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Part A Introduction

1. Purpose of report

Section 32 of the Resource Management Act (RMA) stipulates a requirement to consider alternatives and assess the benefits and costs of adopting any objective, policy, rule, or method in the District Plan. Before publicly notifying a Proposed District Plan Change, the Council is required to prepare a Section 32 Report summarising these considerations.

The purpose of this report is to summarise the evaluation of proposed objectives, policies and methods of Proposed District Plan Change 73 arising out of the review of the Suburban Centres zone and chapters of the Operative District Plan.

Section 32 of the Act requires:

(3) (a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act,

An evaluation of policies, rules and other methods that examines:

(3) (b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

In terms of examining policies, rules and other methods, an evaluation must take into account:

(4) (a) the benefits and costs of policies, rules, or other methods; and

(b) the risks of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rule, or other methods

Benefits and costs are defined as including benefits and costs of any kind, whether monetary or non-monetary.

The s32 report, summarising the evaluation and giving reasons for the evaluation, must be available for public inspection at the time a proposed change is publicly notified. This report is considered to meet the requirements of s32.

2. Wellington City District Plan

2.1 District Plan background – 1994 to 2000

The now operative District Plan replaced the 1986 District Scheme, which was written under the Town and Country Planning Act. Legislative change meant a re-think of how planning was approached, and four main approaches to land use control and zoning were considered:

1. a liberalised, flexible zoning regime;
2. continuation of the District Scheme approach of that time, involving detailed separation of land use activities;
3. no zoning; and
4. performance-based zoning using performance standards.

The Council determined a mix of options 2 and 4 was appropriate. This combination meant a more ‘market-led’ approach on planning issues. It was considered at the time that the market would appropriately decide the best location for different types of activities, particularly economic activities, and the District Plan needed only to

control the adverse effects of activities. Activities were therefore generally permitted, but subject to meeting performance standards to control effects. This planning approach was a significant paradigm shift from the controlled approach of the 1986 District Scheme, which separated out activities and provided individual zones for them.

The subsequent District Plan has five generic zones, the inner and outer residential areas, the central area, the rural area, the open space areas and the suburban centres; and two precincts, airport and golf course recreation precinct, and the institutional precincts (Vitoria and Massey Universities, and Wellington Hospital).

This review is concerned with the Suburban Centres zone. The zone contains commercial, business and industrial areas and traditional retail and neighborhood centres that are physically spread across the city in 44 different locations. Each area or centre has its own character and role that it plays in the city's day-to-day functioning of the City.

In addition, non-residential activities in the Residential zone were also considered in this review to ensure they are appropriate to that zone, and not the Suburban Centre zone. Of particular interest are several small groups of shops, located throughout the city, that were previously zoned for retail purposes under the District Scheme, but which were re-zoned to Residential under the District Plan. These premises currently have to rely on existing use rights under section 10 of the Act to continue trading, with any change of use requiring determination for existing use rights or grant of resource consent.

2.2 District Plan 'rolling review' programme

Pursuant to Section 79 of the Act, Council is required to commence a formal review of its operative district plan at least every ten years. Council has chosen to undertake a 'rolling review' of the District Plan in advance of its 10-year anniversary in 2010. This program involves a chapter-by-chapter review of the Plan so that when the statutory 10-year review begins, the Plan is less likely to be in need of a full review. To date, the Central Area zone and chapters have been reviewed and a resultant plan change publicly notified on 18 October 2007.

This Suburban Centre zone review is the second of the rolling reviews. The review began in mid-2007 and culminates with this Proposed Plan Change.

2.3 District Plan provisions under review

The Wellington City District Plan (the District Plan), has been operative since 2000 – with the exception of appeals on the Lambton Harbour Area that were later resolved in 2004.

District Plan provisions specifically relating to the Suburban Centres zone review are:

- Volume 1:
 - Chapter 6 contains the objectives and policies for the Suburban Centres
 - Chapter 7 contains the rules and standards for the Suburban Centres
 - Appendices in Chapter 7 (noise standards, Shelly Bay suburban centre boundary line etc)
- Volume 2:
 - Newtown Suburban Centre Character Area Design Guide
 - Shelly Bay Suburban Centre Character Area Design Guide
- Volume 3:
 - Zoning maps
 - Hierarchy of Roads - map 33
 - Street frontage (veranda and window) – maps 43-49
 - Hazard (Fault Line) Area maps - 50-54

Since the District Plan was made operative in 2000, there have been eight Proposed District Plan Changes affecting the Suburban Centres zone:

- **District Plan Change 40** – Newtown Character Area boundary change
- **District Plan Change 45** – Rezoning of land in the northern part of the city from Rural to an Urban Development Area with Structure Plans guide development. There is a mix of residential and suburban centre zones with site specific planning controls
- **District Plan Change 47** – Rezoning of land at Takapu Island from Outer Residential to Suburban Centre, with site specific planning controls
- **District Plan Change 52** – Rule amendments affecting both retail activities over 500m² in floor area and buildings over 500m² in floor area, introducing a requirement for resource consent in both instances
- **District Plan Change 53** – various buildings recognised for their individual heritage value
- **District Plan Change 58** – introducing a Heritage Area to the row of shops on the eastern side of The Parade
- **District Plan Change 60** – Rezoning of land in Churton Park from Outer Residential to Suburban Centre, with site-specific planning controls, in order to provide for local retail needs
- **District Plan Change 66** – Rule amendments affecting retail activities between 10,000m² and 20,000m² in floor area

Of these, District Plan Changes 40, 47, 52 and 66 are relevant to this review. The other plan changes will not be reviewed or altered during this process.

3. Outline of Suburban Centres Review

3.1 What are Suburban Centres?

Because of the broad zoning approach in the District Plan, Wellington's suburban centres encompass a wide range of activities and functions. Importantly all the different suburban centre areas contribute to the city's economy. Broadly the suburban centres function as either shopping or town centres; industrial areas; or mixed-use areas where industry, retail, residential and business activities co-exist.

Local shopping centres are important for the economic and social life of their communities, providing accessible shopping and local services to meet people's day-to-day needs. These places serve local populations and are visited daily or several times per week by those who live nearby. They are important not only for being able to access retailers and services, but people also use their local centre as a place for social interaction. Where possible, Council has invested in community services within these centres such as libraries, community halls, crèches etc. Whilst community services are important, it is the retail component upon which a centre's success ultimately relies. Because of the importance of retail in the vitality of a centre, competing retail uses in out-of-centre locations can (but may not always) have a direct bearing on the viability and vitality of a centre by attracting people out of the centre and into a different location.

There are a number of other factors that influence centres including access from public transport, infrastructure (roads, water, storm water etc), buildings and signage, public spaces, heritage, streetscape and natural aspects, such as streams or the coastline.

Industrial activities also play an important role. Examples of industrial or traditional work areas include the meat works and quarry at Ngauranga Gorge, and warehouses and commercial distribution businesses at Grenada North. These are places where

industry has tended to co-locate, creating an industrial resource which is an essential function of the City. The character of these areas is generally utilitarian and can be incompatible with sensitive land uses such as residential activities.

Mixed use areas are also present in the Suburban Centre zone. An example is Kaiwharawhara on the edge of the Central Area zone. Traditionally this area was more industrial in character as is evident in the form and shape of many of the older buildings, but nowadays the area accommodates a range of activities, including residential activities.

Altogether the centres, industrial and mixed-use areas make up the Suburban Centres zone of the District Plan, at 44 locations throughout the city.

3.2 Aim of the Suburban Centres review

The aim of the Suburban Centres review is to consider whether or not the structure, policy direction (objectives and policies) and methods of implementation for the Suburban Centres zone are currently effective in delivering an urban environment that meets community expectations, and is sustainable and in line with Council's strategic resource management outcomes and frameworks. The review considers existing issues, clarifies and defines them and initiates a plan change that aims to result in a positive environmental outcome for Suburban Centres zoned land, and for the city as a whole.

3.3 Review outcomes

The outcomes sought in the review are:

- to address the main gaps and flaws in the existing zone and chapters, taking practical steps to fill gaps, remove redundancies and generally streamline provisions to ensure the Plan can be implemented efficiently;
- to further investigate and clarify current resource management issues;
- to set the path for achieving Council's strategic direction outlined in the Urban Development Strategy 2006 and the Centres Policy 2008;
- to give effect to relevant regional and national directions that have emerged since the Operative Plan was drafted; and
- to provide better targeted and researched Plan provisions that relate to the wide range of suburban centre environments, and today's social and economic needs.

3.4 Review principles

The principles guiding the review are:

- to be consistent with the rest of the District Plan, particularly the reviewed Central Area zone and chapters;
- to ensure as far as practicable the zone provisions are workable and easily understood;
- to be consistent with the commitment to good urban design as a signatory to the Urban Design Protocol;
- to keep the zoning provisions current and adaptable to changing pressures in land use;
- to have an appropriate level of control (or other methods), avoiding regulation for the sake of it and facilitating development where appropriate;
- to achieve a quality environment where people are able to live, work and play; and
- to involve stakeholders from the community, development sector, Council officers and Councillors in the review and any resultant proposed plan change.

Part B Identifying the issues

4. Review Context and Issues

Both the Greater Wellington Regional Council and Wellington City Council's strategic planning policies are considered to be based on sound resource management practice in line with the purpose of the Act. These strategies have therefore provided the resource management framework for the Suburban Centres zone review and this plan change.

4.1 District Plan Change 52

In advance of the 'rolling-review' of the Suburban Centres zone, several resource management issues were identified through officer use and monitoring of the District Plan and also through independent studies, such as the 2003 report by Hames Sharley, *Spatial Analysis of Retailing in Wellington*.

The first issue that arose from this research was evidence that higher order land uses such as retail and residential activities, were beginning to establish in more work-based land outside of the more traditional shopping locations in and around existing centres. As a result, it was identified that it has become increasingly difficult for business and commercial activities to locate in work-based locations because of rising land prices and other issues such as effects of reverse sensitivity.

A second notable trend has been the fragmentation of the retail sector which has begun to adversely impact on the social and economic performance of some traditional town centres.

Thirdly, the lack of urban design consideration in built development was leading to a poor quality urban environment.

These issues were addressed in District Plan Change 52, publicly notified on 18 October 2007.

The controls in District Plan Change 52 seek to maintain the retail primacy of the six main shopping centres of Tawa, Johnsonville, Karori, Newtown, Kilbirnie, and Miramar; to manage large retail developments outside of these areas; and to manage the external appearance of new large developments. This approach is a significant departure from the operative rules applying to activities in the Suburban Centres zone of the District Plan, wherein there are only a few controls on what activities are permitted. This more relaxed approach does not take into account the impact of out-of-centre retailing on established local retailing centres; the loss of commercially zoned land to residential activities; or the impacts on urban form or sustainable transport options.

District Plan Change 52 introduced two new overarching goals:

1. To address urban design issues. All new buildings over 500m² in floor area require a resource consent; and
2. To address retail issues. All new retail activities over 500m² in floor area and located outside one of the identified main retail centres, require a resource consent.

This review will re-consider this response and decide if it is still appropriate and necessary, or whether a more refined approach would give better environmental results.

4.2 District Plan Change 66

The current flexible market-led planning approach in the District Plan allows the economy to respond to changing market conditions, but it does mean that the potential for large retail developments can be developed without the need to consider their wider impacts. In the Operative Plan, there is no ability to consider the potential impacts of such developments on the Golden Mile (the city's premier retail strip and a key economic component of the retail sector in Wellington), or consider the economic wellbeing of the Central Area or Suburban Centres, or to fully consider the travel and transport impacts of such a proposal. District Plan Change 52 did not address all these issues, and in particular it did not consider impacts on the Golden Mile.

A large retail development (eg. one between 10,000 and 20,000m² in floor area) in an out-of-centre location could have a significant impact on the urban form of a centre and the patterns of travel to and from it. This is due to the economic dominance that large retail developments have. Their role becomes one of an 'anchor' for additional specialist retail and other uses and activities. People are attracted to large retail developments for the many things they have on offer, and so the number of transport trips generated by these developments can become problematic when key roading networks and transport systems are not aligned with their location. Furthermore, the economic dominance that large retail developments have means they have the potential to undermine the viability of established Centres.

District Plan Change 66 and Variation 5 are proposed as a means to allow Council to more effectively manage the potential adverse effects of large retail developments on both the Golden Mile, and more particularly for this review, on some of the Suburban Centre zoned Centres. The proposed changes include limiting the size and location of large format retailing to particular locations of Johnsonville, Newtown or Kilbirnie.

This review will re-consider this response and decide if it is still appropriate and necessary or whether a more refined approach would give better environmental results.

4.3 District-level strategic policy framework

The Council has a number of strategy and policy documents that collectively set out a vision for the city and how to deal with anticipated population and development growth. Recent regional and national policy guidance have influenced and reinforced the Council's strategic planning direction.

These strategy and policy documents collectively identify several resource management issues for the city as a whole, with many issues being pertinent to the Suburban Centres zone. At present, the policy direction of the Suburban Centres zone does not lend itself to supporting the strategic planning direction for the city because of its market-led approach to providing for land use activities. The frameworks discussed below therefore raise several resource management issues that this review has looked at in order to determine what amendments to the District Plan are necessary to address them.

4.3.1 The Long Term Council Community Plan

At the time of writing the Council was finalising and adopting the Long Term Council Community Plan for the 2006/07-2015/16 period. The Long Term Plan identifies a vision for the city:

... to achieve global competitive advantage by positioning our city as Creative Wellington – Innovation Capital (p. 39)

Of particular relevance to the District Plan are the long term outcomes for urban development, transport, and the environment. The long term outcomes as outlined in the draft Long Term Plan remain largely unchanged in the final document.

4.3.2 The Urban Development Strategy 2006

In July 2006 Council adopted The Urban Development Strategy (UDS), a strategy to guide development of the city and cater for anticipated population growth. This strategy is a significant piece of strategic planning which is in line with regional level strategic policy directions for guiding and providing for growth in Wellington.

The UDS is comprised of seven strategies relating to transport, environment, urban development, economic development, social, recreation and cultural well-being and governance contribute to this strategy. The UDS focuses on preserving Wellington's compact urban form and encouraging transit orientated growth. One of the most important concepts in achieving this is by implementing the 'growth spine', which aims to concentrate development along a central spine from Johnsonville to the Wellington Airport. As part of this concept, Suburban Centre zoned areas of Johnsonville, Adelaide Road and Kilbirnie are anticipated to develop with much higher residential densities and the necessary social and economic activities to support those populations.

The current Suburban Centre zone provisions are not geared towards providing for growth in this way or preserving Wellington's compact urban form, rather any activity can locate anywhere in this zone. Furthermore, there are few considerations given to transport issues and how these relate to land use activities, nor are there any urban design provisions to ensure a good quality public environment. Whilst District Plan Changes 52 and 66 have sought to assist with urban design and transport issues, their effectiveness in dealing with all interrelated effects and providing a basis in the District Plan for the UDS is considered limited due to the overarching market-led approach this zone currently has.

Whilst the current District Plan approach does not limit growth per se, in light of the UDS it does not provide for sustainable management of land in the Suburban Centre zone either. The UDS is reasonably specific on what the city needs to provide for anticipated population growth and where Council is able to economically service that growth through infrastructure. Development therefore needs to align itself with infrastructure investment if the city is to grow sustainably.

Growth also needs to be aligned with the Council's policy for residential growth and infill housing. In particular, in October 2008 the Council endorsed the policy of intensifying employment and housing in and around the Johnsonville town centre, the Central Area, Adelaide Road and Kilbirnie town centre, all of which are important locations on the 'growth spine' identified in the UDS. The current Suburban Centres zone provisions would make it difficult to put these policy directions of the Council into practice because they allow development to occur anywhere rather than directing it to these specific locations.

4.3.3 Adelaide Road Framework

The Adelaide Road Framework outlines a vision for the future growth and development of the Adelaide Road area and identifies things Council would like to achieve. It envisages significant urban change over the next 20+ years to create a prosperous and high quality mixed-use area. The vision provides for significantly more residential development (to accommodate approximately 1550 more people by 2026), supported by good quality public amenities and streetscape, employment opportunities, good public transport, and a transport route that works well for everyone. Most of the area within the Adelaide Road Framework is zoned Suburban Centre. However, the current Suburban Centre zone provisions would not facilitate this framework and need to be altered if it is to be successful.

4.3.4 Centres Policy 2008

In light of the UDS and emerging issues around retail activities, Council has replaced its 2003 Retail Strategy with a new 'Centres Policy', adopted in August 2008. This Policy is designed to be supported and implemented through more detailed policies (including the District Plan and centres plans), and infrastructure investment decisions of Council.

This Policy provides a framework to guide the development and management of the city's commercial, retail and business areas. It is in line with supporting centres identified for future growth in the UDS, and importantly considers Council's infrastructure investment decisions, specific projects and initiatives. Through this Policy Council will be better informed in coordinating investment, activities and programmes in and around centres.

The Centres Policy categorises each Suburban Centre zoned area into either 'Centres', 'Live/Work Areas' or 'Work Areas'. Centres are primarily retail focussed and function to provide for peoples day-to-day retail needs. They also provide an important social focal point for their local communities. Live/Work Areas are mixed use areas comprising a mix of business, commercial, retail and residential activities. Most Live/Work Areas have a commercial character about them. Work Areas are primarily industry and business focused and have an industrial character about them. Additionally this Policy outlines a hierarchy for the Centres based on their retail offer, catchment and function, which in descending order is:

1. Central Wellington
2. Sub-Regional Centres (Johnsonville and Kilbirnie, identified by the *Proposed Regional Policy Statement for the Wellington region 2009* as being regionally significant centres)
3. Town Centres (Karori, Miramar, Newtown and Tawa)
4. District Centres (Brooklyn, Churton Park, Crofton Downs, Khandallah, Island Bay and Newlands – all of these centres has, or is planned to have, a supermarket)
5. Neighbourhood Centres, of which there are 24 and they include small to medium sized groups or clusters of local shops

Some sites within locations identified as Neighbourhood Centres are currently zoned Residential, but were previously zoned Retail Shopping Zone under the District Scheme from 1986-1994. It is these areas that monitoring has also focused on in determining which zone they logically fit into.

The policy framework introduced by the Centres Policy is geared towards ensuring there is an appropriate place for all types of retail, commercial, business and industrial activities in the city. It considers the needs of local communities; as well as other important resource management issues such as infrastructure (including roading) to service development; where larger scale retail activities should be located; and the protection of land for industrial and business uses. Considerations on these issues are underpinned by the identified function of an area (its role for the city or local community), its location, transport options and infrastructure services.

This new policy direction identifies significant gaps in the current land use planning and zoning approach in the District Plan. If the District Plan provisions are to deliver on the Centres Policy, changes to the Plan will be required. In particular, issues not currently dealt with include vitality and viability of centres; safeguarding land for business and industrial use; managing retail; urban design; and infrastructure investment.

4.3.5 Johnsonville Town Centre Plan

The Johnsonville Town Centre Plan is a specific project identified in the Centres Policy, though was underway before the policy was adopted.

The project area for the Town Centre Plan encompasses all of the Suburban Centre zoned land within Johnsonville and all land within an 800m radius extending into the surrounding residential area (or a 10 minute walk from the centre). The Plan provides a blue print for the future growth and development of Johnsonville along with improvements in public transport, public space, urban design and community facilities.

The current Suburban Centre zone provisions would not facilitate the Town Centre Plan, and amendments are needed to see the plan come to fruition.

4.3.6 Built Heritage Policy

Council adopted its Built Heritage Policy in June 2005. The Policy set out the Council's intentions for the city's built heritage over the next 10 years. In developing this policy Council notified all the building owners as well as all interested groups as part of its consultation process. To date, this policy has resulted in District Plan Changes 53 and 58 that have affected Suburban Centre zone locations. This has included several individual listings of commercial-type buildings and the row of shops on the eastern side of The Parade in Island Bay which have been recognised as a Heritage Area.

4.3.7 Sense of Place

In 2004 the Council published *Wellington – Our Sense of Place, Building A Future On What We Treasure*. The Council's goal for Wellington is quality of life, growth and prosperity. In striving for this goal Council wants to ensure that what makes Wellington special is preserved. Council researched what Wellingtonians treasure about their city and what gives it its unique character or essence – its sense of place. In resource management terms these are the amenity values of the city. Understanding this sense of place helps define what must be protected and enhanced as the city grows. The following ten key characteristics have been identified:

1. Good accessibility, including public transport use and easy walking within and between parts of the city
2. A compact and integrated urban layout
3. The pivotal role – and diverse and vibrant character – of the central city
4. The natural character of the significant ridgelines and hilltops and the coastline, and the significance of the Town and Green Belts
5. The role as centre of the nation – a successful host of the government and Treaty of Waitangi negotiation and management
6. The growing range and size of the creative and cultural sectors
7. The range of events and recreation activities, both outdoors and indoors
8. The high quality and diversity of public spaces, including the prominent streets, parks and squares
9. The distinct character of communities, neighbourhoods, urban quarters and Suburban Centres – people and buildings – and the city's confident, unpretentious personality
10. The symbols, images, places and buildings that identify the people of Te Whanganui-a-Tara and Wellington city and tell their history.

These characteristics weave themselves into people's perception of their cultural and social wellbeing and appreciation of amenity values, and therefore are resource management issues. Of particular relevance to the Suburban Centres review are points 1, 2, 3, 8, and 9. These principles will help set the scene for the objectives,

policies and methods of the Suburban Centres zone and chapters. Presently these matters are not well considered in this zone of the District Plan.

4.4 Regional Level Strategic Policy Directions

4.4.1 Regional Policy Statement

The Act requires all District Plan provisions to be in line with any regional policy. In reviewing the Suburban Centres chapters, officers have had regard to the Proposed Regional Policy Statement 2009 and are of the view the proposed provisions are consistent with giving effect to its content where relevant.

The Regional Policy Statement¹ seeks to achieve the integrated management of the natural and physical resources of the whole region (s59 of the Act). Of specific relevance to the Suburban Centres are matters covered in:

- Energy, infrastructure and waste
- Fresh water, where streams run through the zone
- Historic heritage
- Natural hazards
- Regional form, design and function
- Resource management with tangata whenua

4.4.2 Wellington Regional Strategy

The regional and territorial local authorities of the region have developed a non-statutory 'regional strategy', published as the Wellington Regional Strategy. Many of the principles of this strategy have fed into the Council's own strategic vision for the city in the Urban Development Strategy 2006 and the Centres Policy 2008. The strategy work outlines a vision that deals with social, economic, infrastructure, competitiveness, growth management and demographic matters for the region. The District Plan therefore needs to reflect these directions in its objectives and policies.

4.5 National Level Context

In reviewing the Suburban Centres chapters, recent national-level policy directives have informed the Council's understanding of sustainable management. These include:

- Amendments to the Resource Management Act (2003 and 2005) that have:
 - Elevated protection of historic heritage to a matter of national importance (s6(f)); and
 - Introduced the efficiency of the end use of energy as a matter to have regard to (s7(ba)); and
 - Introduced the benefits to be derived from the use and development of renewable energy (s7(j)).
- New Zealand Urban Design Protocol, 2005 to which Wellington City Council is a signatory
- National Guidelines for Crime Prevention through Environmental Design in New Zealand, 2005
- Sustainable Development For New Zealand Programme of Action, 2003
- National Policy Statement on Electricity Transmission 2008 (NPSET)

¹ The Regional Policy Statement is currently under review by Greater Wellington Regional Council as required under the Resource Management Act.

5. Monitoring, Research and Issues

5.1 Monitoring

An extensive monitoring exercise was undertaken of all the City's Suburban Centres, as well as other small retail centres and other non-residential activities located in the Residential Area zone, and information documented on what was found. The findings are recorded in the document '*Wellington City District Plan Monitoring Report, Wellington's Suburban Centres 2007/2008*'.

Specifically the monitoring considered and recorded information under the following topics:

- function of the area (including what activities are occurring, where the main retail streets are, how the area appears to be performing and what the overall character is);
- urban design qualities including the streetscape and public spaces;
- access (pedestrian and vehicular), public transport to and around the area and parking;
- interface issues, what's happening at the zone boundaries;
- out-of-centre activities occurring in the residential zone; and
- developments approved since 1994.

The information gathered provides an important state-of-play in how the current Suburban Centre District Plan provisions are working. Full findings are recorded in the monitoring report, however below are some of the main issues that were identified:

5.1.1 Variety and choice

Many of the larger centres were found to be lacking in variety and choice of retail, and did not offer much in the way of residential living, entertainment or recreational activities. These factors can reduce a centre's ability to fully service its catchment population, and reduces its safety at night. It also means that environmental and social benefits of people living within walking distance of a range of major facilities and services are not maximised. Many centres were identified as places where increased residential activity would be beneficial, however it was also recognised that in some circumstances the 12m height limit and small land holdings provide barriers to achieving this. Amending height limits in appropriate places could help to address these issues, as this would allow residential development above retail floor space and provide better, more economic options for redevelopment.

5.1.2 Urban design quality

Monitoring shows there are poor urban design qualities in many of the City's centres. This has resulted from a lack of design controls over buildings and site layout of new developments, low-quality buildings, poor signage, unsuitable location of some recent developments, little consideration for context and insufficient focus on the street as a key public space. Furthermore, the form and function of many centres went beyond the zone boundaries, and so properties that function as part of a centre are not captured by the zone.

Shopfront window and verandah requirements have been identified for many centres (refer Planning Maps 43 -49A). However, often these do not capture the full length of all key retail frontages in most of the centres; do not capture properties that are out of zone but part of a centres' function; are only effective at the ground floor level; and do not have any design control about them (just a requirement to provide shop frontages and verandahs). In some cases, like at Miramar, open-air parking has emerged on a

key retail frontage because it was not identified in the Plan. The current controls were therefore found to be largely ineffective in providing a reasonable quality streetscape.

Monitoring has also identified that in the broadening of the Suburban Centre zone (when the ‘one size fits all’ approach was applied over areas of land that were previously held in two or more retail, industrial or business zones), there have been lost opportunities to better connect activities within centres. Poor urban design results are evident in places like Kilbirnie, where the Pak’n’Save supermarket is located on what was previously industrial zoned land. This development has very poor pedestrian links with Bay Road, the main shopping street in Kilbirnie, which contains service retail such as the post office and banks, as well as other retail outlets. Because Pak’n’Save is a retail anchor, it becomes the destination for many shoppers to Kilbirnie, and thus Kilbirnie misses out on foot traffic that would otherwise significantly boost its vitality and viability. This scenario is echoed in other Suburban Centre locations and it is evident that many centres could benefit from urban design guidance.

District Plan Change 52 introduced urban design criteria for larger buildings over 500m² in floor area, but because of the absence of any detailed design guidance, these new provisions are not necessarily resulting in a higher quality urban design outcomes. This is mainly because the controls introduced in District Plan Change 52 are too broad and not sufficiently refined to deal with all urban design issues. Monitoring has however shown that in Thorndon, where specific design controls do exist, much better urban design results have been achieved.

Monitoring has also identified that in some locations, and due to the character and location of some Suburban Centres zoned areas, strict design controls are not always required. Such areas are more industrial in nature and are not visible from any main public street or place.

5.1.3 Managing effects of activities and reverse sensitivity

Whilst Suburban Centres on the whole have a wide mix of uses, the effects that mixed-use activities have on neighbouring properties, both within and adjoining suburban centres, needs careful management. Monitoring has identified that several issues with the current zone provisions require better management, including noise, building bulk and height, wind, signs, and zone interfaces with residential areas.

Noise, in particular, appears to be an issue when residential uses have established in areas with a more industrial character like at Greta Point, Evans Bay, Tawa and Miramar and in such cases needs careful management. Conversely, in some cases, higher noise thresholds could be adopted, to encourage a wider range of uses.

Building bulk and height appears to be an issue at locations where new development has located alongside an adjoining residentially zoned property. Whilst there were only a few building bulk issues identified, this was mainly because many sites were not developed to their full potential under the District Plan. Where they have been developed to their full potential, buildings were obtrusive to residential neighbours. One such example is in Island Bay where infill development behind the main street shops adjoins properties on Clyde Street.

Wind is a problem on some main shopping streets. Any increase in building heights would exacerbate this and so wind provisions in some main locations such as Johnsonville, Adelaide Road and Kilbirnie should be considered.

Prolific, large and inappropriately located signage was evident in a number of shopping centres. In such cases signage was detracting from the appearance of the centre. It was evident more control over signage would be appropriate.

Most centres highlighted the potential for interface issues to arise from new building developments (built in accordance with the current bulk and location standards).

Several centres contained extensive residential activities in areas with an industrial character including at Greta Point, Miramar, Tawa and Evans Bay giving rise to potential reverse sensitivity effects. In all cases developments were by unit title and involved townhouse developments. These activities have altered the character of their locations, and introduced an activity that is sensitive to its receiving environment. Not only can this be difficult for existing activities, but it discourages other industrial activities from continuing to locate in industrial areas, and hence they find alternative places, often outside of Wellington City.

Residential amenity values are also a key issue that needs better consideration. Several centres contain residential units, some of which were found to generally provide sufficient on-site amenity values such as access to outdoor space, daylight and noise protection. However not all developments appeared to accommodate these values. With the UDS seeking to intensify residential activities in many centres, guidance around the provision of an appropriate level of amenity values is likely to be required.

5.1.4 Traffic Generation and Parking

There are currently few controls on parking in the Suburban Centres zone. Monitoring has identified that:

- Many of the older, smaller centres such as Thorndon, Kelburn, Wadestown and Northland rely heavily on kerbside parking and have limited capacity for additional parking, servicing and loading.
- Centres that provide easily accessed centralised parking (such as at Johnsonville, Ngaio and Marsden Village), or that have private or kerbside parking (such as Island Bay and Khandallah), appear more vibrant and perform better than those without such parking available.
- Commuter parking, where people ‘park-and-ride’ for a bus or train, was a significant issues in some locations such as Johnsonville and Wadestown, resulting in less availability of kerbside parking within centres, and overspill of parking to surrounding residential streets where residents are having to compete to parking spaces outside their homes.
- Employee parking, when employees of local businesses drive to and park in proximity to their place of work, was a significant issue in areas such as Miramar North. Again this is resulting in less availability of kerbside parking within centres, and overspill of parking to surrounding residential streets where residents are having to compete with employees for parking spaces outside their homes.
- The layout and ad hoc nature of parking has resulted in poor outcomes for some centres such as Kilbirnie and Miramar. This appears to have occurred from the expansion of activities away from the traditional main shopping streets with no consideration as to connectivity of activities.
- Parking and loading spaces on street edges has detracted from the streetscape in several locations.
- Several resource consents were applied for and granted over the non-provision of loading spaces in circumstances where traditional shop layouts mean there is no rear access to provide loading areas. This was mainly happening in smaller centres. The loading provision seemed superfluous in these circumstances.

Monitoring has therefore identified that parking is a pivotal issue in all centres and there needs to better controls over some aspects of parking, particularly around the provision of parking for employees, the provision of public parking and the location and layout of parking areas. The District Plan is able to provide policy guidance and rules to address most of these issues, however the provision of public parking to support centres and transport options is a more difficult issue that needs a Council wide approach as well as District Plan provisions.

5.1.5 Loss of industrial Land

Research has identified there is a shortfall of industrial land in Wellington city that is likely to result in negative economic conditions for the city. Places where significant land loss to residential and retail activities has occurred was evident in several locations including at Miramar (residential and retail), Kilbirnie North (residential and retail), Greta Point (residential), South Karori (residential), Tawa South (residential and retail), Kaiwharawhara (retail), Quarry (residential retirement village) and Berhampore (residential).

Because the Suburban Centre zone has no limits on density of residential development, all of the developments are high density units owned in unit title. These types of land tenure are particularly difficult to reverse because they involve many owners bound together in a body corporate structure. This means where these developments have occurred, the change in character they bring to an area is permanent. Accordingly, proposed rezoning of Suburban Centre zoned land to a Residential Area zone was identified for the following locations:

- Palm Grove apartments in Berhampore
- South Karori Road and Arlington Road, unit title town houses
- Tacy Street units in Kilbirnie North
- McAllister Place units in Miramar
- Tahi Street units in Miramar
- Brussels and Byron Street units in Miramar
- Malvina Major Retirement Village on Burma Road, Quarry (Johnsonville)

In order to stem this loss of land, some direction needs to be provided over the appropriate location of retail and residential activities. Additionally, the need to identify locations where business or commercial zone expansion can be provided for needs further work. This work was carried out through preparing a draft Plan Change for consultation, and is discussed below under the consultation section.

5.1.6 Retail Activities

Research confirms the importance of retail activities to the vitality and vibrancy of local shopping centres. Retail is the key activity in a shopping centre even though these centres perform a social role as well. Monitoring indicates that a small number of centres (including Kingston, Newlands and Linden) appear to be struggling economically and have a poor retail offer. Some, like Newlands, lack 'anchor' uses, such as a supermarket and, as a result, struggle to retain retail tenants. Others lack variety or are poorly located. It was identified that Newlands, in particular, requires better land use planning to assist in a recovery.

In other circumstances the disjointed location of retail appears to be negatively affecting centres like at Kilbirnie and Miramar. Miramar has had a small retail centre open on the western end of the centre, away from the main shopping street so the centre is now effectively 'split' in half making it dysfunctional. In both locations there was evidence of shop vacancies, loss or relocation of key retailers (including the Westpac bank in Miramar), and a lack of recent improvements or developments in these centres.

Recent retail developments, such as the bulk retail parks at Rongotai and Cobham Drive also appear to be having an impact on nearby centres such as Kilbirnie. Kilbirnie retailers advised that in the first Christmas shopping period since the Rongotai retailing opened, sales have been down and have not recovered, and that 16 retailers have either closed or relocated out of Kilbirnie.

From visiting these centres it could not be established however, whether it was the loss of shoppers to the new developments or the poor access between these areas that

was the main problem. It is likely to be a combination given Rongotai is only a 500m distance from Kilbirnie (but further from Miramar). In meetings with Kilbirnie retailers, their point of view was that poor connections between the areas and the lack of a ‘gateway’ to Kilbirnie were significant issues in safeguarding the viability of Kilbirnie. Additionally there was concern over the retail offer, and if this continued to expand it could undermine the existing centres at Miramar and Kilbirnie.

Retail has also contributed positively to some areas, like at Kaiwharawhara where some large format stores, such as ‘Spotlight’, and home renovation stores have clustered. These outlets along with the introduction of residential activities, has increased the vibrancy of the area by introducing shop frontage windows on main streets and increasing activity and visitors to the area.

5.1.7 Out-of-centre shops

Several small groups of shops located in the Residential Areas zone were considered in terms of their performance and need for protection to service local day-to-day retail needs. Those identified for a zone change from Residential Area to Suburban Centre are:

- Shorland Park shops, The Parade, Island Bay
- Mersey Street shops and theatre, The Parade, Island Bay
- Rintoul Street shops, Berhampore
- Onepu Road shops, Lyall Bay
- Broadway Road shops, Strathmore (airport end)
- Darlington Road shops, Strathmore
- Maida Vale Road shops, Roseneath
- Tringham Street shops, Karori
- Standen Street shops, Karori
- Crofton Road shops and mechanic, Ngaio
- Newlands Road shops and service station, Newlands
- Collins Ave shops, Linden

All of the above groups of shops were identified as providing important local day-to-day needs for their communities and should therefore be recognised as such through appropriate zoning.

5.1.8 Zone boundaries and containment

One of the key policies in the Suburban Centres zone is that of containment, whereby suburban centres activities should be contained within the zone boundaries or a plan change sought. However, monitoring has identified a number of locations where zone boundaries do not match with the established activities making up the function of a centre; or where resource consents have been granted for non-residential activities in a residential zone adjoining or adjacent to the suburban centre zone. Out-of-zone activities identified include retailing (including shops with verandas and display windows), community type activities such as libraries, service stations and health services such as medical centres. In these circumstances zone expansion has been identified as a possibility including in the following locations:

- Ngaio
- Berhampore
- Newlands
- Brooklyn
- Crofton Downs
- Johnsonville
- Karori
- Khandallah
- Kilbirnie

- Marsden Village
- Miramar
- Newtown
- Northland
- Thorndon

In addition to the above residential developments have occurred in several locations, including at ground floor level. A summary of the proposed rezonings is detailed in Part G of this document.

5.1.9 Vitality and viability

It is evident that a range of factors create vibrant and viable centres, including:

- good anchor tenants such as a supermarket;
- variety in retail offer;
- abundant parking;
- safe and useable open space with well located street furniture;
- attractive main streets;
- high frequency of public transport;
- community and public facilities (toilets, libraries etc);
- healthcare;
- accessible layout; and
- good urban design.

Of all of these factors parking, accessibility and urban design qualities appeared important to all centres no matter what their size, whereas anchor tenants, variety in retail offer and public transport appeared important to the medium to larger sized centres (Sub-Regional, Town and District Centres). Monitoring showed that many centres were lacking in vitality and viability.

5.1.10 Heritage

A number of centres were identified as potentially having heritage values that needed further investigating to determine if protection of those values is necessary. A further investigation was then carried out and all Suburban Centre areas looked at. The findings were that heritage values existed in the following centres:

- Aro Valley
- Berhampore
- Hataitai
- Island Bay - Shorland Park Shops
- Island Bay – The Parade (already identified as a Heritage Area)
- Newtown - Main (identified as a “Character Area” in the operative District Plan)
- Newtown - John Street Intersection (identified as a “Character Area” in the operative District Plan)
- Thorndon (identified as a “Character Area” in the operative District Plan)

Brooklyn and Kelburn were found to have special character qualities and accordingly have been identified in the appendices to the Centres Design Guide.

Given the complex nature of heritage issues, further consideration will be given to each of the individual areas put forward as to whether heritage protection is the best way to manage the identified groups of buildings. It is proposed to recognise these areas as part of a separate plan change that will be prepared at a later date.

5.1.11 Identification of Brownfield opportunities

Shelly Bay is an existing brownfield area that was identified as having broad development potential. Throughout monitoring other areas were also recognised as being potential future brownfield areas that could benefit the city through

redevelopment potential, including Ropa Lane in Miramar, and parts of the quarry in Ngauranga Gorge. However there is no current policy to support redevelopment of areas as they are released from current uses.

5.2 Research

There have been several studies undertaken around the key issues of retail management, loss of industrial land, heritage, urban design and zoning. Some of the studies were carried out before the review began, and others have been commissioned throughout the review as the issues became clearer and more defined research was required to understand them better. Additionally, a Draft Plan Change was prepared and consulted on, which has provided important feedback on the key issues.

5.2.1 Retail

With regard to retail, there have been four separate studies carried out. The main issues identified in the retail sector are:

1. Fragmentation of the retail sector
2. Supply or undersupply of retailing
3. Location of large format retailing
4. Distributional and economic effects related to the location of retail activities.

Following on from these studies, Officers carried out a risk assessment to ascertain where potential new retail centres might establish and result in either positive or adverse distributional and economic effects.

Fragmentation of retail and supply issues:

In 2003, Hames Sharley carried out the first retail study and produced the report *Spatial Analysis of Retailing in Wellington*. This study identified that the fragmentation of the retail sector (and bulk retailing in particular), is adversely impacting on the social and economic performance of some traditional town centres, and that looking ahead to 2021, many of the inner city suburban centres were potentially undersupplied for their retail offer including Island Bay, Khandallah, Miramar and Karori. Of these centres Karori, in particular, has a very high demand for growth but a very low capacity for it, so rezoning residential land to increase the size of the Karori town centre was considered to be a key option for growth.

The above findings led to two further investigations in terms of the issues raised around Karori. Property Economics carried out the *Karori Retail and Office Floorspace Analysis in August 2004*, and Connell Wagner looked at *Karori Expansion Options Suburban Centre Land* in September 2004. Both of these studies have assisted in putting forward rezoning options for Karori.

Location of large format retailing:

The 2003 Hames Sharley study identified that Wellington is under-represented in terms of the amount of bulk retail (or large format retail) floor space currently available when compared to other major centres in New Zealand. The study also identified that the current retail offer is fragmented in location, and bulk retailers have difficulties in establishing in an optimal location in terms of site size and land cost. These are significant issues for the retail sector in Wellington and because of land access issues, a further report was carried out on this topic.

Property Economics and Patrick Partners prepared a report on *Options for Large Format Retailing in Wellington City*, wherein ten sites around the city were considered for their suitability across a range of factors. The study highlights the difficulty of entry into the Wellington market that retailers face due primarily to land scarcity and price and the need to consider out-of-centre locations. Secondly, the

study highlights the importance of retail as a key player in successful centres and therefore the need to carefully consider the impacts of out-of-centre locations for large format retail activities.

The report makes it clear that international research shows that retail activities are vital to the health and vitality of centres, *and* that centres are fundamentally important to the social, economic and environmental health of a city. Therefore any retail policy introduced into the District Plan aimed at providing for large format retail needs needs to be a servant of the Centres Policy and not the other way around.

Distributional and economic effects of retail activities:

Because of the identified importance of retail activities to centres, and the effects that out-of-centre retail activities can have on centres, two further studies were carried out.

Property Economics and Harrison Grierson re-looked at these issues in their report *Retail Spatial Analysis for the Suburban Centre Review, 2008* and concluded some similar findings to the Hames Sharley 2003 report: that several centres would in the future or are currently now undersupplied for retail floor space including Miramar, Kilbirnie, Newtown, Karori, Tawa and Johnsonville. Furthermore, based on targeted infill and growth, new centres at Lyall Bay, Churton Park and Lincolnshire Farm would be able to sustain a larger retail floorspace offer.

The report identifies that bulk retail centres are offering uses that would otherwise normally be expected to be located in centres. Anecdotal evidence has indicated that retail floorspace in Kilbirnie has not substantially grown over the last 15 years or so. This may be as a result of the large-format retail development that has occurred at the Rongotai Airport Retail Park. On this basis it is recommended that bulk retail areas be recognised and subject to their own policies and objectives in the District Plan, and that Kilbirnie in particular requires investment to respond to the challenges it currently faces. Investment would be either by developing its alternative offer or by increasing its diversity of offer in conjunction with environmental enhancement and repair to the urban fabric.

This report makes a number of other recommendations based around improving the viability and vitality of centres at all levels; and includes a recommendation to separate out industrial type areas from centres and provide for them separately in the District Plan.

Finally, a further report was commissioned to specifically look at the potential distributional adverse effects from out-of-centre retailing, Property Economics and Planit Associates provided the report *Retail Threshold and Definition Assessment, Development of a policy and rule framework, 2009*. This report studies the actual potential impacts of different types and scales of retail activities when located both within and outside of centres, and develops a possible policy and rule framework around these issues and findings. Comparisons were drawn from other examples of dealing with these issues at District Plan level around the country. Eleven recommendations are made to tackle these issues based on amending the *Draft Plan Change* that was consulted on in 2009.

The recommendations consider:

- retail issues and definitions
- the importance of the retail hierarchy centre function
- identification of potential growth areas
- recognition of regionally significant centres
- provisions for out of centre retailing (and assessment criteria around appropriateness
- avoiding distributional effects and compatibility with adjoining land uses)

- setting appropriate floor area thresholds (upper and lower)
- considerations towards supermarkets and their role in centres
- appropriate definitions for retail activities and identifying a large format retail precinct.

This report provides a sound analysis of the issues around retail management and considers practical ways of addressing them.

In terms of analysing future threats to centres from potential new unplanned retail centres, a risk analysis was carried out by Officers to ascertain how many of the Suburban Centre areas, characterised by mixed-uses, were potentially at risk from being developed into unplanned centres with retail as their key activity. The analysis identified several areas where centre-like retail developments could easily occur, thus pose a threat to existing centres if not appropriately planned. At the same time, some positive distributional effects were recognised for some locations.

5.2.2 Industrial land shortage

The emergence of residential and retail activities in traditionally business, commercial or industrial places has created several problems. Firstly it has become difficult for small to medium-sized industrial and business activities to find land and premises within the city boundaries because of the increased competition for a finite land resource. Many industrial activities have relocated to the Hutt or Porirua as a result. Secondly there have been significant increases in land values and hence rents, with industrial use being pushed out by the higher-value retail and residential activities.

Property Economics considers these issues in the report *Wellington Industrial Land Assessment*, September 2007. Herein they conclude there is approximately 40-70Ha of shortfall in land supply for industrial activities over the next 15 years and this has the potential to affect the city's economy in the future through a lack in diversity. One of the key messages is that there is an urgent need to recognise that a broad range of industrial activities are not occurring in the city because of land price and availability, the current permissive zoning regime and predominant uptake of Suburban Centred land by non-industrial activities, and the opportunities that exist north of Wellington for industrial activities. The current District Plan provisions are providing a situation where industrial activities are 'losing out' to the highest and best use activities. The report also examines rising land costs, land availability and characteristics that make for successful industrial locations. It is clear that unless there is a policy change, industrial activities in the city will continue to decline and undermine diverse economic performance and ongoing employment prospects in the city.

5.2.3 Wind

The Aerodynamics team at Opus International Consultants Ltd were asked to carry out an assessment of the existing pedestrian wind conditions and wind issues in Suburban Centres, which through monitoring, had been identified as having potential wind issues. Consideration was given to proposed permitted building height increases. Their findings are given in a letter to Council dated 27 February 2009 and entitled *Wellington City Suburban Centres – Height Limits and Wind Effects*.

Areas considered were Johnsonville, Kilbirnie, Adelaide Road, Glenside, Kaiwharawhara, Kilbirnie North, Park Road (Miramar), Tawa East, Collins Ave, Grenada North, Newlands/Ngauranga and Ngauranga. Of all these places, those with wind conditions considered to be in excess of typical Wellington conditions include Johnsonville, Kilbirnie and Adelaide Road.

In consideration of building height and wind, it is recommended that due to Wellington's generally windy conditions, buildings 18m or more in height be assessed

for their impacts on wind speed at street level. Opus also recommended varying degrees of assessment and technical reports depending on initial findings of effects.

5.2.4 Heritage

Following monitoring, a report was commissioned on identifying heritage values in the centres. This work was carried out by Michael Kelly (Historian) and Russell Murray (Conservation Architect) in collaboration with Officers and resulted in the following areas being identified as having heritage values worthy of protection:

- Aro Valley shops
- Berhampore shops (Rintoul Street)
- Hataitai shops
- Shorland Park Shops (Island Bay)
- Island Bay Village
- Newtown Central
- John Street intersection (Newtown)

5.2.5 Zoning considerations

In light of the zoning issues that emerged through monitoring and research, all proposed rezonings were tested against set criteria to determine if proposed rezonings were necessary. The proposed rezonings have been appended to this report.

6. Consultation and briefings

6.1 Consultation*

From November 2007 until 1 April 2009, Wellington City Council requested feedback from the public on issues and the performance of the operative Suburban Centre zone, and latterly a *draft* Plan Change. Discussion meetings were also held with stakeholders (landowners and occupiers, retailers, commercial real estate agents, Councillor and community groups). The consultation is summarised in the table below:

Date	Details
November 2007	'Help shape our suburban centres' pamphlet and questionnaire sent to every landowner and occupier and stakeholder groups in the suburban centres. Over 100 responses were received.
November 2007 – February 2008	Meetings with stakeholder groups on issues and current suburban centres zone provisions, including: <ul style="list-style-type: none"> • Community groups - Karori Liaison Group, Wadestown Residents Association, Kilbirnie Retailers and the Highland Park Progressive Associations Inc • Commercial real estate agents – Bayleys and Colliers International • Land owners – Prime Property
4 December 2008	Our Wellington (Dominion Post) article and notification for consultation period on draft Plan Changes
8 December	Consultation period officially starts
8 December	Mailout to all Wellington City residents and ratepayers advising of <i>draft</i> Plan Change consultation

9 December	Summary guide and <i>draft</i> Plan Change documents delivered to all Wellington City libraries/service centres
11 December	Mailout to ratepayers that own property in or neighbouring areas proposed to be rezoned from: <ul style="list-style-type: none"> - Outer Residential to Area of Change
11 December	Mailout to ratepayers that own property in areas proposed to be rezoned from: <ul style="list-style-type: none"> - Suburban Centre to Residential - Residential to Centre, Live/Work, or Work - Suburban Centre to Centre, Live/Work, or Work - Minor open-space rezoning
17 December	Mailout to interested organisations and residents' associations to advise them of the draft Plan Change.
11 February 2009	Combined Residents Association briefing
12 February	Tawa Community Board briefing
25 February	Project Kaiwharawhara meeting
25 February	Reminder advert in Capital Times
25 February	Councillor briefing
26 February	Reminder advert in The Wellingtonian
26 February	Reminder advert on Our Wellington page (DomPost)
3 March	Kilbirnie Residents Association meeting
4 March	Presentation to New Zealand Planning Institute/NZ Institute of Surveyors
4 March	Reminder advert City Life - (South & East)
4 March	Reminder advert City Life - (North & West)
6 March	Property Council briefing
9 March	Presentation to Rongotai Revived
9 March	Presentation to New Zealand Institute of Architects
10 March	Disability Reference Group briefing
16 March	Newtown Residents Association
17 March	Shorland Park Shops Heritage Area meeting
18 March	Mailout to ratepayers that own property in the proposed Suburban Centre Heritage Areas
1 April	Main review consultation period close
20 April	Proposed Suburban Centre Heritage Areas consultation period closes
28 May	Summary of consultation sent to submitters. Potential heritage area building owners advised that heritage areas would be considered as part of a separate plan change

*Note that extensive consultation was also carried out with the various strategies and policies that contribute to Suburban Centres review including the UDS, Centres Policy, Adelaide Road Framework and the Johnsonville concept plan.

6.2 Results from ‘Help shape our centres’ pamphlet/questionnaire

In this pamphlet the five key issues were raised, loss of industrial land, managing retail, providing for growth, urban design quality and environmental issues. In short the results are as follows:

1. Loss of industrial land – only 1/3rd of respondents consider there should be restrictions retail and residential activities in traditional industrial areas.
2. Managing retail - the majority of respondents, 82%, consider there should be some degree of control of retailing activities outside of town and local centres.
3. Providing for growth – 75% of respondents saw changes occurring in most centres. 42% consider growth should be provided for by more intensive development of existing zoned areas, 20% by increasing the size of zoned areas and 15% consider Greenfield development would be the best way to provide for growth.
4. Urban Design Quality – 84% of respondents consider urban design quality and buildings should be improved. Development examples that respondents liked are Chews Lane; the new buildings on Kaiwharawhara Road; the Waitangi Park redevelopment; the new townhouses on Avon St (Island Bay); the redesign of some of the streets in Newtown has “made the street more pleasant and easier to access pedestrian crossings”; and the Thorndon shops in Tinakori Road. Buildings or developments people. And examples of recent developments respondents considered were poor or not so good include the large-format retail at Rongotai; the apartments on the corner of Ohiro Road and Cleveland Street in Brooklyn; the Brooklyn Rise development; the shopping complex at Tauhinu Road, Miramar; and the recent residential developments at Greta Point.
5. Environmental Issues – matters raised by respondents include noise, building size, loss of sunlight, building appearance and living space for residents (56%); parking and traffic issues (26%); and impact on streams and the coastline (15%).

6.3 Results from Draft Plan Change Consultation

The consultation process enabled submitters to comment on a wide variety of issues in their local neighbourhoods and the city’s suburban centres. Key issues that were particularly commented on were:

6.3.1 Strengthening the City’s Suburban Centres

Many submitters agreed with the policy direction of strengthening the city’s centres and recognising areas of land suitable for business and industrial activities. Others felt the draft provisions were unnecessary and over-complicated.

6.3.2 Managing suburban retailing

Many submitters had an opinion on where retail should locate and why. Many of those that supported the draft provisions were mostly concerned about the location of retail and its impact on established centres and existing neighbourhood environs. Many submitters in opposition considered that the concept of protecting established centres was outdated and opposed consumer demand and a market-led approach.

Retailing in the Rongotai South area had particular coverage in the submissions. Specifically, Rongotai Revived (a group of local businesspeople and property owners who have interests in land in Rongotai South) circulated a petition that opposes

restrictions on retail, promotes large-format retailing and opposes noxious industries in Rongotai. The petition, which formed the basis of Rongotai Revived submission, had 2476 responses in support and 12 responses in opposition.

6.3.3 Suburban Centre Heritage Areas

While a good proportion of submitters supported heritage areas, almost all of those opposed were building owners or those that had commercial interest in the areas proposed. Those in support liked the contribution that the buildings made to local neighbourhoods. Those opposed felt the buildings did not have heritage value and a heritage area would impose an unfair financial burden on land owners.

6.3.4 Rezoning

Most submitters supported small scale shops in their local area and considered the rezoning an appropriate tool to recognise uses of properties. Respondents opposing the proposed re-zonings included perceived impacts on the value of their property and suitability of rezoning. Those respondents that supported the proposed rezonings were of the view that the rezoning would better recognise the use of their property and also provide greater flexibility for any redevelopment of their property in the future.

Part C Examining the appropriateness of objectives – Centres

The following evaluations show the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act.

Some of the proposed objectives build on existing objectives of the Operative District Plan with some subtle changes, while other objectives are completely new. The appropriateness of the existing provisions was considered at the time of being included in the ‘first generation’ District Plan (in 1994). The evaluation below shows that the existing provisions continue to remain relevant and appropriate.

An evaluation of objectives under section 32 must examine:

(3) (a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act,

The purpose of the Act:

*5 (1) The **purpose of the Act** is to promote the sustainable management of natural and physical resources.*

(2) In this Act, “sustainable management” means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –

(a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.

The evaluation below considers each objective in terms of different elements that make up the purpose of the Act. That is, enabling people to provide for their *social wellbeing, economic wellbeing, cultural wellbeing* (5(1)), and in terms of sections 5(2)a, 5(2)b, and 5(2)c). The evaluation also considers other questions, such as:

- What would happen without it?
- Does it relate directly to the issue, and address a significant aspect of the issue?
- Would achieving the objective make a substantial difference, in terms of resolving the issue?

Policies, guidelines and other material on how to achieve that purpose are also referred to where relevant.

In assessing the extent to which the objective is the **most appropriate** way to achieve the purpose of the Act, it is necessary to look at the proposed policies and methods that will implement the objective. The analysis of those provisions should ideally reveal that the cost of pursuing the objective does not significantly outweigh the benefits.

6.2.1 To provide a network of accessible and appropriately serviced Centres throughout the City that are capable of providing goods, services and facilities to meet the day to day needs of local communities, residents and businesses, and of accommodating anticipated population growth and associated development whilst maintaining Wellington’s compact urban form.

Monitoring of the City’s existing Suburban Centres raised a number of issues, including:

1. The importance of Centres as resources containing significant investment in infrastructure and providing for the economic and social wellbeing of local communities and the city as a whole is not recognised in the policy framework of the District Plan.
2. Centres are not equipped to meet the anticipated demands from population growth, or provide sufficiently for the protection and expansion of existing infrastructure to accommodate population growth and associated development.
3. In order to support population growth in a sustainable way, Wellington needs to maintain its compact urban form.
4. Several Centres have a shortfall of land available to support the retail needs of their communities.

The new Centres zone recognises the importance of Centres as resources and the need for them to be appropriately managed. The above objective sets the overall policy framework for managing Centres in this new zone.

The objective aims to ensure the importance of Centres as places where significant investment in businesses and infrastructure have been made; to recognise their contribution to the economic and social well being of local communities and the wider city economy; and to reinforce the compact urban form that makes Wellington sustainable. This objective recognises that a network of Centres may include existing and possible new Centres if required to meet the needs of a growing population.

Within Centres, Council responsibilities for managing ‘natural and physical resources’ relates to the buildings, structures, roads, open spaces land², infrastructure and community services.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	This objective recognises the importance of Centres to a community’s need for access to shops and services that provide for day to day necessities and conveniences such as food, banking, post office,
Enabling – economic wellbeing	
Enabling – cultural wellbeing	

² Land, water, air, soil, minerals, and energy, all forms of plants and animals (whether native to New Zealand or introduced), and all structures (s2).

Enabling – health and safety	<p>chemist, clothes and footwear, healthcare and community services in accessible locations. Having all these activities conveniently clustered together in a ‘Centre’ provides for social and economic wellbeing.</p> <p>This objective also recognises the need for Centres to be well serviced by infrastructure such as public transport, roads, water, stormwater and sewer. This in turn provides for health and safety and allows Centres to function and develop efficiently. This objective also enables economic wellbeing by protecting the significant investments that have been made in existing Centres over many decades. Whilst new Centres may complement the existing network of Centres, Council must ensure that the establishment of new Centres will not undermine existing Centres, and investments made therein. Furthermore, promoting the maintenance of Wellington’s compact urban form will ensure the city grows in a sustainable manner.</p> <p>Centres are also places where community and cultural activities locate, if possible, in order to take advantage of being alongside shops and services used by people on a daily basis. This provides for the cultural wellbeing of communities.</p>
Sustaining the potential of natural and physical resources	Ensuring that economic and social activities are clustered together in Centres, and ensuring those Centres are well serviced will promote an efficient urban form and sustain the potential of Centres as important physical resources of the city.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Wellington’s population is expected to increase significantly in the future. This objective will give Wellington’s Centres the focus they need to provide for growth and serve the communities needs. Without this objective it would be difficult to focus development and infrastructure expenditure in Centres, as the previous market-led approach has shown, thus leading to unsustainable development patterns. The Council’s Centres Policy (August 2008) provides guidance on how to focus city expenditure based on the Centres Hierarchy and community needs.

- ***Does the objective relate directly to the issue, and address a significant aspect of the issue?***

Yes. The objective relates directly to the issues raised around the importance of Centres to their communities and economic and social prosperity, protecting infrastructure and being able to accommodate and provide for growth in a sustainable way.

The concept of efficient resource use is closely tied to sustainability. The Wellington

Regional Strategy (WRS) makes this link in seeking to ensure that land and infrastructure are used efficiently³. Furthermore, the growth framework promoted by the WRS considers spatial form ‘...important to people's quality of life, sense of community cohesion and safety, and flows into opportunities for economic growth...’

These goals are also echoed in the Proposed Regional Policy Statement for the Wellington region (RPS) which, amongst other things, focuses on regional form, design and function. In this regard the RPS states that ‘uncoordinated and sporadic development (including infrastructure) can adversely affect the regions form’ and also considers that a lack of integration between land use and the region’s transportation network can have a detrimental effect.

Sustainability and efficiency are also key concepts of the Council’s Urban Development Strategy (UDS):

More sustainable – Wellington’s urban form will support an efficient and sustainable use of our rural and natural resources and promote prosperity and social wellbeing over the long term (1.1(b)).

Better management of Centres will foster an efficient urban form in keeping with the direction of the WRS, RPS and the UDS.

An aim of the Long Term Council Community Plan (2006/07-2015/16) is for Wellington to be ‘more sustainable’ through reducing its ‘environmental impact by making efficient use of energy, water, land and other resources; shifting towards renewable energy resources; conserving resources; and minimising waste’ (4.5, Environment). A ‘more compact’ and ‘contained urban form’ is also sought ‘with intensification in appropriate areas and mixed land-use, structured around a vibrant central city’ (1.3, Urban Development). This objective will achieve these things by concentrating on existing Centres and re-developing them, whilst considering the need for additional Centres only if existing Centres cannot provide what population growth demands.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, this objective focuses on managing Centres to ensure they are equipped to provide for growth and the needs of communities whilst promoting a sustainable urban form.

The objective is also considered to be consistent with section 7(b) of the Act, which requires regard to be had to “the efficient use and development of natural and physical resources”. Better managing Centres will promote the efficient use and development of these important physical resources.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.2 To facilitate vibrant and viable Centres through enabling a wide range of appropriate activities to occur to meet the economic and social needs of the community, whilst avoiding, remedying or mitigating adverse effects.

³ Refer Action Area 2.9, ‘Internationally Competitive Wellington, a sustainable economic growth framework for our region’ 2005.

Monitoring of the City's existing Suburban Centres raised a number of issues, including:

1. Attributes that make Centres successful (i.e. Centres that are viable and vibrant) are not currently recognised or provided for.
2. Wellington is underrepresented in large-format retail floor space.
3. There is a shortage of available and appropriately sized and located land for the establishment of large-format retailing in Wellington.
4. There are distributional and economic impacts related to the out-of-Centre location of retail activities.
5. On-site residential amenity values are sometimes lacking in residential developments, detracting from residential amenity values.

Managing the attributes that make Centres successful is important to ensure Centres are successful in delivering on community needs and expectations. These attributes cross a range of resource management matters including the mix of appropriate land uses (particularly variety in retail offer), good urban design, managing the effect of activities on the roading network and managing adverse effects. This objective seeks to address issues around land use activities and the adverse effects they can create. Other objectives will consider urban design, built development and transport issues and effects.

Centres require a range and mix of activities to be successful, in particular retail activities are vital to Centres and are encouraged to locate within them. When a Centre has a good anchor tenant, such as a supermarket, they tend to perform well over time. One significant issue for Wellington is the location of large-format retailing and the lack of sites within the Centres zone to accommodate retail demand. Some re-zoning around Centres may assist in offering larger sites, together with greater building height provisions in Johnsonville Sub-Regional Centre and the Mt Cook Town Centre. It is anticipated, however, that some large-format retail activity will be located outside of Centres because of the lack of accessible and suitable land within Centres. Where large-format retailing is proposed to locate outside the Centres zone, any adverse effects on Centres (including any potential loss of vibrancy or viability) will need to be avoided, remedied or mitigated before such proposals could be approved. Additionally there will be policy guidance in the Business Areas zone to assist in considering these matters.

Another concern with retail activities is the establishment of very large malls which may have an economic impact or result in a loss of viability on the Golden Mile (Wellington's premiere retail strip). Council seeks to ensure that any large retail developments will not undermine existing investment in infrastructure needed to safeguard the viability of any Sub-Regional, Town or District Centre.

Other important uses in Centres include residential activities and community facilities. This objective will enable these activities to locate within Centres as of right, provided that any adverse effects they create can be avoided, remedied or mitigated. Distributional effects in the roading network are also a key consideration in Centres (See Access and Transport Objective).

This objective allows a variety of appropriate uses that are compatible with Centre functions. Those land uses not considered appropriate will become non-complying activities and include those activities listed under the Third Schedule to the Health Act 1956, cleanfills, landfills and quarrying. It is considered that adverse effects associated with these types of activities could not be avoided, remedied or mitigated in a Centres environment.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	<p>Centres that contain a range of activities, and in particular that have a variety of retail offer and good anchor tenants, tend to perform well over time, thus enabling social and economic wellbeing. This objective allows all activities to establish <i>provided</i> the adverse effects of them are avoided, remedied or mitigated.</p> <p>The exception is very large integrated retail developments of over 20,000m² or more (ie. a mall), which, due to their size, have the potential to adversely impact on the viability and vitality of, and therefore, diminish the social and economic wellbeing of the Central Area, in particular, the Golden Mile. Managing the size and location of very large retail developments will ensure the network of Centres throughout Wellington is effectively managed and still able to meet the economic, social and cultural needs of local communities.</p>
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	<p>Allowing a wide range and mix of activities to establish in Centres as of right will encourage development and sustain the potential of these important physical resources.</p> <p>Requiring all developments to avoid, remedy or mitigate adverse effects is directly in line with the purpose of the Act.</p>
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Without this objective adverse effects from activities both within and outside of Centres would go unchecked with a high probability of generating adverse effects that would detract from the viability, vitality and amenity values of Centres. Furthermore, activities within Centres can detrimentally affect amenity values of more sensitive neighbouring areas, such as Residential and Open Space Areas. For this reason, activities within Centres need managing too. Furthermore, to maintain viable and vibrant Centres the potential adverse effects of out-of-centre activities need to be addressed. Without this objective these issues would not be considered, and with a growing population, the potential for adverse effects on Centres is heightened.

- ***Does the objective relate directly to the issue, and address a significant aspect of the issue?***

This objective relates directly to the issues outlined above by dealing with both activities and the effects they can generate.

There has been much research done around the adverse effects that large-format retail and mall developments can have when located outside of Centres. At the same time it is well documented that Wellington is underrepresented in large-format retailing, and it is very difficult to find sufficiently-sized parcels of land within existing Centres to accommodate these developments. This objective seeks to address these issues through not limiting the location of retail activities unless they are unable to avoid, remedy or mitigate adverse effects on Centres. The primacy of the objective is to ensure that Centres are vibrant and viable.

The Urban Development Strategy seeks to concentrate development along a ‘growth spine’ between Johnsonville and Wellington International Airport. The larger Sub-Regional Centres of Johnsonville and Kilbirnie, the city centre with the Golden Mile and Adelaide Road are all located on the growth spine. This objective will ensure that these Centres are able to be developed and accommodate growth without any undue adverse impacts on their viability or vibrancy.

Increasing population densities within the growth spine is also anticipated under the UDS. This objective facilitates residential development; however rules and guidelines will be used to ensure residential amenity values within developments are appropriate.

• ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, because the significant issues around retail are addressed through this objective, recognising the difficulties this sector of the economy faces whilst making sure the adverse effects of large mall developments and out-of-centre retail do not undermine the sustainability of Centres. Furthermore, monitoring has identified adverse effects on amenity values both within Centres and in adjoining residential areas. This objective brings focus around these issues which previously has been lacking.

The objective is consistent with section 7(b) of the Act, which requires regard to be had to “*the efficient use and development of natural and physical resources*” and “*the maintenance and enhancement of amenity values*”. Restricting inappropriate land uses within Centres and managing the adverse effects activities will lead to the efficient use and development of Centres whilst maintaining and enhancing amenity values.

Enabling a wide variety of activities whilst managing adverse effects is therefore considered **appropriate** for achieving the purpose of the Act.

6.2.3 To ensure that activities and developments maintain and enhance the safety and amenity values of Centres and any adjoining or nearby Residential or Open Space Areas, and actively encourage characteristics, features and areas of Centres that contribute positively to the City’s distinctive physical character and sense of place.

Monitoring of the City’s existing Suburban Centres has revealed a number of issues relating to the quality of the built environment, urban design, and the amenity of adjoining residential activities.

Many Centres are poorly laid out and developments and activities within them are disconnected making these Centres difficult places to visit. In addition, in many

Centres, the main shopping streets lack attributes that make them attractive places to shop.

In some Centres building designs do not relate to context and are out of scale with surrounding development, with the result being dominating developments that detract from the amenity of the Centre.

Building bulk and height of some developments has had significant adverse impacts on adjoining residential properties. In addition, wind is an issue in many Centres, but is a particular nuisance on some main shopping streets in the larger Centres.

The key point of this objective is to ensure that land use and development contributes positively to the built environment and Centres develop as attractive places that are easy to get around.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Recognising and enhancing different areas and features that positively contribute to the physical character of Centres will help ensure a quality environment in which people can provide for their social, cultural and economic wellbeing. It is important that amenity values are appropriately managed so that people feel both comfortable and safe in Centre environments, and so that people can go about satisfying their day-to-day needs easily. The quality of the urban environment helps to ensure a sustainable urban form.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Monitoring and other research has established that when Centres are poorly designed, unattractive and unsafe they lose foot traffic and ultimately business.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	Maintaining a Centres' attractiveness through good urban design and avoiding, remedying or mitigating adverse effects from built development is therefore a positive way of sustaining the potential of these resources.

• ***What would happen without this objective?***

The Council seeks to strengthen Wellington's sense of place so that '*Wellington is a memorable, beautiful city, celebrating and building on its sense of place, capital city status, distinctive landforms and landmarks, defining features, heritage, and high quality buildings and spaces*' (Long Term Council Community Plan 2006/07-2015/16, Urban Development 1.5). An enhanced public amenity is one aspect of that sense of place. This concept also reflects Council's commitment to the Urban Design Protocol and making Wellington a 'more liveable' city (Urban Development Strategy, 1.1(a)).

Without this objective, new development in Centres will continue without considered assessment of the urban form quality. Monitoring and questionnaires on urban

design quality have identified dissatisfaction with current appearance and qualities in the built environment. This objective will help improve the appearance and quality of the City's Centres.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

The objective relates directly to the urban design issues identified and addresses them directly. Issues around urban design, quality in the built environment, character and sense of place are well canvassed in the Urban Development Strategy, Centres Policy, the Long Term Council Community Plan and Wellington's Sense of Place, Wellington Regional Strategy and the Urban Design Protocol. In all these policy directives and guidelines emphasise the importance of quality in the built environment in maintaining people's social, economic and cultural wellbeing. This objective addresses the significant aspects of built development and what makes places attractive.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, achieving this objective will ensure that the physical quality of Centres improves.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(c) the maintenance and enhancement of amenity values and 7(f) the quality of the environment.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.4 To promote energy efficiency and environmental sustainability in new building design.

Interest in energy efficiency and environmentally sustainable building design has grown in recent years. This proposed objective is new and reflects the Act's 2004 amendments that introduced new matters to have regard to in section 7: 'the efficiency of the end use of energy' and 'the benefits to be derived from the use and development of renewable resources' (s 7(ba) and (j)).

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Promoting energy efficiency and environmentally sustainable design (ESD) in new buildings means that people can design and use new buildings and structures in a way that reduces their demand on energy consumption and other resources. Energy efficiency can contribute to people's economic wellbeing where the financial cost of energy use is reduced. People can still provide for their social, economic and cultural wellbeing, and their
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	

	health and safety because energy efficiency and ESD can be achieved alongside building functionality.
Sustaining the potential of natural and physical resources	Promoting energy efficiency and ESD places less demand on natural and physical resources, including those used to generate and transmit electricity. To this end, the objective helps to sustain the potential of natural and physical resources, such as transmission lines, and where relevant safeguard the life-supporting capacity of resources and reduces adverse environmental effects, such as greenhouse gases.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

The issue of energy efficiency and sustainability are relatively new and without this objective, these principles maybe to be overlooked in new developments. Promoting energy efficiency and sustainability in District Plan objectives will ensure developers consider these issues from the outset when they can be best dealt with at the design stage of a project.

Does this objective relate directly to the issue, and address a significant aspect of the issue?

Promoting sustainable management is the core purpose of the Act. The 2004 amendments are also closely related to central government's Sustainable Development For New Zealand Programme of Action (2003), which promotes creation of a sustainable energy system for New Zealand (Ministry of Economic Development, 2004).

Likewise, an aim of the Long Term Council Community Plan (2006/07-2015/16) is for Wellington to be 'more sustainable' through reducing its 'environmental impact by making efficient use of energy, water, land and other resources; shifting towards renewable energy resources; conserving resources; and minimising waste (4.5 Environment).

The Ministry for the Environment also promotes the potential benefits of environmentally sustainable building design through publications such as *Value Case for Sustainable Building in New Zealand*, December 2005. This includes the benefit to building users of having an appropriate level of building amenity.

The proposed objective relates directly to the issue and takes on board policy guidance mentioned above.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

It is hoped that by promoting the benefits of sustainability in building design, developers will accommodate them. As technologies around green buildings are still developing, it is considered that promotion is currently the best way to resolve the issue for now.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(b) the efficient use and development

of natural and physical resources; 7(ba) the efficiency of the end use of energy; and 7(j) the benefits to be derived from the use and development of renewable energy.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.5 To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Centres.

Monitoring and other research of the City’s existing Suburban Centres raises a number of issues, including:

1. Growth and development associated with population growth will increase demand on the roading and public transport networks over the next 10 to 20 years.
2. Large retail developments attract many people and consequently have the potential to adversely impact on the roading network.
3. Good accessibility through roads, frequent public transport services, pedestrian, restricted mobility and cycle access is a key factor in achieving good performance and a successfully functioning Centre.
4. Many of the older, smaller Centres have limited capacity for on site servicing yet are required to provide it.
5. Employee and commuter parking is taking up kerbside parks in residential areas.
6. The inappropriate location of site access has the potential to affect road safety and disrupt main street functions.
7. The design, layout and location of parking areas and spaces has a direct impact on the safety and amenity values of the immediate environment.
8. Accessible and well located parking is a key factor in achieving good performance and a successfully functioning Centre.
9. In Centres where increased development is anticipated parking, access and servicing need to be designed to contribute positively to the design and function of the Centre.

A key component of the Plan is ‘accessibility’ which promotes sustainable management through well organised and functioning Centres. At the citywide level, Wellington City Council has prepared a Transport Strategy (2006) that outlines principles relating to being integrated, accessible, efficient, affordable, safe and sustainable.

The Strategy identifies a number of areas for possible change or further investigation and review; for example, in relation to road safety, cycle safety, parking policies and bus priority measures.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act’s purpose
Enabling – social wellbeing	Ease of movement to, within and around Centres will enable people to provide for their social, economic and cultural wellbeing in a safe and efficient manner.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	

Enabling – health and safety	<p>Expenditure on roading is a significant cost to the city, so ensuring land use activities are geared toward maintaining an efficient and sustainable transport network will provide for the city’s economic wellbeing as well as health and safety.</p> <p>Due to the number and spread of Centres throughout the city, it is important to ensure that transport issues are managed to promote connectivity.</p>
Sustaining the potential of natural and physical resources	<p>Promoting efficient access is a way of sustaining the potential of resources, including the roading network, the life-supporting capacity of specified resources, such as air, while also minimising adverse environmental effects, such as emissions of carbon monoxide and noise from traffic.</p>
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Transport and access make a significant contribution to the functioning of a city, the efficiency with which things can get done and directly affect peoples health and safety. The proposed objective relates directly to these issues and addresses the underlying issue of sustainability and maintaining a compact urban form. The growth framework in the Wellington Regional Strategy considers transport and spatial (or urban) form ‘*Spatial form refers to the way road and rail is located; how our ports (airports and seaport), Centres and neighbourhoods are linked to the transport systems; and our range of housing and workplaces and where they are located. It also refers to the quality of our local areas, and how easy it is to walk, cycle or use public transport locally.*’ The RPS also recognizes the importance of integrated transportation links and states that ‘*a compact and well designed regional form enhances the quality of life for residents as it is easier to get around, allows for a greater choice of housing, close to where people work or to public transport, town centres are vibrant, safe and cohesive and business activity is enhanced*’. The RPS recognises that through transport management ‘*energy consumption and carbon emission are also reduced and that communities and businesses are more resilient to oil shortages or crisis, and there is reduced pressure for new infrastructure and more efficient use of existing infrastructure*’.

Local level policies, Centres Policy and Urban Development Strategy, are in line with promoting a sustainable urban form through appropriate transport networks and links.

Without this objective significant adverse effects on the efficiency of the transport network could adversely affect the city’s sustainability, economy, people’s social wellbeing and health with emissions and noise effects.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

The objective relates directly to the issues and implementation. It seeks to address the significant aspect of sustainability in the transport network.

- **Would achieving the objective make a substantial difference in terms of resolving the issues?**

Yes, the issues relate to access, efficiency and the ability for the transport network to cope with anticipated growth and development. The objective to maintain a sustainable transport network will effectively deal with these issues.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(b) the efficient use and development of natural and physical resources; 7(c) the maintenance and enhancement of amenity values; and 7(f) the maintenance and enhancement of the quality of the environment.

Access for moving people and goods is an important part of any functional city. On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.6 To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.

Signs are a prominent part of any cityscape. They can come and go in quick succession or have a long standing presence in the environment. Signs that detract from the appearance of Centres are reasonably common, therefore the scale, illumination, motion and placement of signs are all matters that need to be managed to avoid adverse effects.

The Council considers it important to control signs and advertisements. If there is no control over size, design and siting, they may create adverse effects to the amenity, character and appearance of buildings and streets and add clutter and visual confusion to the street scene.

How the effects of signage are managed is a key issue in respect of the quality of the built environment, and the quality of living environments. Feedback from the Council's consent team and monitoring indicates that the current sign rules have had mixed results in controlling the effects of signs in Centres, especially when dealing with third party (billboard) signage. It is considered that better outcomes could be achieved if the sign standards (detailing aspects such as sign size) were more tailored to a suburban setting than currently permitted in the operative District Plan provisions. With this in mind, the size of permitted signs has been lowered, but no restrictions have been placed on the number of signs permitted.

Given the varied nature of activities in Centres and their differing signage requirements, it is considered that these revised standards are reasonable and provide flexibility for business owners. However, in providing this flexibility, Council wishes to ensure that this flexibility is not abused. Council does not accept that making provision for multiple signs should be used as an argument to enable larger, more intrusive signage. Council will not apply a permitted baseline assessment (i.e. a comparison of the proposed sign against a hypothetical signage scenario that complies with the signage standards outlined in the Plan).

This is particularly relevant when assessing third party (billboard) signage. Third party signage is often larger and more visually dominant than signage associated with a specific activity. Third party signage has therefore been restricted to ensure that it does not detract from the streetscape values and other special characteristics of Centres.

Limiting the size and type of signs will help maintain the appearance of Centres and nearby Residential Areas by ensuring that individual signs are not a dominant element of the townscape and that a cluttered sign environment will not result. Temporary signs are permitted because of their short term duration and that they have no lasting environmental effects.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Signs are a way of conveying information and marketing products. They play an important part of people's social, economic and cultural activities, and can contribute to people's health and safety. In some situations signs need to be designed and constructed to ensure they do not cause problems with public safety or visual clutter in the streetscape.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Ensuring signage is well integrated with the receiving environment helps to avoid, remedy and mitigate adverse effects, such as effects on the visual amenity of the host environment or the adjacent residential areas. Signs that are well integrated with the host building or site are less likely to compromise the visual quality of the surrounding environment.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Monitoring identified that signs in many Centres were detracting from their appearance, even if the signs were compliant with current rules. If signs were installed to their permitted levels, there would be significant adverse effects generated. Accordingly, without a more focused objective signs will continue to detract from Centres.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the proposed objective identifies signs are detracting from the appearance and amenity values in Centres and signals that signage needs to be more sensitive and better integrated with the built environment.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

It is considered that a more focused objective will make a difference in resolving the issue.

This objective enables signs to positively contribute to the city environment. In doing so, the objective is consistent with sections 7(c) and 7(f) of the Act in the way it seeks

to maintain and enhance amenity values and the associated quality of the environment.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.7 To ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated.

Subdivision provides the structure and long term layout for future development; whether in the form of lots of land or the unit titling of a building. This objective is carried over from the existing Plan with no changes in recognition that managing subdivision in the Centres continues to be a necessary method of ‘maintaining and enhancing the quality of the built environment’.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act’s purpose
Enabling – social wellbeing	Ensuring that people have the necessary services and infrastructure to provide for their social and cultural wellbeing, and health and safety is an important part of achieving appropriate subdivision design. Enabling subdivision also helps people to provide for their economic wellbeing, for example, in adapting to a dynamic city environment where changes in land ownership and land uses occur frequently.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	The land use effects associated with subdivision need to be managed to ensure the natural and physical resources (i.e. land and infrastructure) are sustained and to ensuring the life-supporting capacity of specified resources are safeguarded (such as soil, vegetation and water). Avoiding, remedying and mitigating adverse effects of subdivision on the environment also enables people to provide for their health and safety (e.g. adequate stormwater and sewerage connection, and water supply). The layout of new ‘green field’ subdivisions can also determine the efficiency of the local and wider transport network, and the compatibility with existing public transport networks.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

• **What would happen without this objective?**

The land use effects associated with subdivision need to be managed to ensure the natural and physical resources are sustained and to ensuring the life-supporting

capacity of specified resources are safeguarded. This objective allows Council to assess resource consent applications for subdivision and require that the adverse effects of new subdivisions are avoided, remedied or mitigated.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the proposed objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from poorly designed subdivision developments.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, the proposed objective focuses on ensuring that the potential adverse land use effects that can arise from poorly designed subdivision developments can be avoided, remedied or mitigated.

This objective is consistent with the purpose of the Act, which specifically seeks to avoid, remedy or mitigate any adverse effects of activities on the environment (s5(c)). Territorial authorities are responsible for the prevention or mitigation of any adverse effects of the subdivision of land (s31(1)(b)(ia)).

Objectives 1-3 of Chapter 14 in the Operative Regional Policy Statement relate to the built environment and transportation, and subdivision patterns can be seen as a key aspect of that objective. Regard was also given to Objective 21 of the Proposed RPS which states that where development is proposed to be located beyond urban areas then the development should reinforce the region's existing urban form. Again, the way subdivision is managed will help to ensure that the existing urban form can be maintained.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.8 To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

The objective responds to a key issue identified in section 1.6.2 of the Plan which is to 'reduce risk' from both natural hazards (flood, earthquake etc) and technological hazards (such as electromagnetic radiation). Wellington experiences earthquake activity and other natural hazards, including flooding and landslips. This requires measures to reduce risks to acceptable levels.

Natural and technological hazards can create havoc on every day life through damaging property, infrastructure (including critical facilities), as well as causing loss of life and limb. Such phenomena can also result in substantial pollution of the physical environment, for example, through contamination of water resources.

One particular natural hazard risk for the Centres is the Wellington Hazard (fault line) area which runs through much of Thorndon, along with parts of some other Centres, have been identified as being within the ground shaking hazard areas. Flooding problems also exist in the Porirua Stream catchment. In addition, Council is monitoring the possible risks for the City associated with climate change and sea level rise.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	This objective helps to maintain people's economic, social and cultural wellbeing in times of hazardous events through avoiding undue loss of life and possessions. Avoiding or mitigating adverse effects from natural or technological hazards on people, property and the environment provides for people's health and safety.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Natural and technological hazards pose a threat to people, property and the environment. Avoiding and mitigating the adverse effects of these hazards avoids undue environmental degradation during hazardous events, and contributes to sustaining the potential of natural and physical resources (including buildings) and safeguarding the life supporting capacity of specified resources (such as water) during such events.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Land use and placement of buildings need to be managed to ensure that there is not undue loss of life and possessions in times of hazardous events. Avoiding or mitigating adverse effects from natural or technological hazards on people, property and the environment provides for people's health and safety and helps to maintain people's economic, social and cultural wellbeing.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from inappropriately located developments.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The objective is consistent with the territorial authority's function to avoid or mitigate natural hazards (s31(1)(b(i))). It is an appropriate way to protect people, property and the natural environment.

Most council strategies and policy documents seek to achieve a safer community, and this includes maintaining appropriate emergency management procedures (eg. the Environment, Transport and Urban Development Strategies; 2006, and draft Long Term Council Community Plan, 2006/07-2015/16).

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.9 To prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal.

Hazardous substances pose a significant risk to human health and the natural environment. This objective seeks to reduce this risk.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Storage, use, disposal, or transportation of hazardous substances is part of the day to day activities of some of the Centres. This objective enables people to make use of hazardous substances in providing for their social, economic and cultural wellbeing, on the basis that every care is taken to prevent or mitigate any adverse effects.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Hazardous substances pose a threat to people and the environment. Preventing or mitigating the adverse effects of hazardous substances avoids environmental degradation, and contributes to sustaining the potential of natural and physical resources and safeguarding the life supporting capacity of specified resources (including air, water and soil).
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

• ***What would happen without this objective?***

Land use and placement of buildings or structures that store or accommodate hazardous substances need to be managed to ensure that there is not exposure to humans, or result in loss of life and possessions, or environmental degradation. Avoiding or mitigating adverse effects from exposure to hazardous substances avoids undue risk to people, property and the environment, and contributes to sustaining the potential of natural and physical resources and safeguarding the life supporting capacity of specified resources (including air, water and soil).

• ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from inappropriately located developments.

• ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The objective is consistent with territorial authorities' function to prevent or mitigate any adverse effects of the storage, use, disposal or transportation of hazardous substances (s31(1)(b)(ii) and (b)(iia)).

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

6.2.10 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.

Tangata whenua with ancestral relationships with Wellington city have an important resource management role in the district. Maori concepts present a different view for the management of the City's natural and physical resources. In particular, kaitiakitanga is a specific concept of resource management. By acknowledging ancestral relationships with the land and natural world, a basis can be constructed for addressing modern forms of cultural activities.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Enabling the exercise of tino rangatiratanga – or Maori sovereignty – helps to ensure that tangata whenua provide for their communities social, cultural and economic wellbeing, for example in the way natural and physical resources are managed. Enabling kaitiakitanga provides for tangata whenua to actively provide guardianship over natural and physical resources.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Enabling the exercise of kaitiakitanga or guardianship helps to ensure that any adverse effects on the cultural conditions associated with the environment (including amenity values, natural and physical resources and ecosystems) are avoided, remedied or mitigated. Exercising kaitiakitanga contributes to sustaining the potential of natural and physical resources, and where relevant safeguarding the life-supporting capacity of specified resources.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

• ***What would happen without this objective?***

Some of the principles of the RMA direct decision makers to think about Maori values, practices and interests. Decision makers must:

- recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (Section 6e)
- have particular regard to kaitiakitanga (Section 7a)
- take into account the principles of the Treaty of Waitangi (Section 8).

Without this objective, there would be inadequate policy direction for users of the Plan and decision makers to have particular regard for kaitiakitanga obligations of tangata whenua. Kaitiakitanga is defined in the RMA as meaning 'the exercise of

guardianship by the tangata whenua of an area in accordance with tikanga Maori in relation to natural and physical resources; and includes the ethic of stewardship'

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective relates directly to facilitating and enabling Wellington's tangata whenua and other Maori to the exercise of tino rangatiratanga and kaitiakitanga when managing natural and physical resources.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The principles of the Treaty include, amongst other things, the duty to provide information in a timely manner, and to maintain an open mind in decision making.

An important part of any relationship of tangata whenua with ancestral areas is tino rangatiratanga or Maori sovereignty. Although tino rangatiratanga naturally links back to the people with manawhenua over the area or rohe, there is also a role for other Maori to maintain their cultural wellbeing, for example, in establishing and operating kohanga reo.

In recognising these matters, this objective is **appropriate** for achieving the purpose of the Act.

Part D Appropriateness of policies, methods and rules for Centres

The evaluations in the following sections consider the extent to which the proposed policies, methods and rules for the Centres zone are the most appropriate for achieving the District Plan’s objectives.

The appropriateness of existing provisions was considered at the time of being included in the ‘first generation’ District Plan (in 1994). Implementation and monitoring of the District Plan has not indicated any notable deficiencies with these provisions. Therefore, any existing provisions that are not proposed to be changed will not be re-evaluated.

The District Plan has adopted a rule-based regime for implementing policies, based on compliance with environmental standards. This approach has been thoroughly considered though the plan preparation, submission and hearing process when the operative District Plan was originally notified. It has operated for over 10 years relatively successfully so it is not proposed to reconsider the merits of this approach.

Section 32 of the Act requires the appropriateness of the proposed policies, methods or rules to be examined in terms of achieving the objectives of the District Plan. In examining the policies and methods, regard should be had to their effectiveness and efficiency. The benefits, costs and relevant risks associated with the provisions are also examined.

For your guidance – structure of Part D:

1. **The following analysis of provisions is structured around each objective** (which is highlighted in a grey shaded box at the beginning of each section). The numbering of the objectives reflects the numbering in Proposed District Plan Change 73.
2. The set of policies and methods proposed to achieve each objective is listed in a white box under the objective at the beginning of each section.
3. An analysis of each group of policies and methods proposed to achieve the relevant objective follows on under each objective.

7. *Role and function of Centres*

6.2.1 To provide a network of accessible and appropriately serviced Centres throughout the City that are capable of providing goods, services and facilities to meet the day to day needs of local communities, residents and businesses, and of accommodating anticipated population growth and associated development whilst maintaining Wellington’s compact urban form.

7.1 Proposed Policies and Methods

6.2.1.1 Maintain an efficient and sustainable network distribution of centres, as identified below:...

6.2.1.2 Allow for the establishment of new centres or the outward expansion of exiting Centres when they are required to

accommodate growth and where they:

- **avoid significant adverse distributional effects that may result from attracting people from an established centre into a new or expanded Centre, especially effects upon the role and function of existing centres; and**
- **are compatible with adjoining landuses; and**
- **improve access to goods and services, reduce congestion on the road networks; and**
- **are accessible by a variety of transport modes including public transport, walking and cycling; and**
- **do not generate more than minor adverse effects on the roading network and the hierarchy of roads (Maps 33 and 34) from potential trip patterns, travel demand or vehicle use; and**
- **do not undermine existing investment in infrastructure (including water, stormwater, sanitary sewer, roads, footpaths, community facilities, street furniture, and parking) needed to safeguard the viability of any existing Centre.**

6.2.1.3 Promote the viability and vibrancy of Regionally Significant Centres in the Wellington region.

6.2.1.4 Promote the intensification of activities and buildings in and around Centres.

6.2.1.5 Provide for the comprehensive development and redevelopment of key centres through a concept, master or structure plan process, as included in Appendix 1.

METHODS

- Rules
- Planning maps
- Operational activities (management of infrastructure including through the Centres Policy 2008 and Long Term Council Community Plan)
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)
- Centres Policy
- Master, Structure and Concept Plans
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)
- Northern Growth Management Framework
- Advocacy
- Memorandums of Understanding with land owners
- Plan Changes
- Annual Plan

7.2 Background

Through monitoring and research carried out as part of the Suburban Centres review, 'Centres' have been recognised as an important physical resource providing for the economic and social wellbeing of local communities, and are part of the what makes a successful economy for the city as a whole. The importance of maintaining a

sustainable network distribution of Centres is also outlined in the Centres Policy 2008, and the Urban Development Strategy, 2006. Both these documents consider how and where the city will grow to accommodate an increasing population whilst maintaining a compact urban form to ensure sustainability. The District Plan is expected to provide a regulatory framework around this direction, and the management of Centres is an important part of that.

In promoting a sustainable city, it is important to recognise and provide for the contribution that Centres make. The Plan aims to achieve this by drawing on one of Wellington's key strengths, its compactness. The Plan aims to retain a compact city and deliver a sustainable land use pattern by providing a network of accessible and appropriately located and serviced centres capable of meeting local day to day needs and of accommodating population growth and associated development. Each Centre performs a role and function reflecting its location, population catchment, size and historical development pattern. Centres provide accessible shopping and local services that meet people's day-to-day needs. Generally, the larger the Centre, the greater the range of activities and functions.

The operative District Plan (notified 1994) allowed the market to dictate what areas of the city were used for retail, commercial, business and industrial activities. This has allowed areas to change and respond to market demands, but has also led to a decline in some Centres which struggle to meet the day to day needs of local people and communities. When a Centre becomes dilapidated, this threatens the significant investments in infrastructure that have been made by business, developers and Council over many decades. It also means that local needs are not met, and that people have to travel further to satisfy their daily needs. It is more sustainable to have those needs met 'locally' so people don't have to travel so far.

The need for Centres to be protected through a policy framework has been keenly scrutinised throughout the Suburban Centres review. Submitters considered that the *draft* Plan Change contained more protectionist policies than were considered necessary. In response, Officers have assessed the physical attributes of each Centre, including the potential likelihood of substantial redevelopment and determined that the potential risk to the viability and vitality to the City's Centres was not as great as previously considered. The result is that the policies have been redrafted to be future-proof and more enabling in their intent. At the same time the policies will still continue to recognise the importance of the role and function of Centres in resource management terms.

7.3 Centres hierarchy

Policy 6.2.1.1 introduces a network distribution of Centres in order to identify the role and function of each centre and provide a spatial framework for integrated planning. This hierarchy supports the Wellington Regional Strategy and Proposed Regional Policy Statement for the Wellington region which identifies the CBD as the key regional centre, and Johnsonville and Kilbirnie as two of eight sub-regional centres. Based on the centres hierarchy, and other factors such as geographical catchments for centres, topography, communities of interest, social and political boundaries, and transport and infrastructure networks, the Centres Policy identifies 11 planning areas which will be used by Council to provide a context for centre development and integrated planning.

The Centres hierarchy is a resource management tool to guide development in a way that will maintain and strengthen the role of the City's Centres and ensure the spatial planning strategy of the growth spine, and the roles and functions of Centres, remain

compatible and deliver a sustainable land use pattern. Policy 6.2.1.1 has incorporated some of the key elements of the Council's Centres Policy, and has identified each centre as a Sub-Regional, Town, District or Neighbourhood Centre. In a change from the approach set out in the Centres Policy, however, Adelaide Road has been reclassified as a Centre (Mt.Cook). This will assist in achieving the objectives of the Adelaide Road Framework, recognises the mix of uses anticipated by the Framework, and will help provide a heart to the existing Mt.Cook community.

The proposed policies will promote Centres as places where more intensive development should occur in order to promote a compact urban form and deliver a sustainable growth pattern.

7.4 Methods

Rules and standards are the most effective way of influencing and managing the location of land use activities and the effects they generate. In particular, provisions (such as site-specific height standards) have been specifically developed to facilitate more intensive development and activities in key Centres.

The District Plan objectives and policies are directly in line with other Council policy directions, and so other Council activities through the Long Term Council Community Plan, Transport and Infrastructure Delivery Projects under the Urban Development Strategy and integrated planning under the Centres Policy will all assist in implementing the proposed District Plan Centres zone policies. This approach to land use management has been well tested in the operative District Plan and has been found to be effective and efficient.

7.5 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 1: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Centres			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the current market-orientated District Plan provisions in relation to suburban centres.</i> This option is not recommended.</p>	<p>Encourages a wide range of activities to occur throughout the city and enables the city to respond to changing market demands.</p>	<p>Low implementation costs.</p>	<p>The activities are able to occur both within and in out-of-centre locations, thus threatening the sustainable management and viability of centres through inadequate consideration of their effects.</p> <p>Employment land will not be protected and will continue to be lost to other more valuable land uses, exacerbating current and forecast employment land shortages. Employment land provides important jobs and services needed for an efficient and effective city.</p>
<p>Option 2 – new provisions as proposed in the draft suburban centres plan change <ul style="list-style-type: none"> Identify ‘Centres’ in a separate sub-zone and introduce provisions that guide development </p>	<p>The Centres hierarchy would be fairly strictly followed, thus the Centres Policy implemented.</p> <p>This option would involve a high level of land use regulation, with rules identifying what activities could occur in each of the centres in the hierarchy.</p>	<p>This direction would be in line with the Regional Policy Statement, Urban Development Strategy and Centres Policy.</p> <p>There would be a high level of direction over the location of land uses thus making it easy for Council to plan appropriate levels of infrastructure to support centres.</p> <p>A compact urban form is a sustainable option in promoting development options</p>	<p>Costly to implement due to the high regulatory nature of the provisions relating to high use of land use controls and the appropriateness of activities for each centre type in the centres hierarchy.</p> <p>Likely to encounter interpretational difficulties over the introduction of definitions.</p> <p>There would be little or no room for the</p>

Table 1: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Centres			
Option	Key Features	Advantages	Costs and Risks
<p><i>as appropriate to a place in the Centres hierarchy.</i></p> <ul style="list-style-type: none"> • <i>Recognise the importance of Centres to the economy and the communities they serve and the significant investment in infrastructure that underpins them.</i> • <i>Provide for the redevelopment of Centres identified through the UDS and Centres Policy as needing to accommodate population growth.</i> <p>This option is not recommended.</p>	<p>The introduction of many definitions used to categorise different land use activities.</p> <p>Managing the city’s infrastructure is recognised as being key to sustainable management.</p> <p>Key Centres identified in the Urban Development Strategy would be recognised for redevelopment in order to accommodate population growth.</p> <p>A compact urban form would be promoted.</p>	<p>for the City.</p>	<p>market to play a role in determining the appropriate location of different scale activities.</p> <p>Unpalatable to the development community and land owners who opposed these relatively tight provisions proposed in the <i>draft</i> plan change. Costly appeals would therefore likely follow District Plan hearings.</p>
<p>Option 3 – proposed new provisions</p> <ul style="list-style-type: none"> • <i>Identify ‘Centres’ in</i> 	<p>This option would focus on promoting the spatial form benefits of the Centres Hierarchy whilst promoting</p>	<p>Intensification within existing Centres will allow efficient use of existing infrastructure, support existing services and facilities, and allow people to live close to jobs and close to</p>	<p>There may be some disparity with market direction for land use activities and maintaining the sustainable urban form promoted by the centres hierarchy.</p>

Table 1: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Centres			
Option	Key Features	Advantages	Costs and Risks
<p><i>a separate zone and introduce provisions that recognise the importance of Centres to the economy and the communities they serve and the significant investment in infrastructure that underpins them.</i></p> <ul style="list-style-type: none"> • <i>Allow for the expansion of existing Centres and the creation of new Centres so long as any new Centre is shown to be a sustainable option through meeting a set of criteria.</i> • <i>Allow for redevelopment of Centres identified through the UDS and Centres Policy as needing to</i> 	<p>a low level of land use regulation.</p> <p>Key Centres identified in the Urban Development Strategy would be recognised for intensification and redevelopment in order to accommodate population growth.</p> <p>Managing the City’s infrastructure is recognised as being key to sustainable management.</p> <p>A compact urban form would be promoted.</p>	<p>public transport.</p> <p>A compact urban form will be promoted which is in line with the Regional Policy Statement, Urban Development Strategy and Centres Policy.</p> <p>There would be a low level of direction over the location of specific land uses, so long as the sustainability of the centres network (and thus compact urban form) is maintained, allowing for the market to play its role in identifying where activities should locate.</p> <p>Concept, master and structure planning will provide for the comprehensive redevelopment of key Centres involving infrastructure teams from council as well as key stakeholders in the community. These plans will better enable key Centres to re-develop and provide for population growth.</p> <p>Low implementation costs due to low levels of land use regulation.</p>	<p>Controlling effect of proposes new centres on existing centres will be difficult where new centres could erode vitality and vibrancy of existing centres.</p> <p>Producing concept, master or structure plans can be costly to Council and costly to implement.</p>

Table 1: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Centres			
Option	Key Features	Advantages	Costs and Risks
<i>accommodate population growth.</i> This option is recommended.			

7.6 Background documents

- District Plan Change 52
- District Plan Change 66
- Urban Development Strategy 2006
- Centres Policy 2008
- Long Term Council Community Plan
- Wellington Regional Strategy
- Greater Wellington Operative Regional Policy Statement
- Proposed Regional Policy Statement for the Wellington Region

8. Activities

6.2.2 To facilitate vibrant and viable Centres through enabling a wide range of appropriate activities to occur to meet the economic and social needs of the community, whilst avoiding, remedying or mitigating adverse effects that may arise from activities.

8.1 Proposed Policies and Methods

6.2.2.1 Enable and facilitate a wide mix of activities within Centres provided that character and amenity standards are maintained and adverse effects are satisfactorily avoided, remedied or mitigated.

6.2.2.2 Manage the location and scale of large integrated retail developments exceeding 20,000m² gross floor area, to ensure they will not result in significant cumulative adverse impacts on:

- the viability and vitality of the Golden Mile; and
- the range of services available to visitors and any resulting loss of economic activity to Wellington; and
- the sustainability of the transport network; and
- the roading network and the hierarchy of roads (see Map 33) from trip patterns, travel demand or vehicle use.

6.2.2.3 Provide for temporary activities that contribute to the vitality and viability of a Centre whilst controlling any adverse effects in a manner that acknowledges their infrequent nature and limited duration.

6.2.2.4 Control the adverse effects of noise within all Centres.

6.2.2.5 Ensure that appropriate on-site measures are taken to protect noise sensitive activities within Centres from intrusive noise effects of other permitted or existing activities.

6.2.2.6 Ensure that residential activities do not constrain the activities of established and permitted activities through reverse sensitivity to noise.

6.2.2.7 Ensure that activities creating effects of lighting, dust and the discharge of any contaminants are managed to avoid, remedy or mitigate adverse effects on other activities within Centres or in nearby Residential or Open Space Areas.

6.2.2.8 Avoid adverse effects from activities listed under the Third Schedule of the Health Act.

METHODS

- Rules
- Centres Policy
- Design Guides
- Planning Maps

- WCC operational activities (Urban Development Strategy, Economic Development Strategy (2006), Transport Strategy, Public Space Centres Development Programme)
- Other mechanisms (the Wellington Regional Strategy, the Proposed Regional Policy Statement for the Wellington Region 2009, Regional Air Quality Plan, abatement notices, enforcement orders)
- WRC operational activities for the proposed Takapu Island park and ride facility
- New Zealand Transport Agency operational activities as a road controlling authority
- Section 16 of the Act (Duty to avoid unreasonable noise)
- Local Government Act
- Other mechanisms
- Application of the New Zealand Acoustic Assessment and Measurement Standards

8.2 Background

Centres are the focus of economic and social life in our communities. They have multiple functions and activities, but their core is typically retail and local services. It is the combination of activities and functions that makes Centres particularly important places, as it enables them to deliver a range of environmental, social, economic and cultural benefits.

To ensure that Centres are competitive and vibrant places that people will want to invest their money in, there will be few limits on the types of activities that may establish within Centres. Where standards have been set for activities and developments, it is generally to ensure a reasonable level of amenity value is maintained. In such cases where resource consent is required, applications will be assessed for their appropriateness and the ability for any adverse effects to be avoided, remedied or mitigated, including reverse sensitivity effects.

A potential threat to the viability and vitality of Centres is the increasing pressure for larger scale supermarkets, large format retailing and other shopping destinations to locate in areas outside of Centres. This is of particular concern given that Wellington's Centres represent a considerable investment in infrastructure, commercial and community services and facilities, and the street and landscape improvements they may contain. In the context of sustainable management these existing commercial Centres are a valuable physical resource and it is for this reason Council will seek to ensure the viability and vitality of established Centres are not undermined by inappropriately located out-of-centre retail activities.

As a major shopping area, the Central Area has the largest concentration of retail in the region and is dominant in comparison goods, fashion and speciality shopping. The Golden Mile is of particular importance to the City, and is viewed by many as Wellington's 'outdoor mall'. The importance of the Central Area to the economic and social health of the whole region is recognised in the Wellington Regional Strategy and in the Proposed Regional Policy Statement. Council's policy is therefore to maintain and strengthen the Central Area, and to ensure that it retains its primacy as an employment and retail centre. The significant retail offer on the Golden Mile and the high quality of its public spaces is critical to maintaining the international competitiveness of Wellington and achieving sustainable development outcomes.

Council is generally supportive of new large-scale retail activities and integrated retail developments locating within Centres provided the development is of a scale appropriate to the role and function of the Centre. Because of this, if a very large

integrated retail development, 20,000m² in floor area or more, is proposed within Centres, Council will consider the impact on the viability and vitality of the Golden Mile.

8.3 Managing Effects from Activities

Research and monitoring in the Suburban Centres review has identified that retail and residential issues need to be managed. Additionally, effects from noise, lighting, dust, traffic movement, and the discharge of contaminants also need to be managed and effects from incompatible activities need to be avoided. Incompatible activities are identified in the rules as quarries, clean fills and activities requiring a licence under the Third Schedule of the Health Act.

There are some activities in Centres that present noise issues for residential activities, and vice versa. As activities can be incompatible, rules and standards can require noise sensitive activities to protect themselves against other existing and permitted land uses. This approach has been adopted into the Central Area with good effect, and the same provisions are proposed to be introduced in the Business 1 Area.

Temporary activities, such as outdoor concerts, parades, sporting events and cultural festivals, make an important contribution to the vibrancy and vitality of Wellington City as a whole. Unlike other key chapters of the Plan such as Central Area, temporary activities in the former Suburban Centres zoning are required to comply with all activity standards, which generally gives rise to the need for a resource consent due to temporary activities struggling to comply with the noise standards.

In the Residential, Rural and Open Space zones temporary activities are not subject to the noise standards. Instead the potential adverse effects of temporary activities are managed using section 16 of the Act (duty to avoid unreasonable noise) and section 17 (duty to avoid, remedy or mitigate adverse effects). It would be more efficient if similar provisions also applied to temporary activities in Centres.

8.4 Methods

Rules and standards are the most effective way of controlling land use activities and the effects they generate. This approach has been well tested in the operative District Plan and has been found to be effective and efficient.

8.5 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 2: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the current District Plan provisions in relation to land use controls. These include District Plan Change 52, which introduced the need for resource consent for retail activities 500m² or more in floor area.</i></p> <p>This option is not recommended.</p>	<p>Encourages a wide range of activities to occur throughout the city and enables the city to respond to changing market demands.</p> <p>Controls the establishment of large format retail activities and the potential effects they might have on Sub-Regional, Town and District Centres.</p>	<p>Low implementation costs due to low regulatory nature of the provisions.</p> <p>Provides control of proposed larger retail activities and assessment criteria aimed at supporting a compact urban form and sustainability of existing Centres.</p>	<p>Activities are able to occur both within and in out of centre locations, thus threatening the sustainable management and viability of Centres.</p> <p>Loss of industrial land where residential and retail activities have been allowed to establish in traditional industrial areas.</p> <p>These provisions do not sufficiently promote the intensification of activities in Centres, and are therefore not particularly conducive to achieving the Urban Development Strategy; and are not wholly in keeping with the Proposed Regional Policy Statement or the Wellington Regional Strategy.</p>
<p>Option 2 – new provisions as proposed in the draft suburban Centres plan change <ul style="list-style-type: none"> • Allow a broad </p>	<p>A broad range of appropriate activities would be allowed however there would be a high degree of control over retail activities.</p>	<p>Allows a broad range of activities, apart from controls over retailing. The degree of regulation is moderate.</p> <p>Adverse effects of permitted activities in Centres are managed, and effects from</p>	<p>Having several categories of retail activities could lead to interpretational issues with definitions, making plan provisions difficult and inefficient to implement and potentially increasing the number of resource consents to be processed.</p>

Table 2: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<p><i>range of activities though tightly manage retail activities so that in each Centre they are of an appropriate size and scale relative to the Centres' place in the centres hierarchy.</i></p> <ul style="list-style-type: none"> • <i>Manage adverse effects generated by noise, lighting and other emissions.</i> • <i>Restrict activities with inappropriate adverse effects for Centres (quarries, cleanfills etc).</i> <p>This option is not recommended.</p>	<p>Standards used to control and manage adverse effects from permitted and restricted discretionary activities.</p> <p>Introduces a number of new definitions to categorise retail activities.</p>	<p>inappropriate activities avoided.</p> <p>Supports intensification of activities in Centres, in keeping with the Urban Development Strategy, Regional Policy Statement and Wellington Regional Strategy.</p>	<p>Strict controls around retailing was not well received by stakeholders, and therefore this option could be associated with a high risk of appeal.</p>
<p>Option 3 – proposed new provisions</p> <ul style="list-style-type: none"> • <i>Allow a broad range of land use activities though</i> 	<p>A broad range of activities allowed. Only very large retail mall activities managed as a Discretionary Activity.</p>	<p>Cost-effective and efficient to implement as the vast majority of activities are permitted and there is only likely to ever be one or two applications made for very large mall activities in existing Centres.</p>	<p>Centres-focused zone and rules may reduce the influence which the market has over deciding where different land uses should locate.</p>

Table 2: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<p><i>manage the potential effects from large scale retail activities of 20,000m² or more in floor area.</i></p> <ul style="list-style-type: none"> <i>Promote comprehensive development in the Mt Cook and Johnsonville Centres.</i> <i>Manage adverse effects generated by noise, lighting and other emissions.</i> <i>Restrict activities with inappropriate adverse effects for Centres (quarries, cleanfills etc),</i> <p>This option is recommended.</p>	<p>Standards used to control and manage adverse effects from permitted and restricted discretionary activities.</p> <p>Noise sensitive areas within the Airport Air Noise Boundary and Port Noise Affected Area have been identified.</p>	<p>Land use intensification promoted in Mt Cook and Johnsonville Centres in order to assist in the redevelopment of these Centres under the Adelaide Road framework and the Johnsonville Town Centre Plan.</p> <p>High correlation with the Growth Spine concept in the Urban Development Strategy, which supports sustainable development through a compact urban form by encouraging activities to locate in Centres.</p> <p>Having Centres focused zone and rules may encourage activities to locate into Centres because of economic clustering benefits and being very close to where people will be encouraged to live.</p> <p>Adverse effects of permitted activities in Centres managed and effects from inappropriate activities avoided thereby moving the costs associated with the management of adverse effects from Council to developer.</p>	

8.6 Background documents

- District Plan Change 52
- District Plan Change 66
- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008
- Urban Development Strategy 2006
- Centres Policy 2008
- Long Term Council Community Plan
- Wellington Regional Strategy
- Greater Wellington Regional Policy Statement
- Nigel Lloyd, Acousafe Consulting and Engineering Ltd, 5 January 2006, Suburban Centres Noise Provisions for Wellington City Council, N1323
- Auckland Regional Council, 16 November 2006, Ensuring Liveable Quality Apartments in the Auckland Region: Discussion of issues to be addressed in the review of the NZ Building Code

9. Built Development, Urban Form and Public Space

- 6.2.3 To ensure that activities and developments maintain and enhance the amenity values and public safety of Centres and any adjoining or nearby Residential or Open Space Areas, and that they enhance those characteristics, features and areas of Centres that contribute positivity to the City's distinctive physical character and sense of place.**

9.1 Proposed Policies and Methods

Design Guidance

6.2.3.1 Ensure that buildings, structures and spaces are designed to:

- acknowledge, respect and reinforce the form and scale of the surrounding environment in which they are located; and
- respect the context, setting and streetscape values of adjacent listed heritage items and Heritage Areas; and
- promote a strong sense of place and identity within Centres; and
- establish positive visual effects; and
- provide good quality living and working environments; and
- integrate environmental sustainability principles; and
- provide conditions of safety and accessibility, including for people with restricted mobility.

6.2.3.2 Encourage developments to create an attractive, comfortable and legible street environment including aspects such as shelter/ verandahs, lighting, street furniture and landscaping in Centres.

6.2.3.3 Maintain or enhance the street edge and an appropriate activity mix along identified primary and secondary street frontages.

6.2.3.4 Maintain and enhance the streetscape by controlling the appearance of and/or limiting the creation of vacant land, or open land and ground level parking areas on identified primary and secondary streets frontages.

6.2.3.5 Maintain and enhance the streetscape by controlling the siting and design of structures on or over roads.

Residential developments

6.2.3.6 Enable residential development in all Centres, where it:

- utilises upper floors of buildings; and
- maintains an active ground-floor on any primary street frontages, (except for in Neighbourhood Centres); and
- in the Mt Cook is located above the second floor (measured from street level) on streets with a frontage to Adelaide Road or John Street and located above ground floor (measured above street level) on all other primary and

secondary street frontages;

6.2.3.7 Enhance the quality and amenity of buildings incorporating a residential component by guiding their design to ensure current and future occupants have an adequate standard of amenity and access to daylight and an awareness of the outside environment.

Zone interfaces

6.2.3.8 Ensure an appropriate transition between activities and buildings within the Centres zone and adjoining Residential and Open Space Areas.

Building height, bulk and location

6.2.3.9 Manage the height, bulk and location of buildings and developments so that they avoid, remedy or mitigate the adverse effects of shading, loss of daylight, privacy, scale and dominance and any other adverse effects on amenity values within Centres and on adjoining Residential and Open Space Areas.

6.2.3.10 Ensure that new buildings higher than three storeys are designed to avoid, remedy or mitigate any wind problems that they create and where existing wind conditions are dangerous, ensure new development improves the wind environment as far as reasonably practical.

6.2.3.11 Ensure that the cumulative effect of new buildings and building additions or alterations higher than three storeys do not progressively degrade the pedestrian wind environment.

6.2.3.12 Encourage the use of wind mitigation measures for buildings higher than three storeys during the early stages of building design and ensure that such measures are contained within the development site.

Health, safety and security

6.2.3.13 Ensure that all spaces accessed by the public are safe and are designed to minimise the opportunities for crime.

METHODS

- Rules
- Design Guides (Centres Design Guide, Guidelines for Design Against Crime)
- Centres Plans
- Advocacy (National Guidelines for Crime Prevention Through Environmental Design in NZ)
- Operational activities (City safety initiatives)
- Implementing the Urban Development Strategy, 2006
- Footpath Management Policy

9.2 Background – Urban Design

Research and monitoring for the Suburban Centres review identified significant urban design issues. Feedback from the public and stakeholders also confirmed a

public appetite to deal with these issues, with many people being indicating that they would like to see improved appearance and quality of buildings in Centres.

As the Council is a signatory to the New Zealand Urban Design Protocol there is an obligation to aim towards high quality urban design in all aspects of the urban environment. Council's Urban Development Strategy identifies that improving the urban environment is critical to the vitality and viability of areas and the economic future of the City.

At present, only multi-unit residential developments of three units or more, and development in the Thorndon and Newtown Centres are covered by urban design guidance. District Plan Change 52 introduced urban design criteria for larger buildings over 500m² in area, however the effectiveness of these new provisions is limited and do not address the various urban design issues identified in the monitoring.

The District Plan currently contains three design guides that apply to Suburban Centres areas. These are:

- Newtown Suburban Centres Character Area Design Guide
- Shelly Bay Suburban Centres Character Area Design Guide
- Thorndon Character Area Design Guide

These have been reasonably effective in the locations where they operate, but urban design issues exist throughout the Centres, not just in these three locations.

9.3 Intensifying development and height limits

Part of Councils strategic policy direction is to intensify development in Centres as a sustainable option to meeting the demands from forecast population growth. Implementing concept, master or structure plans designed to redevelop key Sub-Regional and other Centres is one of the tools proposed to be used to achieve this. Intensive development has the potential to create increased impacts on amenity values such as loss of daylight and sunlight, increased wind conditions and visual dominance of buildings. It is for these reasons; Council seeks to manage these effects through the design process.

To facilitate more intensive development and activities in the key Centres of Johnsonville, Kilbirnie and Adelaide Road, building height standards will be increased in certain areas together with the preparation of a master, concept or structure plan. Comprehensive plans have already been developed for Johnsonville and Adelaide Road, where the height standards in certain 'zones' of these Centres is proposed to increase to 18m for permitted activities, with a discretionary height limit of 24m.

At this stage, there appears to be little demand for development higher than 12m in the other Town and District Centres. In his regard, the permitted building height limit of 12m will remain, apart from in the Churton Park District Centre (which has been subject to a structure planning process) where a 9m permitted building height applies. In all of the Neighbourhood Centres (apart from Berhampore and Northland – currently zoned Suburban Centres) the maximum permitted building height will be 9m. This recognises that many of the Neighbourhood Centres are currently zoned Residential and are therefore surrounded by residential activities, which are sensitive to the potential adverse higher permitted building heights on adjoining properties.

9.4 Managing adverse effects of built development

Wind is an issue that has the potential to be exacerbated by intensifying built development and increasing permitted and discretionary height limits. It is particularly important that a comfortable pedestrian environment is maintained in the busier Town and Sub-Regional Centres. Wind effects are currently only controlled in the Central Area, although adverse wind conditions were identified in several Centres during monitoring and through research by Opus International Consultants.

Monitoring also revealed that the bulk and location rules pertaining to zone interfaces were not sufficiently adequate in maintaining the amenity values of adjoining residential properties. There have been some infill developments in Centres that have detrimentally affected adjoining residential properties in Residential Areas.

There has been a steady growth in townhouse development and low rise apartment buildings within Centres. Some of these buildings currently rely on adjacent sites (either vacant or with low height buildings) to provide suitable amenity for occupants (eg. natural light, awareness of the outside environment and sunlight access where practicable). Over time, adjacent sites may be developed, leading to a reduction in basic amenity requirements for occupants of the residential building. Maintaining reasonable levels of residential amenity in Centres is important in order to ensure residential developments are attractive to people over the long term and are able to provide a sustainable alternative to options

Design guidance and rules are included to ensure that new residential buildings in Centres are of reasonable quality and provide residential amenities on site, and that these will not be adversely affected by potential new development on adjacent sites. The environmental result will be residential buildings in Centres that provide an enduring level of residential amenity with respect to daylight and an awareness of the outside environment.

9.5 Sense of place

The Council promotes maintaining Wellington's unique sense of place through its policies. An array of qualities and characteristics contribute to people's sense of place in Centres. Diverse experiences include Wellington's compact form, interestingly designed buildings, heritage buildings, distinctive heritage areas and a range of public and open spaces. The qualities of the public environment, as well as the buildings that define it, are important contributors to people's appreciation of the pleasantness, functionality and liveability of the city.

Identification of main street frontages and having special development guidance on these streets is an important part of ensuring a strong sense of place establishes or is maintained in Centres. Many Centres have expanded in the last 20 years following the introduction of operative District Plan Suburban Centres zoning. This expansion has often gone beyond the boundaries of the identified main street frontages in the District Plan and in such cases Council has had little scope to influence design outcomes. The Suburban Centres review has identified these expanded main street functions in many Centres and also identified potential frontages that should be considered for design guidance in the future.

The design and appearance of buildings also has a direct bearing on the quality of the public environment and on the city's wider public setting and sense of place. Enhancing a sense of place and protecting those features that make Wellington special and unique are an important part of achieving a stimulating and memorable city.

Developments that positively contribute to the streetscape and public environment will be encouraged by Council as such contributions are an effective way to help build a sense of place and improve environmental quality. It may be appropriate in some cases to use these aspects of a development to off-set or balance any adverse effects from building bulk and location infringements, if they exist. However, it will not always be appropriate to do so especially where adverse effects from bulk and location infringements generate more than minor adverse effects.

9.6 Methods

Rules, design guides and implementing concept, master or structure plans are the primary ways of controlling urban design results. These methods are currently used in other chapters of the operative District Plan and are efficient and effective and generally anticipated by the development community. Other Council activities will contribute to creating improvements in the public environment, particularly street improvements.

9.7 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 3: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the current District Plan provisions in relation to land use and building controls.</i></p> <p>This option is not recommended.</p>	<p>All built development is encouraged and only those proposals breaching bulk and location standards require resource consent.</p> <p>Streets where shop front windows and verandas are required are identified.</p> <p>There is a uniform 12m height limit across the zone.</p>	<p>Low implementation costs as there are few triggers for requiring resource consent.</p>	<p>The urban design qualities of the built environment may not improve, and this in turn may detract from Wellington and its appeal to visitors and investors.</p> <p>Poorly designed buildings that do not complement or adequately consider their visual effect on neighbouring areas or public places may continue to be constructed.</p> <p>The low height standard may hinder development and redevelopment in key Sub-Regional and Town Centres, thus intensification of development in Centres may not easily occur. This option is therefore not conducive to achieving the Urban Development Strategy.</p>
<p>Option 2 – existing provisions proposed under plan change 52 <i>Buildings over 500m² in floor area require a resource consent.</i></p>	<p>Introduces the need for design guidance for larger buildings.</p>	<p>Low implementation costs as there are relatively few large building proposals that would trigger the need for resource consent and design assessment.</p>	<p>Not only larger buildings impact on the public environment and the urban design qualities of the built environment, smaller scale buildings can also adversely impact on a Centres appearance and sense of place. This coupled with potential cumulative effects from smaller developments and changes to buildings</p>

Table 3: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space			
Option	Key Features	Advantages	Costs and Risks
This option is not recommended .			<p>that can have significant adverse effects on the streetscape of Centres.</p> <p>These provisions are largely ineffective in dealing with the identified issues and will not deliver improved quality to the built environment.</p>
<p>Option 3 – proposed new provisions</p> <ul style="list-style-type: none"> • <i>Make most development, including additions and alterations, a Restricted Discretionary Activity and introduce Design Guides for assessment.</i> • <i>Make residential development a Restricted Discretionary Activity and introduce Design Guides for assessment.</i> • <i>Require noise</i> 	<p>The introduction of a Centres Design Guide for all new buildings, additions and alterations to buildings. (NB: The Residential Design Guide is to be used to assess residential development in new or converted buildings).</p> <p>Identification and design guidance for areas with special character including Newtown, Brooklyn and Kelburn Centres.</p> <p>Provision for future Heritage Area identification in Centres</p> <p>Standards will be used to</p>	<p>Design guidance will improve the quality of the built environment, from building design to site layout, making Centres more attractive and thus probably more vibrant and successful places.</p> <p>Wellington’s sense of place will be maintained and enhanced through managing the characteristics that define and Wellington’s unique identity.</p> <p>Improved residential developments will deliver higher amenity standards for residents, making them a better long term prospect for Centres.</p> <p>Additional building height in Sub-Regional Centres will promote more intensive land use and support a sustainable compact urban form.</p>	<p>This option will generate the need for more resource consents and therefore increase the costs of implementing the Plan. What constitutes good urban design is subjective and this may deter some new investment, where developers will need to employ architects and / or urban designers as part of most development proposals.</p> <p>The introduction of taller buildings in some Centres could create additional shading, privacy and visual dominance effects that the community are not accustomed to in Centres locations.</p>

Table 3: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space

Option	Key Features	Advantages	Costs and Risks
<p><i>insulation for residential developments.</i></p> <ul style="list-style-type: none"> • <i>Re-define main street frontages (primary and secondary streets) as they relate to the function of each Centre.</i> • <i>Make the creation of inactive gaps in the streetscape (including car parking) and buildings with inactive elevations on primary and secondary street frontages a Discretionary Activity.</i> • <i>Tighten building bulk and location provisions at zone interfaces.</i> • <i>Introduce new mass and height provisions for</i> 	<p>control building height, mass (in sub-regional centres), building set-backs from residential and open space areas, noise insulation and ventilation for residential activities, noise insulation in the port noise affected area.</p> <p>Rules and Standards will be used to control developments on primary and secondary street frontages where active building edges and display windows will be required, and inactive gaps in the streetscape will be discouraged (including car parking areas).</p> <p>The extent of many primary and secondary street frontages, where shop front windows and verandahs are required, has expanded (refer Planning Maps 43 – 49, and 49a) from what has been previously recognised.</p>	<p>The Residential and Central Area chapters use Design Guidance, and these methods for managing outcomes in the built environment are well accepted. The development community is generally accustomed to working with these types provisions. Giving effect to these new rules and design guides should therefore be relatively efficient.</p>	

Table 3: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space			
Option	Key Features	Advantages	Costs and Risks
<i>Johnsonville and Mt Cook (Adelaide Road), and in future Kilbirnie.</i> This option is recommended.			

9.8 Background Documents

- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008
- Plan change 52
- Central Area Design Guide
- Residential Area Design Guide
- Urban Development Strategy, 2006
- Greater Wellington Regional Policy Statement
- Proposed Regional Policy Statement for the Wellington region
- Wellington Regional Strategy
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Ministry of Justice (2005) – National Guidelines for Crime Prevention through Environmental Design in New Zealand

10. *Building Efficiency and Sustainability*

6.2.4 To promote energy efficiency and environmental sustainability in new building design.

10.1 Proposed Policies and Methods

6.2.4.1 Promote a sustainable built environment in Centres, involving the efficient end use of energy and other natural and physical resources and the use of renewable energy, especially in the design and use of new buildings and structures.

6.2.4.2 Ensure all new buildings provide appropriate levels of natural light to occupied spaces within the building.

METHODS

- Advocacy of Environmentally sustainable design principles, Education
- Design Guides

10.2 Background

New building works are users of natural and physical resources that can have adverse effects on the environment (including cumulative effects) for example, through high rates of water use or electricity consumption. Opportunities to incorporate sustainable building design features and to use sustainable building methods will be encouraged to minimise potential adverse environmental effects. A development that proposes an environmentally sustainable designed building will be viewed as having a positive effect of the proposal on the environment.

Because sustainable building design involves the site-specific context and function of the building, the options for taking up different design features and methods will vary from case to case. With respect to Centres this may be in the form of new development incorporating sustainable and energy efficient building design principles, and the use of renewable energy sources for space and water heating, and electricity generation. This may involve more simple energy efficiency design principles such as correct building orientation to the sun, to assist in passive solar heating, cooling and natural lighting. Many of these activities may not require resource consent, but the Council recognises its responsibility in terms of role model and advocate to encourage the use of renewable energy and energy efficiency.

Ongoing developments in the technology and information about sustainable building design mean that options for this type of approach are likely to evolve over the life of the Plan. Accordingly, the Council will look to other research and industry organisations for guidance on the latest technology, methods and tools to achieve environmentally sustainable buildings.

Making provision for natural light to all habitable and high use areas of new buildings will help to reduce the on-going energy requirements of new buildings as well as provide more comfortable living environments for occupants.

Many matters relating to sustainable building design are addressed by the minimum standards outlined in the Building Act 2004 (specifically the Building Code). However, where it is practicable, sustainable building design and associated methods that go beyond the minimum standards of the Building Code will be promoted.

11. Access and Transport

- 6.2.5 To maintain an efficient and sustainable transport network to enable for the provision of convenient and safe access for people and goods to and within Centres.**

11.1 Proposed Policies and Methods

Multiple transport modes

- 6.2.5.1 Ensure that activities and developments are designed to be accessible by multiple transport modes.**

Managing adverse effects

- 6.2.5.2 Ensure that the location and design of activities and developments that generate significant levels of traffic or provide high levels of on-site parking are accessible by other transport modes and do not result in:**

- a significant increase in traffic that would be incompatible with the capacity of adjoining roads and their function in the road hierarchy, or would lead to unacceptable congestion; or
- the creation of an unacceptable road safety risk.

Roading hierarchy

- 6.2.5.3 Support and maintain the roading hierarchy, as identified on District Plan Map 33**

Accessibility for people with restricted mobility

- 6.2.5.4 Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility.**

Pedestrian network and accessibility

- 6.2.5.5 Maintain and enhance existing pedestrian accessways and thoroughfares, and where opportunities arise, create new thoroughfares and enhance pedestrian accessibility.**

Servicing and site access

- 6.2.5.6 Require the provision of appropriate servicing and site access for activities in Centres.**

METHODS

- Planning Maps
- Rules
- Design Guides
- Johnsonville Centres Plan
- Adelaide Road Framework
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)

- National standard access design criteria including NZS 4121:2001 (or subsequent amendments)
- Operational activities (WCC Transport Strategy, Walking and Cycling Plans)
- Annual Plan
- Long Term Council Community Plan
- Other mechanisms (Regional Land Transport Strategy)

11.2 Background

As Wellington continues to grow, there is likely to be increasing pressure on the City to accommodate larger numbers of people travelling to and within the urban environment. This produces a complex pattern of journeys and places considerable pressure on the existing road and public transport infrastructure.

While car-based traffic is likely to remain as the predominant transport choice, it can have adverse effects on people's health and on the urban character of Wellington. These include:

- road safety problems for residents, drivers and other road users;
- the effects on health of vehicle emissions, traffic noise and a lack of exercise brought on by the increased use of the private car;
- road safety problems for residents, drivers and other road users; deterioration in the environment of residential areas and Centres brought about by excessive traffic speeds and use by non-local traffic;
- restrictions on the movement of pedestrians, cyclists and people with special mobility needs, as well as severance of local communities, through the presence of roads and heavy traffic;
- congestion, resulting in less convenience for people making local trips, by bus and by car;
- heavy demand for kerbside parking and loading space leading to 'saturated' parking conditions, with vehicles circulating looking for space.

For these reasons, Council considers it essential that management of traffic for new activities and development is treated comprehensively, taking account of all road users.

One way in which Council can improve transportation options around the City is through land use planning which carefully considers types of transport modes available in the area, as well as the location and scale of activities and development, parking control and the promotion of environmentally-friendly modes of travel and movement. By supporting this position, improved transportation options can:

- Help reduce traffic congestion, facility costs, road risk, environmental impacts and consumer costs
- Allow consumers to save money, avoid stress, and reduce their need to chauffeur non-drivers
- Provide consumer sovereignty by enabling them to choose the most efficient option for each trip
- Help break down personal and economic limitations for people who are physically, economically or socially disadvantaged
- Create a more livable City by improving the walking and cycling environment
- Create public health benefits from increased walking and cycling

- Help develop a diverse and flexible transportation system that can accommodate variable and unpredictable conditions. Even people who do not currently use a particular form of transport may value its availability as a form of insurance to accommodate future needs.

Improved transportation modes can give people better options for where they live and work. For example, many people want to continue living in their community as they become older, rather than moving to a specialised retirement community. For this to be possible, the City must provide transportation services for people with various needs and abilities, including good walking facilities, support for mobility aids and wheelchairs, and special mobility services. Similarly, lower-income workers, and families with children, have special needs that require a diverse transportation system and accessible land use patterns.

With this in mind, Council will negotiate improvements to bus and rail services and to pedestrian and cyclist facilities for new activities and developments through the resource consent process.

However, in doing so, the Council recognises that many of the solutions to Wellington's traffic and public transport problems do not lie wholly within its control. The City's transportation system is shaped by the actions of many authorities or organisations, including Greater Wellington Regional Council, the New Zealand Transport Agency and companies involved in the movement of people and freight on land, sea or air. Where there are opportunities for input, Council will advocate for improved accessibility. Council will continue to work closely with Greater Wellington Regional Council on transportation matters and the District Plan will remain consistent with the Regional Policy Statement, the Regional Land Transport Strategy and relevant plans.

11.3 Car parking

Council policy has for many years promoted the use of public transport and as part of this has not required on-site parking in business and commercial areas since the Plan was first notified. However it is also recognised that for convenience sake, many people will journey to their local Centre in their private vehicle. Monitoring has identified that successful Centres have a readily available supply of car parks. The need to balance these two issues identifies that the current approach, to let the market dictate where and if carparks are created, is still largely appropriate. Council does provide for kerb side parking where possible to assist in the balance.

Other concerns with parking relate to ensuring large parking areas do not have an impact on the roading network or urban design qualities of an area from inappropriate location, layout and design or location of access points.

11.4 Access and servicing

Well-designed on-site loading and safe access to sites is required to help prevent traffic congestion or conflict between street users. Providing space for vehicles to service sites off the street, and ensuring that all vehicles enter or leave a site in a safe and efficient manner, will help keep traffic flowing smoothly and let pedestrians get around more easily. Where any road has been declared to be a limited access road, access to that road shall be subject to the requirements of the New Zealand Transport Agency.

Through the Suburban Centre review monitoring it was identified that many smaller clusters of shops, mainly in Neighbourhood sized Centres, do not have on-site servicing and site access requirements even though they are presently required to provide these. Given the small scale and nature of these smaller Neighbourhood Centres, it is considered appropriate to dispense with this requirement. However on site servicing and site access standards are required in all other Centres, although demands of particular developments may justify variations from these standards.

11.5 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 4: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p>This option is not recommended.</p>	<p>No on site parking required. Parking able to be established anywhere, although resource consent required for 120 or more car parks to assess safety and road impact issues.</p> <p>On site servicing required for all suburban centre zoned sites.</p>	<p>Low implementation costs due to low regulatory nature of the provisions.</p>	<p>Does not promote alternative transport modes and is therefore not in keeping with the Urban Development Strategy or the Regional Policy Statement.</p> <p>Does not provide the opportunity to assess impacts on the roading network arising from activities that generate high traffic flows.</p>
<p>Option 2 – provisions proposed in the draft plan change.</p> <ul style="list-style-type: none"> • <i>Activities with 70 or more car parks, or that occupy a building of 5000m² in area or more, will require a resource consent as a Restricted Discretionary Activity.</i> • <i>Parking areas on primary or secondary street</i> 	<p>No on site parking required.</p> <p>Activities that occupy large buildings or that provide 70 or more carparks will be assessed for impact on the road network.</p> <p>Large scale retail activities and out of centre retail activities will be able to be assessed for their impact on the roading network and also for their ability to support alternative transport modes, such as public transport.</p>	<p>Streamlines the Plan by removing onerous servicing requirements for Neighbourhood Centres.</p> <p>Will contribute to improving the streetscape of primary and secondary street frontages by discouraging car parking to front these streets, and being able to assess proposals that include parking fronting these streets.</p> <p>Increased ability to assess the impact of high traffic generating activities on the roading network. Seeks to better support and maintain the sustainability of the roading network.</p>	<p>This option may generate the need for more resource consents and therefore increase the costs of implementing the Plan.</p> <p>Buildings that are over 5000m² may not necessarily generate high traffic numbers resulting in more resource consents and therefore increase the costs of implementing the Plan</p>

Table 4: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<p><i>frontages require resource consent as a Discretionary Activity.</i></p> <ul style="list-style-type: none"> • <i>No on site servicing will be required in Neighbourhood Centres.</i> • <i>Maintain existing parking layout and site access provisions.</i> <p>This option is not recommended.</p>		<p>The need to provide parking for large scale and activities that generate high volumes of traffic will be managed.</p> <p>The Urban Development Strategy and Regional Policy Statement will be supported by the promotion of activities that are able to be serviced by alternative transport modes, including public transport. This will assist in achieving a sustainable compact urban form.</p>	
<p>Option 3 – proposed new policies, rules and standards.</p> <ul style="list-style-type: none"> • <i>Activities with 70 or more car parks will require a resource consent as a Restricted Discretionary Activity.</i> • <i>Parking areas on primary or secondary street frontages require</i> 	<p>No on site parking required.</p> <p>Provides key matters of assessment for activities and developments that provide high levels of on site parking.</p> <p>Large scale retail developments exceeding 20,000m² gross floor area will be assessed for their ability to support multiple access modes, pedestrian</p>	<p>Is relatively light on regulation, thus is anticipated to be cost effective and efficient to implement.</p> <p>Streamlines the Plan by removing onerous servicing requirements for Neighbourhood Centres.</p> <p>Will contribute to improving the streetscape of primary and secondary street frontages by discouraging car parking to front these streets, and being able to assess proposals that include parking fronting these streets.</p>	<p>This option may generate the need for more resource consents and therefore increase the costs of implementing the Plan.</p> <p>May not necessarily alleviate peak-hour and other congestion issues currently felt in some centres.</p>

Table 4: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<p><i>resource consent as a Discretionary Activity.</i></p> <ul style="list-style-type: none"> • <i>Improved access for pedestrians and those with mobility restrictions</i> • <i>Promotion of multiple modes of transport</i> • <i>No on site servicing will be required in Neighbourhood Centres.</i> • <i>Maintain existing parking layout and site access provisions.</i> <p>This option is recommended.</p>	<p>friendliness and reduce impacts on the roading network.</p>	<p>The impacts for larger retail developments that tend to generate high traffic numbers on the roading network will be assessed. This will be better managed in support of maintaining the sustainability of the roading network.</p> <p>The Urban Development Strategy and Regional Policy Statement will be supported by the promotion of activities that are able to be serviced by alternative transport modes, including public transport. This will assist in achieving a sustainable compact urban form.</p>	

11.6 Background Documents

- WCC - Wellington – our sense of place: building a future on what we treasure (2004)
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Transport Strategy (2004) and Transport Strategy in the Urban Development Strategy (2006)
- Greater Wellington Regional Policy Statement
- The Australian and New Zealand Standard 2891.1 – 2004, Parking Facilities, Part 1: Off-Street Car Parking

12. Signs

6.2.6 To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.

12.1 Proposed Policies and Methods

6.2.6.1 Manage the design of signs (and their associated structures and affixtures) to enhance the quality of signage within Centres.

6.2.6.2 Manage the scale, intensity and placement of signs to:

- **maintain and enhance the visual amenity of the host building or site, and**
- **reduce visual clutter and viewer confusion, and**
- **ensure public safety.**

6.2.6.3 Ensure signs in Centres do not adversely affect the architectural integrity of the building on which the sign is located.

6.2.6.4 Ensure that signs contribute positively to the visual amenity of the building neighbourhood and cityscape.

6.2.6.5 Control the number and size of signs within heritage areas.

6.2.6.6 Ensure that signs in Centres do not adversely affect the amenity of nearby Residential Areas.

METHODS

- Rules
- Design Guides (Centres Design Guide, Signs Design Guide)
- Other mechanisms (WCC Bylaws, Encroachment Licenses, Building Act, Advertising Standards Authority)

12.2 Background

Signs of all types are an anticipated and established part of Centres environments in helping people understand what goods and services are on offer. However, the scale, number, illumination, motion and placement of signs are all matters that need to be managed to avoid or manage adverse effects on public safety, the appearance and amenity values of Centres, and the character and appearance of buildings and Heritage Areas.

The signage policies (and other provisions) have been specifically drafted to provide significant flexibility to respond to the varied nature of activities in Centres and their differing signage requirements and as a result do not limit the number of signs permitted on a site. However, in providing this flexibility, Council wishes to ensure that this flexibility is not abused. Council does not accept that making provision for multiple signs should be used as an argument to enable larger, more intrusive signage. For this reason, the explanation of Policy 6.2.6.4 explicitly states that Council will not apply a permitted baseline assessment (i.e. a comparison of the proposed sign against a hypothetical signage scenario that complies with the signage standards outlined in the Plan).

This is particularly relevant when assessing third party (billboard) signage. Third party (billboard) signage is often larger and more visually dominant than signage associated with a specific activity. Third party signage was identified through Suburban Centre monitoring as generally being associated with a higher degree of adverse effects and in this regard the signage policies (and provisions) seek to manage these affects.

Ensuring signs maintain public safety is also important. Because of this, illuminated, animated and flashing signs are controlled to prevent conflict with traffic safety.

Through the Suburban Centres review it also became apparent that some of the existing signs provisions were subject to interpretational difficulties, making Plan implementation difficult and inefficient.

12.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 5: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p>This option is not recommended.</p> <p>This option is not recommended.</p>	<p>A broad range and size of signage is permitted, including several signs able to be erected on a single building façade.</p>	<p>Relatively low cost to implement as sign provisions are generous in proportion and number.</p>	<p>Signage is detracting from Centres, thus is not maintaining or enhancing the amenity values in Centres so these provisions are not achieving the purpose of the Act (particularly as regards to section 7).</p>
<p>Option 2 – new provisions proposed in the draft plan change.</p> <ul style="list-style-type: none"> clarified the intent of existing rules; in particular to locate signs on plain walls when attached to buildings, and to ensure signs do not project above the part of the building on which the sign is located. apply rules to control illuminated/animated signs that 	<p>These provisions recognise a broader range of scenarios where signage is likely to have adverse effects, including Heritage Areas and signs erected on structures as well as buildings.</p> <p>Overall, the size and scale of permitted signs to be reduced.</p> <p>Introduction of a Signs Design Guide to assist in assessing signs that require a resource consent.</p>	<p>Signage will be better managed and therefore less likely to generate adverse effects on the appearance and amenity values of Centres, and the character and appearance of buildings and Heritage Areas.</p> <p>Clarification of existing rules will increase efficiency in implementing the Plan.</p> <p>Public safety will improve by controlling signs that can create traffic hazards.</p> <p>Rules around temporary signage will be relaxed, thus assisting temporary activities in establishing.</p>	<p>It is possible that the more restrictive provisions will give rise to additional resource consent applications, thus making the Plan more costly to implement.</p> <p>Third party signage would still be able to be erected as of right in Centres.</p> <p>Potential for multiple signs to be used as an argument to enable larger, more intrusive signage in a permitted baseline argument.</p>

Table 5: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<p>pose a potential traffic safety hazard.</p> <ul style="list-style-type: none"> • apply rules to control signs within identified Heritage Areas. • Permit certain types of temporary signs. • Apply rules to signs located on any structure. <p>This option is not recommended.</p>	<p>The policy explanations offer assessment guidance for considering resource consent applications.</p>		
<p>Option 3 – proposed new policy provisions</p> <ul style="list-style-type: none"> • clarify the intent of existing rules; in particular to locate signs on plain walls when attached to buildings, and to ensure signs do not project above the part of the building on which the sign is located. • apply rules to control illuminated/ 	<p>These provisions recognise a broader range of scenarios where signage is likely to have adverse effects, including Heritage Areas, third party signs and signs erected on structures as well as buildings.</p> <p>Overall, the size and scale of permitted signs will be reduced.</p> <p>Introduction of a Signs Design Guide to assist in</p>	<p>Signage will be better managed and therefore less likely to generate adverse effects on the appearance and amenity values of Centres, and the character and appearance of buildings and Heritage Areas.</p> <p>Clarification of existing rules will increase efficiency in implementing the Plan.</p> <p>Public safety will improve by controlling signs that can create traffic hazards.</p> <p>Rules around temporary signage will be relaxed, thus assisting temporary activities in establishing.</p>	<p>It is possible that the more restrictive provisions will give rise to additional resource consent applications, thus making the Plan more costly to implement.</p>

Table 5: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<p>animated signs that pose a potential traffic safety hazard.</p> <ul style="list-style-type: none"> • apply rules to control signs within identified Heritage Areas. • Permit certain types of temporary signs. • Apply rules to signs located on any structure. • Restrict third party signage. <p>This option is recommended.</p>	<p>assessing signs that require a resource consent.</p> <p>The policy explanations offer assessment guidance for considering resource consent applications.</p> <p>The potential permitted baseline argument for multiple signs to be used to enable larger, more intrusive signage is removed.</p>		

12.4 Background Documents

- District Plan Monitoring Programme – Effectiveness of the Plan Relating to Heritage
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008

13. Subdivision

6.2.7 To ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated.

13.1 Proposed Policy and Methods

6.2.7.1 Ensure the sound design, development and appropriate servicing of all subdivisions.

METHODS

- Rules (Code of Practice for Land Development)
- Design Guides (Subdivision Design Guide Centres Design Guide,)
- Other mechanisms (WCC Bylaws)

13.2 Background

Implementation and monitoring of the effectiveness and efficiency of the District Plan and other research has not indicated notable deficiencies in the way existing provisions achieve the above objective. Only minor changes are proposed to enhance the effectiveness of the provisions, and specifically to improve the workability of permitted subdivision rules.

The process of subdividing land and buildings sets out the structure for future development and the potential demand on public services and infrastructure. The layout of new subdivisions often remains a durable feature of the environment. This is particularly the case for the layout of roading networks and other infrastructure. Council's Code of Practice for Land Development guides subdivision design and provides a framework for considering subdivision proposals.

The one key area where change is to the permitted activity subdivision rule is the addition of two standards relating to the undergrounding of services where new roads are proposed; and to proposed subdivisions at Churton Park, which must comply with the Churton Park Village Concept Plan and associated provisions. In addition, explanatory text under the policies has been amended to include reference to master, concept and structure plans where these have been prepared and are relevant for assessing subdivision activities.

Permitted Activity subdivisions are very rare as a result of the difficulties in passing all standards. These standards were reviewed and where changes could be made without increasing risk of adverse effects then these have been recommended. It is intended these minor changes will improve the workability of that permitted activity rule, resulting in its more frequent use and ultimately a more efficient Plan.

The existing provisions were examined at the time of being included in the 'first generation' District Plan, and with minor amendments to improve the workability of permitted rules, continue to remain relevant and appropriate.

13.3 Background Documents

- District Plan Change 45 – Urban Development Areas and Structure Plans
- District Plan Change 46 – Subdivision Design Guide

14. Natural and Technological Hazards

6.2.8 To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

14.1 Proposed Methods

6.2.8.1 Identify those hazards that pose a significant threat to Wellington, to ensure that areas of significant potential hazard are not occupied or developed for vulnerable uses or activities.

6.2.8.2 In relation to the Wellington fault, discourage the location of new structures and buildings within the ‘Hazard (Fault Line) Area’.

6.2.8.3 Ensure that the adverse effects of hazards on critical facilities and lifelines are avoided, remedied or mitigated.

6.2.8.4 Ensure that the adverse effects on the natural environment arising from a hazard event are avoided, remedied or mitigated.

6.2.8.5 Ensure that buildings and structures do not exacerbate natural hazards, particularly flood events.

METHODS

- Rules
- Advocacy
- Operational mechanisms (WCC enforcement of the Building Act and as a Civil Defence Authority)

14.2 Background and proposed changes to achieve above objective

Implementation and monitoring of the effectiveness and efficiency of the District Plan and other research has not indicated any deficiencies in the way existing provisions achieve the above objective. The policies and methods are workable and only very minor wording changes have been made to enhance the effectiveness of provisions.

While most of the rules and other methods relating to natural and technological hazards in Centres have been retained, a new policy has been introduced to recognise the potential risk posed by fault line hazards. As part of the ongoing review of the District Plan, Proposed District Plan Change 1 considered the specific flood hazard found in the Tawa and Takapu Area. Proposed District Plan Change 22 considered the specific matter of identifying the Hazard (Fault Line) Area. District Plan Change 1 became operative in 2002 and District Plan Change 22 in 2004. Until such time as further monitoring or practice indicates these provisions are deficient, it is accepted on the basis of the recent review that the provisions are appropriate. Likewise, the appropriateness of the other provisions was considered at the time of being included in the ‘first generation’ District Plan, and these remain relevant and appropriate.

Through the consultation process of the Suburban Centres Review, the Regional Council identified a hazard issue with the Porirua Stream and requested that the yard setback be increased and clarified that it should apply to structures as well as buildings. The objective and policies are considered workable and only very minor

wording changes have been requested to the explanations under Policy 6.2.8.5 to refer to structures as well as buildings, thus enhance the effectiveness of provisions.

14.3 Background Documents

District Plan Change 1 – Tawa and Takapu Flood Hazard Areas

District Plan Change 22 – Hazard (Fault Line) Areas Realignment and Rules

15. Hazardous Substances

6.2.9 To prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal.

15.1 Proposed Policies and Methods

- 6.2.9.1 Ensure the environment is safeguarded by managing the storage, use, handling and disposal of hazardous substances.**
- 6.2.9.2 Reduce the potential adverse effects of transporting hazardous substances.**
- 6.2.9.3 Control the use of land for end point disposal of waste to ensure the environmentally safe disposal of solid and hazardous waste.**
- 6.2.9.4 To require hazardous facilities to be located away from Hazard Areas.**
- 6.2.9.5 In assessing an application for a resource consent relating to hazardous substances, the following matters will be considered:...**

METHODS

- Rules
- Rules (conditions on resource consents)
- Operational activities (Waste Management Strategy)
- Designation
- Other mechanisms (advocacy and bylaws, Regional Plans [and Hazardous Substances and New Organisms Act 1996].]^{PC35} NZ land transport legislation (including Land Transport Act 1998, Land Transport Rule: Dangerous Goods 1999 and New Zealand Standard 5433:1999) or subsequent amendments]^{PC35} Health Act, Hazardous Substances and New Organisms Act 1996 and its Transitional Provisions, Health and Safety in Employment Act, 1992)
- WasteTRACK database tracing system
- Other mechanisms

15.2 Background

Council is concerned that the community and environment should not be exposed to unnecessary risk from hazardous substances. The District Plan aims to control use of land in order to prevent or mitigate any potential adverse effects of hazardous substances by considering the appropriateness of the site location and other site requirements to minimise the risk of accidental release. Although these are only two facets of hazardous substances management, others are outside the scope of the District Plan.

The hazardous substance provisions of this Plan work in conjunction with the provisions for hazardous substances under the Hazardous Substance and New Organisms Act 1996. Controls imposed on hazardous substances under the Resource Management Act cannot be less stringent than those set under the Hazardous Substance and New Organisms Act 1996. This requirement is reflected in the rules for hazardous substances in this Plan.

District Plan Change 35 reviewed all hazardous substances provisions throughout the Plan. That plan change sought to update the provisions in response to amendments to the HSNO Act and also to incorporate the updated Hazardous Facilities Screening Procedure.

Until such time as further monitoring or practice indicates these provisions are deficient, it is accepted that the provisions should be retained.

It is noted that the operative District Plan policies relating to contaminated land have been deleted from the review. These policies have been incorporated into a separate chapter as a result of proposed District Plan Change 69.

15.3 Existing provisions proposed to be retained

Most of the provisions are being retained in their current form. The effectiveness and efficiency of these provisions was considered as part of the ongoing review of the District Plan that resulted in the update of these provisions as part of District Plan Change 35. The appropriateness of existing provisions was examined as part of the section 32 analysis of District Plan Change 35 that became operative in 2005.

15.4 Proposed changes to achieve the above objective

Two main changes are proposed to the provisions. One policy has been reworded for the sake of clarity but with no change to the policy's intent. The second change is a new policy relating to the assessment of applications for resource consent relating to hazardous substances.

15.5 Background Documents

- District Plan Change 35 – Hazardous Substances
- District Plan Change 69 – Contaminated Land

16. Tangata Whenua

6.2.10 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.

16.1 Proposed Policies and Methods

6.2.10.1 Identify, define and protect sites and precincts of significance to tangata whenua and other Maori using methods acceptable to tangata whenua and other Maori.

6.2.10.2 Enable a wide range of activities that fulfil the needs and wishes of tangata whenua and other Maori, provided that the physical and environmental conditions specified in the Plan are met.

6.2.10.3 In considering resource consents, Council will take into account the principles of Te Tiriti o Waitangi/the Treaty of

Waitangi.**METHODS**

- Rules (condition on resource consent, consultation)
- Information

16.2 Background

Maori concepts present a different view for the management of the City's natural and physical resources. In particular, kaitiakitanga is a specific concept of resource management. By acknowledging ancestral relationships with the land and natural world, a basis can be constructed for addressing modern forms of cultural activities.

Particular features of the natural and cultural landscape hold significance to tangata whenua and other Maori. The identification of specific sites (such as waahi tapu/sacred sites and waahi tupuna/ancestral sites) and precincts will ensure that this significance is respected. For this reason, sites of significance and precincts are listed and mapped within the Plan.

Monitoring of the effectiveness and efficiency of the District Plan, and other research and consultation has generally not indicated the need to change existing provisions at this time. Council will continue to work with local iwi to identify sites and precincts of interest to tangata whenua, which may result in further plan changes in the future. The Plan may also need to be updated to recognise any future Iwi Management Plans.

Chapter 2 of the District Plan which deals with Issues for Tangata Whenua will be reviewed as part of the Council's ten yearly review of the plan.

Part E Examining the appropriateness of objectives – Business Areas

The following evaluations show the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act.

Some of the proposed objectives build on existing objectives of the Operative District Plan with some subtle changes, while other objectives are completely new. The appropriateness of the existing provisions was considered at the time of being included in the ‘first generation’ District Plan (in 1994). The evaluation below shows that the existing provisions continue to remain relevant and appropriate.

An evaluation of objectives under section 32 must examine:

(3) (a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act,

The purpose of the Act:

- 5 (1) *The **purpose of the Act** is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, “sustainable management” means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The evaluation below considers each objective in terms of different elements that make up the purpose of the Act. That is, enabling people to provide for their *social wellbeing, economic wellbeing, cultural wellbeing* (5(1)), and in terms of sections 5(2)(a), 5(2)(b), and 5(2)(c). The evaluation also considers other questions, such as:

- What would happen without the objective?
- Does the objective relate directly to the issue, and address a significant aspect of the issue?
- Would achieving the objective make a substantial difference, in terms of resolving the issue?

Policies, guidelines and other material on how to achieve that purpose are also referred to where relevant.

In assessing the extent to which the objective is the **most appropriate** way to achieve the purpose of the Act, it is necessary to look at the proposed policies and methods that will implement the objective. The analysis of those provisions should

ideally reveal that the cost of pursuing the objective does not significantly outweigh the benefits.

33.2.1 To provide Business Areas that can accommodate a wide range of business and industrial activities to meet the social and economic needs of the City.

Monitoring of the City’s existing Suburban Centres and research undertaken for the Council has identified that the amount of vacant industrial land in Wellington has reduced dramatically since the early 1990s, and that a significant proportion of this land has been developed for higher order land use activities, such as retail and residential activities, rather than industrial activities.

This has resulted in increased pressure on the existing vacant industrial supply, with future projections indicating that there could be a demand for additional industrial land of between 77-100 hectares over the 2007-2021 period.

As a result of land supply issues and land values, most industrial land activity in the region is situated in the Hutt Valley or Porirua. A future shortfall in industrial land will impact on the overall economy of the City and therefore should be managed in a way which best enables the community to provide for its economic wellbeing and safety.

This objective aims to protect the City’s industrial and business land resource through recognising the need to provide a zone where business and industrial land uses are the primary activities, setting the character and amenity values to be found in the Business Area zone. This objective also seeks to increase the land supply for business and industrial activities through re-zoning, if possible.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	<p>Over the last decade or so, the amount of vacant land in Wellington suitable for business and industrial activities has reduced dramatically. One issue is that retail and residential activities have been encroaching into areas traditionally industrial areas. As a result of land supply issues and land values, most industrial land activity in the region is situated in the Hutt Valley or Porirua.</p> <p>The retention of a sufficient supply of land available for industrial and business activities will provide places of employment, thus allowing for the economic and social wellbeing of people and communities.</p> <p>Avoiding, remedying or mitigating adverse effects on the environment helps to provide for people’s health and safety.</p>
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	<p>The potential of Wellington’s industrial land resource has not been sustained over the past decade. This objective now aims to achieve that whilst avoiding, remedying or</p>
Safeguarding life-supporting capacity	

Avoiding, remedying, or mitigating any adverse effects on the environment	<p>mitigating adverse effects of any activity (such as noise, glare or traffic congestion), including incompatible activities establishing in industrial and business locations.</p> <p>By virtue of minimising adverse environmental effects this objective also contributes to safeguarding the life-supporting capacity of specific resources (such as air).</p>
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- ***What would happen without this objective?***

Without this objective and the separation of industrial and business land from the City’s Centres, industrial activities will continue to have to compete with higher order land uses, such as retail and residential, for suitable land. The result will be that the availability of industrial and employment land within Wellington City will continue to be in short supply in the future, and the city will continue to lose its industrial activities to other locations in the Region.

A future shortfall in industrial land will impact on the overall economy of the City through loss of diversity, and will have adverse effects on social wellbeing through loss of range in the employment market. The industrial land supply should therefore be managed in a way which best enables the community to provide for its economic wellbeing and safety.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

This objective relates directly to two key issues, 1) the insufficient supply of land for industrial and business activities in the city; and 2) the protection of what is left of that land supply from competing land uses.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, identifying and protecting industrial land and maintaining industrial character will directly contribute to resolving the issue.

This objective supports the Wellington Regional Strategy which identifies the shortage of industrial land as being an issue for the Region’s economic building blocks, and the Proposed Regional Policy Statement that recognises that importance of sufficient industrial-based employment location or capacity to meet the region’s needs. Research undertaken as part of the Suburban Centres review indicates that Wellington City could be short of at least 40-70 hectares of industrial land over the next 15 years.

The objective is also considered to be consistent with section 7(b) of the Act, which requires regard be had to “the efficient use and development of natural and physical resources”. Better managing Business Areas will promote the efficient use and development of these important resources.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.2 To enable an appropriate range of activities to occur in Business Areas, provided they do not undermine the City's Centres, and that adverse effects are avoided, remedied or mitigated.

Monitoring of the City's existing Suburban Centres raised a number of issues, including:

1. Reverse sensitivity has emerged where residential activities have established in industrial locations, within the Wellington International Air Noise Boundary and the Outer Port Noise Affected Area.
2. There is a shortage of available and appropriately-sized and located land for the establishment of large-format retailing in Wellington City.
3. There are distributional and economic impacts related to the establishment of some retail activities in out-of-centre locations.
4. Some industrial activities could benefit from less stringent noise emission standards in industrial locations.
5. Wellington City has an undersupply of industrial land, which has the potential to impact negatively on the city's social and economic wellbeing.
6. Building bulk and height of some developments has had significant adverse impacts on adjoining residential properties.
7. In some cases where new residential activities have located in more work-based areas there is a lack of on-site amenity for those residents.

Whilst the existing market-led policy approach to land use planning has created many of the above issues, there is still merit in land use controls and standards remaining as flexible as possible in order to attract investment and businesses into the city. Accordingly, this objective only seeks to limit specific activities that would be inappropriate in the Business 1 or Business 2 Areas, or which have a strong potential to undermine Centres, and allow all other activities to occur subject to avoiding, remedying or mitigating adverse effects. The latter of which can be done effectively through standards. Primarily land use restrictions will apply to some larger scale retail activities in the Business 1 Areas and most retail activities in Business 2 Areas; and restricting noise sensitive activities (including residential) from establishing in Business 2 Areas.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	<p>The objective seeks to provide for social and economic wellbeing by allowing a relatively broad mix of activities across the zone whilst managing activities that could or would impact on the viability of Centres and the further loss of land suitable for industrial and business activities.</p> <p>The result will be industrial and business areas that maintain their character and are able to accommodate a range of compatible activities; a hierarchy of Centres that provide for the day-to-day social and economic needs of communities; and mixed use areas that provide for a broad range of retail, residential and business activities.</p>
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	

Sustaining the potential of natural and physical resources	<p>Land is a finite resource and there is a shortage of land in Wellington that is suitable for industrial and business activities. By providing Business Areas that can accommodate a wide range of business and industrial activities while removing undue obstacles to the establishment of these activities, the full potential of the land resource dedicated to industrial land uses will be sustained.</p> <p>All activities generate effects; it is proposed to allow activities to establish whilst ensuring that they avoid, remedy or mitigate any adverse effects relative to the mixed use character of the Business 1 Areas or industrial character of the Business 2 Areas. This will mean less stringent emission standards will apply to activities in Business 2 Areas. Noise sensitive activities will be restricted in these Areas, as the environmental and protection standards will not provide amenity protection for such uses within the zone. This will further assist with the retention of industrial and business land, and therefore economic activity in the city.</p>
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Without the proposed objective, Wellington will remain short on the supply of industrial and business land. In addition, the Council would struggle to maintain and strengthen Centres as places in which to establish core retail activities. Both of these issues are required to secure the economic and social wellbeing and the sustainable development of the city.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

The significant aspects of the above issues this objective addresses are the loss of industrial land, the need to accommodate retail activities, the need to ensure Centres remain viable and vibrant, and the need to address adverse effects generated by activities, including reverse sensitivity.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes. By achieving this objective, industrial and business activities will have dedicated areas in which to establish where they would not have to compete for land resources with higher order land use activities, or with incompatible land uses that generate reverse sensitivity effects on them. At the same time, a fair and appropriate balance has been struck in managing retail, with most retail activities still maintaining flexibility in their choice in location. In addition, adverse effects arising from activities will be required to be avoided, remedied or mitigated.

The proposed objective is considered to be in keeping with section 7(b) the efficient use and development of natural and physical resources and 7(c) the maintenance and enhancement of amenity values.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.3 To recognise where unique development opportunity areas exist within Business Areas and encourage redevelopment of these in a manner that is compatible with, and enhances amenity values and contribute to the City’s distinctive physical character, sense of place and contained urban form.

This objective is primarily aimed at areas where brownfield development could occur and positively contribute to the City. Presently the only identified area, or precinct, is at Shelly Bay which is former Defence Force site located on the northern side of the Miramar Peninsula. It is likely that there are other sites within the City that could arise really for potential redevelopment in the future, such as the prison site on the ridge of the Miramar Peninsula. Business 1 zoning for such sites is considered appropriate because of its flexible nature in providing for a mix of activity types and this, coupled with the use of Master/Structure/Concept planning exercises is seen as a real advantage to such areas.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	Brownfield areas represent unique opportunities in catering for developments that have the potential to enhance social, economic and cultural wellbeing. These opportunities need to be recognised and fostered if they are to benefit the city.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Land is a finite resource and so when opportunities arise to re-develop, the full potential of that land should be encouraged to be realised.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	Ensuring that redevelopment of these sites is undertaken in a manner that is compatible with and enhances amenity values and contribute to the City’s distinctive physical character, sense of place and contained urban form will sustain the potential of natural and physical resources and will help to avoid adverse effects on the environment.

• ***What would happen without this objective?***

Potential missed opportunities to realise the social, cultural and economic benefits that can come out of brownfield developments.

• ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective seeks to encourage redevelopment of land where opportunities arise.

• ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, if this objective is achieved it will foster the redevelopment of land that has the potential to positively contribute to the city.

Having regard to section 7 of the Act, the proposed objective is considered to be in keeping with section 7(b) of the Act, the efficient use and development of natural and physical resources.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.4 To ensure that activities and developments at least maintain the amenity values and public safety within Business Areas and those of any other nearby Centres, Residential, Open Space or Rural Areas.

Monitoring of the City's existing Suburban Centres raised a number of issues, including:

1. Building bulk and height of some developments has had significant adverse impacts on more sensitive areas such as residential.
2. Some industrial developments are detracting from the appearance of key arterial corridors such as at Evans Bay, Ngauranga Gorge.
3. Building designs that do not relate to context, that are out of scale with surrounding development and that dominates sites are detracting from the built environment.
4. Building designs that do not relate to context, that are out of scale with surrounding development and that over dominate sites are detracting from the built environment.
5. Areas with an industrial character need to be able to retain that character and the lower levels of amenity value associated with it

It is recognised that Business Areas do not hold the same level of amenity values as would be expected in Centres or the Central Area. In particular, maintaining an industrial character in the Business 2 areas indicates that amenity values are likely to be relatively low. However, in the Business 1 areas where mixed uses are encouraged higher amenity values are expected to be maintained, particularly as residential activities are encouraged. In all cases however, the amenity values of other more sensitive receiving environments need to be maintained.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	Recognising and enhancing different areas and features that contribute to the physical character of Business Areas will help ensure an appropriate environment in
Enabling – economic wellbeing	
Enabling – cultural wellbeing	

Enabling – health and safety	which people can provide for their social, cultural and economic wellbeing. It is important that amenity values, whether they are high or low, are appropriately managed so that people feel both comfortable and safe in their working and living environments.
Sustaining the potential of natural and physical resources	In Business 2 Areas the potential of the land resource for industrial activities would be hindered if high amenity values and standards were expected to be maintained. Therefore in these areas lower levels of amenity will be allowed for, provided activities and developments do not detrimentally impact on adjoining, more sensitive, receiving environments. In Business 1 Areas where mixed uses are promoted, higher levels of amenity will best sustain the potential of these land resources through creating a reasonably attractive environment where people can go about providing for their social and economic needs. Again, activities and developments will need to maintain the amenity values of adjoining, more sensitive, receiving environments.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

This objective provides for the recognition of different levels of amenity value that exist within the two Business Areas, without which industrial areas might otherwise be subject to higher than necessary standards and mixed use areas might not be managed sufficiently. Additionally, this objective will maintain amenity values of any adjoining and sensitive receiving environment, which has not been done well in the recent past.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, this objective will ensure that appropriate levels of amenity will be maintained in the Business 1 and 2 Areas, and that adjoining more sensitive areas will be protected.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, better recognition will be given to adjoining and more sensitive receiving environments and that should transpire to more sensitive developments at zone interfaces. Also an appropriate level of amenity value, relative to the different characteristics present in the Business 1 and 2 areas, is recognised and maintained.

Having regard to section 7 of the Act, the proposed objective is considered to be in keeping with section 7(b) the efficient use and development of natural and physical resources (due to the lower level of amenity that will be accepted in Business 2 Areas), and 7(c) the maintenance and enhancement of amenity values.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.5 To promote energy efficiency and environmental sustainability in new building design.

Interest in energy efficiency and environmentally sustainable building design has grown in recent years. This proposed objective is new and reflects the Act's 2004 amendments that introduced new matters to have regard to in section 7: 'the efficiency of the end use of energy' and 'the benefits to be derived from the use and development of renewable resources' (s 7(ba) and (j)).

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Promoting energy efficiency and environmentally sustainable design (ESD) in new buildings means that people can design and use new buildings and structures in a way that reduces their demand on energy consumption and other resources. Energy efficiency can contribute to people's economic wellbeing where the financial cost of energy use is reduced. People can still provide for their social, economic and cultural wellbeing, and their health and safety because energy efficiency and ESD can be achieved alongside building functionality.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Promoting energy efficiency and ESD places less demand on natural and physical resources, including those used to generate and transmit electricity. To this end, the objective helps to sustain the potential of natural and physical resources, such as transmission lines, and where relevant safeguard the life-supporting capacity of resources and reduces adverse environmental effects, such as greenhouse gases.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

The issue of energy efficiency and sustainability are relatively new and without this objective, these principles may be to be overlooked in new developments. Promoting energy efficiency and sustainability in District Plan objectives will ensure developers consider these issues from the outset when they can be best dealt with at the design stage of a project.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Promoting sustainable management is the core purpose of the Act. The 2004 amendments are also closely related to central government's Sustainable Development For New Zealand Programme of Action (2003), which promotes creation of a sustainable energy system for New Zealand (Ministry of Economic Development, 2004).

Likewise, an aim of the Long Term Council Community Plan (2006/07-2015/16) is for Wellington to be 'more sustainable' through reducing its 'environmental impact by making efficient use of energy, water, land and other resources; shifting towards renewable energy resources; conserving resources; and minimising waste (4.5, Environment).

The Ministry for the Environment also promotes the potential benefits of environmentally sustainable building design through publications such as *Value Case for Sustainable Building in New Zealand*, December 2005. This includes the benefit to building users of having an appropriate level of building amenity.

The proposed objective relates directly to the issue and takes on board policy guidance mentioned above.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

It is hoped that by promoting the benefits of sustainability in building design developers will accommodate them. As technologies around green buildings are still developing, it is considered that promotion is currently the best way to resolve the issue for now.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(b) the efficient use and development of natural and physical resources; 7(ba) the efficiency of the end use of energy; and 7(j) the benefits to be derived from the use and development of renewable energy.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.6 To maintain an efficient and sustainable transport network that enables the provision of convenient and safe access for people and goods to and within Business Areas.

Monitoring of the City's existing Suburban Centres and other monitoring raised a number of issues, including:

1. Growth and development associated with population growth will increase demand on the roading and public transport networks.
2. Large retail developments attract many people and consequently have the potential to adversely impact on the roading network, particularly when located in out of Centre areas.
3. Good accessibility through roads, frequent public transport services, and pedestrian, restricted mobility and cycle access is a key factor in achieving good performance and a successfully functioning Centre
4. The inappropriate location of site accesses has the potential to affect road safety and disrupt main street functions.
5. The design, layout and location of parking areas and spaces has a direct impact on the safety and amenity values of the immediate environment.

6. There are distributional and economic impacts related to the out of Centre location of retail activities.

A key component of the Plan is ‘accessibility’ which promotes sustainable management through well organised and functioning Business Areas. At the citywide level, Wellington City Council has recently prepared a Transport Strategy (2006) that outlines principles relating to being integrated, accessible, efficient, affordable, safe and sustainable. This objective will build on these principles.

The Strategy identifies a number of areas for possible change or further investigation and review; for example, in relation to road safety, cycle safety, parking policies and bus priority measures. On completion of any further work any outcomes will be taken on board as appropriate.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act’s purpose
Enabling – social wellbeing	Ease of movement to, within and around Centres will enable people to provide for their social, economic and cultural wellbeing in a safe and efficient manner. Expenditure on roading is a significant cost to the city, so ensuring land use activities are geared toward maintaining an efficient and sustainable transport network will provide for the city’s economic wellbeing as well as health and safety. Due to the number and spread of Business Areas throughout the city, it is important to ensure that transport issues are managed to promote connectivity.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Promoting efficient access is a way of sustaining the potential of resources, including the roading network, the life-supporting capacity of specified resources, such as air, while also minimising adverse environmental effects, such as emissions of carbon monoxide and noise from traffic.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

• ***What would happen without this objective?***

Transport and access make a significant contribution to the functioning of a city, the efficiency with which things can get done and directly affect peoples health and safety. The proposed objective relates directly to these issues and addresses the underlying issue of sustainability and maintaining a compact urban form. The growth framework in the Wellington Regional Strategy considers transport and spatial (or urban) form ‘*Spatial form refers to the way road and rail is located; how our ports (airports and seaport), Centres and neighbourhoods are linked to the transport systems; and our range of housing and workplaces and where they are located. It also refers to the quality of our local areas, and how easy it is to walk, cycle or use public transport locally.*’ The RPS also recognizes the importance of integrated transportation links and states that ‘*a compact and well designed regional form enhances the quality of life for residents as it is easier to get around, allows for a greater choice of housing, close to where people work or to public transport, town centres are vibrant, safe and cohesive and business activity is enhanced*’. The RPS recognises that through transport management ‘*energy consumption and carbon*

emission are also reduced and that communities and businesses are more resilient to oil shortages or crisis, and there is reduced pressure for new infrastructure and more efficient use of existing infrastructure’.

Without this objective significant adverse effects on the efficiency of the transport network could adversely affect the city’s sustainability, economy, people’s social wellbeing and health with emissions and noise effects.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

The objective relates directly to the issues and implementation. It seeks to address the significant aspect of sustainability in the transport network.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, the issues relate to access, efficiency and the ability for the transports network to cope with anticipated growth and development. The objective to maintain a sustainable transport network will effectively deal with these issues.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(b) the efficient use and development of natural and physical resources; 7(c) the maintenance and enhancement of amenity values; and 7(f) the maintenance and enhancement of the quality of the environment.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.7 To achieve signage that is well integrated with, and sensitive to, the receiving environment and that maintains public safety.

Signs are a prominent part of any cityscape. They can come and go in quick succession or have a long standing presence in the environment. Signs that detract from the appearance of the City are reasonably common, therefore the scale, illumination, motion and placement of signs are all matters that need to be managed to avoid adverse effects.

The Council considers it important to control signs and advertisements. If there is no control over size, design and siting, they may create adverse effects to the amenity, character and appearance of buildings and streets and add clutter and visual confusion to the street scene.

How the effects of signage are managed is a key issue in respect of the quality of the built environment, and the quality of nearby residential environments. Feedback from the Council’s consent team and monitoring indicates that the current sign rules have had mixed results in controlling the effects of signs, especially when dealing with third party (billboard) signage located along the City’s key transport corridors.

Given the varied nature of activities in Business Areas which have differing signage requirements and for the sake of flexibility, no restrictions have been placed on the number of signs that a building can have which advertises the business within. However, in providing this flexibility, Council wishes to ensure that this flexibility is not abused. Council does not accept that making provision for multiple signs should be used as an argument to enable larger, more intrusive signage. Council will not apply a permitted baseline assessment (i.e. a comparison of the proposed sign against

a hypothetical signage scenario that complies with the signage standards outlined in the Plan).

This is particularly relevant when assessing third party (billboard) signage. Third party signage is often larger and more visually dominant than signage associated with a specific activity. Third party signage has therefore been restricted to ensure that it does not detract from the streetscape values and other special characteristics of Business Areas and indeed the City as a whole.

Limiting the size and type of signs will help maintain the appearance of Business Areas and other sensitive areas such as residential by ensuring that individual signs are not a dominant element of the townscape and that a cluttered sign environment will not result. Temporary signs are permitted because of their short term duration and that they have no lasting environmental effects.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Signs are a way of conveying information and marketing products. They play an important part of people's social, economic and cultural activities, and can contribute to people's health and safety. In some situations signs need to be designed and constructed to ensure they do not cause problems with public safety or visual clutter in the streetscape.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Ensuring signage is well integrated with the receiving environment helps to avoid, remedy and mitigate adverse effects, such as effects on the visual amenity of the host environment or the adjacent residential areas. Signs that are well integrated with the host building or site are less likely to compromise the visual quality of the surrounding environment.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Monitoring identified that signs in many areas were detracting from their appearance, even if the signs were compliant with current rules. If signs were installed to their permitted levels, there would be significant adverse effects generated. Accordingly, without a more focused objective signs will continue to detract from the city.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the proposed objective identifies signs are detracting from the appearance and amenity values in Business Areas and signals that signage needs to be more sensitive and better integrated with the built environment.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

It is considered that a more focused objective will make a difference in resolving the issue.

This objective enables signs to positively contribute to the city environment. In doing so, the objective is consistent with sections 7(c) and 7(f) of the Act in the way it seeks to maintain and enhance amenity values and the associated quality of the environment.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.8 To ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated.

Subdivision provides the structure and long term layout for future development; whether in the form of lots of land or the unit titling of a building. This objective is carried over from the existing Plan with no changes in recognition that managing subdivision in the Centres continues to be a necessary method of ‘maintaining and enhancing the quality of the built environment’.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act’s purpose
Enabling – social wellbeing	Ensuring that people have the necessary services and infrastructure to provide for their social and cultural wellbeing, and health and safety is an important part of achieving appropriate subdivision design. Enabling subdivision also helps people to provide for their economic wellbeing, for example, in adapting to a dynamic city environment where changes in land ownership and land uses occur frequently.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	The land use effects associated with subdivision need to be managed to ensure the natural and physical resources (i.e. land and infrastructure) are sustained and to ensuring the life-supporting capacity of specified resources are safeguarded (such as soil, vegetation and water). Avoiding, remedying and mitigating adverse effects of subdivision on the environment also enables people to provide for their health and safety (e.g. adequate stormwater and sewage connection, and water supply). The layout of new ‘green field’ subdivisions can also determine the efficiency of the local and wider transport network, and the compatibility with existing public transport networks.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

The land use effects associated with subdivision need to be managed to ensure the natural and physical resources are sustained and to ensuring the life-supporting capacity of specified resources are safeguarded. This objective allows Council to assess resource consent applications for subdivision and require that the adverse effects of new subdivisions are avoided, remedied or mitigated.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the proposed objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from poorly designed subdivision developments.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, the proposed objective focuses on ensuring that the potential adverse land use effects that can arise from poorly designed subdivision developments can be avoided, remedied or mitigated.

This objective is consistent with the purpose of the Act, which specifically seeks to avoid, remedy or mitigate any adverse effects of activities on the environment (s5(c)). Territorial authorities are responsible for the prevention or mitigation of any adverse effects of the subdivision of land (s31(1)(b)(ia)).

Objectives 1-3 of Chapter 14 in the RPS relate to the built environment and transportation, and subdivision patterns can be seen as a key aspect of that objective. Regard was also given to Objective 21 of the Proposed RPS which states that where development is proposed to be located beyond urban areas then the development should reinforce the region's existing urban form. Again, the way subdivision is managed will help to ensure that the existing urban form can be maintained.

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.9 Manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading and development of the electricity transmission network is not compromised.

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. In Wellington parts of the national grid pass over Business Areas. It is therefore important ensure that any new development, buildings and structures located near a high voltage transmission line do not compromise the ongoing operation, maintenance, upgrading and development of the national grid.

High voltage transmission lines can also generate potential adverse effects for surrounding land uses in the form of wind and corona discharge noise and potentially hazardous electromagnetic fields. In accordance with Policy 9 of the National Policy Statement on Electricity Transmission 2008 (NPSET), these are controlled by reference to the International Commission on Non-ionising Radiation Protection (ICNIRP) Guidelines.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	Managing development below the national grid will ensure the ongoing social and economic wellbeing of New Zealand and its people. It will also provide third parties with guidelines to protect their health and safety around and under high voltage electricity transmission lines.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	The national grid is a significant physical resource of the country. Careful management of activities and developments is required to avoid adverse reverse sensitivity effects and to sustain the resources for continued and future use.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Without this objective inappropriate development below and around high voltage electricity lines in the national grid are likely to occur, giving rise to adverse reverse sensitivity effects on the national grid and presenting adverse health and safety effects to activities on the ground.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, this policy relates directly to ensuring land based activities do not unduly impact on the national grid, and in turn are not harmed by the grid's potential adverse effects.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

Yes, if this objective is achieved the national grid will be able to function unhindered.

This objective is also consistent with Section 7 of the Act, which amongst other things requires Council to have particular regard to 7(b) the efficient use and development of natural and physical resources.

On the basis of the above, this objective is appropriate for achieving the purpose of the Act.

33.2.10 To maintain and enhance access to, and the quality of the coastal environment within and adjoining Business Areas.

The coastal environment is an important asset for Wellington, and Council is concerned that its qualities and character are not lost through inappropriate activities or development. Council aims to maintain and enhance the character and public amenity of, as well as public access to, the coastal environment by means of rules and strategies.

Elements that make up the purpose of the Act	Examination of the objective
Enabling – social wellbeing	<p>A quality environment benefits the social, economic and social wellbeing of people and communities. Natural assets, such as the coastal environment, need to be looked after so they can play their role in enabling sustainable outcomes.</p> <p>In addition, access to, and the quality of the coastal environment are considered to be factors that are important to people’s social and cultural wellbeing, and to their health and safety.</p> <p>People are able to provide for their economic wellbeing through use of the coastal environment – for example port activities.</p>
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	<p>The coastal environment has a life supporting capacity that can be affected by human activity. Managing adverse effects of activities alongside the coastal environment helps to protect its quality ensuring the natural resources are sustained and its associated life-supporting capacity is safeguarded.</p>
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Without this objective the coastal environment would be overlooked and the benefits it can provide society would be under threat.

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

This objective aims to manage the coastal environment, in particular, provide for public access to the coast.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The natural character of the coastal environment within and adjoining Business Areas is modified from historical reclamation, and port and wharf development. While the natural character of the environment is largely modified, there is scope to maintain and enhance its quality in appropriate ways. This includes providing access to the coast and opportunities for people to experience the harbour environment.

This objective is consistent with Section 6 of the Act which, amongst other things, requires, as a matter of national importance, the maintenance and enhancement of public access to and along the coastal marine area (6d), and the preservation of the natural character of the coastal environment...from inappropriate subdivision, use and development 6(a).

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.11 To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

The objective responds to a key issue identified in section 1.6.2 of the Plan which is to 'reduce risk' from both natural hazards (flood, earthquake etc) and technological hazards (such as electromagnetic radiation). Wellington experiences earthquake activity and other natural hazards, including flooding and landslips. This requires measures to reduce risks to acceptable levels.

Natural and technological hazards can create havoc on every day life through damaging property, infrastructure (including critical facilities), as well as causing loss of life and limb. Such phenomena can also result in substantial pollution of the physical environment, for example, through contamination of water resources.

One particular natural hazard risk for the Business Areas is the risk of flooding, especially in the Porirua and Takapu Stream catchments. The Wellington Hazard (fault line) area also runs through a small area of the southern part of Kaiwharawhara, and parts of some other Business Areas have been identified as being within ground shaking hazard areas. In addition, Council is monitoring the possible risks for the City associated with climate change and sea level rise.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	This objective helps to maintain people's economic, social and cultural wellbeing in times of hazardous events through avoiding undue loss of life, limb and possessions. Avoiding or mitigating adverse effects from natural or technological hazards on people, property and the environment provides for people's health and safety.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Natural and technological hazards pose a threat to people, property and the environment. Avoiding and mitigating the adverse effects of these hazards avoids undue environmental degradation during hazardous events, and contributes to sustaining the potential of natural and physical resources (including buildings) and safeguarding the life supporting capacity of specified resources (such as water) during such events.
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- ***What would happen without this objective?***

Land use and placement of buildings need to be managed to ensure that there is not undue loss of life and possessions in times of hazardous events. Avoiding or mitigating adverse effects from natural or technological hazards on people, property and the environment provides for people's health and safety and helps to maintain people's economic, social and cultural wellbeing.

- **Does this objective relate directly to the issue, and address a significant aspect of the issue?**

Yes, the objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from inappropriately located developments.

- **Would achieving the objective make a substantial difference in terms of resolving the issues?**

The objective is consistent with the territorial authority's function to avoid or mitigate natural hazards (s31(1)(b(i))). It is an appropriate way to protect people, property and the natural environment.

Most council strategies and policy documents seek to achieve a safer community, and this includes maintaining appropriate emergency management procedures (eg the Environment, Transport and Urban Development Strategies; 2006, and draft Long Term Council Community Plan, 2006/07-2015/16).

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.12 To prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal.

Hazardous substances pose a significant risk to human health and the natural environment. This objective seeks to reduce this risk.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Storage, use, disposal, or transportation of hazardous substances is part of the day to day environment of some of the Centres. This objective enables people to make use of hazardous substances in providing for their social, economic and cultural wellbeing, on the basis that every care is taken to prevent or mitigate any adverse effects.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Hazardous substances pose a threat to people and the environment. Preventing or mitigating the adverse effects of hazardous substances avoids environmental degradation, and contributes to sustaining the potential of natural and physical resources and safeguarding the life supporting capacity of specified resources (including air, water and soil).
Safeguarding life-supporting capacity	
Avoiding, remedying, or mitigating any adverse effects on the environment	

- **What would happen without this objective?**

Land use and placement of buildings or structures that store or accommodate hazardous substances need to be managed to ensure that there is not exposure to humans, or result in loss of life and possessions, or environmental degradation.

Avoiding or mitigating adverse effects from exposure to hazardous substances avoids undue risk to people, property and the environment, and contributes to sustaining the potential of natural and physical resources and safeguarding the life supporting capacity of specified resources (including air, water and soil).

- ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective relates directly to avoiding, remedying or mitigating potential adverse land use effects that can arise from inappropriately located developments.

- ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The objective is consistent with territorial authorities' function to prevent or mitigate any adverse effects of the storage, use, disposal or transportation of hazardous substances (s31(1)(b(ii) and (iia)).

On the basis of the above, this objective is **appropriate** for achieving the purpose of the Act.

33.2.13 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.

Tangata whenua with ancestral relationships with Wellington City have an important resource management role in the district. There are opportunities to foster this role. Maori concepts present a different view for the management of the City's natural and physical resources. In particular, kaitiakitanga is a specific concept of resource management. By acknowledging ancestral relationships with the land and natural world, a basis can be constructed for addressing modern forms of cultural activities.

Elements that make up the purpose of the Act	Examination of objective in meeting the Act's purpose
Enabling – social wellbeing	Enabling the exercise of tino rangatiratanga – or Maori sovereignty – helps to ensure that tangata whenua provide for their communities social, cultural and economic wellbeing, for example in the way natural and physical resources are managed. Enabling kaitiakitanga provides for tangata whenua to actively provide guardianship over natural and physical resources.
Enabling – economic wellbeing	
Enabling – cultural wellbeing	
Enabling – health and safety	
Sustaining the potential of natural and physical resources	Enabling the exercise of kaitiakitanga or guardianship helps to ensure that any adverse effects on the cultural conditions associated with the environment (including
Safeguarding life-supporting capacity	

Avoiding, remedying, or mitigating any adverse effects on the environment	<p>amenity values, natural and physical resources and ecosystems) are avoided, remedied or mitigated.</p> <p>Exercising kaitiakitanga contributes to sustaining the potential of natural and physical resources, and where relevant safeguarding the life-supporting capacity of specified resources.</p>
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• ***What would happen without this objective?***

Some of the principles of the RMA direct decision makers to think about Maori values, practices and interests. Decision makers must:

- recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (Section 6e)
- have particular regard to kaitiakitanga (Section 7a)
- take into account the principles of the Treaty of Waitangi (Section 8).

Without this objective, there would be inadequate policy direction for users of the Plan and decision makers to have particular regard for kaitiakitanga obligations of tangata whenua. Kaitiakitanga is defined in the RMA as meaning ‘the exercise of guardianship by the tangata whenua of an area in accordance with tikanga Maori in relation to natural and physical resources; and includes the ethic of stewardship’

• ***Does this objective relate directly to the issue, and address a significant aspect of the issue?***

Yes, the objective relates directly to facilitating and enabling Wellington's tangata whenua and other Maori to the exercise of tino rangatiratanga and kaitiakitanga when managing natural and physical resources.

• ***Would achieving the objective make a substantial difference in terms of resolving the issues?***

The principles of the Treaty include, amongst other things, the duty to provide information in a timely manner, and to maintain an open mind in decision making.

An important part of any relationship of tangata whenua with ancestral areas is tino rangatiratanga or Maori sovereignty. Although tino rangatiratanga naturally links back to the people with manawhenua over the area or rohe, there is also a role for other Maori to maintain their cultural wellbeing, for example, in establishing and operating kohanga reo.

Part F Appropriateness of policies, methods and rules for Business Areas

The evaluations in the following sections consider the extent to which the proposed policies, methods and rules for the Business Areas zone are the most appropriate for achieving the District Plan’s objectives.

The appropriateness of existing provisions was considered at the time of being included in the ‘first generation’ District Plan (in 1994). Implementation and monitoring of the District Plan has not indicated any notable deficiencies with these provisions. Therefore, any existing provisions that are not proposed to be changed will not be re-evaluated.

The District Plan has adopted a rule-based regime for implementing policies, based on compliance with environmental standards. This approach has been thoroughly considered though the plan preparation, submission and hearing process when the operative District Plan was originally notified. It has operated for over 10 years relatively successfully so it is not proposed to reconsider the merits of this approach.

Section 32 of the Act requires the appropriateness of the proposed policies, methods or rules to be examined in terms of achieving the objectives of the District Plan. In examining the policies and methods, regard should be had to their effectiveness and efficiency. The benefits, costs and relevant risks associated with the provisions are also examined.

For your guidance – structure of Part F:

1. **The following analysis of provisions is structured around each objective** (which is highlighted in a grey shaded box at the beginning of each section). The numbering of the objectives reflects the numbering in Proposed District Plan Change 73.
2. The set of policies and methods proposed to achieve each objective is listed in a white box under the objective at the beginning of each section.
3. An analysis of each group of policies and methods proposed to achieve the relevant objective follows on under each objective.

17. Role and Function of Business Areas

33.2.1 To provide Business Areas that can accommodate a wide range of business and industrial activities to meet the social and economic needs of the City.

17.1 Proposed Policies and Methods

- | | |
|----------|--|
| 33.2.1.1 | Recognise and provide for both Business 1 and Business 2 Areas within the City. |
| 33.2.1.2 | Enable the outward expansion of existing, or the creation of new areas for business and industrial activities, where they: <ul style="list-style-type: none"> • are compatible with adjoining landuses; and • do not undermine existing investment in infrastructure (including water, stormwater, sanitary sewer, roads and footpaths); and |

- are accessible from the roading network without generating more than minor adverse effects on the roading network and the hierarchy of roads (Maps 33 and 34) from potential trip patterns, travel demand or car use; and
- are designed to cater primarily for industrial and business activities.

33.2.1.3 Promote the viability and vibrancy of Regionally Significant Centres in the Wellington region.

METHODS

- Planning Maps
- Rules
- WCC Centres Policy
- Proposed Regional Policy Statement for the Wellington Region 2009
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)
- Master Planning, Structure Planning, Concept Plans
- Annual Plan
- Long Term Council Community Plan
- Advocacy
- Plan Changes

17.2 Background

The Business zone, amongst other things, has been created in response to the issue of loss of industrial land. This has been a notable trend in the period from 1995-2009 and resulted from the move of residential and retail activities into areas previously dominated by commercial and industrial uses. This has provided a greater mix in some areas, but it can make it difficult for activities and businesses to find land and premises within the city boundaries.

The Business Area chapter of the District Plan recognises these changing circumstances and provides a balanced approach to the management of activities and their effects. The philosophy of enabling and providing flexibility has been retained, together with tailor-made provisions that foster the diversity of Business Areas.

Two Business Area sub-zones are identified which recognise the different environments created by predominantly commercial-type activity. The Business 1 and Business 2 Areas are characterised as follows:

▪ Business 1 Areas

Contain a range of uses including: employment activities, light industrial, commercial and business services, recreational, residential and entertainment uses, and local community services. In some cases retail activities are also appropriate.

▪ Business 2 Areas

Traditional business areas where a range of industrial activities including warehousing, manufacturing and commercial services can occur. Because of the industrial nature of the activities in such areas, lower levels of amenity are acceptable compared with other areas in the City. Residential and retail activities are not encouraged in Business 2 Areas.

Ideally, new business and industrial activities should locate within established Business Areas. This is a sustainable use of City's existing built environment,

infrastructure and transport resources, and builds on the District Plan’s overarching goal of maintaining a sustainable compact urban form.

However, given the shortage of such land within the City, Council does recognise that new activities may need to locate on the fringe of already established areas or in entirely new locations. When Council is considering applications for new or expanded Business Areas, factors such as compatibility with adjoining landuses, accessibility to the road hierarchy and transport links, and whether the proposals are designed to cater primarily for industrial and business activities will be taken into account.

17.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres Review.

Table 6: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Business Areas			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the current market-orientated District Plan provisions in relation to Suburban Centres.</i> This option is not recommended.</p>	<p>Encourages a wide range of activities to occur throughout the city and enables the city to respond to changing market demands.</p>	<p>Low implementation costs.</p>	<p>Most activities are able to occur across the existing Suburban Centres-zoned land, thus threatening the remaining industrial land supply and also the sustainable management and viability of centres.</p>
<p>Option 2 – proposed policy provisions of the Suburban Centres draft Plan Change. <ul style="list-style-type: none"> • <i>Introduce two new sub-zones: Live/Work Area and Work Area.</i> This option is not recommended.</p>	<p>The centres hierarchy would be fairly strictly followed, thus the Centres Policy implemented.</p> <p>Managing the city’s infrastructure is recognised as being key to sustainable management.</p> <p>This option would involve a relatively high level of land use regulation, particularly with regard to retail activities, with rules identifying what activities</p>	<p>This direction would be in line with the Regional Policy Statement, Urban Development Strategy and Centres Policy.</p> <p>There would be a high level of direction over the location of land uses thus making it easier for Council to make strategic decisions on growth and plan for appropriate levels of infrastructure to support centres.</p> <p>A compact urban form is a sustainable option in promoting development options for the City.</p>	<p>Costly to implement due to the high regulatory nature of the provisions relating to high use of land use controls and the appropriateness of activities for both the Live/Work and Work Areas.</p> <p>Likely to encounter interpretational difficulties over the introduction of definitions.</p> <p>There would be reduced capacity for the market to play a role in determining the appropriate location of different scale activities.</p>

Table 6: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Business Areas			
Option	Key Features	Advantages	Costs and Risks
	<p>could occur in both the Live/Work and Work Areas.</p> <p>The introduction of many definitions used to categorise different land use activities.</p> <p>A compact urban form would be promoted.</p>		<p>Unlikely to be palatable to the development community and land owners who opposed these relatively tight provisions as they were proposed in the <i>draft</i> plan change. Costly appeals would therefore likely follow District Plan hearings.</p>
<p>Option 3 – proposed new policy provisions</p> <ul style="list-style-type: none"> • <i>Identify ‘Business 1’ and ‘Business 2’ Areas in a separate zone and introduce provisions that recognise the importance of land suitable for industrial and business activities.</i> • <i>Allow for the expansion of existing or the creation of new areas for business and industrial</i> 	<p>This option would focus on promoting the spatial form benefits of the centres hierarchy whilst promoting a low level of land use regulation.</p> <p>Managing the City’s infrastructure is recognised as being key to sustainable management.</p> <p>Two separate Business Areas are identified to provide mixed-use areas where people can live and work, but with fewer day-to-day conveniences for residents than may be</p>	<p>The provision of Business 1 and 2 Areas will help in the retention of a sufficient supply of land available for industrial and business activities to meet the economic and social needs of the City.</p> <p>Allowing existing Business Areas to expand or the creation of new areas primarily for business and industrial activities will enable industrial and business activities to continue to grow and therefore contribute to the economic needs of the City.</p> <p>A compact urban form will be promoted which is in line with the Proposed Regional Policy Statement, Urban Development Strategy and Centres Policy.</p>	<p>There may be some disparity with market direction for land use activities and maintaining the sustainable urban form promoted by the Centres Policy and Urban Development Strategy.</p> <p>Business and employment land will remain under some pressure to be developed and used for residential, retail and leisure activities instead within Business 1 Areas.</p> <p>Some aspects of proposed rules may remain unpalatable to some land owners and developers.</p>

Table 6: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Role and Function of Business Areas

Option	Key Features	Advantages	Costs and Risks
<p><i>activities so long as any new Business Area is shown to be a sustainable option through meeting a set of criteria.</i></p> <ul style="list-style-type: none"> <i>Promote the viability and vibrancy of Regionally Significant Centres in the Wellington region.</i> <p>This option is recommended.</p>	<p>available in Centres (Business 1 Areas); and areas for industrial and business activities (Business 2 Areas).</p> <p>A compact urban form would be promoted.</p>		

17.4 Background Documents

- District Plan Change 52 – Suburban Centre rule amendments
- District Plan Change 66 – Amendments to Suburban Centre provisions and associated definitions
- Urban Development Strategy 2006
- Centres Policy 2008
- Long Term Council Community Plan
- Wellington Regional Strategy
- Greater Wellington Regional Policy Statement
- The proposed Regional Policy Statement for the Wellington region

18. Activities

33.2.2 To enable an appropriate range of activities to occur in Business Areas, provided they do not undermine the City’s Centres, and that adverse effects are avoided, remedied or mitigated.

18.1 Proposed Policies and Methods

Range of activities

33.2.2.1 Maintain a mixed use character in Business 1 Areas by allowing a range of activities to establish provided that character and amenity standards are maintained and any potential adverse effects are able to be satisfactorily avoided, remedied or mitigated.

33.2.2.2 Enable business and industrial activities and specified retail activities within Business 2 Areas provided that character and amenity standards of adjoining Residential Areas are maintained, and that any potential adverse effects can be satisfactorily avoided, remedied or mitigated.

33.2.2.3 Ensure the retention of suitable land for industrial and business activities, by restricting the establishment of non-industrial activities, specifically residential and some retail activities, in Business 2 Areas.

Retail activities

33.2.2.4 Control the establishment of large integrated retail developments and large supermarket developments in Business 1 Areas. Such activities will only be permitted to located in Business 1 Areas if it can be demonstrated that they will:

- not result in significant adverse cumulative impacts on the viability and vitality of the Golden Mile; and
- not result in significant adverse cumulative impacts on the viability and vitality of any Sub-Regional, Town or District Centre; and
- not undermine existing investment in infrastructure (including water, stormwater, sanitary sewer, roads and footpaths, and community facilities) in the Golden Mile or any Sub-Regional, Town or District Centre; and
- will not result in significant adverse impacts on the sustainability of the transport network; and
- will not result in significant adverse impacts on the roading network and the hierarchy of roads (see Map 33) from trip patterns, travel demand or vehicle use, and
- be compatible with adjoining landuses.

33.2.2.5 Restrict the establishment of retail activities smaller than 450m² gross floor area in the Tawa South and Takapu Island Business Areas to ensure they will:

- not result in significant adverse cumulative impacts on the viability and vitality of the Tawa Town Centre; and
- not undermine existing investment in infrastructure

(including water, stormwater, sanitary sewer, roads and footpaths, and community facilities) in Tawa Town Centre.

33.2.2.6 Restrict the establishment of all retail activities in Business 2 Areas to:

- **trade supply retail**
- **wholesalers**
- **service retail**
- **ancillary retail, and**
- **yard-based retail activities**

in order to maintain industrial land availability and the viability and vitality of Centres.

Kiwi Point Quarry

33.2.2.7 Provide for the development and site rehabilitation of the Kiwi Point Quarry to the extent specified in the Plan in a way that avoids, mitigates or remedies adverse effects.

Temporary Activities

33.2.2.8 Provide for temporary activities that contribute to the social, economic and cultural wellbeing of the community, whilst controlling any adverse effects in a manner that acknowledges their infrequent nature and limited duration.

Noise

33.2.2.9 Control the adverse effects of noise within all Business Areas.

33.2.2.10 Allow residential development in Business 1 Areas so long as it does not constrain established or permitted activities from reverse sensitivity through noise.

33.2.2.11 Ensure that appropriate on-site measures are taken to attenuate intrusive noise effects in Business 1 Areas to protect noise sensitive activities.

33.2.2.12 Require that noise sensitive activities and buildings in the Business 1 Areas of Miramar South, Ropa Lane and Kilbirnie North within the Wellington International Air Noise Boundary identified on planning Map 35, be insulated from airport noise.

33.2.2.13 Require that noise sensitive activities and buildings in the Business 1 Areas of Ropa Lane and Kaiwharawhara within the Outer Port Noise Affected Area and the Inner Port Noise Affected Area on planning Map 55, be insulated from port noise.

33.2.2.14 Discourage noise sensitive activities from establishing in Business 2 Areas to avoid issues of reverse sensitivity affecting industrial or business activities.

Environmental issues

33.2.2.15 Ensure that activities creating effects of lighting, dust and the discharge of any contaminants are managed to avoid, remedy or mitigate adverse effects on other activities within Business Areas or in nearby Residential or Open Space Areas.

33.2.2.16 Avoid adverse effects from activities listed under the Third Schedule of the Health Act.

METHODS

- Rules
- Planning Maps
- WCC Centres Policy
- WCC operational activities (Urban Development Strategy& Growth Spine Concept, Economic Development Strategy (2006), Transport Strategy)
- Other mechanisms (the Wellington Regional Strategy and the Proposed Regional Policy Statement for the Wellington Region 2009)
- New Zealand Transport Agency operational activities as a road controlling authority
- Design Guide (Business)
- WRC operational activities for the proposed Takapu Island park and ride facility

Noise:

- Other mechanisms (abatement notices, enforcement orders)
- Application of the New Zealand Acoustic Assessment and Measurement Standards
- Section 16 of the Act (Duty to avoid unreasonable noise)
- Local Government Act

Quarry:

- Rules (including Appendix 2 showing the extent of quarry areas)
- A quarry management plan

18.2 Background

The Suburban Centres review has highlighted the importance of maintaining areas within the city where industrial activities can establish and function without undue constraint or competition from other, incompatible, activities. At the same time Business Areas need to maintain some flexibility around land uses in order to respond to the market and changing economic conditions. Further issues arise around the recognition now given to Centres, their important economic and social roles and the need to ensure these resources are not threatened by out-of-centre developments. Balancing out all these land use pressures requires a mix of flexibility with a measure of direction and guidance around activities that will most likely lead to unsustainable land use patterns or generate adverse effects.

The aim of the proposed provisions is to allow land uses that will enhance the mixed-use character of Business 1 Areas, and the more business and industrial character of the Business 2 Areas.

18.3 Retail Activities

Retail has been identified as an activity that has the potential to disrupt the sustainable land use patterns and compact form of the City, and generate significant adverse effects on roading and other infrastructural investments. At the same time a mixed-use area, by its very nature, requires a mixture of retail activities of all types and sizes. The proposed provisions therefore only seek to curtail the larger types of retail activities that have the potential to undermine Centres, disrupt the compact urban form of the City or generate significant adverse effects on infrastructure. Three types of retail have been identified:

- supermarkets over 1500m² in area; and

- large integrated retail developments, comprising large-format retail, over 10,000m² in area; and
- integrated retail developments comprising any other retail apart from large format retail, over 2,500m² in area.

Additionally, Officers undertook a risk analysis, and Tawa South and Takapu Island were identified as having a greater potential risk of adversely affecting the viability and vibrancy of the Tawa Town Centre, should any number of small-scale retail outlets establish. For this reason any retail activity smaller than 450m² in area is restricted in these locations.

Retail activities establishing in out-of-centre locations has also been identified as one of the lead causes for eroding the industrial land base of the city. The proposed provisions will curtail most retail activities from the Business 2 areas, allowing only those retail activities that have an industrial character about them.

18.4 Adverse Effects

The operative District Plan uses rules and standards to control the adverse effects from activities. This approach is well tested and accepted and will be maintained in the Business Areas zone as the key method of dealing with adverse effects.

Reverse sensitivity has emerged as a result of more sensitive activities, such as residential activities, establishing in traditionally industrial locations, making it difficult for industrial activities to comfortably establish and operate without being threatened by incompatible land uses. The main concerns are with residential and other 'noise sensitive activities' being sensitive to environmental emissions and noise from industrial activities. Due to the need to ensure a long term supply of land for industrial uses, it is no longer acceptable that noise sensitive activities are able to establish in Business 2 Areas.

Reverse sensitivity is also an issue in Business Areas where not all activities will be strictly compatible with residential activities. Here, rules and standards can require noise sensitive activities to protect themselves against other existing and permitted land uses. This approach has been adopted into the Central Area with good effect, and the same provisions are proposed to be introduced in Business 1 Areas.

Temporary activities, such as outdoor concerts, parades, sporting events and cultural festivals, make an important contribution to the vibrancy and vitality of Wellington City as a whole. Unlike other key chapters of the Plan such as Central Area, temporary activities in the former Suburban Centres zoning are required to comply with all activity standards, which generally gives rise to the need for a resource consent due to temporary activities struggling to comply with the noise standards.

In the Residential, Rural and Open Space zones temporary activities are not subject to the noise standards. Instead the potential adverse effects of temporary activities are managed using section 16 of the Act (duty to avoid unreasonable noise) and section 17 (duty to avoid, remedy or mitigate adverse effects). It would be more efficient if similar provisions also applied to temporary activities in Business Areas.

18.5 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres Review.

Table 7: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p><i>Retain the current District Plan provisions in relation to land use controls. These include District Plan Change 52, which introduced the need for resource consent for retail activities 500m² or more in floor area.</i></p> <p>This option is not recommended.</p>	<p>Encourages a wide range of activities to occur throughout the city and enables the city to respond to changing market demands.</p> <p>Controls the establishment of large format retail activities and the potential effects they might have on Sub-Regional, Town and District Centres.</p>	<p>Low implementation costs due to low regulatory nature of the provisions.</p> <p>Introduces controls for larger retail activities and assessment criteria aimed at supporting a compact urban form and sustainability of existing Centres.</p>	<p>Activities are able to occur both within and in out of centre locations, thus threatening the sustainable management and viability of Centres.</p> <p>Loss of industrial land where residential and retail activities have been allowed to establish in traditional industrial areas.</p> <p>These provisions do not sufficiently promote the intensification of activities in Centres, and are therefore not particularly conducive to achieving the Urban Development Strategy; and are not in wholly keeping with the Proposed Regional Policy Statement or the Wellington Regional Strategy.</p>
<p>Option 2 – new provisions introducing policies and rules as proposed in the draft suburban Centres plan change.</p> <ul style="list-style-type: none"> • Allow a broad range of activities 	<p>A broad range of appropriate activities would be allowed however there would be a high degree of control over retail activities.</p> <p>This option would involve a relatively high level of land use regulation, particularly with regard to retail</p>	<p>Allows a broad range of activities, apart from controls over retailing. The degree of regulation is moderate.</p> <p>Adverse effects of permitted activities in Business Areas are managed, and effects from inappropriate activities avoided.</p> <p>Supports intensification of activities in Centres, in keeping with the Urban</p>	<p>Having several categories of retail activities would lead to interpretational issues with definitions, making plan provisions difficult and inefficient to implement and potentially increasing the number of resource consents to be processed.</p> <p>Strict controls around retailing was not well received by stakeholders, and</p>

Table 7: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<p><i>though tightly manage retail activities so that in both Live/Work and Work Areas, they are of an appropriate size and scale relative to the Area's' place in the centres hierarchy.</i></p> <ul style="list-style-type: none"> • <i>Manage adverse effects generated by noise, lightening and other emissions.</i> <p>This option is not recommended.</p>	<p>activities, with rules identifying what activities could occur in both the Live/Work and Work Areas. Standards used to control and manage adverse effects from permitted and restricted discretionary activities.</p> <p>Introduces a number of new definitions to categorise retail activities.</p>	<p>Development Strategy, Regional Policy Statement and Wellington Regional Strategy.</p>	<p>therefore this option could be associated with a high risk of appeal.</p>
<p>Option 3 – proposed new policy provisions</p> <ul style="list-style-type: none"> • <i>Allow a broad range of land use activities in Business 1 Areas though manage the potential effects from large scale integrated retail activities and large supermarkets.</i> 	<p>A broad range of activities allowed in Business 1 Areas, however there would be a high degree of control over large integrated retail activities and large supermarkets, both managed as a Discretionary Activity (Unrestricted).</p> <p>A broad range of industrial and specific retail activities</p>	<p>Cost-effective and efficient to implement as the most activities are permitted in Business 1 Areas and with complementary activities permitted in Business 2 Areas.</p> <p>There would be a moderate level of direction over the location of specific land uses. However, having a business focused zoning and rules can encourage mixed-use and other complementary activities to locate in Business Areas which can result in economic clustering benefits.</p>	<p>Business-focused zone and rules may reduce the influence which the market has over deciding where different land uses should locate.</p> <p>Business and employment land will remain under some pressure to be developed and used for residential, retail and leisure activities instead within Business 1 Areas.</p> <p>Some aspects of proposed rules may</p>

Table 7: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Activities			
Option	Key Features	Advantages	Costs and Risks
<ul style="list-style-type: none"> • <i>Allow a broad range of industrial activities and specified retail activities within Business 2 Areas.</i> • <i>Restrict the establishment of non-industrial activities, specifically residential and some retail activities in Business 2 Areas.</i> • <i>Manage adverse effects generated by noise, lightening and other emissions.</i> <p>This option is recommended.</p>	<p>allowed in Business 2 Areas, with non-industrial activities restricted from establishing in these Areas.</p> <p>Standards used to control and manage adverse effects from permitted and restricted discretionary activities.</p> <p>Noise sensitive areas within the Airport Air Noise Boundary, Port Noise Affected Area and Business 2 Areas will be discouraged.</p>	<p>Adverse effects of permitted activities in Business Areas are managed and effects from inappropriate activities avoided.</p> <p>Low implementation costs due to low-moderate levels of land use regulation.</p>	<p>remain unpalatable to some land owners and developers.</p>

18.6 Background Documents

- District Plan Change 52 – Suburban Centre rule amendments
- District Plan Change 66 – Amendments to Suburban Centre provisions and associated definitions
- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008
- Urban Development Strategy 2006
- Centres Policy 2008
- Long Term Council Community Plan

- Wellington Regional Strategy
- Greater Wellington Regional Policy Statement
- Proposed Regional Policy Statement for the Wellington region 2009
- Nigel Lloyd, Acousafe Consulting and Engineering Ltd, 5 January 2006, Suburban Centres Noise Provisions for Wellington City Council, N1323
- Auckland Regional Council, 16 November 2006, Ensuring Liveable Quality Apartments in the Auckland Region: Discussion of issues to be addressed in the review of the NZ Building Code
- *Suburban Centres Review – Retail Threshold and Definition Assessment*

19. Business Precincts

33.2.3 To recognise where unique development opportunity areas exist within Business Areas and encourage redevelopment of these in a manner that is compatible with, and enhances amenity values and contribute to the City’s distinctive physical character, sense of place and contained urban form.

19.1 Proposed Policies and Methods

33.2.3.1 Ensure that any new development at Shelly Bay generally reflects the heritage and landscape character of the area and has regard to the site’s special coastal location.

33.2.3.2 Provide for the comprehensive development and redevelopment of those Business Areas which display unique development opportunities through a concept, master or structure plan process.

METHODS

- Rules
- Design Guide (Shelly Bay)
- Operational activities (management of infrastructure including through the WCC Centres Policy 2008 and Long Term Council Community Plan)
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)
- Northern Growth Management Framework
- Master Planning
- Concept Plans (including plans and accompanying text)
- Structure Plans
- Advocacy
- Memorandums of Understanding with land owners

19.2 Background

Shelly Bay is a highly visible area covering the former Defence Force military site. Aside from a few different activities that make use of the existing buildings on site, Shelly Bay has been largely unoccupied since the Defence Force ceased operations at the location.

Development on the site is characterised by a collection of individual buildings of one or two storeys above ground level – most of which have important historical associations with its military and maritime past. It is Council’s intention that any re/development at Shelly Bay should reflect the character of established development on both sides of the main road through the site, and provide for a pedestrian promenade along the water’s edge..

To get the most from the site it is recognised that special provisions will be required. It is Councils intention to work with future landowners to ensure that any redevelopment of the area recognises the heritage values on site. The Council will also seek to ensure that harbour views to the site are not compromised and that redevelopment respects its coastal location.

The aim of these policies is to ensure that Shelly Bay and other potential brownfield opportunities that arise in the City are developed to their full potential.

19.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres Review.

Table 8: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Business Precincts			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the operative District Plan provisions relating to development at Shelly Bay</i></p> <p>This option is not recommended.</p>	<p>Ensures that any new development at Shelly Bay reflects the quality and character of the area and has regard to the site's special coastal location.</p>	<p>Recognises and provides for development at Shelly Bay in a manner that reflects the character and the sensitive nature if the site between the sea and the open space of the Miramar headland.</p>	<p>The operative provisions do not recognise other areas where there may be unique development opportunities.</p>
<p>Option 2 – proposed new policy provisions <i>Strengthen the policies relating to unique development opportunity areas</i></p> <p>This option is recommended.</p>	<p>Ensures that any new development at Shelly Bay reflects the heritage and landscape character of the area and has regard to the site's special coastal location</p> <p>Provides for the comprehensive redevelopment of other Business Areas which display unique development opportunities through a master plan process.</p>	<p>The recognition of areas that have unique development opportunities will enable any development in these areas to be undertaken in a comprehensive manner that that maximises benefits to the wider community.</p> <p>Use of master/structure/concept plans helps to shape opportunities for Council and other stakeholders to invest in the revitalisation of Business Areas with special development opportunities.</p>	<p>The requirement to undertake a master/structure/concept planning exercise may impose additional cost onto developers.</p>

19.4 Background Documents

- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008

20. Built Development, Urban Design and Public Space

- 33.2.4 To ensure that activities and developments at least maintain the amenity values and public safety of Business Areas and those of any other nearby Centres, Residential, Open Space or Rural Areas.**

20.1 Proposed Policies and Methods

Design Guidance

- 33.2.4.1 Ensure that buildings, structures and spaces in Business 1 Areas are designed to:**
- Acknowledge and respect the form and scale of the surrounding environment in which they are located, and
 - Respect the context, setting and streetscape values of adjacent listed heritage items and Heritage Areas; and
 - Establish positive visual effects, and
 - Provide good quality living and working environments, and
 - Provide conditions of safety and accessibility, including for people with restricted mobility.
- 33.2.4.2 Ensure that buildings, structures and spaces in Business 2 Areas that are visible from a state highway are designed to establish positive visual effects including building articulation and visual interest appropriate to viewer distance and viewing speed.**
- 33.2.4.3 Encourage developments in Business 1 Areas to create an attractive, comfortable and clear street environment including aspects such as shelter/ verandahs, lighting, street furniture and landscaping.**
- 33.2.4.4 Maintain and enhance the streetscape of Business 1 Areas by managing the location and design of land dedicated to outdoor storage and car parking.**
- 33.2.4.5 Maintain and enhance the streetscape of Business 1 Areas by controlling the siting and design of structures on or over roads.**

Residential development

- 33.2.4.6 Allow residential development in Business 1 Areas where it utilises upper floors of buildings and provides a secure and pleasant environment for the occupiers.**
- 33.2.4.7 Enhance the quality and amenity of residential buildings in Business 1 Areas by guiding their design to ensure current and future occupants have an adequate standard of amenity and appropriate access to daylight and an awareness of the outside environment.**

Zone interfaces

- 33.2.4.8 Ensure an appropriate transition between activities and**

buildings within Business Areas and adjoining Centres and Residential Areas.

Building height, bulk and location

33.2.4.9 Manage the height, bulk and location of buildings and developments in Business 1 Areas so that they avoid, remedy or mitigate the adverse effects of shading, loss of daylight, privacy, scale and dominance and any other adverse effects on amenity values within Business Areas and on adjoining Centres and Residential Areas.

Health, safety and security

33.2.4.10 Ensure that all spaces accessed by the public are safe and are designed to minimise the opportunities for crime.

METHODS

- Rules
- Design Guides (for Centres and Residential Activities).
- Other mechanisms (New Zealand Urban Design Protocol, Advocacy)
- Urban Development Strategy

20.2 Background

Business Areas are often more utilitarian by character and do not warrant the same level of concern for urban design or assessment of the built environment. The expectation is that the level of amenity value does not need to be of the same high standard as you would expect in the Centres or Central Area. However, because Business 1 areas will cater for mixed uses, including residential activities, there does need to be a level of appreciation for the built environment. Other the other hand, Business 2 Areas are more industrial in character and therefore in most cases will not warrant the same level of design assessment.

Urban design assessments will be required in the Business 1 Area for all buildings or additions that exceed 500m² (in total gross floor area). In such cases, Council will look at the design, external appearance and siting of the new building, the location and type of buildings or structures, site layout, parking and site access, pedestrian accessibility and landscaping.

The only instances where design assessment will be required in Business 2 Areas will be when a proposed building is over 4000m² or when they are abutting or adjacent to the State Highway, or near to more sensitive receiving environments such as Residential. This figure is based on Officer analysis of building footprint sizes in Business 2 Areas.

The proposed provisions are designed to maintain an appropriate level of amenity value in Business 1 areas, whilst only being concerned with Business 2 areas where they might affect a more sensitive receiving environment adjoining or visually prominent sites.

20.3 Methods

The approach in the operative District Plan for controlling effects from buildings through building bulk and location rules and standards is well established, accepted and will be maintained.

In some areas monitoring has identified where additional building height can be accommodated without unduly compromising amenity values for neighbouring properties or the wider cityscape. Where possible, therefore, additional building height is proposed.

In Business 1 Areas, where the need to maintain a certain level of amenity has been identified, policy guidance is proposed to deal with situations where building bulk and location is proposed to exceed standards. In Business 2 Areas, it has been identified that larger bulkier buildings that are prominent from public spaces such as highways tend to create the greatest effect. Additional policy guidance and improved provisions have therefore been proposed to address this issue.

Monitoring has also identified that there are issues at zone interfaces where the amenity values of more sensitive receiving environments are not being sufficiently maintained. Additional policy guidance and improved standards have therefore been proposed to address this issue.

20.4 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 9: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo <i>Retain the current District Plan provisions in relation to land use and building controls.</i></p> <p>This option is not recommended.</p>	<p>All built development is encouraged and only those proposals breaching bulk and location standards require resource consent.</p> <p>There is a uniform 12m height limit across the zone.</p>	<p>Low implementation costs as there are few triggers for requiring resource consent.</p>	<p>The urban design qualities of the built environment may not improve, and this in turn may detract from Wellington and its appeal to visitors and investors.</p> <p>Poorly designed buildings that do not complement or adequately consider their visual effect on neighbouring areas or public places may continue to be constructed.</p> <p>The urban design qualities along the state highway may not improve, potentially creating a negative impression to the City's urban gateways.</p>
<p>Option 2 – existing provisions proposed under plan change 52 <i>Buildings over 500m² in floor area require a resource consent.</i></p> <p>This option is not recommended.</p>	<p>Introduces the need for design guidance for larger buildings.</p>	<p>Low implementation costs as there are relatively few large building proposals that would trigger the need for resource consent and design assessment.</p>	<p>Not only larger buildings impact on the public environment and the urban design qualities of the built environment, but medium scale buildings can also adversely impact on Business Areas appearance and sense of place. This coupled with potential cumulative effects from smaller developments and changes to buildings that can have significant adverse effects on the streetscape of Business Areas.</p>

Table 9: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space			
Option	Key Features	Advantages	Costs and Risks
			These provisions are largely ineffective in dealing with the identified issues and will not deliver improved quality to the built environment.
<p>Option 3 – proposed new provisions</p> <ul style="list-style-type: none"> • <i>Developments over 500m² in Business 1 Areas will be made a Restricted Discretionary Activity to be assessed against a newly introduced Design Guide.</i> • <i>Developments over 4000m² or abutting or adjacent to a state highway in Business 2 Areas will be made a Restricted Discretionary Activity to be assessed against a newly introduced</i> 	<p>The introduction of a Business Design Guide for new development that breach the relevant rule. (NB: The Residential Design Guide is to be used to assess residential development in new or converted buildings in Business 1 Areas).</p> <p>Standards will be used to control building height, building set-backs from Centres and Residential Areas, noise insulation and ventilation for residential activities (in Business 1 Areas), noise insulation in the port noise affected area.</p>	<p>Design guidance will improve the quality of the built environment, from building design to site layout, making Centres more attractive places in which to be.</p> <p>Wellington’s sense of place will be maintained and enhanced through managing the characteristics that define and Wellington’s unique identity.</p> <p>Improved residential developments will deliver higher amenity standards for residents, making them a better long term prospect for Business 1 Areas.</p> <p>The Residential and Central Area chapters use Design Guidance, and these methods for managing outcomes in the built environment are well accepted. The development community is generally accustomed to working with these types provisions. Giving effect to these new rules and design guides should therefore be relatively efficient.</p>	<p>This option will generate the need for more resource consents and therefore increase the costs of implementing the Plan.</p>

Table 9: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Built Development, Urban Form and Public Space

Option	Key Features	Advantages	Costs and Risks
<p><i>Design Guide</i></p> <ul style="list-style-type: none"> • <i>Make residential development a Restricted Discretionary Activity in Business 1 Areas and introduce Design Guides for assessment.</i> • <i>Require noise insulation for residential developments.</i> • <i>Tighten building bulk and location provisions at zone interfaces.</i> <p>This option is recommended.</p>			

20.5 Background Documents

- Wellington City District Plan Monitoring Report, Wellington's Suburban Centres 2007/2008
- District Plan Change 52
- Central Area Design Guide
- Residential Area Design Guide

- Urban Development Strategy, 2006
- Greater Wellington Regional Policy Statement
- Wellington Regional Strategy
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Ministry of Justice (2005) – National Guidelines for Crime Prevention through Environmental Design in New Zealand

21. *Building Efficiency and Sustainability*

33.2.5 To promote energy efficiency and environmental sustainability in new building design.

21.1 Proposed Policies and Methods

33.2.5.1 Promote a sustainable built environment in Business Areas, involving the efficient end use of energy and other natural and physical resources and the use of renewable energy, especially in the design and use of new buildings and structures.

33.2.5.2 Ensure all new buildings provide appropriate levels of natural light to occupied spaces within the building.

METHODS

- Other mechanisms (Advocacy of Environmentally Sustainable Design principles, Education)
- Design Guides

21.2 Background

New building works are users of natural and physical resources that can have adverse effects on the environment (including cumulative effects) for example, through high rates of water use or electricity consumption. Opportunities to incorporate sustainable building design features and to use sustainable building methods will be encouraged to minimise potential adverse environmental effects. A development that proposes an environmentally sustainable designed building will be viewed as having a positive effect of the proposal on the environment.

Because sustainable building design involves the site-specific context and function of the building, the options for taking up different design features and methods will vary from case to case. With respect to Centres this may be in the form of new development incorporating sustainable and energy efficient building design principles, and the use of renewable energy sources for space and water heating, and electricity generation. This may involve more simple energy efficiency design principles such as correct building orientation to the sun, to assist in passive solar heating, cooling and natural lighting. Many of these activities may not require resource consent, but the Council recognises its responsibility in terms of role model and advocate to encourage the use of renewable energy and energy efficiency.

Ongoing developments in the technology and information about sustainable building design mean that options for this type of approach are likely to evolve over the life of the Plan. Accordingly, the Council will look to other research and industry organisations for guidance on the latest technology, methods and tools to achieve environmentally sustainable buildings.

Making provision for natural light to all habitable and high use areas of new buildings will help to reduce the on-going energy requirements of new buildings as well as provide more comfortable living environments for occupants.

Many matters relating to sustainable building design are addressed by the minimum standards outlined in the Building Act 2004 (specifically the Building Code). However, where it is practicable, sustainable building design and associated methods that go beyond the minimum standards of the Building Code will be promoted.

22. Access and Transport

33.2.6 To maintain an efficient and sustainable transport network that provides convenient and safe access for people and goods to and within Business Areas.

22.1 Proposed Policies and Methods

Multiple transport modes

33.2.6.1 Ensure that activities and developments are designed to be accessible by multiple transport modes.

Managing adverse effects

33.2.6.2 Ensure that the location and design of activities and developments that generate significant levels of traffic or increased demand for parking are accessible by other transport modes and do not result in:

- a significant increase in traffic that would be incompatible with the capacity of adjoining roads and their function in the road hierarchy, or would lead to unacceptable congestion; or
- an on-street parking demand that extends into Residential Areas and/or leads to unsatisfactory parking arrangements; or
- the creation of an unacceptable road safety risk.

Roading hierarchy

33.2.6.3 Support and maintain the defined road hierarchy as identified on District Planning Map 33

Pedestrian access and accessibility for people with restricted mobility

33.2.6.4 Maintain or enhance safe, convenient and easily legible pedestrian access to buildings.

33.2.6.5 Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility.

Servicing and site access

33.2.6.6 Require the provision of appropriate servicing and site access for activities in Business Areas.

METHODS

- Planning Maps
- Rules
- Master Plans, Structure Plans and Concept Plans
- Urban Development Strategy & Growth Spine concept (including Transport and Infrastructure Delivery Projects)
- National standard access design criteria including NZS 4121:2001 (or its successor)
- Operational activities (WCC Transport Strategy, Walking and Cycling Plans)
- WCC Centres Policy
- Annual Plan

- Long Term Council Community Plan
- Advocacy (Council Social Policy)
- National standard access design criteria including NZS 4121:2001 (or its successor)
- Other mechanisms (Regional Land Transport Strategy WCC Bylaws and Traffic Regulation Orders)

22.2 Background

As Wellington continues to grow, there is likely to be increasing pressure on the City to accommodate larger numbers of people travelling to and within the urban environment. This produces a complex pattern of journeys and places considerable pressure on the existing road and public transport infrastructure. The road hierarchy classifies roads according to their function and the various pressures such as traffic volume, peak flows and access. Most Business Areas are located on main arterial routes or principal streets, with many areas experiencing pressure in peak traffic times. The road hierarchy is a resource management tool to assist with the sustainable management of roading infrastructure.

Transport options are a key component in the Urban Development Strategy and maintaining the compact urban form of the City. Good access also helps make the City more legible and user-friendly and in this regard, developments providing integrated transport options including public transport and good pedestrian access will be encouraged. Residential activities in the Business 1 area will not be required to provide parking for residents in order that public transport options are promoted.

Council acknowledge that many business activities involve goods movement and need to be located near, or on major roading networks. Generally, large scale goods movement activities located on such networks do not create significant increases in traffic congestion. However some land uses, notably large scale retailing and larger employment activities, can place considerable pressure on the road network. Similarly a collection of co-located activities may have a cumulative effect on traffic generation and the road network causing considerable inconvenience to local residents and result in a loss of residential amenity and character. Large-scale businesses, large scale retailing, and leisure developments in Business Areas will be encouraged to take into account their proximity to regular and frequent public transport facilities and ensure that their impact on the road network and surrounding neighbourhoods is manageable. To assess this, Council will require a transportation impact assessment via the resource consent process for all new developments that exceed the car parking thresholds.

22.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 10: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p>This option is not recommended.</p>	<p>No on site parking required. Parking able to be established anywhere, although resource consent required for 120 or more car parks to assess safety and road impact issues.</p> <p>On site servicing required for all suburban centre zoned sites.</p>	<p>Low implementation costs due to low regulatory nature of the provisions.</p>	<p>Does not promote alternative transport modes and is therefore not in keeping with the Urban Development Strategy or the Regional Policy Statement.</p> <p>Does not provide the opportunity to assess impacts on the roading network arising from activities that generate high traffic flows.</p>
<p>Option 2 – provisions proposed in the draft plan change.</p> <ul style="list-style-type: none"> • <i>Activities with 70 or more car parks, or that occupy a building of 5000m² in area or more, will require a resource consent as a Restricted Discretionary Activity.</i> • <i>Maintain existing</i> 	<p>No on site parking required.</p> <p>Activities that occupy large buildings or that provide 70 or more carparks will be assessed for impact on the road network.</p> <p>Large scale retail activities and out of centre retail activities will be able to be assessed for their impact on the roading network and also for their ability to support alternative</p>	<p>The impacts that high traffic generating activities have on the roading network, which have gone unchecked in the past, will be better managed in support of maintaining the sustainability of the roading network.</p> <p>The need to provide parking for large scale and activities that generate high volumes of traffic will be managed.</p> <p>The Urban Development Strategy and Regional Policy Statement will be supported by the promotion of activities that are able to be serviced by alternative transport modes, including public transport. This will</p>	<p>The standards triggering the need for resource consent for carparking are relative arbitrary, may prove to be ineffective and unlikely to capture the adverse effects they are designed to manage.</p>

Table 10: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<p><i>parking layout and site access provisions.</i></p> <p>This option is not recommended.</p>	<p>transport modes, such as public transport.</p>	<p>assist in achieving a sustainable compact urban form.</p>	
<p>Option 3 – proposed new policies, rules and standards.</p> <ul style="list-style-type: none"> • <i>Activities with 70 or more car parks, or have unsatisfactory car parking provision will require a resource consent as a Restricted Discretionary Activity.</i> • <i>Improved access for pedestrians and those with mobility restrictions</i> • <i>Promotion of multiple modes of transport</i> • <i>Maintain existing parking layout and</i> 	<p>No on site parking required.</p> <p>Promotes transit orientated and pedestrian friendly developments.</p> <p>Provides key matters of assessment for activities and developments that generate high levels of vehicle movements or that provide high levels of on site parking.</p> <p>Large scale retail developments of 10,000m² in area or more will be assessed for their ability to support multiple access modes, pedestrian friendliness and reduce impacts on the roading network.</p>	<p>Is relatively light on regulation, thus is anticipated to be cost effective and efficient to implement.</p> <p>This approach promotes and supports transit orientated development (i.e. haulage and distribution firms) to locate in Business Areas, thus supports a sustainable compact urban form.</p> <p>Is in keeping with the provisions of the Urban Development Strategy and Urban Development Strategy, particularly the growth spine concept.</p> <p>The Urban Development Strategy and Proposed Regional Policy Statement will be supported by the promotion of activities that are able to be serviced by alternative transport modes, including public transport. This will assist in achieving a sustainable compact urban form.</p>	<p>This option may generate the need for more resource consents and therefore increase the costs of implementing the Plan.</p> <p>The promotion of transit orientated developments may not extend to creating them. This policy direction is not supported by requirements in rules and may therefore not generate the desired results (except for where master, concept or structure plans have been prepared).</p>

Table 10: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Access and Transport			
Option	Key Features	Advantages	Costs and Risks
<i>site access provisions.</i> This option is recommended.		The use of master, concept and structure plans will provide more certainty around achieving transit orientated and pedestrian friendly development.	

22.4 Background Documents

- WCC - Wellington – our sense of place: building a future on what we treasure (2004)
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Transport Strategy (2004) and Transport Strategy in the Urban Development Strategy (2006)
- Greater Wellington Regional Policy Statement
- The Australian and New Zealand Standard 2891.1 – 2004, Parking Facilities, Part 1: Off-Street Car Parking

23. Signs

33.2.7 To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.

23.1 Proposed Policies and Methods

33.2.7.1 Manage the design of signs (and their associated structures and affixtures) to enhance the quality of signage within Business Areas.

33.2.7.2 Manage the scale, intensity and placement of signs to:

- maintain and enhance the visual amenity of the host building or site, and
- be of a form and scale appropriate to viewer distance and viewing speed
- reduce visual clutter and viewer confusion
- ensure public safety.

33.2.7.3 Ensure signs in Business Areas do not adversely affect the architectural integrity of the building on which the sign is located.

33.2.7.4 Ensure that signs contribute positively to the visual amenity of the building neighbourhood and cityscape.

33.2.7.5 Ensure that signs in Business Areas do not adversely affect the amenities of nearby Residential Areas.

METHODS

- Rules
- Design Guides (Business Area Design Guide, Signs Design Guide)
- Other mechanisms (WCC Bylaws, Encroachment Licenses, Pavement Licences, Building Act, Advertising Standards Authority)

23.2 Background

Signs of all types are an anticipated and established part of Business environments in helping people understand what goods and services are on offer. However, the scale, number, illumination, motion and placement of signs are all matters that need to be managed to avoid or manage adverse effects on public safety, the appearance and amenity values of Business 1 Area in particular, and the character and appearance of buildings and Heritage Areas. It is acknowledged that generally Business Areas are able to absorb larger signs than say in Centres due to the differences in character and standards in amenity values.

The signage policies (and other provisions) have been specifically drafted to provide significant flexibility to respond to the varied nature of activities in Business Areas and their differing signage requirements and as a result do not limit the number of signs permitted on a site. However, in providing this flexibility, Council wishes to ensure that this flexibility is not abused. Council does not accept that making provision for multiple signs should be used as an argument to enable larger, more

intrusive signage. For this reason, the explanation of Policy 33.2.7.4 explicitly states that Council will not apply a permitted baseline assessment (i.e. a comparison of the proposed sign against a hypothetical signage scenario that complies with the signage standards outlined in the Plan).

This is particularly relevant when assessing third party (billboard) signage. Third party (billboard) signage is often larger and more visually dominant than signage associated with a specific activity. Third party signage was identified through Suburban Centre monitoring as generally being associated with a higher degree of adverse effects and in this regard the signage policies (and provisions) seek to manage these affects.

Ensuring signs maintain public safety is also important. Because of this, illuminated, animated and flashing signs are controlled to prevent conflict with traffic safety.

Through the Suburban Centres review it also became apparent that some of the existing signs provisions were subject to interpretational difficulties, making Plan implementation difficult and inefficient.

23.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 11: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p>This option is not recommended.</p>	<p>A broad range and size of signage is permitted, including several signs able to be erected on a single building façade.</p>	<p>Relatively low cost to implement as sign provisions are generous in proportion and number.</p>	<p>Signage is detracting from Business Areas and along major transport corridors to the City. It is not maintaining or enhancing the amenity values in Centres so these provisions are not achieving the purpose of the Act (particularly as regards to section 7).</p>
<p>Option 2 – new provisions proposed in the draft plan change.</p> <ul style="list-style-type: none"> clarified the intent of existing rules; in particular to locate signs on plain walls when attached to buildings, and to ensure signs do not project above the part of the building on which the sign is located. apply rules to control illuminated/animated signs that pose a potential 	<p>These provisions recognise a broader range of scenarios where signage is likely to have adverse effects, including signs erected on structures as well as buildings.</p> <p>Overall, the size and scale of permitted signs to be reduced.</p> <p>Introduction of a Signs Design Guide to assist in assessing signs that require a resource consent.</p> <p>The policy explanations offer assessment guidance</p>	<p>Signage will be better managed and therefore less likely to generate adverse effects on the appearance and amenity values of Centres, and the character and appearance of buildings and Heritage Areas.</p> <p>Clarification of existing rules will increase efficiency in implementing the Plan.</p> <p>Public safety will improve by controlling signs that can create traffic hazards.</p> <p>Rules around temporary signage will be relaxed, thus assisting temporary activities in establishing.</p>	<p>It is possible that the more restrictive provisions will give rise to additional resource consent applications, thus making the Plan more costly to implement.</p> <p>Third party signage would still be able to be erected as of right in Business Areas.</p> <p>Potential for multiple signs to be used as an argument to enable larger, more intrusive signage in a permitted baseline argument.</p>

Table 11: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<p>traffic safety hazard.</p> <ul style="list-style-type: none"> • Permit certain types of temporary signs. • Apply rules to signs located on any structure. <p>This option is not recommended.</p>	<p>for considering resource consent applications.</p>		
<p>Option 3 – proposed new policy provisions</p> <ul style="list-style-type: none"> • clarify the intent of existing rules; in particular to locate signs on plain walls when attached to buildings, and to ensure signs do not project above the part of the building on which the sign is located. • apply rules to control illuminated/animated signs that pose a potential traffic safety hazard. 	<p>These provisions recognise a broader range of scenarios where signage is likely to have adverse effects, including Heritage Areas, third party signs and signs erected on structures as well as buildings.</p> <p>Introduction of a Signs Design Guide to assist in assessing signs that require a resource consent.</p> <p>The policy explanations offer assessment guidance for considering resource consent applications.</p>	<p>Signage will be better managed and therefore less likely to generate adverse effects on the appearance and amenity values of Centres, and the character and appearance of buildings and Heritage Areas.</p> <p>Clarification of existing rules will increase efficiency in implementing the Plan.</p> <p>Public safety will improve by controlling signs that can create traffic hazards.</p> <p>Rules around temporary signage will be relaxed, thus assisting temporary activities in establishing.</p>	<p>It is possible that the more restrictive provisions will give rise to additional resource consent applications, thus making the Plan more costly to implement.</p>

Table 11: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – Signs			
Option	Key Features	Advantages	Costs and Risks
<ul style="list-style-type: none"> • Permit certain types of temporary signs. • Apply rules to signs located on any structure. • Restrict third party signage. <p>This option is recommended.</p>	<p>The potential permitted baseline argument for multiple signs to be used to enable larger, more intrusive signage is removed.</p>		

23.4 Background Documents

- District Plan Monitoring Programme – Effectiveness of the Plan Relating to Heritage
- Ministry for the Environment – New Zealand Urban Design Protocol (2005)
- Wellington City District Plan Monitoring Report, Wellington’s Suburban Centres 2007/2008

24. Subdivision

33.2.8 To ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated.

24.1 Proposed Policies and Methods

33.2.8.1 Ensure the sound design, development and appropriate servicing of all subdivisions.

METHODS

- Rules (Code of Practice for Land Development)
- Design Guides
- Other mechanisms (WCC Bylaws)
-

24.2 Background

Implementation and monitoring of the effectiveness and efficiency of the District Plan and other research has not indicated notable deficiencies in the way existing provisions achieve the above objective. Only minor changes are proposed to enhance the effectiveness of the provisions, and specifically to improve the workability of permitted subdivision rules.

The process of subdividing land and buildings sets out the structure for future development and the potential demand on public services and infrastructure. The layout of new subdivisions often remains a durable feature of the environment. This is particularly the case for the layout of roading networks and other infrastructure. Council's Code of Practice for Land Development guides subdivision design and provides a framework for considering subdivision proposals.

The one key area where change is to the permitted activity subdivision rule is the addition of a standard relating to the undergrounding of services where new roads are proposed. In addition, explanatory text under the policies has been amended to include reference to master, concept and structure plans where these have been prepared and are relevant for assessing subdivision activities.

Permitted Activity subdivisions are very rare as a result of the difficulties in passing all standards. These standards were reviewed and where changes could be made without increasing risk of adverse effects then these have been recommended. It is intended these minor changes will improve the workability of that permitted activity rule, resulting in its more frequent use and ultimately a more efficient Plan.

The existing provisions were examined at the time of being included in the 'first generation' District Plan, and with minor amendments to improve the workability of permitted rules, continue to remain relevant and appropriate.

24.3 Background Documents

- District Plan Change 45 – Urban Development Areas and Structure Plans
- District Plan Change 46 – Subdivision Design Guide

25. National Grid

33.2.9 Manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading and development of the electricity transmission network is not compromised.

25.1 Proposed Policies and Methods

33.2.9.1 Restrict the location of buildings and structures near high voltage transmission lines.

33.2.9.2 Discourage the establishment of vegetation near high voltage transmission lines, where the mature height of the vegetation would encroach into the growth limit zone for the line.

33.2.9.3 Reduce the potential risks associated with high voltage transmission lines by encouraging the location of these away from urban areas and by restricting the location of development near such lines.

METHODS

- Rules
- Advocacy

25.2 Background

The efficient transmission of electricity on the national grid plays a vital role in the well-being of New Zealand, its people and the environment. Transporting electricity efficiently over long distances requires support structures (towers or poles), conductors, wires and cables, and sub-stations and switching stations. The operation, maintenance and future development of the transmission network can be significantly constrained by the adverse environmental impact of third party activities and development near the national grid.

In Wellington, parts of the national grid pass over established Business Areas. In these areas Council will seek to ensure that any new buildings and structures located near a high voltage transmission line (measured from the centreline at ground level) do not compromise the ongoing operation, maintenance, upgrading and development of the National Grid.

High voltage transmission lines can also generate potential adverse effects for surrounding land uses. In addition to wind noise and corona discharge noise, high voltage transmission lines generate potentially hazardous electromagnetic fields. In accordance with Policy 9 of the National Policy Statement on Electricity Transmission 2008 (NPSET), these are controlled by reference to the International Commission on Non-ionising Radiation Protection (ICNIRP) Guidelines.

The policies acknowledge the benefits provided by the national grid and recognise the potential for land use development to compromise the ongoing operation, maintenance, upgrading and development of the transmission lines.

In Business Areas any new buildings and structures, (including additions but excluding structures less than 2 metres in height in order to provide for fences) must be located further than 32 metres from high voltage transmission lines as defined on the Planning Maps. This is in recognition that development in close proximity to lines may result in increased risk to public health and safety (e.g. risk of electrocution) and may restrict the ongoing operation and maintenance of lines.

25.3 Options

The table below considers the cost and benefits of principle options considered during the preparation of the Suburban Centres review.

Table 12: The Efficiency, Effectiveness and Appropriateness of the Proposed Plan Change – National Grid			
Option	Key Features	Advantages	Costs and Risks
<p>Option 1 – Do nothing, Status Quo</p> <p><i>Retain the current District Plan provisions in relation to development in close proximity to high voltage transmission lines.</i></p> <p>This option is not recommended.</p>	<p>New buildings (including additions) must be located further than 30 metres from high voltage transmission lines, to protect occupants from potential health hazards.</p>	<p>Existing provisions are known</p>	<p>Council’s consideration is limited to the potential health risk of occupants of the buildings in close proximity to the transmission lines. The current rules do not provide for consideration of new buildings on the operation of the national grid network.</p> <p>The current provisions are not consistent with the National Policy Statement on Electricity Transmission.</p>
<p>Option 2 – new provisions introducing policies and rules.</p> <p>This option is recommended.</p>	<p>New buildings (including additions) and structures must be located further than 32 metres from high voltage transmission lines, to ensure that land development does not compromise the transmission network and to protect occupants from potential health hazards.</p>	<p>The proposed provisions are consistent with the National Policy Statement on Electricity Transmission.</p> <p>Resource consents for new buildings and structures within close proximity to transmission lines will be able to consider the possible impact of the work on the national grid.</p>	<p>May limit the scope of additions able to be carried out as of right by landowners.</p> <p>May result in a slight increase in the number of proposals that trigger the need for resource consent, increasing costs for applicants.</p>

25.4 Background Documents

- National Policy Statement on Electricity Transmission 2008 (NPSET)
- International Commission on Non-ionising Radiation Protection (ICNIRP) Guidelines

26. Coastal Environment

33.2.10 To maintain and enhance the quality of the coastal environment within and adjoining Business Areas.

26.1 Proposed Policies and Methods

33.2.10.1 Maintain the public's ability to use and enjoy the coastal environment by requiring that, except in the Operational Port Areas, public access to and along the coastal marine area is maintained, and enhanced where appropriate and practicable.

33.2.10.2 Ensure that any developments near the coastal marine area are designed to maintain and enhance the character of the coastal environment and waterbodies.

33.2.10.3 To recognise the special relationship of the port to the coastal marine area through identification of the Operational Port Area.

METHODS

- Rules
- Design Guides, e.g. Shelly Bay
- Advocacy
- Other mechanisms (New Zealand Coastal Policy Statement, Regional Coastal Plan)
-

26.2 Background

Monitoring of the effectiveness and efficiency of the District Plan, and other research and consultation has not indicated the need to substantially change existing provisions at this time.

Shelly Bay and Greta Point are two Business Areas that abut the coastline. Additional provisions have been included to encourage opportunities for public access to the water's edge.

The provisions will help to ensure that new development maintains and enhances the character of the coastal environment.

27. Natural and Technological Hazards

33.2.11 To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.

27.1 Proposed Policies and Methods

33.2.11.1 Identify those hazards that pose a significant threat to Wellington, to ensure that areas of significant potential hazard are not occupied or developed for vulnerable uses or activities.

33.2.11.2 In relation to the Wellington fault, discourage the location of

new structures and buildings within the ‘fault rupture hazard area’.

33.2.11.3 Ensure that the adverse effects of hazards on critical facilities and lifelines are avoided, remedied or mitigated.

33.2.11.4 Ensure that the adverse effects on the natural environment arising from a hazard event are avoided, remedied or mitigated.

33.2.11.5 Ensure that buildings and structures do not exacerbate natural hazards, particularly flood events, or cause adverse impacts on natural coastal processes.

METHODS

- Rules
- Advocacy
- Operational mechanisms (WCC enforcement of the Building Act and as a Civic Defence authority)

27.2 Background

Implementation and monitoring of the effectiveness and efficiency of the District Plan and other research has not indicated any deficiencies in the way existing provisions achieve the above objective. The policies and methods are workable and only very minor wording changes have been made to enhance the effectiveness of provisions.

While most of the rules and other methods relating to natural and technological hazards in Business Areas have been retained, a new policy has been introduced to recognise the potential risk posed by fault line hazards. As part of the ongoing review of the District Plan, Proposed District Plan Change 1 considered the specific flood hazard found in the Tawa and Takapu Area. Proposed District Plan Change 22 considered the specific matter of identifying the Hazard (Fault Line) Area. District Plan Change 1 became operative in 2002 and District Plan Change 22 in 2004. Until such time as further monitoring or practice indicates these provisions are deficient, it is accepted on the basis of the recent review that the provisions are appropriate. Likewise, the appropriateness of the other provisions was considered at the time of being included in the ‘first generation’ District Plan, and these remain relevant and appropriate.

Through the consultation process of the Suburban Centres Review, the Regional Council identified a hazard issue with the Porirua Stream and requested that the yard setback be increased and clarified that it should apply to structures as well as buildings. The objective and policies are considered workable and only very minor wording changes have been requested to the explanations under Policy 6.2.8.5 to refer to structures as well as buildings, thus enhance the effectiveness of provisions.

27.3 Background Documents

District Plan Change 1 – Tawa and Takapu Flood Hazard Areas

District Plan Change 22 – Hazard (Faultline) Areas Realignment and Rules

28. Hazardous Substances

33.2.12 To prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal.

28.1 Proposed Policies and Methods

33.2.12.1 Ensure the environment is safeguarded by managing the storage, use, handling and disposal of hazardous substances.

33.2.12.2 Reduce the potential adverse effects of transporting hazardous substances.

33.2.12.3 Control the use of land for end point disposal of waste to ensure the environmentally safe disposal of solid and hazardous waste.

33.2.12.4 To require hazardous facilities to be located away from Hazard Areas.

33.2.12.5 In assessing an application for a resource consent relating to hazardous substances, the following matters will be considered:...

METHODS

- Rules (conditions on resource consents)
- Other mechanisms (Health Act, Hazardous Substances and New Organisms Act 1996 and its Transitional Provisions, Health and Safety in Employment Act, 1992)
- Other mechanisms (advocacy and bylaws) [and NZ land transport legislation (including Land Transport Act 1998, Land Transport Rule: Dangerous Goods 1999 and New Zealand Standard 5433:1999).]^{PC35}
- WasteTRACK database tracing system
- Other mechanisms (Regional Plans [and Hazardous Substances and New Organisms Act 1996].)

28.2 Background

Council is concerned that the community and environment should not be exposed to unnecessary risk from hazardous substances. The District Plan aims to control use of land in order to prevent or mitigate any potential adverse effects of hazardous substances by considering the appropriateness of the site location and other site requirements to minimise the risk of accidental release. Although these are only two facets of hazardous substances management, others are outside the scope of the District Plan.

The hazardous substance provisions of this Plan work in conjunction with the provisions for hazardous substances under the Hazardous Substance and New Organisms Act 1996. Controls imposed on hazardous substances under the Resource Management Act cannot be less stringent than those set under the Hazardous Substance and New Organisms Act 1996. This requirement is reflected in the rules for hazardous substances in this Plan.

District Plan Change 35 reviewed all hazards substances provisions throughout the Plan. That plan change sought to update the provisions in response to amendments to the HSNO Act and also to incorporate the updated Hazardous Facilities Screening Procedure.

Until such time as further monitoring or practice indicates these provisions are deficient, it is accepted that the provisions should be retained.

It is noted that the operative District Plan policies relating to contaminated land have been deleted from the review. These policies have been incorporated into a separate chapter as a result of proposed District Plan Change 69.

28.3 Existing provisions proposed to be retained

Most of the provisions are being retained in their current form. The effectiveness and efficiency of these provisions was considered as part of the ongoing review of the District Plan that resulted in the update of these provisions as part of District Plan Change 35. The appropriateness of existing provisions was examined as part of the section 32 analysis of District Plan Change 35 that became operative in 2005.

28.4 Proposed changes to achieve the above objective

Two main changes are proposed to the provisions. One policy has been reworded for the sake of clarity but with no change to the policy's intent. The second change is a new policy relating to the assessment of applications for resource consent relating to hazardous substances.

28.5 Background Documents

- District Plan Change 35 – Hazardous Substances
- District Plan Change 69 – Contaminated Land

29. *Tangata Whenua*

33.2.13 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.

29.1 Proposed Policies and Methods

33.2.10.4 Identify, define and protect sites and precincts of significance to tangata whenua and other Maori using methods acceptable to tangata whenua and other Maori.

32.2.13.1 Enable a wide range of activities that fulfil the needs and wishes of tangata whenua and other Maori, provided that the physical and environmental conditions specified in the Plan are met.

32.2.13.2 In considering resource consents, Council will take into account the principles of Te Tiriti o Waitangi/the Treaty of Waitangi.

METHODS

- Rules (condition on resource consent, consultation) Information

29.2 Background

Maori concepts present a different view for the management of the City's natural and physical resources. In particular, kaitiakitanga is a specific concept of resource management. By acknowledging ancestral relationships with the land and natural world, a basis can be constructed for addressing modern forms of cultural activities.

Particular features of the natural and cultural landscape hold significance to tangata whenua and other Maori. The identification of specific sites (such as waahi tapu/sacred sites and waahi tupuna/ancestral sites) and precincts will ensure that this significance is respected. For this reason, sites of significance and precincts are listed and mapped within the Plan.

Monitoring of the effectiveness and efficiency of the District Plan, and other research and consultation has generally not indicated the need to change existing provisions at this time. Council will continue to work with local iwi to identify sites and precincts of interest to tangata whenua, which may result in further plan changes in the future. The Plan may also need to be updated to recognise any future Iwi Management Plans.

Chapter 2 of the District Plan which deals with Issues for Tangata Whenua will be reviewed as part of the Council's ten yearly review of the plan.

30. Definitions

The Suburban Centre Review also proposes a variety of new definitions and amendments to existing definitions that will aid the implementation of the plan. These include:

- A new definition for **ancillary retail** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **automotive and marine supplier** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **building supplier** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **farming and agricultural supplier** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **garden and landscaping supplies** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **gross floor area (for the purpose of any retail activity)** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **hire services** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **integrated retail developments** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **large format retail** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **mural** to aid in the interpretation of the signage provisions. This will exclude murals and other public art from the sign definition.
- A new definition for **noise emission level** to aid in the implementation of the policies and rules relating to noise and amenity.
- A new definition for **office furniture, equipment and systems supplies** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **official sign** to aid in the interpretation of the signage provisions. This will exclude official signs such as traffic directional signs from the sign definition.

- A new definition for **places of assembly** to aid in the implementation of the policies and rules relating to access and transport.
- A new definition for **regionally significant centre** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **retail activity** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **sculpture** to aid in the interpretation of the signage provisions. This will exclude sculptures designed for public interest from the sign definition.
- Amend the definition of **sign** by adding the words ‘writing, engraving, carving, logo, notice, placard, hording, billboard, aerial display, banner’. Amend the definition to include the sentence ‘of the public and has implied or actual commercial advertising content’. Remove the words ‘this excludes signs within buildings and for the management of the legal road’. Add the words ‘this definition includes:’ with the following bullet points:
 - Signs within buildings
 - Signs for the management of the legal road including official signs
 - Advertising on vehicles, including trailers, except where the vehicle or trailer acts as a stationary support structure for commercial advertising
 - Murals
 - Sculptures

This will remove the element of confusion on what constitutes the definition of a sign
- A new definition for **supermarket** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **the golden mile** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **third party advertising** to aid in the interpretation of the signage provisions.
- A new definition for **trade supply retail** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **vehicle orientated uses** to aid in the implementation of the policies and rules relating to access and transport.
- A new definition for **wholesaler** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.
- A new definition for **yard based retailing** to aid in the implementation of the policies and rules relating to the role and function of Centres and Business Areas as well as the type of activities that locate within these areas.

The revised definitions will provide for simpler, more effective implementation of the Centres and Business Area provisions. In this regard they are necessary to enable Council to deliver on the objectives for these areas.