

<p style="text-align: center;"><b>Wellington City District Plan – Omnibus Plan Change</b></p> <p style="text-align: center;"><b>MCZ-O3 – Amenity and Design</b></p>
<p><b>Scope of Proposed Change</b></p> <p>To amend MCZ-O3 (Amenity and Design) to achieve consistency across the Commercial and Mixed Use Zone chapters.</p>
<p><b>Background</b></p> <p>The 2024 District Plan enables significant increased development capacity within both the Commercial and Mixed Use Zones (CMUZ) and the residential zones that adjoin them.</p> <p>‘<i>Amenity and Design</i>’ objectives are included within the CMUZ chapters, seeking to facilitate high quality design outcomes that are not hampered by existing development patterns, particularly where there is lower density development in adjoining residential zones.</p> <p>Recognising that intensification, in particular with respect to building height and density, will occur both in the centres and around them establishes a framework for maximising the development potential of centres, as required by policy 3 of the NPS-UD.</p>
<p><b>Issue</b></p> <p>Planners in the Council’s Resource Consents Team have raised a concern that the Metropolitan Centre Zone (MZ) objective MCZ-O3 (Amenity and Design) is inconsistent with the equivalent Local Centre Zone (LCZ) and Neighbourhood Centre Zone (NCZ) objectives.</p> <p>MCZ-O3 is shown below (highlight added):</p> <p style="padding-left: 40px;"><i>Medium and high density mixed-use development is achieved that contributes to a good quality, well-functioning urban environment that reflects the changing urban form and amenity values of the Metropolitan Centres <b>Zone</b>.</i></p> <p>LCZ-O3 and NCZ-O3 (highlight added):</p> <p style="padding-left: 40px;"><i>Medium and high density mixed-use development is achieved that contributes to a good quality, well-functioning urban environment that reflects the changing urban form and amenity values of the Local / Neighbourhood Centres <b>and their surrounding residential areas</b>.</i></p> <p>As demonstrated above, the LCZ and NCZ objectives set an expectation that the urban form both in and around these zones will change as development capacity enabled by the 2024 District Plan is realised. There is no such expectation set for the MCZ despite that fact that these centres are second in the CMUZ hierarchy (after the City Centre Zone (CCZ)) and surrounded by land zoned High Density Residential Zone (HRZ).</p> <p>Across the suite of CMUZ ‘<i>Quality Development Outcomes</i>’ policies at CCZ-P9, MCZ-P7, LCZ-P7 and NCZ-P7 give effect to the ‘<i>Amenity and Design</i>’ objectives in the respective chapters. The policies require ‘<i>new development, and alterations and additions to existing development at a site scale, to positively contribute to the sense of place, quality and amenity of the Metropolitan Centre Zone</i>’ (or other zone) and set out a number of requirements for achieving this outcome. Of these matters, clause 2 is relevant to this issue.</p>

MCZ-P7.2.a is as follows (highlight added):

2. Recognising the benefits of well-designed, comprehensive, development, including the extent to which the development:
- Reflects the nature and scale of the development enabled within the zone and responds to the evolving, **more intensive identity of the centre;**
  - Optimises the development capacity of land, including sites that are large, narrow, vacant or ground level parking areas;
  - Provides for the increased levels of residential accommodation enabled in this zone;
  - Provides for a range of supporting business, open space and community facilities; and
  - Is accessible for emergency service vehicles;

It is noted that the equivalent CCZ, LCZ and NCZ policy clauses refer to the 'more intensive identity of the **neighbourhood**' and a separate recommendation through this plan change will be to amend the MCZ clause for alignment with the other CMUZ. The rationale for this change is provided in a separate assessment.

## Assessment of Options

### Relevant Options

There are two options to address this issue, being:

- Retain the existing provision (status quo); or
- Amend the objective to align with the equivalent LCZ and NCZ objectives. This amendment will also align the MCZ objective with the underlying policy clause MCZ-P7.2.a, subject to the clause being amended through this plan change.

### Cost/Benefit Assessment

The costs and benefits of the Amenity and Design objectives were assessed in the [section 32 report](#) for the CCZ<sup>1</sup>.

The costs and benefits of the two options for resolving the issue are detailed below.

Option 1: Status Quo	
Costs	Benefits
<i>Environmental</i> <ul style="list-style-type: none"><li>Failure to clearly recognise the broader intensification settings of the District Plan can hinder the necessary changes to the built form and scale of urban development. These changes, which occur both within the centres and around them over time, are essential to creating well-functioning urban environments.</li></ul> <i>Economic</i> <ul style="list-style-type: none"><li>Lack of consistency between the objective and the policy (recommended amendment) will create uncertainty as to how the provisions should be implemented. This will</li></ul>	<i>Environmental</i> <ul style="list-style-type: none"><li>There are no environmental benefits that have not been previously identified.</li></ul> <i>Economic</i> <ul style="list-style-type: none"><li>There are no economic benefits that have not been previously identified.</li></ul> <i>Social</i> <ul style="list-style-type: none"><li>There are no social benefits that have not been previously identified.</li></ul> <i>Cultural</i> <ul style="list-style-type: none"><li>There are no cultural benefits that have not been previously identified.</li></ul>

<sup>1</sup> Section 11.5

<p>result in increased economic costs preparing and assessing resource consent applications.</p> <ul style="list-style-type: none"> <li>Barriers to maximising the development of the MCZ will have implications for the economic viability of the MCZ.</li> </ul> <p><i>Social</i></p> <ul style="list-style-type: none"> <li>Unintended barriers to commercial and residential development in the MCZ will prevent access to housing and the level of services that a MCZ is expected to provide.</li> </ul> <p><i>Cultural</i></p> <ul style="list-style-type: none"> <li>There are no cultural costs that have not been previously identified.</li> </ul>	
<b>Option 2: Amend MCZ-O3 to align with LCZ-O3 and NCZ-O3</b>	
<p><b>Costs</b></p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> <li>There are no environmental costs other than those identified in the original section 32 report prepared for the CMUZ.</li> </ul> <p><i>Economic</i></p> <ul style="list-style-type: none"> <li>There are no economic costs that have not previously been identified.</li> </ul> <p><i>Social and Cultural</i></p> <ul style="list-style-type: none"> <li>There are no social or cultural costs that have not previously been identified.</li> </ul>	<p><b>Benefits</b></p> <p><i>Environmental</i></p> <ul style="list-style-type: none"> <li>The environmental benefit will be the realisation of development capacity enabled in the two MCZ, and resultant creation of well-functioning urban environments. The result will be centres and adjoining residential areas that are complementary in scale and achieve well-functioning urban environments.</li> </ul> <p><i>Economic</i></p> <ul style="list-style-type: none"> <li>Alignment between the MCZ objective and underlying policy will reduce costs associated with preparing and assessing resource consent applications, including with respect to urban design assessments.</li> <li>Additionally, alignment between the CMUZ chapters will assist to reduce these costs.</li> <li>Clearly expressing that the scale of built development both in and around the two MCZ will increase removes the expectation that existing levels of residential amenity will be maintained. This will assist to remove a potential unintended barrier at the resource consent stage and reduce costs associated with the assessment of an application.</li> </ul> <p><i>Social and Cultural</i></p> <ul style="list-style-type: none"> <li>Recognising that the scale of built development both in and around the two MCZ will increase will remove a potential unintended barrier to the realisation of additional building height within these centres and the development of new housing.</li> <li>Requiring high quality design and amenity outcomes will benefit the occupants of both MCZ, and the adjoining residents who use the services that these centres provide.</li> </ul>

### *Effectiveness and efficiency*

Amending MCZ-O3 is considered to improve the effectiveness of how the objective is applied. The proposed change seeks to appropriately recognise that the 2024 District Plan enables significant built development both the centres and residential zones that surround them. The change clarifies that existing levels of residential amenity will not be a barrier to increased built development in the MCZ.

Alignment with the equivalent LCZ and NCZ objectives will result in efficiencies for developers seeking resource consent for development in the MCZ.

### *Overall evaluation of Issue*

When considering the suite of Amenity and Design objectives (CCZ-O5, MCZ-O3, LCZ-O3 and NCZ-O3), it is evident that the omission of the reference to '*and their surrounding residential areas*' creates an inconsistency within the CMUZ chapters.

In the context of the NPS-UD (notably policy 6) and strategic direction of the District Plan, the proposed amendment to MCZ-O3 will both clarify how the objective is to be applied, and achieve consistency with LCZ-O3, NCZ-O2 and the equivalent clause at CCZ-O5.4.

Therefore, Option 2 is the recommended option.

### **Risk of acting/not acting**

There is sufficient information to analyse the appropriateness of acting or not acting.

Not amending the objective for alignment with the equivalent CMUZ objectives will retain an inconsistency between the chapters. It would be inappropriate not to create alignment when there is no identifiable reason why the objectives might differ.

### **Consultation**

This change has been discussed with the Council's Resource Consent Team, who support the change.

No further consultation has been undertaken.

### **Recommendation**

That MCZ-O3 (Amenity and Design) is amended as shown below:

*Medium and high density mixed-use development is achieved that contributes to a good quality, well-functioning urban environment that reflects the changing urban form and amenity values of the Metropolitan Centres ~~Zone~~ and their surrounding residential areas.*

### **Consequential Amendments**

It is also recommended that MCZ-P7.2.a is amended. This change is addressed separately.

There are no other consequential amendments required elsewhere in the District Plan.