

**Before the Independent Hearings Panel  
At Wellington City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** Hearing submissions and further submissions on the  
Proposed Wellington City District Plan

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**Statement of supplementary planning evidence of Kirdan Lees on behalf of  
Wellington City Council**

**Date: Friday 16 June, 2023**

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## **INTRODUCTION:**

1 My full name is Kirdan Ross Lees. I am employed as a Partner at Sense Partners, an economics and public policy consultancy based in Auckland and Wellington.

2 I have read the respective evidence of:

### **Kāinga Ora ID 391 & FS89**

- a. Michael Cullen for Kāinga Ora (Statement of supplementary evidence)
- b. Matt Heale for Kāinga Ora (Statement of supplementary evidence)

### **Stride Investment Ltd and Investore ID 470 & 405**

- a. Jarrod Thomson for Stride Investment Ltd (Statement of supplementary evidence)
- b. Timothy Heath for Stride Investment Ltd (Statement of supplementary evidence)

3 I have prepared this statement of evidence in response to expert evidence submitted by the people listed above to support the submissions and further submissions on the Proposed Wellington City District Plan (the Plan / PDP)

4 Specifically, this statement of evidence relates to matters raised in my statement of evidence.<sup>1</sup>

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<sup>1</sup> See <https://wellington.govt.nz/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/hearings-information/hearings-topics-and-schedule/hearing-stream-4>

## QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

- 5 My section 42A report sets out my qualifications and experience as an expert in planning.<sup>2</sup>
- 6 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

## SCOPE OF EVIDENCE

My statement of evidence addresses the expert evidence of those listed above.

## RESPONSES TO EXPERT EVIDENCE

**Kāinga Ora** ID 391 & FS89, Michael Cullen and Matt Heale

- 7 **Introduction of a town centre.** Michael Cullen and Matt Heale suggest introducing a town centre zone into the District Plan would better enable the city to grow in the future. This is one option for managing future growth.
- 8 Council proposes an alternative strategy with no town centre zone. Under this alternative strategy, future growth can be enabled and managed through altering height restrictions and other zoning restrictions through the Proposed District Plan.
- 9 My view is both strategies could be used to manage future growth.
- 10 I favour the strategy council propose – largely on grounds of simplicity: local zones tended to have similar provisions as town centres. Separate town centre regulations would require duplicating large amounts of content from local centres.

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<sup>2</sup> See <https://wellington.govt.nz/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/hearings-information/hearings-topics-and-schedule/hearing-stream-4>

11 I am also cognisant of infrastructure costs that are likely to limit the development of Karori as a town or future regional centre. I favour managing the other proposed areas as local zones rather than town centres.

**Stride Investment Ltd and Investore ID, Jarrod Thompson and Timothy Heath**

12 Jarrod Thompson and Timothy Heath raise the possibility of increasing heights in Johnsonville and test potential economic costs and benefits with extending permitted height controls in Johnsonville Metropolitan Centre Zone (MCZ) from 35 metres to 50 metres.

13 Tim Heath lays out a high-level identification of potential costs and benefits – one step required for any cost-benefit analysis. There may be other costs and benefits, such as the impact on sunlight, but the list is a reasonable first pass.

14 However, these are potential costs and benefits. On the balance of probabilities, benefits might outweigh costs. But knowing with any degree of surety requires quantifying these costs and benefits. A necessary step in cost-benefit analysis. This quantification of costs and benefits is needed to know if a 50m height limit is more appropriate than a 35m height limit.<sup>3</sup>

15 Tim Heath suggests a higher GFA (40,000 sqm) is appropriate for Johnsonville. I agree with enabling additional activity enabled by higher GFA caps. I agree with the council position of removing GFA caps within the MCZ entirely. In my view, spillovers are largely related to transport

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<sup>3</sup> The question of height limits for the MCZ are already addressed at page 60-66 of the MCZ S42A report (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/section-42a-reports/section-42a-report---part-2---metropolitan-centre-zone.pdf>) and regarding the City Outcomes Contribution at the end of section 8.10 of the Overview 42A report here: <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/section-42a-reports/section-42a---overview-and-general-matters-for-commercial-and-mixed-use-zones.pdf>.

that are appropriately managed by requirements in other parts of the District Plan.

- 16 Under the RMA, councils cannot have regard to trade competition – or its effects – in preparing District plans. A recent study by the Commerce Commission has highlighted a lack of competition in the grocery sector. One issue identified – among many issues in the study – is a lack of available sites for store development.
- 17 Against that background, it is likely framing the City Centre Zone Chapter as ensuing “viability”, that is, the ability to live or be sustained, of the City Centre Zone is no longer appropriate.
- 18 I support the council’s proposal to strike “viability” from the introduction to the City Centre Zone Chapter. The term “vibrancy” is sufficient to identify the purpose of the chapter in permitting and encouraging activity in the City Centre.<sup>4</sup>

**Date: Friday 16 June, 2023**

**Name: Dr Kirdan Lees**



**Position: Partner, Sense Partner**

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<sup>4</sup> The Section 42A report provided by council provides additional details on the City Centre Zone, see: <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/section-42a-reports/section-42a-report---part-1---city-centre-zone.pdf>

