



Global Research
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Draft Wellington District Plan Public Consultation

Full consultation analysis

February 2022

Prepared by Global Research Ltd
for

Absolutely Positively
Wellington City Council

wellington.govt.nz

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Introduction

Draft District Plan engagement background

The Draft District Plan (The Plan) is the Wellington City's first fully revised planning rulebook in more than 20 years.

The plan deals with the major planning and environmental issues facing the city – including housing supply choice and affordability, protecting biodiversity, integrating growth and infrastructure, responding to climate change and managing the risk of natural hazards.

Consultation on the Draft District Plan opened on 2 November, 2021 and closed on 14 December, 2021. This report is a synthesis of the feedback received on The Plan. The submissions were received via two main sources:

- The ePlan — an online District Plan submission tool which enabled submitters to comment on specific provisions on The Plan or generally.
- Free form submissions, which submitters provided in their own formats, such as letters or longer documents.

About the submissions

- **1034** individuals and groups provided submissions through the Wellington City Council's engagement portal.
- Submitters were able to provide multiple submissions resulting in **2423** submissions being received through the portal. The breakdown of submissions across the four parts were:
 - **846** submissions were received on Part 1 of The Plan.
 - **805** submissions were received on Part 2 of The Plan.
 - **555** submissions were received on Part 3 of The Plan.
 - **217** submissions were received on Part 4 of The Plan.
- Submissions were categorised into individuals, organisations, government and local government, overall:
 - Individuals provided 56% of submissions
 - Organisations provided 23% of submissions
 - Local Government provided 19% of submissions
 - Government Departments provided 2% of submissions
- **35** longer free-form submissions were received from 29 organisations and 6 individuals.

How analysis was completed

Qualitative analysis was completed to synthesise the comments made in all the submissions received and presented in the body of this report. This overall analysis complements the work of Wellington City Council Officers who have read and assessed each submission individually.

All comments were read by Global Research analysts and analysed dependent on the number of comments received on a particular section, sub-section or provision of The Plan. When only a small

number of comments were received on a particular part of The Plan they were read and synthesised in the discussion contained in the body of the report. When more than a few comments were received on a particular part of The Plan, comments were read by analysts and organised (coded) into themes and topics, assisted by specialist qualitative analysis software, and synthesis summaries were written.

Many of the submissions received on Part 1 of The Plan were general in nature and covered multiple topics. These submissions were analysed as one group no matter which section or subsection the submission commented on. The points made in these submissions are presented in the section Discussion of Strategic Comments, from page 9. The topics that this discussion was divided into were structured by sections of The Plan and content of the submissions received. There were also some sections of Part 1 which received submissions focused on particular sections, for example, 'Interpretation', and these submissions were analysed under those topics.

The submissions received on Parts 2, 3 and 4 of The Plan were made on particular sections, subsections or provisions and these have been analysed under those particular topics. Where no submissions were received on a particular aspect of the plan it has been noted in the report under the particular heading. The thirty-five longer submissions that were received have been summarised in the final section of this report.

Report structure

Following this introduction, the report is divided into four sections, one for each part of The Plan.

Throughout the report, the total number of comments on particular sections, subsections or provisions or themes (in Part 1), has been stated in each heading. The total number of comments made on particular topics are included in brackets next to topic titles to provide a guide for the number of comments made on particular topics. Within the discussion, the number of points made on particular sub-topics has been consistently represented by the amounts described below:

- > A very large number: 150+ comments
- > A large number: 100 – 149 comments
- > A sizeable number: 75 – 99 comments
- > A substantial number: 50 – 74 comments
- > A considerable number: 25 – 49 comments
- > A moderate number: 15 – 24 comments
- > Several comments: 8 – 14 comments
- > A small number: 4 – 7 comments
- > A few: 3 comments
- > A couple: 2 comments

The following descriptions were also used to describe the number of points made: one quarter, one third, half, two thirds, three quarters, and lastly, all of the comments.

Note that the amounts of comments made have been included to make it possible to understand the relative level of interest shown by respondents in particular topics. Particularly in Part 1, the number of comments shouldn't be interpreted as exact, as the 'coding' of comments involves analysts making thousands of judgements on what topics individual points should be coded to; the amounts would change slightly if different interpretations were made. For this reason, the numbers should be considered as good indications of the weight of different opinions on topics, and not an absolute number. This is the nature of all qualitative analysis of this type. In Parts 2-4, the number of comments is the number of submission points received on particular sections, sub-sections and provisions.

Direct quotes from respondents are presented throughout the report to illustrate particular points made. Quotes are italicised and indented from the margin. Spelling mistakes and grammar are only corrected where meaning would otherwise be unclear.

Some submitters chose to submit via organised groups such as the 'A City for People' website where respondents selected from a broad range of points. Some submitters selected every point made and others a significant number. Around 210 submissions were received in this way. Where submissions came from this source, or another similar one, such as Live Wellington, this has been noted in the discussion.

Part 1 Introduction and General Provisions

About the submissions on Part 1

- Eight hundred and forty-six submissions were received on Part 1 of The Plan.
- Respondents could provide more than one submission, which resulted in submissions being received from 662 submitters: individuals (611), organisations (47), government (2) or local government (2) submitters.
 - The 611 individuals provided 701 submissions
 - The 47 organisations provided 107 submissions
 - The 2 government departments provided 20 submissions
 - The 2 local government organisations provided 18 submissions
- The submitters who commented on Part 1 often selected a section in the first part of the engagement document and wrote a submission which discussed multiple topics. Frequently there was not a precise relationship between the particular section and the submission as the submitter commented on a range of topics. Because of this, all of these submissions were analysed in one section which covered all of the topics discussed by submitters. The sections that these submissions came from, and amounts were:
 - Introduction
 - General: 2 submissions
 - Contents: 19 submissions
 - Purpose: 4 submissions
 - Description of the District: 1 submission
 - How the Plan works
 - General: 41 submissions
 - General Approach: 574 submissions
 - Statutory context: 1 comment
 - Relationship with other planning documents and policies: 2 comments
 - Local level: 1 comment
 - General approach: 97 comments
 - General: 1 comment
 - District Plan Framework: 9 comments
 - Using the District Plan: 3 comments
 - Notification: 2 comments
- The discussion that follows is organised generally to follow the order of Part 1 of The Plan.
- Where specific sections had comments made on them which were consistent to that section, these have been included under those section headings, such as Term Definitions.
- Where no submissions were received on a particular section or sub-section this has been identified at the end of this section.

Discussion of Strategic Comments

How The Plan Works

250 comments

Summary

The National Policy Statement on Urban Development (NPS-UD) was cited in 250 submissions. Around 200 of these submissions received via the City of People submission form supported The Plan's compliance with the NPS-UD, however, a considerable number objected to the NPS-UD itself or of the way it had been interpreted and applied to the city.

National Policy Statement on Urban Development

250 comments

Approximately 200 pro-forma submissions received through A City for People supported The Plan's compliance with the government's Resource Management Act 1991 Amendment Bill and 'height-to-boundary standards to 4+ storey multi-unit housing'. These submitters further agreed with the removal of the maximum height limits in Wellington's City Centre Zone, seeing the NPS-UD as enabling 'more housing in a compact city centre'.

Several other submitters supported the NPS-UD and half of those stated general support for its implementation through The Plan, while the other half supported the removal of the height limit in the City Centre Zone.

A considerable number of submissions opposed the National Policy Statement on Urban Development (NPS-UD) and a good two thirds of those argued that specific areas or suburbs would not need to be included in the high-density zone to comply with the NPS-UD. Areas mentioned were Hobson Precinct, and Lower Kelburn and Thorndon to protect heritage. Additionally, Hay Street, Selwyn Terrace, Johnsonville Train line, Mt Cook, and Newtown were mentioned in relation to suggested alternatives or objections to the NPS-UD zoning. A few submitters stated their support for the Spatial Plan's approach and cited the Boffa Miskell report, while a further few rejected the NPS-UD based on Wellington's unsuitable topography. Remaining submissions made individual comments about their opposition to the NPS-UD.

A small number of submitters noted The Plan does not meet NPS-UD requirements, with half of those commenting on specific Plan provisions. The remaining submitters criticised what they saw as the chasm between the Spatial Plan and proposed District Plan in regard to intensification.

The remaining small number of submissions discussed various topics relating to The Plan and NPS-UD.

Summary

A substantial number of submitters made points relating to tangata whenua and the rights and needs of this group regarding decision-making that impacts the land and its uses. Common themes within comments were acknowledgement of traditional ownership and guardianship, and expectations that WCC adequately include tangata whenua in decision-making.

In this vein, the Treaty of Waitangi was referenced, alongside calls for WCC to be proactive in fostering effective and respectful relationships with tangata whenua.

Submissions relating to tangata whenua covered a range of different topics.

Several submitters wanted to see more recognition and protection of Māori heritage and acknowledgement of the relationship of Māori with ancestral lands. A small number of these submissions also noted that viewshafts of significance to mana whenua should be retained.

Several additional submitters referred to Te Tiriti o Waitangi, either expressing a desire for Te Tiriti to be upheld and placed at the core of planning, or expressing support for the Plan as it “shows signs of moving us towards a more sustainable, modern, Te Tiriti-o-Waitangi compliant future”.

Several submissions concerns about the implications of new SNAs on mana whenua and their right to care for and make decisions about land. A few submissions argued that WCC must retain the current mana whenua chapter as a minimum, while a few others made calls for more initiatives such as education or having more mana whenua-led developments.

A small number of submitters commented specifically that they wished to see more active engagement of tangata whenua in decision-making processes around Wellington’s future. These submissions emphasised the importance of listening to the voices of tangata whenua and ensuring that they are consulted and involved in making decisions, particularly those relating to land use.

We would like to see a stronger participation of Māori in discussions relating to land use and practices, and for Māori aspirations regarding the development and urban design of Wellington to be respected and incorporated. The Māori voice is critical to any decision-making regarding land use and development practices, particularly in relation to resource management discussions. Without the active participation of mana whenua, these decisions can directly contravene the kaitiakitanga of tangata whenua, and their ability to carry out customary activities. Equally, provisions must be amended and strengthened to ensure Māori heritage sites are protected.

A small number of submitters simply offered support for the inclusion of a tangata whenua section in the District Plan. A couple of these submitters noted that while they support the inclusion of this section, they also felt that The Plan should acknowledge Wellington’s increasingly diverse and multi-cultural population in a wider context as well. Another few submitters noted specifically that they wished to see more partnership with iwi or the development of an advisory board to be part of the District Plan going forward or wanted greater recognition of mana whenua.

Two submissions expressed concern that the reflection of “tangata whenua culture and traditions within urban design and development” sounds “empty” and could be construed as virtue signalling.

Other points made in submissions included a call to build a city marae, concerns about more land being taken from Māori, and one submitter who argued that The Plan is an opportunity for further reconciliation, stating:

I see the District Plan as a real opportunity to respect and support the tino rangatiratanga of mana whenua by supporting and facilitating the return of their stolen lands and their rights to care for and make decisions for those lands and its resources. I strongly support enabling the full potential of the Spatial Plan in this District Plan. I believe the District Plan must enable a diverse and varied range of housing choices in all residential zones, including papakāinga, co-housing, perimeter block housing, and more.

Strategic Issues

1,300 comments

Summary

A large number of submitters lauded the housing objectives of The Plan but reiterated that more – and more affordable – housing is needed. Relatedly, the motives of developers were called into question here, with a large number of submitters urging that WCC neither rely on nor trust in their ability to provide affordable and robust housing. Submitters contended that developers are profit-driven rather than community-outcomes driven.

The strategic direction of The Plan was called upon to be reoriented so that the needs of various groups are better considered and to better face a changing climate. This was largely residents of or communities within Wellington, but also cohorts within society such as LGBTI+ and youth.

A substantial number of submitters wanted to see community-focused outcomes, that is, provision of community places and spaces in an intensified city. A similar number of submitters to this section of The Plan supported the idea of a circular economy and a similar number again wanted to see planning account for the importance of visual amenity to city living.

Lastly, the issue of assisted housing (or inclusionary zoning) was supported, mainly based on the understanding that this would result in greater stocks of affordable housing. There was, however, scepticism around whether or not this would be the outcome.

Housing needs

300 comments

A large number of submissions were received in which affordable housing was either supported or called for. This included broad discussion on the need for more housing in Wellington, more affordable housing in Wellington, and, that different types of housing are required to suit a variety of household needs.

A large proportion (200) were comments from the A City for People pro-forma submission, and reiterated the need for safe and affordable housing suitable for singles, couples, small and large families of all ages:

I believe the District Plan must enable a diverse and varied range of housing choices in all residential zones, including papakāinga, co-housing, perimeter block housing, and more.

Of these pro-forma submissions, 20 contained additional points stating that the District Plan provides an opportunity to improve housing for the rainbow community who currently face more difficulties or discrimination in housing. Increased provision of good-quality, safe housing, sufficient housing density, public spaces and other public amenities would combat many of the challenges the rainbow community faces.

Most significantly, LGBTQI+ people face much higher rates of homelessness, unsafe housing or unstable living situations. The housing and rental crisis has exacerbated these challenges, whereby rainbow tenants can be discriminated against in a more competitive and costly housing market. This is significantly more acute for the transgender population, who experience a much higher rate of homelessness and housing instability compared with the rest of the population.

One tranche of comments specifically noted the impact that developers have on housing supply and wanted to see outcomes for people given prominence over developers in decision-making. Housing affordability was deemed a crucial aspect of planning and vital if the city is to remain a viable option for long-term residency.

Economy

260 comments

A very large number of submitters supported the concept of a circular economy, often in the context of broader concerns about climate change and sustainability. About 200 were pro-forma submissions from A City for People, which stated:

It is important to have multifunctional community spaces within centres as Climate Action Hubs to support the circular economy, provide space for innovation, education and behaviour change and create a tangible vision of a low carbon future. I support circular economy principles being integrated into the district plan so that waste is minimised and designed out of construction projects, and that resource recovery infrastructure is put in place to manage any remaining waste.

A small number of submitters called for support for diverse and robust local economies (as opposed to dependence on global economies).

Strategic objectives

130 comments

A large number of submissions included requests that the strategic objectives be reoriented to better suit the needs and outcomes of certain groups, such as Wellington residents, communities more broadly, or other segments of society.

A moderate number of submitters called for the reorientation of the strategic direction so that it is more in line with their own priorities (such as improving outcomes for Māori, LGBTQI+ communities, youth, or to combat climate change). This included about 200 pro-forma submissions by A City for People who wanted to see inclusivity prioritised, e.g., for LGBTQI+ communities.

Note there were a sizeable number of comments from the Live Wellington pro-forma submission in which the following aspects were called for in the strategic direction of The Plan: participatory decision-making, better reflection of the impact that urban form has on liveability; and the following:

The detailed provisions of the District Plan need to be more rigorously tested against the objectives to ensure that the Council's chosen methods are the best options to deliver on the objectives of the Plan.

Planning approach

110 comments

Submissions received about planning approaches driven by market forces were mostly in relation to housing and the perception that developers are not incentivised by positive public outcomes, but rather are motivated by profit. There was scepticism about developer- and investor-led intensification, with submitters questioning whether The Plan is biased towards these groups' interests.

Submitters claimed that developers cannot cater to the needs of Wellington residents and several claimed that the Council's trust in developers to enact The Plan's intended purpose was misguided.

Contrary to the stated outcomes for developers, the District Plan will introduce perverse incentives for developers to construct new buildings at the expense of current residents and ratepayers

In the current de-regulated plan, the first areas for intensified new building will be decided by developers in their own interests and for the highest profit.

Developers will not 'do the right thing' without good regulation.

There were a moderate number of additional submitters who advocated for Council to work *with* developers (alongside other entities) to ensure that appropriate intensification occurs.

Local government, central government agencies, private developers, and communities need to work in partnership not as adversaries.

A small number of submitters called for independent input into The Plan, both for urban design input and for an assessment of the whole Draft Plan.

Community outcomes and development 65 comments

A substantial number of submitters expressed support for strategic attention to community outcomes and development objectives. Submitters wanted to see Wellington as a place for people, and a place where people and their community-building aims are valued and supported both by physical aspects (such as having pleasant places to gather) and less tangible aspects (such as that people are friendly and supportive and are treated with respect).

A large proportion of the submissions were pro-forma, and included the following sentence:

I support the new bicycle and micro-mobility device parking requirements for commercial and community facilities in the Centres and Mixed Use zones.

Community cohesion and general harmony was the perceived outcome of strategic planning that addressed these issues.

Overall city feel and design 200 comments

A considerable number of submissions noted that visual amenity needs to be prioritised in strategic planning, and that this aspect of city life is a major component of a thriving city. People wanted to see attractive streetscapes and urban design that is people-centred and which increases liveability.

Around 200 comments were from a pro-forma submission by A City for People.

Assisted housing (inclusionary zoning) 225 comments

Developer exemptions to build higher if providing lower cost housing was supported by a considerable number of submitters as its outcomes were perceived to increase housing affordability and availability. A large proportion of submitters used the phrase “inclusionary zoning” in reference to this concept.

About 200 submissions were pro-forma, from A City for People, and expressed a preference for AH-P (*Assisted Housing – Policies*) Option 3 while offering broad support for AH-P P (*Assisted Housing – Policies*) Options 1, 2, and 3 (Enable assisted housing; Contribution from over-height development; and Contribution from 3+ unit developments). The A City for People pro-forma submission was worded as follows:

I support options 1, 2, and 3 of the inclusionary zoning proposals, as these options are sure to increase the supply of affordable and social housing, and I prefer option 3 to option 2 as it provides better flexibility and can raise revenue for social housing provision.

A small number of submitters supported the inclusion of Assisted Housing in The Plan without selecting a preferred option, while a few submitters stated their support for AH-P Option 3 (Contribution from 3+ unit developments).

A moderate number of submitters made strong arguments against allowing developers to build higher for providing lower cost housing. This was based on the view that developers could easily abuse the exemption to maximise profit.

Developers should not be allowed to abuse the "height exemptions" under the plea of providing loosely defined "assisted housing".

(Note: see 'Planning approach' below for additional comments about developers and a market-led approach to intensification.)

Roading and Transport

1,050 comments

Summary

A very large number of submissions received discussed roading and transport-related topics and almost half of those commented on public transport. A good fifth of all submissions supported that proposed intensification should be located near public transport. Three other topics which each gathered a sizeable number of submissions were cycling, car parking, and private vehicles. The Plan's approach to cycling and private vehicles was mostly supported by submitters, however, losing car parking spaces was a more contentious topic. Pedestrianisation in Wellington was mostly well received by a substantial number of submitters.

Cycling

250 comments

A very large number of submissions made cycling related comments. Out of those, four fifth supported cycling and the majority of those supportive comments were submitted through A City for People. This group supported cycling as a 'low-carbon' transport option in 'healthy, quiet, equitable streets in a thriving city'. The remaining several supportive comments either simply supported cycling, wanted more cycle lanes or cycleways, the removal of barriers for cycling, a well-connected and safe bike network, or bike parking. It was also noted that the variety of micro-mobility modes is on the uptake and will need to be considered in the design and construction of new cycle lanes and cycleways. It was noted by a small number of submitters that cycling is not only a low-carbon option but has health physical and mental benefits.

A moderate number of submitters commented on parking for bicycles and micro transport, and about half those submitters supported the proposed designated parking near commercial and community sites in City Centre and Mixed Use Zones. Other submissions proposed mandatory minimum bike parking spaces in multi-unit developments, lockable and weather-proof shelters for bikes, and a small number argued that parking facilities need to be available 'everywhere' in order to promote active transport.

Several submitters opposed plans for more cycleways and cycle lanes for a variety of reasons. A few submitters stated some Wellington locations or roads are unsuitable for cycling and a further few opposed argued cycle lanes take up much needed street parking for cars. One example location mentioned was the proposed cycleway and light rail track along Rintoul Street, Luxford Street and Adelaide Road. A final few submissions argued money spent on bike lanes should be invested into other projects used by larger proportion of Wellingtonians.

The small number of remaining comments highlighted two relevant topics. Firstly, the need for disability parking must be provided for, and secondly, it was noted pedestrians crossing cycle lanes on their way to bus or light rail platforms creates safety concerns, especially for slower walkers.

Pedestrian

250 comments

A very large number of submissions discussed walkability in Wellington. Of those, close to two thirds supported walkability and pedestrianisation of the city and these comments covered a wide range of

topics. About 200 of pro-forma submissions supported A City for People and argued housing densification will require accompanying creation of pedestrian amenities

Several themes emerged, with the most represented theme spoken about by several (11) submitters focusing on the link between a pedestrian-friendly environment and new housing developments. A small number supported Parent for Aotearoa submission and 15-minute neighbourhoods.

The next most frequently discussed theme addressed the pedestrian environment and considered features to make this inviting and safe. Suggestions included the relationship between a multi-storey's ground floor and streetscape, requiring city centre buildings to have verandahs for pedestrian shelter and protection, or adding interest to the walking experience along safe laneways through commercial and mixed used zones.

Safety for pedestrians was mentioned in a few comments and frequently referred to creating a walking experience which is visibly connected to activities within neighbouring buildings and its environment. Two submitters supported The Plan's provisions for walking and walkability or the approach to align high-density developments along main transport routes and walkable neighbourhoods. Another two stated they like the walkability with its unique geographic and cultural character of the city. Two further submissions suggested incentives to encourage walking, and the remaining small number of submitters made varying individual comments.

Several submitters commented on other varied issues specific to pedestrians. A few of those expressed concern people with disabilities would be left behind as The Plan does not consider their circumstances and needs in the design of walking catchments or cycle lanes. Two submitters discussed the practical implications of 20-minute walking catchments and suggested this should be lowered as slow crossings or other barriers will extend this to a longer walk than stated. Two submitters made the point that tall buildings and narrow dark streets make uninviting and unsafe walking environments, and one of those submitters referred to Crime Prevention through Environmental Design (CPTED).

One submission articulated the link between walking and community and its relevance to proposed intensification. While the submitter specifically related the argument to the LGBTI+ community, this also applies to the general population:

This housing densification needs to be supported by amenities to support walking catchment, which will make it easier to build communities, and for those communities to access the goods and services they need.

The remaining small number of submissions made comments on a range of individual topics.

Private Vehicles

75 comments

A substantial number of submissions discussed the use of private vehicles in Wellington. Of those, a considerable number supported measures to reduce vehicles on roads, especially in the CBD, and encourage the use of active or public transport.

Generally, submitters expressed a desire to prioritise people over vehicles. Suggestions to achieve this included: penalties for large vehicles via a congestion charge, blocking selected CBD streets to vehicles, or reducing the number of vehicles per household over a period of time. Suggestions which supported low-emissions transport options included: car-free Fridays, free public transport city or region-wide; or car-share schemes especially in high density areas. A small number of those submitters noted that with the proposed intensification the demand and need for safe and functional pedestrian, cycle and other micro transport networks becomes not only essential but also the way for the future.

Of the submissions which supported reduction of private vehicles, several specifically advocated for sustainable transport option. Most of these comments included a reference to reduce carbon emissions to limit climate change. Biking and sufficient bike parking (including for cargo bikes) around Wellington

and as part of new apartment developments was commented on by a small number of submitters. A second small number of submissions argued more urgency should be given to the introduction of low carbon transport and the roll out of active and green transport networks. Two examples of this were:

Actively pursuing a vision of the future of the city can add purpose to this section.

The 'Sustainable Transport Hierarchy' – "must be rolled out with ambition and retrospection not just with future developments.

A few submitters commented Wellington's liveability would be enhanced if active transport was planned and executed with Universal Design principles.

A moderate number of submitters talked about difficulty navigating private vehicles on Wellington roads. The most frequent comment reported roads are narrow and parked up with private vehicles which makes driving difficult and at time impossible to navigate for buses and emergency vehicles. On some roads cars are illegally parked on footpaths to allow moving vehicles to pass on the road. Generally, it was felt proposed large residential developments in areas with already congested roads were unwise and would not only worsen congestion but increase safety issues as well. Hay Street was commented on several times, and other streets mentioned included Telford Terrace, Colway Street, Aro Street, and Moir Street. Several submissions opposed The Plan's Sustainable Transport Hierarchy and argued private vehicles are necessary or a right. Submitters argued that residents in outer suburbs and with children will continue to own and use private transport, that unreliable public transport makes people use private vehicles instead, and suggested potential residents in the proposed apartment developments will also own cars regardless of no off-street parking provided. The need to provide disability parking space for residents along roads with proposed cycleways or light rail was stressed by one submitter.

Several submitters made comments relating to other matters around private vehicle transportation. A small number of submissions commented on public transport shortcomings which leads to residents to opt for private vehicle use. Two submitters stated cycling and car ownership are not mutually exclusive and therefore data from Let's Get Wellington Moving's cycle network consultation should be critically interpreted. Safety on and around roads was a concern in two submissions, especially about proposed housing developments and its accompanying pressure on roads and transport options.

Two final submissions argued for improved accessibility and both supported improved accessibility for people with disabilities. This included exemption for disability car access to a car-free CBD and consideration for elderly and disability car access and parking to pursue essentials such as appointments and shopping.

Public Transport

400 comments

Public transport and development

120 comments

A very large number of submissions discussed public transport in Wellington. Out of those, about half commented on public transport and development. Most supported high density being developed in areas with good public transport. Among those were two pro-forma submissions, one through Live Wellington and the second from Port Street, Earls Terrace, Stafford Street, and Mt Victoria Residents. These two submissions made up most submissions within the public transport and development theme and argued under-utilised land should be first in the sequence of development. A small number of submitters proposed a more nuanced approach should be employed to identify and plan for public transport and development. A few submissions included walking and cycling access next to public transport as an important factor for intensification locations.

A moderate number of submitters suggested locations which have public transport which can already service or can be expanded to service new housing developments. These were, from most frequently to least frequently mentioned: CBD, Taranaki Street, Adelaide Road, Cambridge Terrace, Kent Terrace, Te Aro

between Willis Street and Cambridge Terrace, Waterloo Quay, Aotea Quay, Featherston Street, Featherston Quay, Ohiro Road, both side of Darlington Road, upper Churton Park, Granada North, area around Wellington railway station and adjacent to Thorndon Quay and Wellington Port, and Tawa.

Support public transport

220 comments

A substantial number of submitters gave general support to public transport and about 200 of those submissions came from supporters of A City for People. This pro-forma submission stated their support for:

15-minute Neighbourhoods, Low Traffic Neighbourhoods and circular economy principles should be fully integrated into the District Plan to create a more liveability-focused and climate-focused built.

Several submitters supported improved public transport and of those a small number advocated for public and active transport to be accessible to people of all ages to move around their neighbourhood. Two submitters argued public transport should include natural areas and landscapes as destinations. Another two submissions supported Parents for Climate Aotearoa and wanted public transport, walking, and cycling alongside housing prioritised as a combined system. The Sustainable Transport Hierarchy was supported by a few submitters, and remaining submissions were individual comments on a range of public transport topics.

Johnsonville train line – rapid transit

25 comments

A moderate number of submissions discussed the Johnsonville train line and opposed The Plan classing it as Rapid Transit. Most argued that under National Policy Statement on Urban Development (NPS-UD) the existing Johnsonville train service does not qualify under the criteria and therefore WCC's proposed high-density residential developments within this catchment are invalid and should be abandoned. One example comment which outlines this argument reads as follows:

No assessment of the Johnsonville Railway Line against the NPS-UD definition and purposes for Rapid Transit has been undertaken in the One Network Framework, the Regional Land Transport Plan or the draft District Plan. There is no evidence supporting this designation.

The two remaining comments either agreed it was a Rapid Transit line or suggested the conversion of the train station to two platforms during peak hours.

Challenges with public transport implementation

10 comments

Several submissions discussed issues with current public transport or the proposed public transport systems in The Plan. A few submitters highlighted issues with the proposed increased use of public transport and additional residential developments. Already narrow and heavily parked-up roads would not be able to accommodate buses, which are already at or above capacity, and car parking near new public transport would still be required. Two submitters argued that the proposed transport network will not accommodate all journeys, especially across suburbs rather than into the centre of the city. Therefore residents will continue to have and use private vehicles as transport. Two submitters supported the proposed developments near existing public transport infrastructure and one submitter opposed the proposed light rail and cycleway along Rintoul St / Luxford St / Adelaide Road.

Critical of public transport

10 comments

Several submitters were critical of The Plan's approach to public transport and reduction in private vehicles, and these comments ranged widely in topic. Two submitters stated it was evident in The Plan that WCC staff were pressed for time after the government's Medium Density Residential Standards announcement and argued this could be approached better. Two other submitters noted the assumption residents would give up private vehicles in favour for public transport was misguided, pointing out:

The proposed mass rapid transit options are in fact corridors from the outer suburbs to Wellington central/the railway station – LGWM does not provide a network that allows people to move across the corridors from one suburb to another (such as movement from (say) Berhampore to (say) Kelburn)”

Two other submissions expressed stronger views on The Plan’s transport proposal. One felt younger and able-bodied people were favoured over families with young children or older and less mobile or fit persons who might find public and active transport more challenging for daily activities. The second objected to the placement of private vehicles at the bottom of The Plan’s Sustainable Transport Hierarchy and threatened that this will become an election issue. One other submitter noted the increase in working from home which will decrease the number of commuters into the City Centre. The remaining comments made individual points on a variety of topics.

Accessible public transport

5 comments

A small number of submitters highlighted that accessibility of public transport must be paramount to meet the needs of disabled, elderly and LGBTQI+ community members. Accessibility was identified as physical accessibility, frequency of services and feeling safe when using public transport. One submitter noted that pensioners and disabled people also rely on private vehicles to move around the city regardless of public transport services.

Other public transport comments

15 comments

A moderate number of submissions discussed other topics relating to public transport. A small number of comments proposed specific text amendments or changes to structure of WFZ – Special Purpose Waterfront Zone section. Two submitters proposed the rapid transit network could be developed in stages and in time with intensification developments going up. One submission from Greater Wellington Regional Council highlighted a difference in projection numbers between The Plan and other plans or projects. They stated the discrepancy is:

[A] difference between the housing capacity projections of Let’s Get Wellington Moving and Our City Tomorrow: He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City, along the Mass Rapid Transit spine. We note that there is an intention to update District Plan provisions to align with Let’s Get Wellington Moving at a later date. We expect the outcomes of ongoing conversations on future development capacity to be reflected in the District Plan as appropriate.

The remaining small number of submissions came from individual submitters and made separate points relating to public transport.

Parking

80 comments

Upzoning increases parking needs and creates congestion 20 comments

A sizeable number of submissions discussed topics related to parking, a quarter of which stated parking is already an issue and/or leads to congestion on streets. Of those, several submitters commented proposed apartment development will make existing parking issues worse and a small number reported that on-street parking on narrow streets means buses are already unable to pass, and this will worsen with the proposed intensification. Four submitters stated parking itself is already a problem, and a few submitters reported service vehicle parking on very steep streets is already an issue. A few submitters opposed developments on either Hania or Rintoul Streets due existing lack of parking, while Hay Street was noted as having escarpment stability issues. The remaining comments either opposed the proposed development in their area due to increasing parking issues or noted no parking for EV with chargers had been included in The Plan.

Support or retain parking

15 comments

A moderate number of submitters expressed concern about proposed removal of car parking, both on-street and on-site. Comments varied but generally argued that residents, especially households with children and in outer suburbs, will continue to own and use private vehicles and therefore car parking will still be required. Submitters contended that car parking spaces are needed and have to be provided for in The Plan, as removing parking provisions will cause more issues on streets and lead to worsening congestion issues. Two submitters argued the introduction of Let's Get Wellington Moving will automatically reduce or eliminate on-street parking along many routes. One submitter noted parking for tradespeople and service and emergency vehicles is required near new developments. The remaining submissions made individual points on a range of other parking topics.

Remove or oppose car parking

15 comments

Several submitters supported the reduction or removal of car parking spaces in The Plan, ranging from short expressions of support to longer discussions. Reasons for support included that open public or green spaces should have higher priority, on-street parking is not a right (except for those with disabilities), and maximisation of publicly owned land for public good, such as parks, housing, bike lanes, bus lanes, or pedestrian walkways.

Accessible parking

10 comments

Several submissions drew the attention to the requirement for disability parking spaces in Wellington. Half of those simply noted that disability parking is needed, while two submitters added elderly will also need car parking. Another two submitters suggested disabled car parking spaces should be located near all new apartment developments and one proposed ground level parking should only be allowed for disabled car parks.

Cost of parking

3 comments

A few submitters commented on the cost of car parking and each expressed a different view. One lamented the cost of resident parking permits, another suggested on-street parking should be charged at market rate, and a third argued over the top parking charges have led to 'the slow death' of Lambton Quay shopping precinct.

Specific and other parking issues

15 comments

A moderate number of submissions made up a collection of different parking-related comments. A few suggested new apartment developments should have parking underground or on the ground floor. Three comments stated The Plan needs to support proposed density with accompanying parking spaces and another three noted parking on Rintoul Street and Earls Terrace is already at capacity. One elderly resident was concerned about the loss of parking spaces to new residents in proposed apartment developments. The remaining submissions made individual points about parking-related matters.

Summary

A very large number of submissions commented on infrastructure improvements. Most comments expressed concern about capacity of water infrastructure or other infrastructure systems not meeting sustainability goals. Two hundred and thirty submissions were received for stormwater, mostly supporting proposed permeable surface requirements, while others expressed concern about stormwater network reliability and frequent pipe ruptures. The next largest number of comments received discussed hard waste management and supported circular economy principles.

Infrastructure General

10 comments

Several submitters made general infrastructure-related comments, with almost half stating infrastructure will need to be upgraded before intensification developments are built. Two submitters supported specific provisions or definitions in The Plan and another two commented on the structure or clarity of specific provisions. The remaining two submissions were individual comments about infrastructure in general.

Three Waters

250 comments

Three Waters General

5 comments

A small number of submissions discussed Three Waters in general, each submitter making a different point. One submitter supported the 'vision' for sufficient capacity in the water infrastructure and especially supported Hydraulic Neutrality requirements, suggesting in-pipe treatment of wastewater similar to Japan may be a suitable alternative. A third submitter stated developers want certainty around all water infrastructure being provided for future developments, while another stated The Plan was difficult to read and understand and they therefore opted to support the current Operative Plan. Lastly, one submitter discussed their objection to the Three Waters Reform.

Potable water

10 comments

Several submitters talked about potable water, mainly the capacity and reliability of drinking water for existing and proposed new residences in Wellington. Over half of submissions stated potable water supply is already at or exceeding capacity and reported bursting pipes and/or disruptions to water supply to residences during repairs. One submitter expressed concern that water pipe upgrades would not be completed to meet demand (including proposed developments) in a timely manner. Another submitter proposed water pipe upgrades should be sequenced and a final submitter argued irrigation systems should be banned.

Sewage

10 comments

Several submissions were received which discussed sewage with all but one comment expressing concern about the capacity of sewage infrastructure. Two submitters stated sewage infrastructure is already at capacity and at times not coping, and two other submitters wanted assurance from Council that the infrastructure will be upgraded in time to meet new demand. Two submitters proposed sequencing the upgrade of sewage infrastructure, and another submitter argued that coastal waters should be 'cleaner' and protected from sewage outfall into the ocean. A final submitter supported the provisions which reduce 'waste and sewage sludge'.

Stormwater

230 comments

A very large number of submissions commented on stormwater and all submitters supported improved stormwater services and capacity. Out of all submissions, about 200 submissions supported a pro-forma submission by A City For People which stated:

I support the minimum permeable surface requirements, which will ensure good stormwater management and reduce water runoff

A second group called Parents for Climate Aotearoa submitted an almost identically worded comment, supported by a small number of submitters.

Several submitters stated that stormwater infrastructure is already at or exceeds capacity now. A small number of those submissions added that new developments will drastically increase pressure on the stormwater network. Several submitters wrote about measures to increase resilience. Five advocated specifically for green stormwater infrastructure, two suggested all new building should have emergency water storage capacity, and one supported the water conservation strategies in the Centres and Mixed Use Design Guide.

A few submitters stated that stormwater capacity is already an issue and sought assurance that the infrastructure will be upgraded. One of those submitters explained this below:

No evidence of planning for the subsequent water run-off and the loss of pervious surfaces in the catchment. Run off will be further focused in fewer areas through the development of storm water networks, and this will have degrading effects on water quality. Work with experts on storm water, water quality and freshwater ecology to identify improvements in structure and approaches to development and design that enhance the status of water ways in the city, and in particular the Kaiwharawhara.

Two submitters wanted The Plan to go further and not permit any increase of stormwater. The remaining small number of submissions made individual comments about stormwater and generally expressed concerns about infrastructure capacity.

Hard Waste Management

200 comments

A very large number of submissions commented on hard waste management and all supported initiatives to reduce waste either via minimisation or recycling. All but two of the comments were submitted in support of the City For People pro-forma submission which supports:

[A] circular economy, provide space for innovation, education and behaviour change and create a tangible vision of a low carbon future. I support circular economy principles being integrated into the district plan so that waste is minimised and designed out of construction projects, and that resource recovery infrastructure is put in place to manage any remaining waste.

The remaining two comments were individual submissions and one supported The Plan's proposed reduction of waste and carbon zero goal by 2050. The other submitter noted the amount of waste created from the demolition of buildings and called for more sustainable construction and demolition methods.

Renewable Energy and Green Infrastructure

5 comments

A small number of submitters made general comments about renewable energy or green infrastructure. Two submitters commented on private household energy generation using solar or wind power and a third supported water conservation found in the Centres and Mixed Use Design Guide, adding that emergency water storage in multi-unit building should be mandatory. One submitter made text-specific comments about the Renewable Energy Generation section, and a second expressed concern about The

Plan's permissible approach to renewable energy generation in rural areas and their negative impact on neighbouring properties and their owners.

Hazards and Risks

365 comments

Summary

A very large number of submissions were received discussing Hazards and Risks, with most comments relating to natural hazards. Almost half of those submissions emphasised the need for climate action.

The second largest topic was earthquake risk and resilience, which was referenced by a substantial number of submitters. Over half of those were concerned about earthquake risks around 6+ apartment buildings. Specific text changes or amendments for various natural hazards provisions were proposed by a considerable number of submitters. Flooding issues gathered a considerable number of submissions and over half opposed their current management or proposed provisions. Fire was the least commented on natural hazard topic, and a small number of submissions discussed individual topics.

Natural hazards general

40 comments

A considerable number of submitters commented on natural hazards in general. Over a third of those either proposed text changes or amendments or made specific comments to provisions. Of the total natural hazards submissions, there was a relatively even split between those who expressed opposition and those who were in support.

Of the opposing submissions, most made simple opposing statements, while one criticised the restrictiveness of the Natural Hazards provisions. This was countered by Greater Wellington Regional Council, who supported The Plan's risk-based approach to natural hazards and supported:

[T]he draft Plan's overall framework for hazard management, whereby hazard sensitivity and activity restrictions are identified through spatially defined hazard overlays.

Most of the supportive submissions were concise such as 'support with amendments'.

The remaining submissions were comments on a variety of topics related to natural hazards.

A small number of submitters made general comments about hazards and risks. Fire and Emergency New Zealand's submission addressed the need to enable operation of emergency services in areas with increased risk of natural hazards. A separate submission suggested more stringent restrictions should apply to the high density urban commercial zone to lower the risk of natural hazards such as earthquake, storm, tsunami, wind canyons, and fire.

The final submission discussed the structure of The Plan document and proposed specific changes.

Climate Change

225 comments

A very large number of submissions commented on climate change matters. Most of those were submissions from A City for People articulating the urgent need to address climate change and offering support for emission-reducing initiatives such as active transport. The A City for People submission stated:

20-min city reduces emissions and increases community, resilience – Multifunctional community spaces as Climate Action Hubs, innovation, education behaviour change and climate vision – circular economy and resource recovery, reduce waste.

The several remaining submissions emphasised their desire for climate action and a few supported The Plan's approach to climate change.

Changes to weather and wind were also raised. Two submitters expressed support for the restriction of hazard sensitive activities in high-risk areas including 1 in 100-year storm events, while another noted:

Allowing dormitory buildings of six stories in height would impact greatly on access to sunlight and create wind tunnels. With climate change clearly in evidence this is not something to be ignored.

Earthquake Risk and Resilience

65 comments

A substantial number of submitters discussed issues relating to earthquake risks and resilience. Of those, half referred to earthquakes, 19 to fault lines, 11 to tsunamis, and 3 to liquefaction. Out of those, over half opposed The Plan's current approach or expressed concern about earthquake-related risks, and a moderate number made neutral comments such as proposed changes to wording or proposed alternatives. A small number supported The Plan provisions relating to earthquakes as drafted.

The proposed intensification was cited as the main risk to safety and life during a major earthquake by most submitters. A small number of submitters were critical of recently built high-rises, noting the number of those which had suffered during the Kaikōura earthquake, suggesting timber-framed structures withstood earthquakes better.

Ground bearing capacity was identified by several of submitters as why they opposed tall structures. Out of those submissions, a small number discussed particularly unsuitable locations for 6+ storey buildings, for example:

Allowing redevelopment on the scale proposed in lower Hay Street will increase the risk that an earthquake will cause major damage to property in this area.

Locations noted by submitters included Hay Street, Hania Street, Baring Street, Moir Street, Kent Terrace, and Cambridge Terrace. A few submissions cited Wellington's position as an earthquake-prone city as the main reason for their opposition to 6+ storey developments.

A few submitters proposed specific text changes or amendments to earthquake-related provisions. A small number of submitters supported The Plan's approach or specific provisions relating to earthquake risk or resilience.

A small number of submitters argued against intensification in character and heritage areas based on the increased risk during an earthquake. Another small number of submissions proposed natural hazard overlays such as flooding, fault rupture, and tsunamis should be included in LIM reports.

A few submissions discussed the cost that earthquake engineering solutions impose on buildings or roading infrastructure, which would either be passed on to the purchasers or result in risks being taken to keep building costs at a minimum, such as at Melkham Towers.

A further few submitters commented on earthquake effects on water supply. Two suggested Three Waters infrastructure should be better protected from damage and prepared for the event of an earthquake. Compulsory emergency water storage tanks in multi-unit buildings were suggested by one submitter.

A few more submissions repeated the same suggestion and advocated for exemptions for areas with natural hazards such as fault lines. They proposed the following:

Encircling inner-city residential neighbourhoods should be designated as being covered by the qualifying matters provisions in the National Policy Statement on Urban Development.

An identical unintelligible comment was submitted by a small number of submitters, and the remaining submissions were comments on a variety of earthquake-related topics.

Flooding

30 comments

A considerable number of submissions discussed flooding in Wellington. Of those, over half opposed The Plan's provisions or the way flooding is currently addressed. Several submitters made suggestions as to how flooding could be mitigated, managed, or referred to specific sections in The Plan. The remaining small number of submissions either requested clarification, expressed support, or were unintelligible comments.

Of the opposing submissions, several identified flooding as a current and recurring issue. Submitters were particularly concerned with water rushing downhill, arguing the proposed intensification would lead to larger volumes of water draining down impermeable surfaces and hills and worsen this unacceptable issue. Submitters described water volumes, debris carried downhill, and risk of erosion and slippage from rain events as the results of insufficient stormwater capacity. A few submissions stated Three Waters capacity had been reached and it would be unable to cope with intensification and the further demands this would place on the infrastructure.

Among the several suggestions to WCC, eco disaster risk reduction measures were proposed to mitigate flooding at lower Prince of Wales Park and Papawai Stream. Another submitter proposed natural hazard overlays (including flooding) should be included in LIM reports.

The remaining submissions were either unintelligible comments or discussed a variety of flooding-related topics.

Fire

5 comments

A small number of submissions discussed fire as a natural hazard in Wellington and all submissions addressed individual fire topics. Half of those comments were submitted by Fire and Emergency New Zealand and generally addressed their functions and related Plan provisions. Fire and Emergency supported the definition for 'functional need'.

Two further additions to The Plan were suggested by individual submitters. One proposed firebreaks in vegetation, while the second submitter suggested recognition of natural phenomena, including fire, should be included in The Plan, especially relating to services and infrastructure.

Summary

Submitters expressed concerns that heritage and cultural values are not sufficiently protected in The Plan. The contribution to visual amenity and the intrinsic value of character and heritage were reiterated in the small number of comments to this section.

(*Note that although there were many submissions which included comments about historical and cultural values, the vast majority of these were submitted to other sections of The Plan, i.e., those which pertained to intensification and its potential impact on character areas or character homes. Consequently, there are few submissions discussed in this section.)

The small number of submissions to Part 1 of The Plan on 'Heritage and cultural values' were by and large lengthy and detailed.

One submitter (on behalf of a group with a stated professional interest in heritage and architecture) submitted that:

Our submission is that historic heritage (a matter of national importance at section 6f of the Resource Management Act) and character have been given inadequate weight in the Draft Wellington City District Plan.

They went on to state that the approach "appears in some instances to be predicated on flawed or incomplete information and analysis". They disputed the distinction made between 'heritage' and 'character' in The Plan, noting that there are a number of issues with New Zealand's system of heritage protection.

Another two submissions, which were repeated verbatim, reiterated this, specifically calling for The Plan to be amended to:

Recognise that character is in part derived from heritage ... in pre-1930s character areas...and use a comprehensive, holistic definition of character as a qualifying matter under the National Policy Statement-Urban Development.

Another submitter sought financial support and practical help for earthquake strengthening of heritage buildings from WCC, while another sought more protections for character, demolition controls, and a more comprehensive assessment of the city to identify non-heritage and non-character sites for intensification. Final comments were around the visual appeal of character homes, and were typical of many comments discussed elsewhere in this report.

Summary

The bulk of the comments on this topic were about climate change with submitters overwhelmingly calling for climate issues to be prioritised in decision-making. The urgency of submitters was expressed with use of such phrases as “climate emergency” and “climate crisis”. Many outlined specifics in their comments as to how this issue could be addressed; this included support for the 20-minute walkable city and low-emissions transport modes.

Environmental protection measures such as the following were supported: retaining existing green/open spaces (for their environmental value), retaining trees and vegetation, and “greening” the city.

In addition to environmental protections, a large number of submitters called for retention of green or open spaces for the use and wellbeing of city residents. Around half of the 100 comments on open and green spaces for public use called for more green and open spaces, particularly given increasing populations and intensification. Remaining comments called to attention the importance of open and green spaces to wellbeing. This was sometimes in relation to open and green space, and sometimes in relation to these places offering recreation opportunities of both an organised and informal nature.

Environmental protections

350 comments

Climate change action

300 comments

An array of submitters addressed climate change in an array of contexts, most commonly calling for climate change to be acknowledged and prioritised in decision-making. This was conveyed through both explicit statements and in comments about increasing sustainability or reducing waste, and emissions/carbon reduction comments.

A very large number of submissions included the phrase “climate emergency”, many of which were reiterations from submitters that this is indeed the situation we face (applicable to the global, national, and local communities of which we are all a part). A large proportion of these expressed support for the 20-minute city/neighbourhoods concept, including approximately 200 submissions received through A City for People, which stated:

I believe that we are facing a climate emergency and that the 20-minute city concept supports emissions reduction and community cohesion and resilience.

Submitters expressed their wish that WCC be more climate focused in various ways, suggesting they make it a “key focus”, address mitigation and resilience more clearly, take bolder steps to address the likely impacts, and simple statements to the effect that “action is needed”. The sentiment was clear from these comments that climate change should have greater precedence in planning.

I also sincerely hope that the positive words about environmental protection and climate change are not just words but are instead major goals that you will work tirelessly towards.

A considerable number of submitters deemed emissions reduction a worthy goal and supported walkable (or “20-minute”) cities, and more broadly, intensification, for this reason. Relatedly, additional comments expressed support for low-carbon transportation and green and active transport, as well as calls for waste minimization initiatives to be included in The Plan, particularly construction waste.

Climate change was noted tangentially in a several submissions related to the importance of sunlight access from homes, and the impact this may have on home-owners’ ability to use solar power.

Tree and vegetation protection

20 comments

A moderate number of submitters called for the protection of trees and /or vegetation for environmental reasons. The retention of trees and/or vegetation was viewed as necessary to maintain biodiversity and to ensure the ongoing existence of nature corridors.

The maintenance of vegetation was said by one submitter:

...to balance increased residential densities and to control heat island effects and effects from loss of flora and fauna that result from increases in the extent of the built environment.

Environmental action

15 comments

Submitters raised several actions that can enhance the environmental focus of Wellington, such as greening the city and “green walls”. Additionally, small scale composting, reducing the negative impacts on waterways, green infrastructure, community gardens, and waste minimisation actions were called for.

Protecting natural features

10 comments

Several additional comments pertained to protecting existing natural features and existing open/green spaces. Submitters noted that while intensification may be needed, so are open spaces and visual access to natural features. One submitter stated the following:

There is also a need to identify and protect areas of existing green space, especially in locations where significant intensification may occur.

More green or open space

485 comments

The importance of open or green space

210 comments

A very large number of submitters stated the importance or value of city residents having access to green or open space. A large proportion of these were pro-forma submissions from A City for People, in which it was noted that there is a:

...strong correlation between good green and public spaces, positive mental health and wellbeing outcomes.

The other several submitters expressed support for a mix of large and small parks, parks generally, or outlined the ill effects of city living when there is a lack of access to green space. One submitter made the simple statement: “I want parks”.

*Note that green or open spaces for the purposes of recreation is discussed below.

Need to develop more open or green space

50 comments

Around half the comments on green and open space were calls for more provision of open spaces, both to be stated in The Plan and more generally. A considerable number of submitters wanted to see steps taken, particularly from developers, to earmark land in the city for open, green, or public spaces. While several submitters included specific figures around the amount of green/open space currently available to users of the city, many more expressed simply that some, or more, green/open space is needed.

To do density well more parks / public space should be planned, similar to Carrara Park.

Any multi-unit dwelling that doesn't have at least 30% of its site free of building should be required to make a financial contribution towards public green space.

Several submitters identified locations deemed suitable for protection or for conversion to open/green space, for example brownfield sites; “the car park next door to Floriditas, opposite Garrett Street, should

be made into a green space"; and protection was sought under the Reserves Act for Frank Kitts Park. Others spoke of the importance of "adding" or "extending" greenspace.

A few submitters quoted a Boffa Miskell report in which it was stated that there is: "a deficit of space for existing residents of the central city which additional space should be provided for".

Need to develop more recreation space

25 comments

A considerable number of submitters stated there ought to be space – either dedicated to, or able to be used for – recreation in the city. Submitters emphasised the importance of spaces for people to undertake recreation activities of a range of types. One person made the point that the "key to successful urban density" was to have a range of parks suitable for a:

...range of outdoor and community activities from organised sport, through to walks, through to community events, through to people just sitting in the sun, outside of their apartment.

Another submitted that The Plan would not "create enough space for private and public recreation". Perhaps because of the prevalence of organised recreation (such as organised sport), there were few comments directly targeting provision for this, rather there were several comments in which recognition of passive and informal recreation were called for.

There were a few comments expressing support for multi-use spaces that combine recreation with other uses, such as community gardens. A few additional submitters called for accessible recreation spaces. Accessible was explained in different ways, whether physically accessible by proximity to place of residence, disability-friendly or rainbow-friendly, or accessible in the context of land not being ringfenced by private recreation providers, such as golf courses.

Safe and inclusive public spaces

200 comments

A very large number of submissions discussed the need for Wellington to have welcoming public spaces where members of the LGBTIQ+ community can feel safe, relaxed, and represented.

The sentiment expressed in this submission was linked to safety issues for the rainbow community and the importance of appropriately designed public and open spaces. These 20 pro-forma submissions were received through A City for People but contained additional points relating specifically to the rainbow community.

Pōneke's public spaces could reflect and honour our rich and diverse rainbow history and culture, be welcoming, safe and inviting spaces, making clear the rainbow community belongs and matters, and thus playing a part in supporting LGBTIQ+ people... These public spaces should ensure there is adequate lighting, space and visibility, especially for more isolated or bushy areas, and especially for nighttime. This will make public spaces both feel and be safer, making them usable for a greater portion of the rainbow community and wider community. Apply Crime Prevention Through Environmental Design (CPTED) principles.

SNA (Significant Natural Area) designation

38 comments

*Note: There was an SNA section of The Plan (page 147) that submitters were able to submit directly to; the comments discussed here are those that were received from submitters who chose to submit to the 'General' section of The Plan.

The bulk of submissions on SNAs to Part 1 of The Plan were in opposition to an SNA designation on submitters' own properties or on private property more broadly. Submissions pertaining to individual addresses with specific requests have been viewed individually and assessed by WCC staff.

Almost all submissions to the general section of The Plan pertaining to SNAs were in opposition.

Objections were based on perceptions that the implementation of SNA rules would have negative impacts for landowners (including both residential properties and farms), including erosion of property rights; an unfair “landgrab”; ecologist expense; lack of financial compensation from WCC; diminished land value; loss of land use; and lack of recognition for landowners already regenerating their own land.

If the council proceeds with its plan to designate SNA overlays on private property, the likely “reward” my partner and I will get for all her efforts is the effective confiscation of the land.

WE DO NOT SUPPORT SNAs ON PRIVATE LAND!! While we can get behind the ‘intent’ of the SNAs, that is about all that we currently agree with.

Several submissions supported the conservation aims of SNAs but felt that its implementation was too blunt and that it will not equitably or adequately protect natural areas. Several additional submitters claimed that, rather than representing a protective framework, the SNA approach risks the loss of biodiversity – for example resulting in landowners rushing to remove vegetation prior to the rules being implemented.

How are we supposed to take this designation seriously when it includes a large chunk of concrete, flowerbeds and a veggie patch? It penalises the very people who have taken care of the bush and incentivises clearing of the bush.

Several submitters were critical of the WCC consultation process for SNAs, and wanted to see a longer consultation period in which issues have more time to be discussed and understood.

Submitters in some cases offered alternatives to proposed SNA rules, including more stringent monitoring, enforcement, and non-compliance action, Council purchase of private land of natural significance, or financial support for affected areas via rates rebate or similar.

A few submitters noted that vegetation under protection by SNA designation is not only not valuable, significant or indigenous, rather it can be comprised of exotic species and/or weeds.

The single submitter who expressed wholehearted support for SNAs did so on the basis that it would promote biodiversity, and they were critical of development-orientated property owners who object to SNAs because of their belief that this devalues their property.

Summary

Zones comments were comprised of just over half pertaining to residential, and just under half to rural, commercial, city centre, medium density, and mixed industrial.

Residential zoning matters garnered a very large number of comments, the vast bulk of which were in support of various objectives and provisions regards to specifics such as setbacks, minimum permeable surfaces, and the projected outcomes of more affordable housing resulting from this planning process.

A substantial number of submitters supported intensification measures but warned that this must not come at the cost of liveability and wellbeing for urban residents, while a moderate number wanted to see maximum heights limits increase (in certain areas) to accommodate growth.

Suggestions for better ways to intensify the city were received in very large numbers, often from residents who were concerned about how intensification would impact their suburb. Additionally, these submissions frequently contained suggestions of places deemed more suitable for intensification.

The perceived negative impacts of intensification permeated many submissions, and were mainly about building heights and the potential for higher buildings to block sunlight and irredeemably alter the city's character. These issues were of great concern to many submitters, whose language was oftentimes strong on this topic. In spite of these issues, there was generally a consensus that intensification must occur.

Comments about other zones (i.e., rural, commercial, medium density, and mixed industrial) numbered only slightly fewer than residential – around 750. Of these, around a third were concerns that medium density development would have a negative impact on amenity and liveability of city residents. Calls were made to retain MRZ for some areas proposed to be up-zoned to CCZ. Relatedly, a similar number of CCZ comments were mainly in support of increasing building heights in a tightly defined city centre – this was often suggested as a means of protecting surrounding residential suburbs from intensification.

The timing and sequencing of the rollout of intensification was addressed in a sizeable number of submissions, a large proportion of which were pro-forma submissions from Live Wellington calling for phased intensification starting with brownfield sites in the city. Similarly, an additional considerable number of submitters specifically called for this to occur, wanting to see the repurposing of industrial city land for housing before existing suburbs were intensified.

Topography was a topic of concern for a sizeable number of submitters, most of which focused on the need for planning decisions to account for the steep and, at times unstable, nature of the hilly landscapes upon which planning rules were overlaid.

RESIDENTIAL ZONE

900 COMMENTS

Support for urban development

750 comments

Setbacks and site coverage

230 comments

A very large number of submitters offered support for removing front and side setbacks and maximum site coverage rules, including approximately 200 submissions received through A City for People, which stated:

I support removing front and side setbacks (required minimum building distance from boundary) and maximum coverage requirements from all residential zones to reduce site fragmentation, make the most of small sections, and allow for bigger and better-quality backyards.

A couple of submitters noted that increased site coverage comes at a cost and that the loss of gardens and green space must be weighed up against the need for more housing, while a few others noted that usable space between buildings must be adequate and therefore some restrictions on maximum site coverage must be enforced.

Support for minimum permeable surfaces

230 comments

A considerable number of submitters expressed support for the minimum permeable surface requirements proposed in the District Plan, which will ensure good stormwater management and reduce water runoff. This included approximately 200 submissions received through A City for People.

Support affordable housing

210 comments

The bulk of submissions on this topic were the 200 submissions received through or in support of A City for People which stated:

I support options 1, 2, and 3 of the inclusionary zoning proposals, as these options are sure to increase the supply of affordable and social housing, and I prefer option 3 to option 2 as it provides better flexibility and can raise revenue for social housing provision. I strongly support Wellington City Council expanding our City Housing stock across the city, and using revenue raised from Option 3 towards this.

A few submitters argued that there is currently a great need for affordable housing throughout Wellington, from the inner city out to the suburbs. Two submitters felt The Plan as it stands currently will not achieve this goal, arguing the development encouraged by The Plan will only lead to more inaccessible housing that will not alleviate the stress on those who currently struggle to afford to rent or buy in Wellington. These submitters urged WCC to make alternative intensification plans to ensure that The Plan will in fact deliver affordable housing in the city, rather than leaving it up to the “wild west” to dictate property prices.

Intensification but not at the cost of liveability or amenity

90 comments

A substantial number of submitters made comments indicating general support for urban development and increased density to provide more homes in Wellington while also stipulating this should not come at the cost of quality of life and amenity for residents. In particular, retaining adequate sunlight, heritage, privacy and liveability were important to these submitters.

Approximately 80 submissions were made in support of the Live Wellington pro-forma submission which stated that Wellington’s liveability as well as its character and heritage can be protected at the same time as new housing being built. It recognised that not all old buildings need to be retained, and argued that people’s sense of connection and place are not disposable commodities.

Rather than wholesale deregulation and the widespread removal of protections, heritage and character can be considered as part of community dialogue, while new construction focuses first on under-utilised land.

These submitters argued that heritage buildings should be protected from inappropriate development and that The Plan must better account for the need to maintain and enhance amenity values. In particular, this submission called for The Plan to:

- *Amend the draft Plan to recognise that character is in part derived from heritage (as set out in the Operative Plan) in pre-1930s character areas (as defined in the Operative Plan), and use a comprehensive, holistic definition of character as a qualifying matter under the National Policy Statement-Urban Development*
- *Retain demolition controls generally in the pre-1930s character areas (as defined in the Operative Plan) while identifying areas of particular character within these (for example as*

recommended in the revised Draft Spatial Plan) to enable a more granular level of control over demolition.

- *Clearly identify community-based planning for intensification as a method for increasing housing supply within areas subject to the revised demolition controls set out above.*

Building heights and characters change support

20 comments

A moderate number of submissions expressed support for removing maximum height limits or increasing building heights generally to enable more housing in Wellington, or supported increasing building heights in the CCZ or in suburbs such as Mt Cook, Mt Victoria.

I live in Mount Cook and support the proposed height and building-character changes under the Draft District Plan. It is critical that our city build more units of housing, and our suburb is very well situated to grow vertically and to help relieve Wellington's most pressing defect, the price and availability of living space to its people.

A small number of these submissions also indicated support for the removal of blanket heritage protections, suggesting that some individual buildings should be protected but that protecting heritage areas inhibits development when the city urgently needs more housing.

"Heritage areas" and "heritage buildings" get in the way of more housing -- especially "heritage areas". Individual buildings should be the subjects of protection, not entire areas. More often than not, those "heritage" buildings aren't really worthy of protection - they are just old and decrepit. Protection of these houses only protect the interest of the private owners of them, not the wider public.

Suggestions for intensification

700 comments

Specific locations in relation to urban development

370 comments

Mt Victoria

105 comments

The bulk of submissions pertaining to Mt Victoria expressed concerns about building heights diminishing liveability for residents of existing dwellings due to lost sunlight, and negative impacts on the aesthetics and character of the area. There were a large proportion of submitters expressing concerns about loss of character, and there were a moderate number of submissions in which calls were made to reinstate the pre-1930s demolition rule.

Reinstate the pre-1930s demolition rule to, at a minimum, the areas recommended by WCC in the Draft Spatial Plan plus the areas recommended by Heritage NZ.

Submitters frequently included elaborate descriptions of heritage characteristics and their contribution to visual amenity of both the suburb itself and to Wellington more broadly.

Khandallah (Onslow Road)

40 comments

There was opposition from a considerable number of submitters to Khandallah being zoned as a local centre. Opposition to proposed building height changes was grounded in fears about reduced amenity and liveability, shading, lack of parking, and inadequate infrastructure and transportation services to service forecast population growth. Submissions frequently included opposition to Johnsonville train line being classified as rapid transit, as the following example shows:

I oppose Khandallah being zoned 21 metres building height, which is 6 storeys high. 1) The Johnsonville train is NOT RAPID TRANSIT. 2) The Khandallah village centre is a NEIGHBOURHOOD CENTRE like Ngaio. The Khandallah village is not a "local centre" like the much larger Karori and Newtown shops. 3) 3 storeys is sufficient. 6 storeys is unacceptable.

Like the one above, several submissions referenced other suburbs, some of which were deemed more suited to intensification.

There were several submissions in support of the classification of Khandallah as a local centre, one making the point that:

Khandallah village is anchored by a supermarket, has a chemist, a medical service, and a butcher's shop, not to mention a town hall, church, pub, three restaurants and a library. If that does not meet the key requirements of a 'local centre' I don't know what does.

Thorndon and the Hobson Precinct

35 comments

Submissions to Part 1 discussing Thorndon were divided between those in which the protection of heritage was deemed of vital importance to the area and Wellington more broadly, and those in which submitters wanted to see areas in or adjacent to Thorndon intensified. There were only a small number of submissions that supported intensification measures for Thorndon, and these frequently called for the use of vacant or underused land (in Thorndon) for development.

The Hobson Precinct was noted in the context of submitters objecting to its City Centre Zone designation. Such objections were in line with other submitters, the bulk of which wanted to see heritage and character retained in Thorndon and for the area to not be subject to upzoning.

Wellington Central and Te Aro

30 comments

A range of viewpoints were expressed around intensification of the central city, which included Te Aro and Wellington CBD. These were primarily of the opinion that intensification should concentrate first on brownfield sites rather than at the expense of character areas. Although the overall consensus was to protect character areas, a small number of submitters expressed a preference for prioritising “homes for people” over the protection of character, and a few wanted to see high growth in the centre.

The height limits should not impose an arbitrary barrier to the best use of the land in Wellington's CBD, and progress in structural engineering and earthquake-resilient design has opened the door to new buildings that are taller and more resilient than previously possible.

There were calls for a more nuanced approach to building height in Te Aro to prevent low amenity streetscapes; these came alongside calls for character and heritage protection in the city centre more broadly. Additionally, intensification around transport central hubs was supported.

Large asphalt car parks in Te Aro are ideal locations to build high rises rather than the suburbs which are now being deemed central city.

There are areas of Wellington which are much more suitable [than Lower Kelburn] for intense urban development, for example: the area of Te Aro especially around the state highway 1 (known as the bypass).

A few submissions noted that a lack of central city green space may preclude successful inner city living if housing is intensified. Lastly, one person noted that the CBD is distinct in its mix of commercial and residential land-use, and that this needs to be considered in plans to intensify – namely, that residents should be equally prioritised.

Oriental Bay (Hay Street)

30 comments

There was broad opposition to intensification in Oriental Bay, particularly Hay Street. Submitters claimed important heritage status for this area, and particularly objected to proposed height increases of up to 6+ storeys.

Concerns expressed about the anticipated effects of intensification included reduced liveability from increased traffic congestion, access difficulties due to narrow streets, infrastructure pressure, and parking issues. The following comment summarises some of these concerns:

I strongly support the Oriental Bay Height Area (status quo on the Parade) as contained in the draft district plan; and, request that in lower Hay St the Medium Density Residential Standard (MDRS) of 11 meters height limit apply (i.e. I oppose the 21 meter (6 plus storey) proposed height limit, in the DDP).

Aro Valley

25 comments

A considerable number of submitters raised concern about changes to building rules affecting existing residents through loss of character, sunlight, privacy, and community feel. A few submitters noted that housing in Aro Valley was already at sufficient density.

The current building stock is being updated by homeowners and developers who are sympathetic to the character of the area and who recognise its unique and irreplaceable value. Aro Street contains several 3 storey town house developments which blend harmoniously with older buildings in the area while also providing greater density housing.

Submissions in favour of protecting a unique mix of residents appeared in greater numbers from Aro Valley submitters than for other suburbs.

Newtown

25 comments

There was support for development of more affordable, quality housing, but not at the expense of Newtown's character and liveability. Consequently, the suburb was mentioned in both the context of support for intensification, and that the area needs to be protected from intensification.

Submitters noted that other (brownfield) areas could be intensified first, and that industrial or commercial land banking should be discouraged by WCC. Additionally, people raised concerns about intensification on the basis of the following: lack of access to sunlight/shading (see comment below); lack of privacy; impact on character or area; and that a "broad brush" approach is inappropriate.

In Newtown the many 90-120 year-old wooden houses need sunlight to stay dry and warm. I wish to see the special character of Newtown retained and the health of its homes.

Submitters spoke of achieving a balance that can accommodate intensification and protect the special character of Newtown. They used phrases such as "density done well", and called for:

...a plan that maintains the character yet allows development in the right places and achieves the growth the council wants.

Karori

20 comments

The bulk of Karori comments to this section of The Plan questioned the ability of the suburb to absorb greater population numbers. Karori was deemed to have insufficient capacity to accommodate intensified housing due to being "full", with its infrastructure perceived to be under considerable pressure already.

The zoning in Karori makes no sense. There's no way almost the full suburb should be general residential zone.

A small number of these submissions positioned Karori against Khandallah, noting that Karori's designation at a "local centre" is suitable whereas Khandallah should not have this designation (note that similar comments area also reported in the section on Khandallah on p. 32).

Access to/from Karori was also raised as a factor limiting the prospects for intensification (due to there being "only one major road in".)

Lastly, there was a call for Homewood Avenue to be classified as a Character Area, and a request that an SNA designation not apply to several Karori properties (so that there are fewer restrictions on building sizes and numbers).

Kelburn

15 comments

The moderate number of submissions were largely calls to preserve the character and heritage aspect of Kelburn, and, in particular, Lower Kelburn.

A few of these comments raised the importance of protecting view shafts in a number of suburbs, including Kelburn, while most submissions called for the retention of the heritage characteristics they saw as forming an integral part of both the suburb and Wellington more broadly. A few claimed that upzoning Kelburn may not result in an increase in affordable housing stock, and others protested that Kelburn will be impacted when other, more suitable, locations lay underdeveloped.

Well-functioning, established heritage and character housing and neighbourhoods such as Lower Kelburn Neighbourhood will be among the first to be demolished and irretrievably destroyed not for the purpose of creating new affordable housing but to provide investment opportunities and additional residences for already wealthy property owners.

Mt Cook

15 comments

Submitters' concerns were about the suitability of Mt Cook for intensification. They cited loss of character and sunlight, and diminished liveability as a perceived outcome of intensification as proposed in The Plan. Mt Cook and its neighbouring suburbs were considered to have insufficient capacity to accommodate population growth while also meeting WCC aspirations of liveability (including sunlight and green space access and infrastructure capacity). On this point, one submitter called for WCC to "leave Mt Cook alone". The few comments in favour of intensifying Mt Cook highlighted simply that this suburb was suited to increased building heights.

Ngaio

15 comments

Ngaio was noted in submissions to this part of The Plan mostly in the following two contexts: its ability to handle increased populations was questioned on the basis that infrastructure would not cope; and its status as a 'neighbourhood centre' was endorsed by three submitters (all in submissions which advocated for retention of the status quo in Khandallah).

The addition of 11,000 to 13,500 people along the line will result in overcrowded trains and buses and even more slow and congested traffic on SH1, Onslow Road, Ngaio Gorge Road, the Hutt Road and Thorndon Quay. None of these roads has capacity for expansion.

Submitters opposed Ngaio's designation as "Type 4b, 6-10 storey residential", which was seen as being based solely on the premise that the Johnsonville Railway Line is Rapid Transit (a point much disputed throughout this engagement consultation). On this point, one submitter questioned the effectiveness of intensification in Ngaio:

This is driving zoning to use unaffordable construction methods with higher carbon emissions, yet it achieves no more growth than lower-height sustainable alternatives.

Ngaio was also considered to have character and heritage value in need of protection with a few submitters calling for this to be retained in any intensification processes.

Lastly, one submitter expressed concerns about inadequate open space connections through the land of the Kilmarston Block if changes to development rules are implemented.

Johnsonville

15 comments

A small number of submitters noted that Johnsonville was suited to increased intensification, sometimes on account of its proximity to public transport routes.

Rather than the proposed scatter gun approach of towering 22m townhouse/apartment complexes around suburban centres, it would make much more sense to go back to the WCC

Kilbirnie – Johnsonville growth spine proposals (Wellington Urban Development Strategy of circa 2006).

However, there were many comments (not included here as they were not specifically linked to urban development outcomes) stating simply that Johnsonville could not be considered a Rapid Transit line.

A few submitters noted concerns about disruptions caused to residents when these buildings are built, due to the steep land and complex nature of building along the Johnsonville railway line.

Tawa 10 comments

Tawa was cited in several submissions as a location more suited to intensification than centrally located areas. It was deemed appropriate for a number of reasons, namely because of its lack of existing character, its proximity to transport, and the availability of space and land, as the following comment shows:

Council should perhaps consider creating high density housing in places like Upper Churton Park, Granada North, Tawa, etc, where there is open land and where high-capacity infrastructure can be established rather than putting aged and deteriorating inner suburb infrastructure under strain beyond its capacity.

The few submitters who expressed support for intensification of Tawa did so on the condition that a more customised and strategic approach to providing housing was provided. Additionally, there were twin concerns that local topography is not appropriately considered in The Plan and that infrastructure would not be able to sustain intensification as proposed in The Plan.

Brooklyn 10 comments

Concerns about Brooklyn centred on loss of character, privacy, and reduced liveability as a consequence of changes to building heights.

Miramar 5 comments

There were two calls for the medium density zoning in Miramar to extend along the eastern side of Darlington Road as well as the western side (up to Totara Road and up to the open space area) to ensure balance on both sides of the valley. Another submitter had the following comment:

Rather than trying to keep moving an increasing number of people to work in the CBD would it not be better to try to encourage decentralisation of government employment closer to where the population already lives including outer suburbs which already have well developed and substantial service centres such as Kilbirnie, Johnsonville, Karori and Miramar as well as the satellite cities of Hutt, Porirua, Kapiti and Upper Hutt?

Miramar was deemed appropriate for densification by one submitter as this was felt to enable essential workers (such as nurses and teachers) to live closer to their places of work.

Develop alternative sites 130 comments

Brownfield sites, vacant offices and other commercial buildings, parking lots and other under-utilised land were preferred options for development for a large number of submitters.

There are plenty of brownfield sites that ought to be developed before allowing developers to build tall buildings in the historical areas. In addition, there is an increasing number of vacant office floors and buildings. Why not convert those into apartments? The buildings and the supporting infrastructure already exist. That is a big cost and environmental saving.

Some of these submitters offered specific sites or areas that they felt should be developed instead of areas that would have a larger impact on existing homeowners and residents. Taranaki Street, Adelaide Road, Cambridge Terrace, Hania Street, Home Street, and small parts of the Town Belt were all put forward as suggestions.

Approximately 80 submissions in support of a submission from Live Wellington argued that The Plan must identify development partnerships as a method for achieving an increased rate of development on land that is underutilised.

Involve communities in city planning processes

90 comments

The Live Wellington submission was supported by around 80 submitters, who discussed the value of community participation in city planning. The following is the opening paragraph which articulates this:

Given the opportunity, Wellingtonians will relish the challenge of working together. Some suburbs such as Newtown are proactively taking a lead in rethinking their localities. Such initiatives create a sense of community, enhance democracy and deliver change in ways that build on community strengths. We want to see participatory design projects, coupled with clear housing targets, so communities are involved in welcoming new people. Imposing arbitrary change when better options exist simply fosters local resentment.

I submit that the draft District Plan needs to be amended to identify a sequence of communities which will be involved in community-based planning, based on the sequence set out in the Spatial Plan.

Several submitters commented on citizen or community involvement in city planning matters. Most expressed the value that citizen agency, community participation, or community/local government partnerships bring to the table. It was suggested WCC should recognise and treat iwi and local communities as stakeholders of their neighbourhood in a co-development city-planning process. Deliberative democracy was another term mentioned, which not only includes active community participation but also community cohesion and pride.

Impacts of intensification

300 comments

Building heights

200 comments

Wind tunnelling

110 comments

A sizable number of submissions discussed adverse wind effects in Wellington city. All but two submissions expressed concern about or opposition to The Plan's provisions. The most cited issue was the tunnelling effects of wind or wind canyons. A substantial number of submitters expressed support for the Live Wellington submission which stated:

District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours.

Submitters argued The Plan's proposed building heights would create an even windier city and less liveable Wellington.

Cold, in shadow and windswept with only an occasional glimpse of our magnificent harbour.

A small number of submissions suggested wind effects should be included in Design Guides and relevant Standards.

Loss of sunlight

90 comments

A sizeable number of submitters expressed concerns about intensification and building height increases due to the loss of sunlight to smaller 1-2 storey residential properties that would result, and the subsequent impact on people's quality of life.

Of these, a considerable number of comments related to negative impacts on health, both mental and physical, associated with loss of sunlight. Damp, mouldy homes were a concern for some, while others noted the necessity of having adequate access to direct sunlight for mental health and wellbeing.

A considerable number of submitters opposed the minimum daylight hours rule, arguing that a minimum of two hours of daylight is insufficient for maintaining a healthy, comfortable home. A few of these comments called for the term “sunlight” to be used instead of “daylight”, noting that the two have different meanings, particularly in practice, where access to direct sunlight heavily impacts quality of life, including mental and physical health, as well as the home environment.

A minimum of 2 hours daylight into habitable rooms is a backward step in ensuring dry homes and healthy quality of life. Such a rule will also be less environmental with the loss of passive heating. "Access to daylight is fundamental to liveability and amenity of interiors and a significant contributor to the quality of life to its occupants" (architect and urban designer, Graham McIndoe on Scoop). With intensification "there is considerable potential for daylight robbery in terms of occupants of adjacent properties experiencing loss of winter sun and summer evening sun" (Alison Tindall, member of the Planning Institute on Scoop). The 'daylight robbery' effect will also result in the loss of property values. Such a rule change disenfranchises ordinary homeowners to the benefit of developers.

A moderate number of submitters made comments about implications on the environment that could result from loss of sunlight. Increased reliance on electrical appliances (e.g., use of laundry driers and for heating homes) was seen as a negative environmental consequence, as well as having a negative financial impact on residents. A small number of submitters noted that reducing the amount of sunlight homes get will also impact on efforts to shift to more environmentally friendly power sources as homes that are shaded by neighbouring buildings will not be able to benefit from solar panels. A few submitters noted that reducing the amount of sunlight in residential areas would impact the ability of flora and fauna to thrive in these areas.

SUNLIGHT ... whilst it is undeniably true that you can't beat Wellington on a good day, Wellington's residents live here every day of the year. On not 'good' days we are obliged to hunker down in our accommodation and metaphorically weather the storm. But on the 'good days' we can open our windows and welcome in sun, warmth and air. Allowing streetscapes of unrelenting high-rise development would curtail that opportunity to welcome the pleasant day and will make our dwellings permanently reliant on artificial heating and humidity management to avoid the "cold mould" problem. Obviously, this will come at permanent financial cost (capital and expenditure). Rather than treating all sites/locations as equal; the District Plan should accommodate a blended mixture of high-rise and low-rise to facilitate sunlight swathes across suburbs with higher height limits only at the south-eastern end of local environments (roads, suburbs, hillsides, etc.). The remainder of this submission is verbatim from Live Wellington, and I support it 100%.

Financial impacts of loss of sunlight were a concern raised by several submitters, who felt that this would cause property values to decrease as sun is a highly sought-after factor when purchasing a home. Several submitters who were not opposed to intensification or development generally did express a desire to see a more nuanced or case-by-case approach as opposed to blanket rules, to ensure that existing properties are not impacted too greatly.

The draft District Plan needs modification so as to provide a far more nuanced and careful consideration of issues such as light, shading, wind, privacy, design quality, retention of green areas, character and heritage.

A couple of submitters felt that consent should be required from neighbouring properties that will lose sunlight before a multi-storey building can be built.

Loss of character

25 comments

Concerns about increased building heights impacting the character and feeling of areas around Wellington were raised by a moderate number of submitters, who argued that tall buildings will detract from the unique architectural style and diminish the general feeling and sense of community that exists currently.

Allowing buildings six floors and over doesn't make sense. Wellington is famous for its traditional architecture. Allowing taller buildings will detract from that.

Loss of privacy

15 comments

Loss of privacy due to intensification was a concern for several respondents, who felt that as it stands currently, The Plan does not adequately consider how to preserve people's personal privacy as housing densifies.

General opposition to increased building height

10 comments

Several submitters made general comments opposing proposed new building height rules, arguing that they did not want 6 storey buildings in residential areas but rarely giving detail around why they felt this way.

Protect Wellington's heritage and charm

75 comments

A sizeable number of submitters expressed concerns about The Plan's potential impact on the city's heritage and unique charm. These submissions all echoed a similar sentiment – that the small-scale heritage homes around Wellington are what makes the city so unique and appealing, and that this character and charm will be irrevocably altered if 6 storey buildings are built in residential areas. Over half of these comments referred specifically to Mt Victoria, which, as one of Wellington's oldest suburbs, is highly valued by submitters for its unique character and charm.

The irreversible loss of character and history through the uncontrolled demolition of heritage buildings - we're not building on the Town Belt or other greenspaces as they have intrinsic value, so why are we prepared to lose character areas with their intrinsic value?

A considerable number of submissions referenced the pre-1930s demolition rule, arguing that this rule plays a vital part in retaining city character and should be reinstated. One submitter stressed the point that this rule is not to inhibit development, but simply to ensure that the demolition of heritage homes is not done lightly. They went on to state:

...if the approach in the DDP is taken now and applied immediately, there will be no looking back. Heritage/character, while often subjective, cannot be reinstated, whereas expansion for housing needs can be increased at a later stage.

A substantial number of submitters were also concerned about protecting Wellington's heritage and charm, but were more welcoming of the idea of development with many acknowledging that there is a need for more housing in the city. These submitters acknowledged the importance of protecting the city's heritage buildings, but felt a more considered approach should be taken to this rather than applying (or removing) blanket rules like the pre-1930s demolition rule.

Important Historical and Cultural Heritage should be protected, but only when they have a significant value for the city. This shouldn't be used as a cover for NIMBYism. We have some important sites we need to protect and emphasize. But we also have some derelict buildings which have absolutely no value for the city or Wellingtonians. We can't protect a building under the only pretext that it's old.

Other comments on intensification

40 comments

General comments

15 comments

Other submissions that expressed concerns about the impact of development or intensification made a variety of points that did not fit into any of the above topics. This included: general opposition to the idea of increasing Wellington's population; calls to spread intensification and population growth throughout Greater Wellington rather than focusing so heavily on Wellington City; concerns about the inter-generational conflict caused by discussions about intensification and the housing crisis and the way these have been framed by Council and the media; and, concerns about the "free market", or "unplanned" approach of The Plan that encourages "haphazard" development and appears to favour developers over residents and communities.

Questioning the number of houses required

25 comments

A considerable number of submitters questioned the number of homes needed in Wellington and claimed that figures included in The Plan are inflated.

Several submitters questioned WCC's population growth figures, noting discrepancies between the figures provided by Stats NZ and WCC, or noting that these figures were calculated prior to the COVID-19 pandemic. These respondents felt that changes to the way people live and work since the pandemic have not been considered, and that growth figures are likely to be lower than what WCC is forecasting:

The Covid Pandemic has changed the way we work and play. Many people have moved away from Wellington to small country towns to live and work – often remotely thanks to improved internet access. Many more people are working from home and their home suburbs are reaping the benefits of increased profits for local coffee shops, restaurants and other small businesses. Our suburbs are becoming micro hubs of social and business activities and fewer people are travelling to the city to work.

A small number of other submitters argued that changes should be introduced more gradually as needed, rather than pre-emptively, fearing that The Plan as it currently stands may result in unnecessary development which will negatively impact existing homes and residents.

A small number of submitters also raised the point that with many apartments being built in the CBD, the proposed level of intensification in the suburbs, particularly Mt Victoria, will be less necessary to meet the future population needs of Wellington.

A similar number of submissions stated that the focus should be on developing under-utilised land to meet housing demands before changing development rules in areas where people already live.

Rural, Commercial, City Centre, Medium Density, and Mixed-industrial Zones

750 comments

Summary

A very large number of submissions discussed matters relating to Rural, Commercial, City Centre, Medium Density, and Mixed-Industrial Zones. Comments mostly related to The Plan's proposed new height limits and over a quarter of comments argued The Plan should implement the Government's Medium Density Residential Standards. These approximately 200 submissions were received through A City for People and also supported the removal of height limits in the City Centre Zone.

A sizeable number of comments suggested a strategic and sequenced approach to intensification beginning with underutilised commercial or industrial land. A further theme emerged in a sizeable number of comments which noted Wellington's topography requires a more nuanced approach to intensification to avoid adverse effects such as loss of sunlight, views, amenity and character, and shading, wind tunnelling.

Medium Density (MRZ)

280 comments

A variety of comments were made about medium density zoning.

A very large number of submitters argued that the District Plan should be consistent with Government's Medium Density Residential Standards, including approximately 200 submissions received through A City for People, which stated:

I believe the District Plan must have further consistency with the Government's new Medium Density Residential Standards by applying at least as enabling height-to-boundary standards to 4+ story multi-unit housing.

A substantial number of submitters had concerns about proposed zoning changes, or general concerns about medium density zoning. Those who had concerns about medium density zoning generally worried that this level of development would impact the liveability of existing residential areas due to loss of character, sunlight, privacy, or overall amenity. These views have been discussed above on page 37.

Those who expressed concerns about specific proposed zoning changes mostly called for areas that have been rezoned as CCZ to be zoned as MDRZ instead. These comments have been discussed above on page 30.

Several submitters expressed support for increased medium density zoning around Wellington, believing that this will help alleviate the pressure of the housing crisis and make Wellington a more accessible place to live. A small number of these submissions specified that they support medium density zoning in some areas, but not others where existing properties will be negatively impacted. A couple of others expressly stated that The Plan should go further and allow for more medium density development throughout the city.

Central City Zone (CCZ)

270 comments

Building heights in the CBD

205 comments

A very large number of submitters expressed support for increasing building heights in the CBD, deeming this an effective way to increase the housing supply in Wellington without overly impacting the city's suburbs.

Approximately 200 submissions were received on this topic through A City for People, part of which stated:

I support removing maximum height limits in the City Centre Zone to enable more housing in a compact city centre, and to comply with the National Policy Statement on Urban Development.

A few submitters offered broad support for increasing building heights in the central city, while a small number of others called for the removal of maximum building heights in the CBD altogether.

Suggestions about zoning

20 comments

A moderate number of submitters had concerns about the boundaries and transitions between different zones and areas. The main concern raised by this group was the impact of having 28.5m high buildings in the CBD next to smaller-scale residential buildings in adjacent suburbs, particularly Mt Victoria and Thorndon. Several of these submitters suggested incorporating a transition zone between the Central City Zone and Medium Density Residential Zones, or simply opposed the rezoning of certain areas or streets to CCZ.

As the Central City Zone (CCZ) allows for buildings 28.5 metres high without a resource consent consideration needs to be given to the impact this would have on adjacent suburbs. There is a need for a transition zone between the CCZ and adjoining Medium Density Residential Zones (MDRZ). For example, incorporating the area Kent Terrace, Home and Hania Streets into the CCZ could result in a high 'wall' of buildings blocking Mount Victoria from the city. A better approach is to treat this as a transition zone between the city and the suburb, allowing medium density development (up to 6 storeys) in this zone – this would be achieved if it remains part of the suburb of Mount Victoria.

I would respectfully submit that the area around Hobson Street in Thorndon should be amended to be a medium density residential zone with character protection... Hobson is a small street and wouldn't be able to hold the infrastructure necessary (like new water pipes, parking, etc.) to become part of the CBD. It makes sense to extend the CBD North on Thorndon Quay, but not include Hobson Street.

Commercial

10 comments

Several submitters made comments relating to commercial activity in Wellington. These included support for the lack of non-port-related office activities in the harbour port precinct, and a very limited opportunity for commercial activities; concerns about a particular shop potentially selling age-restricted goods to minors (not directly related to The Plan); and a call for more shops in Newlands.

A few submitters wanted to see Te Ngākau/Civic Square or the Civic Centre revitalised, and not made available for private development. One submitter wanted to see height limits increased or removed in the commercial area of Wellington's CBD to encourage more people into the city.

Central city character and liveability

10 comments

A small number of submitters expressed concerns about heritage and character being diminished in the central city. These submitters focused on particular areas that have been rezoned as central city, including Hobson Street, Hobson Crescent, Katherine Avenue, Turnbull Street and the Eastern side of Murphy Street.

It is very important for the city to retain the older historical parts of the city to create a sense of history and uniqueness for future generations and for tourism.

A small number of submitters felt that more green space or open space is needed in the city centre, especially as the population density grows and more people move into the CBD. Note that this topic is

covered above under the heading 'Natural environment values', in which a sizeable number of submitters speak to this topic in relation to Wellington city more broadly.

Affordable housing in the central city

5 comments

Submissions that touched on affordable housing in the central city argued that more needs to be done to ensure that housing in the city is affordable and accessible to a diverse range of people and so that the city retains its unique and artsy character.

It is imperative creatives have to be able to access affordable housing in our city and especially making the central city desirable and inviting counts on our creatives being close by. If this is not accounted for the success stories this city has produced such as 'Flight of the Conchords' who have attributed their time in Wellington to their creative process, we risk losing our crucially important 'artsy' status and the lifeblood of our city – its creative contingent. A focus on the arts is the only way to keep the heart of our city beating. Events and creatives draw in visitors to our city and their role is important and can't be undervalued.

One submitter noted that some formerly commercial buildings in the CBD have been converted into emergency housing, and argued that public servants and hospitality professionals would love the opportunity to live in the CBD to reduce their daily commute but cannot currently afford to do so. This submitter notes that it would make more sense to house vulnerable community members elsewhere and utilise opportunities for residential development to provide affordable housing options for those who work in the city.

Brownfield sites in the CBD

5 comments

Focusing on developing brownfield sites within the CBD was an approach favoured by a small number of submitters, who felt that things like car yards do not need to be in the central city and could be moved elsewhere to make room for housing development which will lessen the impact on existing low-density residential areas.

The CBD has many sites taken by car-sales yards or carparking and development of these should be incentivised before any incursion into areas of current low-density residential use. It may be that permission to build higher will release some of these sites, but economies of scale may work in reverse and these sites remain in the landbank when infill townhouse developments are more profitable.

Moving workers out of the CBD

2 comments

Two submitters discussed the opportunity to decentralise government employment and encourage more workers to work outside the CBD to lessen the carbon intensity of commuting between home and the central city.

Other central city comments

5 comments

Other submissions relating to the central city included two offering general support for the District Plan's approach to the central city, including prioritising building more homes over protecting heritage buildings; one suggesting that the CBD should be the initial focus of development before intensifying in the suburbs; one urging The Plan to acknowledge that Wellington is in the midst of a housing crisis and prioritise the building of many more homes in the CBD; and one suggesting that soundproofing and double glazing requirements be introduced in the central city zone to mitigate noise issues in high-density areas for the future.

The consideration of making soundproofing and double-glazing requirement in new builds in the central zone to mitigate noise issues in high density areas for the future i.e. future proofing so these already prevalent issues are not exasperated considering this is also a high use area for concerts

and hospitality venues. The ideal outcome is that these businesses and central city residents are able to exist in harmony.

Timing and sequencing

90 comments

A considerable number of submissions – including approximately 80 in support of the submission by Live Wellington – called for WCC to take a more strategic approach to intensification instead of upzoning broad areas of land, starting by developing underutilised commercial or industrial land and making further zoning changes as required in the future. These submissions stated that The Plan needs to set out a clear sequence for intensification and use zoning appropriately, noting that this sequence ought to be aligned with the sequence set out in the Spatial Plan and must focus first on major areas of underutilised land and smaller groups of underutilised sites close to public transport.

Topography

85 comments

A sizeable number of submissions discussed Wellington's topography, most of which stressed the importance of planning and rules considering how the city's topography might impact development and the amenity of existing homes.

Issues with multi-storey buildings having the potential to block sunlight and views for existing homes, challenges around accessing steep, narrow streets, and general concerns about multi-storey buildings taking away the charm and liveability of Wellington's hilly suburbs were all offered as reasons why The Plan must take topography into consideration rather than imposing blanket rules that may work well in some areas (such as broad main thoroughfares) but not others.

In Newtown there should be more nuanced zoning between "centres" and "Medium density zones" that takes into account quality Urban Design principles as well as walkable catchment to BRT (See Red Designs work). There is a very crude circle around the central BRT bus stop at the moment that does not do enough to take into account topography, daylight and existing amenities. I would employ independent and talented urban design professionals mixed with local knowledge to do rigorous work for the district plan.

A moderate number of submissions specifically referenced infrastructure, noting that building resilient infrastructure to support a large increase in population on steep, unstable topography has proven challenging and appears not to have been considered.

Several submitters, while indicating that they also felt there should be a more site-specific approach to densification, felt that Wellington's topography allowed for the development of multi-storey buildings without having a negative impact on nearby homes.

Some areas due to topography are fine at 21m, for example where the current Regent St Housing is tucked up against the hill.

Industrial

40 comments

Submitters who discussed industrial land suggested that this land should be redeveloped to provide housing instead of upzoning residential areas. These submissions have been discussed on page 36.

Mixed use

27 comments

Several of the comments about mixed use zones expressed support for the idea of allowing both commercial and residential activity in certain areas, with around half of these submissions suggesting that The Plan should allow for more mixed use development, particularly of currently underutilised land and derelict buildings.

I support the proposed commercial mixed use areas, but do think these should be made larger and that more suburbs should have neighbourhood/local centre zones (e.g. Strathmore, Seatoun,

Lyall bay, in Brooklyn near Ridgeway School). It would make sense to have medium density housing around all of these centres.

Other comments about mixed use zones included calls to rezone certain areas to become mixed use zones, and the following comment:

Enable mixed-use development across the residential areas. As these areas intensify, there will be increased demand for retail and other commercial and community services. These need to be enabled close to where people will be living to create liveable, low traffic neighbourhoods. At the very least, mixed-use should be enabled on all corner sections.

Rural zone

7 comments

A small number of submitters made comments about rural zones. These varied and ranged from support for efforts to contain urban development and maintain amenity values in rural areas, to support for proposed rules to limit wild goat populations or requests for amendments relating to specific properties or areas.

Two submissions mentioned flood hazards, which have been discussed on page 24.

Two submissions were in relation to SNAs, which have been discussed on page 28.

Open space and recreation

7 comments

A small number of submitters made calls for increased open space, including for passive recreation, particularly as the population grows. A couple of these submitters stressed the importance of balancing the need for open space with the ability to build high-density housing in urban centres.

Other open space and recreation comments are discussed above, on page 27.

Summary

Two-thirds of the 300+ submissions to the Design Guides section were from the pro-forma A City for People submission in which sustainable, well-lit, high-amenity, and well-designed development was supported. Additional submitters expressed support for attention to aesthetics and amenity in planning and the design guides that underpin this.

A very large number of submissions were received about Design Guides. Out of those, a sizable number of submissions supported Accessibility and Universal Design requirements and incentives in City Outcomes Contributions. A substantial proportion of these comments supported the submissions made by Live Wellington and a few supported Parents for Climate Aotearoa's pro-forma submission.

Approximately 200 of these submissions were received through A City for People and expressed support for increasing the focus on creating accessible developments in Wellington. In particular, these submitters supported easier consenting and density bonuses for accessible developments, providing incentives for lifts in multi-story developments, and WCC working with Central Government to improve accessibility requirements in the Building Code.

A substantial number of submitters made suggestions about Design Guides. In order of most to least frequently mentioned, submitters discussed the following topics:

- Sustainability or resilience initiatives for new developments such as emergency water tanks for apartment buildings;
- The importance of sufficient and reasonable sunlight into homes and apartment and views and access to outdoor green space;
- More detail in Design Guides and/or making guidelines mandatory;
- Taking a place-based or granular approach to Wellington suburb neighbourhoods;
- Including more protections for character and heritage areas;
- Having a professional independent urban design panel as part of the consenting process;
- Adding mandatory communal spaces in new apartment buildings.

A considerable number of submitters were concerned about aesthetics and the integration of proposed developments into existing neighbourhoods. These comments addressed the implementation of architectural quality and urban design considerations with a view to ensuring the integrity of neighbourhoods' urban fabric is at least retained.

A moderate number of submitters supported either accessible or universal design standards in Design Guides. Several of those supported lifts in multi-storey buildings and a small number of those submitters proposed lifts should be mandatory.

Several submissions stated either full or partial support for Design Guides and a small number opposed either the Design Guides or assisted housing concessions. The remaining submissions made individual comments on a range of topics related to Design Guides.

Support for the Spatial Plan

213 comments

213 submissions received through City for People strongly supported enabling the full potential of the Spatial Plan in this District Plan.

CROSS BOUNDARY MATTERS

0 COMMENT

No submissions were received regarding this subsection.

RELATIONSHIP BETWEEN SPATIAL PLAN AND OTHER MATTERS

0 COMMENT

No submissions were received regarding this subsection.

Interpretation

70 comments

Summary

A substantial number of submissions commented on the Interpretation subsection in The Plan and submissions frequently made technical references. Out of all submissions to this subsection, about half supported The Plan's proposed definitions. Most of the remaining comments made individual comments about specified definitions and most argued this with supporting information. A small number of submissions also highlighted the need to align definition of terms with other relevant documents.

Definitions

67 comments

A substantial number of submitters commented on term definitions and over half supported term definitions. Support was frequently expressed through a confirmation statement by the submitter and supported term definitions were:

Airport purposes, accessory building, community facility, emergency service facilities, functional need, habitable room, hazardous substance, infrastructure, land disturbance, maintenance and repair, official sign, operational need, outstanding natural features and landscapes, quarry, regionally significant infrastructure, residential activity, residential building, residential unit, retirement village reverse sensitivity, sensitive activity, service station, structure, biodiversity offsetting, upgrading.

One supported The Plan's definitions of 'Green Infrastructure' and suggested a range of green infrastructure examples could be included. The same submitter also noted most green spaces, waterways and others also count as green infrastructure.

Greater Wellington Regional Council noted inconsistencies between definitions in The Plan and those in the Proposed Natural Resources Plan (PNRP). It was stated that the definition 'Hydraulic neutrality' needs to align with Proposed Natural Resources Plan's definition, and 'Well-functioning urban environment' needs to align with the definition in the Regional Policy Statement. Additionally, they suggested a definition for water-sensitive design (which is aligned with the PNRP) should be included in The Plan.

Several submitters sought inclusion of a definition: Fire and Emergency New Zealand wanted 'temporary emergency services training activity' to be defined and suggested a definition which:

means a temporary activity undertaken for the training of any component of Fire and Emergency New Zealand for any emergency purpose. "An emergency purpose are those purposes which enable Fire and Emergency New Zealand to achieve its main functions under sections 11 and 12 of the Fire and Emergency New Zealand Act 2017.

CentrePort Ltd requested “bulk fuel transfer” needs to be included in the ‘Operation Port Activities’ definition to allow this activity to occur at Burnham Wharf, Miramar.

Another submitter proposed the addition of a new definition for ‘Customer Connection’ and suggested it:

means a line that connects a telecommunications or electricity distribution network or a pipe that connects a gas distribution network to a site, including any connection to a building within that site, for the purpose of enabling a network utility operator to provide telecommunications, electrical services or gas services to a customer.

Various other new definitions were proposed in The Plan, including:

Accessibility, National Grid, National Grid Subdivision Corridor, National Grid Yard, Pest, Radiocommunication, and Rapid Transit. It was suggested ‘Hazardous Facility’ should also be defined and the definition taken from Major Hazard Facilities Regulations 2016.

Transpower noted they will supply details as to the requirements around the definition for ‘National Grid Substation Yard’.

Several submitters requested amendments. These included: specific text changes to ‘Ground Level’; the ‘Additional Infrastructure’ definition is unclear and gas distribution networks are already defined in Infrastructure; the ‘Cabinet’ definition needs to include ‘gas distribution enclosure’; the RMA definition of ‘Network Utility Operator’ needs to be added to The Plan’s definition; and that the definition of ‘Regionally significant Infrastructure’ needs to include ‘gas distribution networks’. One submission to this subsection commented that the current definition of ‘Upgrading’ considerably limits necessary upgrades and proposed an amended definition as follows:

As it applies to infrastructure, means the improvement, relocation, replacement or increase in carrying capacity, operational efficiency, size, pressure, security or safety of existing infrastructure, but excludes maintenance, repair and renewal.

Several other comments requested amendments to the following term definitions:

Airport purposes, Character, Renewable electricity generation activity, Root protection area, Temporary activities, Wind farm, Yard based retail.

A few submitters sought clarification on various points. CentrePort Ltd noted ‘Port Activities’ is defined twice which may lead to confusion, and sought clarification about how the definitions of ‘Commercial Port’ and ‘Port’ apply, suggesting location names should be added.

Another submitter sought clarification on service station retail activities, particularly if retail sale of fuel by service stations “falls under the definition of a commercial activity”. A final comment sought clarification for ‘Yard Based Retail’.

Two submitters cited spelling errors or omissions in Plan definitions (Light Industrial Activity, Natural Hazard).

Two other submitters opposed definitions (Ancillary Transport Network Infrastructure, Coastal Environment).

Lastly, one comment was submitted by Foodstuffs requesting a table should be added to The Plan to clarify the hierarchy of activities applicable to their operations.

National Direction Instruments

National Policy Statements and New Zealand Coastal Policy Statement

1 comment

One submission was received under this topic which focused on the boundary between Height Control Areas. It emphasised the need for "Understanding and implementing intensification provisions for the NPS-UD", stating that local authorities should "Utilize features such as streets, open spaces and schools as boundaries to transition between zones of differing densities" and to "avoid split zoning across blocks to reduce the potential for interface effects between zones of differing scales/uses". They stated that in the inner suburbs of Mt Victoria, Mt Cook, Newtown, and Kelburn these directives are frequently violated and the boundary between Height Control Areas 1 and 3 frequently cuts across blocks. The proposed recession planes at these boundaries have unfortunate consequences, particularly for middle lots in blocks. An example was given and a suggested remedy which was to expand the 11m Height Control Area to include any middle lots. This would give a measure of sunlight access protection to dwellings on middle lots.

NOTE: A significant number of comments were received in general sections which commented on the NPS-UD. These comments have been included in the section above, under the title National Policy Statement on Urban Development, on page 9.

Tangata Whenua

5 comments

The five comments below were made on the topic of tangata whenua, which have also been included in the wider discussion of tangata whenua on page 10.

Tangata Whenua: General

2 comments

Two submissions were made on tangata whenua generally. One submission noted that the development of iwi/hapū management plans is needed, while another called for more action in engaging and empowering tangata whenua, stating:

Even though I personally do not whakapapa to this rohe, I agree with the proposal to elevate the presence of tangata whenua within Whanganui-a Tara. This intention must go much further than simply reflecting culture and traditions in urban design and development. If WCC is going to enable tangata whenua to exercise their kaitiaki role over sites of significance, why are they not being allowed to take charge in Shelly Bay?

Recognition of Iwi and Hapū

1 comment

One submission expressed support for the changes to the District Plan to reflect the special role mana whenua can and must play in shaping the future of Wellington City, and felt that The Plan demonstrates a commitment to upholding Te Tiriti o Waitangi. The submission also states that the Council should show its commitment by identifying opportunities to return Council-held land to mana whenua.

Environmental Outcomes

No submissions were received regarding this subsection.

Other Tangata Whenua comment

1 comment

One submission called for the District Plan to retain the current mana whenua chapter and consider actively creating space for developments led by mana whenua.

Hapū and Iwi Planning Documents

No submissions were received regarding this subsection.

Summary

Submitters sought simple, reliable access to the Plan to make their submissions. Some criticised the complexity of the engagement software and others felt The Plan's parts were too detailed in order for them to make a submission in reasonable time. Some wished for the submission period to be longer. There was a desire for Council to consider and respond to submission appropriately. The functionality of the engagement software was criticised by some.

A moderate number of submitters raised technical problems incurred while using the online submission form or commented on other topics related to The Plan's consultation. Several submitters criticised the volume and complexity of The Plan which made submissions time-consuming, or complained about the unreasonable timing and short consultation period.

Several submitters made a variety of individual comments on WCC's consultation process. Of those, a small number of submissions discussed the need for Councillors to be open-minded when reading submissions. Others noted that many citizens are excluded from consultation due to lack of access, resources, opportunity, or information, suggested The Plan needs refinement, or asserted WCC's consultation is a numbers game rather than 'real' citizen or community participation. Two were critical about the language or wording used in The Plan.

A small number of submitters found the interface clunky or difficult to use, had difficulty submitting documentation or stated links or tick-boxes were not functioning. A few submitters expressed concern about the adequacy of the interface or transparency of consultation process, especially in consideration of the importance and impact The Plan will have on Wellingtonians and the city itself.

A small number of submissions were critical about past consultation experiences. Generally, these submitters expressed feeling ignored, powerless, or cut off by WCC and conveyed that this, on top of the proposed significant changes, created anxiety and stress for individuals and whole communities. Disappointment was voiced by one submitter who stated Councillors had previously disregarded council staff's proposed amendments for the Spatial Plan. The wish for submitters to be heard and actively included in the city planning and shaping is expressed in the following comment by one submitter:

You are not the city's masters but its servants. May I also remind you that you will receive this time, as you did last time, many considered submissions from the city's citizens who have thought carefully about how to make Wellington a liveable city while increasing its population.

Two submitters discussed positive points about the consultation process: one about the consultation drop-in session in Newtown, and the second submitter praising the support received from a WCC employee during the submission process.

Remaining submissions discussed individual topics related to the consultation process.

Part 2 District-Wide Matters

About the submissions on Part 2

- Eight hundred and five submissions were received on Part 2 of The Plan.
- Respondents could provide more than one submission, which resulted in submissions being received from 118 submitters: individuals (81), organisations (28), government (3) or local government (2) submitters.
 - The 91 individuals provided 171 submissions
 - The 32 organisations provided 269 submissions
 - The 3 government organisations provided 14 submissions
 - The 2 local government organisations provided 351 submissions
- Note that submitters often commented on one section regarding aspects taken from another part, for example provided a submission on strategic direction while making specific points regarding provisions. For added clarity, in some instances submissions have been discussed in the more appropriate place.
- The discussion that follows is ordered by the sections, sub-sections and provisions of the plan.
- Where no submissions were received on a particular section or sub-section this has been identified.

Strategic Direction

126 comments

Overall summary

A large number of comments were received on the Strategic Direction section. A good proportion of submitters had diligently read subsections and provisions and proposed specific text changes or amendments, and a small number requested more clarity in wording.

The importance of and appreciation for the natural environment was emphasised, in particular the protection of indigenous flora, whether this was through recognition of tangata whenua, strategic city planning or on a direct and private level.

A second key theme which appeared in two subsections expressed concern about the potential loss of character in Wellington streets or neighbourhoods resulting from the proposed changes to character overlays.

PURPOSE AND CONTEXT OF THE STRATEGIC DIRECTION

0 COMMENTS

No submissions were received regarding this subsection.

Anga Whakamua – Moving into the future (AW)

3 comments

Summary

Submitters were supportive of the partnership between WCC and tangata whenua.

Anga Whakamua – Moving into the future: Introduction 2 comments

Both submissions supported the WCC partnership with tangata whenua, with one observing that tangata whenua views would bring benefits to all.

Anga Whakamua – Moving into the future: Strategic Objectives 1 comment

One submitter suggested the cultural aspirations of Tangata Whenua in AW-O2 (*The relationship of Tangata Whenua with their Lands and Traditions...*) should be clearer.

Capital City (CC)

9 comments

Summary

The Capital City subsection was generally supported by all submitters with all but one proposing specific text changes.

Capital City: Introduction 7 comments

A small number of submissions commented on the Introduction of this subsection. All submitters proposed specific text changes.

Capital City: Strategic Objectives 2 comment

One submission stated full support for the objectives in this subsection, while another proposed specific text changes.

City Economy, Knowledge and Prosperity (CEKP)

11 comments

Summary

This subsection of The Plan was generally well received but the majority of submissions proposed specific text changes to objectives, and in two instances changes were sought to define provisions more clearly.

Knowledge and Prosperity: Introduction

2 comments

Two submitters proposed specific text changes to paragraph two of the Introduction of the City Economy, Knowledge and Prosperity subsection.

Knowledge and Prosperity: Strategic Objectives

9 comments

Several submissions discussed this subsection. Two-thirds of the submitters proposed specific text changes to either parts or all objectives; two of those submitters also requested definitions be included in CEKP-O2 (*Hierarchy of centres*) and clarified throughout the text. A further two submissions showed general support for provision CEKP-O4 (*Land protected from activities*).

A single submission expressed support for all the strategic objectives of this subsection.

Historic Heritage and Sites and Areas of Significance to Māori (HHSASM)

20 comments

Summary

Submissions emphasised the importance of historic heritage and character, generally advocating for stronger controls to protect and maintain character. Submissions pertaining to specific policies or suggested amendments to identified protected areas are discussed in the Historic Heritage section starting on page 21.

Historic Heritage: General

5 comments

A small number of submissions were made discussing general historic heritage, a few of which were detailed and lengthy. Two submissions supported the distinction made between character and heritage housing in The Plan and articulated the need for a stronger focus on protection of Māori culture and heritage. Another submission advocated for the inclusion of mana whenua in planning processes, especially for sites of significance. They also argued WCC should reinstate the rule requiring resource consent for the demolition of pre-1930 buildings to avoid loss of character. Another submitter agreed the value and identity held in character sites, streets and areas by residents should be acknowledged in The Plan and demolition be regulated by WCC to avoid loss of character and developments with inadequate or no character.

Additionally, they argued that retaining existing rather than demolishing buildings reduces landfill and is better for the environment. In a similar vein, one submitter suggested demolished timber buildings be

replaced with timber ones to retain “the existing carbon emitting city footprint”. To control this a resource consent process should be retained for building removal.

Natural Environment (NE)

30 comments

Summary

Comments to this subsection generally reflected submitters’ desire to protect the natural environment. This became evident through the moderate number of submitters who took time to read provisions and proposed specific text changes, the small number who clearly stated a wish for more protection of indigenous flora or fauna, or general support for The Plan regarding Significant Natural Areas.

Natural Environment: General

5 comments

A small number of submitters responded with general comments to the Natural Environment subsection. Three made calls for more provisions focused on sustainability, with one suggesting zoning rules to require developers to provide shared recreational and green spaces, and that water harvesting be mandatory in new buildings. Another stated indigenous plants should be protected and illegal to remove and only mana whenua be allowed to trim for cultural purposes. The submitter further argued for more indigenous trees in the CBD. A third submitter expressed general support for The Plan but had concerns about lack of clear rules or guidance on freshwater outcomes and felt that inappropriate Three Waters infrastructure is leading to worsening water quality.

Two submissions focused on SNAs, with one commenting on the lack of information on practical management of SNA’s on private land and requested the scheme be removed, while another objected to the proposed SNA at their address due to concern about the site’s reduced commercial value.

Natural Environment: Introduction

17 comments

A moderate number of submitters commented on the introduction of Natural Environment. Several submitters proposed specific text changes and a small number simply stated ‘agree’ with either a part or the whole introduction. Another submission requested a provision to protect protection for taonga birds, lizards and other indigenous species from introduced species.

Natural Environment: Strategic Objectives

8 comments

A small number of submissions discussed points regarding the strategic objectives of Natural Environment subsection. A few submitters proposed specific text changes while two supported the direction of SNA provisions of The Plan. Two specifically supported NE-O1 (*The natural character, landscapes and features, and ecosystems that contribute to the City’s identity...*) and its wording while another suggested linking the Strategic Objectives with each other. A final submitter argued the wording should reflect a more stringent approach to water quality.

Strategic City Assets and Infrastructure (SCA) 20 comments

Summary

Most comments relating to the Strategic City Assets and Infrastructure subsection consisted of specific text changes to provisions and were therefore detailed and relevant to infrastructure providers such as Transpower. The overarching theme in submissions addressed the practical aspects of planning, maintenance, and operation of infrastructure utilities. It was notable that only one submission identified green spaces as a strategic city asset.

Strategic City Assets and Infrastructure: Introduction 1 comment

One submitter commented on the Introduction of the Strategic City Assets and Infrastructure subsection and supported the Council's intention to encourage green infrastructure.

Strategic City Assets and Infrastructure: Strategic Objectives 20 comments

A moderate number of submissions commented on the Strategic Objectives in the Strategic City Assets and Infrastructure subsection. Several proposed specific text changes to objectives SCA-O1 (*Infrastructure aims*), O2 (*New urban development supported by infrastructure*), O3 (*Additional infrastructure*), O4 (*Adverse effects of infrastructure*) and O5 (*Infrastructure operation and protection*). Two of those comments and one other also explicitly expressed support for several objectives (SCA-O1 – O5). Two of the supporting comments were from Transpower and sought a specific amendment to SCA-O4 (*The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits...*) protecting infrastructure from being compromised by future development. Additionally, Transpower suggested a new objective specific to the National Grid to give effect to the National Policy Statement on Electricity Transmission. The final submission expressed concern about the capacity and capability of Three Waters infrastructure to cope with current residents, let alone an additional 80,000.

Sustainability, Resilience and Climate Change (SRCC) 20 comments

Summary

The submitters who commented on the Sustainability, Resilience and Climate Change subsection mainly sought clarifications to provisions, proposed specific text changes, advocated for a stronger emphasis on green spaces or green buildings, or focused on points relating to climate change. Overall, submitters were concerned about climate change and its effects and some expressed support for ecological strategies.

Sustainability, Resilience and Climate Change: General 5 comments

A small number of submitters responded to the Sustainability, Resilience and Climate Change subsection in The Plan and comments received varied widely in topic, detail, and length.

One submission called for more 'explicit connections between biodiversity, climate change and hazards' to integrate objectives from the Aotearoa New Zealand Biodiversity Strategy 2020 to this subsection.

Another submission argued for a substantial increase in green spaces and vegetation in the city and a second submitter was concerned that urban sprawl combined with WCC's aim to encourage active and green transport would add to the city's public transport congestion. They proposed bike hire stations along public transport routes to reduce pressure on trains. A third submission stated support for an objective but it was unclear which objective. This submitter also suggested stronger emphasis on greener buildings, a commitment to renewable energy, and creating a circular economy which included recycling demolition materials and creating jobs.

The fourth submission from The Architectural Centre (The Centre) was long and very detailed. This group supported housing density in suburbs and advocated design principles for welcoming, safe, and liveable neighbourhoods in Wellington. The Centre supported suburbs with greater density, saying:

Density does not have to mean ugly architecture. It can include improved biodiversity, tree planting and communal outdoor spaces. It cannot invite poor quality housing sold to property speculators and unethical landlords. It must include planning for a network of suburban services - in all suburbs, even those of the wealthy who currently happily drive to the supermarket on the other side of town.

The group's message included topics relating to sustainability, resilience, and climate change. Further points discussed in the submission were active and (1) green transport, (2) build form standards, and (3) street appeal. The group stated:

- 1.1 *Street parking is more efficient and safer than on-site parking and should be favoured.*
- 1.2 *Walkable neighbourhoods implemented by 2050.*
- 1.3 *Active and green transport is desirable and should be protected from motorists through legislation.*
- 2.1 *Limit building recession planes to backyard boundaries with a 6m setback to create back-back backyard rooms and provide daylight and privacy.*
- 2.2 *Re-introduce rule for 1.5m minimum front yards except for porches and bike shed doors.*
- 2.3 *Exclude un-excavated sub-floor spaces from height limits on sloped sites to reduce carbon production.*
- 3.1 *Aim for greater quantity of solid wall surface over voids (glazing) on street frontage and use energy efficient joinery.*
- 3.2 *Encourage tall windows for optimised sunlight harvesting.*
- 3.3 *Avoid small and space-inefficient balconies and replace with French doors or sliding doors fitted with an outside balustrade and modesty rails for privacy.*

Sustainability, Resilience and Climate Change: Introduction 5 comments

A small number of submissions commented on the introduction of the Sustainability, Resilience and Climate Change subsection. Two supported Objective SRCC-O1 regarding the built environment and simply stated 'agree'. The remaining submissions gave varied responses. One stated opposition to SRCC-O2 regarding natural hazard risks and requested the simplified terms such as 'planned for', and 'mitigated' need to be clarified and identification pathways provided. Clarification was also sought for SRCC-O3 (*development and land use activities*) by a second submitter for the term 'adapt over time'. This submitter also expected a stronger focus on proactive and pre-emptive approaches to climate change risks, which

should be reflected in the objective's wording. A final submitter proposed a more nuanced approach to new and current developments affected by natural hazard risks.

Sustainability, Resilience and Climate Change: Strategic

Objectives

10 comments

Several submitters commented on the objectives in the Sustainability, Resilience and Climate Change subsection. A few of those comments opposed either SRCC–O1 (*built environment*) or SRCC–O3 (*development and land use activities*) and took contrasting views. Two of those comments argued against the inclusion of statements relating to climate change or carbon emissions, denying the validity of human-induced global warming or sea level rise.

The third submitter called for more drastic action to lower carbon emissions immediately. A few submitters proposed specific text changes or amendments to clarify a meaning within an objective or add a specific point (SRCC–O1 to O3).

A few more submitters made individual comments on SRCC–O1 or O3, ranging from a request for clarification about practical management of risks and lack of supporting/linking references, particularly additional detail in the Design Guide for Subdivision (SRCC–O3); and the meaning of the term 'adapt over time'. Another suggested more 'stringent' measures for future developments and a more nuanced approach to hazard mitigation risks (SRCC–O1). A final submitter simply stated 'agree' to SRCC–O1 with no further elaboration.

Urban Form and Development (UFD)

14 comments

Summary

Several submitters commented on the Urban Form and Development subsection. Half of those proposed specific text changes or amendments to provisions, while a small number of comments expressed support for the subsection as drafted. A small number of submitters articulated their wish for more community-oriented living options or concern about loss of character in streets or neighbourhoods.

Urban Form and Development: General

6 comments

A small number of comments discussed ideas, suggestions and concerns relating to the Urban Form and Development subsection. Four of those submitters expressed support but raised suggestions to include in provisions or concerns regarding their suburb or city or specific text amendments. Provisions supported were 30% permeable surfaces, climate emergency actions, and infrastructure and housing developments in Mt Victoria. Among the proposed amendments were a provision for urban farms, Papakāinga, co-housing, and perimeter block housing. Three submitters, two of whom were otherwise supportive, expressed concern regarding lack of character-protecting provisions, general concern about residential housing quality and effect on community wellbeing, and lack of measures creating and supporting economic and social diversity.

One general comment made to the Urban Form and Development subsection opposed the proposed changes to Khandallah, particularly the village. The submitter rejected the introduction of a Rapid Transport System through the suburb, the intensification of the village, describing concern that services and infrastructure would not cope with proposed intensification.

Urban Form and Development: Introduction

2 comments

Two submissions discussed matters relating to the Introduction of this subsection. Both proposed specific text changes to paragraph one with no further comment.

Urban Form and Development: Strategic Objectives 6 comments

A small number of submitters commented on the objectives in the Urban Form and Development subsection. Four of those proposed specific text changes with amendments to UFD-02 regarding greenfield areas, O5 regarding a variety of housing types, and O6 regarding well-functioning urban environments. Fire and Emergency's suggested amendment regarded enabling urban development in greenfield areas "where it can be adequately serviced by three waters infrastructure." Another submitter proposed amendments and stated partial support for UFD-06, while a second submitter sought clarification of the term 'well designed'. A further submission also requested clarity around implementation of The Plan's proposed management of climate change and risks. A final comment opposed building and transport intensification to Thorndon, expressing fears about loss of character.

Overall summary

A very large number of submissions were received for the Energy, Infrastructure and Transport section. Submissions reflected support for most of the subsections, however, submitters frequently proposed specific text changes or amendments. Public utility companies provided comprehensive submissions offering concise but detailed suggestions to The Plan's provisions. Points repeatedly discussed included the need for a separated policy framework for the National Grid, ensuring provisions give effect to other relevant Policy Statements and regulations, for example regarding emergency vehicle access, and finally, support was expressed for prioritising micromobility use and on-site parking over on-site car parking.

Three Waters Infrastructure (THW)

39 comments

Summary

Overall, the subsection received strong support from submitters with constructive suggestions for the next phase of The Plan. Most of the considerable number of submissions regarding Three Waters Infrastructure supported the drafted provisions in this subsection, with some proposing specific text changes to rules R1, R2, and R3. A recurring topic in a small number of submissions was a concern about infrastructure capacity and ability to cope with population growth. A further concern raised was ensuring sufficient water flow and pressure for firefighting purposes.

Three Waters Infrastructure: General

3 comments

A few submitters made general comments regarding Three Waters Infrastructure in the Energy, Infrastructure and Transport section. One supported the proposed reforms regarding national ownership of Three Waters Infrastructure and hoped for more efficient maintenance. The second submitter suggested 'true' hydraulic neutrality should be aimed for using stormwater runoff at the undeveloped state as a ballpark figure. The final comment expressed concern that Karori's sewage is already at full capacity and requires urgent upgrades prior to any additional housing developments being consented.

Three Waters Infrastructure: Introduction

12 comments

Several submissions commented on the Three Waters Infrastructure subsection's Introduction. Two thirds of those submissions proposed specific text changes with amendments to paragraphs two, four, five, or six. A further three submitters expressed support for either paragraph two, six, or in general. One of those submitters argued for the value in stormwater in the city:

Stormwater treated as a taonga and retained to be used on the whenua as much as possible through the use of permeable paving and roading

A final submission focused on a similarly ecological context and expressed disappointment that the value of natural waterways was not recognised, arguing they should be treated as a Fourth Water.

Three Waters Infrastructure: Objectives

6 comments

A small number of comments were submitted relating to the Three Waters Infrastructure Objectives THW-O1 (Servicing and Capacity), THW-O2 (Infrastructure Enabled Use or Development), and THW-O3 (Hydraulic Neutrality). All but one of the comments proposed specific text changes to either O1 or O3 with no further elaboration. One submitter supported the objectives as proposed and a final comment submitted by Fire and Emergency expressed support for development addressed in O2, but highlighted the requirement for:

Sufficient or planned Three Waters infrastructure capacity or, where this is not possible, development can be satisfactorily serviced by other means.

Three Waters Infrastructure: Policies

10 comments

Several submissions were made relating to the Three Waters Infrastructure Policies, over half of which proposed specific text changes with suggested amendments. A further few submitters supported THW-P2 (Servicing) and either stated 'we agree' or reiterated the importance of Three Waters' Infrastructure having 'sufficient capacity'. A final comment proposed an extension to the 'Infrastructure Capacity' definition.

Three Waters Infrastructure: Building and Structure Activities

9 comments

Several submissions addressed matters relating to Three Waters Infrastructure's Building and Structure Activities. A small number of those comments proposed specific text changes to the Building and Structure Activities rules THW-R1 (Connection to Existing Three Waters infrastructure – New Residential Buildings), THW-R2 (Connection to Existing Three Waters infrastructure – New Large-scale Residential and Non-residential Development) or THW-R3 (Hydraulic Neutrality - New Large-scale Residential and Non-residential Development). The Fire and Emergency submission supported THW-R1.1a and THW-R2, but expressed concern about water flow and pressure for firefighting (THW-R2).

Infrastructure (INF)

74 comments

Summary

A substantial number of submitters commented on the Infrastructure subsection, with almost half of those expressing support for the provisions as they are drafted in The Plan. A further considerable number of comments proposed specific text changes or amendments. The subsection's comments were heavily represented by public utility companies who provided detailed and in-depth comments regarding their infrastructure as it is affected by The Plan. One frequently repeated statement proposed a separate policy framework for the National Grid. A second repeated theme highlighted The Plan's shortcomings to plan appropriately for emergency vehicle access to roads and driveways.

Infrastructure: General

5 comments

A small number of general comments were received for the Infrastructure subsection, two of which expressed support for either the structure of the subsection or general support for The Plan's infrastructure provisions. The latter comment was submitted by First Gas Limited and additionally included a small number of proposed amendments which related to the gas network, lines, or activities. The submission opposed Table 2-INF: Street Trees and sought amendments which specify permitted

excavation within the protected rootzone. This comment referenced the Auckland Unitary Plan standards as examples.

In their comprehensive submission, Transpower noted the multitude of provisions in this subsection which appear to include the National Grid but are not specific to it. Transpower considered the subsection does not give effect to National Policy Statement on Electricity Transmission (NPSET) and noted numerous shortcomings in the subsection relating to the National Grid. Transpower stated they seek:

A separate policy framework be provided for the National Grid which recognises and provide of the benefits of the National Grid, manages the effects of the National Grid, and the effects of other activities on the National Grid.

The Wellington International Airport Limited (WIAL) submission sought clarification on the subsection's applicability to the Airport Zone. Additionally, WIAL considered the Infrastructure subsection 'unwieldy, repetitive and in some instances too restrictive'.

Infrastructure: Introduction

7 comments

A small number of comments were submitted relating to the Introduction of the Infrastructure subsection. Over half of those comments proposed specific text changes to text in the Introduction. Out of these, two submitters sought amendments, with one proposing the National Policy Statement for Freshwater Management and New Zealand Coastal Policy Statement should be added to the list of additional regulatory requirements. Two submissions expressed support, one simply stated 'agree' to paragraph eight, while a further submission lodged by Transpower agreed to support the subsection on the condition:

That it articulates the importance of infrastructure and makes specific reference to the NPSET.

Infrastructure: Objectives

6 comments

A small number of submitters commented on the objectives in the Infrastructure subsection. Over two-thirds of those comments supported either INF-01 (benefits), O2 (Adverse effects of infrastructure), O3 (protection), O4 (availability) or O7 (Adverse effects of infrastructure). Transpower submitted on four Objectives, expressing support for all but one and requesting a separate suite of National Grid provisions (INF-01 to O3). Furthermore, a specific amendment relating to subdivision was proposed for INF-03 and clarity sought on how values will be recognised. The same clarification was also sought by Transpower for INF-07. A final and individual submission noted duplications in Objectives O2 and O7 and proposed a specific text amendment.

Infrastructure: Policies

18 comments

A moderate number of submitters responded to the policies in this Infrastructure subsection. A third of these specific comments were submitted by Transpower who indicated support for INF-P1, P3 to P7 and every comment also included the following statement:

in order to give effect to the NPSET, a specific National Grid provision is sought.

Furthermore, Transpower sought a range of specific text amendments or clarifications to terms within those same policies. A small number of comments were submitted by Powerco who similarly proposed specific text changes and amendments to: INF-P1 (*Recognising and providing for infrastructure*), INF-P4 (*Undergrounding*), INF-P5 (*Adverse effects of infrastructure*), INF-P7 (*Adverse effects on infrastructure*) relating

to their network and activities. Fire and Emergency submitted various comments, two of which supported INF-P1 (*Recognising and providing for infrastructure*) and INF-P2 (*Coordinating infrastructure with land use, subdivision, development and urban growth*) as drafted, while another proposed a specific text amendment for INF-P9 (*Upgrading and development of the transport network*) to ensure unhindered access to emergency vehicles.

Two comments were submitted by Meridian Energy, proposing specific text amendments to INF-P1 (*Recognising and providing for infrastructure*), and INF-P7 (*Adverse effects on infrastructure*).

The final three submissions were made by three separate parties. One responded to INF-P9 (*Upgrading and development of the transport network*), arguing wheelchair access should be given the same priority as pedestrians. Another submission in response to INF-P9 by Greater Wellington Council suggested a stronger emphasis on active and green transport being prioritised over parking, loading and vehicles. The final comment was a joint submission from Chorus, Spark and Vodafone who attached a separate table with their online submission for reference. The submission supported INF-P1 to INF-P5, however, also sought a specific text amendment to INF-P6 (*adverse effects of infrastructure*).

Infrastructure: Rules for Infrastructure - General 21 comments

Six different submitters offered a number of comments related generally to the Infrastructure subsection. These submitters (in order of highest to lowest number of comments) were: Transpower, Powerco, and equal comments by Fire and Emergency, Meridian Energy, The Fuel Companies, and finally, Chorus, Spark and Vodafone as a combined submission. In general, submissions were detailed and about a third provided clear and concise reasoning to their chosen position.

Over half of the comments expressed support for one of the Infrastructure subsection's provisions with a short confirming sentence (INF-R1, R3, R4, R5, R6, R11, R13, R14, and INF-P7 and P9) or proposed a specific text amendment to: INF-R1 (*Operation, maintenance and repair, or removal of existing above and underground infrastructure and ancillary vehicle access tracks*), INF-R15 (*New electricity lines and associated support structures (including poles and towers) that convey electricity of 110kV or above*), INF-R30 (*New roads and upgrading of roads*) and INF-R22 (*Subdivision in the National Grid subdivision corridor*), INF-R23 (*Earthworks in the National Grid Yard*) and INF-R24 (*Buildings, structures and activities in the National Grid Yard*). A small number of comments proposed specific text amendments with no clear indication of support or opposition to the provision.

Both Powerco and The Fuel Companies opposed the requirement in INF-R1 (*Operation, maintenance and repair, or removal of existing above and underground infrastructure and ancillary vehicle access tracks*) to remove redundant below-ground infrastructure within 12 months. Meridian Energy observed that it is unclear if R8 (*New infrastructure contained within existing buildings and Navigational aids, sensing and environmental monitoring equipment*) also applies to renewable electricity generation investigation facilities and stated it conflicts with the REG subsection. Further clarification was sought by the combined submission from Chorus, Spark and Vodafone regarding a link in R5 (*New aboveground customer connection line*). Furthermore, their combined submission opposed R6 (*Temporary infrastructure*) and proposed the 6-month removal period should be increased to 12 months.

Infrastructure: Standards 16 comments

A moderate number of submitters commented on the Infrastructure subsection's Standards. Submissions to this subsection were made by five different submitters: Transpower, Powerco, Fire and Emergency, The Fuel Companies, and a combined submission from Chorus, Spark and Vodafone. Over half of submitters proposed specific amendments to one of the following: S2 (*Underground infrastructure*), S3 (*Earthworks*), S4 (*Upgrading of Aboveground Infrastructure*), S5 (*New Aboveground Customer Connections*), S8 (*Height of telecommunication poles and associated antennas, lines and single pole support structures and*

meteorological masts), S12 (*Buildings, structures and activities in the National Grid Yard*), and S14 (*Design of Roads*). A small number of submitters directly expressed support for the following standards as drafted in The Plan: S1 (*Health and Safety*), S4 (*Upgrading of Aboveground Infrastructure*), S5 (*New Aboveground Customer Connections*), S6 (*Structures*), S9 (*Antenna Size*), and S10 (*Height of Antenna Attached to Buildings*).

Transpower's and Powerco's submissions were specific to electricity utilities. Notable comments included that amendments are sought to S3 (*Earthworks*) as it relates to the National Grid and that provisions must give effect to the National Policy Statement on Electricity Transmission. Further, a clarification of S2 (*Underground infrastructure*) was sought and a necessary terminology correction was highlighted for S6 (*Structures*). Powerco also proposed specific text changes to S6 (*Structures*) and S7 (*Riparian setbacks*) and a change to Table 2-INF: Street Trees, to increase the minimum distance from trees to underground utilities to 3m.

Fire and Emergency submitted three comments, all relating to fire truck access. Two of those comments sought a change to provisions S14 (*Design of Roads*) and S17 (*Connection to Roads – Driveways*) to widen both roads and driveways to 4m to ensure fire truck access in accordance with NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. A further comment relating to underground utility structures submitted by The Fuel Companies opposed S2 (*Underground infrastructure*).

Infrastructure – Coastal Environment (INF-CE) comments

56

Overall summary

A substantial number of comments responded to the Infrastructure – Coastal Environment subsection. About a third of those comments were submitted by public utility companies who offered comprehensive responses and proposed specific text changes to provisions. Several submissions stated support for specific provisions as drafted. A small number of comments opposed provisions relating to the National Grid, with Transpower reiterating its request for a separate policy framework for the National Grid.

Infrastructure – Coastal Environment: Policies – Infrastructure comments 25

A considerable number of submissions were received regarding the Infrastructure – Coastal Environment subsection. Generally, comments were concise and almost half the submissions simply stated 'agree' to a selected provision: INF-CE-P15 (*Operation, maintenance and repair of existing infrastructure within the coastal environment within areas of High Coastal Natural Character*), INF-CE-P17 (*Operation, maintenance and repair of existing infrastructure within the coastal environment in the Rural and Open Space Zones within coastal and riparian margins*), INF-CE-P19 (*Upgrading of existing infrastructure within the coastal environment that is located aboveground and outside an existing road reserve within areas of High Coastal Natural Character*), INF-CE-P22 (*Upgrading of existing infrastructure within the coastal environment of the Rural and Open Space Zones that is located aboveground and outside an existing road reserve within coastal and riparian margins*), and INF-CE-P23 (*New infrastructure within the coastal environment within areas of High Coastal Natural Character; or within coastal and riparian margins*).

One submitter in support also sought an amendment to the policy framework specific to the National Grid.

Several comments proposed specific text changes or amendments to: INF-CE-P14 (*Operation, maintenance, repair and upgrading of existing infrastructure and new infrastructure within the coastal environment - outside of areas of High Coastal Natural Character; and outside of coastal and riparian margins*), INF-CE-P16 (*Operation, maintenance and repair of existing infrastructure within the coastal environment in the Residential, City Centre, Waterfront, Mixed Use, General Industrial, Airport and Port Zones – within coastal and riparian margins*), INF-CE-P18 (*Upgrading of existing infrastructure within the coastal environment that is located underground or within an existing road reserve – within areas of High Coastal Natural Character*), INF-CE-P20 (*Upgrading of existing infrastructure within the coastal environment of the Residential, City Centre, Waterfront, General Industrial, Mixed Use, Airport and Port Zones – within coastal and riparian margins*), and INF-CE-P21 (*Upgrading of existing infrastructure within the coastal environment of the Rural and Open Space Zones that is located underground or within an existing road reserve – within coastal and riparian margins*). Two submitters requested clarifications to INF-CE-P19 (*Upgrading of existing infrastructure within the coastal environment that is located aboveground and outside an existing road reserve*) and whether it applies alongside or separate to the INF subsection, and one asked if INF-CE-P15 (*Operation, maintenance and repair of existing infrastructure within the coastal environment*) applies “in addition to the REG Chapter provisions”.

Infrastructure – Coastal Environment: Rules - Infrastructure

Activities

22 comments

A moderate number of submissions commented on the Infrastructure Activities of this subsection. Almost all comments were brief statements and over half of all comments proposed specific text changes with amendments. A small number of submissions stated they agree with one of three rules: INF-CE-R32 (*Operation, maintenance and repair of existing infrastructure within areas of high coastal natural character*), R35 (*Upgrading of existing infrastructure within areas of high coastal natural character*), and R36 (*New infrastructure within the coastal environment within areas of high natural character or coastal and riparian margins*).

A further three submissions were individual comments. Two comments sought clarity as to whether INF-CE-P23 (*New infrastructure within the coastal environment within areas of high coastal natural character within coastal and riparian margins*), INF-CE-R35 and INF-CE-R36 apply in addition or separately to the INF chapter and CE chapter provisions.

A final submitter noted infrastructure rules in Coastal Environment currently also apply to the Port Zone, hindering future port development.

Infrastructure – Coastal Environment: Policies - National Grid (NG)

& Gas Transmission Pipeline Corridor (GTPC)

7 comments

A small number of comments were submitted regarding the National Grid (NG) & Gas Transmission Pipeline Corridor (GTPC). Two comments sought an “amended policy framework specific to the Nation Grid” to INF-CE-P27 (*Operation, maintenance and repair of existing NG & GTPC infrastructure within the coastal environment of the Rural and Open Space Zones – within coastal and riparian margins*) and one of the submitters further noted a duplication in INF-CE-P27 and INF-CE-P26.

Two further submissions opposed INF-CE-P28 (*Upgrading of existing National Grid infrastructure within the coastal environment – within areas of High Coastal Natural Character; or within coastal and riparian margins*) and INF-CE-P31 (*New NG & GTPC infrastructure within the coastal environment – within areas of High Coastal Natural Character; or within coastal and riparian margins*) as they do not give effect to the NPSET. The remainder of submissions made requests regarding deletion of policy applying to the Nation Grid and that the comments from Infrastructure Activities rules also be applied in the INF-CE Rules.

Infrastructure – Coastal Environment: Rules - National Grid (NG) Gas Transmission Pipeline Corridor (GTPC) 2 comments

Two submissions commented on the National Grid (NG) Gas Transmission Pipeline Corridor (GTPC) in this subsection. One proposed specific text changes and amendments regarding the National Grid while the second submitter commented “apply comments on rules from Infrastructure Activities”.

Infrastructure – Ecosystems and Indigenous Biodiversity (INF-ECO) 5 comments

Summary

A small number of submissions were received relating to the Infrastructure – Ecosystems and Indigenous Biodiversity subsection. Most comments related to technical details in the provisions and all but one comment opposed a particular provision. Half of those argued The Plan’s provision should either give effect to the relevant National Policy Statement or refer to the relevant regulations which provide for those activities.

Infrastructure – Ecosystems and Indigenous Biodiversity: General 1 comment

One submitter commented on Ecosystems and Indigenous Biodiversity in general and opposed The Plan’s approach to SNAs which affects their private property. The submitter described restricted usage of their garden and complained the overlay devalues their land. Furthermore, they stated WCC’s suggested approach to and controls for SNAs are counterproductive to nurturing indigenous vegetation, and that the identification process of SNA land requires a review and alignment with ‘real’ significant vegetation.

Infrastructure – Ecosystems and Indigenous Biodiversity: Policies 1 comment

One submitter commented on the policies of this subsection. They opposed policies INF-ECO-P34 (*Operation, maintenance and repair of existing NG infrastructure within a Significant Natural Area*), INF-ECO-P35 (*Upgrading the National Grid within Significant Natural Areas*) and INF-ECO-P36 (*New development of NG within Significant Natural Areas*), arguing they do not give effect to the NPSET.

Infrastructure – Ecosystems and Indigenous Biodiversity: Rules - National Grid (NG) Gas Transmission Pipeline Corridor (GTPC) 1 comment

One submission was received for the National Grid (NG) Gas Transmission Pipeline Corridor (GTPC). The submitter mainly argued INF-ECO-R45 (*Operation, maintenance and repair of existing NG & GTPC infrastructure within a Significant Natural Area*) and INF-ECO-R46 (*Upgrading of existing National Grid infrastructure within a Significant Natural Area*) should be deleted because National Environmental Standards for Electricity Transmission Activities Regulations 2009 provide for those provisions. Additionally, the submission supported discretionary activities in INF-ECO-R48 (*New NG & GTPC infrastructure within a Significant Natural Area*).

Infrastructure – Ecosystems and Indigenous Biodiversity:

Standards

2 comments

Two submitters commented on INF-ECO-S21 (*Earthworks within a Significant Natural Area*) in this subsection. One opposed S21 and requested it should be deleted while the second comment sought an amendment to S21 and clarification of its relation to infrastructure in general.

Infrastructure – Natural Features and Landscapes (INF-NFL)

7 comments

Summary

A small number of submissions were received on the Infrastructure – Natural Features and Landscapes subsection. Just over half expressed general support for provisions set out in the subsection, all of which proposed specific text changes or amendments. The remaining few comments opposed either a single provision or the complete subsection.

Infrastructure – Natural Features and Landscapes: Policies

2 comments

Two submitters suggested changes to provisions. The first comment opposed: INF-NFL-P47 (*Operation, maintenance and repair of existing NG & GTPC infrastructure within Outstanding Natural Landscapes and Outstanding Natural Features*), INF-NFL-P48 (*Operation, maintenance and repair of existing NG & GTPC infrastructure within Special Amenity Landscapes Ridgeline and Hilltop Areas*), INF-NFL-P50 (*Upgrading of existing aboveground NG and GTPC infrastructure outside an existing road reserve within Outstanding Natural Landscapes, Outstanding Natural Features, Special Amenity Landscapes or Ridgeline and Hilltop Areas, outside of the coastal environment*), INF-NFL-P51 (*Upgrading of existing infrastructure within Outstanding Natural Features and Outstanding Natural Landscapes*), INF-NFL-P52 (*New NG & GTPC infrastructure within Outstanding Natural Landscapes, Outstanding Natural Features, and within the coastal environment*), and INF-NFL-P53 (*New NG & GTPC infrastructure within Outstanding Natural Landscapes, Outstanding Natural Features, Special Amenity Landscapes or Ridgeline and Hilltop Areas, outside the coastal environment*), and noted concern that these policies do not give effect to the NPSET. The submitter proposed an amended policy framework specific to the National Grid.

The second submission suggested amendments should be made to INF-NFL-P40, INF-NFL-P42, INF-NFL-P44, and INF-NFL-P46 to allow necessary infrastructure within special or outstanding landscapes not in the Coastal Environment which “does not need to avoid all adverse effects”.

Infrastructure – Natural Features and Landscapes: Rules -

Infrastructure activities

2 comments

Two comments were received for Infrastructure activities in the Natural Features subsection. Both comments proposed amendments to policies INF-NFL-R50 (*Upgrading of existing infrastructure within the Special Amenity Landscape or Ridgeline & Hilltop area*), and INF-NFL-R53 (*New infrastructure within a Special Amenity Landscape or Ridgeline & Hilltop area*) to enable upgrades inside infrastructure enclosures.

Infrastructure – Natural Features and Landscapes, Rules - National Grid (NG) Gas Transmission Pipeline Corridor (GTPC) 1 comment

One submitter commented on three rules regarding the National Grid (NG) Gas Transmission Pipeline Corridor (GTPC) in the Natural Features and Landscapes subsection. The submitter supported INF-NFL-R57 (*new infrastructure in special landscapes outside the coastal environment*), proposed specific text amendments to INF-NFL-R58 (*new infrastructure in special landscapes within the coastal environment*), and requested INF-NFL-R55 (*upgrading of infrastructure within special landscapes*) be deleted.

Infrastructure – Natural Features and Landscapes: Standards 2 comments

Two comments discussed INF-NFL-S22 (*Earthworks*) and opposed the drafted subsection. One sought clarification on how the standard relates to infrastructure in general.

Infrastructure – Natural Character (INF-NATC) 5 comments

Summary

A small number of submissions were received on the Infrastructure – Natural Character subsection. Most comments expressed support for the drafted subsection's provisions, however, just under half of submitters also proposed specific text changes.

Infrastructure – Natural Character: Policies 2 comments

Two submitters commented on policies in the Infrastructure – Natural Character subsection. One proposed specific text changes to P54 (*Infrastructure within riparian margins*) and the second submitter opposed the policy on the basis that it does not give effect to the NPSET. The submitter sought “an amended policy framework specific to the National Grid”.

Infrastructure – Natural Character: Rules 3 comments

A few comments related to rules in the Infrastructure – Natural Character subsection. Two submissions expressed support for R59 (*Infrastructure within riparian margins outside the Coastal Environment*) while the third submitter proposed specific text changes and amendments to this provision.

Summary

A moderate number of submitters responded to the Infrastructure – Natural Hazards subsection. Submissions contained detailed and reasoned arguments to their views and a majority were submitted by public utility companies. Over half of the comments supported selected provisions and a small number of submitters proposed specific text changes, amendments or sought clarifications to the text or definitions in provisions.

Infrastructure – Natural Hazards: General

1 comment

One submitter made a general comment on the Infrastructure – Natural Hazards subsection. They noted the rules' unfavourable restrictions on port activities and sought clarification on this subsection's Objectives and Policies regarding how port activities interact with Infrastructure provisions.

Infrastructure – Natural Hazards: Policies

2 comments

Two submissions supported the policy regarding infrastructure and structures in natural hazard overlays. One submitter simply stated 'agree' while the second offered a longer reasoning for their support.

Infrastructure – Natural Hazards: Rules for Infrastructure – Natural Hazards

16 comments

A moderate number of submitters discussed Natural Hazards and overlays in their comments. Apart from one submission, all others were concise, varying from simply stating 'agree' to copying the provision text and inserting amendments. Half articulated support for various rules in the subsection, namely: INF-NH-R60 regarding new and existing underground infrastructure, INF-NH-R62 regarding temporary infrastructure, and INF-NH-R63 regarding new above ground infrastructure. One of those submitters also requested a specific amendment to R63.

A few submissions proposed specific text changes with amendments to INF-NH-R60, R61 (regarding maintenance of exiting aboveground infrastructure) and R62. Clarifications were sought by two submitters, one for a word and the other for a term definition in INF-NH-R60. Two submitters argued groundwork for underground services could be carried out without exacerbating existing hazards and therefore sought amendments to the rules (R60, R61, R62 and R63).

A final submitter expressed concern about earthquake risk to tall buildings on Kent and Cambridge Terraces.

Summary

A moderate number of comments were submitted to the Infrastructure – Other Overlays subsection. About two-thirds of those supported selected provisions and a small number of those supporting submissions proposed specific text changes or amendments. Submissions were thorough in their discussion of technical details contained in the provision.

Infrastructure – Other Overlays, Policies

3 comments

A few submitters responded to the policies in the Infrastructure – Other Overlays subsection and all proposed specific text amendments. One of those submitters further requested clarification on areas subject to P56 (*Adverse effects of infrastructure*) in relation to the power network.

Infrastructure – Other Overlays, Rules for Infrastructure – Other Overlays

21 comments

A moderate number of submissions commented on the Other Overlays subsection. Over half clearly stated their support for a rule: INV-OL-R64 (*Maintenance or upgrading of existing underground infrastructure*), R65 (*New underground infrastructure*), R66 (*New aboveground customer connection lines*), and R69 (*New aboveground infrastructure and temporary infrastructure in Other Overlays not otherwise provided for*) and a few of those also proposed specific text amendments to some rules (INV-OL-R64 – R69). All amendment proposals were simple text insertions without elaboration. Several submissions proposed amendments to rules and most of them followed a similar format of inserting short text into The Plan's provisions. A few of those further included short comments such as 'support', 'support in part', or 'oppose' to part of a provision and only one submitter explained the reasons for the amendment. The final two comments consisted of proposals for specific text changes.

Renewable Electricity Generation (REG)

17 comments

Summary

A moderate number of comments related to the Renewable Electricity Generation subsection and over half of those supported selected provisions. The majority of comments proposed specific text changes or amendments to provisions. Meridian submitted the most comments by a single submitter on provisions as they related to their utility infrastructure. Most comments about this subsection were detailed and of a technical nature.

Renewable Electricity Generation: General

3 comments

General comments were made regarding the Renewable Electricity General (REG) subsection. One submitter argued the interaction between provisions in the REG subsection and those in Coastal Environment, Infrastructure, and Infrastructure – Coastal Environment subsections are unclear and require clarification. The second comment submitted by Wellington International Airport Limited (WIAL) proposed provisions in this subsection should enable local and community-scale renewable energy projects in the Airport Zone rather than restrict this activity with a discretionary status.

The submission from Meridian raised a minor difference in the RMA wording and the slightly more limited approach to renewable energy in The Plan. Meridian suggested:

The text should probably be amended to acknowledge this possibility. It is important that the framework of policies and rules enables solar as well as wind energy generation at larger than small scale.

Renewable Electricity Generation: Objectives

2 comments

Two comments were submitted by Meridian relating to REG-O2 (*Adverse effects of renewable electricity generation activities*) and O3 (*Adverse effects on renewable electricity generation activities*). In both instances Meridian proposed specific text changes, and specifically noted their support for 'the purpose and scope of REG-O2.

Renewable Electricity Generation: Policies

9 comments

Several comments were received for the Policies in the Renewable Electricity Generation subsection, all from Meridian. Meridian proposed short and specific text changes or amendments to REG-P1 (*Recognising the significance and benefits of the use and development of renewable energy*), P3 (*Enabling existing renewable electricity generation activities*) and P10 (*Large scale renewable electricity generation activities in the General Rural and Natural Open Space zones*). They sought term definition clarifications for P14 (*Repowering of existing large scale wind farm activities*) and clarity on how P15 (*Reverse sensitivity*) is given effect to through rules and how reverse sensitivities are avoided.

Other comments submitted related to P6 (*Small-scale renewable electricity generation activities and investigation activities within Overlays and the coastal environment*) and P7 (*Community scale renewable electricity generation activities in the General Rural, General Industrial and Natural Open Space zones*). Both noted The Plan made a considerable distinction between similar renewable electricity generation operations and raised that there was a:

difference in the policy considerations between small scale and community scale renewable electricity generation and it is not clear why that is.

Two further points discussed the merit of REG-P11 and argued renewable electricity generation should be enabled for areas such as Terawhiti, where 'quality of the wind resource is known to be suitable for generation'. In the final comments Meridian argued 'decommissioning' and 'remediation' covered in REG-P16 are addressed through the consent process and should be moved to REG-P2 (*Providing for renewable electricity generation activities*).

Renewable Electricity Generation: Land Use Activities 2 comments

Meridian argued the 30m height limit for anemometers in REG-S2 is not in line with other jurisdictions, and this should be increased to 80m in height. Meridian further noted REG-P5 (*Small scale renewable electricity generation activities and investigation activities within the coastal environment*) fails to give effect to the NPS-REG, and raised conflicts between some policies, rules, and standards in this subsection. In a second comment, Meridian discussed upgrading activities of existing windfarm structures and facilities, opposing REG-R5's (*Large scale renewable electricity generation activities*) classification of this activity as discretionary and seeking a change to a more enabling rule.

Summary

A considerable number of submissions commented on the Transport subsection, with a wide variety of focuses or views reflected in the comments. They ranged from short and detailed policy-specific submissions, such as the several who proposed specific text changes or the other several who stated support for provisions as they are drafted in The Plan. A small number discussed parking-related matters, with over half of those supporting the removal of on-site car parking and implementation of on-site micromobility parking. In a similar vein, the proposed Sustainability Transport Hierarchy received support from a few submitters.

Transport: General

7 comments

Several general comments were made addressing One submitter supported the proposed 'Sustainable Transport Hierarchy', however, they noted accessibility should be considered the top priority on this hierarchy. The second submission from Wellington's Character Charitable Trust was detailed and substantive, arguing the Johnsonville train line does not qualify as a rapid transit service and therefore its walkable catchments should be considered as Medium Density Residential with a height limit of 6+ storeys. Another couple of submitters also argued for a lower height limit within 5-10 minutes of Rapid Transit Routes and especially the Johnsonville Line.

Three submitters discussed parking-related matters. Two of those submissions expressed support for the removal of on-site carparking and provisions which provide on-site micromobility parking, while the third submitter advocated for resident parking in their Newtown street.

The final comment was submitted by Wellington International Airport Limited (WIAL), who sought clarification on a few reclassified roads in proximity of the airport. WIAL requested clarity on the implications or changes this may produce.

Transport: Introduction

4 comments

A few submitters responded to the Introduction of the Transport subsection. Two submitters expressed support for The Plan's proposed 'Sustainable Transport Hierarchy'. A third submission proposed specific text changes to paragraph four.

Transport: Objective

2 comments

Two submitters proposed specific text changes to TR-01 (*Purpose*) which included the on-site parking facilities for mobility scooters to the Provision.

Transport: Policies

7 comments

A small number of submitters responded to The Plan's Transport policies. Over half of those submitters proposed specific text changes with no further commentary to TR-P1 (*High trip generating use and development*) and P3 (*Managed activities*). Another two submitters sought clarification on the wording in TR-P2.2. (*Meet the reasonable demands of site users*), and requested 'reasonable demands' should be clarified. The final comment questioned if the rising use of cargo, passenger and e-bikes had been considered in the subsection, particularly their dimensions and charging facilities.

Transport: Land Use Activities

7 comments

A small number of submitters commented on Land Use Activities in the Transport subsection. Over half of those stated their support for either R3 (*On-Site Cycling and Micromobility Paths*) or R4 (*On-site Vehicle Parking and Manoeuvring*), with one of these expressing support for no minimum or maximum on-site carparking requirements. The remaining two comments were submitted by The Fuel Companies and Z, both of which sought clarification on TR-R2.1.b.ii. (*Trip Generation and its applicability to existing service stations*). The following quote explains both companies' inquiry:

Z seeks to clarify whether Rule TR-R2.1(b)(i) relates to changes to existing operations, maintenance and upgrades of existing service stations. Z does not consider it is appropriate to require resource consent for trip generation purposes for changes to existing operations, in particular where operations, maintenance and upgrades will not change the number of trips generated to / from an existing activity.

Transport: Activity Standards

11 comments

Several submissions commented on the Activity Standards of the Transport subsection. Over half of those made short statements agreeing with a specific Standard (TR-S2, S3, and S7). A small number of submitters proposed specific text changes to standards: TR-S4 (*On-site Pedestrian, Cycling and Micromobility Paths*) and S8 (*Provision of on-site loading areas*).

The final submission sought clarification on TR-S7 (*Design requirements for on-site vehicle parking, circulation and manoeuvring*) about which technical standard The Plan refers to. The submitter proposed specific text changes and amendments to ensure safety conditions will be retained when vehicle access or crossing points to a site are changed.

Table 7 – TR to Table 10 TR

0 comments

No submissions were received regarding these provisions.

Hazards and Risks

33 comments

Summary

A considerable number of submitters commented on the Hazards and Risks section which was received with general support as well as frequent proposals for specific text changes to provisions. Most submitters were stakeholders or interested parties to assets affected by hazards and risks and this was reflected in concise and specific commentary and responses to the proposed provisions.

Contaminated Land (CL)

4 comments

Summary

A small number of comments related to the Contaminated Land subsection. Most comments indicated general support and either proposed specific text changes or amendments. Comments were concise and specific and reflected professional knowledge about relevant hazards and risks discussed.

Contaminated Land: General

2 comments

Two submissions discussed general matters regarding contaminated land. One supported the absence of rules in this subsection and stated that it:

avoids unnecessary duplication with other comprehensive legislation which effectively controls and manages these activities.

Another submitter proposed specific text changes to reflect stronger focus on land remediation of contaminated land.

Contaminated Land: Objectives

1 comment

One submitter voiced general support but specifically agreed with CL-O1 (*Protection of human health from contaminants*) and CL-P3 (*Management of contaminated land*).

Hazardous Substances (HS)

4 comments

Summary

A small number of submitters commented on the Hazardous Substances subsection and were evenly split between general support, albeit with some proposed specific text changes, and opposition to specific provisions. Comments were concise and specific and reflected professional knowledge about relevant hazards and risks discussed.

Hazardous Substances: General

1 comment

One submitter rejected that WCC should control hazardous substances and their effects. The submitter argued:

The Resource Legislation Amendment Act 2017 (RLAA) removed the explicit function of district and regional councils to control the adverse effects of the storage, use, disposal or transportation of hazardous substances under sections 30 and 31 of the Resource Management Act 1991 (RMA).

Hazardous Substances: Objectives

2 comments

Two comments were made on the objectives of Hazardous Substance subsection, both were in support of the objectives and proposed specific text changes. One comment related to HS-O1 (*Protection from residual risk*) and suggested that unacceptable residual risk should be avoided only, while the second comment proposed the avoidance rather than minimisation of reverse sensitivity in HS-O2 (*Protection of established facilities*).

Hazardous Substances: Policies

1 comment

One submission voiced support for the absence of rules in this subsection and discussed two Hazardous Substances Policies. HS-P1 (Residual risk to people and communities) was opposed by the submitter while specific text changes were proposed for HS-P2 (Location of hazardous facilities and activities).

Natural Hazards (NH)

25 comments

Summary

A considerable number of comments were submitted for the Natural Hazards subsection, which was generally supported by over half of submissions with the addition of specific text changes by several submitters. Most comments submitted originated from stakeholders such as Wellington International Airport Limited, Earthquake Commission or public utility companies. The professional interest by those entities was reflected in concise and specific comments about relevant natural hazards to their activities, services and utilities. Topics discussed included fault lines, Natural Hazard provisions on the Airport Zone, flood hazards, and support for engineering standards of resilience.

Natural Hazards: General

8 comments

Several submissions commented on Natural Hazards in general and ranged in length from two sentences to several pages long. Comments varied widely in themes and included fault lines, specific effects on the Airport Zone, flood hazards, mitigation responses, and a detailed list from The Earthquake Commission (EQC). Two submissions proposed specific text amendments, one acknowledging the side-effects of hard-engineering mitigation responses and the second requested a note which states hazard modelling has only been undertaken for parts of the district.

One submission specifically supported The Plan's risk-based approach taken to hazard management. Wellington International Airport Limited (WIAL) noted airport activities are inadvertently affected by the subsection's overlays and proposed Airport activities and their emergency services should be exempt from general provisions and the definition of 'hazard sensitive' in this subsection.

A further submitter sought the deletion of risk levels from Liquefaction Hazard Overlay and proposed The Plan should acknowledge 'existing significant investment and built development', and the economic and social benefits from investment in CBD in The Plan's Coastal and Hazards Overlays.

One submitter commented on this subsection in general but with specific reference to their neighbourhood's erosion caused by flooding. The submitter argued significant damage to private property in their street (Willowbank Road) during flooding within the last six years has been exacerbated

by new developments in 'the upper Porirua Stream catchment' and therefore opposed any further developments in this area.

The final submission was provided by EQC and expressed support for a few provisions in the subsection. The detailed submission provided valuable suggestions such as the following:

A landslide hazard susceptibility map and/or risk map to be developed and included as a land instability overlay in the District Plan, with associated policies.

EQC further proposed specific text and table changes and additions, such as including wind and wildfires as hazards. Furthermore, EQC sought clarification on the terms 'significant risk' and 'fault hazards'.

Natural Hazards: Introduction

2 comments

Two submissions commented on the Introduction of the Natural Hazards subsection. Transpower's submission supported parts of the final paragraph about risk, however, sought clarification as to whether the natural hazard objectives and policies apply to infrastructure. The second comment opposed the inclusion of their address on Westchester Drive in the flood ponding overlay.

Natural Hazards: Objectives

6 comments

A small number of comments were collected for the objectives in the Natural Hazards subsection. Two-thirds proposed specific text amendments and half of those advocated the use of engineering standards of resilience as guidelines to future-proof future developments (NH-O1 – *Risk from Natural Hazards*). The other half made short additions to NH-O2 (*Planned Hazard Mitigation Works*), while the remaining third of comments simply stated 'agree'.

Natural Hazards: Policies

6 comments

A small number of submitters responded to the Policies in Natural Hazards and two thirds proposed specific text changes. Out of these half suggested small text variations (NH-P6, NH-P15) while the other half either sought assurance that flood waters will not be diverted onto adjacent land (NH-P7 and NH-P8) or expressed support for NH-P15 and P22 but proposed to include 'co-benefits for ecosystem restoration/enhancement and climate change mitigation and adaptation'. The remaining third of overall submitters in this subsection's provision commented 'agree' in response to NH-P15.

Natural Hazards: Rules

3 comments

A few submissions discussed matters relating to Natural Hazards rules. Two of those submitters proposed specific text changes with no further elaboration to NH-R4 (*Additions to all buildings in the Ponding Area, Overland Flowpath or the Stream Corridor*). The third submission, from The Fuel Companies, expressed support for NH-R4 and R11 (*Hazard Sensitive Activities in the Ponding Area of the Flood Hazard Overlay*) as these two rules allow minor upgrading and maintenance work to take place.

Historical and Cultural Values 25 comments

Overall summary

The Historical and Cultural Values section was supported by the majority of submitters. An emerging trend revealed strong support for the protection of heritage buildings and sites in Wellington city. The pre-1930s demolition rule especially received frequent support and those submitters proposed it should be reinstated. Although the Sites and Areas of Significance to Māori subsection received the most comments and supporting comments in this section, most did not specifically relate sites or areas of significance to Māori. The Notable Trees and Viewshafts subsections both gained general support from the small number of submitters who commented on them.

Historic Heritage (HH)

18 comments

Summary

A moderate number of comments were made on the Historic Heritage subsection, the majority of which called for greater protection to protect various areas from loss of character. This included extending character overlays, strengthening rules, and specific additions or amendments to the heritage list.

Historic Heritage: General

15 comments

The majority of general comments advocated for greater protection of heritage. Two submitters requested the re-instatement of the pre-1930s demolition rule, while one felt The Plan required more clarity about the demolition of pre- and post-1930 buildings and contended that demolition in Mount Victoria should require a resource consent.

A submission by the New Zealand Archaeological Association Incorporated suggested demolition should be a non-complying activity. They expressed general support for the subsection, however, advocated for greater protection of archaeological sites and rejected the separate treatment of Māori heritage and other built heritage, arguing they both provide similar ancestry links.

Several submissions referred to specific protected areas. One noted the Design Guide does not contain any detail about the Civic Centre Heritage Area or significance, and the list of protected buildings needs to be amended to include the Wellington Central Library. Another felt the Civic Square should have the same protections as Heritage buildings.

One submission noted amendments are required to include and identify all current Historic Heritage Reserves in The Plan, while one submitter requested two sites be added to the heritage list. This submitter also commented 8 Winchester Drive needs to have the burial site marked out to avoid disturbance. Bolton Street Cemetery and Wellington Botanic Gardens should be listed as culturally protected features according to one submission.

Another submission argued that Schedule 1 needs to be amended to exclude the Athfield Addition of 143 Lambton Quay. Generally, this submitter supported historic heritage objectives and rules which enable the maintenance, repair and reasonable works, but objected to heritage controls where only the building exterior is considered.

One submission asked that streetscapes in inner city suburbs which have been established around turn of the century should be preserved for their character value, while another requested heritage area overlays for Thorndon, Mount Victoria and Berhampore be reinstated.

Two submissions wanted a Willis Street property to be removed from the heritage list, while another urged the WCC to remove their Mt Victoria property from Schedule 1 heritage list as it is no longer applicable.

Historic Heritage – Cross references to other relevant District Plan provisions

2 comments

Two submissions related to cross references to other relevant plans, provisions or documents. One was concerned about the removal of Character or Heritage Overlay which they felt would lead to streets losing character and existing residences losing sunlight and outlook. For adequate overlay zones the submitter referred to the Boffa Miskell Report. Another submitter supported cross references to other provisions.

Historic Heritage: Policies

1 comment

One submission suggested WCC offer reduced or waived property taxes to owners of heritage buildings or structures for retaining them on their original site.

Notable Trees (TREE)

4 comments

Summary

A small number of submissions related to the Notable Trees subsection, which received overall support. Half of the submitters sought greater protection of notable trees than The Plan proposed and specific text changes were proposed by half of respondents.

Notable Trees: General

2 comments

One submitter showed general support for the Notable Trees subsection. Some specific text changes were proposed for TREE-P2 (*Protecting Notable Trees*), an inconsistency was noted between TREE-P2 and TREE-R1 (*Trimming and pruning of notable trees*), and the implementation of TREE-S2 (*Emergency trimming or pruning work*) in a real-world scenario was questioned.

One submission requested greater protection of trees, especially in Newtown. Furthermore, the submitter suggested all notable trees should be named and listed and new developments should be required to limit impermeable surfaces.

Notable Trees: Objectives

2 comments

Two submissions expressed support, one of which agreed with the entire subsection. The second submitter supported the objectives but requested greater protection of notable trees and an accompanying larger list in SCHED6-Notable Trees. The submitter also proposed specific text changes to TREE-O3 (*Maintaining Notable Trees*).

Sites and Areas of Significance to Māori (SASM)

14 comments

Summary

The Sites and Areas of Significance to Māori subsection was generally well received by most submitters, though most did not specifically reference significance to Māori. The objectives in particular gained strong support, however, a few general but detailed and long submissions opposed the subsection and argued for more stringent heritage protection.

Sites and Areas of Significance to Māori: General

3 comments

A few submitters commented generally on the Significance to Māori subsection, all stating they wanted greater heritage protection measures in The Plan. Two of those submissions were long and detailed; the first submitter had considerable experience in the field of heritage and advocated for stronger heritage protection of residential buildings and discussed the lack of a clear approach to heritage evaluation within the whole city. The submitter argued the current and proposed Plans are 'permissive' and enable city development over heritage value. The second long submission specifically related to Mount Victoria and called for the reinstatement of the pre-1930s demolition rule, questioned the value of 'Design Guides', opposed height exemptions for assisted housing developments, and advocated for the current operative provision which guarantees reasonable sunlight hours into buildings. The third submitter expressed concern about the current and operative Plan's heritage rules affecting their property and highlighted the expense and time attached to owning a heritage building under The Plan.

Sites and Areas of Significance to Māori: Introduction

6 comments

Several comments responded to the Introduction of this subsection and one third of those supported paragraph six. Two submitters said paragraph five requires clarification through improved grammar. One submission proposed specific text changes to paragraph four while the final comment opposed the idea that sites cease to exist as is implied in paragraph four.

Sites and Areas of Significance to Māori: Strategic Objectives

4

comments

The objectives in this subsection gained strong support and most of the small number of submitters evenly split their support between HHSASM-O1 (*Purpose*) and HHSASM-O2 (*Protecting Sites and Areas of Significance to Māori*). The fifth submission simply agreed with the Sites and Areas of Significance to Māori subsection.

Summary

A small number of submitters commented on the Viewshafts subsection, with general support expressed by three-quarters of those. Submitters raised two points: a requirement for laymen's terms for greater accessibility of The Plan, and how existing intrusions should be addressed.

Viewshafts: General

2 comment

One submitter commented on the Viewshafts subsection and voiced support for parts of VIEW-P3 and VIEW-R1 which allow limited / minor intrusions into view shafts. Another comment offered general support, but suggested the language would be more accessible if it was in laypersons' terms.

Viewshafts: Introduction

1 comment

One submission was received for the Introduction of the Viewshafts subsection and only text changes were proposed.

Viewshafts: Policies

1 comment

One submitter shared their concern about existing intrusions into viewshafts and commented The Plan does not provide policy or rules about dealing with this.

Natural Environment Values 201 comments

Overall summary

A very large number of comments were received for the Natural Environment Values section. Within these, there was a strong thread of opposition for The Plan's proposed Significant Natural Areas (SNAs). Many of these opposing comments noted their support for the intent of SNAs but cited loss of usable garden or outdoor space, cost for resource consent and ecologist report and felt their private property rights were being encroached on. Among the short submissions a range of specific text changes were proposed throughout the section and two amendments suggested.

Ecosystems and Indigenous Biodiversity (ECO)

89 comments

Summary

A sizeable number of submissions were received for the Natural Environment Values subsection and well over half of those discussed Significant Natural Areas (SNAs). Of those comments, over half opposed The Plan provisions and cited loss of usable garden or outdoor space, cost for resource consent and ecologist report and felt their private property rights had been invaded. A general sense of indignation and anger was communicated in many submissions. A third of those opposing comments indicated support for the general idea behind SNAs but not in the proposed form and its effects on private property. A considerable number of submissions expressed support for various provisions while a small number proposed specific text changes.

ECO Ecosystems and Indigenous Biodiversity: General comments

27

A moderate number of submissions related to the proposal of significant natural areas (SNAs). Two-thirds of these submissions voiced opposition to the current proposal in The Plan, five were relatively neutral and four noted their support.

About half of the opposing submissions expressed strong language and the sentiment that WCC overstepped their mark and was affecting private property rights, land grabbing or devaluing property. An example of such a comment follows:

We ask that you cease and desist, we insist on retaining kaitiakitanga over our own privately owned properties.

Two submitters threatened to remove indigenous plants before SNAs come into effect. The perceived loss of freedom of choice and reduction in property value was suggested to be compensated by WCC by one submitter buying back their 'valueless' section. Another comment suggested a compensation scheme for affected landowners be set up by WCC to cover extra costs incurred.

One submission discussed the SNA overlay will have on their private property and was concerned about its effects on development potential. Another submitter suggested an alternative framework be set up by

WCC to deal with SNA provisions, while a further submission proposed specific text amendments to allow more activities on SNA land.

Further topics raised multiple times included the definition of 'significant', with one observing this has not been defined in the RMA and its interpretation is therefore ambiguous, or questioning whether the overlay covered any bush of significance as identification had only happened through aerial photography. A small number of comments felt the consultation process for the development and location of SNAs was flawed and at least two stated they had not been contacted. Closer consultation with property owners which could result in a true collaborative approach between WCC and private landowners was suggested as a desirable alternative by a few submitters.

One submitter felt The Plan's implications makes maintenance of vegetation difficult:

Private landowners must be permitted to trim native trees on SNA land as required to protect daylight and view shafts so they can provide for their social well-being, without seeking consent from Council.

Further comments ranged from stating a link to the RMA had not been sufficiently established, that the legality of the Schedules referred to in the subsection do not meet the requirements of Policy 23, and that conservationist landowners who have planted, tended and protected indigenous flora and fauna would be penalised by the WCC instead of acknowledged and valued, or that legislation is required to stop neighbouring plantings in SNAs overshadowing or leading to bird droppings dirtying roofs and other areas.

A few comments expressed support for planting, maintenance and protection of indigenous flora but objected to the proposed approach in The Plan, which was considered dictatorial.

The small number of submitters who maintained a neutral stance regarding SNAs discussed specific word changes, or highlighted technical concerns such as an inconsistency in the effects management and Hierarchy between sections. One requested the benefits of non-indigenous vegetation as nursery plants to be acknowledged and included and a third asked for clarification on the applicability of Infrastructure Cross reference note.

The small number of submissions in support of SNAs are well reflected in the language of the following comment.

I think the idea of creating SNAs and protecting remnants of native forest environments, whether on public or private land is a great idea and am wholly supportive of it.

A wide range further of suggestions were made, such as engaging independent ecologists to act as a neutral individual between WCC and landowners. Other comments offered ideas such as specific text or reference changes to some provisions, adding additional protection for flora from invasive plants or grazing animals (goats), that WCC fund a programme which assists with the physical removal of exotic vegetation, or rate reductions for SNA overlay land.

Ecosystems and Indigenous Biodiversity: Introduction³ comments

A few submissions related to the introduction of the Ecosystems and Indigenous Biodiversity subsection. Two were generally supportive, however, one of those expressed concern about the accuracy of the overlay delineation and WCC's ability to maintain SNAs. The second submitter requested that links between other biodiversity and natural values in the city should be made clear in The Plan. The third submission objected vehemently to The Plan's SNA proposal as they felt it would turn their nurtured land into a 'liability' that WCC would take control of.

Ecosystems and Indigenous Biodiversity: Objectives 12 comments

Several comments were made regarding the objectives in Ecosystems and Indigenous Biodiversity. Over half of those agreed in general or stated their agreement for a particular objective. Objectives O1 (*SNAs are protected from inappropriate use*), O2 (*SNAs within the coastal environment are protected*), and O4 (*SNAs are maintained or restored by mana whenua in accordance with kaitiakitanga*) received a small number of comments, with half of those suggesting proposed specific text changes. One opposed the restrictions to subdivision in ECO-O1 and stated ECO-O4 should only apply if permission by property owner is granted. Another sought clarification regarding a cross-reference in ECO-O4. The two final comments suggested a new objective be added to this subsection, one to improve water quality in waterways and another to protect biodiversity outside SNAs overlays.

Ecosystems and Indigenous Biodiversity: Policies 24 comments

A moderate number of submitters commented on policies in this subsection and two thirds supported the drafted provisions. Out of the two thirds, just over half were in broad agreement with the intentions to protect SNAs but most also proposed specific text changes or amendments. Two comments expressed agreement and reflect the conciseness of most positive submissions:

I agree with this, as a minimum standard of protection for Significant Natural Areas.

A further two submitters argued the designation 'significant' is inappropriate for the actual vegetation found on many sites and its application to privately owned land should be deleted.

A small number of submissions were in general support of the intention to protect SNAs but addressed the subsection's implementation according to the Regional Policy Statement Policy 23. The comments questioned the accuracy of interpretation or simply opposed the proposed wording.

A few comments opposed The Plan's provisions stating a variety of reasons. These included the need for resource consent and additional costs to landowners with SNA overlays, the limitations on subdivision, and cumulative impacts of residential coastal edge and SNA controls leading to severely limited use of land.

The remaining submissions suggested the addition of a new waterways policy and protections for indigenous biodiversity outside of SNAs to this subsection or asked specific questions regarding payment for ecologist services and growth rate of different indigenous species. Lastly, one expressed support for landowners and their protection and maintenance of indigenous flora and fauna but rejected WCC's approach to managing those areas of land. This submitter's comment is a good reflection of the general tone in many critical submissions,

"Supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of indigenous vegetation." THIS is what you should do with private land that you think has areas that need protecting and nurturing!! This is the way to get private property owners on your side with protecting the ecosystem.

Ecosystems and Indigenous Biodiversity: Land Use Activities 20 comments

A moderate number of submissions were received discussing rules as they relate to SNAs. Half of those submitters rejected parts of or whole rules in ECO-R1 (*Trimming or Removal of Indigenous Vegetation*) or R3 (*Restoration and Maintenance of SNAs*). The main reasons for concern were the incursion/invasion into private property rights and the cost and time involved with applying for a resource consent and

commissioning an ecologist report for essential gardening activities on private land. It was felt generally that WCC should cover incurred costs. The following comment is typical:

Not only does this add extra time and complication to doing simple things on your property, it adds considerable cost - especially if the council then deny the application! These costs are punitive. You are asking people to pay for resource consent and a report by an ecological expert. This is expensive and unfair. Council should cover these costs, not individual property owners.

A couple of submitters argued the ECO rules do not align with other national and regional directives such as housing density, guidance from fire and emergency, and healthy homes advice. Two submitters considered the rules to be short-sighted by not acknowledging the benefits of non-indigenous plants, with one suggesting a change to R2 (*Removal of Non-Indigenous (Exotic) Vegetation*) and another questioning how the planting of indigenous plants would work in practice since eco-sourced plants are not identifiable and/or available in garden centres.

The limitation on permitted trimming for light access into buildings was a further point of contention. The loss of private garden space to SNAs, including food production, and omission to allow critical services to be accessed within the overlay were also noted.

A small number of submissions simply indicated support for selected rules (ECO-R1, R2, R3, R5) by saying 'agree', while a few sought clarification on a range of rules. Clarity was sought for ECO-R1.1.v and whether this applied to private property, if the two-metre distance is measured from fence to trunk or foliage in ECO-R1.2, and why there is no rural zone in ECO-R4 (*Vegetation Clearance for the construction of a residential building*).

Ecosystems and Indigenous Biodiversity: Standards 3 comments

A few submitters commented on the standards in this subsection. Two commented on the limiting width of three metres of farm access tracks in the Rural zone. Both stated this contradicts national rules for rights of way and is inappropriate for working farm settings. The third comment noted the 'significant additional costs' ECO-S1 will incur to landowners.

Natural Character (NATC)

32 comments

Summary

A considerable number of submitters commented on the Natural Character subsection and expressed overwhelming support. Most comments were short statements such as 'agree'. A small number of comments either proposed specific text changes or suggested the control of wetlands should be separated from the National Environmental Standards for Freshwater 2020.

Natural Character: General

4 comments

A few comments were made relating to the Natural Character subsection in general. Two argued The Plan should control protection of wetlands separate to National Environmental Standards for Freshwater 2020. One of those submitters further proposed to rename the subsection while the third submission made specific text changes.

Another submitter expressed their interest in being involved in natural character assessments of riparian margins landwards of the coastal environment and noted that if no assessments take place this should be stated as such in The Plan.

Natural Character: Introduction 3 comments

One submitter repeated their earlier argument that The Plan should control protection of wetlands separate to National Environmental Standards for Freshwater 2020. This comment was submitted twice, once regarding paragraph one and then paragraph three in the introduction. The third comment proposed specific text changes to paragraph of the Introduction.

Natural Character: Cross references to other relevant District Plan provisions 1 comment

One submitter commented on Cross references to other District Plan provisions in support.

Natural Character: Objectives 5 comments

A small number of submissions expressed support for either NATC–O1(Natural character or O2) (Customary Harvesting). All comments were short statements of either 'agree' or 'I support this provision' with no further commentary added.

Natural Character: Policies 8 comments

Several submissions supported either NATC–P1 (*Appropriate use and development*), P2 (*Restoration and enhancement*), or P3 (*Customary Harvesting*). Out of those comments, the majority simply stated 'agree' or 'I support this provision'.

Natural Character: Rules – Building and Structure Activities 5 comments

A small number of comments focused on the Building and Structure Activities provisions in this subsection. Over half supported NATC–R3 (*structures for natural hazard mitigation purposes within riparian margins by a Regional or Territorial Authority*) while another submitter proposed specific text changes to NATC–R4 (*buildings and structures within riparian margins*). The supporting comments were short statements of 'agree' or 'I support this provision'. A final submitter suggested NATC–R1 (*Customary harvesting within riparian margins*) be linked to rule R3, and R4 should be restricted to alterations or additions only.

Natural Character: Rules - Land Use Activities 5 comments

A small number of submitters responded to the rules around Land Use Activities in this subsection. Four stated their support for either NATC–R1 (*Customary harvesting within riparian margins*) or NATC–R2 (*Restoration and enhancement activities within riparian margins*). These submissions were short and stated 'agree' without further commentary. The final comment proposed a new rule to be added to the Land Use Activities limiting the use of pipes to existing pipework and limiting the use of piping waterways.

Summary

A substantial number of submissions were received for the Natural Features and Landscapes subsection, over two-thirds of which were supportive. About half of all comments proposed specific text changes to selected provisions. A small number suggested expert involvement to assess criteria on a case-by-case basis.

Natural Features and Landscapes

5 comments

A small number of submissions commented generally on the Natural Features and Landscapes subsection. Three were critical of aspects regarding SNAs, with one describing WCC's methodology to identify SNA locations and communication with affected residents as inconsistent and poor, and one arguing that environmental gains would be outweighed by social gains if much-needed medium density housing was built on those sites. The third noted their general support for the protection of indigenous vegetation but stated that Policies P1–P5 will result in shaded, damp, dark and cold housing. Furthermore, the SNA policies will adversely affect landowner rights and property values with no compensation offered. Another submitter suggested The Plan should recognise that these landscapes may have 'operation, technical or safety related requirements for infrastructure' positioned within the boundaries. Lastly, one submitter opposed the mapped out broad-brush approach taken to hill tops and ridgelines and instead suggested a more nuanced approach focused on protecting ridgelines as viewed from public roads.

Natural Features and Landscapes: Objectives

7 comments

A small number of submissions related to the Objectives in this subsection with all proposing specific text changes. One submitter noted the presence of wind turbines as an 'existing modification' has not been included in provisions and proposed a specific text amendment to NFL–O1 (*Outstanding Natural Features and Landscapes*).

Natural Features and Landscapes: Policies

18 comments

A moderate number of submissions commented on policies in this subsection. Over two thirds of the comments proposed specific text changes to selected policies (NFL–P2, P3, P5–P9) and out of those one commented on the 'difference in susceptibility to activities within particular' Outstanding Natural Features and Landscapes (ONFL). A second of those submitters noted the presence of wind turbines as an 'existing modification' has not been included in provisions.

A few submitters simply wrote 'agree': two supported NFL–P6 (*Mining and Quarrying*) and one NFL–P1 (*Identification*). Two submitters opposed new forestry plantations in ONFL as listed in P7. A final submitter suggested easy to restore areas should be identified in The Plan.

Natural Features and Landscapes: Rules – Land Use Activities 12 comments

Several submissions commented on Land Use Activities provisions. All but two supported one of the rules and this was evenly spread between the four rules. Just under half of those strongly supported either R1 (Restoration and enhancement activities) or R2 (*Quarrying, mining and plantation forestry within ONFLS, special landscapes or ridgelines and hilltops*), while one submitter indicated weak support for R2.

Submissions frequently consisted of short comments such as 'agree', 'support', 'strongly agree', or 'probably agree'.

Two further submitters made individual comments, one proposed a time limit on activities controlled in R2, and the other sought clarification on who may carry out activities in R1 and queried the issue of access to private property if only a third party had permission.

Natural Features and Landscapes, Building and Structure

Activities

16 comments

A moderate number of submissions related to Building and Structure Activities in the Natural Feature and Landscapes subsection. Several of those comments supported a specific rule (R5, R7, R9–R11) and most submitted one word statements such as 'agree'. Three of those submitters and an additional three proposed specific text changes to Rules NFL–R6 (*demolition and removal of structures in ONFLs and special landscapes*), R9 (*construction and alteration of structures within ridgelines and hilltops*), and R10 (*construction and alteration to structures in a special amenity landscape within the coastal environment*). Two submitters pointed out that NFL–R8.1 does not exist and this reference in NFL–R7 needs to be changed.

Natural Features and Landscapes, Activity Standards 8 comments

Several submissions were made for the Activity Standards in the Natural Features and Landscapes subsection. All but one supported an individual standard. One submission observed:

Agree. Needs an expert to assess criteria on a case by case basis

The other comment sought clarification to S2 and a clearer definition of the word 'building'. They further proposed a larger building footprint in the rural zone should be permitted regardless of its location in the landscape.

Public Access (PA)

14 comments

Summary

Several submissions commented on the Public Access subsection and over two-thirds expressed support with short comments. A small number proposed specific text changes, while a few comments noted that the lower Kaiwharawhara and Makara are rivers under the RMA definition and should therefore be included by WCC and The Plan's environmental protections.

Public Access: General

2 comments

Two submissions were received with comments relating in general to the Public Access subsection. One submitter noted that streams such as the lower Kaiwharawhara and Makara are rivers under the RMA definition and should therefore be included by WCC and The Plan's environmental protections.

The second submitter commented that the Natural Character subsection does not include Objectives or Policies to implement public access.

Public Access: Objectives

4 comments

A small number of submitters offered single word statements stating they agreed with an objective, with this support evenly split between the two objectives.

Public Access: Policies

6 comments

A small number of submitters commented on the policies in the Public Access subsection. Comments were evenly spread between PA-P1 to PA-P3. All supported the policies, two-thirds agreed with either PA-P1 or P3. A third of submissions proposed specific text changes.

Summary

A moderate number of submitters commented on the Subdivision section with over half of comments opposing specific provisions for a wide range of reasons. A few of those comments proposed specific text changes. Frequently, submissions focused on the value of subdividable land and the restrictions, such as Significant Natural Areas (SNAs), imposed on its potential.

Subdivision: General

1 comment

One submission by Wellington International Airport Limited (WIAL) suggested the subsection should be amended to permit subdivision within the Airport Zone for airport associated infrastructure requirements. Additionally, it was noted the Airport Noise Boundary has not been considered in this subsection.

Subdivision: Objectives

2 comments

Two submitters referred to SUB-O1 (*Efficient pattern of development*) and expressed concern. One discussed specific wording in the policy which limits subdivision of rural land and proposed subdivision of marginal farmland should be treated the same as urban land in this respect. The second submission commended WCC for the Spatial Plan released in early 2021 but expressed concern about the draft District Plan's loose controls over developers. The submitter argued this exposes future developments to even more congested streets and does not incentivise improving much needed acoustic insulation in dense housing situations.

Subdivision: Policies

4 comments

A small number of submitters discussed a variety of policies in the Subdivision subsection. Half opposed the current wording of either SUB-P16 (*Subdivision in SNAs*) or P18 (*Subdivision in ridgelines and hilltops*). The first submitter's opposition focused on the additional costs that SNA overlays adds to the landowner and suggested ecological assessments produce unrealistic time delays to property purchase and sales. They sought the removal of duplicate statements which are already controlled in other subsections. The second opposing statement for SUB-P18 questioned who 'visual amenity and landscape values' relates to and proposed the statement should be deleted or used as a guideline.

Another submitter proposed earthworks and ecological impact of subdivision should be controlled through the respective subsections and requested the references to SNAs should be deleted in this subsection. The final comment supported SUB-P3 (*Sustainable design*) and suggested an amendment to strengthen the policy to require subdivisions to be aligned with public transport options.

Subdivision: Land Use Activities

4 comments

A few submitters commented on the Land Use Activities provisions and rejected various rules in this subsection. Two submitters commented on SUB-R4 (*Subdivision that creates any vacant allotment*). One discussed the 100m separation rule between building platforms and proposed to change it to 50m which would be closer aligned to other Wellington areas and more achievable. The second comment related to R4 opposed the five-year time restrictions between allotment subdivision and instead suggested controlling these via other standards or conditions such as site coverage and open space. One comment was received relating to subdivision specifically in the Spenmoor Street area. The submitter opposed the

limitation of permitted subdivision to the existing allotment size and opposed the requirement that any subdivision would need to be publicly or limited notified.

The final submitter raised the limitations Significant Natural Areas (SNAs) would have on development and the aim to create greater housing density as well as the negative impact on land value and increased maintenance costs.

Subdivision: Standards

4 comments

A small number of comments were received for the standards in the Subdivision subsection. Half of those opposed either SUB-S5 (*Telecommunications and power supply*) or S6 (*Number, size and shape of allotments*). One of those submitters expressed concern that S5 creates and supports an infrastructure monopoly and disallows landowner's freedom of choice. The second opposing statement referred to S6 and argued rural minimum lot sizes should be no greater than 15ha which will also create more funds for rural ecology needs. One submission from Chorus supported S5 due to its 'open access network' allowing residents to choose providers and limiting earthwork disruptions and keeping costs down. The final submission sought an exemption from hydraulic neutrality upstream Stebbins Dam or Seton Nossitor Dam sites 'designed for the 1 in 100 year storm event' in S4 (*Stormwater management*).

General District-Wide Matters 85 comments

Overall summary

A sizeable number of submissions commented on the General District-Wide Matters section. The three most discussed themes were, from most frequent to least frequent: Noise, Coastal Environment, and Earthworks. Generally, these comments expressed concern about either The Plan's permissive approach to noise control or earthworks enabling development. About a quarter of submissions proposed specific text changes, amendments, discussed provisions, or sought clarification. Overall, submissions reflected a desire for a healthy, enjoyable and safe city and were critical of Plan provisions or approaches which threatened those ideals.

Assisted Housing (AH)

15 comments

Summary

A moderate number of submitters commented on the Assisted Housing subsection. Over two-thirds supported The Plan's provisions and Option 4 was the most preferred option by a considerable margin. A few submissions expressed concern about insufficient controls on development, while a further few submitted suggestions and ideas relating to housing matters.

Assisted Housing: General

2 comments

Two submitters supported WCC's intentions in general, with one suggesting assisted housing be integrated in all multi-unit developments. The second submitter (WIAL) cautioned against residential housing (including assisted housing) within the airport zone as aircraft noise may cause reverse sensitivity effects on the operation of Wellington International Airport.

Assisted Housing: Introduction

11 comments

A few people commented on options 1–4 for assisted housing in the Wellington Region.

Option 4 was the most preferred option, supported by a small number of submitters. Option 4 was considered a way to evenly distribute assisted housing in the region as well as being the only option which regulates a way to fund sufficient assisted housing. Two others in support also suggested WCC incentivise alternative housing options such as co-housing or similar as well to support affordable housing solutions and to "retain the current housing chapter".

However, two submitters opposed option 4, describing it as "legalised theft or "effectively a Council Tax to pay for something that the government should be providing, e.g. Kainga Ora."

Another submitter supported option 1 but formulated option 3.5 as their preferred solution, supporting a regulatory approach to affordable housing.

A final submitter suggested the WCC implement at least two options. Next to option 4, options 1 and 2 were also supported. Further, this submitter also suggested more costly housing developments of any kind to support affordable and social housing via a levy.

Two submitters more generally supported options that would incentivise developers, while another submitter argued all developments should be treated equally. One objected to developers' financial contributions if their target area remains unspecified.

Assisted Housing: Policies

2 comments

Two submitters commented on this provision, one on AH-P Option 4 suggesting the contribution start from 4+ unit developments, while the second submitter queried the definition of walking distance in AH-P Options 3 and 4.

Coastal Environment (CE)

19 comments

Summary

A moderate number of submissions discussed wide-ranging issues relating to the Coastal Environment subsection. Comments tended to be very specific to the submitters' interests and this was portrayed in the small number of comments which suggested specific amendments to various provisions. Clarifications to provisions or definitions were requested by a further small number of submitters. Meridian Energy submitted close to half of all comments.

Coastal Environment: General

2 comments

Two submitters commented on the Coastal Environment subsection. One cautioned that the new Coastal Environment overlay should not hinder new or expanding quarries. The second submission was long and detailed and generally sought amendments to the objectives and policies to more realistically and consistently address coastal hazard risks, especially in the city centre. The submitter further requested the probability of risk to be included in The Plan and sought amendments to rule CE-R16.

Coastal Environment: Objectives

2 comments

One submitter commented on both CE-O2 (*Very High and High Coastal Natural Character*) and CE-O3 (*Coastal Margins and Riparian Margins*) and sought clarity of the definition of the physical extent and values of high coastal natural character. The submitter also sought the inclusion of an acknowledgment of the physical presence of wind turbines within part of the coastal environment of existing wind generation structures in the text.

Coastal Environment: Policies

6 comments

One submitter suggested including the provision for vegetation removal in coastal environments for functionality of regionally significant infrastructure in CE-P7 (*Vegetation removal in the coastal environment*). The same comment made in the objectives section about wind turbines being included in the values of high coastal natural character was repeated for CE-P4 (*Use and development in areas of very high or high coastal natural character*) and CE-P7. Another submitter commented CE-P1 (*Use and development*) repeats CE-O3 (*Coastal Margins and Riparian Margins*) and lacks guidance.

Two submitters noted a definition of 'inappropriate' was required for CE-P8 (*Inappropriate activities in the coastal environment*), while a final comment suggested the inclusion of "policy direction for natural character in other parts of the coastal environment" in CE-P4 and CE-P7.

Coastal Environment: Policies – Coastal Hazards

3 comment

Two submitters commented on CE-P9 (*Identification of coastal hazards*). The first suggested climate change effects on the coastal environment should be included in the text. The second submitter proposed to add WIAL and WCC to the provision to authorise their maintenance, alteration, and

construction work. This submitter also noted CE subsections contain duplicates of provisions which are already covered in other provisions.

One submitter stated CE-P12 (*Additions to buildings for Potentially Hazard Sensitive Activities and Hazard Sensitive Activities within the Medium Coastal Hazard Area and High Coastal Hazard Area*) should be amended to prevent significant extensions to existing buildings in high-risk areas and further detailed amendments.

Coastal Environment: Land Use Activities 2 comments

Two submissions discussed land use activities. One noted possible conflict or duplication between CE-R7, (which categorises any activity status in areas of high coastal natural character or coastal/riparian margins not otherwise listed as discretionary) and INF-CE and/or REG. Furthermore, the submitter sought clarity as to whether CE-R10 and CE-R11 are to be taken separately or in addition to rules in REG and INF provisions. The second submitter suggested aligning CE-P2 (*Restoration and enhancement*) with ECO-R3.

Coastal Environment: Building and Structure Activities 2 comments

Two submissions sought clarification, one regarding Rule CE-R10 (*Construction, addition or alteration of buildings and structures, within the coastal environment outside of areas of very high or high coastal natural character and outside of coastal and riparian margins*) and the other CE-R11 (*Construction, addition or alteration of buildings and structures within the coastal environment and within areas of very high or high coastal natural character*). Both sought clarification whether the associated standards apply separately or in addition to REG and INF rules.

Coastal Environment: Standards 1 comment

One submission was received for this provision CE-S1 with the request to specify the “effects management hierarchy to be used in the event of standard infringement”.

Earthworks (EW) 17 comments

Summary

A moderate number of submitters commented on the Earthworks subsection and discussed a diverse range of topics. Clarification requests on provisions were the most frequent topic and a similar amount of submissions indicated concern about earthwork follow-on effects and proposed a more cautionary approach.

Earthworks: General 4 comments

A few submitters commented on earthworks in general. Two opposed WCC taking a development-enabling approach on the basis that earthworks have adverse effects on the environment and increase the likelihood to exacerbate slope hazard failures. A third submitter highlighted a lack of clarity if earthworks chapter provisions apply, as well as having a large number (felt to be too many) overlays for the airport zone.

Earthworks: Introduction 1 comment

One submitter supported the exclusion of quarrying activities from the chapter provisions, noting it is a unique activity.

Earthworks: Land Use Activities

8 comments

Several submissions discussed matters relating to land use activity earthworks on a wide range of provisions. A small number noted the omission of a variety of earthworks effects, with at least half suggesting it be classified as a discretionary activity in various rules: EW-R2, R3, R5, R6, R8, R9, R11, R12, R13, R14, R18, R19. The Fuel Companies supported restricted discretionary earthworks in provision EW-R4 (*General earthworks*) and stated the replacement or removal of underground fuel tanks requires specific exemption. A further submitter supported the principle of the PA condition in WE-R20 (*Earthworks in the Airport Zone*), and noted the rule requires clarification as only some airport precincts are included. One submission stated that EW-P10 (*Earthworks within significant natural areas*) would severely disadvantage private development and WCC are too controlling. One submitter said EW-R22 (*Earthworks in the National Grid Yard*) is unclear as these provisions are already covered in INF-R23.

Earthworks: Effects Standards

5 comments

A small number submitted comments on a wide range of different provisions. One submitter suggested increasing the earthwork threshold in WE-S1 (*Contiguous area*), a second requested temporary earthworks to be excluded from the standard, while a third sought clarification on permitted maximum volumes in EW-S4 (Transport of cut or fill material). Earthworks for a house greater than 200m² along a ridgeline are not a permitted activity under proposed section EW-S12, according to another submitter. A final submitter proposed several text changes and noted duplication or contradiction between EW-S14 (*Earthworks in the National Grid Yard and Gas Transmission Pipeline Corridor*) and INF-S3.

Light (LIGHT)

1 comment

Light: General

1 comment

One submitter supported the exemption of aviation lighting in the introduction of this provision. It was noted that poorly managed lighting can be of significant safety risk to air traffic and this needs to be addressed in the provisions and consenting process of the District Plan.

Noise (NOISE)

24 comments

Summary

A considerable number of submissions were received for the Noise subsection, with around a third of those expressing concern about noise and its significant adverse health effects. Airport noise was the most frequently discussed concern, and generally submitters rejected the approach to its control which was seen as too permissive. Other topics included text specific changes, amendments, or mistakes in The Plan, and a few discussed whether NOISE-S3 and NOISE-S4 should be separated or combined provisions.

Noise: General

1 comment

A submission from Wellington International Airport Limited voiced concern about the permissive approach in the Noise subsection, arguing this is at odds with the New Zealand Standard for Airport Noise Management and Land Use Planning.

Noise: Introduction

3 comments

One submitter commented on different parts of the introduction of the Noise subsection. Points raised included concern that aircraft noise exemptions are considerably more permissive than the limitations set in RMA s9(5) and some aircraft noise should be regulated in The Plan; that reference should be made to current New Zealand Acoustics Standards and added assessment methods should be specified in The Plan; and that there are inconsistencies between the Noise and Temporary Activities subsection and noise limits for temporary activities should be addressed in the Noise subsection.

Noise: Cross references to other relevant District Plan provisions 1 comment

One submitter noted the exemption for aircraft contradicts several chapter provisions for aircraft noise, and argued exemptions should only be to the extent required by RMA s9(5). They suggested if noise limits for temporary activities are in a different chapter, the exemption related to crowd or people noise needs to remain. If that stays, already defined terms and appropriate noise limits should be set for crowd and people noise rather than exempting aspects of the activity from limits.

Noise: Objectives

2 comments

Two submitters commented on objectives. Both observed that noise can have significant adverse health effects and one submitter suggested this should be addressed in NOISE-O2 (*Reverse sensitivity*). The other submitter supported The Plan's statement that "noise ranks highly on the list of environmental pollutants. ... [and] can have adverse effect on health and amenity values". This second submitter focused on airport noise in particular and suggested a sinking lid approach be used to limit noise exposure over time.

Noise: Policies

2 comments

Two submissions were received for the Policies in subsection Noise. One submitter noted the current phrasing implies no change to amenity values are possible and suggested changing the wording. The second submitter noted NOISE-P3 (*Acoustic treatment for sensitive activities*) requires rules which implement the policy.

Noise: Land Use Activities

11 comments

Several submissions were received for various Noise provisions. Three comments were made on provision NOISE-R15 (*Noise from Wellington International Airport activities*). Of those, one contended there are inconsistencies regarding noise control and exemptions and suggested WIAL and WCC combine to produce a holistic set of controls for all airport activities. Another comment argued the airport should apply noise treatment to 'Eastern' residences prior to starting major airside earthworks and tarmac provision. Two comments suggested combining provisions NOISE-S3 (*Sound insulation standards for noise sensitive activities*) and S4 (*Sound insulation standards for noise sensitive activities – Noise area specific*), alternatively the provisions could be divided by noise exposure with a full list of standards referenced in a combined rule. Airport noise was felt to be dealt with in a lax manner in The Plan, not complying with New Zealand Standards and putting residents' health at risk according to another submitter. The submitter advocated for a larger airport zone in accordance with NZS6805.

Another submitter commented on NOISE-R6 (*Emission of noise from helicopter landing areas*) and proposed including helicopters in the overall noise exposure, as well as making helicopter landing a controlled activity in the Hospital Zone to minimise noise impacts on neighbours. Two comments discussed NOISE-R6 (*Emission of noise from helicopter landing areas*), one pointing out a numbering mistake and on suggesting the rule is 'broken'. Another submitter highlighted provision NOISE-R13 (*Noise*

from electronic sound system noise) requires compliance with a Standard that is only applicable to Commercial and Mixed Use Zones. A submitter wondered if a typographical numbering error in NOISE-S10.1 and S10.3 and S10.4 had crept in. A final submission sought to amend NOISE-S7 (*Calculation of Aircraft Noise*) by stipulating mitigation when environmental noise reaches a consistent measured level which should be lower than currently stated.

Noise: Activity Standards – Permitted activity noise and sound insulation standards

4 comments

A small number of submissions were received for a range of provisions. One submitter supported the use of NZS 6803 and noted that although DIN 4150-3 relates to vibrations on structures/buildings, low frequencies can have adverse effects on people and will therefore require control. A second submitter noted a minimum of at least six air changes per hour are required to achieve acceptable ventilation when windows are closed to comply with noise criteria. It was further argued that under NOISE-S3 (*Sound insulation standards for noise sensitive activities*) and S4 (*Sound insulation standards for noise sensitive activities – Noise area specific*), different noise sources should require identical certification for acoustic treatment. A suggestion was also made to either split or combine NOISE-S3 and S4 into individual noise sources. Another submitter favoured a holistic approach to NOISE-S6 to S12 regarding airport noise with a single set of controls. Further, airport noise should be reconsidered from the residents' perspective of total noise received. A final submitter proposed NOISE-S2.5 (*Maximum permitted noise levels by activity: Port Activities*) should refer only to the 'CentrePort Noise Management Plan' without a date in the text to keep this reference up to date.

Signs (SIGN)

5 comments

Summary

A small number of submissions discussed provisions of the Signs subsection. A general sentiment of concern about adverse effects of signs on health or aircraft safety was expressed by most submitters. The remaining comments included signage in rural areas and one submission in support.

Sign: General

3 comments

Two submitters commented on the Signs subsection. One opposed the current location of large and brightly lit signs which are obtrusive and pollute views and amenity to residents and can also be distracting to motorists. The second submitter commented the designation controls do not need replication and the approach taken is ineffective, while illuminated and digital signs should be dealt with aircraft safety in mind.

One submitter felt signs can have adverse impacts on people and suggested public transport and their waiting areas be free of commercial advertising under The Plan.

Signs: Land Use Activities

1 comment

One submitter supported the definition of 'Official Sign' as well as the permitted activity status in Sign-R2.

Signs: Activity Standards

1 comment

One submitter argued that limiting signs to one on rural properties is impractical for large properties such as farms with numerous entrances to different departments/sections.

Temporary Activities (TEMP)

3 comments

Summary

A few submitters commented on the Temporary Activities subsection. Most comments proposed specific amendments or changes.

Temporary Activities: General

1 comment

One submission noted the omission of PORTZ in this subsection, suggesting it should be given enabling provision for temporary activities.

Temporary Activities, Cross references to other relevant District Plan provisions

1 comment

One submitter stated the Noise subsection reference creates confusion and ambiguity.

Temporary Activities: Activity Standards

1 comment

One submitter stated TEMP-S4 should be moved to the Noise subsection or to AP-P6. Either way, it was suggested The Plan should specify measurement and Assessment Standards NZs 680/6802.

Wind (WIND)

1 comment

Wind, Building and Structure Activities

1 comment

One submitter objected to the Wind objectives, policies and rules as well as wind effect rules in the Special Purpose Hospital Zone and Institutional Precinct.

Summary

A considerable number of submissions commented on the Planning Maps. Overall, there was a notable amount of opposition to the various zones and overlays proposed. The proposed intensification and building height increases garnered the most opposition as this was felt to create a loss of character, ambience, and general liveability for existing residents. The same proposal, however, was supported by a small number of submitters. A second prevalent topic was Significant Natural Areas (SNAs) which were rejected by all in their application to private land.

Planning Maps

35 comments

A considerable number of submissions commented on the Planning Maps, with just under half of those opposing the proposed zones or overlays. Of those comments, the most frequently raised topic was the proposed upzoning which brings an increase in building height to the area. Most of those submitters either directly referenced their own property and how tall buildings would affect enjoyment of their house and garden or the accompanying change of a neighbourhood this proposal promises. One submitter opposed this specifically in relation to Oriental Bay.

A small number of submitters supported The Plan's proposed zones or even suggested upzoning a specific property. Of those comments, most related to New World supermarkets. One submission strongly supported intensification in the hope more housing will become available. The submitter suggested 'NIMBYS' had promoted anti-intensification propaganda while young adults in their late 20s to mid-30s remained silent and unaware of the District Plan consultation process.

A second theme emerged around SNAs and a small number of submissions were received which all opposed the proposal. The main reason stated for the opposition to SNAs was the effect on private land, a drop in land value and 'losing' the use of this overlaid land. The delineation of the SNA overlay was questioned by two submitters and one further comment stated they supported the intent of the SNAs but not their effect on private land.

A small number of comments were concerned with the zoning of various specific areas or private addresses. Two submitters suggested their street should be included in the character overlay, another argued that a property should have only one zone applied to it, and one requested rezoning of a Kaiwharawhara site.

A few submitters proposing amendments discussed a terminology change and the identification of the National Grid Transmission Assets on all maps.

The remaining comments discussed a variety of topics: concern about sufficient car parking to service the proposed intensification; the omission of areas identified as Public Open Space which may lead to those spaces being lost to development; a concern about a proposed playground being under-utilised and not stimulating enough for children of all ages; identification of a wrongly located stream on maps; and a final comment was unclear about their meaning and intention.

Part 3 Area-Specific Matters

About the submissions

- Five hundred and fifty-five submissions were received on Part 3 of The Plan.
- Respondents could provide more than one submission, which resulted in submissions being received from 192 submitters: individuals (142), organisations (28), government (3) or local government (1) submitters.
 - The 142 individuals provided 331 submissions
 - The 28 organisations provided 133 submissions
 - The 3 government organisations provided 3 submissions
 - The 1 local government provided 88 submissions
- Note that submitters often commented on one section regarding aspects taken from another part, i.e. provided a submission on strategic direction while making specific points regarding provisions. For added clarity, in some instances submissions have been discussed in a more appropriate place.
- The discussion that follows is ordered by the sections, sub-sections and provisions of the plan.
- Where no submissions were received on a particular section or sub-section this has been identified.

Zones

526 comments

Zones summary

- > Most submissions received for the Zones section related to proposed increase of building height limits and over half of those were made for residential zones.
- > Submitters opposed the new height limits and cited loss of sunlight, shading, wind tunnelling, loss of character and amenity and accompanying pressure on infrastructure from new residential developments.
- > A fifth of submitters commented on Commercial and Mixed Use Zones and stated adverse impacts from the proposed developments on existing households or communities as reasons for objecting to The Plan's provisions.
- > Specific text changes or amendments were proposed in numerous subsections.
- > The remaining submissions included a variety of topics and points relating to those subsections.

Overall summary

There were five times more submissions made on the Medium Density Residential Zone subsections than there were on the General Residential Zone subsections. Over a third of the submissions made on subsections within the Medium Density Residential Zone section were of the pro-forma type and urged that a small number of streets within Mt Victoria have their maximum heights reduced from 21m to 11m. Objections to new maximum heights of 21m were made across the subsections about Residential Zones, and were typically justified with commentary around shading, wind tunnelling, loss of character and amenity, and infrastructure pressure anticipated by the influx of new residents.

GENERAL RESIDENTIAL ZONE (GRZ)

59 COMMENTS

Summary

There was broad support offered for policies and land-use activities subsections, while effects standards comments were a mix of support/oppose comments along with amendments and queries regarding specifics. Many comments, whether in support or opposition, were accompanied by suggested amendments which submitters felt would assist the plan to be enacted in a more equitable or more useable way.

General Residential Zone: General

5 comments

Submissions discussed various topics. One submitter raised points around noise restrictions in/around residential zones, stating it was “necessary to include controls on noise sensitive activities”. Another submitter said they did not support the proposed residential zoning densities, specifically the increased height limits and number of dwellings. They argued that the proposed increases have no regard for ecological, geological, or environmental effects. Another submitter stated that the proposed height for the building on the corner of Stoke Street and Kenwyn Terrace had caused a lot of stress and anxiety in their family and the wider community. They expressed the view that the proposed high-rise building could lead to accelerated damp in some of older surrounding heritage and character buildings, suggesting:

...many idle land sites that sit idle in the city that would be more appropriate for development of new homes and contribute positively to Wellington's liveability without destroying the landscape.

One submitter supported intensification but expressed concerns around the lack of effort to manage the aesthetic and observed there was no indication of green zone/pocket park requirements in residential zones. They also made some specific recommendations around housing development rules:

We recommend much more stringent Design Guidelines that set out factual tables such as the one on p11/16 and more specific standards to ensure we do get a resilient city with green space, sustainable housing development and good public transport.

The remaining comment was in support of increasing general residential zoning height limits. They also expressed opposition to certain areas of GRZ-P3 (*Multi-unit housing*), stating that it should not be “excessively restrictive”.

General Residential Zone: Residential Coastal Edge Precinct 2 comments

The two submitters in this subsection had opposing views, one stating their agreement, and the other arguing that the cumulative impacts of the residential coastal edge and the SNA controls prohibits any reasonable use of this land.

General Residential Zone: Objectives 2 comments

One submission simply stated “Agree”, while another suggested wording on GRZ-O3 (Healthy, safe, accessible and attractive environments) should include “retain natural features where possible”,

General Residential Zone: Policies 24 comments

Comments within the Policies section covered provisions GRZ-P1(*Enabled activities*), P2 (*Non-residential activities and buildings*) P3 (*Multi-unit housing*), P4 (*Housing choice*), P5 (*Retirement Villages*), P7 (*Permeable surface*), P8 (*Vegetation and landscaping*), P9 (*Roading capacity in the Spenmoor Street Area*), P10 (*Urban agriculture and waste minimisation*) and GRZ-PREC01-P1 (*Sympathetic development in the Residential Coastal Edge Precinct*). The submissions made under GRZ-P1, P4, P9, P10 and PREC01-P1 had a number of comments that simply stated “Agree”.

One submitter expressed support for GRZ-P9 (*Roading capacity in the Spenmoor Street Area*) but stated it would not be sufficient to prevent “slow loss of environmental quality”. and that GRZ-P10 (*Urban agriculture and waste minimisation*) should include mention of community gardens.

GRZ-P5 (*Retirement Villages*) was referred to twice, with one submitter referring back to their comments for GEZ-P3 (*Multi-unit housing*). The other submitter was opposed to GRZ-P5 (*Retirement Villages*) and suggested amendments to this provision, giving justification within their submission. General support was shown for GRZ-P3 (*Multi-unit housing*), P5 and P7 (*Permeable surface*) with additional text suggestions around the inclusion of “storm water neutral” to the provisions and another suggestion to add a new requirement for mobility scooter parking.

One submitter suggested amendments to GRZ-P8 (*Vegetation and landscaping*) to require retention of trees and an increase in the area of landscaping for new developments where existing vegetation will be removed.

General Residential Zone: Land Use Activities 10 comments

The majority of the comments within the submissions to this subsection expressed support, with simple statements of “agree” regarding GRZ-R1 (*Residential activities, excluding retirement villages, supported residential care activities and boarding houses*), R9 (*Community Gardens*), R10 (*All Other Activities*) and R7 (*Retirement Village*). One more lengthy submission was made expressing general support for increased density. The submitter made a request for property rezoning to allow them to explore co-housing developments. They highlighted benefits of their location and its proximity to the central city as well as local amenities.

General Residential Zone: Building and Structure Activities 2 comments

Two submissions were made regarding provision GRZ-R16 (*Buildings and structures, including additions and alterations, accessory buildings, and fences and standalone walls, on or over a legal road*). Both submissions included reference to GRZ-P8 (*Vegetation and landscaping*) as well as GRZ-PREC 01-P1 (*Sympathetic development in the Residential Coastal Edge Precinct*).

General Residential Zone: Effects Standards

14 comments

Several submissions were made on this subsection, a small number in support, a few in opposition, and a small number expressing concerns or calling for amendments.

The four submitters who offered support did so for the following provisions: two supported GRZ-S3 (*Building coverage*), one supported GRZ-S7 (*Height in relation to boundary*), and one offered support for “the increase in building coverage, reduction in outdoor space”. One who supported GRZ-S3 (*Building coverage*) also offered an amendment to site coverage.

Opposition was to GRZ-S9 (*Permeable surface area*) and the limits it imposes on buildings site coverage. There was also opposition to GRZ-S2.1.d (*Other boundary setbacks*) in which the submitter wanted to see the boundary setback rule apply only where neighbouring properties are not assessed to be impinged upon. They suggested a small number of amendments. A final submitter in opposition to GRZ-S1 (*Road boundary setback*) opposed the rule in its current form and suggested a road boundary setback exemption diagram to clarify that the immediate adjacent forward part of a building forms the setback.

Remaining submissions expressed concern, such as one in which the submitter wanted to see another requirement for stormwater neutrality added, and one which requested clarification on the minimum communal living space standard. Two submitters expressed concern that the units are too small (both requested additional evidence for their sizing), while another two argued that the coastal edge controls combined with SNA overlays were too restrictive.

Lastly, one submission made specific suggestions for text changes.

MEDIUM DENSITY RESIDENTIAL ZONE (MRZ)

313 COMMENTS

Summary

Building height was the most prevalent topic in comments regarding the MRZ. The maximum permitted building heights of 21m were considered too high to both maintain the heritage value of certain areas and access to sufficient light for residents. Mt Victoria was mentioned in the greatest number of submissions, followed by Oriental Bay, in which objections to increasing maximum heights were raised. Mt Victoria was deemed at particular risk of losing its character appeal if intensification as proposed in the Plan is allowed.

There was broad opposition from residents on proposals to increase housing density in submitters' own areas; these were sometimes accompanied by suggestions of other areas more suited to higher density living or claims that densification as proposed would result in loss of character and infrastructure pressure.

Irrespective of suburb, submitters expressed concern about the ability of city residents to retain current amenity and liveability benefits such as light, pleasant streetscapes, and adequate green space as well as the ability to make minor modifications to their own dwellings. There was concern that if the Plan were enacted, it would not go far enough to maintain these aspects which are considered by some submitters as their right.

Medium Density Residential Zone: General

54 comments

A substantial number of submissions were made addressing density in general, raising a variety of points. The majority of these expressed concerns generally related to negative impacts from increased height limits in areas across Wellington, though several were supportive of various elements of The Plan or expressed their support for enabling development.

Several submissions regarding Mt Victoria expressed fears that the area would lose character value if density were increased. Two submitters stated that the Plan does not afford sufficient protection to

character areas in Mt Victoria – one reporting that neither will the provisions contribute in a meaningful way to housing supply. Another noted that design guidance is lacking in the Plan and because of this, there is a lack of confidence that new developments will “contribute positively to the neighbourhood”. Many submitters included concerns about infrastructure pressure (including schools), light access, wind, parking, and, more broadly, whether high-rise developments would actually result in accessible housing. One submitter stated:

To have property adjoining, that could be developed with 21m tall units under the proposed rules where their amenity can be seriously compromised, is unjust.

A few of those discussing Mt Victoria suggested other places or other ways in which to achieve higher density living, these included: sequencing of development starting with Kent Terrace, Adelaide Road and Thorndon Quay; increasing density at the foot of Mt Victoria; and, implementing terraced housing or allowing character homes to be raised with the installation of garaging beneath.

A small number of submitters on this subsection each opposed either the increased maximum heights proposed for Mt Cook and Aro Valley, or the Medium Density designation of Mt Cook and Aro Valley. Concerns common to both areas were that increased density would adversely affect affordability, access to light, good quality life, and that character or quality of housing stock will be diminished. Twenty one meter maximum heights are considered too high for these suburbs. One person stated:

All I want to say is NO to destruction of my neighbourhood (Mt Cook) by adopting the "medium density housing" designation. Building high rises in streets like mine (Rolleston Street) will destroy our community. The District Plan doesn't take into account what's already here (old much loved homes) that will be overshadowed, crowded and spoiled by a developer's dream come true.

Four submissions focused on Wellington Central. One submitter, while supportive of increased densities, wanted this to mainly occur close to the city centre. One submitter wanted to see Kent Terrace, Home Street, and Hania Street removed from the proposed City Centre Zone citing concerns about access to light. Another wanted the special character of Clifton to be recognised, and that the maximum height be kept at 11m. They suggested other places would be more suitable and that “intensification can be done much more skilfully than is currently proposed”. Another submitter made the point that a more refined approach to determining the future development is needed. As an example, they stated:

The natural slope of the ground down towards the city would accommodate 3 storey structures without undue loss of sun and view shafts I believe. There may be an opportunity on the uphill side of Wesley Road to go above 3 stories as the road behind is considerably higher than Wesley Road in places. This can be seen at the Samoan Embassy currently under construction. There may be other locations in the area where this would also apply. This approach would also allow the gradual development of the area minimizing the impact on existing residents.

Opposition to densification in Oriental Bay (and Hay Street in particular) was expressed by three submitters. This was on the basis that: safety and access may be compromised; parking would be reduced; character and heritage loss would result; community cohesiveness would diminish; disruptions from development would negatively impact on amenity; pressure on infrastructure will increase; traffic safety and natural hazard concerns will be exacerbated; and green space would be lost.

Ongoing years of building work would create dreadful noise pollution - a disturbing effect on the peace that Hay Street residents have mostly enjoyed. What also needs to be considered is the hazards of concrete dust to the environment and on human health.

Areas which were mentioned by one or two submitters opposing up-zoning/increasing densities included: Thorndon, the Hobson Precinct; Brooklyn; and Newtown and Khandallah. One submitter explained they were concerned about infrastructure pressure brought on by increased density in Khandallah, and the increased risk of flooding due to increases in concreted surface areas.

One submitter supported the proposed increased densities in Kelburn, while one opposed the 21m height limit proposed for this suburb.

Broader comments on the Plan were made by a moderate number of submitters. Two submitters commented in favour of protections being made for provision of light, one of which also noted several other spatial concerns with The Plan, namely the injustice that neighbours in multi-storey homes can stop owners building up to that same height and an array of specific comments about the following: sub-floor spaces on sloping sites which stay unexcavated should not be included in the height of dwellings; tall windows and stud heights should be the norm for light access; verandahs and porches be defined as outdoor spaces (not indoor spaces as at present); 2m deep balconies are too narrow; and that side yards should be a choice rather than a requirement.

Three submitters expressed their support for enabling development, with a couple suggesting that the precinct provisions should not override MRZ provisions. One went on to state that “Heritage is a fleeting, arbitrary requirement that is used principally to stifle development”. Another submission was a copy of The Coalition for More Homes’ contribution to a consultation regarding the Enabling Housing Supply Bill. This submission made multiple points, including calling for more enabling standards to encourage more housing and intensification; suggesting replacement of all GRZ and any less permissive MRZ with The Coalition for More Homes submission to the Enabling Housing Supply Bill which provides Alternative Medium Density Residential Standards; and calling for allowances of up to 12 dwellings per site without resource consent (instead of what is proposed in the Coalition for More Homes text).

We want to incentivise good design outcomes by introducing standards that enable medium density while encouraging development that minimises ... poor outcomes.

One person wanted to see the Plan encourage and enable shops in residential areas.

Finally, one submitter wanted to see caps on rents, and suggested that increased densities should result in residents’ rates being halved.

In addition to the comments pertaining to suburbs, a moderate number of submissions made the point that the consultation period was too short and was conducted at an inconvenient time (just prior to Christmas) and that this potentially reduced the quality of discussion that was able to be had. In a few cases this was accompanied by statements to the effect that the large amount of data provided was difficult to process. The phrase “data dump” was used in this context.

Medium Density Residential Zone: Character Precincts comments

9

Submissions on this subsection ranged from the very brief to the lengthy and detailed. The small number of brief submissions included two comments in support of lowering maximum fence heights. Two additional submissions featured the same commentary about reducing protection for character buildings; both called for WCC to be as permissive as possible on innovative ways to develop and improve housing in character areas.

One submission expressed straightforward support for the Mt Victoria character precinct, and another submitter offered support for character areas and for the extension of the Mt Victoria character area.

Of the three submissions to this subsection that were of a greater length, one was supportive of provision MRZ-PREC01-P2 (*Restrictions on demolition*) in full. However, the submitter expressed concern that the

definition of townscape is too broad when putting the design guides into a legal framework. Additional concerns included that there are no minimum standards, the maximum height or site coverage is not an adequate protection, and there should be minimum design standards. They also proposed a requirement for the applicant to demonstrate that minimum standards will be met.

They recommend that provision MRZ-PREC01 (*Purpose*) be changed from “minimise” to “protect” and expressed concern that a height limit of 11m will lead to 3-storey apartments and a destruction of character. The submitter expressed concern that two properties on McFarlane Street are excluded from Townscape precinct and are included in the Oriental Bay precinct. Lastly, they proposed a height limit of 8m, and the removal of height-to-boundary exemption for multi-unit developments.

The second of the three lengthy submissions addressed the exclusion of a property on Vogel Street from the character precinct. The submitter was worried a cluster of housing between McFarlane and Hawker Streets may be too prominent if developed. They proposed minimum performance standards for Mt Victoria and an overall requirement for the applicant to demonstrate that minimum standards are met. As with the previous submitter, they proposed the removal of the height-to-boundary control exemption for multi-unit developments.

The remaining submission on this subsection was a comprehensive description of the heritage characteristics of several properties. The submission did not address specific provisions or aspects of the Draft Plan. The properties listed and described were: Wellington Central Library; Hurston, 1 Mersey St and Melbourne Road, Island Bay; 5-7, 9-11 Grass Street, Oriental Bay, Wellington; 15-17 Hawkestone Street, Thorndon; 22 Hanson Street, Mt Cook; 47-49 Martin Square, Te Aro; and, 230 Oriental Bay.

Medium Density Residential Zone: Mt Victoria North Townscape Precinct

149 comments

A large number of **pro-forma submissions** were received on this subsection requesting an amendment to The Plan reducing the 21m height to 11m. These submissions were similar, with 119 submissions all stating the following:

We submit that the District Plan should be amended to zone Earls Terrace, Port Street, Stafford Street and Lower Hawker Street Mount Victoria at 11m. Reduced from the blanket 21m in the draft plan. An 11m zoning would give fair consideration to:

Access - all three streets are accessed via narrow, single lane, steep streets (Port Street 22%, Earls Terrace 17%).

Parking - there is nowhere for any additional cars that come with WCC's density proposal for our neighbourhood

Dominance: most sections are small so large buildings next door will dominate neighbours with privacy and shading effects.

Townscape: our streets are highly visible from the city and Waitangi Park but are not included in the Mt Victoria Townscape Precinct.

Wind: many properties are in the extreme wind zone category. Any large building would have major wind effects on other properties.

Character: many of the houses in the area were built in the 1890s of native timbers and the area deserves character protection and has heritage value.

Addresses on the eastern side of Lower Hawker Street from Majoribanks St to Roxburgh St all back onto Earls Terrace. These addresses should be zoned at 11m for the same reasons.

A considerable number of additional submissions were a slight variant on the pro-forma submission discussed above, also requesting that the Mt Victoria Townscape Precinct include Earls Terrace, Port Street, Stafford Street, and lower Hawker Street. The submission reads:

We submit that the District Plan should be amended to include Earls Terrace, Port Street, Stafford Street and Lower Hawker Street in the Mount Victoria Townscape Precinct.

Earls Terrace, Port Street, Stafford Street and lower Hawker Street are on the main western ridge line on Matakairangi / Mount Victoria. All four streets are visible from Waitangi Park and make an important contribution to the Wellington townscape. Twenty-one metre high buildings on the perimeter of the town belt on Matakairangi will be an eyesore for all of Wellington and will detract from the beautiful green space that Matakairangi provides to the city.

The one additional submission to this subsection expressed support for “this component of the Draft Plan” on the basis that the Plan offers protection of viewshafts in Mt Victoria and height limits.

Medium Density Residential Zone: Oriental Bay Height Precinct 22 comments

Submissions discussing Oriental Bay generally stated that they oppose the proposed increased height limits. Arguments were frequently centered on the perceived detrimental impact of increased density on character, as the following comment illustrates:

The current model in Oriental Bay already allows for a number of high-rise buildings, constructed so as not to interfere with light and views. To build more will not only reduce light and views for many but is inconsistent with an area in which many archetypical and historical dwellings are already situated, providing character and interest to visitors.

Hay Street gained particular mention, with submissions citing its narrow width (resulting in manoeuvring difficulties and potentially limited access for emergency vehicles), its history of being prone to slips, and its already dense population as reasons to retain its current density and height limits.

Hay St, in particular, is simply not suited to intense three storey development. It is too narrow, too winding, has been prone to slips over many years, and is already densely populated with the current residences.

One submitter, however, strongly supported the increase maximum height limit for a property in Hay Street.

Medium Density Residential Zone: Objectives 7 comments

Two submitters requested that ‘commercial centre’ be defined, while another two offered specific text suggestions.

Two submitters agreed in simple terms with provisions MRZ-O1 (*Purpose*) and MRZ-O3 (*Healthy, safe and accessible living environments*), while one other offered a general statement that the Plan should focus on tasteful new development over blanket protection of heritage (the amenity value of which was said to be questionable).

Medium Density Residential Zone: Policies 15 comments

Submissions addressed varied topics regarding policies.

A small number of submissions requested text changes and a couple wanted to see specific amendments.

Two submitters agreed broadly with the Character Precincts provision while another wanted to see intensification prioritised.

A few submitters expressed concern about how The Plan would achieve its goals. One submission called for stronger policies regarding the retention of trees. An additional submitter called for the achievement of multiple specific outcomes through the City Outcomes Contribution.

A longer submission accepted that The Plan would bring significantly different heights compared to the past but was concerned about the transition between areas that have 21m heights and the character areas that are 11m in height. They suggested there is a lack of policy and standards managing the interface between the two height areas and suggested strengthening policy to guide decision-making on development form in the interface between the character area and multi-unit developments.

One submission pertained a Bidwell Street address, which falls within the proposed MRZ and character precinct. The submitter requested that multi-unit development adjacent to character zones should also have a maximum site coverage of 70%. They also reiterated that more guidance was required for managing the interface between MRZ and character areas.

One submitter addressed provision MRZ-P4 (*Multi-unit housing*), calling for integration of requirements for hydraulic neutrality and cycle parking into multi-unit development policy. The submitter also suggested mobility scooter parking be a requirement.

Medium Density Residential Zone: Rules - Land Use Activities 6 comments

Two submitters simply stated their agreement with MRZ-R9 (*Community Gardens*). Two objected to non-notification clauses, and one submitter each stated the following: support for retirement village activity, a query as to whether working from home is captured under home business.

Medium Density Residential Zone: Rules - Building and Structure Activities, excluding the Oriental Bay Height Precinct 4 comments

Two submitters supported that retirement village activity is precluded from public notification under MRZ-R14 regarding construction and alteration to multi-unit housing and retirement villages. Both of these suggested an amendment that minor alterations such as ramps and covered decks be permitted.

Another submitter wanted the scope broadened for discretion for building on or over a legal road, and offered several other specific text amendments.

Medium Density Residential Zone: Building and Structure Activities in the Oriental Bay Height Precinct 2 comments

Two comments were addressed MRZ-PREC03-R4 (regarding status of activities on legal roads) suggesting amendments to broaden the scope of discretion for building on a legal road.

Medium Density Residential Zone: Effects Standards for - Any residential building or structure on a site containing one or two residential units. Any other building or structure not associated with multi-unit housing or a retirement village. Any buildings or structures within the Character Precincts and Mt Victoria North.

Townscape Precinct as specified in the relevant rule 9 comments

A few submissions sought clarification on how provision MRZ-S4 (*Maximum height*) relates to MRZ S8 (which allows buildings of up to 21m), considering that character areas are 11m while adjacent areas are

21m. Another called for the inclusion of a definition of MRZ-S2 – 1b (*Other boundary setbacks*) to better cater to Wellington’s distinctive topographical situation. They suggest an amendment as follows:

Maybe this should have an ‘or’ that the deck is no more than 500mm above ground level to the adjacent boundary.

One submitter questioned where “decks fit” within MRZ-S3 (*Building coverage*), and another submitter suggested that heights for gables be increased to 11m.

Additional points made in submissions to this subsection include: a request that the permeable surface standard be reduced to 20 percent; and an amendment to require hydraulic neutrality in addition to permeable surface.

Medium Density Residential Zone: Effects Standards for buildings or structures associated with multi-unit housing or a retirement village 30 comments

The moderate number of submissions on this subsection were diverse and covered a range of provisions and topics.

Of the small number that addressed heights, two submitters wanted to know how MRZ-S4 (which only allows a height of 8m) relates to other height provisions, while another sought clarification on maximum height for gables as well as proposed heights. One submission was in opposition to MRZ-S8 (*Maximum height*), stating that these zones cover too large an area and that the heights are too high (the submitter anticipated the impacts of this to include shading, dominating buildings and a complete loss of privacy).

Opposition was expressed by one submitter to provisions MRZ-S8 regarding the 21m maximum height limit) and MRZ-S9 (*Height in relation to boundary*) as it will cause too much shading; and a comment was made that brownfield sites should be developed before developing character areas. Another submitter opposed MRZ-S8, preferring 18.6m or 19m for six storeys.

A small number of submitters addressed provision MRZ-S9: one opposed it (stating the recession plane is too high and too steep), one calling it “too severe” and advocating for using sunlight access to neighbouring dwellings instead. They also proposed a rule that prevents shading on existing solar collectors. The other two suggested the following amendments:

A lower recession plane to the Southern boundary should be added.

We request that multi-unit’s development adjacent to character zones should also have a maximum site coverage of 70%. This will ensure a further management of amenity in character precincts.

A small number of submissions addressed MRZ-S15 (*Minimum daylight access*), three requesting the proposed minimum level of daylight access be increased and three noting that the definition of daylight as opposed to sunlight is ambiguous. One of these submitters stated:

It is confusing, and depending on how “daylight” it is interpreted it is either redundant or disastrously restrictive.

A few submissions addressed MRZ-S14 (*Outdoor Living Space*). One submitter wanted some clarity about the minimum dimensions for communal space (asking: “does 8m mean 8x8= 64m² minimum?”), while the other two submitters offered the following comment:

Minimum dimension must be 3 meters to provide a usable area. Therefore minimum area is 9m².

A couple of submitters each addressed provisions MRZ-S10 (*Maximum building length*), S11 (*Minimum building separation*), S12 (*Minimum privacy separation to a boundary*) and S13 (*Minimum residential unit size*). MRZ-S10 (*Maximum building length*) comments included one who stated the 20m maximum building length is too long, and another seeking clarification on total building length. This submitter went on to suggest:

There should be an ability to have steps in building heights to break up the bulk. 20m at 11m then 5m at 5m. Need to review further how projects on sloping sites could work with a stepped but longer building length, or with smaller spaces inbetween units but bulk is still broken up well.

The two comments on provision MRZ-S11 (*Minimum building separation*) wanted refinement or reconsideration of the building separation rule. One submitter stated:

We think this rule needs to be thought through a bit better if the intention is privacy and shading, where other rules achieve these outcomes.

There were two submissions addressing provision MRZ-S12 (*Minimum privacy separation to a boundary*); one was a request that the provision be clarified with regards to how the standard relates to topography, and the other suggested rewording MRZ-S12.1 to the following:

"Any outdoor living space or habitable room window above ground floor level must be at least 2m from any boundary except a road boundary or a railway boundary."

They considered a reduced setback close to railway lines appropriate given that an extra 2m "won't make the noise any less".

Two submitters commented on provision MRZ-S13 (*Minimum residential unit size*); both considered the minimum residential unit sizes in the Plan too small. One queried whether the (small) size would meet minimum quality of life standards.

Medium Density Residential Zone: Effects Standards for height of accessory buildings, fences, and standalone walls 2 comments

The two submissions on this subsection pertained to fence heights, with both submitters supporting a change to the maximum height: one requested smaller fence heights, and the other suggesting that "1.8 meters is more community-minded and more secure".

Medium Density Residential Zone: Effects Standards for buildings and structures in the Oriental Bay Height Precinct 7 comments

There were a small number of submissions concerning this subsection.

Two of these wanted to see a reduction in the maximum height limit (in Oriental Bay and for Hay Street in particular, from 21m to 11m); two submissions addressed sunlight hours with both proposing an increase in the minimum level of daylight hours (one specifically wanted this amended to 4 hours); two submissions reiterated comments made regarding MRZ-S14 as to the minimum (3m) size for usable outdoor space.

The final submission expressed concerns about the effect up-zoning would have on lower Hay Street, including infrastructure pressure, user safety, ground stability, and natural hazards.

LARGE LOT RESIDENTIAL ZONE

0 COMMENTS

No submissions were received regarding this section.

Summary

Submissions were diverse, including requests to rezone specific properties, discussion of SNAs, and concerns about protecting biodiversity.

GENERAL RURAL ZONE (GRUZ)

9 COMMENTS

Summary

Several submissions were received regarding the Central Rural Zone subsection and almost half of submissions argued specific properties should be in a different zone. Fence height to manage pests such as goats or other pests was another topic discussed by submitters.

General Rural Zone: General

4 comments

Four submissions were made in the general subsection, three of which made requests for rezoning of specific areas of land. One submitter made a request that the two titles on Collins Avenue be rezoned to allow the owner to explore alternative development options in the near future. The land is currently host to a pine plantation which will soon be harvested. The other submitter was in opposition to the zoning of an address Westchester Drive. This land, that has an approved resource consent for earthworks and subdivision (over 80 titles have been issued), is currently GRUZ (*General Rural Zone*), but they wish to have it rezoned to GRZ (*General Residential Zone*) or MRZ (*Medium Density Residential Zone*). Another commenter requested a rezoning of an address on Parkvale Road, part of the lot to General Residential and another part of the lot to Large Lot Residential. They mentioned that resource consent has already been approved for 5 dwellings and it would therefore make sense to rezone to residential especially when considering NPS-UD. This commenter supported the areas of the site that are zoned SNA, as they contain special landscape and may be affected by natural hazards.

Two other submissions were made in this subsection. One submitter stated they were very concerned about how SNAs have been identified and defined. They went on to say:

There appears to be a lack of process for appeal and/or management of sprawl.

General Rural Zone: Policies

4 comments

A small number of submitters commented on policies. Two of these submissions expressed concern regarding provision GRUZ-P2 (*Keeping of goats*). One requested that the suggested fence heights be adjusted to include fences of a height to effectively manage the increasing threat to biodiversity in Wellington, posed by deer. Another submitter stated: "Too many feral goats in the valley, these need management to prevent damage to property".

One submitter showed general support for various provisions related to quarrying, particularly GRUZ-P4 (*Housing choice*), GRUZ-P5 (*Retirement Villages*), and discretionary activity status for GRUZ-R12 (*Demolition or removal of buildings and structures*).

One suggested a correction to GRUZ-P8 (*New residential buildings*) to allow an additional unit to be built on an allotment within the general rural zone, provided that it meets the design guidance within this provision.

General Rural Zone: Effects Standards

1 comment

One comment was made on this subsection, referring to provision GRUZ-S8 (*Fencing requirements for the keeping of goats*). The submitter reiterated their earlier comment regarding ensuring fence heights were sufficient to manage deer.

Commercial and Mixed Use Zones

113 comments

Summary

Submissions mostly concerned the City Centre Zone (50), while the Local Centre Zone and the Metropolitan Centre Zone received 18 and 16 submissions respectively. Building heights were commonly contested; submitters argued that heights as proposed would create shading/crowding, and would adversely impact on character amenity.

Submitters sought clarification or explanation of some provisions, or wanted an exemption for themselves or for their area based on aspects that were deemed unsuitable for a range of reasons.

NEIGHBOURHOOD CENTRE ZONE (NCZ)

13 COMMENTS

Summary

There was concern that maximum height limits are too high, that the proposed zoning for Khandallah does not reflect its intent to remain relatively low density, and, from a few submitters, that aspects of the Plan are too prescriptive to be workable. Objections were also raised about car parking buildings and the need to provide for commercial enterprises.

Neighbourhood Centre Zone: General

7 comments

The small number of submissions on this subsection feature four on the same topic: that is, opposition to Khandallah being zoned as a Local Centre and support for it being zoned as a Neighbourhood Centre. Opposition was expressed to both the 6-storey height limit and the 21m height limit proposed for the area. Various reasons were cited, with submitters arguing that it would negatively impact on the amenity of the area, that present heights and densities are suitable, expressing scepticism that the proposed intensification will result in affordable housing; that if the Plan were enacted as is there would be infrastructure pressure; that children require outdoor recreation space which increased densities will eliminate; and that mature vegetation ought to be preserved.

The thought of "wind tunnels" through Khandallah with 6-10 story buildings without parking, lack of vegetation to break up the concrete jungle hardly enhances the area.

I say NO TO 6 STOREYS. People in Khandallah take pride in their Neighbourhood and do not want to see it destroyed by making areas look like communes.

Two proforma submissions were in opposition to the allowance of building carpark-only buildings in neighbourhoods. They both suggested the removal of NCZ-R13.a.iii (provision for car park building with parking on ground floor) and suggested carpark buildings include a minimum of one or two levels of commercial parking. Additionally, they both wanted to see the minimum height in Area 1 increased and maintained that the 20m maximum building depth is restrictive in some areas and should be increased.

The final submitter on this subsection supported the designation of Marsden Village as Neighbourhood Centre if specific provisions are amended. They proposed a height increase to 18m and a rezoning to Local Centre. Propose a rezoning of GRZ adjoining Marsden Village to MRZ and would like consultation with the Council regarding this area becoming mixed use. They stated:

We oppose the General Residential Zoning adjoining Marsden Village. We suggest that a Medium Density Residential Zoning would be more appropriate for the residential area surrounding Marsden Village.

Neighbourhood Centre Zone: Effects Standards 5 comments

Most of the submissions on this subsection addressed heights. Two submitters argued that the 22m height limit is too high for Aro Valley, and that it would impact negatively on residents due to increased noise, infrastructure pressure, and a lack of light and privacy.

Aro Valley already has a densely built environment. In that respect it already contributes to Wellington's need for denser housing. Further densification through buildings up to 6 or 7 levels would harm the existing character of the area.

One submitter wanted minimum building heights removed, while another submitter wanted to see minimum ground floor heights removed. Both suggested assessment matters should be used instead. Lastly, a submitter expressed concern about the prescriptive nature of frontage controls. They wanted frontage to be a matter of discretion, not standards.

Summary

Heights and distances were contentious. While some supported greater maximum height limits (and wanted to see matters of assessment used instead of prescriptive rules), others called for lower maximum height limits, citing loss of character as a consequence of densification of this type. There were a range of points made seeking clarification of specific distances, rules, or standards.

Local Centre Zone: General

7 comments

Submissions predominantly focused on height limits in different areas. Three suggested that height limits in Newtown, Island Bay and Hataitai be increased to 22m, believing the lower height limit will “prevent growth and development”.

Three submissions focused on Khandallah and expressed concerns about potential negative impacts that a maximum height of 21m 'as of right' could have on Khandallah Local Town Centre. Potential impacts for on retailers and food outlets, emergency preparedness, noise conflict between residential and commercial, carparking, traffic, loss of amenity values, heritage, infrastructure, transport, and fire safety were raised. The submitter was also concerned about increasing rent and development costs as a result of the height allowances in the Draft Plan. Two submitters specified Khandallah should be rezoned as Neighbourhood Centre Zone. One also wanted a specific design guide for Khandallah Village Centre and cited a 2015 WCC consultation in support of their requests.

One of these submitters also stated that the Johnsonville line is not rapid transit.

The last was a simple request that an address on Rintoul Street, Newtown be included as an address provided with residential parking.

Local Centre Zone: Objectives

1 comment

The submitter supports objectives LCZ-O2 (*Activities*) and LCZ-O1 (*Purpose*) but provided an amendment to LCZ-O1, stating:

Local Centres also need to enable a broad range of commercial activities that support the medium-density business and residential intensification sought.

Local Centre Zone: Policies

2 comments

The two comments made on this subsection supported the intent of the provisions, but submitters wanted to see amendments. For one submitter, this was for new policy to recognise functional commercial requirements, such as loading zones and rubbish and recycling capabilities.

The other submitter, Z Energy, supported the intent of the provisions but made a range of suggested amendments:

LCZ-P2 (*Enabled Activities*) and LCZ-P4 (*Potentially Incompatible Activities*): too specific and will catch all existing activities under each term/definition.

LCZ-P7 (*Quality Design Outcomes*): should recognise the alternative design responses necessary for the functional requirements of a range of activities.

LCZ-P10 (*comprehensive Development*): should recognise the existing environment and that alternative design responses are necessary for functional requirements of a range of activities, including existing service stations.

LCZ-P11 (*City Outcomes Contribution*): should recognise the existing environment and the functional requirements of a range of activities.

Local Centre Zone: Land Use Activities

1 comment

One submission to this subsection stated conditional support for LCZ-R14 (*Yard-based Retailing Activities*) barring its public notification aspect.

Local Centre Zone: Building and Structures

1 comment

The single submission on this subsection stated that aspects of it were confusing, specifically LCZ-R20 (*Conversion of Buildings for Residential Activities*) which is unclear about when a development is classed as comprehensive development and when the 20m side length building standards become relevant.

Local Centre Zone: Effects Standards

6 comments

A few submitters on this subsection had concerns about the specifics of heights and/or distances: one wanted to remove the minimum building height standard and use assessment matters instead; another wanted to remove the minimum ground floor height standard and the use of assessment matters instead; and one was unclear on acceptable setback calculation for LCZ-S11 (*Maximum building depth*).

Z Energy supported the intent of LCZ-S5 (*Verandah control*) and LCZ-S6 (*Active Frontage and Non-Residential Activity Frontage Controls*) but did not think they are practical for service stations.

One submitter expressed concern that developers will subdivide their land or not amalgamate properties to avoid complying with Standards LCZ S10 (*Building Separation Distance*), suggesting rules and standards should be made clearer to prevent this. Lastly, a submitter reiterated concerns that frontage controls are too prescriptive and want to see frontage as a matter of discretion, not standards.

COMMERCIAL ZONE (COMZ)

7 COMMENTS

Summary

Submissions regarding the Commercial Zone were largely in support. Where amendments were suggested, they were usually for clarification, or to recognise the specific land-use needs of certain commercial operators.

Commercial Zone: General

4 comments

Two submitters stated they had “no concerns regarding the Commercial Zone section”.

One submitter expressed opposition to intensification in areas of Thorndon due to security and loss of character and sunlight. They suggested:

A more targeted approach to where 27 metres can be built when it is adjacent to character housing and the effect a 27 metre building would have on those properties.

The last submitter expressed opposition to Wesley Road becoming a commercial site, stating:

It's proven to be one of the best residential streets Wellington has to offer. It would be a disaster to change the regulations to enable this proposal to pass as law.

Commercial Zone: Policies

1 comment

The single submission was proforma and supported recognition of the “functional and operational requirements of activities and development” in a Commercial Zone.

Commercial Zone: Land Use Activities

1 comment

The one submission on this subsection wanted to see the word “cumulative” deleted from the statement “total cumulative GFA” so that consistency across zones is achieved.

Commercial Zone: Effects Standards

1 comment

The submitter opposed minimum ground floor height standard. They considered it to be more appropriate to approach this matter “within the Design Guide or as matters of discretion”.

MIXED USE ZONE (MUZ)

9 COMMENTS

Summary

Submitters either supported the subsections or argued that there should be provision for larger/higher buildings in the Mixed Use Zone. One sought an exemption for their commercial operation.

Mixed Use Zone: General

3 comments

Two proforma submissions suggested a maximum gross floor area of 500m² may not be reasonable and suggested the figure be removed or extended to support greater density.

The other submitter would like to see reconsideration of Height Controls in MUZ specific to Tawa Junction at a specific property in Surrey Street. The submitter argues that the Tawa Junction site is unique to other sites in the Height Control Area and therefore that greater height should be allowed in this location (especially to align with NPS-UD). Their suggested amendment is that Tawa Junction site be removed from Height Control Area 4 and amended to form a new Height Control Area 5 within MUZ-S1 (*Maximum Height for the Purposes of MUZ-R16.1*) which permits maximum height of 22m.

Mixed Use Zone: Objectives

1 comment

The submitter supports MUZ-O1-O5 (*Objectives*), stating:

they provide a balanced approach to compatibility of activities with other zones, contributing to a well-functioning urban environment, the management of effects and accommodating and supporting for growth.

Mixed Use Zone: Policies

2 comments

One proforma submission and one from Z Energy were made on this subsection. The proforma submission suggested new policy to recognise functional commercial requirements. The other submission expressed support for MUZ-P5 (*Design of New Development*) as it recognises operational design needs, such as those that may pertain to service stations.

Mixed Use Zone: Land Use Activities

1 comment

The submitter expressed support for MUZ-R1 (*Commercial Activities, excluding integrated retail activities and supermarkets*) but would like clarification around whether service stations are a commercial activity. The

submitter supports the principle of rule MUZ-R13 (*All Other Activities*), however they expressed concern as to whether service stations fall in this category.

Mixed Use Zone: Effects Standards

2 comments

Two submissions addressed this subsection, one wanted an amendment to MUZ-S7 (*Verandah Control*) stating that “this standard does not apply to service stations”.

The other submission expressed opposition to minimum ground floor height standard.

METROPOLITAN CENTRE ZONE (MCZ)

16 COMMENTS

Summary

A range of specific comments were made in several subsections regarding heights, setbacks, lengths and distances and the rigidity of rules pertaining to these.

Metropolitan Centre Zone: General

4 comments

Two submissions supported aspects of this subsection: one supported provision MCZ-S1 (*Maximum Height*) for maximum height limits of 27m, and the other expressed support for the Metropolitan centre zone, specifically that it appears to deal “excellently” with housing, amenity and wellbeing needs of residents and visitors.

Two submissions were made making the same point as was made for the Local Centre and Neighbourhood Centre Zones; that is, that separation distance between buildings should be amended to 4-6m and that the 20m maximum building depth is restrictive.

Metropolitan Centre Zone: Objectives

1 comment

One submission was in support of MCZ-O1 (*Purpose*), stating that the objective “meets the sub-regional needs of communities, businesses and residents”.

Metropolitan Centre Zone: Policies

2 comments

The two comments made on this subsection broadly supported the intent of the provisions, but submitters wanted to see amendments. For one submitter, this was for new policy to recognise functional commercial requirements, such as loading zones and rubbish and recycling capabilities.

The other submitter, Z Energy, supported the intent of the provisions, specifically MCZ-P2 (*Enabled Activities*), and made a range of suggested amendments to provisions as follows.

MCZ-P1 (*Accommodating Growth*): additional emphasis should be afforded to the provision of, or convenient access to, a range of commercial activities.

MCZ-P4 (*Potentially Incompatible Activities*): is too specific and it will impact on the continued operation, maintenance and upgrade of a range of existing activities.

MCZ-P7 (*Quality Design Outcomes*): requires redevelopment to attend to aspects around sense of place.

MCZ-P10 (*Comprehensive Development*): should recognise the existing environment and that alternative design responses are necessary for functional requirements of a range of activities.

MCZ-P11 (*City Outcomes contribution*): should require over height, large-scale residential, non-residential, and comprehensive development in the Metropolitan Centre Zone to deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guide guideline.

Metropolitan Centre Zone: Land Use Activities

1 comment

The submitter supports MCZ-R14 (*Yard-based Retailing Activities*) although does not support public notification, believing it to have the potential for unintended consequences when maintaining and upgrading. The submitter wanted clarity on two points: that maintenance and upgrading would be exempt and an exemption when it is on the border of another zone.

Metropolitan Centre Zone: Building and Structures

1 comments

The submission on this subsection expressed confusion about when development becomes comprehensive development and in which instances the 20m side length standards becomes relevant in provision MCZ-R20 (*Comprehensive Development of Land 1600m² in Area or Greater*).

Metropolitan Centre Zone: Effects Standards

7 comments

A small number of submitters on this subsection had concerns about the specifics of heights and/or distances: one opposed the minimum building height standard and wanted to see assessment matters used instead; another opposed the minimum ground floor height standard and wanted to see assessment matters used instead; one sought clarity on height controls for a property on Johnsonville Street (being unsure if 21 or 27m height standard applies); and one was unclear on the acceptable setback; stating:

There should be some clear guidance as to what acceptable mitigation in terms of bulk and dominance is. If a setback is proposed, what is considered an acceptable setback? Or can the applicant only use cladding to break the sheer wall effects?

Regarding provision MCZ-S5 (*Verandah Control*), the submission from Z Energy stated it would not be practical for a service station and suggested amendments to provision MCZ-S6 (*Active Frontage and Non-Residential Activity Frontage Controls*) for buildings built to street edge.

Two submitters had concerns about other aspects of the provisions under this subsection. The first predicted that developers could subdivide their land or not amalgamate properties to avoid complying with Standards LCZ S10 (*Building Separation Distance*). They went on to suggest rules and standards are made more explicit to prevent the above taking place. The final comment on this subsection was concerned that frontage controls are too prescriptive and wanted frontage to be a matter of discretion, not standards.

Summary

The majority of submissions on the City Centre Zone were general, and almost all objected to the proposed zoning of the Hobson precinct as Medium Density Residential Zone. Opposition was centred on perceptions that rezoning would adversely impact character, access, liveability, light and infrastructure pressure.

Irrespective of a named location, submitters expressed general concern about aesthetics of new, tall building, and the retention of and access to green space in a densified city.

Support was offered for some height subsections, with one submission from a property developer arguing that planned increases to maximum heights at one address did not go high enough. An additional submission from an overseas consulate opposed increased maximum heights around their address and the removal of the requirement to notify this, citing security reasons.

City Centre Zone: General

38 comments

A considerable number of submissions were received on this subsection. The vast majority of these argued that the Hobson Precinct should be rezoned as a Medium Density Residential Zone (MRZ) with character protection.

Fourteen submissions contained the following proforma statement:

The Draft District Plan has the Hobson precinct (defined below) included in the City Centre Zone. It is my submission that this zoning should be amended to the zoning recommended in the Officer Recommended Spatial Plan (also known as the "Pre-approved Spatial Plan 2021"), i.e., to the Medium Density Residential Zone with character protection as noted in that Spatial Plan.

Approximately the same number of submissions contained a version similar to that above, and the combined total of these contained arguments about the value of heritage characteristics, and the detriment that loss of access to light and greenspace, higher density living, and higher rise buildings would bring to the area.

A few submissions simply noted that extending the CCZ would not be an appropriate planning solution in the case of Thorndon/the Hobson Precinct.

Various points were raised by several other submissions.

Two submissions argued there should be greater provision for green space in the CCZ, and one included opposition to Hobson being zoned as City Center. One of these submitters wanted to see an address on Cuba Street purchased and converted into green space, and another cited the following provisions in their arguments that CCZ green space be increased: CCZ-O2.4 (*Convenient access to a range of open space options including green space*); CCZ-05.6 (*Protecting current areas of open space including green space and harbour access*); and CCZ-P9.6 (*Diversity of accessible, well designed civic and public space including green and harbourside space*). They summarised their argument as follows:

A basic principle is that development needs in this and other city zones need not and should not come at the expense of environmental quality and especially at the expense of loss of green space, large amenity trees (whether Notable Trees or trees on public spaces) or streams/natural waters.

Two proforma submissions supported minimum building heights but suggested amendment of CCZ-S1 (*Maximum Height*) by removal of height limits, and stated that CCZ-R13 (*Carparking Activities*) should be

amended so that carpark buildings are not automatically approved. They also advocated for more accessibility consideration throughout the Plan and generally supported Ahi Ka provisions.

Another submission expressed their support for intensification in the central city and fewer restrictions on height limits, saying:

It would be great to see the council utilising this in future to allow for higher building construction in the central area despite unlimited heights not being adopted.

A submission made on behalf of the U.S. Embassy expressed opposition to both the increase in height limits, and the minimum heights for new buildings proposed for the land adjacent to the Embassy. They oppose CCZ-S1 (*Maximum Height*), requesting that buildings adjacent to their property not be granted approval to be built to 27m without resource consent or notification. For security reasons, they would like to see the maximum height for buildings adjacent to their property remain at 10m. The submitter also opposed provisions CCZ-S5 (*Minimum Building Height*) and CCZ-R19 (*Construction of Buildings and Structures, excluding comprehensive development*).

A submission made by a property company expressed their opposition to the City Outcomes Contributions. They went on to specify that they oppose the street edge height controls; and they seek “the height limit at [an address on] Lambton Quay to be increased to 16m”; the deletion of provision CCZ-S4 (*Street Edge Height*); and they would like to see CCZ-S9.1.a (*Active Frontage Control*) amended as follows:

“Be built up to the street edge on all street boundaries and along the full width of the site bordering any street boundary, excluding vehicle and pedestrian access and public open spaces;”

The final submission on this subsection was from Z Energy, who noted concern about tension between service stations and zoning that is pedestrian and streetscape-orientated. They requested clarity be provided that service stations are considered commercial activities.

City Centre Zone: Objectives

1 comment

The submission on this subsection provisionally supported CCZ-O1 (*Purpose*) and CCZ-O2 (*Accommodating Growth*) with an amendment to enable a broader range of commercial activities.

City Centre Zone: Policies

2 comments

One proforma submission called for a new policy to recognise functional commercial requirements, and the other submission was a detailed one addressing the following provisions:

CCZ-P1 (*Enabled Activities*): support.

CCZ-P2 (*Potentially Incompatible Activities*): support with amendment to address its specificity and the impact this may have on maintenance and upgrade of existing activities.

CCZ-P8 (*Comprehensive Development*): support with amendment to better reflect functional requirements for activities.

CCZ-P10 (*Quality Design Outcomes*): support with amendment that the provision recognises alternative design responses are necessary for functional requirements of a range of activities.

CCZ-P12 (*Managing Adverse Effects*): support with amendment to recognise existing environment and functional requirements of a range of activities.

City Centre Zone: Land Use Activities

2 comments

The two submissions made on this subsection expressed concerns about a number of specific details. The first addressed a perceived lack of green space in Mt Victoria; opposition to densities proposed for Kent Street and Cambridge Terrace; and improvements to cycling and pedestrian access. They stated:

The land from the Basin Reserve down Kent/Cambridge Terraces is low lying, has underground water tributaries, has a recently identified fault line beneath (Aotea fault, refer Stuff article) and has a sediment layer twice as thick as previously believed. It is questionable whether the land in this corridor should be used for any residential accommodation of high-rise nature.

The other submission was in support of CCZ-R1 (*Commercial Activities*), and suggested that CCZ-R14 (*Yard-based Retailing Activities*) will have unintended consequences when maintaining and upgrading. On these grounds, the submitter sought exemptions, as described below:

Z Energy seeks clarity that operation, maintenance, and upgrade of existing service station / yard-based retail activity are not subject to this requirement, which is not considered appropriate for existing activities. Z Energy also considers there should be another exception to the notification analysis and that is where an existing or new activity is located on the edge of the zone.

City Centre Zone: Effects Standards

7 comments

A small number of submissions addressed amenity issues with submitters noting concerns pertaining to the following areas/streets: Moir Street (Plan fails to protect character, heritage, and access to sunlight); Hania Street (Plan fails to incorporate sufficient green space); Kent Street and Cambridge Terrace (submitter queries the likelihood of natural hazards affecting these streets due to their low-lying nature, and questions the safety of building greater than 3 storeys due to this and earthquake risks); Taranaki Street (should be the only place in Te Aro in which heights of 27m heights are allowed); Mt Victoria (Plan should reduce permitted heights to protect character of area and reduce wind tunnelling and shading); and Te Aro (Plan does not allow for protection of amenity and the proposed densities are too high).

Additional submission topics addressed:

- > Opposition to combined bus/cycle lanes, support instead for a cycleway in the Golden Mile and fast rollout of cycleway infrastructure generally.
- > Concerns about the prescriptive nature of frontage controls and support for frontage to be a matter of discretion, not standards.
- > Opposition to minimum building heights and support for assessment matters instead.

Lastly, one submitter wanted to see amendments to CCZ-S8 (*Verandahs*) and CCZ-S9 (*Active Frontage Control*) to better suit the needs of service stations.

Industrial Zones

1 comment

Summary

One submission included a suggested amendment to provision GIZ-O3.2 (*Commercial Activities – are of a nature and scale that does not undermine the hierarchy of Centres*).

GENERAL INDUSTRIAL ZONE (GIZ)

1 COMMENT

Summary

One submission included a suggested amendment to provision GIZ-O3.2 (*Commercial Activities – are of a nature and scale that does not undermine the hierarchy of Centres*).

General Industrial Zone, Policies

1 comment

The submitter suggested an amendment to provision GIZ-O3.2 (*Commercial Activities – are of a nature and scale that does not undermine the hierarchy of Centres*) to allow activities other than what is listed in GIZ-P4 (*Amenity and Design*) as permitted activity, while maintaining that they be of a nature and scale that do not undermine the hierarchy of Centres.

Open Space and Recreation Zones

6 comments

Summary

The majority of submissions in this subsection were in favour of protecting the integrity of areas of existing open space and limiting damage to flora and fauna.

NATURAL OPEN SPACE ZONE (NOSZ)

2 COMMENTS

Summary

Two submitters commented on this subsection and represented opposing views. One favoured stronger protection of indigenous vegetation and conservation in the Natural Open Space Zone while the other advocated for a more permissible approach.

Natural Open Space Zone: General

2 comments

There were two divergent comments received. One submitter stated some of the spaces zoned Natural Open Space are in fact highly modified and so requested that:

...a more explicitly permissive rule regime should be provided in the Plan for such works in this location of the City.

The other submitter wanted to see more protection of existing native vegetation, and supported increased conservation activities in the area including increased planting, weeding, and rubbish collection.

OPEN SPACE ZONE (OSZ)

1 COMMENT

Open Space Zone: General

1 comment

The submitter sought reclassification of four addresses on Karo Drive currently owned by NZTA Waka Kotahi and leased by Wilsons Carpark to Open Space Zone; specifically that it should be “earmarked as a Council park” given its proximity to SH1 and the benefits it could provide as a carbon sink, “green buffer”, and as a measure to assist in the Council’s aims to reduce dependency on private car use.

SPORT AND ACTIVE RECREATION ZONE (SARZ)

0 COMMENTS

No submissions were received regarding this subsection.

WELLINGTON TOWN-BELT ZONE (WTBZ)

3 COMMENTS

Summary

The few submissions received for the Wellington Town-Belt Zone all expressed concern about insufficient protections for the environment from human activities.

Wellington Town-Belt Zone: General

1 comment

The one submission on this subsection felt that maps should designate this as an Open Space and Recreation Zone and that it should be distinct from the other Special Purpose Zones. The submitter disagreed with provisions WTBZ-R6 (*Construction, Alteration and Additions to Footpaths and Tracks*) and WTBZ-R7 (*Construction, Alteration and Additions to Car Parking Areas and Vehicle Access*), fearing these could allow unconstrained construction. They went on to state they:

Consider there should be separate rules for maintenance and minor upgrade of existing footpaths, tracks and parking areas, but that any new such facilities should be restricted, discretionary and subject to appropriate matters of discretion, including demonstration of a need for the new facility, and visual, amenity and other effects.

The submitter objected to WTBZ-S4 (*Maximum Building Coverage*), asking it be removed on the grounds that it is unclear “how a 5% coverage of any part of the Town Belt would be assessed”.

Wellington Town-Belt Zone: Land Use Activities

2 comments

Submitters addressing this subsection were concerned about the disruption mountain bike tracks have on the environment.

One submitter opposed provision WTBZ-R6 (*Construction, Alteration and Additions to Footpaths and Tracks*), believing that increased mountain bike routes in the area would unfavourably impact the “natural environmental and native species habitat”.

The other submitter sought an amendment to WTBZ-R1 (*Informal Recreation Activities*) to include specific provision for the conversion of existing multi-use tracks to walk/run only, where mountain-biking is not permitted. The submitter expressed the view that while mountain bike tracks are expanding rapidly to the potential detriment of the environment, there are insufficient ‘walking only’ tracks.

Summary

There were seven Tertiary Education Zone submissions, each containing specific amendments and clarification suggestions. There were five submissions on the Airport Zone: a residents group and an airline representatives group offered divergent opinions on the role of the Airport – one wanting to see its position strengthened, and the other wanting to see expansion limited. Other submitters' points were specific suggestions.

The Waterfront Zone received five submissions, which, again, each contained specific suggestions and amendments.

The four Port Zone submissions all called for measures to strengthen the position of the Port and to assist in its ability to operate effectively.

Other Zones received 2 or fewer submissions: the Quarry Zone, the Future Urban Zone, and the Hospital Zone.

AIRPORT ZONE (AIRPZ)

5 COMMENTS

Summary

A small number of submitters commented on various topic regarding the Airport Zone. Two submitters opposed either parts of or the whole subsection. Two further submissions were divided, one arguing for more protections from airport activities to surrounding locations and activities while the other sought more protections for airport operations from outside activities. Clarification was sought for rule 3 of this subsection.

Airport Precincts, Designations, and other subsections

0 comments

No submissions were received regarding the following subsections:

- Airport Precincts, Terminal Precinct, Airside Precinct, East Side Precinct, West Side Precinct, Rongotai Ridge Precinct, Miramar South Precinct, Broadway Precinct, South Coast Precinct
- Airport Noise
- Airport Designations, Airspace Designations, Other Designations
- Material Incorporated by Reference

Airport Zone: General

3 comments

One comment expressed the need for the entirety of AIRPZ to be reviewed and revised. They suggested The Plan should provide both an airport zone and airport related designations similar to those used in Auckland and Queenstown.

Two lengthy submissions from incorporated societies took opposing stances on various elements of this subsection: the Board of Airline Representatives New Zealand Inc (BARNZ), and residents' group Guardians of the Bays.

The residents' group submitted several concerns about airport expansion and consequent environmental and residential impacts, while the group representing airlines submitted on 58 points pertaining to specific aspects of this subsection. These are each summarised in turn.

The residents' group expressed concern about the effects of the airport on noise, air quality, climate emissions, and encroachment onto less or undeveloped land (including golf course land). They opposed the removal of the buffer land of Miramar Golf Course, and suggested that independent air noise modelling for the airport be undertaken by WCC. They stated that more community involvement is needed in the development of any new ANB and would like to see permitted activities removed from the airport zone.

The submission provided viewpoints around AIRPIZ standards in detail and proposed that intensification around the airport would improve housing stock and counter airport influence. They opposed further extension of the south coast precinct. The following broad comment was made:

One of the difficulties with rolling the operative district plan provisions into the Airport designation is that it compromises the district plan process, particularly impacts upon how airport noise is controlled in the proposed plan provisions.

BARNZ offered a series of viewpoints including suggested changes, amendments, and concerns. Their submission expressed a call to strengthen the recognition of the role of Wellington Airport, suggesting that the five Strategic Objectives SCA-O1, O2, O3, O4, and O5 in subsection Strategic City Assets and Infrastructure require amendments to achieve this. They also stated the following:

The submitter supports the introduction of provisions that prohibit new sensitive activities in ANB.

They assessed The Plan's reverse sensitivity restrictions as being "a good start" but argued it needs better alignment with New Zealand Standards and other large airports. They also suggested the relationship between this subsection and designations needs to be explained better to avoid confusion, noting that provision NOISE-R5 (*Construction, Alteration, or Addition to a Building or Accessory Buildings and Structures containing a Noise Sensitive Activity within the Airport Air Noise Overlay (ANO)*) does not contain direct reference to reverse sensitivity and that rules related to reverse sensitivity effects should be specified in matters of discretion.

They supported the exemption for aviation lighting and suggests the Airport be included in "transport network" definition so that effects of light on Airport are addressed.

They supported the incorporation of updated forecasts into the plan (re: Aircraft Noise Overlays).

BARNZ made several comments regarding housing and development. They expressed concern that the subsection does not manage subdivision within Airport Air Noise Boundary, and stated that whichever option is selected regarding assisted housing, this should not allow less regulated development around the airport. They noted they the Select Committee's interpretation regarding application of RM (Enabling Housing Supply and Other Matters) Bill; they consider that the Bill should not alter general approaches to land use planning in noise sensitive areas.

The BARNZ submission included discussion of how this subsection relates to other areas of The Plan. Regarding subsection General Residential Zone, the submitter argued it should include controls on noise sensitive activities within those parts inside the Air Noise Boundary and made suggestions for amendment to definitions. They requested better consistency and clear cross referencing, claiming there is conflict between designation and District Plan provisions. They also claimed that some provisions re: infrastructure conflict or duplicate one another, and express their assumption that this chapter does not apply to Airport Zone. Additionally, they expressed concern about inclusion of airport in Coastal Environment Overlay.

Finally, the submitter suggested further consideration is required as to how The Plan can align with other transport initiatives.

Airport Zone: Land Use Activities 1 comment

One submission was made in this subsection. The comments left by the submitter sought clarification that AIRPZ-R3 (*Compatibility of other activities*) would allow for the ongoing operation, maintenance, and upgrade of the Z Broadway service station.

Airport Zone: Land Use Designations 1 comment

The submitter who commented within this subsection disagreed with ESA (Public) Parking being shown as a permitted use in AIRPZ-S1 (*Permitted Activities and Structures*). They made the request that parking be removed from 'East Side and Main Site' and added to 'Main Site Only'.

SPECIAL PURPOSE CORRECTIONS ZONE (CORZ) 0 COMMENTS

No submissions were received regarding this subsection.

FUTURE URBAN ZONE (FUZ) 1 COMMENT

Future Urban Zone: Effects Standards 1 comment

One comment was left in this subsection, referring to provision FUZ-S5 (*Fencing requirements for the keeping of goats*). The submitter requested that the suggested fence heights be adjusted to include fences of a height to effectively manage the increasing threat to biodiversity in Wellington, posed by deer.

HOSPITAL ZONE (HOSPZ) 1 COMMENT

Hospital Zone: General 1 comment

The one submission on this subsection was in support of the Special Purpose Hospital Zone. However, they expressed opposition to several provisions and suggested various amendments:

Zone and HOSZ-S1 (*Maximum Height*) to include two addresses on Coromandel Street which are part of the Newtown Hospital campus. Additionally, they wanted to see the boundary between height control areas be moved 80m south.

They expressed support for the definition of "hospital activities" but suggested "residential accommodation for staff" should be broader. They noted that problems can stem from the broad definition of "public spaces", suggesting an amendment to replace "public space" in HOSZ-R5 (*Additions and alterations to Buildings and Structures*) and HOSZ-R6 (*Construction of new buildings and structures*) to state "legal road".

Regarding HOSZ-R6 (*Construction of new buildings and structures*), the submitter claimed the maximum gross floor area is too low and stated that HOSZ-S2 (*Height in relation to boundary*) should be altered to limit its application.

They considered that suggested existing Operative Institutional Precinct provisions are sufficient and would support the permitted status of Hospital activities that comply with HOSZ-S1 (*Maximum Height*) and HOSZ-S2 (*Height in relation to boundary*).

Finally, the submitter opposed proposed rules HOSZ-R5.2 (*Additions and alterations to Buildings and Structures – Restricted Discretionary*) and HOSZ-R6.2 (*Construction and new buildings and structures – Restricted Discretionary*) and sought retention of these as in the Operative Controlled Activity regime. They opposed the extension of wind provisions to cover the Special Purpose Hospital Zone.

Summary

A small number of submitters commented on the Port Zone subsection and discussed a variety of topics related to this subsection. Submitters proposed specific text amendments or references to be added to the subsection.

Port Zone: Inner Harbour Port Precinct

2 comments

Two submissions were made in this subsection. One respondent discussed the need to include creation of space for operational port activities or passenger port facilities in the permitted activity rule in PORTZ-PREC01-R6 (*Demolition or Removal of Buildings and Structures*). The other submitter expressed their support for the statement in the Introduction that 'The Inner Harbour Port Precinct area also has potential for better connections with adjacent transport networks, including the Wellington City bus terminal and Wellington Railway Station.' They noted it will be important to consider and optimise future transport opportunities in this area and made the suggestion to include specific reference to the Public Transport Network in PORTZ-PREC01-P3 (*Inner Harbour Port Precinct – Access, connections and open space*), as well as PORTZ-PREC01-O1 (*Inner Harbour Port Precinct – Purpose; Amenity and design*).

Port Zone: Multi-User Ferry Precinct

2 comments

Two submissions were received within this subsection. The first of these suggested that the permitted activity rule should include creation of space for or associated with passenger port facilities. The other submitter was in support of the objectives set out in this section. They suggested an amendment to place greater emphasis on freight movements in MUFPP provisions, stating:

While freight is referenced in the definition of passenger port facilities, most freight is not associated with passengers. Arguably freight is the main purpose of the Cook Strait ferry connection, with passengers being an ancillary function, rather than the other way round.

QUARRY ZONE (QUARZ)

2 COMMENTS

Summary

Two submissions were received regarding this subsection. One was supportive while the other submitter was concerned about provisions hindering quarry operations.

Quarry Zone: General

2 comments

Horokiwi Quarries Limited expressed three main issues/areas of specific interest to them, which include the following claims:

- Lack of recognition (in particular policy recognition) of quarry activities within the draft District Plan outside the draft Special Purpose Quarry Zone. The lack of recognition has implications for the expansion of existing quarries as well as greenfield quarry development. Related to this is the lack of distinction between new and the expansion of existing quarries.

- The application of the Special Purpose Quarry Zone to the site (and the potential for this zoning to be applied to the adjoining site to the west).

- The prolific number of overlays that apply to the Horokiwi site and the implications this for the existing operation and the potential expansion of the quarry operation. Particular concerns include the provisions relating to Hilltops and Ridgelines, the boundary of the Coastal Environment as it relates to the Horokiwi site, and the identification of particular areas as Significant Natural Areas.

The other submitter supported the use of Special Purpose Zone for Quarries, noting that some quarries are provided for in the General Rural Zone. In general, they were satisfied these provisions are equal and recommended that provisions in both chapters do not pose unnecessary barriers to quarry activities.

SPECIAL PURPOSE STADIUM ZONE (STADZ)

0 COMMENTS

No submissions were received regarding this subsection.

TERTIARY EDUCATION ZONE (TERT)

7 COMMENTS

Summary

A variety of specific suggestions and amendments were made on this section. Two claimed that some provisions seemed particularly onerous, while two others called for wording clarification.

Tertiary Education Zone: General

2 comment

One submitter proposed that the Tertiary Education Zone and the height control diagram be extended to include the "McLean" site on The Terrace. They added that this site is owned by VUW and will be utilised for university purposes. Another submitter instructed WCC to refer to their "attached letter", then summarised "A Special Purpose Tertiary Education Zone for the Kelburn Campus is supported."

Tertiary Education Zone: Building and Structure Activities

3

comments

Three submitters left comprehensive responses in this subsection. One of these submitters sought an amendment TERT-R5 relating to the additions and alterations to Buildings and Structures visible from public spaces. The submitter requested that reference to "are not visible from *public spaces*", be changed to "...visible from a *legal road*" and that "or located 10m away from a legal road boundary" be added. The remaining two submitters were both opposed to TERT-R5.2 (*Additions and alterations to Buildings and Structures – Restricted Discretionary*) and TERT-R6.2 (*Construction of new buildings and structures*), both submitters viewed these rules as unnecessarily onerous and they were concerned that they will expose University applications to significantly greater risk, delay, cost and uncertainty. These submitters sought an amendment to change the Restricted Discretionary Activity status of these rules back to Controlled Activity status.

Tertiary Education Zone: Effects Standards

2 comments

Two submissions were made in this subsection. One comment was in regard to TERT-S1 (*Maximum Height*). This submitter was in support of the building height control provisions and the height control diagram in TERT-S1 S1 (*Maximum Height*). The second submitter in this subsection sought that the wording of TERT-S2 (*Height in relation to boundary*) be amended to limit more clearly the applications to only those boundaries that adjoin another zone. They offered the suggestion that this can be achieved by replacing "...from all side and rear boundaries", with "from the adjoining boundary of a site not within the TERT".

Summary

Submissions were in favour of increasing permitted activities in the Waterfront Zone, or suggested amendments, deletions or clarifications on text to enable more people to make use of these areas.

Waterfront Zone: General

2 comments

Two submitters left comments on this subsection. They were largely specific text changes, the first of which expressed a need for the Introduction to incorporate the principles of the framework more clearly.

Rather than a neutral statement reflecting the past, this need to be changed to an active statement of commitment that reflects the Waterfront Framework principles.

This commenter also argued that the Introduction and Cross References sections have a lack of recognition of natural hazards.

The second response comes from Queens Wharf Holdings Limited (QWHL), owner and part owner of two properties on Queens Wharf. This submitter showed general support for the specific approach to buildings on Queens Wharf. They offered suggestions for some amendments within a number of provisions. QWHL suggested a correction to planning maps to identify Queens Wharf buildings as specific controls apply to them in the Waterfront Zone. The submitter expressed their support for specific statements and Rule WFZ-R12.3 (*Alterations or Additions to Buildings and other Structures – Controlled*), 18.5m height. They offered suggestions for the correct reference to notification status in WFZ-R12.4 which should be WFZ-R12.3 (*Alterations or Additions to Buildings and other Structures – Controlled*). Further support was shown for the measurement change to "above ground level", but only if this does not result in a reduced maximum height of 18.5m when measured above mean sea level. QWHL sought clarification as to whether WFZ-R12.4 (*Alterations or Additions to Buildings and other Structures – Discretionary*) would apply if the more eastern address on Queens Wharf owned by the submitter were to be replaced by a new building.

Waterfront Zone: Objectives

1 comment

One submitter commented in this subsection. They showed general support for WFZ-O3 (*Protection of public open spaces*), on the basis that the mapping of Public Open Space is extended to reflect the current situation relating to Frank Kitts Park. They elaborated by stating that this objective should refer to the defined term of Recreational Activity so that it clearly incorporates passive recreation. They also raised the need to acknowledge these areas in times of civic emergency.

Waterfront Zone: Policies

1 comment

One submission was made in this subsection. The submitter made a request for changes to be made to WFZ-P1 (*Enabled activities*). They requested that Public Transport and Visitor Accommodation be removed as enabled activities, going on to say that this should be a managed activity under WFZ-P2 (*Managed Activities*). The view that Visitor Accommodation should not be able to occupy new buildings and ground floors of any buildings in the zone was expressed by this submitter.

They went on to make suggestions for some specific wording changes within these provisions, along with some further alterations and amendments. Industrial activities should not be permitted in Waterfront Zone land. They also suggested that Item 1 in WFZ-P2 (*Managed Activities*) should be shifted to WFZ-P3 (*Incompatible Activities*). The submitter made the suggestions to add to WFZ-P4 (*Access, Connections and*

Open Space) to highlight public open space role and clarify the meaning of 'harbour edge', and clarify meaning of 'reflect their visual prominence' in provision WFZ-P6 (*Development of Buildings*). A map change and a suggested wording change were sought for WFZ-P7 (*Protection of Public Open Space*).

Waterfront Zone: Land Use Activities

1 comment

One submission was made in this subsection. The submission covered a range of areas, with some suggested alterations/deletions within provisions WFZ-R6 (*Public Transport Activities*), R7 (*Visitor Accommodation Activities*), R8 (*Residential Activities*), R9 (*Industrial Activities*), R12 (*Alterations or additions to buildings and other structures*) and R13 (*Construction of new buildings and other structures*). This submitter requested the deletion of WFZ-R6 (*Public Transport Activities*). They stated they could accept Public Transport Activities within the Waterfront Zone with limited stops on the city edge of the Zone.

The definition of Public Transport Activities is so broad there would be no ability to consider the impact of potentially major new facilities.

They generally opposed Visitor Accommodation activities within the Waterfront Zone, and requested the deletion of WFZ-R7 (*Visitor Accommodation Activities*), including its mention in R8 (*Residential Activities*). The submitter commented that Industrial Activities should be non-complying, requesting the deletion of WFZ-R9 (*Industrial Activities*). Several other alterations/amendments to the provisions within this subsection were suggested.

We have particular concerns about the interpretation of the aggregate area rule, particularly given that many of the public open spaces are very small already.

Summary

Submissions queried whether specific aspects of provisions would achieve desired results, and while there was some broad support for many subsections, there were questions about transport accessibility of greenfields development, as well as around the impacts that such developments have on climate change and carbon neutrality goals.

An array of points specific to certain provisions were made.

Kilbirnie Bus Barns (DEV1)

0 comments

No submissions were received regarding this subsection.

Lincolnshire Farm (DEV2)

6 Comments

Summary

An array of specific points were made regarding removing or amending some provisions.

Lincolnshire Farm: General

3 comments

Submissions made varied points. One submitter expressed a need for provisions regarding the link road to be removed from the Plan, stating:

NZTA has had 15 years to design and build this link road and it has seriously impacted the development pattern and timing to date. NZTA have designation powers that should be used once the design is finalised. It is unfair to continue to have a placeholder on the land and affect the delivery of outcomes for the zone.

One stated that the reference to public transport is insufficient while another wanted to see provisions included within Lincolnshire farm development. They proposed the minimum net floor area is too small and that there is insufficient daylight provision, as well as other specific text changes.

Lincolnshire Farm: Effects Standards - General Industrial Area 3 comments

Three submissions were made to this subsection. Of the three, two were opposed to certain provisions and one sought clarification for communal space minimum requirements within DEV2-S19 (*Outdoor Living Space for Multi-unit housing – General Residential and Medium Density Residential Activity Areas*):

We seek clarification on the communal space minimum dimension rules and how to apply them. Previously, the minimum dimension rules applies to all dimensions of the space.

The two respondents who showed opposition to provisions did so on the following grounds:

Oppose the 30% permeable surface are seeking amendment to 20% permeable in MRZ given 50% site coverage re: DEV-S15 (Permeable surface area – General Residential and Medium Density Residential Activity Areas).

Oppose with amendments General Residential head banner to read Lincolnshire farm.

Upper Stebbings and Glenside West (DEV3) 28 comments

Summary

Submissions on the subsections addressed a range of provisions. While many were in support, those who were not supportive wanted clarification on specific points or disputed whether certain goals are practically achievable. Questions arose around transport, connectivity and whether greenfields developments were appropriate in light of carbon and climate change concerns.

Upper Stebbings and Glenside West: General 14 comments

Several general submissions were made, with opinion divided between those who were supportive overall (albeit with suggestions or amendments) and those who raised concerns or expressed opposition.

Within the generally supportive submissions, multiple points were made on various provisions, but each expressed broad support with concerns about specific aspects.

One submission offered firm support for an array of area specific matters pertaining to this subsection. The submitter suggested that Council enforce principles in the proposal such as limiting the potential for future infill housing; ensuring street layouts are not altered; minimising earthworks; and protecting stream, bush, and ridgelines. There was strong support for a connection to Tawa, with a graded road through the upper half of Arohata Prison land favoured. They advocated for Glenside West to be reclassified as Large Lot Residential, arguing this:

...would allow housing to be constructed on larger lots, thus reducing the impact of land clearance on natural vegetation, earthworks on sedimentation, hard surfaces on storm water runoff and the visual impact of a concentrated housing development.

The submitter cited several provisions, including support for DEV3-R4 (*Informal Recreation Activities*) and DEV3-R5 (*Organised Sport and Recreation Activities*), and concern about height limits of DEV-S1 (*Maximum Height*) having adverse impacts. Other specific suggestions included that the Ridgetop Overlay be at least 20m vertical and an amendment to the Ridgelines and Hilltops Overlay.

One submitter generally supported Upper Stebbings provisions but requested adjustments to the extent of built areas and the housing densities, and reported concerns that streams are incorrectly mapped and labelled. They also wanted development to not depend on connector roads.

Another submission expressed general support for the proposals for Upper Stebbings Valley but wanted major changes for Glenside, specifically around the potential for the development allowing a concentration of 8m-plus buildings DEV3-S1, the impacts of earthworks (see comment below for suggested amendment), as well as measures to protect the visual amenity of ridgetop areas.

Our minimum requirement for these areas is that earthworks are kept to a limited volume so that each house is required to be built on its own platform.

Two submitters made suggestions centered on biodiversity and waterways. One submitter wanted to see updates to the provisions surrounding minimum area and dimensions and updates to sunlight hours, while another submitter supported SNAs for Glenside West but expressed concern that they will not achieve appropriate protection.

A small number of submitters raised concerns which predominantly revolved around access (i.e., a lack of active, public or private transport access), the disruption that the development would bring, or impacts on biodiversity.

For one submitter, the main concern was the lack of road connection from Upper Stebbings Valley to Tawa, and that there is little discussion in The Plan on the Glenside West to Middleton Road connection. The submitter argued Upper Stebbings Valley should not be a cul-de-sac development and was concerned about land-banking. They also made the following points: sections must preserve ridgeline contours and use them effectively; the area between Greyfriars and Upper Stebbings Valley must not be included in SNAs; provisions should be made for public transport connections to surrounding areas (bus and train); and lastly, they contended that The Plan for Upper Stebbings Valley presents a narrow view and should be withdrawn and revised with necessary changes made.

Submitters highlighted problems with access to/from the following areas: Greyfriars Crescent and Tawa to Stebbings Valley, “access to the north”, between adjacent suburbs, and between Churton Park and Island Bay. One submitter noted that The Plan mentions use of both Corrections land and private land for potential road access, and queried whether or not this was feasible given that “that commitments were made at a political level”. Another submission briefly noted that public transport was inadequate to cater to anticipated need, adding that the area is “completely excluded from the bike network plan”.

One submission included comments on cycling, noting that in light of an anticipated increase in cycling and use of electric bikes:

A good direct cycle route from Upper Stebbings to Redwood station would be an attractive option. The connection would also provide a safer route for cyclists heading to or from Wellington along Middleton Road.

This submitter also worried that measures proposed to increase connectivity would impact negatively on native vegetation that is in the process of regenerating. To mitigate the visual and ecological impacts of this they suggested:

Designing the link sensitively. Techniques that could be incorporated could include having a split carriageway at different levels and possibly alignments as the link sidles up and over the ridgeline.

One submitter opposed the current form of planned future urban development for Glenside West – specifically, the property at 395 Middleton Road. They reported significant concerns pertaining to the destruction of the special rural character of this area; lack of access by active and public transport to the development; noise; earthworks; and maintenance of the hilltop and ridgeline aesthetic.

They suggested:

- > Glenside West should be reclassified as Large Lot Residential, and any Built Area given an Activity Status of ‘Discretionary’.
- > Earthworks should be kept to a minimum with individual building platforms instead of large escarpment/platforms.
- > The Ridgetop area should be widened to allow for meaningful vertical visual protection.
- > The Subdivision Design Guide section G13 covering earthworks should be greatly strengthened.

- > The Residential Design Guide, section on Build Form should be strengthened to include form, colour and light pollution for housing that is visually prominent.

Upper Stebbings and Glenside West: Objectives 2 comments

This subsection received two comments, one addressing the meaning of “well-connected” in DEV3-O1 (*Objectives – Purpose*) considering that “there is one route serving this area”, and another pertaining to provision DEV3-O3 (*Objectives – Amenity and Design*), in which concerns were raised about greenfield development going against aims of compact and accessible development.

Upper Stebbings and Glenside West: Policies 2 comments

The two comments received on this subsection addressed concerns about where the “further anticipated urban development” would be located in provision DEV3-P3 (*Potentially Compatible Activities*), as well as the following concerns: objective not met in provision DEV3-P5.2 (*Coordinated Development*) as it will cause traffic congestion; open space recreational tracks are merely aspirational in DEV3-P5.5 (*Coordinated Development*) as marked tracks are across private and Corrections land; and issues with DEV3-P5.6 (*Coordinated Development*) as ridgelines affect transport routes.

Designations 4 comments

Summary

The small number of submissions each note specific points relevant to each of the bodies outlined below.

Airways Corporation of NZ (ACNZ) 0 comments

No submissions were received regarding this subsection.

Chorus NZ Limited (CNZ) 1 comment

Chorus NZ Limited 1 comment

One submission was made within this subsection, on behalf of Chorus New Zealand Limited. They made a specific request regarding Wrights Hill designation (CNZ14). As well as another correction: “... ‘Section 15 Upper Kaiwharawhara District’ has the listed owner as Her Majesty the Queen, while appellation Lot 1-4 7-11 16-24 Deposited Plan 91378 is owned by Chorus New Zealand Limited. The designation should be attached to the appellation listed”.

KiwiRail Holdings Limited (KRH) 0 comments

No submissions were received regarding this subsection.

Kordia Limited (KL) 0 comments

No submissions were received regarding this subsection.

Meteorological Service of New Zealand Limited (MSNZ) 0 comments

No submissions were received regarding this subsection.

Minister of Corrections (MCOR) 0 comments

No submissions were received regarding this subsection.

Minister of Defence (MCOU) 0 comments

No submissions were received regarding this subsection.

Minister of Police (MPOL) 0 comments

No submissions were received regarding this subsection.

New Zealand Media and Entertainment (NZME) 0 comments

No submissions were received regarding this subsection.

Waka Kotahi New Zealand Transport Agency (NZTA) 0 comments

No submissions were received regarding this subsection.

Prime Minister (PM) 0 comments

No submissions were received regarding this subsection.

Spark New Zealand Trading Limited (SPK) 1 comment

Spark New Zealand Trading Limited 1 comment

One commenter made a specific request for Karori Exchange to be included as a Secondary Spark Designation.

Transpower New Zealand Limited (TPR) 1 comment

Transpower New Zealand Limited 1 comment

One submitter responded to this subsection. They showed support for the location of all relevant National Grid provisions within the Infrastructure Chapter as it avoids duplication and provides clear set of rules. Specific amendments/corrections were sought to designations TPR4 (*Oteranga Bay Terminal Station*), TPR2 (*Wilton Substation*), and TPR5 (*Te Hikowhenua Shore Electrode Station*).

Wellington City Council (WCC)

0 comments

No submissions were received regarding this subsection.

Wellington Electricity (WEL)

0 comments

No submissions were received regarding this subsection.

Wellington International Airport Limited (WIAL)

0 comments

No submissions were received regarding this subsection.

Greater Wellington Regional Council (WRC)

1 comment

Greater Wellington Regional Council

1 comment

One submission was made in this subsection. The respondent expressed concern over a mapping error within the W4 designation, stating “the designation has been incorrectly mapped for years”. A recommendation was made for WCC to approach GWRC to do the work to ensure the mistake does not roll over into the new Plan for another 10 years.

Part 4 Appendices, Design Guides and Schedules

About the submissions on Part 4

- Two hundred and seventeen submissions were received on Part 4 of The Plan.
- Respondents could provide more than one submission, which resulted in submissions being received from 148 submitters: individuals (126), organisations (21), or local government (1) submitters.
 - The 126 individuals provided 153 submissions
 - The 21 organisations provided 51 submissions
 - The 1 local government provided 13 submissions
- Note that submitters often commented on one section regarding aspects taken from another part, i.e. provided a submission on strategic direction while making specific points regarding provisions. For added clarity, in some instances submissions have been discussed in a more appropriate place.
- The discussion that follows is ordered by the sections, sub-sections and provisions of the plan.
- Where no submissions were received on a particular section or sub-section this has been identified.

Appendices

28 comments

Summary

Each subtopic within this section received 5 or fewer comments, many of which pertained to different topics. There was a mixture of agreement with provisions, some opposition, and many text changes, amendments, or statements expressing points of concern.

Historic Heritage Advice Notes (APP1)

No submissions were received regarding this subsection.

APP2 – Biodiversity Offsetting

5 comments

A small number of disparate comments were received on this subsection. Two submitters added the text “which must be a minimum of 10 years” to the third point of the provision beginning “Proposing a biodiversity offset”, while another indicated suggested text changes in red (only visible to WCC analysts).

One submitter called for an expansion of the word “taxa” to include more detail. Another submitter claimed there is conflict between principles 5 (*Like-for-like*) and 9 (*Trading up*), and that the provision should be amended to align the wording with that of LGZN.

APP3 – Biodiversity Compensation

4 comments

Of the small number of submissions, two proposed specific text changes while the another added text (indicated in quote as underlined) to the provision concerning time lags:

The delay between loss of indigenous biodiversity at the impact site and gain or maturity of indigenous biodiversity at the compensation site must be minimised and identified within the compensation site management plan.

A single general submission included suggested amendments to Principles 2 (*Limits to biodiversity compensation*) and 3 (*Scale of biodiversity compensation*), and a statement to the effect that Principle 8 (*Trading up*) is redundant.

APP4 – Permitted Noise Standards

4 comments

The four submissions to this subsection were as follows. One submitter called for a single set of controls for aircraft operation noise, and another wanted to see Noise Table 16 amended to be consistent with the current District Plan and MDRZ.

There was a suggestion that “conceptual boundary” should read “national boundary” so that the definition is available, and, lastly, a submitter felt that the tables of noise limits are difficult to use/follow. They suggested that all noise limits be combines into a single table to make standards more efficient to apply.

APP5 – Fixed Plant Noise Standards

2 comments

One submitter stated that Tables 22 to 26 should be combined into a single table and another expressed concern that the method for measuring noise limits is not best practice. They suggested an amendment to measure “from the nearest sensitive activity, not at the boundary”, and “over the full period of operation” rather than a 15 minute period. They added:

We recommend 55 dB LAeq measured at the nearest sensitive activity.

APP6 – Permitted Noise Standards for Temporary Activities

0 comments

No submissions were received regarding this subsection.

APP7 – Temporary Activities Event Management Plan 0 comments

No submissions were received regarding this subsection.

APP8 – Quantitative Wind Study and Qualitative Wind Assessment – Modelling and Reporting Requirements 0 comments

No submissions were received regarding this subsection.

APP9 – City Centre Zone & Special Purpose Waterfront

2 comments

City Centre Zone & Special Purpose Waterfront Zone – Minimum Sunlight Access – Public Space Requirements, City Centre Zone and Special Purpose Waterfront Zone – Minimum Sunlight Access and Wind Comfort Control – Public Space Requirement 1 comment

The single submitter agreed with the provision, stating: “We agree with these requirements”.

City Centre Zone & Special Purpose Waterfront Zone – Minimum Sunlight Access – Public Space Requirements, General 1 comment

The single submitter agreed with the provision, stating: “We agree with these requirements”.

APP10 – Multi-User Ferry Precinct and Inner Harbour Port Precinct Masterplan Requirements 3 comments

Three submissions expressed agreement with this subsection, two stating:

We agree with these requirements.

The other submitter suggested no amendments and added to their broad support that this was needed:

...to enhance access by active modes and public transport and to ensure good transport network integration.

APP12 – Lincolnshire Farm Development Area 5 comments

Three comments were made on the requirements for Lincolnshire Farm development, each taking issue with the setting aside of land for community facilities/areas that is required to be flat. One concerned a proposed school, another was for community facilities, and lastly, for park and recreation reserve provision (4-6 ha).

In each case, the submitter suggested that the requirement for this land to be flat is unreasonable given the topography and the difficulty in obtaining consent for land works. Each submission called for this to be removed or amended to read “as far as is practicable”.

Two additional submitters commented on the Lincolnshire Farm Development Plan. One described an attachment they included that is annotated with comments. The other expressed general support for The Plan, and included some suggestions about road alignment and boundaries. They also sought confirmation that the “lines will not be taken literally, as they so often have”.

APP13 – Upper Stebbings and Glenside West Development Area

6 comments

A number of concerns were raised about several provisions in three submissions to the subsection pertaining to Requirements for Upper Stebbings. One submitter called for amenities to be provided for buses and bus drivers, including toilets, and electric bus charging areas. Another called for a connector road between Greyfriars and Upper Stebbings Valley, noting that:

Because there are no residential properties fronting onto it, the grade and width requirements could be relaxed.

A few points were made on provision DEV3-APP-R1 (*Open Spaces*), namely, that a commuter cycling and walking path should be added, that land under transmission lines needs to be “defined” in ways which enhance both Lower Stebbings Valley and Upper Stebbings Valley and “link the two communities together”, and:

Need to make it clear that reserves are 0.25 ha EACH. Timing of neighbourhood parks and dog areas needs to be significantly advanced.

Two submitters had concerns about the requirements for Glenside West, with particular reference to provision DEV3-APP-R5 (*Roads*), about the construction of dwellings needing to occur after an intersection is built. One requested that the provision “be removed in its entirety”. The other expressed concern, suggesting that:

This clause should come into effect prior to the release for sale of any of the residential lots in the development area.

Lastly, the single submitter to the Upper Stebbings and Glenside West Development Plan called for higher quality map with the following features changed: better definition of transmission lines; the non-inclusion of tracks over private land; identification of existing reserves and SNAs; improved key to show symbols as well as colours; and the inclusion of street layouts.

APP14 – Wind Chapter Best Practice Guidance Document

0 comments

No submissions were received regarding this subsection.

Summary

Submissions were concerned with extending character areas, protecting and promoting aesthetically pleasing streetscapes (including heritage), limiting building heights in character areas, and limiting the damaging aspects of development (including attention to water and wetlands, and reducing sediment and runoff from development).

There was blanket opposition to increases in maximum heights in Oriental Bay, with Hay Street consistently described as unsuited to building heights of 21m.

Introduction

0 comments

No submissions were received regarding this subsection.

Centres and Mixed Use Design Guide

2 comments

One submitter expressed opposition and stated they would like to see the design guide be non-statutory. The other submitter suggested an amendment to page 13, so that the internal spaces guideline does not apply to "specific use" buildings.

Residential Design Guide

20 comments

RESIDENTIAL DESIGN GUIDE: GENERAL

6 COMMENTS

The small number of submissions made comments about strengthening or protecting water outcomes or wetlands.

Two submissions noted wetlands in comments, one calling for additional provisions to protect and enhance them and the other stating that wording could be clarified to avoid suggesting that wetlands may be used as stormwater collection areas. This submitter also stated that G23 (*Give a sense of human scale at the publicly occupied edges of buildings. If a building contains features, which are comparable in size with the human figure, the former may be said to have human scale*) and G19 (*Opportunities for regeneration of waterways and stream ecology should be pursued on sites where waterways exist either above or below ground*) contradict one another, and that The Plan fails to frame water sensitive solutions under the banner of "water sensitive design".

One made the general point that water conservation should be emphasised and then went on to state that regional standards for water services needs to be referenced through all design guides, and noted that there is mention of septic tanks in the Rural design guide.

Lastly, one submitter stated in simple terms that:

Strengthen wording of water outcomes for all design guides to require enhancement.

One lengthy and one succinct submission were made to this subsection.

The shorter submission called for G72 (*Direct lighting away from windows in neighbouring buildings*) be strengthened to minimise long distance and cross valley light pollution; and, felt that Design Guides

should encourage visually prominent houses to harmonise with the landscape with the use of natural materials and colours, for example.

The more substantial submission contained commentary around ways in which to make streetscapes more attractive. These centered on reducing car access and dependency, traffic calming, grouping high rises on water edges and street ends, high window heights, and reducing the visual impact of street-facing garaging.

The submitter referenced European design in their comments, expounding the benefits of aesthetically pleasing design. For example:

Parapets or Eaves - Buildings appear more attractive if they have appropriately dimensioned 'foreheads' (parapets) or 'fringes' (eaves), like faces which are part of our most intense visual interest (people-watching).

CHARACTER PRECINCTS DESIGN GUIDE

14 COMMENTS

The several submissions to this section supported character areas, and wanted to see them extended or protected. Many outlined the intrinsic value and importance of character areas and each made several points, the most prevalent of which was for Tutchon Avenue to be included in the nearby proposed Character Area. One submitter offered the rationale that its houses have characteristics similar to those of neighbouring historically significant areas.

A small number of submissions argued that Character Areas be extended or protected. The following words and phrases were used to express this: prevent demolition (in character precincts); preserve and enhance historic inner city suburbs; and, reinstate protection of heritage houses.

Most submitters wanted to see character maintained: one suggested reinstatement of the pre-1930 demolition rule, and another called for incentives such as "sponsorship" for people to repaint wooden homes. "New development" was thought to lead to a loss of continuity and character.

One person asked that the original design guides are reinstated, going on to state that this would make it:

more clear to modern builders / developers about what is required to maintain the particular character of the houses in those areas.

Two submitters opposed increasing densities in Te Aro (citing infrastructure pressure and heritage retention), and another opposed densification of historic inner city suburbs. One of these argued that the Character Precinct Kent Terrace should be zoned Mt Victoria MDRZ not CCZ. One of these submitters argued that The Plan should include design guidelines for building next to cottages. They went on to state that recession planes should be less restrictive and wanted to see more care of the green values and ecosystems. They noted that the walking catchment idea needs to be revisited.

Two proforma submissions sought expansion of the character precinct to include more of Mt Victoria and the strengthening of the protection of the existing character. They supported the addition of areas recommended by Heritage New Zealand to the Draft Spatial Plan proposed character areas. And they sought the rezoning of the edge of Kent Terrace to Medium Density Residential Zone, from City Centre Zone.

One longer submission to this subsection expressed support for existing heritage listings and heritage areas, including new ones. They called for several changes including: the Thorndon Heritage Area to be extended north to the motorway intersection; new "heritage site curtilage controls"; a new "dereliction rule"; a new rule for facadism to be a last resort; the new MDRS rules to apply in all inner suburbs, including within walkable catchments; Residential Character provisions revised; character areas expanded based on a 2019 Boffa Miskell report; and, the Newtown Alternative Plan to apply to heritage shopping precinct and neighbourhood planning provisions, including to inform design guides and local master

plans. The same submitter opposed the east side of Thorndon as CCZ and would like to see new character precincts in identified areas of Thorndon, Mt Cook, Mt Victoria, The Terrace area, Aro Valley, and Newtown.

Two submissions included one in which the submitter objected to a property being within a Character Precinct and who wanted increased density, and one who stated that character precincts do not protect historic heritage values.

Finally, two submitters identified a spelling mistake - use of "compliment" instead of "complement".

CHARACTER PRECINCTS

0 COMMENTS

No submissions were received regarding this subsection.

COASTAL EDGE

0 COMMENTS

No submissions were received regarding this subsection.

Oriental Bay Height Precinct Design Guide 19 comments

A moderate number of submissions were received on this subsection. Submitters consistently opposed the proposed increase in maximum heights for Oriental Bay. Around half phrased their opposition to height increases by stating that they support either the Oriental Bay Height Area or the status quo, as the following example shows:

1. I support the plan's proposal to maintain the Oriental Bay Height Area (i.e. the status quo to remain on the Parade), 2. I oppose the proposed 21-metre (6-plus story) height limit in the plan for Hay Street and Baring Street.

The remaining half expressed their opposition by specifically stating that they were against the proposed increases to maximum heights, in several cases Hay Street was cited as particularly unsuited to building heights of 6+ storeys. The following quote is a typical example of the many in which people cited slope stabilisation issues, the risk of slips, infrastructure pressure, and safety for road users (i.e., due to the steep and narrow road).

A slip on this terrain would result in major egress problems to all people located up and beyond no. 8 driveway in Hay Street and Telford Terrace. We do not want another slip of Ngaio Gorge likeness. Any new structures built up to 6 stories would require several car spaces and added stress on roading and water infrastructure.

One final submitter wanted to see a new character precinct for Lower Hay Street, Oriental Bay. Lobby group Keep Wellington's Character (KWC) proposed this to "reflect its special heritage and characteristics".

Mt Victoria North Townscape Precinct Design Guide 2 comments

The two submissions called for increased character protection, and the strengthening of character precinct and design guides. Both wanted to see Tutchon Avenue included as part of the Character Area, one stating that this street is not suitable for 23m tall buildings, and the other providing the quote below:

WCC should include Tutchon Avenue in the Porritt Avenue character area. It is illogical to exclude Tutchon Avenue, a tiny dead-end street barely one car's width, from the Porritt Avenue character area. There is no explanation or justification for this decision and appears to be a mistake.

The longer of the submissions rejected the following: the minimum daylight access rule; and, the height exemptions for assisted housing. They supported reinstating the pre 1930's demolition rule and wanted to see Kent Terrace zoned as Mt Victoria MDRZ instead of CCZ.

PAPAKĀINGA DESIGN GUIDE

0 COMMENTS

No submissions were received regarding this subsection.

Heritage Design Guide

0 comments

No submissions were received regarding this subsection.

Signs Design Guide

0 comments

No submissions were received regarding this subsection.

Subdivision Design Guide

1 comment

The single submitter to this section of The Plan highlighted the environmentally damaging aspects of earthworks, and requested that G13 (*Minimise any earthworks disturbance to the natural ground form*) be strengthened to better manage such impacts. They suggested that superficial earthworks be reclassified as discretionary and that this be enforced. The submitter attached images of water runoff, sediment, and excessive earthworks in support of their submission.

Rural Design Guide

2 comments

One submitter requested a specific property in Grumman Lane be rezoned from Rural Zone to General Residential Zone and remove ridgeline and hilltops. They included supporting documentation as an attachment, which included details of site, land use, visual and ecological values, residential development, and a proposed traffic cap.

The other submitter on this section sought recognition in the Rural Design Guide of the presence of existing wind farms in these areas to reflect what actually exists in the landscape; they stated:

The Draft Design Guide is silent on the physical presence of existing wind farms. It would be more meaningful and relevant if it reflected the reality of what actually exists in the landscape.

Summary

Commentary on schedules was dominated by objection to SNA designations on privately owned property. There were a substantial number of submissions in opposition to SNAs on private land, and, while several supported the intent of SNAs, the efficacy and fairness of the schedule was widely challenged.

Heritage was also of great concern, with most who submitted on this topic calling for retention of heritage and character areas. Intensification measures that impinge on character and/or amenity were not well supported. Heritage protections were only challenged where they were viewed as limiting the ability of the property owner to make changes to their properties. Many called for heritage precincts to be extended, or for certain properties to be included.

SCHEM1 – Heritage Buildings

5 comments

The small number of submissions to this section were three in which the heritage listing of a building was opposed, one in which this was supported, and one in which the submitter wanted to see heritage rules relaxed for certain parts of a building.

Those in opposition included one who expressed their disappointment that Wesley Church, 75 Taranaki Street was not listed as a Heritage Building and requested that it be added to the list. Another, who owns a property on Willis Street, expressed opposition to the building being listed as a heritage building on the basis that the existing building will not be worth the strengthening costs. They also stated that the heritage status of the building would prevent them from building apartments, which they would consider a loss of property rights and would prevent the opportunity to provide quality housing. The other submitter opposed the heritage listing of the Robert Stout Building.

The single supporting submitter approved of the addition of their co-owned address on Campbell Street, to the schedule of historic heritage items. They expressed the view that greater protection could be afforded to heritage buildings, while still intensifying in inner city and fringe suburbs.

Lastly, one submitter wished for the curtilage of the heritage listed Hunter Building be retained; they stated that this was:

...so that works outside of the curtilage are not unnecessarily subject to the heritage rules of the Plan.

SCHEM2 – Heritage Structures

1 comment

One submission was made to this subsection. The submitter, who identified themselves as the Chair of the Tawa Historical Society, wished to have items added to schedules 2, 3 and 4. They requested that the Tawa War Memorial and the World War I Memorial Rock be added and that the existing memorial area be enlarged to include the other memorials now in the area.

SCHEM3 – Heritage Areas

17 comments

Several submissions were received on this subsection, almost all of which supported heritage areas and many of the authors of which wanted to see these either extended or have properties added to them.

Around a quarter of submissions were calls for specific properties to be added to or included within Heritage Precincts/Areas. These included: Tawa Cemetery and Tawa Flat Railway Station site added to Schedule 3; an address on Glenbervie Terrace; "Old Hall" and "Drama Christi" added to the heritage list; a property on Porritt Avenue added to protected list; and a "cluster" of buildings on Queens Drive and Lyall Parade, specifically, three addresses on Lyall Parade and one property on Queens Drive.

Submitters often outlined the special characteristics of the buildings or the uses of buildings they nominated for extra heritage protection, for example:

This property should be included as the house is a significant pre-1930s house built by Prime Minister Massey for his daughter.

I would particularly like to see 49 Porritt Ave heritage protected because former owner Kate Edger ran a private girls' school there in the 1890s when opportunities for girls' education were limited, and it is therefore part of the story of the development of girls' education in Wellington.

Around a quarter of submissions expressed support for certain heritage areas, namely: the Porritt Ave Heritage Area; Thorndon Heritage Area; a yet to be defined cluster in Roy Street, Holloway Road and Aro Valley; Moir Street Heritage Area; Armour Ave Heritage Area; Doctors' Common Heritage Area; and, Elizabeth Street Heritage Area.

Two submissions opposed the blanket classification of 75 Taranaki Street, the Wesley Church site, as heritage; however, they both supported the heritage classification of certain buildings on this site. One argued that the blanket classification would hinder the ability of the church to provide services suited to the changing needs of the community.

Two additional submissions opposed intensification in Mt Victoria. One argued that high rises adjacent to heritage areas will impinge upon the character value of said area.

I'm sure with further consideration you could find other land that is suitable for apartment blocks. The destruction of Mt Victoria isn't necessary. I wish to appeal against your decision.

The other argued that The Plan would fail to protect the character and heritage of Moir Street and that CCZ development on Hania Street will have detrimental impacts in the form of shadowing, privacy, wind and dominance. They wanted to see amendments to CCZ-05 (*Amenity and Design*), CCZ-P5 (*Urban Form and Scale*), CCZ-S3 (*Character Precincts – Adjoining Site Specific Building Height*) and the creation of new policy for heritage areas in MDRZ.

Of the three remaining submissions on this subsection, two were lengthy, and one succinct. The shorter of the submission was a request that a specific Newtown property be added to the heritage schedule, claiming that 6-8 storey apartments is a bad idea. They added that the present state of infrastructure may not cope with densification.

One submission supported SASM Nominations for Heritage sites and buildings and the rules for repair and maintenance of heritage areas. They suggested that "demolition by neglect" and "façadism" should not be tolerated. They went on to state that the proposed Thorndon precinct is too small, that view shafts need to be preserved, and lastly, that pre 1930's demolition rule should be retained.

The last submission called for the zoning of Hobson precinct to be amended to MDRZ. The submitter supported the proposed heritage designation in Thorndon, however, they considered it too small and were concerned that the schedule of heritage items is inadequate and an inaccurate representation of Wellington. Other concerns included: that historic heritage has not been given enough weight in the submission; that The Plan will not solve housing supply and affordability problem; and that there should be a focus on brownfield development.

SCHEd4 – Archaeological Sites

1 comment

One submission was made in this subsection. The submitter made the suggestion that the old rail line through Tawa Valley (pre 1937) be formally added to the list of Archaeological Sites. They also provided several other suggestions for amendments and additions to this provision.

SCHEd5 – Viewshafts

0 comment

No submissions were received regarding this subsection.

SCHEd6 – Notable Trees

0 comments

No submissions were received regarding this subsection.

SCHEd7 – Sites and Areas of Significance to Māori comments

10

A small number of submissions to this subsection included suggested text changes. In one, the submitter wrote that they have “attempted to rewrite this para in plain English”, and go on to give their example. Another has added the word “this”, as shown underlined in the following quoted section of The Plan:

The purpose of the Site and Areas of Significance to Māori this chapter is to identify and protect sites and areas significant to...

Another submitter suggested replacing the word “treatment” with “protection” in the following section:

In addition to this categorisation above, while some sites are historical sites, others are living spaces and contemporary sites that require treatment based on...

Another two submissions include suggested minor wording changes. One submitter expressed support for the DDP, stating:

This is a very important notion that culturally significance is to be decided by Iwi and despite not having a structure or building on it should be treated equally.

Two submitters expressed support of SASM (*Sites and Areas of Significance to Māori*) provisions, one stating simply that “We endorse the kaupapa of this section”. The other submitter showed general support for the areas identified under SCHEd7. They requested that The Plan be amended to include Oku Reserve in Tapu te Ranga – Haewai Precinct.

Remaining submissions were on distinct topics, and include the following.

One submitter reiterated the importance of the Treaty of Waitangi and urged the WCC to uphold its commitments to ensure that iwi and Mana Whenua remain at the forefront of development decisions.

Finally, Wellington International Airport Limited noted that Maupuia Pā and Moa Point near the airport have been heavily modified and potentially removed by land use development over time and on this basis queried how the provisions will be applied.

Note there were similar comments received in three Significant Natural Area (SNA) subsections and because of the consistent points made across all of the submissions, to save repetition these comments have been combined into one section. The sections and comment numbers were: significant natural areas, 60 comments; general, 35 comments; no heading 1 comment.

SNAs attracted a sizeable number of comments almost all of which were in opposition to the designation of land as SNA.

Around half of the submitters opposed SNAs on private land, and just over a quarter opposed SNAs specifically on their own properties, in all cases of which the address was listed or described. Those opposing SNAs on privately owned land offered consistent arguments, mostly related to the injustice of the Council controlling the actions of property owners. Submitters wanted to be able to make decisions about their properties and act on these without seeking permission.

We must be permitted to trim trees on our land as required without seeking consent from the Council. Seeking consent should be required only for activities that would currently require consent.

Private landowners must be permitted to continue doing simple activities, such as routine maintenance, without involving Council.

The proposal is very punitive in terms of the negative pecuniary effects on the property owners.

A moderate number of submitters called for compensation for land designated as a SNA, and several challenged the legality of imposing SNA rules on private land, some citing the RMA in comments.

Several submitters who suggested amendments most often wanted to see trimming of vegetation allowed.

While several submitters supported the intent of SNAs, they did not want to bear the brunt of the SNA requirements, including costs, lack of agency over their own land, and the potential for SNA requirements to reduce the value of their land.

A moderate number of submissions were strongly worded, and many were lengthy descriptions of ways in which certain aspects of the SNA designation were arbitrary, nonsensical, or not workable; for example, one submitter objected to their vegetable garden being included in a SNA designated area and several noted that the designations of land as SNA could encourage land owners to remove some or all vegetation in advance of the designation being finalised.

Submitters used the following words and phrases to describe the SNA designations on private property: discriminatory; “a shambles”; disturbing; prohibiting “reasonable use” of own land; a “land grab”; onerous; devious; and underhanded. One person described how the process had impacted on them follows:

I truly know how Tangata Whenua felt by having their lands confiscated and this SNA is a triple whammy for my family.

Several submitters pointed out that there are inadequacies and inequities with SNA rules viewed as arbitrary, such as that some land owners have already taken measures to increase or improve the natural coverage of their land by planting natives themselves, while others have not.

The imposing of SNAs directly penalises landowners who have cared for and encouraged the growth of natives on their sections.

Some called for compensation so that Council can purchase land for SNAs rather than subjecting property owners to rules. A small number queried the efficacy of the designation as to the environmental outcomes, and a few submitters challenged the legal basis for SNAs as they pertain to private property.

A small number cited specific properties that submitters wished to be excluded from the SNA designation, these are in: Meadowcroft Grove, Johnsonville; Meadowcroft Grove, Johnsonville; Clark Street, Khandallah; and, two submissions requesting that a property in Holloway Road, Aro Valley have its designation as an SNA removed.

A small number of submissions either had concerns about the SNA section, or wanted to see amendments to it for it to proceed. Concerns were, again, around the impact on private property, and included whether the SNAs adequately consider the wider planning, and one person who requested a site visit to their property (in Kaiwharawhara) to discuss amending the SNA boundary to a more pragmatic position due to pipe network, and some guidance for best placement of new native planting.

A long and detailed submission from Tyers Stream Facebook Group outlined an array of amendments in their opposition to further development and intensification in the catchment but the group expressed support for the inclusion of Tyers Stream Reserve and adjacent areas of private land as SNA (WC114- *Site Name: Tyers Stream Reserve, Khandallah*).

One submitter made several requests and raised concern about participation and communication from the Council, and requested: to confirm their block of land in South Karori Road in the General Rural Zone; remove their block and the rest of the privately owned land at that address from being subject to the Special Amenities Landscapes (SAL) overlay; and remove their block from being subject to the SNA overlay. This is an example of the specific detail contained in a number of submissions which Council staff have reviewed.

One submitter offered text changes, suggesting "Polhill Reserve" be referred to as "Waimapihi (formerly Polhill) Reserve" to reflect the recent WCC renaming decision.

Several submitters supported the intent of SNAs but felt that the way in which it was imposed was not satisfactory, three of these expressed outright support for SNAs, one wanting it strengthened, and the other calling for it to be extended. One submitter agreed fully with the intent and the enactment of the SNAs. They cited the importance of native tree species and supported "all the listed activities permitted within SNAs that would not require resource consent".

SCHEd9 – Urban Environment Allotments 4 comments

Two submitters wanted their properties removed from the SNA schedule. One address was in Ashton Fitchett Drive, Brooklyn, with the submitter opposing SCHEd9 on the grounds that the designation will "affect the planning and development of our lot". The other stated that:

We are intending to remove these trees in order to allow for development of a new dwelling. Please remove this property (78 Homebush Road) from the schedule.

One submitter opposed any properties zoned General Residential being included as SNAs, and another pointed out that the "cumulative impacts of the residential coastal edge" and SNA controls prohibit any reasonable use of this land.

SCHEd10 – Indigenous Tree Sizes 0 comments

No submissions were received regarding this subsection.

SCHE11 – Outstanding Natural Features and Landscapes

0 comments

No submissions were received regarding this subsection.

SCHE12 – Special Amenity Landscapes

Special Amenity Landscapes, Special Amenity Landscapes

1 comment

The submission made to this subsection requested that greater flexibility be afforded to quarrying in relation to SNA and Special Amenity Landscapes.

SCHE13 – Schedule of High Coastal Natural Character Areas

2 comments

Schedule of High Coastal Natural Character Areas, High Coastal Natural Character Areas

2 comments

Two submissions were made within this subsection. The submitters sought clarity about the geographical extent of 'Terawhiti' and expressed concern that the schedule does not acknowledge the physical presence of the wind farms in the descriptions of the environment of the policy framework of the Draft District Plan. The wind farms have modified the environment and so the submitter is concerned that this inaccurately characterises the natural character of these areas. A request was made that the district plan description of values acknowledges the physical presence of this built infrastructure. The submitter stated that,

One approach would be to identify these existing wind farms in an overlay on the Plan maps, supported by policy recognition and provision for them as lawfully established and nationally important renewable electricity generation assets. And the physical extent of the coastal natural character overlay needs to be specified on a map.

The submitter would like more clarity on the meaning of 'abiotic' and 'experiential' in the Schedule 13 description.

SCHE14 – Building Standards for Indoor Sound Insulation for Noise Sensitive Activities

0 comments

No submissions were received regarding this subsection.

Long submission summaries

Thirty three longer submissions were received in submitters' own formats, these are summarised in the table below.

| Submitter | Topics | Position | Key points and amendments sought |
|---|---|---|--|
| Aro Valley Community Council Incorporated | <ul style="list-style-type: none"> Housing and development in Aro Valley Intensification and planning rules (height) Heritage and character Community-based planning Urban tree cover and green space Recognition of mana whenua and Māori values | <ul style="list-style-type: none"> The Plan needs to better provide for the protection of Aro Valley's natural and built heritage from inappropriate development and better maintain and enhance amenity values. AVCC supports a nuanced, place-based approach to development. The Plan is currently too broad brush – provisions for qualifying matters and site-specific interpretation need to be used. Requests WCC work with community to ensure integrated, healthy, well-designed communities as density increases. Against market-led approach. Housing aspirations should be centred around those most in need (warm, dry, affordable housing). AVCC welcomes more public housing. AVCC supports “living heritage” which values character and heritage and sees them evolving as communities evolve. Character can be maintained through a | <ul style="list-style-type: none"> Provisions reflecting historical errors and inaccuracies have been carried over into The Plan. Several boundary issues and omissions are specified. Managing sunlight and privacy etc. for existing houses requires granular and integrated planning. Specific examples are offered where proposed zoning for 6 or 8 storeys would significantly impact wellbeing. Retain existing provisions relating to minimum sunlight in the Operative Plan rather than replace them with the minimum daylight provisions of The Plan. The Plan should identify under-utilised sites and locations that are suitable for intensification within existing character areas. Identify sites where development could occur without adverse effects on amenity and character. Retain demolition controls in the Aro Valley pre-1930s character areas (as defined in the Operative Plan) while identifying areas of particular character within these to enable a more granular level of control over demolition and redevelopment. Identify community-based planning for intensification as a method to increase housing supply within areas subject to the revised demolition controls set out above. Provide for this planning to occur prior to significant infrastructure investment. Retain an Aro Valley specific design guide which applies to all new developments within the existing character areas. The Plan should consider coherence – it currently provides for isolated clumps of character. More |

| Submitter | Topics | Position | Key points and amendments sought |
|------------|--|--|--|
| | | <p>community dialogue –heritage vs new housing is a false dichotomy.</p> <ul style="list-style-type: none"> • AVCC supports Anga Whakamua and more recognition of mana whenua values and heritage. • AVCC welcomes more discussion with WCC. | <p>granularity of planning controls could support this coherence (e.g. split within sites).</p> <ul style="list-style-type: none"> • Several examples are given of areas of character that have not been identified in The Plan but should be considered as such. • Amend The Plan to use a comprehensive, holistic definition of character. • Modify height limits, site coverage, height in relation to boundary, setbacks for side and rear boundaries, building location and bulk standards to ensure most developments trigger the need for a resource consent. • Utilise planning tools (i.e. more than just SNAs) to protect and enhance green space – identify and protect existing areas, use design controls which encourage retention of green space. • More specific provisions relating to the protection and increased recognition of Māori heritage within Wellington City, explicit provision for papakāinga projects, and the integration of tikanga Māori into design guides. |
| A. Bramley | <ul style="list-style-type: none"> • Housing and intensification in Mt Victoria • The Plan process | <ul style="list-style-type: none"> • Changes are excessive. The Plan process has been rushed and should be wholly reviewed and slowed down. • Rights of communities have been removed and residents are unaware. • Disagrees with intensification zones on the basis that projected population growth is unrealistic and city is at considerable risk from earthquakes. | <ul style="list-style-type: none"> • Reinstate and extend pre-1930s demolition rules. • Rules for permitting domestic power generation (visible from a public place) should be clarified/reviewed. • Clarify which rules take precedence when houses are in multiple zones. • Extend consultation for a “full interactive consultation”. • More clarity and specificity are needed in the Character Precinct Design Guide and Mount Victoria North Design Guide. • Clarify rules around SNA and trees, responsibility for trimming power lines etc. |

| Submitter | Topics | Position | Key points and amendments sought |
|--|---|---|--|
| Ara Poutama Aotearoa, Department of Corrections. | <ul style="list-style-type: none"> Correction Zone Areas and Prison Designations Community corrections activities given permitted activity status in certain zones. | <ul style="list-style-type: none"> Concerned about SNA and tree rules putting homeowners at risk of significant costs. The format and content of the Corrections Zone chapter is supported overall. The Plan zone chapters, other than the Special Purpose Corrections Zone, do not provide any provisions that reference community corrections activities. Ara Poutama generally supports the provisions relating to residential activities and supported residential care activities within the various zones, with specific changes suggested. Strategic Direction provisions of The Plan are considered overall to be appropriate for supporting residential activities. | <ul style="list-style-type: none"> Specific amendments sought to various definitions, provisions and objectives. |
| Chamber of Commerce | <ul style="list-style-type: none"> Housing and intensification across Wellington Role of business to enable intensification Decarbonising transport Freight and logistics | <ul style="list-style-type: none"> Broadly in support of The Plan, specifically zoning for increased density, and considers the majority of the changes good for business and the economy. Urges further liberalisation of planning laws and reduction in densification limits. Suggests a wider strategy that includes electric vehicles and freight logistics, as well as a vision | <ul style="list-style-type: none"> Supports removal of restrictions around land use regulations and height. Calls for general further reduction of regulations, specifically increasing wind test threshold as per the Property Council submission. Council should consider further how to facilitate growth of services and shops in the city centre. Council should engage with businesses to develop a plan around Wellington's logistics and freight needs. Supports climate target, but calls for more provision for EVs (parking, charging, access to central city) to meet this. |

| Submitter | Topics | Position | Key points and amendments sought |
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| | | for growing business and more planning for ongoing COVID-19 impacts. | |
| Claire Bibby | <ul style="list-style-type: none"> Housing and intensification in Glenside Heritage Environment | <ul style="list-style-type: none"> Proposed changes in Glenside are too permissive and development should be more limited. Proposed changes affecting specific Middleton Road property Road will be detrimental to environment, heritage and amenity. | <ul style="list-style-type: none"> Protect Historic Heritage on specific Middleton Road by listing it on the Plan. Identify and include freshwater springs on specific Middleton Road for protection from earthworks and development. The Special Purpose Urban Residential zone on specific Middleton Road property should be changed to less permissive development. The Ridgelines and Hilltops overlay on specific Middleton Road should be adhered to. Future reserve contributions need to be identified and protected from developer encroachment. Better governance needed for implementation of the Plan (more staff capability and capacity to evaluate and monitor consents). Reduce the height for specific Middleton Road to 8 metres with a design guide specific to this site. |
| Defence Force | <ul style="list-style-type: none"> Provision for temporary military training activities (TMTA) | <ul style="list-style-type: none"> It is important to NZDF that TMTA are specifically provided for in all zones in a district plan, either in a general chapter or on a zone-by-zone basis. NZDF is disappointed that Plan provisions do not reflect previous feedback to WCC to ensure there is a supportive framework for the management of noise effects from TMTA. | <ul style="list-style-type: none"> Noise resulting from discharge of ammunition or explosives is the only unique effect of TMTA that warrants specific management through the Plan. Noise standards included in the Plan should be up-to-date, appropriate for the type of noise generated and reasonably simple to understand, plan for and assess compliance. TMTA provisions should be provided for as a general permitted activity that applies to all zones, rather than on a zone-by-zone basis. Specific amendments and deletions are sought to definitions, policies, rules and standards. |

| Submitter | Topics | Position | Key points and amendments sought |
|----------------------------------|---|--|--|
| Fabric Property Ltd | <ul style="list-style-type: none"> Urban form and development The Centres and Mixed Use Design Guide The City Outcomes Contributions City Centre zone Natural hazards Coastal environment Heritage | <ul style="list-style-type: none"> Fabric generally supports the aims of The Plan, particularly the aims and objectives regarding compact and well-functioning urban intensification and the hierarchy of centres. Seeks removal of or amendments to various provisions which are considered to disincentivise or constrain development. | <ul style="list-style-type: none"> Seeks amendments to remove all direct references to the design guides in the Draft Plan. Seeks that all references to the City Outcomes Contributions provisions be removed from the Plan and design guides. Seeks amendments to CCZ-S1 to provide unlimited building heights in the City Centre zone. Supports the preclusion of public and limited notification in CCZ-R21. Seeks deletion of CCS-S4 and CCZ-S13. Seeks amendments to natural and coastal hazard objectives, provisions, and mapped overlays to communicate the probabilities of the different natural hazard events, and to apply rules that reflect these levels of risk. Amend HH-S1 wording. |
| G. Palmer | <ul style="list-style-type: none"> Medium Density Residential Zone areas and City Centre Zone, specifically in relation to Moir St, Mt Victoria | <ul style="list-style-type: none"> Opposes proposed rules which would allow eight-storey buildings directly behind Moir Street on the grounds that this would damage character, heritage and amenity. The Plan must recognise this sensitive boundary transition to avoid damage to heritage and character. | <ul style="list-style-type: none"> Amendments, sub-clauses and new rules are suggested regarding height and heritage areas. Improvements to stormwater management and control of on-street parking are required prior to any new development. |
| Glenside Progressive Association | <ul style="list-style-type: none"> New development for Upper Stebbings Valley Glenside West Development Area SNAs Historic sites (Glenside) | <ul style="list-style-type: none"> The GPA supports most of the proposals made in The Plan for Upper Stebbings Valley but wants to see major changes to the proposals for West Glenside. Supports the SNAs proposed for Glenside West but have concerns | <ul style="list-style-type: none"> The road connection with Tawa should be reinstated. Glenside West should be reclassified as Large Lot Residential and any Built Area given an Activity Status of Discretionary. Earthworks should be kept to a minimum. The Ridgetop area should be widened to allow for meaningful vertical visual protection. |

| Submitter | Topics | Position | Key points and amendments sought |
|--|---|---|---|
| | | <p>that they will not achieve the protection expected of them by Council.</p> | <ul style="list-style-type: none"> • The Subdivision Design Guide section G13 covering earthworks should be greatly strengthened. • The Residential Design Guide, section on Built Form should be strengthened to include form, colour and light pollution for housing that is visually prominent. • Note in The Plan that Number 246 Middleton Road now has Heritage Historic Reserve status. • Include three historic features in The Plan, namely the railway survey peg, the milkstand and the area of the 1841 gravesite |
| <p>Greater Wellington Regional Council</p> | <ul style="list-style-type: none"> • Integrated freshwater management: Implementing Te Whaitua Te Whanganui-a-Tara Implementation Programme, Te Mahere Wai o Te Kāhui Taiao, Te Awarua o Porirua Whaitua Implementation Programme and Ngāti Toa Rangatira Statement • Taking an integrated approach to freshwater, indigenous biodiversity and natural hazard management, including climate change • Identifying and protecting waterways during structure planning • Providing for urban development with strengthened emphasis on water quality, emissions reduction and sustainable transport. | <ul style="list-style-type: none"> • Greater Wellington Regional Council broadly supports the strategic direction of The Plan, particularly the focus on well-planned intensification rather than greenfields development. GWRC also supports the collaborative approach to sustainable transport networks and the sustainable transport hierarchy. • Te Mana o te Wai needs to be woven throughout the District Plan. • GWRC considers that the District Plan should take a more integrated approach to implementing its overlapping strategic objectives, including biodiversity, freshwater management, and climate change. | <ul style="list-style-type: none"> • Seeks greater consistency and specificity for terms used in relation to Mana Whenua. • Seeks to collaborate to ensure the Proposed District Plan embeds Te Mana o te Wai. • The provisions could more directly mandate the role of green infrastructure and water sensitive urban design in achieving strategic objectives. • Suggests the Sustainability, Resilience and Climate Change strategic direction is used to strengthen and integrate provisions regarding climate change and biodiversity by recognising the value of nature-based solutions and the adverse effects of hard engineering approaches. • Supports provisions regarding SNAs. • Strongly supports the risk-based approach to natural hazards and suggests slope instability be taken into account as a hazard for development. • Recommends extending flood hazard overlays beyond urban area or considering alternative provisions for the General Rural Zone. • Considers that The Plan should have a role in integrated management of adverse effects on wetlands (outside of SNAs). |

| Submitter | Topics | Position | Key points and amendments sought |
|-------------------------------------|---|---|---|
| | | | <ul style="list-style-type: none"> • The Plan should provide for identification and avoidance of waterways (both within and outside of SNAs) during structure planning and subdivision. The current design guides are not considered to provide sufficient certainty of protection. • Recommends a stronger and more integrated approach to emissions reduction, and suggests WCC incorporate specific requirements for emissions reduction assessments for new developments into District Plan provisions, beyond the design guides. • Considers The Plan to lack a clear mandate in its infrastructure and earthworks provisions for avoiding and reducing the adverse effects of earthworks, land use change and urban intensification on water quality. • A comprehensive range of specific amendments and clarifications are sought. |
| Heritage New Zealand Pouhere Taonga | <ul style="list-style-type: none"> • Heritage matters | <ul style="list-style-type: none"> • Generally supports the Plan with regard to heritage matters and commends the wide range included (Māori heritage, archaeology, built heritage). • Provisions for the protection of heritage are generally supported. | <ul style="list-style-type: none"> • Specific amendments are sought on various provisions and definitions. |
| Investore Property Ltd | <ul style="list-style-type: none"> • Urban form and development • Design Guide • City Outcomes Contributions • Height standards • Frontage controls • Changes in activity status • Hazards and coastal environment | <ul style="list-style-type: none"> • Investore supports Stride's feedback regarding Johnsonville and surrounding areas. • Investore generally supports the aims of The Plan. • Suggests changes to ensure development is not disincentivised or constrained. | <ul style="list-style-type: none"> • Design guides should be guidance documents that sit outside the Plan – amendments are sought to remove all direct references to the design guides in the Plan, with provisions instead referring to design outcomes. • Investore is opposed to the City Outcomes Contributions provisions, specifically for 'over height' development (viewed as a potential disincentive for development at odds with strategic objectives). Some are also considered ultra vires the Council's functions. Seeks that all |

| Submitter | Topics | Position | Key points and amendments sought |
|------------------------------------|---|--|--|
| | | | <p>references to the City Outcomes Contributions be removed from the Plan and Design Guides.</p> <ul style="list-style-type: none"> • Increase maximum height standards in Johnsonville Metropolitan Centre. • Various amendments and deletions to policies, objectives and rules. • Clarify the full implications for sites identified as Sites of Significance to Māori. • Shift Korokoro - Takapū Ara line on Tawa site. |
| Johnsonville Community Association | <ul style="list-style-type: none"> • Johnsonville zoning and intensification • Height limits • SNAs • City Outcomes Contributions • Rapid transit service criteria | <ul style="list-style-type: none"> • The JCA supports WCC's long-term objectives to provide more affordable housing, but raises issues with the overall approach as well as a number of specific points in relation to proposed changes for Johnsonville. | <ul style="list-style-type: none"> • Rezone more rural land as Outer Residential. • Supports change to permit three dwellings of up to three storeys in residential areas. • Remove SNA provisions as applied to private property. • Requests more clarity of criteria for non-notification of non-compliant housing developments. • Requests an independent review of the MDRAs to determine whether "Density Done Well" developments have been permitted. • Opposes City Outcomes Contributions. • Recommends a compensation framework for residents who lose amenity and value due to high-density developments. • Update, clarify, and provide evidence for criteria regarding rapid transit services and stops. Engage with community groups prior to finalising the Plan regarding this criteria. • Requests deletion of rule LCZ-R11. • Strongly opposes any development higher than the 8 storey limit. • Opposes the statement that residential development is to be a key focus of Metropolitan Centre and requests that such statement in the DDP be reduced to "Residential Developments can also be supported as long as they do not compromise the core purpose of the centre". |

| Submitter | Topics | Position | Key points and amendments sought |
|-----------------|---|---|---|
| | | | <ul style="list-style-type: none"> • Various changes sought regarding area of the Johnsonville MRZ. • Requests Woodland Road/Prospect Terrace be added to the DDP as a registered Ridgeline. • Requests the WCC fund and complete the planned roading improvements for the Johnsonville Triangle. • Requests the Green Space Review be completed as soon as possible, and that development of the Old Library Site be postponed until the Review is complete. • Requests the WCC outline specific planned investments in each of the above areas that require further investment in facilities and infrastructure. |
| Kainga Ora | <ul style="list-style-type: none"> • Housing and intensification • Natural hazards • High Density Residential Zone Provisions | <ul style="list-style-type: none"> • The Plan should be incentivising development across the whole city. Suggests changes to ensure housing development is incentivised rather than constrained. | <ul style="list-style-type: none"> • Comprehensive range of amendments and deletions sought. |
| KiwiRail | <ul style="list-style-type: none"> • Infrastructure (Coastal environment and Ecosystems and indigenous biodiversity) Subdivisions • Earthworks • Noise • Transport • Zoning • Designations | <ul style="list-style-type: none"> • KiwiRail encourages land uses near the railway corridor that do not compromise the short or long-term ability to operate a safe and efficient rail network, both day and night. | <ul style="list-style-type: none"> • Specific amendments sought. |
| Live Wellington | <ul style="list-style-type: none"> • Housing and intensification across Wellington City. <ul style="list-style-type: none"> - Sequencing intensification - Community-based planning - Lead by engaging (partnerships and actors) | <ul style="list-style-type: none"> • Concerned about community wellbeing and contends that The Plan takes too much of a “one-size fits all” approach that does not take into account unique | <ul style="list-style-type: none"> • Objectives should recognise the value of community planning and participation and recognise how character and design contribute to wellbeing. • Redo Housing and Business Capacity Assessment based on potential speed of development on underused land (if WCC actively leads on this). |

| Submitter | Topics | Position | Key points and amendments sought |
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| | | <p>contexts and will encourage haphazard intensification.</p> <ul style="list-style-type: none"> Provisions should be more rigorously tested to ensure they support stated objectives (e.g. intensification and climate change). Recommends a more granular, sequenced approach that integrates community participation and supports amenity values. | <ul style="list-style-type: none"> Sequence intensification to prioritise underdeveloped land close to public transport alongside targeted infrastructure investment, with community consultation. Broader interpretation of qualifying matters under NPS-UD is needed to allow sequencing. Identify communities to involve in planning and recognise community planning as a method for intensification. Make greater provision for limited notification and categorise more development activities as controlled to ensure quality design. Identify development partnerships and key actors to increase development on underutilised land and areas suitable for intensification. Provide for amenity through the design guide, height limits and setbacks; modify location and bulk standards so resource consents are necessary; develop block level masterplans to integrate new density; retain sunlight provisions of Operative Plan; update design guides as they relate to character areas; and develop place-based guides with community. Protect heritage through updating character definition, and targeting intensification rather than broadly upzoning and removing demolition controls. Supports protection and recognition of Māori heritage. |
| Ministry of Education | <p>As they relate to Educational Facilities:</p> <ul style="list-style-type: none"> Designations Coastal Hazard Overlays Definitions | <ul style="list-style-type: none"> The Ministry seeks that various amendments, additions or retentions are accepted and adopted into the proposed District Plan. | <ul style="list-style-type: none"> Seeks a new policy and rule which will provide for Educational Facilities as a Discretionary activity in Large Lot Residential Zones. Seeks that that the General Rural Zone includes provisions for non-rural and residential buildings and structures as Discretionary activities. Various amendments to wording, definitions and rules are sought. |

| Submitter | Topics | Position | Key points and amendments sought |
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| New Zealand Motor Caravan Association | <ul style="list-style-type: none"> Camping Definitions of buildings | <ul style="list-style-type: none"> NZMCA wants provision for people to camp responsibly across the City and travel in non-motorised caravans. | <ul style="list-style-type: none"> Amend The Plan to either (a) explicitly exclude freedom camping from the need to comply with the District Plan or (b) make freedom camping a permitted activity. Amend the definition of building as recommended to exclude non-motorised caravans. Suggest The Plan includes a set of criteria which define why and how an un-named activity may be sensitive. Recommend creating a subcategory that excludes campgrounds (under definition of Visitors' Accommodation) from sensitive and hazard-sensitive activities. |
| Oranga Tamariki | <ul style="list-style-type: none"> The definitions and nesting of 'Residential activity' and 'Supported Residential Care' Proposed objectives for Strategic Direction and Urban Form and Development Proposed objectives for the Residential Zones and activity status for Residential Activities | <ul style="list-style-type: none"> Oranga Tamariki is generally supportive. While further refinement of the DWDP is recommended, Oranga Tamariki considers the DWDP to be an enabling plan in relation to providing for a range of housing. | <ul style="list-style-type: none"> Specific comments and suggested changes to wording and provisions. |
| Patricia Briscoe | <ul style="list-style-type: none"> Heritage, character and amenity protection in Mount Victoria. | <ul style="list-style-type: none"> Wants greater heritage protections and to reinstate the pre-1930s demolition rule in certain areas. Suggests zoning and provision changes to ensure appropriate development. Unhappy with timing of consultation. | <ul style="list-style-type: none"> At minimum, the areas recommended by Heritage NZ to be added to the Spatial Plan should be designated character areas. The edge of Kent Terrace should be zoned Mount Victoria Medium Density Residential Zone. Supports Mt Victoria Planning Group Outline for addressing housing demand while preserving character. Definition of character must include heritage. Include Tutchen Avenue in the Porritt Avenue character area. |

| Submitter | Topics | Position | Key points and amendments sought |
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| | | | <ul style="list-style-type: none"> • Mt Victoria North Townscape Precinct should be part of Existing Character Precinct. • Specific design guides should be reinstated for Mt Victoria's seven character sub-areas. • Strongly opposes changing provisions regarding sunlight (min. 2 hours) in the Medium Density Zone. Current provisions should remain. • Opposes granting of height exemptions for provision of "assisted housing" due to concerns this right will be abused. |
| Penelope Borland | <ul style="list-style-type: none"> • Housing and intensification • Heritage • Mt Victoria | <ul style="list-style-type: none"> • Contends the Plan's "blanket upzoning" will encourage haphazard intensification that will not meet housing needs – a more granular approach is required. • Supports the approach of Live Wellington and calls for sequencing of intensification and prioritising underutilised land. • Wants more consideration of specific context to ensure sunlight and amenity remain in existing dwellings. • Community planning and involvement should be increased. | <ul style="list-style-type: none"> • Set out a clear sequence for intensification (underutilised land) and use zoning and qualifying matters to achieve this. • Align sequencing with infrastructure investment. • Broader use of qualifying matters in the NPS-UD is needed. • Identify sites within character areas where intensification could occur without adverse effects – use community-based planning. • Rezone specific streets in/near Mount Victoria to decrease height limits. • Reinstate the pre-1930s demolition rule to areas recommended by Heritage NZ in Draft Spatial Plan. • Planning rules must be localised to account for topography – decrease height limits on Mt Victoria. • Amend definition of character. • Greater provision for limited notification and design guides to protect amenity. • Height exemptions for the provision of "assisted housing" should not proceed. |
| Rainbow Group | <ul style="list-style-type: none"> • Housing and intensification • Public space and amenities | <ul style="list-style-type: none"> • Concerned about disproportionate effects of | <ul style="list-style-type: none"> • Encourages the council to explore processes and legal protections to protect LGBTQI+ and other communities who face housing discrimination. |

| Submitter | Topics | Position | Key points and amendments sought |
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| | | <p>housing crisis on LGBTQI+ community.</p> <ul style="list-style-type: none"> • Supports increased density around amenities and greater investment in mixed modes (e.g. co-housing, solo housing, social housing) to support social cohesion. • Public and green spaces could be safer and more inclusive for LGBTQI+ and other communities. | <ul style="list-style-type: none"> • Endorses the proposals in the Residential Strategic Direction as well as recommending greater provisions for co-housing. • Supports Option 4 for Assisted Housing. • Supports CPTED and inclusive design principles for public spaces. • Calls for rainbow culture to be more visible and for creation of queer spaces and hubs. |
| Sean Broadly | <ul style="list-style-type: none"> • Housing and intensification in Newtown | <ul style="list-style-type: none"> • Supports zoning changes and suggests further increasing intensification in Newtown. | <ul style="list-style-type: none"> • Support the new height limits and the removal of the “historic precinct” rules for pre-1930s buildings in most of Newtown. • Some of the mixed usezone (MUZ) buildings in Arney Street, Donald Maclean Street and Ferguson St in Newtown are zoned max. 12m, but are suitable for tall mixed use buildings with residential upper stories so max. height should be amended to 22 metres. |
| Southern Cross Submission | <ul style="list-style-type: none"> • Zoning of Southern Cross Hospital in Newtown | <ul style="list-style-type: none"> • Seeks that the Plan recognise Hanson Street Hospital as essential social infrastructure for the Wellington Region with specific operational needs by rezoning the Site Special Purpose Hospital Zone (Hospital zone). | <ul style="list-style-type: none"> • Supports the 21m height limit applied to the Site. • Seeks that the Site be rezoned Hospital zone. • Supports the approach in Strategic Objective SCA-O3 of providing for additional infrastructure but seeks amendments to ensure that this objective applies to hospitals. |
| Stratum Management | <ul style="list-style-type: none"> • Setbacks and structure heights | <ul style="list-style-type: none"> • Contends that requirements regarding the design of apartment buildings will add inefficiency and cost. | <ul style="list-style-type: none"> • Section CCZ-S4 (<i>Street Edge Height</i>) will add significant cost to design of multistorey buildings in Wellington. • Section CCZ-S5 (<i>Minimum Building Height</i>) will force developers to build inset upper floors that will be inefficient both in terms of spatial use and structural form. |
| Stride Investment | <ul style="list-style-type: none"> • Housing and intensification | <ul style="list-style-type: none"> • Supports Investore submission. | <ul style="list-style-type: none"> • Supports Metropolitan Centre zoning and enabling greater height in Johnsonville Centre, and supports six- |

| Submitter | Topics | Position | Key points and amendments sought |
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| Management Ltd | <ul style="list-style-type: none"> Johnsonville centre zoning and building heights. | <ul style="list-style-type: none"> Stride generally supports the aims of the Plan but seeks specific amendments to avoid disincentivising development. | <p>storey residential development within the ten-minute walking catchment.</p> <ul style="list-style-type: none"> Increase maximum height standard in Johnsonville Centre. Supports intent of design guide but contends it should sit outside The Plan as a reference rather than standards. Opposed to the 'City Outcomes Contributions' provisions, specifically regarding 'over height' development. Opposed to all Assisted Housing options proposed except Option 1. Seeks deletion of the Assisted Housing Chapter and deletion of all references to Assisted Housing. Seeks various amendments and deletions to rules and policies. |
| Summerset | <ul style="list-style-type: none"> Retirement Villages | <ul style="list-style-type: none"> Supports the submission of the Retirement Villages Association of New Zealand in its entirety and raises various other matters pertaining to retirement villages. | <ul style="list-style-type: none"> Summerset supports the RVA's opposition to the current form of a number of provisions, including Rules MRZ-R7, GRZ-R7, MRZ-R14 and GRZ-R14, Policies MRZ-P5 and GRZ-P5, and Standards MRZ-S11, MRZ-S13, MRZ-S14 and MRZ-S15. Seeks various amendments to other rules and standards. |
| Transpower | <ul style="list-style-type: none"> Energy infrastructure | <ul style="list-style-type: none"> Transpower considers that further amendments to the draft District Plan are required in order to give effect to the NPSET and be consistent with the intent and effect of the NESETA. | <ul style="list-style-type: none"> Lack of provision of definitions for the National Grid, National Grid Yard and National Grid Subdivision Corridor. Generally supports the Strategic Objectives but seeks amendment to the explanatory text and provision of a new SO specific to the National Grid. Queries the number of Infrastructure sub chapters, policies and rules relating to Infrastructure. The general Infrastructure rules are largely supported, subject to some refinements. There are no National Grid specific policies in the plan that specifically recognise the benefits of the National Grid or manage the effects of other activities on the National Grid. |

| Submitter | Topics | Position | Key points and amendments sought |
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| | | | <ul style="list-style-type: none"> • Seeks a separate policy framework for the National Grid which recognises and provides for the benefits of the National Grid, manages the effects of the National Grid, and manages the effects of other activities on the National Grid. • Specific to the Infrastructure - Coastal Environment chapter, the proposed National Grid policies do not give effect to the NPSET. • Specific to Infrastructure - Ecosystems and Indigenous Biodiversity, the proposed National Grid policies do not give effect to the NPSET. • Specific to Infrastructure - Natural Features and Landscapes, the proposed National Grid policies do not give effect to the NPSET. • Opposes a non-complying activity status for new National Grid assets within any natural hazard areas. • A comprehensive suite of amendments is sought. These are provided as a draft only as Transpower anticipates these will be refined through the City Plan development process. |
| Waka Kotahi | <ul style="list-style-type: none"> • Transport and infrastructure • Noise and reverse sensitivity | <ul style="list-style-type: none"> • Appreciates WCC's early engagement on provisions and inclusion of Waka Kotahi suggestions. • Concerned with ensuring that Waka Kotahi's roading assets are adequately provided for, that the approach to transport issues aligns with the Waka Kotahi strategic direction, and that Waka Kotahi can promote best practice transport solutions across the country. | <ul style="list-style-type: none"> • Seeks amendments regarding wording, definitions, policies, strategic directions, provisions and planning maps. • More prominent placement of provisions regarding noise and reverse sensitivity, suggests provisions regarding noise and reverse sensitivity have immediate legal effect under notification. |

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| Wellington Electricity Lines Ltd | <ul style="list-style-type: none"> • Definitions • Infrastructure • Subdivision | <ul style="list-style-type: none"> • The coverage of matters pertaining to WELL's infrastructure operation and development in the Plan must be at an appropriate level and such coverage must be enabling for security of supply of the District's electricity supply network. • Acknowledges WCC has adopted feedback from previous consultations. • The overall content of the DDP infrastructure provisions is well considered and largely reflect the appropriate context for the safe and secure supply of the District's electricity distribution network. | <ul style="list-style-type: none"> • Specific comments are provided in relation to the proposed objectives, policies, rules and performance standards to address various concerns. • If the specific relief (proposed wording amendments) is not accepted by Council, WELL requests that appropriate alternative amendments be made to give effect to the matter raised. |
| Wellington International Airport | <ul style="list-style-type: none"> • Airports | <ul style="list-style-type: none"> • Concerned that various provisions or definitions may limit necessary airport activities. • Appropriate controls need to be in place to ensure urban development does not have consequences for effective, efficient and safe operation of airport or adverse effects (e.g. noise) on residential activities. | <ul style="list-style-type: none"> • Include a stand-alone definition of Airport purposes. • Disagrees with classification of site within coastal environment. • SCA objectives need to go further to directly recognise and provide for nationally/regionally significant infrastructure. • Clarify that general infrastructure provisions do not apply to the Airport Zone. • Provisions within infrastructure chapters should be reviewed and streamlined. • Provisions relating to be renewable energy should be more enabling. • Clarification requested regarding road classification. • Airport activities/emergency activities should be explicitly excluded from Natural Hazard Zone provisions. |

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| | | | <ul style="list-style-type: none"> • Clarification requested as to how provisions for Sites of Significance to Māori will be applied. • The Plan must recognise and enable activities to be considered within a proposed significant natural area or outstanding natural feature where that is justified. • There should be a clear consenting pathway for subdivision activities associated with airport infrastructure. • Subdivision chapter should include clear recognition of the ANB. • Assisted housing options must not inadvertently lead to residential housing in proximity to the airport. • Duplication in Coastal Environment chapter should be reviewed. Rules must not restrict necessary activities. |
| Woolworths | <ul style="list-style-type: none"> • Centres approach • Supermarkets (activity status and zones) • Carparking and signage | <ul style="list-style-type: none"> • Recommends a “centres plus” approach that is more flexible and adaptive and that enables business activity outside centre zones. • Supermarkets are not explicitly enabled in any zone, which is at odds with the enabling framework of The Plan and the NPS-UD. | <ul style="list-style-type: none"> • Recommends activity status for supermarkets in particular zones. • Greater clarity on definitions. • Amendments are required for carparking and signage provisions to ensure operational needs of supermarkets are adequately provided for. |
| Youth Council | <ul style="list-style-type: none"> • Heritage and Culture • Sites and Areas of Significance to Māori • Tangata Whenua • Sustainability, Natural Environment, Resiliency • Transport • Design Guides • Character Housing | <ul style="list-style-type: none"> • Youth Council broadly supports most aspects of the Plan, and the goal of a vibrant and intensified city. • Youth Council urges specific consideration of issues young people face. | <ul style="list-style-type: none"> • Supports engagement with mana whenua on matters pertaining to cultural/historical sites through a clear and accessible consultation process. • Mana whenua should have the ability to change categorisation of Sites and Areas of significance within consultation. Sites should be named with their cultural name. • Supports further active engagement with tangata whenua. |

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| | <ul style="list-style-type: none"> • Centres and Business • Assisted Housing • Residential Housing • Greenfield Development | | <ul style="list-style-type: none"> • Supports sustainability chapter, specifically rules protecting landscape and significant natural areas. • Supports shift towards public and active transport and making this more accessible and equitable (e.g. use of braille, use of Te Reo). • Supports design guide and would like to see more low-emissions design and construction. • Supports character housing section and enabling alteration of heritage buildings. Favours slowly moving away from character housing precincts to increase affordability but acknowledges different values regarding character. • Supports enabling residential development and growth for business and services in centre. • Supports the City Outcomes contributions. • Supports Assisted Housing section and supports Option 1 (with concern around WCC having less control over design); Option 2; and Option 3. Concerned that Option 4 will result in overall lower housing supply. • Supports increasing urban density, particularly close to the CBD, and urges development in transport infrastructure and services in these areas to prevent an upsurge in private car use. • Urges long-term policy to move away from greenfields development and urban sprawl. • Urges provision of active/public transport infrastructure and services to cater for new developments. |

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