recommendation 237 does not proceed and the original wording requiring the provision of adequate infrastructure before development is restored.

JCA also recommends that the District Plan makes an explicit provision for the retention of green spaces both as a requirement within any individual development, at least in the Medium Density Zone, and for the provision of publicly owned parks where private urban green space is small.

**Recommendations from JCA’s Submission of September 2022 on the PDP were:**

27. The JCA requests the WCC fund and complete the planned Moorefield Road roading improvements for the Johnsonville Triangle to support planned population growth.
28. The JCA supports the Green Space Review for Johnsonville and requests it be completed as soon as possible.
29. The JCA requests that development of the Old Library Site be postponed until the Green Space Review is complete.
30. The JCA requests the WCC outline the specific planned investments in each of the above areas that require further investment in facilities and infrastructure.

### **City Outcomes Contribution**

The JCA opposes the inclusion of the “City Outcomes Contributions” and requests these provisions are removed from the PDP and the Design Guides.

### **Setbacks**

The JCA recommends that the front yard setbacks of 1.5 metre be reinstated for residents of a 1-3 residential unit in a high-density residential accommodation.

### **Maximising sunlight:**

The JCA recommends the PDP include a compensation framework for neighbouring residents who suffer a loss of value and amenity due to nearby high-density accommodation housing developments.

The JCA recommends that the proposals by Kirsty Wood and the Newtown Residents Association contained in paragraphs 706 and 707 of the Medium Density Residential Zone document be adopted.

### **Supporting Documents**

Please note, JCA is also submitting two supporting documents:

- 190208 wcc-preliminary-baseline-growth-scenarios-update-BECA.pdf
- 190419 Engagement-Doc-Planning-for-Growth-Scenarios.pdf

These are being submitted as separate files because of their size.

Warren Taylor  
on behalf of the Johnsonville Community Association

# Wellington City – Planning for Future Growth

## Preliminary Baseline Scenario Development

### Results and Methodology

Prepared for Wellington City Council

Prepared by Beca Limited

8 February 2019



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## Appendices

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**Appendix A – Methodology**

**Appendix B – Assumptions**

## Revision History

Revision N°	Prepared By	Description	Date
1	Henry Carthew	Draft for review	20/12/2018
2	Henry Carthew	Issued as final	22/01/2019
3	Henry Carthew	Inclusion of sea level rise in hazard scenario	08/02/2019

## Document Acceptance

Action	Name	Signed	Date
Prepared by	Henry Carthew		08/02/2019
Reviewed by	Alex Fullerton		
Approved by	Nathan Baker		
on behalf of	Beca Limited		

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# 1 Introduction

The Wellington City Council (WCC) is planning for up to 80,000 more residents over the next 30 years. A review of the Urban Growth Plan and the District Plan are underway to provide for this future growth. This is known as the 'Planning for Growth' project. This project responds to the National Policy Statement on Urban Development Capacity (NPS-UDC) which requires the Council to provide sufficient capacity to meet residential demand over the short, medium and long term.

Wellington City has historically maintained a compact urban form and this policy underpins the City's planning documents. The community also confirmed that this approach should be maintained into the future through the Our City Tomorrow engagement which was completed at the end of 2017.

Given the expected growth, and the range of other issues that must be considered (e.g. natural hazard risk, transport infrastructure), WCC is testing its current growth approach (which favours a compact urban form) against alternative approaches.

To highlight the differences in various growth management approaches, this report investigates, at a high-level, some extreme (i.e. deliberately contrasting) scenarios. This preliminary work will help develop baseline information that will allow WCC to develop some more refined scenarios for community engagement in 2019. That engagement will assist the public in understanding the different options for accommodating future growth and how this might impact on their community and the things they value.

The following scenarios were assessed:

Scenario	Summary Description
<b>1. Baseline</b>	Highlights where growth can realistically be accommodated under the current District Plan settings using numbers developed under Council's NPS-UDC model.
<b>2. Suburban Centres</b>	Demonstrates growth focussed around suburban centres. Uplift was based on proximity to sub-regional, district and town centres from the current District Plan.
<b>3. Centralisation</b>	Demonstrates growth focussed in the CBD and inner residential areas.
<b>4. Natural Hazards</b>	Demonstrates growth focussed away from areas at risk of natural hazards and towards town centres and high frequency bus routes.
<b>5. Greenfield</b>	Demonstrates growth focussed in possible future greenfields and the existing and proposed greenfield areas of Upper Stebbings Valley and Lincolnshire Farm in North Wellington.

Population was distributed in these scenarios based on where additional population can be feasibly accommodated (i.e. zoned and serviced by infrastructure).

At this preliminary stage, only growth within the Wellington City boundary has been considered in isolation. Consideration of wider growth trends in the regional context is being undertaken separately to this report.

It is expected that the preferred approach to growth will draw the most desirable aspects of these extreme scenarios into a blended, balanced and more nuanced scenario. The next steps will be to assess the relative benefits of each of these scenarios and explore which elements to take forward for further investigation. This will be the subject of further work in early 2019.

Methodology and assumptions relating to these scenarios have been included in Appendices A and B respectively.

## 2 Results

A summary of the results of the analysis is included below for each scenario. In each scenario, two different growth projections were tested – the medium projection (increase of 50,000 people) and the high projection (increase of 80,000 people). All scenarios build on the baseline scenario (Scenario 1) and include this population growth.

Results of each scenario are mapped into high-level typologies based on density. Figure 1 describes the high-level zone types and the different typologies expected in each zone. Map 1 on the following page shows the suburbs and the higher level areas which have been used to summarise the results of each scenario. These areas are the ‘sectors’ which have been used for the NPS-UDC modelling.



Figure 1: Visualisation of high level zones and typologies



GIE@beca.com  
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 Name of Map: Overview Map  
 Author: HEC  
 Date: 17/01/2019

Map 1: Wellington City Suburbs and NPS Zones



## 2.1 Scenario 1: Baseline

### Overview

This scenario highlights where growth can realistically be accommodated under the current District Plan settings using numbers developed under Council's NPS-UDC model.

The residential capacity model developed by Council in response to the NPS-UDC is a multi-step development feasibility model that assesses the city parcel by parcel. Each parcel is compared for an infill development, if possible, but also a comprehensive redevelopment. And each parcel is developed for a range of typologies, as appropriate according to the zoning, including standalone housing, terrace housing or an apartment.

In this scenario only those realisable developments have been included. That is parcels that have been assessed as being economically feasible under the NPS-UDC model with a rate reduction to account for the fact that not everything that is economically feasible will be developed.

Two greenfield areas have also been included – Upper Stebbings and Lincolnshire Farm in North Wellington. Both areas were identified as future growth areas in the Northern Growth Management Framework adopted by Council in 2003. Lincolnshire Farm is already identified in the District Plan as a greenfield area, with an accompanying structure plan. A structure plan for Upper Stebbings is currently being developed and will require a District Plan change to enable development in this area.

Ohariu, Makara and Makara Beach were not modelled as part of the NPS-UDC and so have not been included in the scenario.

### Results

The results of this modelling has been summarised into areas in the table below and shown in Map 2.

Area	2018 Population Estimate*	Estimated Population growth 2018-48*	Realisable Population Estimate**	Shortfall
East Wellington	36,630	6,460	3,980	2,480
Inner Wellington	35,150	13,190	2,102	11,088
North Wellington	49,900	20,970	13,317	7,653
South Wellington	23,000	4,910	684	4,226
Wellington Central/CBD	21,560	17,800	15,499	2,300
West Wellington	49,910	7,260	8,591	-
Total	216,150	70,590	44,173	27,747

\*Based on Forecast ID 2018 High projection.

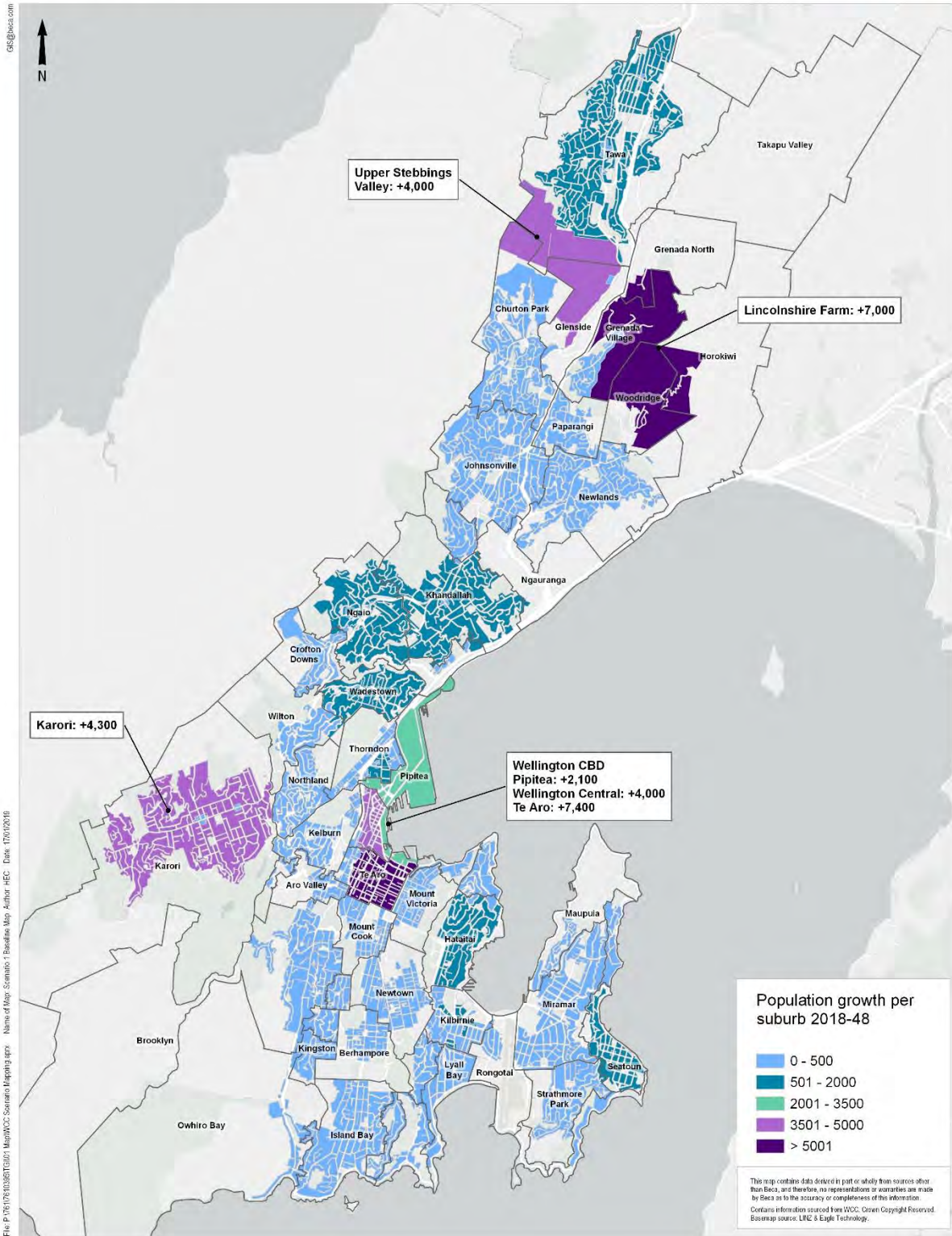
\*\*Based on NPS-UDC modelling

These results indicate that under the current district plan including existing and proposed greenfields Wellington City could accommodate an additional 44,000 people. However, population projections for Wellington City predict an increase of between 50 and 80,000 people over the next thirty years, therefore this shortfall in population will need to be accommodated through modification to the WCC District Plan. The shortfall by area is illustrated in Map 3. None of the scenarios modelled consider infrastructure capacity. An assessment of this will be undertaken as part of the next phase of multi criteria analysis work.

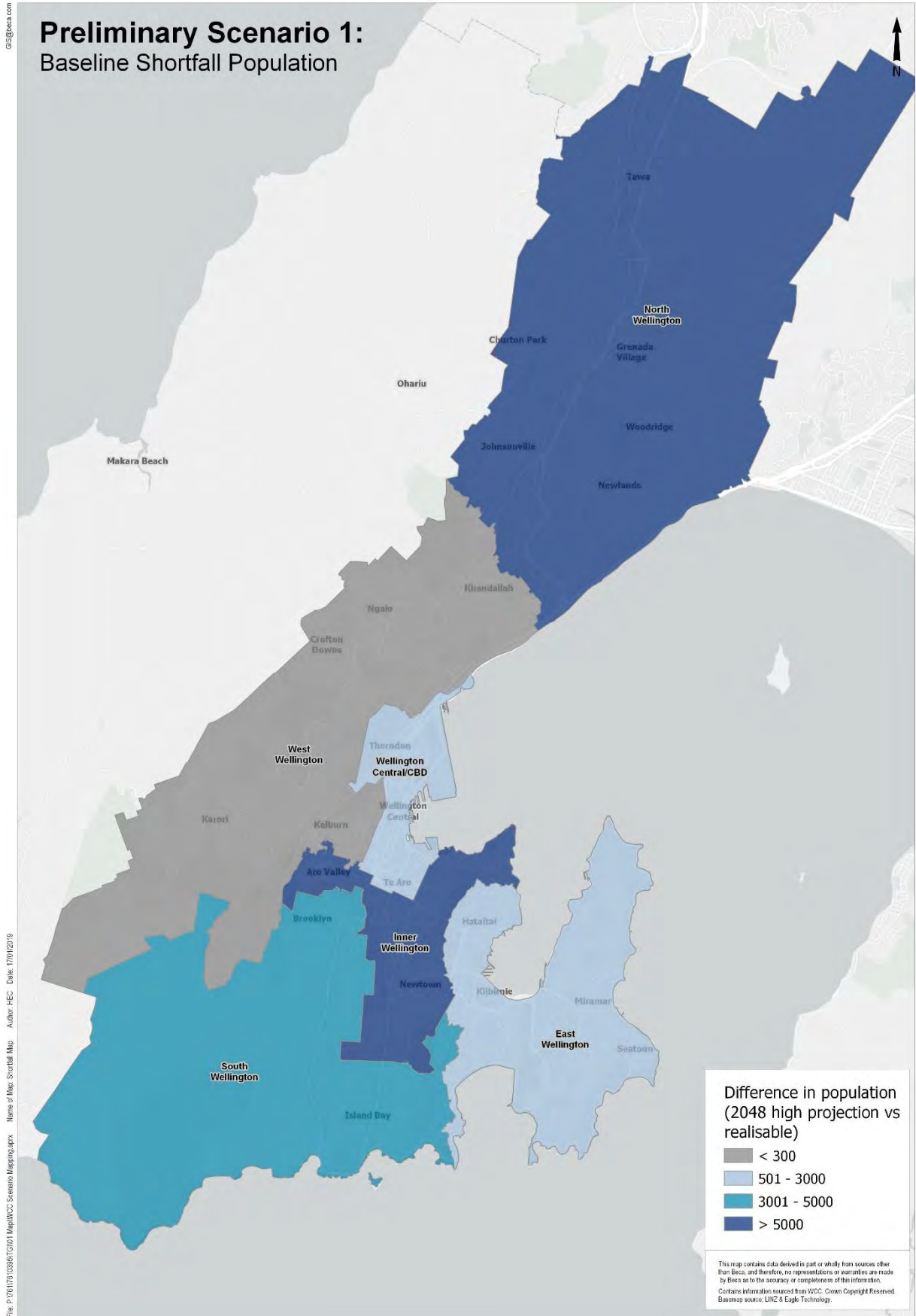
# Preliminary Scenario 1: Baseline

This scenario demonstrates the realisable population under current district plan provisions using NPS-UDC modelling over a 30 year time period to 2048.

Infill and redevelopment population: **33,000**  
 Greenfield population: **11,000**  
**Total additional population accommodated: 44,000**



Map 2: Baseline Population Growth



GIS@becca.com  
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Map 3: Population Shortfall



## 2.2 Scenario 2: Suburban Centres

### Overview

This scenario demonstrates growth focussed around suburban centres. Growth was distributed based on proximity to sub-regional, district and town centres from the current District Plan.

### Results

Figure 2 highlights the population difference by typologies between the baseline scenario and the 50,000 and 80,000 Suburban Centres scenarios modelled.

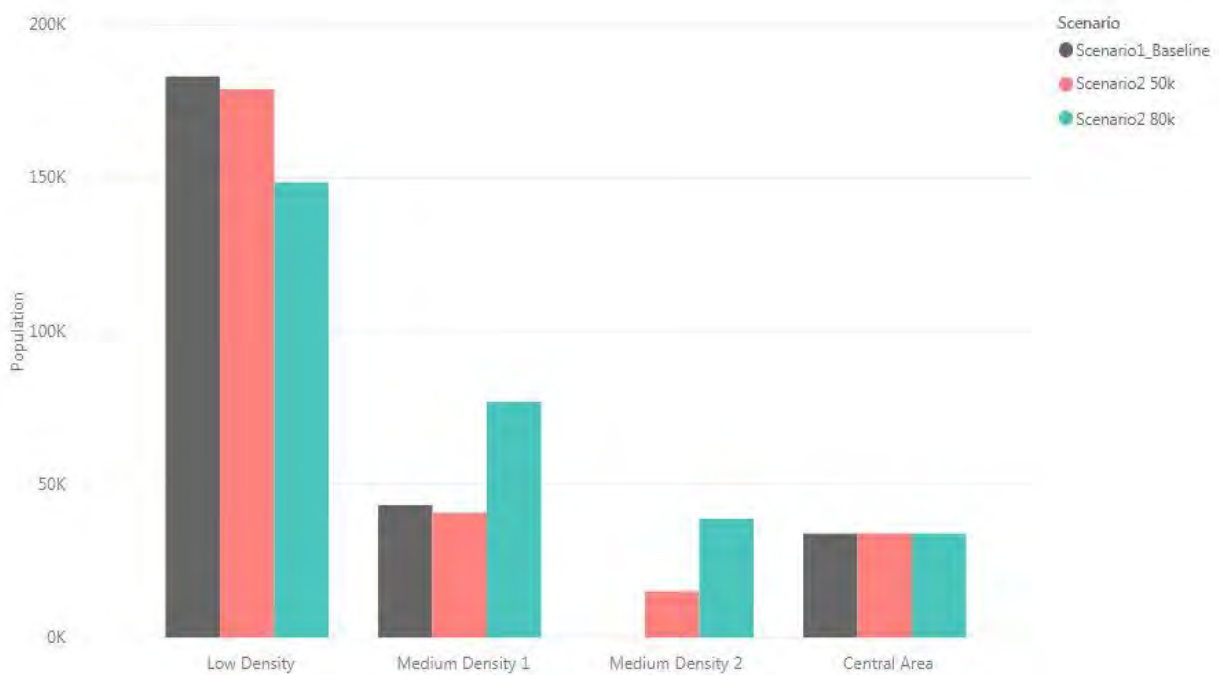
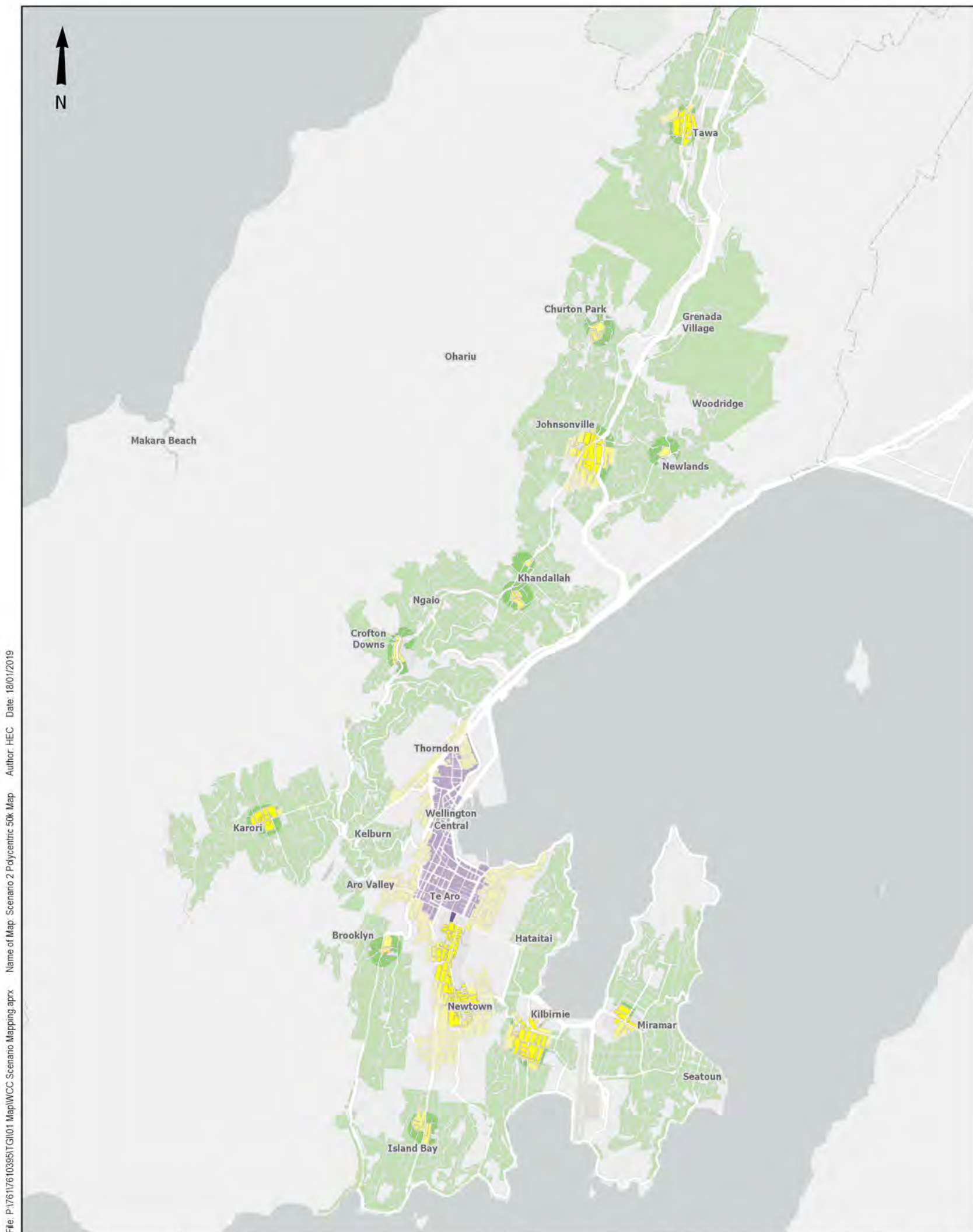


Figure 2: Suburban Centres Scenario – Typology and Population Changes

Ohariu, Makara and Makara Beach were not affected by this scenario and therefore have not been included.

The 50,000 scenario would see some more medium density housing in Newtown, Karori and Miramar with other suburban centres remaining largely unchanged. The 80,000 scenario illustrates a significant amount more medium density housing with some suburbs undergoing substantial change – in particular Karori, Miramar, Johnsonville and Tawa where the housing typology allows for low rise apartments (up to 4 floors). The preliminary changes for this scenario are highlighted on the following page.





## Preliminary Scenario 2: Suburban Centres

Infill, redevelopment and greenfields: **44,000**  
 New population around centres: **6,000**  
 Total additional population accommodated: **50,000**

This scenario demonstrates growth focussed around suburban centres.

### Estimated population by typology

Typology	Total Population 2048
Low Density	177,660
Medium Density 1	40,396
Medium Density 2	14,914
High Density 1	-
Central Area	33,663
<b>Total</b>	<b>266,633</b>

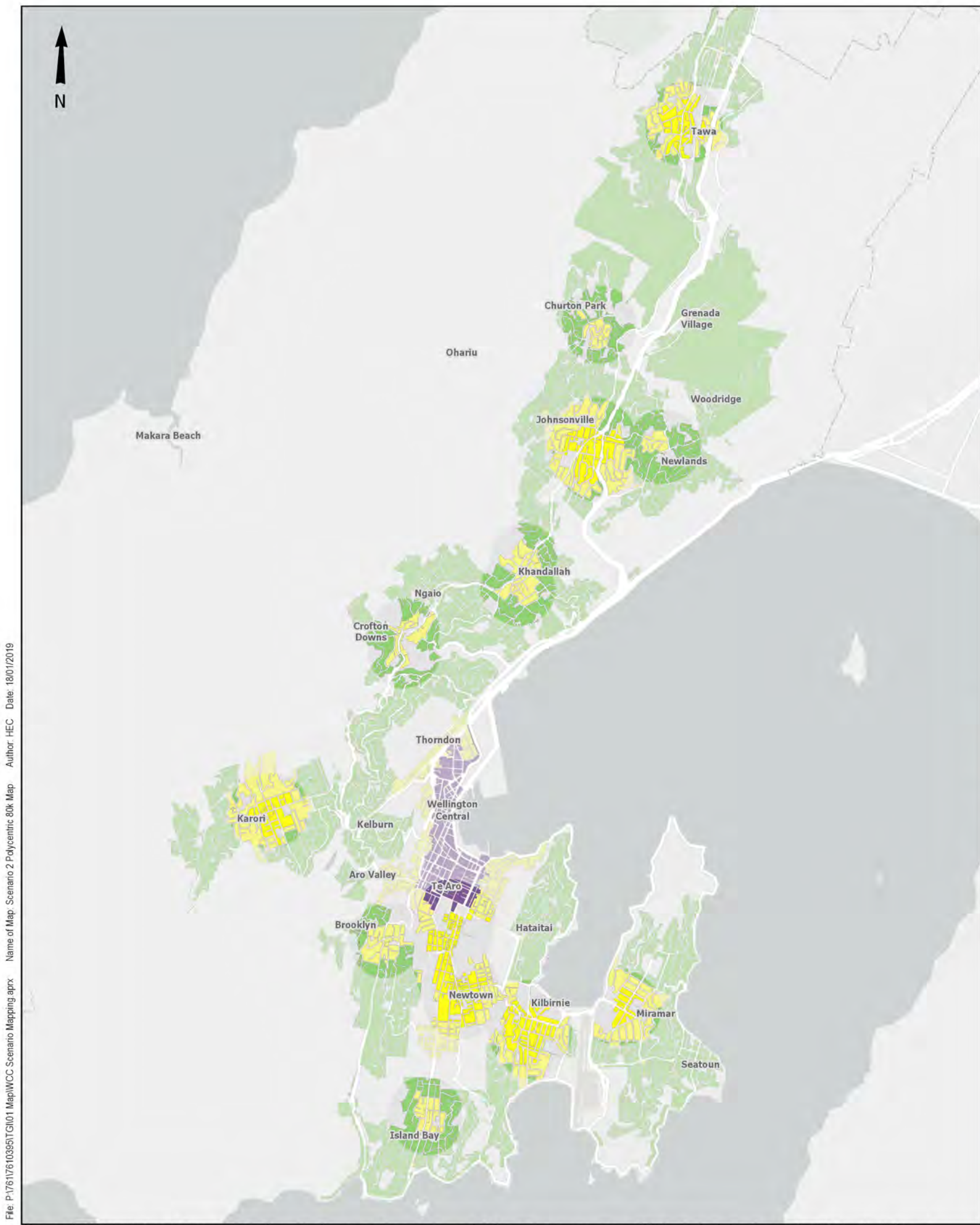
### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 2 Growth	Total Population 2048
East Wellington	36,637	3,980	853	41,470
Inner Wellington	35,152	2,102	884	38,138
North Wellington	49,904	13,317	2,578	65,799
South Wellington	22,990	684	503	24,177
Wellington Central/CBD	21,578	15,499	581	37,658
West Wellington	49,893	8,591	908	59,392
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>6,306</b>	<b>266,633</b>

- Low Density
- Medium Density 1
- Medium Density 2
- Central Area
- Other







## Preliminary Scenario 2: Suburban Centres

Infill, redevelopment and greenfields: **44,000**  
 New population around centres: **36,000**  
 Total additional population accommodated: **80,000**

This scenario demonstrates growth focussed around suburban centres.

### Estimated population by typology

Typology	Total Population 2048
Low Density	147,613
Medium Density 1	76,376
Medium Density 2	38,448
High Density 1	-
Central Area	33,688
<b>Total</b>	<b>296,125</b>

### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 2 Growth	Total Population 2048
East Wellington	36,637	3,980	5,400	46,017
Inner Wellington	35,152	2,102	1,918	39,172
North Wellington	49,904	13,317	14,060	77,281
South Wellington	22,990	684	3,876	27,550
Wellington Central/CBD	21,578	15,499	725	37,802
West Wellington	49,893	8,591	9,819	68,303
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>35,798</b>	<b>296,125</b>

- Low Density
- Medium Density 1
- Medium Density 2
- Central Area
- Other



## 2.3 Scenario 3: Centralisation

### Overview

This scenario demonstrates growth focussed in the CBD and inner residential areas.

### Results

Figure 3 highlights the population difference by typologies between the baseline scenario and the 50,000 and 80,000 centralisation scenarios modelled.

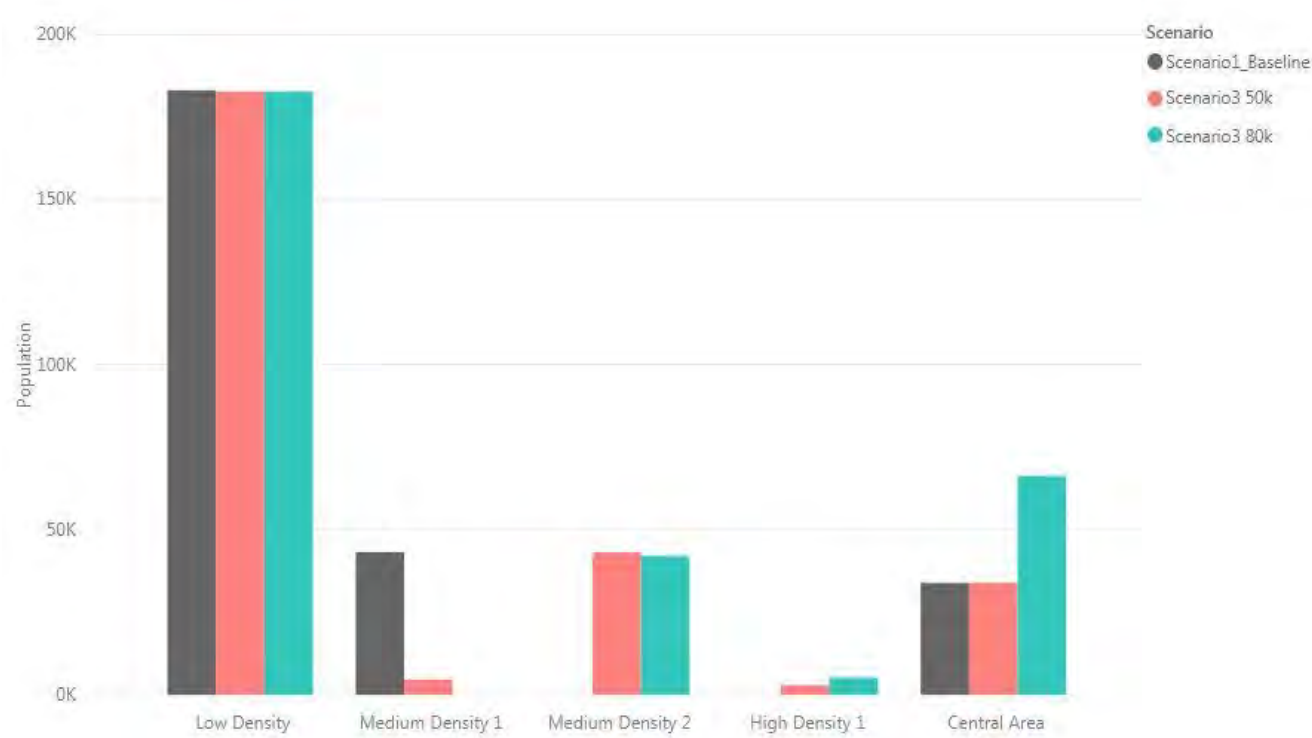
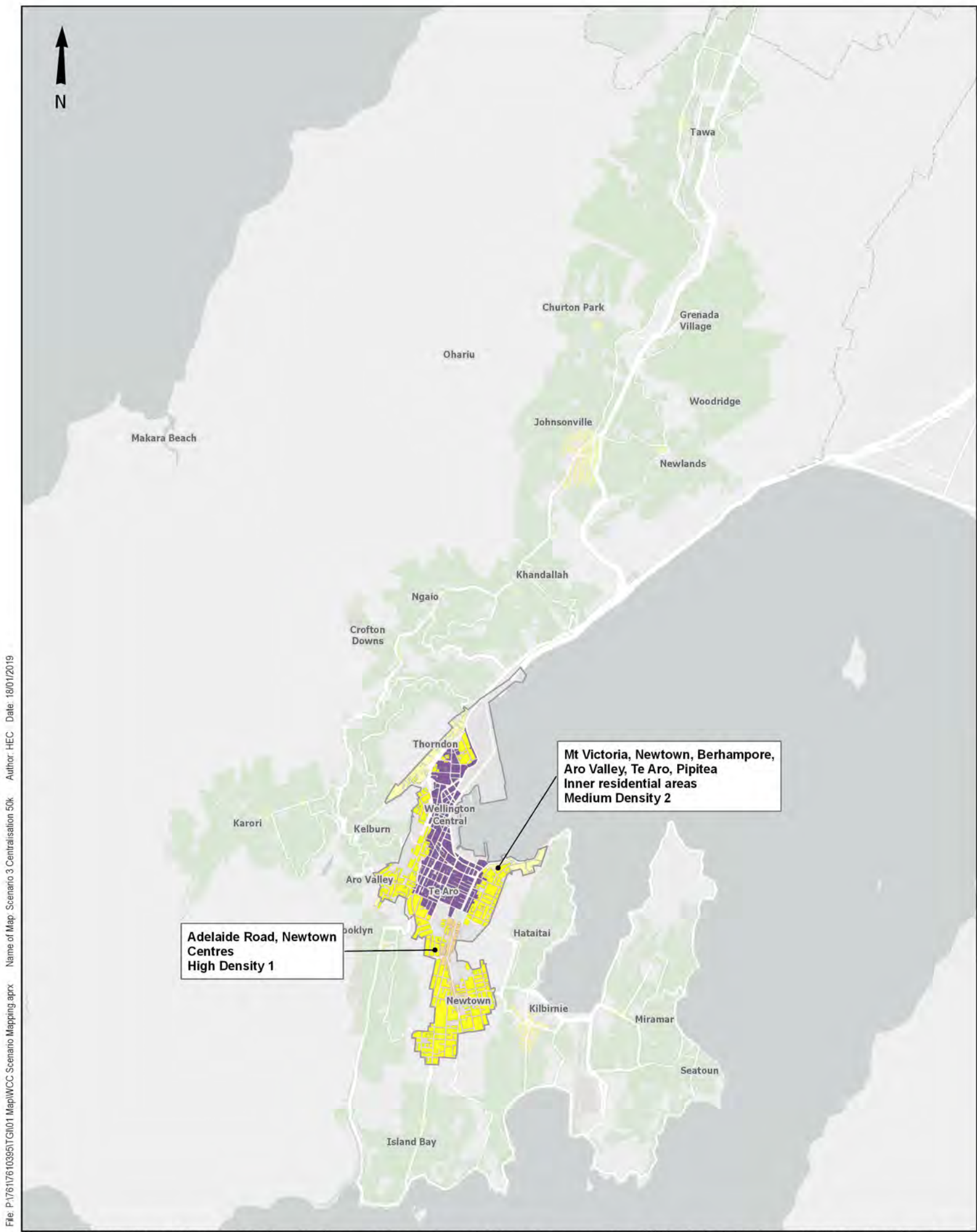


Figure 3: Centralisation Scenario - Typology and Population Changes

Ohariu, Makara and Makara Beach were not affected by this scenario and therefore have not been included.

The 50,000 scenario sees a general increase in medium density in the inner residential areas changing from current provisions to allow for some low-rise apartments (up to 4 floors) and medium rise apartments (up to 6 floors) in Newtown and along Adelaide Road. The 80,000 scenario increases the number of medium density areas in the inner residential zone, expands the area of mid-rise apartments in Newtown and Adelaide Road and adds a significant number of high rise apartments in the CBD. A small amount of population is accommodated in the inner residential areas with a significant increase in population in the Wellington CBD. The preliminary changes for this scenario are highlighted on the following page.





### Preliminary Scenario 3: Centralisation

Infill, redevelopment and greenfields: **44,000**  
 New population in inner residential areas: **6,000**  
 Total additional population accommodated: **50,000**

This scenario demonstrates growth focussed in the CBD and inner residential areas.

#### Estimated population by typology

Typology	Total Population 2048
Low Density	182,425
Medium Density 1	4,592
Medium Density 2	43,086
High Density 1	2,870
Central Area	33,857
<b>Total</b>	<b>266,831</b>

#### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 3 Growth	Total Population 2048
East Wellington	36,637	3,980	-	40,617
Inner Wellington	35,152	2,102	5,064	42,318
North Wellington	49,904	13,317	-	63,221
South Wellington	22,990	684	-	23,674
Wellington Central/CBD	21,578	15,499	1,440	38,517
West Wellington	49,893	8,591	-	58,484
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>6,504</b>	<b>266,831</b>

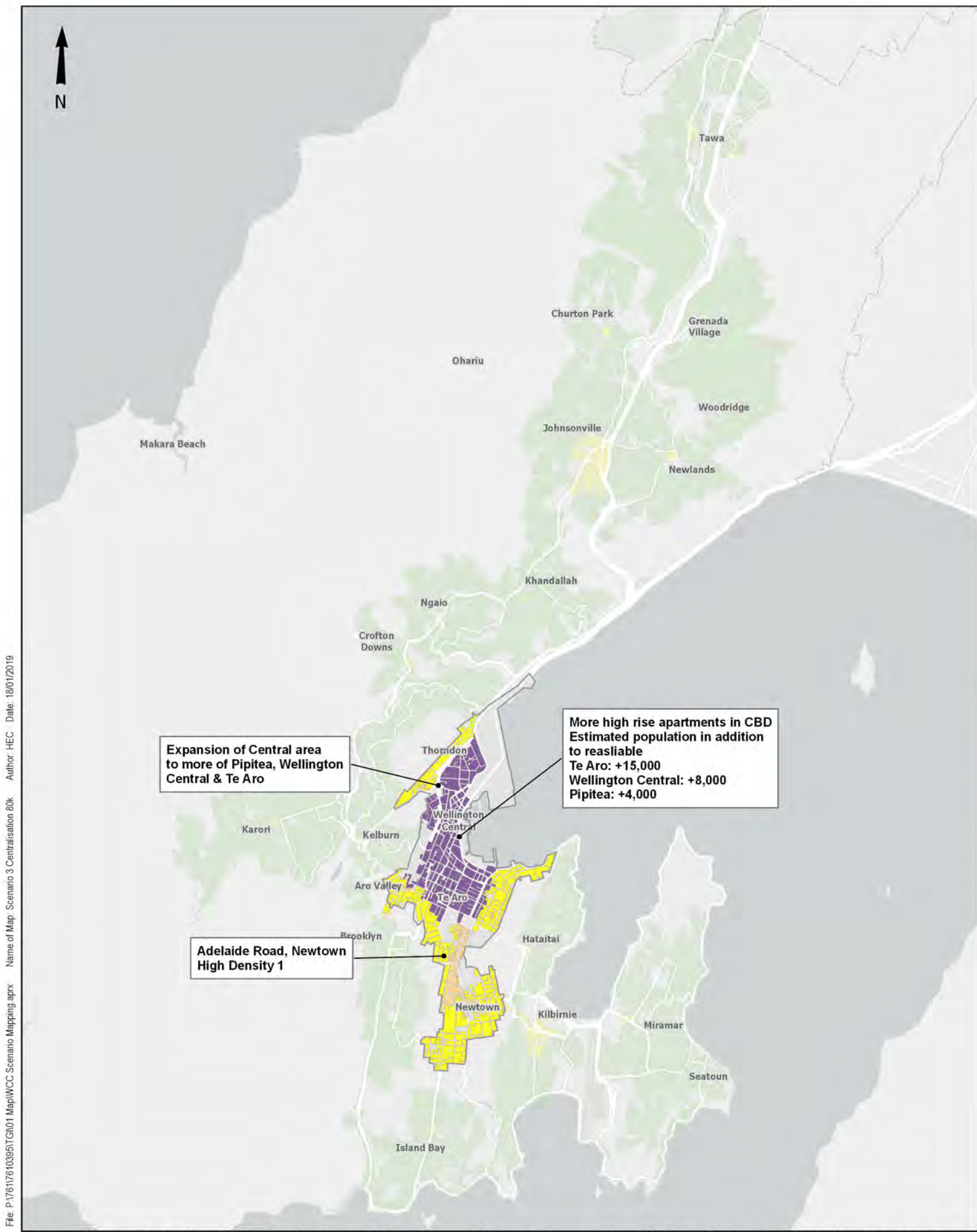
- Low Density
- Medium Density 1
- Medium Density 2
- High Density 1
- Central Area
- Other



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### Preliminary Scenario 3: Centralisation

Infill, redevelopment and greenfields: **44,000**  
 New population in central area: **27,000**  
 New population in inner residential areas: **9,000**  
 Total additional population accommodated: **80,000**

This scenario demonstrates growth focussed in the CBD and inner residential areas.

#### Estimated population by typology

Typology	Total Population 2048
Low Density	182,576
Medium Density 1	-
Medium Density 2	42,075
High Density 1	5,200
Central Area	66,294
<b>Total</b>	<b>296,146</b>

#### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 3 Growth	Total Population 2048
East Wellington	36,637	3,980	-	40,617
Inner Wellington	35,152	2,102	6,077	43,331
North Wellington	49,904	13,317	-	63,221
South Wellington	22,990	684	-	23,674
Wellington Central/CBD	21,578	15,499	29,742	66,819
West Wellington	49,893	8,591	-	58,484
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>35,819</b>	<b>296,146</b>

- Low Density
- Medium Density 1
- Medium Density 2
- High Density 1
- Central Area
- Other



## 2.4 Scenario 4: Natural Hazards

### Overview

This scenario demonstrates growth focussed away from areas at risk of natural hazards and towards town centres and high frequency bus routes. Ground shaking, liquefaction, tsunami risk, sea level rise and flooding were considered as the key natural hazards in this scenario. This is based on the WCC District Plan hazard maps.

### Results

Figure 4 highlights the population difference by typologies between the baseline scenario and the 50,000 and 80,000 natural hazard scenarios modelled.

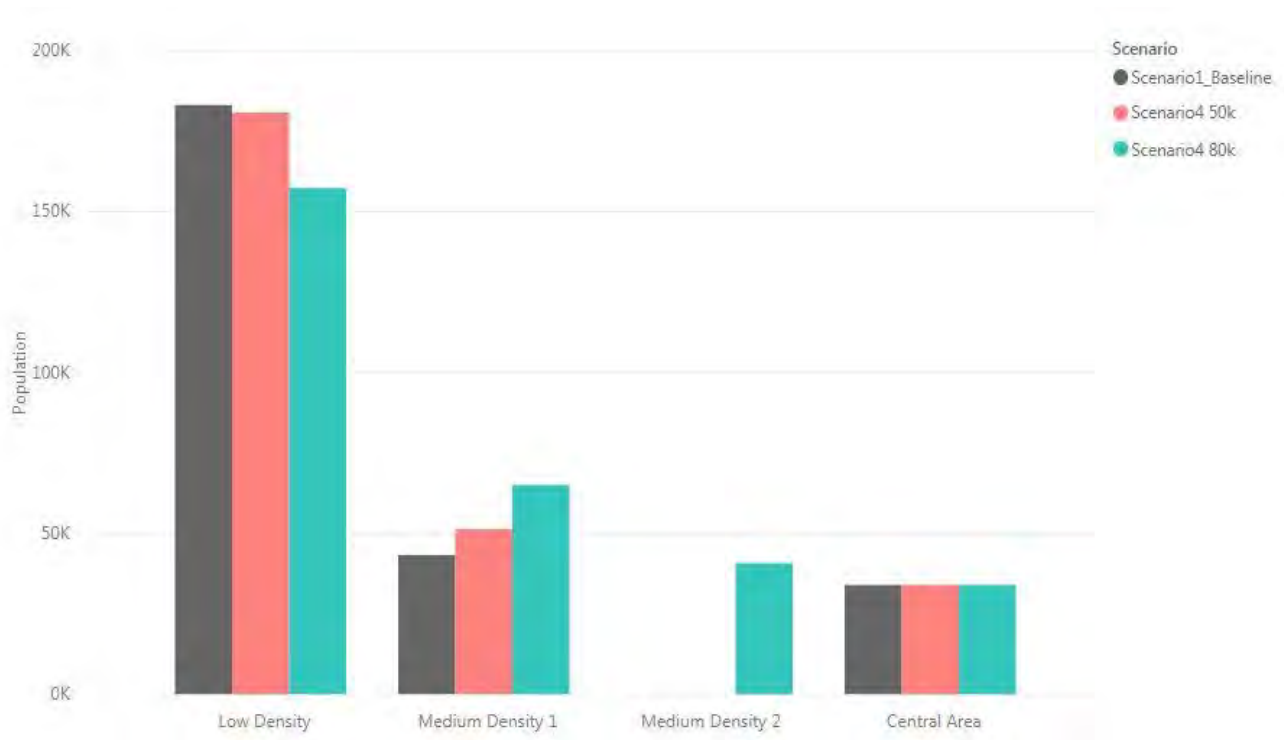


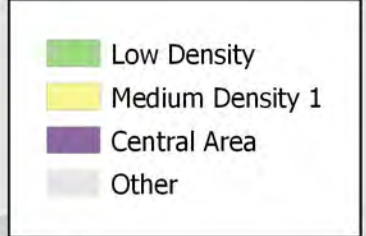
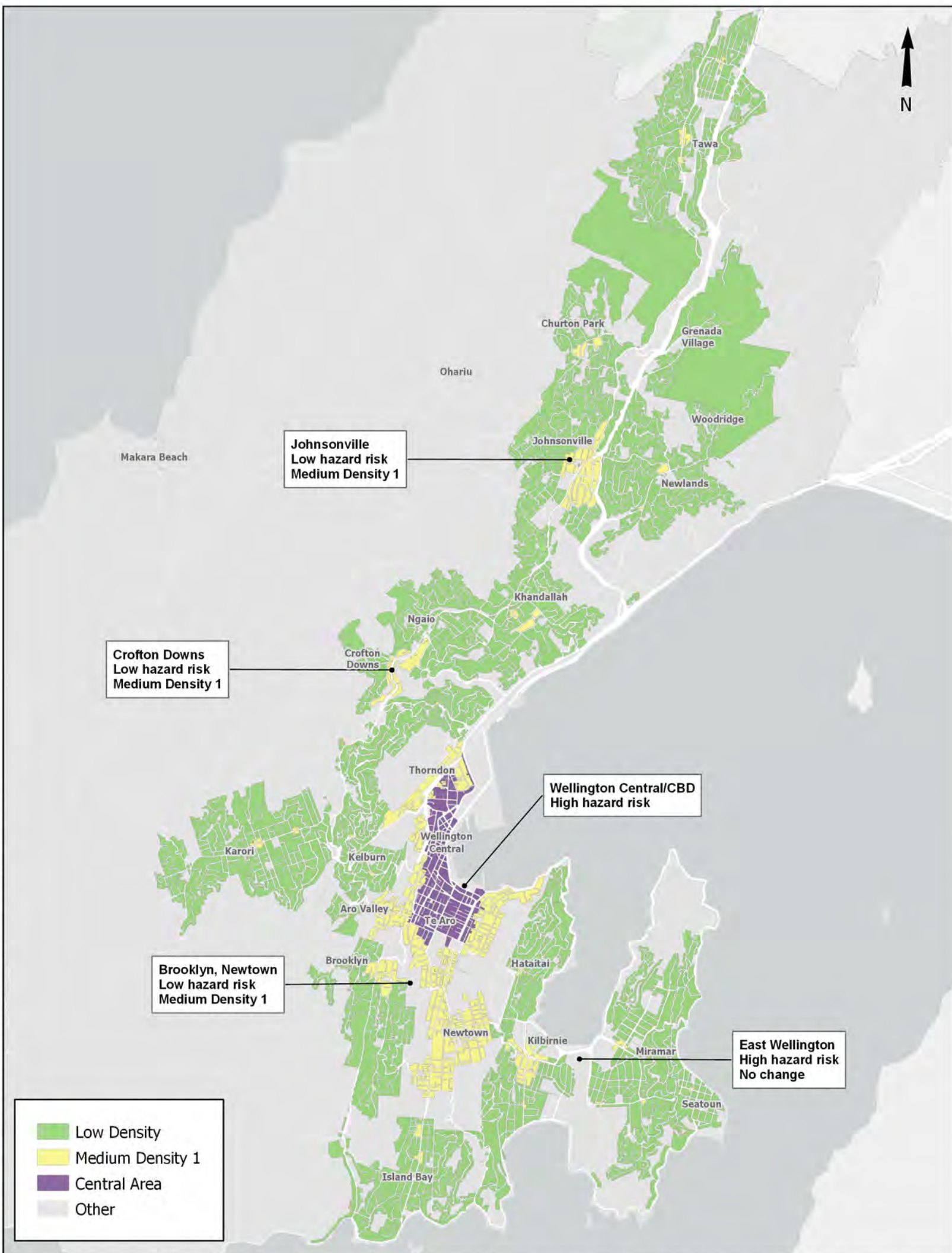
Figure 4: Natural Hazard Scenario - Typology and Population Changes

Ohariu, Makara and Makara Beach were not affected by this scenario and therefore have not been included.

The 50,000 scenario shows a general increase in medium density 1 typologies (mix of detached and terraced houses) in the inner residential areas and Brooklyn/Crofton Downs. The 80,000 scenario increases medium density 1 provisions in Karori, Broadmeadows and Northland with more medium density 2 in Newtown, Brooklyn, Tawa, Crofton Downs, Johnsonville and Newlands. The CBD and East Wellington areas remain largely unchanged due to their comparatively high hazard risk. The preliminary changes for this scenario are highlighted on the following page.



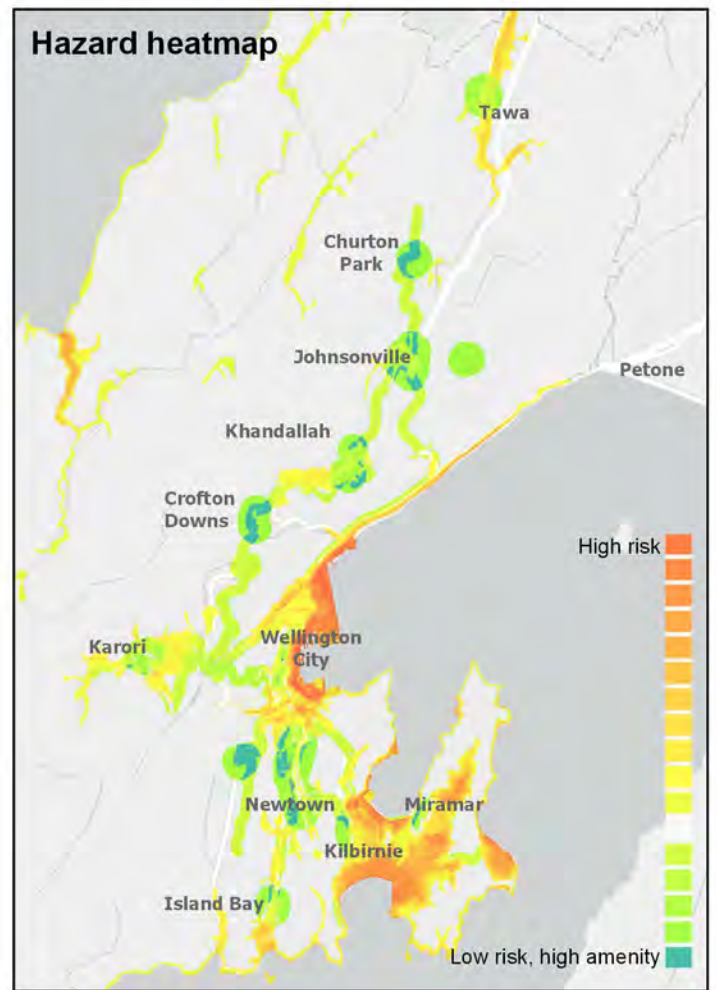
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## Preliminary Scenario 4: Natural Hazards

Infill, redevelopment and greenfields: **44,000**  
 New population away from hazards: **6,000**  
 Total additional population accommodated: **50,000**

This scenario demonstrates growth focussed away from areas at risk of natural hazards and towards town centres and high frequency bus routes.



### Estimated population by typology

Typology	Total Population 2048
Low Density	180,814
Medium Density 1	51,283
Medium Density 2	-
High Density 1	-
Central Area	33,914
<b>Total</b>	<b>266,011</b>

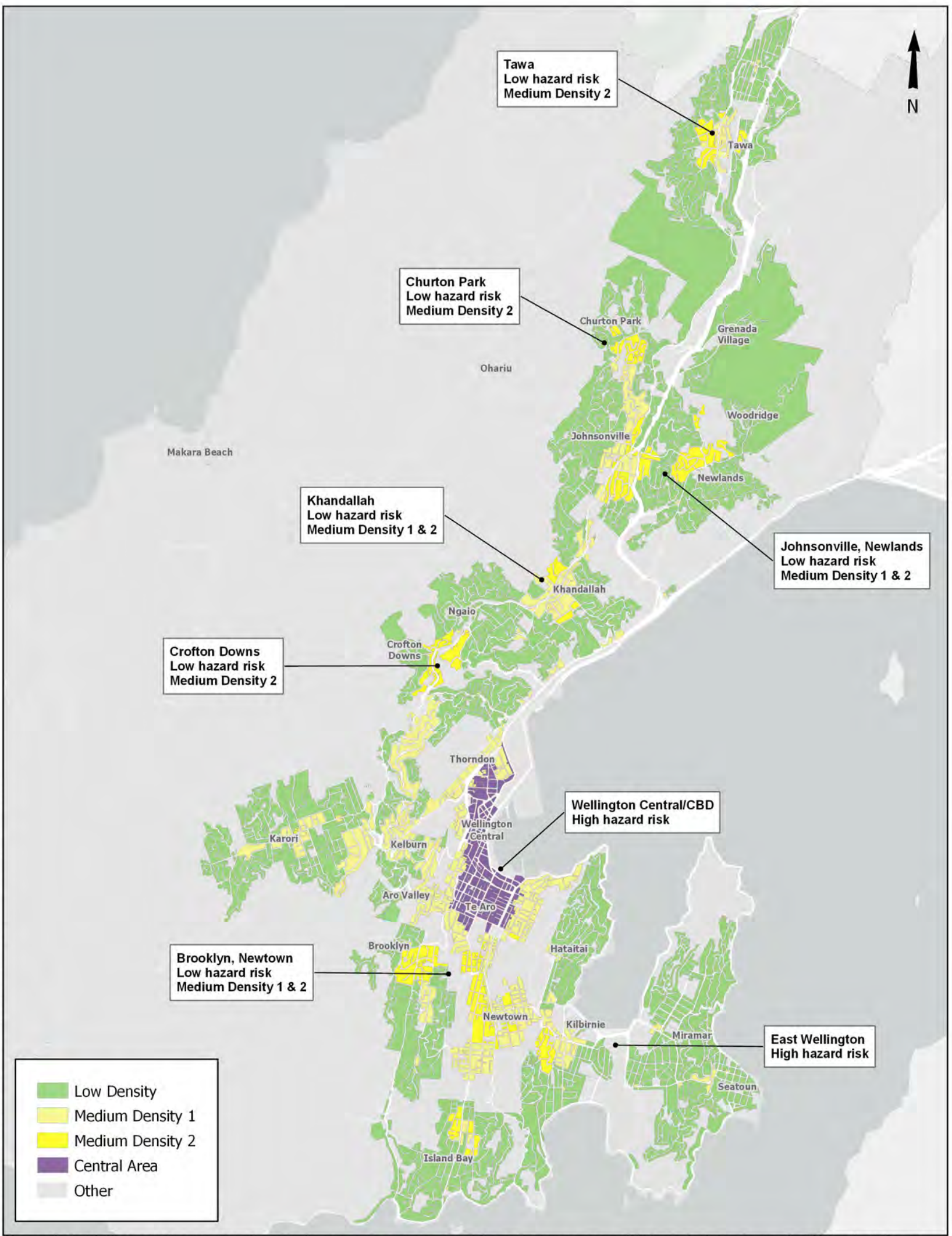
### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 4 Growth	Total Population 2048
East Wellington	36,637	3,980	-	40,617
Inner Wellington	35,152	2,102	774	38,028
North Wellington	49,904	13,317	1,584	64,805
South Wellington	22,990	684	1,190	24,864
Wellington Central/CBD	21,578	15,499	765	37,842
West Wellington	49,893	8,591	1,371	59,855
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>5,684</b>	<b>266,011</b>



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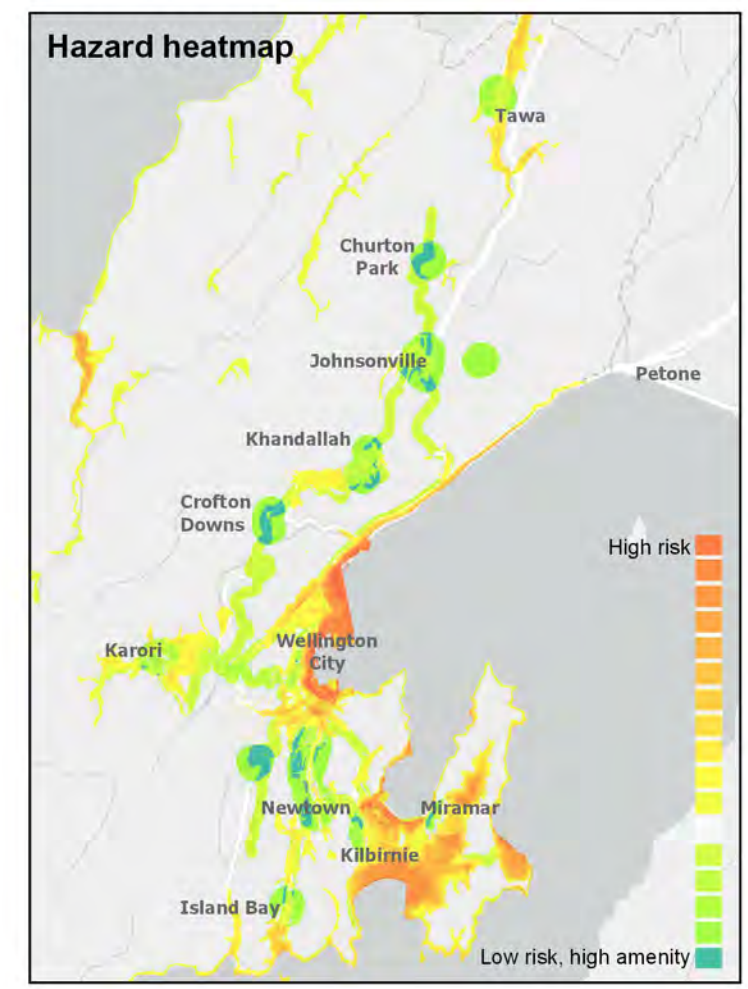




## Preliminary Scenario 4: Natural Hazards

Infill, redevelopment and greenfields: **44,000**  
 New population away from hazards: **36,000**  
 Total additional population accommodated: **80,000**

This scenario demonstrates growth focussed away from areas at risk of natural hazards and towards town centres and high frequency bus routes.



### Estimated population by typology

Typology	Total Population 2048
Low Density	157,330
Medium Density 1	65,031
Medium Density 2	40,708
High Density 1	-
Central Area	33,915
<b>Total</b>	<b>296,984</b>

### Estimated population by area

Area	Current Population	Baseline scenario growth	Scenario 4 Growth	Total Population 2048
East Wellington	36,637	3,980	1,141	41,758
Inner Wellington	35,152	2,102	1,763	39,017
North Wellington	49,904	13,317	13,603	76,824
South Wellington	22,990	684	6,713	30,387
Wellington Central/CBD	21,578	15,499	785	37,862
West Wellington	49,893	8,591	12,652	71,136
<b>Total</b>	<b>216,154</b>	<b>44,173</b>	<b>36,657</b>	<b>296,984</b>



## 2.5 Scenario 5: Greenfield Development

### Overview

This scenario demonstrates how growth could be distributed in new and ‘already planned’ greenfield areas ( Upper Stebbings and Lincolnshire Farm in North Wellington). Both areas were identified as future growth areas in the Northern Growth Management Framework adopted by Council in 2003. A possible future greenfield site in Ohariu has also been identified based on slope and proximity to existing infrastructure (indicating where it would be easier and more cost efficient for development).

### Results

Figure 5 highlights the population difference by typologies between the baseline scenario and the 50,000 and 80,000 greenfield scenarios modelled.

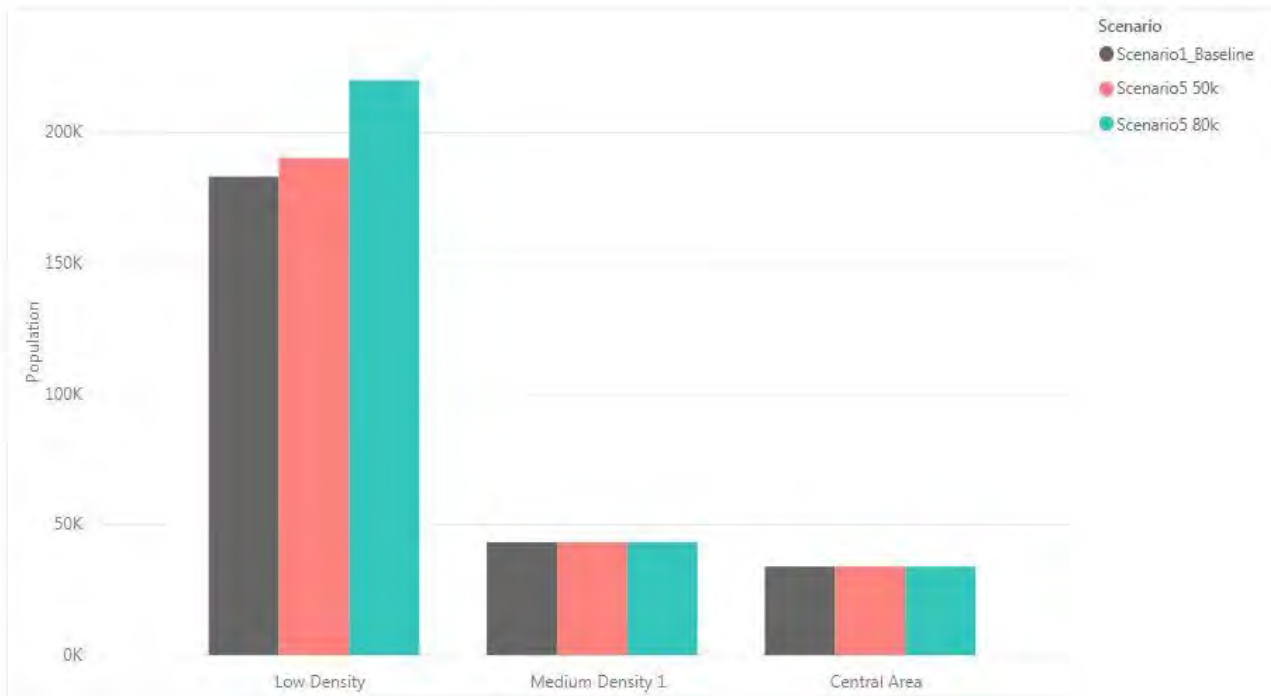


Figure 5: Greenfield Scenario - Typology and Population Changes

The 50,000 scenario shows a slight increase in low density housing through a new greenfield area in Ohariu. At a density of approximately 12 dwellings per hectare this area (with existing and proposed greenfields Lincolnshire Farm and Upper Stebbings Valley remaining as they are) could accommodate the proposed shortfall if population was to increase by 50,000 over the next 30 years. If the population increase was closer to 80,000 the new Ohariu greenfield area would need to be vastly expanded and could accommodate up to 28,500. Without any other zone changes across the rest of Wellington the remaining population would be accommodated by increasing the density in the Upper Stebbings and Lincolnshire Farm areas from 6 dwellings per hectare to 12 dwellings per hectare.

This scenario is based on a density of 20 dwellings per hectare in the Ohaiu area and all additional population is in the North Wellington area. Both of these scenarios would have a significant impact on the current makeup of Ohariu Valley and would require more detailed investigation into the viability and cost of such development. The preliminary changes for this scenario are highlighted on the following page.

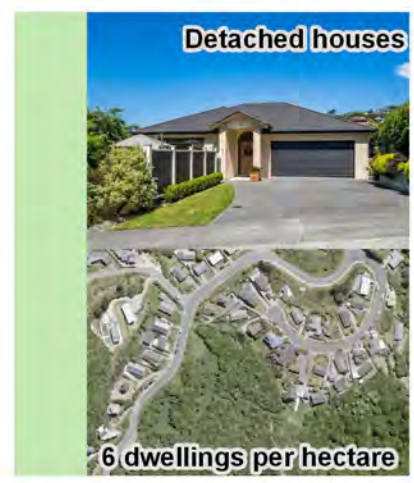
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## Preliminary Scenario 5: Greenfield Development

This scenario demonstrates growth focussed in greenfield sites.

Infill and redevelopment: **33,000**  
 Existing and proposed greenfields: **11,000**  
 Possible future greenfields: **6,000**  
**Total additional population accommodated: 50,000**



### Existing and Proposed Greenfields

Upper Stebbings and Lincolnshire Farm in North Wellington were identified as future growth areas in the Northern Growth Management Framework adopted by Council in 2003.

In this scenario population estimates are based on the current projected number of dwellings for these areas.

400ha Lincolnshire Farm: estimated 7000 people  
 250ha Upper Stebbings Valley: estimated 4000 people

This is a density of approximately 6 dwellings per hectare.



### Possible Future Greenfield

Based on slope and access to existing infrastructure a potential new greenfield area has been identified at Ohariu.

230ha Ohariu: estimated 6000 population.

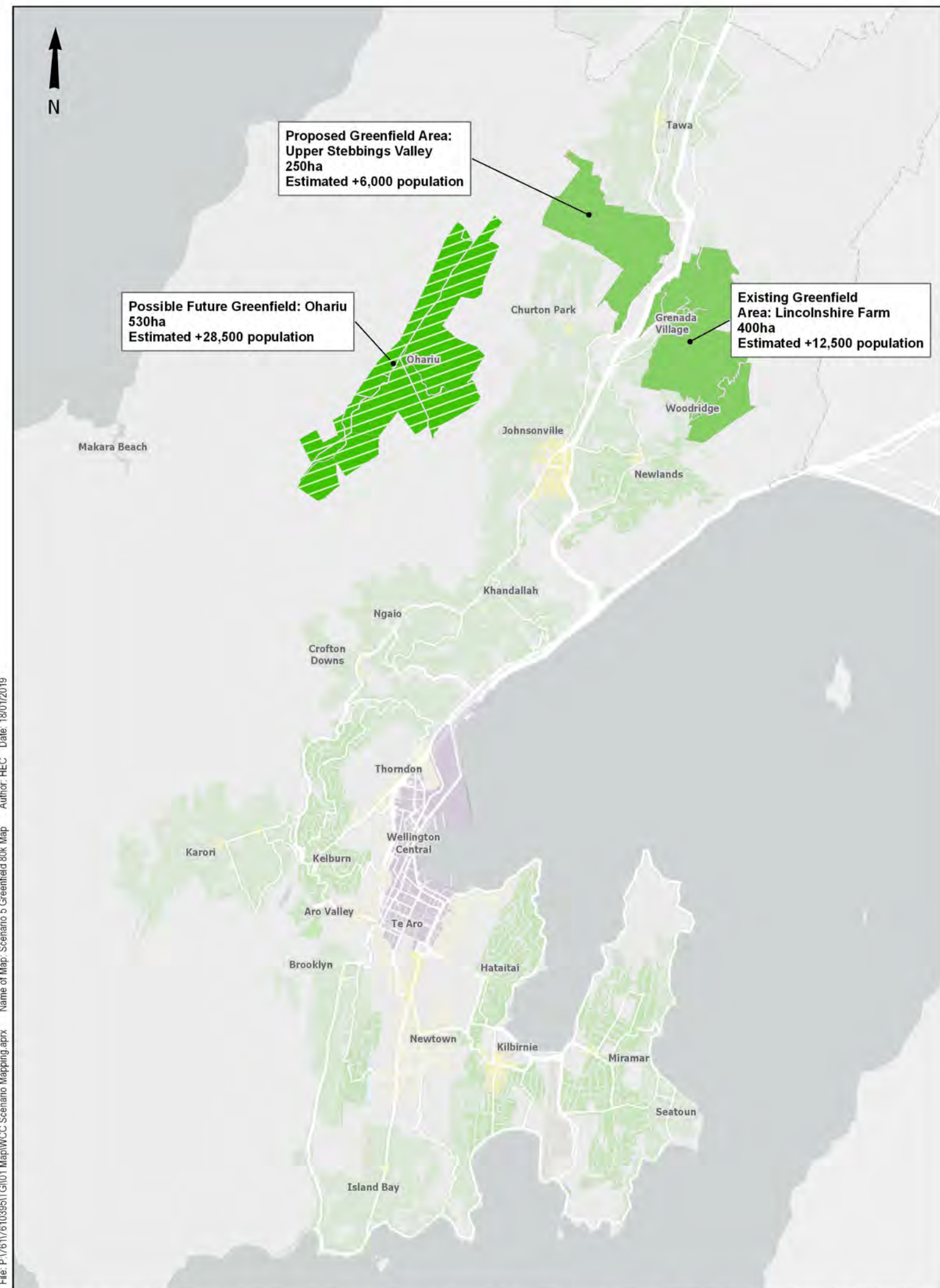
This is a density of approximately 12 dwellings per hectare.

### Estimated population by typology

Typology	Total Population 2048
Low Density	190,254
Medium Density 1	43,247
Medium Density 2	-
High Density 1	-
Central Area	33,915
<b>Total</b>	<b>267,416</b>



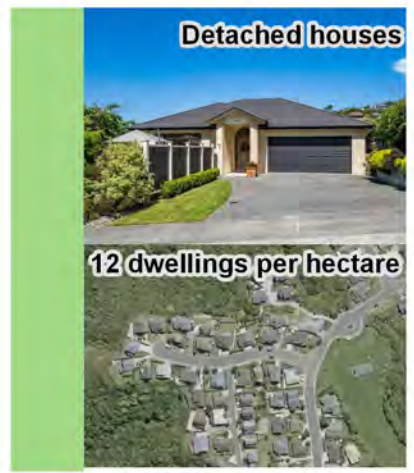




# Preliminary Scenario 5: Greenfield Development

This scenario demonstrates growth focussed in greenfield sites.

Infill and redevelopment: **33,000**  
 Existing and proposed greenfields: **18,500**  
 Possible future greenfields: **28,500**  
 Total additional population accommodated: **80,000**



## Existing and Proposed Greenfields

Upper Stebbings and Lincolnshire Farm in North Wellington were identified as future growth areas in the Northern Growth Management Framework adopted by Council in 2003.

In this scenario the population in these greenfield areas has been increased to a higher density (12 dwellings per hectare) than the current estimated number of dwellings.

400ha Lincolnshire Farm: estimated 12,500 people  
 250ha Upper Stebbings Valley: estimated 6,000 people



## Possible Future Greenfield

Based on slope and access to existing infrastructure a potential new greenfield area has been identified at Ohariu.

530ha Ohariu: estimated 28,500 population.

This is a density of approximately 20 dwellings per hectare.

### Estimated population by typology

Typology	Total Population 2048
Low Density	220,010
Medium Density 1	43,247
Medium Density 2	-
High Density 1	-
Central Area	33,915
<b>Total</b>	<b>297,172</b>

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This map contains data derived in part or wholly from sources other than Beca, and therefore, no representations or warranties are made by Beca as to the accuracy or completeness of this information. Contains information sourced from WCC. Crown Copyright Reserved.



### 3 Overall Findings

This assessment has been undertaken at a high-level as a preliminary exercise to investigate deliberately contrasting scenarios. It is not intended that any one of these scenarios will be viable on their own, each have advantages and disadvantages to be further assessed.

The overall findings are summarised as follows:

Scenario	Summary of overall findings
<b>1. Baseline</b>	Based on the NPS-UDC dwelling numbers provided current plan provisions will only accommodate an additional 44,000 people. However, population projections for Wellington City predict an increase of between 50 and 80,000 people over the next thirty years. This scenario does not cater for the expected growth and therefore is not an acceptable way forward.
<b>2. Suburban Centres</b>	The Suburban Centres scenario primarily allows for more medium density housing around the suburban centres. This includes inner residential areas but also highlights that significant increases in density may be required in some of the outer residential areas.
<b>3. Centralisation</b>	The centralisation scenario would see a large increase in density in the inner residential areas and more high-density apartments in the CBD. To accommodate 80,000 people, more than 25,000 of these would likely need to be in the currently zoned central area. This is unlikely to be very plausible, therefore elements from other scenarios would also need to be considered.
<b>4. Natural Hazards</b>	Much of East and Central Wellington are at risk from natural hazards, therefore the natural hazard scenario sees more medium density housing in West and North Wellington.
<b>5. Greenfield</b>	The greenfield scenario (without changes in any other areas) would have a significant impact on the current makeup of Ohariu Valley which is currently zoned as Rural. A population increase from the current 800 to between 6,000 and 30,000 would be required.

Community consultation will be required under all scenarios outlined above.



# A

## Appendix A – Methodology

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## Methodology

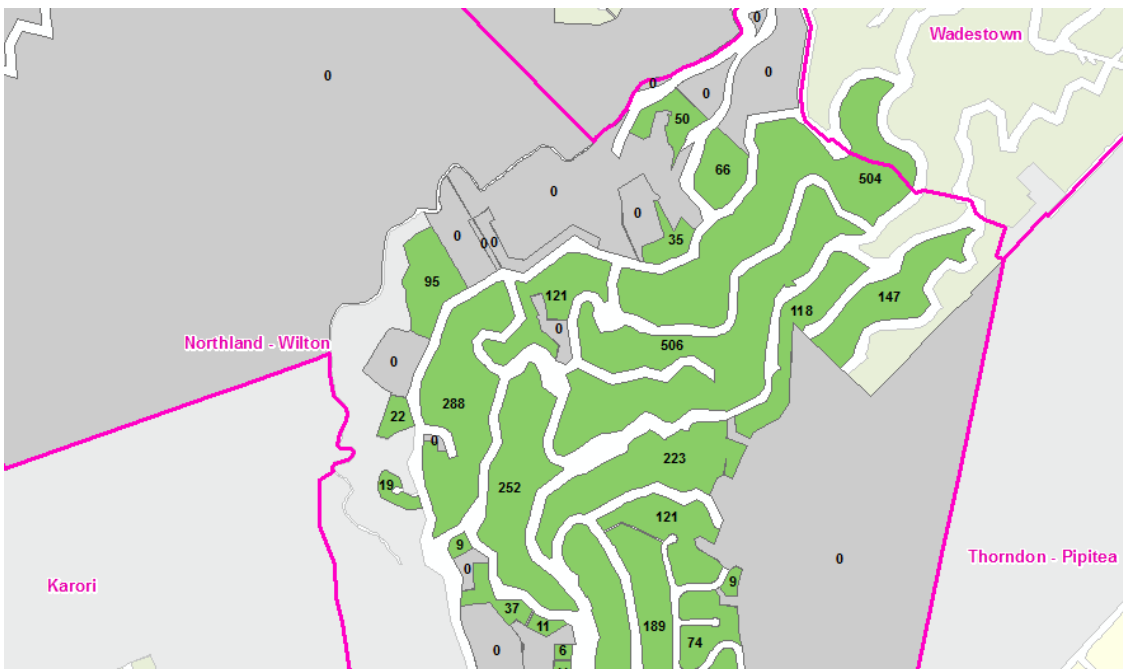
The methodology used to develop these scenarios can be summarised into the following 4 steps.

- 1 Application of existing population
- 2 Application of baseline development
- 3 Development of criteria for uplifting zoning
- 4 Calculation of estimated future population

### 1. Application of existing population

Existing population was applied at a block level using the ForecastID high population growth figures for 2018. The ForecastID data summarised population numbers by suburb, therefore to apply population to blocks, the suburb total was pro-rated against area for each residential block in a suburb. 'Non-residential' blocks (zones rural, industrial precinct, business, airport, conservation and open space) from the current district plan did not get a population assigned. More information on the ForecastID methodology used to develop these numbers can be found [here](#).

An example is included below for Northland/Wilton, where the total population of 5,862 is distributed to blocks based on the area and zone type of the block (population labelled).



### 2. Application of baseline development

Baseline infill and redevelopment was applied to the scenarios using the residential capacity model developed by Wellington City Council in response to the NPS-UDC. This is a multi-step development feasibility model that assesses the city parcel by parcel. Each parcel is also compared for an infill development, if possible, but also a comprehensive redevelopment. And each parcel is also developed for a range of typologies, as appropriate according to the zoning, including standalone housing, terrace housing or an apartment.

The data was provided in a table identifying the number of potential new dwellings in each suburb by district plan zone and typology (standalone, terrace, apartment). This was converted to population using some assumptions on number of people per dwelling type. These are listed in Appendix B. In a similar fashion to the existing population, these 'realisable' population numbers were applied to each block by pro-rating the population against area in each suburb and district plan zone.

### 3. Development of criteria for uplifting zoning

Some high-level zoning categories were developed for the future scenarios. They are

- Low Density 1
- Low Density 2
- Medium Density 1
- Medium Density 2
- High Density 1
- Central Area

More information relating to these high-level zones and the assumptions surrounding them can be found in Appendix B.

The development of the criteria for assigning zones varied depending on the scenario. An overview of this criteria is included in the table below. In all scenarios 'non-residential' blocks (zones rural, industrial precinct, business, airport, conservation and open space) from the current district plan were not considered for rezoning.

Scenario		
2	Suburban Centres	Uplift was based on proximity to sub-regional, district and town centres from the current district plan. The distance from these centres was varied to incorporate the required population.
3	Centralisation	Uplift was focussed in the CBD and inner residential areas. Denser residential zones were added around Adelaide Road and in areas nearer to the current Central Area zone as well as a general increase in all inner residential areas.
4	Natural Hazard	Uplift was focussed away from areas at risk of natural hazards and towards town centres and high frequency bus routes. A heatmap was developed to categorise blocks numerically depending on the risk and opportunity. Blocks with a higher number were given a higher density while negative values remain unchanged (i.e. no growth distributed to these areas).
5	Greenfield	Uplift was focussed in existing, planned and new greenfield areas. Possible future greenfield areas were identified based on slope and proximity to existing traffic routes (both indicating where it would be easier and more cost efficient for development).

### 4. Calculation of estimated future population

Future population was estimated based on the new high-level zone applied and some dwelling per hectare density assumptions (listed in Appendix B). Where a scenario did not impact a block, the existing and baseline population was applied to indicate no change. For areas which were zoned as suburban centres

under the current district plan the estimated population (calculated by population per hectare) was reduced by 90% to accommodate for the fact that most suburban centre usage is commercial.

# B

Appendix B – Assumptions

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## Scenario wide

- Blocks were assigned to suburbs where more than 50% of the block was inside the suburb boundaries.
- Existing and baseline population was evenly distributed across all residential blocks, although in reality some parts of a suburb may be more densely populated than others.
- The following assumptions were used to allocate future population:

High Level Residential Zone	Typology	Dwellings per hectare	Population per dwelling
Low Density 1	Detached houses	12	2.8
Low Density 2	Small lots detached houses	20	2.8
Medium Density 1	Mix of detached and terraced houses	40	2.4
Medium Density 2	Mix of terraces houses and low-rise Apartments (up to 4 floors)	60	2.4
High Density 1	Mid-rise Apartments (up to 6 floors)	80	2.2
Central Area	Mix of Commercial and high-rise Apartments (15+ storeys)	115	2.2

## Baseline Scenario

- NPS UDC numbers were provided by suburb, district plan zone and broken out into number of dwellings in different typology types 'single house', 'terraced housing' and 'apartments'. These numbers were converted to population by using a population per dwelling of 2.8 for single houses, 2.4 for terraced houses and 2.2 for apartments.

## Suburban Centres Scenario

- Sub regional, town and district centres we considered in this scenario as per the WCC Centres hierarchy in the District Plan.
- Rezoning was applied according to the following table:

Centre Type	Buffer 1 50k: 100m 80k: 190m	Buffer 2 50k: 300m 80k: 600m
Town Centre	Medium Density 2	Medium Density 1
Sub-Regional Centre	Medium Density 2	Medium Density 1
District Centre	Medium Density 1	Low Density 2

- Blocks were considered where more than 50% of each block fell inside the buffer zones.

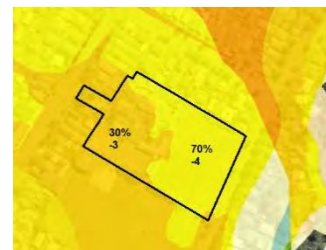
## Natural Hazard Scenario

- The following natural hazard layers were provided by WCC for use in this scenario
  - LIM potential flood hazards
  - Liquefaction potential

- Ground shaking hazard zones
- Tsunami evacuation areas
- Sea level rise (1.4m)
- To determine areas to uplift positive values were applied where blocks where they were within 320m of centre zones or 120m of a 'high frequency' bus route (1, 2, 3, 7, 21, 22). Blocks which were more than 50% inside these buffer zones were considered.
- The following table highlights the relative weighting given to each hazard/amenity:

Feature	Category	Hazard Weighting
Ground Shaking	Zone 1 (Low)	0
	Zone 2	-2
	Zone 3 (Moderate)	-3
	Zone 4	-4
	Zone 5 (High)	-5
Flood Hazard	Inside area	-2
Liquefaction	Low	-1
	Moderate	-2
	High	-3
	Very High	-4
Tsunami	Yellow zone	-1
	Orange zone	-2
	Red zone	-3
Sea level rise	Inside 1.4m rise	-2
High Frequency Bus route	Within 120m of route	1
Town centre, sub regional centre, district centre	Within 320m of centre	3

- Weightings were assigned to each block based on the hazard score which had the largest area. In the example the selected block received a score of -4, due to a greater proportion (70%) of the block falling into the -4 weighting.
- Each block was mapped to a high-level zone based on the following table. Note that the existing zone would remain if it was already zoned a higher density.



Hazard weighting	High Level Zone (50k)	High Level Zone (80k)
-15 to -1	Low Density 1	Low Density 1
0	Low Density 1	Low Density 2
1	Low Density 1	Medium Density 1
2	Low Density 1	Medium Density 1
3	Low Density 2	Medium Density 1
4	Low Density 2	Medium Density 2
5	Medium Density 1	Medium Density 2
6	Medium Density 1	Medium Density 2

## Greenfield Scenario

- Possible future greenfield sites were identified based on the slope table below:

Slope	Score/Class	Description
1°-31°	0	completely developable
31°-40°	0.5	semi-developable
40°-60°	0.75	mostly undevelopable
>60°	1	undevelopable

- Ohariu was selected as a possible greenfield site as it was the only viable rural area in the Wellington City region that had over 200ha of completely or semi undevelopable land, based on slope. Any significant natural areas, conservation zones were removed from the site.



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Our city is growing. The District Plan is up for review.

The decisions we make now will shape the way we live, for decades.

# What's your view?

[planningforgrowth.wellington.govt.nz](http://planningforgrowth.wellington.govt.nz)

Tō tātou taone  
*mō Apōpō*  
**E rautaki  
ana mātou**

Our City  
*Tomorrow*  
**Planning  
for Growth**

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



### **Te tino hiranga Why it matters**

Because we have a moment, right now, to make the changes we want. We live in one of the most liveable cities in the world! We cherish our edgy culture and beautiful heritage buildings. We love the blue harbour and green belt that frame our city. We are proud to have the lowest carbon emissions per capita in Australasia.

In the next 30 years Wellington will be home to 50,000 to 80,000 more people. That's going to have a big impact on our city. Not just where we live, but how we live, including where we work and do business. Technology is changing our lives, more people are looking for alternatives to the traditional three-bedroom house, and fewer people are thinking of cars as their main mode of transport.

The Council has a responsibility to ensure planning rules align with demand over the next 30 years, and to facilitate a diverse range of housing. As we plan for growth, we also need to think about how we make our communities safe from earthquakes and rising sea-levels, while holding on to those things we love.

This document asks you important questions about how you'd like Wellington to grow and develop. It has four scenarios, and we'd love to hear what you like, or don't like about each. Your feedback will help us create a 'spatial plan' which shows the future shape of our city, and that feeds into the District Plan review.

You've told us you want a city that is compact, greener, resilient, inclusive and connected, vibrant and prosperous.

This is our once in a generation chance to get things right. By taking part, you are helping us make the right decisions for our city tomorrow.

**Thank you!  
Ngā mihi!**



**There will be trade-offs**

Wellington's topography means there are restrictions to where the city can grow, and we know that people want our city kept compact, vibrant and accessible to all. It's nice to live near the central city, but that puts us closer to vulnerable coastlines and could change the character of our inner suburbs. Different options come with different price tags for supplying water and community facilities.



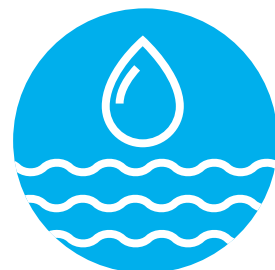
**Kei te ngaringari te taupori  
Our population is moving**

In the last decade most of the new apartments have gone into Te Aro, and there is room for more. These inner city suburbs are close to the heart, meaning that people are less reliant on cars. They also have a good share of our older homes, so we need to think about how building in these areas might change their character in the long-term, and whether this is something we want for the city. Or we could build new suburbs in rural areas, and that would mean more cars and travel, and being further from the heart of the city centre.



**Kei te nuku te ao  
The earth is moving**

In November 2016 Wellington was hit with a 7.8 magnitude earthquake centred off Kaikoura. In a civil emergency we need buildings that are strong, and places to gather that are safe. Resilience goes beyond buildings and roads. We need good food supplies, fresh water, and neighbours looking out for each other. For many, living out of town in a single-storey house feels safer than being in high-rise apartments.



**Kei te panuku te moana me te āhuarangi  
The sea and climate are moving**

Climate change has us thinking about where we should build, with sea-level rise and more frequent storm events becoming a reality. Our natural environment will help us cope if we look after it, and are careful about where and how we build. Heading to higher ground means moving away from the beach, and those spectacular coastal views, but brings more resilience to our future communities.

**Help us get things right for our city tomorrow**

Do we want family homes in the suburbs, or apartments on the bus route? Do we have more high-rise in the city or apartments around our suburban centres? Do we stretch into rural areas, or build new houses in our character suburbs?

**He aha ou whakaaro?  
What's your view?**

We have four scenarios to show the different ways we might grow. Each has its pros and cons, so talk to us about what you like and don't like about each. As well as these, we will have to consider the business and employment needs alongside residential growth. This is just a starting point, and a way for us to find out how people feel about the options and trade-offs.

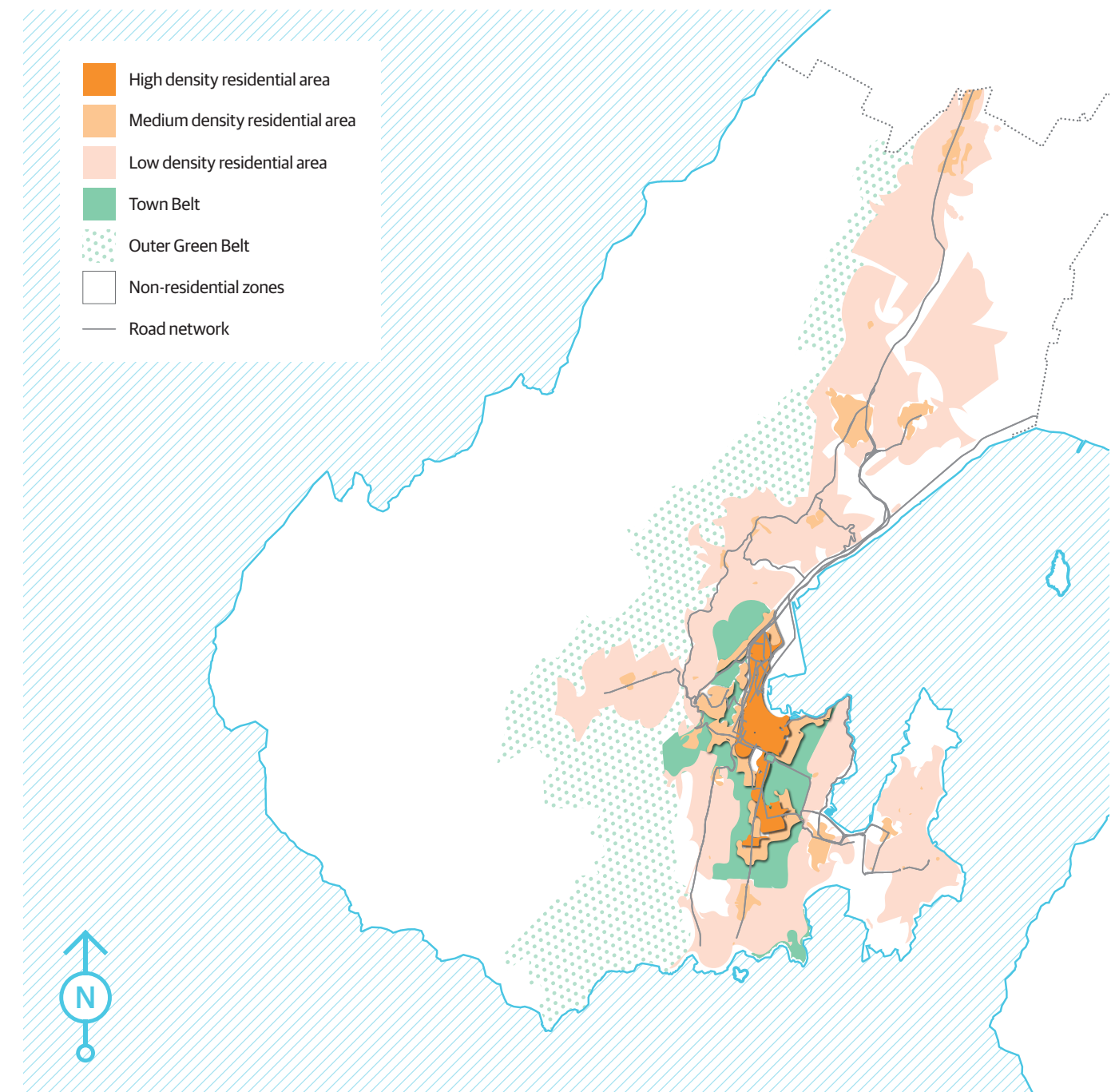


## Scenario one - Inner-city focus

This has most of the growth going to the inner city - Te Aro, Wellington central and parts of Pipitea, plus the inner suburbs of Mt Victoria, Thorndon, Aro Valley, Mt Cook, Newtown, and Berhampore. This scenario would see apartments up to 15 storeys high in the city centre, and low rise up to six storeys high along Adelaide Road, Newtown and Berhampore. We would also see more townhouse development in the inner-suburbs. The District Plan identifies parts of the inner suburbs as 'pre-1930 character areas', meaning that redevelopment of sites in these areas is discouraged. This scenario would remove the pre-1930 character protection in some areas.

### Things to think about

- More growth in the inner-city would help to keep our compact urban form.
- More people would live close to the waterfront and inner Town Belt.
- New development would potentially change the look and feel of the inner-city suburbs.
- Business would benefit from more people living close to shopping areas.
- We would need taller buildings and more investment in stormwater networks to manage natural hazards.
- More people can walk and there would be fewer cars on the road, reduced carbon emissions, and health benefits for people.
- We would need more play spaces and pocket parks.
- More people close to the centre works well with the transport options in Let's Get Wellington Moving.
- There will be smaller houses and less car parking on your property.



Scenario one would have most of the growth going to the inner city.



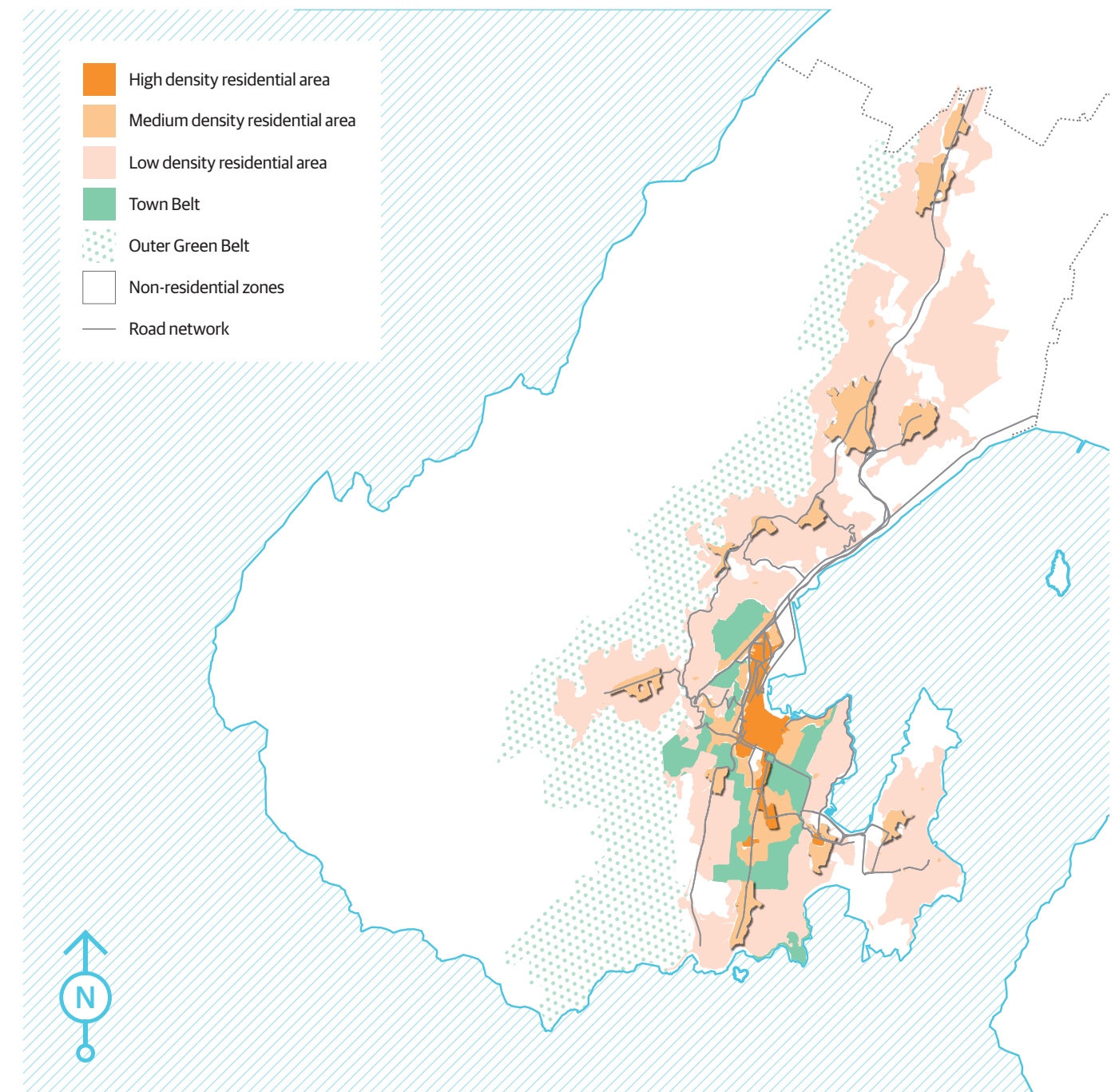
## Scenario two - Suburban centre focus

This would see more townhouses in most suburban centres. Apartments up to six storeys would be needed in Newtown, Berhampore, and around the Kilbirnie town-centre, in addition to apartments up to 15 storeys high in the central-city.

This scenario means new development goes mostly to areas that are less prone to sea-level rise and liquefaction, and it provides more housing choice across the city. Residential growth around suburban centres supports the economic viability of those areas, but we would have to invest in upgrading community facilities and infrastructure to support that growth. There would be some changes to pre-1930 character protection, although to a lesser degree than scenario one.

### Things to think about

- People would have good or improved access to public transport.
- New development in character areas might change their look and feel, but less so than scenario one.
- Investment in infrastructure would be needed to increase Kilbirnie and Miramar's resilience to sea-level rise.
- There would be a good mix of housing types across the city.
- Growth and new development would be directed to more resilient parts of the city.
- Vibrancy and commerce would be boosted in the suburban centres.
- We would need to significantly upgrade community facilities, and invest in water systems in the suburbs.
- There would be a need to improve public transport to and from the suburban centres that are further away from the central city.
- People would have lots of access to parks and open space.
- There would be smaller houses and less parking on your property.



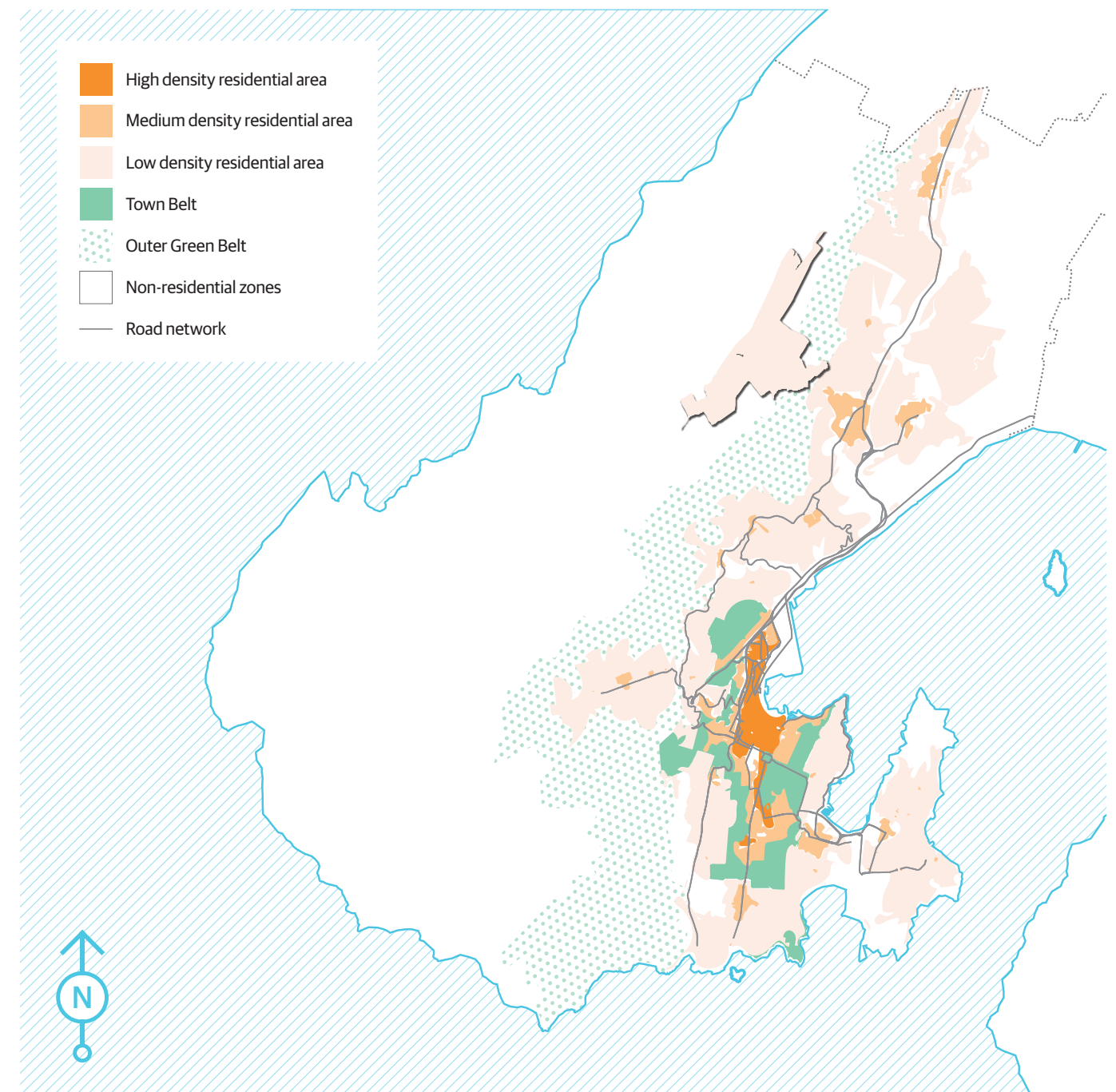
Scenario two would see more townhouses in most suburban centres.

## Scenarios three and four - New greenfield suburb and extensions

These scenarios look at areas that are currently undeveloped, and could be potential locations for new suburbs. These would be in addition to areas already marked for new development - Upper Stebbings Valley and Marshall Ridge, and Lincolnshire Farm near Tawa. These scenarios would still require a moderate amount of growth in the inner-city and some suburban centres.

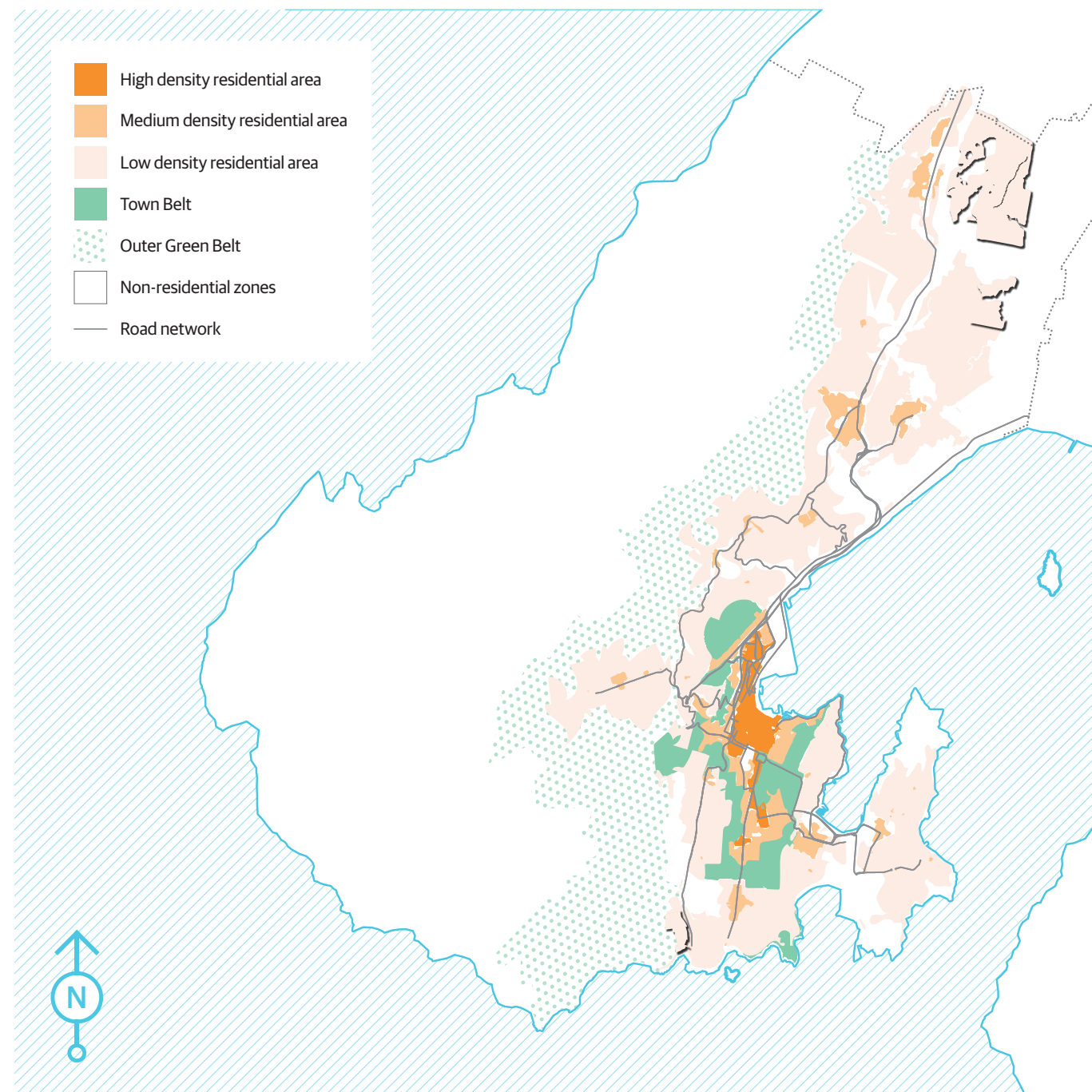
### Things to think about

- Northern and western areas are less affected by sea-level rise and liquefaction than coastal areas like Kilbirnie and Miramar.
- Takapu Valley and Horokiwi are close to centres with commercial and employment opportunities.
- Creating new communities can inspire modern and innovative design, for diversity and affordability.
- There would be less impact on pre-1930 character areas.
- There would be more cars on the road which would increase carbon emissions.
- Building new suburbs would mean a big investment in transport and water systems especially in scenario three.
- New development could impact the city's fresh water - we'd use water sensitive design methods to maintain water quality and reduce disruption.



## Scenario three - New greenfield suburb in Ohariu Valley

This features a single new suburb on rural land in Ohariu Valley. This area has been identified because it's flatter and has existing road access. A new suburb in this area could accommodate up to 11,500 people. A variety of housing types would be needed to accommodate this growth, including smaller sections than are currently being built in other new suburbs.



## Scenario four - Greenfield extensions

This features extensions into rural land adjacent to existing urban areas. Under this scenario, the growth area of Lincolnshire Farm would be extended into Horokiwi and Takapu Valley, and a rural hillside in Owhiro Bay would be rezoned to enable new housing.

### Timeline and next steps

- 8 April to 10 May 2019  
Kōrero with us about the scenarios.
- November 2019  
Your feedback is incorporated into a 'spatial plan' for you to tell us what you think.
- March/April 2020  
Councillors consider, and make decisions on the spatial plan.
- Late 2020  
Rules about where and how development can occur are written into a Draft District Plan. (Non-statutory consultation).
- Late 2021  
Proposed District Plan publicly notified. (Statutory consultation).

### Kōrero mai ki a mātou Talk to us

Use the submission form to tell us your view, or go to [planningforgrowth.wellington.govt.nz](http://planningforgrowth.wellington.govt.nz)



