



Summary of Submissions
Proposed District
Plan Change 48
Central Area Review

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
90	Waterfront Watch C/-Iona Pannett PO Box 19045 Wellington	The submission includes a comprehensive list of all objectives, policies and rules, annotated to indicate whether they are supported or opposed by the submitter.	<ul style="list-style-type: none"> • That objective 12.2.10 is adopted. • That policy 12.2.10.1 is adopted. • That policy 12.2.10.2 is adopted. • That policy 12.2.10.3 is adopted. • That policy 12.2.10.4 is adopted. • That policy 12.2.10.6 is adopted. • That objective 12.2.12 is adopted. • That objective 12.2.15 is adopted. • That policy 12.2.15.1 is adopted. • That policy 12.2.15.14 is adopted. • That objective 12.2.2 is adopted. • That policy 12.2.2.1 is adopted. • That policy 12.2.2.2 is adopted. • That policy 12.2.2.3 is adopted. • That policy 12.2.2.4 is adopted. • That objective 12.2.3 is adopted. • That policy 12.2.3.1 is adopted. • That policy 12.2.3.2 is adopted. • That objective 12.2.5 is adopted. • That policy 12.2.5.1 is adopted. • That policy 12.2.5.10 is adopted. • That policy 12.2.5.2 is adopted. • That policy 12.2.5.3 is adopted. • That policy 12.2.5.4 is amended to reflect concern: We are opposed to building breaching height limits set by the Plan even where the bulk of a building has been reduced. We believe these limits to be generally reasonable (except in a few cases) so believe there is no need for them to be breached in the first place. • That the policy 12.2.5.5 is amended to reflect concern: Given we are opposed to buildings breaching height limits; we do not see any need for this provision. We request that it be removed. • That policy 12.2.5.6 is adopted. • That policy 12.2.5.7 is adopted. 	Y

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			<ul style="list-style-type: none"> • That policy 12.2.5.8 is adopted. • That policy 12.2.5.9 is adopted. • That objective 12.2.6 is adopted. • That policy 12.2.6.1 is adopted. • That policy 12.2.6.10 is adopted. • That policy 12.2.6.11 is adopted. • That policy 12.2.6.12 is adopted. • That policy 12.2.6.14 is adopted. • That policy 12.2.6.15 is adopted. • That policy 12.2.6.16 is adopted. • That policy 12.2.6.18 is adopted. • That policy 12.2.6.2 is adopted. • That policy 12.2.6.3 is adopted. • That policy 12.2.6.4 is adopted. • That policy 12.2.6.5 is adopted. • That policy 12.2.6.7 and standard 13.6.3.3 be amended to reflect concerns: We support this provision, but would like the intrusion of viewshafts become a Discretionary Activity (Unrestricted) given the importance of protecting these views. • That policy 12.2.6.9 is adopted. • That policy 12.2.7.2 is adopted. • That policy 12.2.7.3 is adopted. • That objective 12.2.8 is adopted. • That policy 12.2.8.1 is adopted. • That policy 12.2.8.2 is adopted. • That policy 12.2.8.3 is adopted. • That policy 12.2.8.4 is adopted. • That policy 12.2.8.5 is adopted. • That policy 12.2.8.6 is amended to reflect concerns: We are very concerned about the inclusion of this provision. We believe that strict limits should be put on any new buildings for now and the future. • That policy 12.2.8.7 is adopted. 	

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			<ul style="list-style-type: none"> • That policy 12.2.8.8 is adopted. • That policy 12.2.8.9 is adopted. • That rule 13.1.3 is adopted. • That rule 13.2.2 is adopted. • That rule 13.2.2.1 is adopted. • That rule 13.3.5 is amended to reflect concerns: That minor additions and alterations to existing buildings in the Lambton Harbour area become a Discretionary Activity (Unrestricted). Given the sensitive nature of this area, even minor additions (such as adding to a building's height by 10%) can be quite significant. • That rule 13.3.8.18 is amended to reflect concerns: Given the importance of preserving the integrity of the viewshafts, the percentage of intrusion should be set at 0%. • That rule 13.3.9 is adopted. • That rule 13.4.5 is adopted. • That rule 13.4.6 is adopted. • That standard 13.6.3.1.3 is adopted. • That standard 13.6.3.1.4 is adopted. • That standard 13.6.3.2 (Building Mass) is adopted. • That standard 13.6.3.4 (Sunlight Protection) is adopted. • That standard 13.6.3.7 (Ground Floor Frontages and Display Windows) is adopted. • That standard 13.6.3.8 (Site Coverage) is adopted. • That standard 13.6.3.8.1) Site Coverage in the Lambton Harbour Area) is adopted. • That standard 13.6.4 (Sign Standards) is adopted. 	
89	Bellingham Estate C/- Connell Wagner Ltd 102 Customhouse Quay PO Box 1591 Wellington		Amend DP Map 18 as follows, to correct an apparent zone anomaly: a) Display subdivided Lots 1-4 DP 348486 on DP Map 18. b) Change land use zone of Lot 4 DP 348486 from Residential (Inner) to Central Area.	Y
88	Wesley Wellington Parish	Wellington Wesley Parish objects to the listing of the	The Wellington Wesley Parish rejects the introduction of the Wesley	Y

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	C/- Spencer Holmes Ltd Level 6, 8 Willis Street PO Box 588 Wellington Attn: Ian Leary	Wesley Church as a heritage area. The Parish may in the future, consider undertaking alterations to the old hall, as well as building on vacant land within the site and as a result does not support the need for a wider heritage area on the site.	Church Heritage Area under DPC 48 and submit that 75 Taranaki Street be removed from the list of identified heritage areas along with any other consequential amendments.	
87	Monopoly Holdings Ltd 8 Courtenay Place Wellington	The submitter generally supports the creation of the Courtenay Place Heritage Area and the reduction in buildings heights to 18 metres, provided there is some discretion to consider well designed, taller buildings.	Approve the 18m maximum height in the Courtenay Place Heritage Area with some design discretion for good design. Greater care needs to be taken with additions to heritage buildings (the submitter cites the proposed Palliser development at 8 Cambridge Tce as a poor example of a heritage addition).	Y
86	Victoria University PO Box 600 Wellington Attn: Jenny Bentley	Victoria University generally supports the plan change but seeks clarification and commitment from Council regarding the consistency and timeliness of resource consent assessments, particularly in relation to urban design and heritage. The university also considers that environmentally sustainable design (ESD) principles should be given greater weighting in the proposed rules.	<ul style="list-style-type: none"> The reinstatement of assessment criteria for all discretionary activity (restricted) rules. 	Y
			<ul style="list-style-type: none"> The inclusion of assessment criteria relating to the incorporation of environmental sustainable design (ESD) principles in the construction or alteration of and addition to Central Area buildings. An explicit recognition by Council (by way of recorded comment in the decision report on Plan Change 48) of the need to provide funding through the Annual Plan process to support the employment of an adequate number of qualified 'in house urban design and heritage advisors. 	

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85	Golden Bay Cement & Firth Industries C/- Hill Young Cooper Ltd 3/187 Featherston Street PO Box 8092 Wellington	The submitter's concerns are generally limited to the noise provisions in the District Plan relating to fixed plant and noise generated within the Operational Port Area.	<ul style="list-style-type: none"> That the section of Appendix 1 of the operative Central Area rules entitled 'Areas affected by Noise from the Operational Port Area' be included in the proposed plan change. 	Y
			<ul style="list-style-type: none"> That rule 13.6.1.1 (fixed plant) is amended so it does not apply to industrial activities located within the Operational Port Area. 	
84	Iain Colligan 7b, 192-194 Willis Street Wellington	The submitter opposes the proposed changes that the "Tunnel entrance and Ghuznee Street intersection be rezoned from Inner Residential to Central Area and Open Space A. The submitter opposes the proposal to apply a building height standard of 27 metres (above ground level) over the land rezoned as Central Area".	That the area around the "motorway tunnel entrance and Ghuznee Street intersection be developed as a park space".	N
83	Dr Paul Hendy Mrs Raewyn Hendy 2E St. Peters Apartments Wellington	The submitter opposes the proposed rezoning of land at the Ghuznee Street exit from the motorway tunnel.	That the WCC reconsider its position on the proposal to rezone land near St Peter's and the Ghuznee Street tunnel entrance as Central Area.	Not Specified
82	Truebridge Callender Beach Ltd C/-Barry Sayer PO Box 13 142 Wellington	Truebridge Callender Beach (TCB) opposes some aspects of and proposes some changes to the proposed Central Area Review (CAR).	<ul style="list-style-type: none"> That rules 13.1.1 and 13.4.2 be amended so that only, the creation of vacant land, open land or parking areas at ground level, which are visible from a public space are Discretionary Activities (Unrestricted). 	Y
			<ul style="list-style-type: none"> Amend Rule 13.2.3.9 to be less confusing. Revise as drafted below: for any additional storeys above ground floor level, no more than 20 percent of the width of a frontage facing a road, boardwalk, park square or land ... shall be blank space". That the last paragraph of rule 13.2.4. (subdivision) be amended as follows: "The requirement to meet these standards [will] be waived if resource consent has been sought and granted for those aspects that do not comply [or the building has existing use rights under section 10 of the RMA]". 	

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			<ul style="list-style-type: none"> • That the first reference to Discretionary Activity (Restricted) in rule 13.3.3 be removed. • Conditions 13.3.8.14 and 13.3.8.15 do not provide for a building which is slightly over the permitted height limits and also slightly over the permitted mass limits. Provision should be made for buildings which are slightly over both of these limits to be a discretionary activity. We suggest the following: - maximum building height must not be exceeded by more than 15 percent, and the building mass standard must not be exceeded by more than 15 percent. • TCB considers that requirement 13.6.1.3.14 (vehicle access) should be deleted as it will be impossible to achieve on many central Wellington sites. • Amend standard 13.6.3.1.1 to provide for additions to existing buildings, or for buildings which are already over the specified height limits (wording supplied). • Amend a typographical error in standard 13.6.3.10 (wording supplied). • Amend standard 13.6.3.9 to ensure it refers to buildings rather than activities (wording supplied). • That provision be made for existing use rights in standards 13.6.5.1.2 and 13.6.5.1.3 (being subdivisions around existing buildings). • That provision be made for existing use rights in standard 13.6.5.1.5 regarding existing on-site servicing arrangements. • That accurate plans at a measurable scale are provided rather than a particular paper size (A4) and scale 1:500, under rule 13.1.4. • That the requirement for a certificate (regarding land not being subject to material damage etc) should be restricted to new buildings under rule 13.1.4. A certificate regarding the foundation design and ground conditions can then be provided by the developers structural and/or geotechnical engineers. 	

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81	Stephen John Pattinson 27 Elmslie Road Upper Hutt Wellington	The submitter is very concerned that PC 48 (regarded as a 'full review') omits significant issues, including: - traffic and its effect on the quality of the urban environment; - the (lack of) connections between the city and the waterfront; - energy efficiency and conservation; - the sustainability of Wellington Central's urban form. The above issues are fundamentally inter-related and are all critical to the physical, social and economic welfare of Wellington City.	That Plan Change 48 be seriously revised to address concerns, relating to long term traffic needs, lack of connections to the waterfront, greater recognition of energy efficiency and conservation, and the sustainability of Wellington's urban form.	Y
80	Roland Sapsford PO Box 11-708 Manners Street Wellington	The submitter raises a number of issues, but has a specific focus on heritage issues and the land in the south-western corner of Te Aro adjoining the Inner City Bypass	<ul style="list-style-type: none"> <li data-bbox="1205 523 1883 608">• That the plan needs to take a much more comprehensive and detailed approach to achieving high quality development based on a New Urbanist Charter. <li data-bbox="1205 651 1883 799">• That the Central Area include a provision that demolition of any building more than 60 years in age is a non-complying activity and any application for a consent to demolish requires a heritage and urban design assessment. Blanket protection is the most efficient means to encourage responsible development. <li data-bbox="1205 810 1883 959">• I strongly support the concept of a Cuba St heritage area. The boundary on Webb St needs to be extended Westwards to meet the synagogue. The boundary on Abel Smith St needs to extend Westwards to take in heritage buildings between Abel Smith and Kensington Sts. <li data-bbox="1205 970 1883 1054">• That the distinction between heritage and character be expunged from the plan and any character assessments must include a heritage assessment. <li data-bbox="1205 1066 1883 1214">• That land adjacent to the bypass be zoned to encourage low-scale development in keeping with the heritage character of the area, especially West of Tory St. Isolated pockets of pre-1930s buildings need to be protected - especially in the area of Victoria, Webb, Willis, Abel smith Streets and Kensington St. <li data-bbox="1205 1225 1883 1278">• Rezone buildings and land on Willis St south of Abel Smith St to more accurately reflect their role, use and location. 	Y

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			<ul style="list-style-type: none"> That the Ghuznee St off-ramp be rezoned as Open Space A rather than Central Area, or failing this, as a special development site for eco-housing. 	
79	Steve Dunn 1 Nikau Street Newtown Wellington	The submitter does not support the proposed zoning along the edge of the bypass because they consider there is an opportunity to provide more generous open space areas that can improve biodiversity and amenity values.	I request that the zoning for Open Space along the Inner City Bypass be extended to include all edges of the bypass from Arthur Street to the tunnel that are not currently built on (as per the supplied diagram).	Y
78	Con Anastasiou Level 11 89 The Terrace PO Box 10779 Wellington	The submitter has commented on issues of building mass, building height, wind, and the proposed Central Area Urban Design Guide.	<ul style="list-style-type: none"> Deletion of Policy 12.2.5.2 (building mass) or substantial amendment of the same to remove its incompatibility with section 5 of the Resource Management Act 1991. 	Y
			<ul style="list-style-type: none"> Deletion of Policy 12.2.5.5 (design excellence for over height building). Deletion of Policies 12.2.5.6 to 12.2.5.9 (inclusive) (wind) and the italicised text that follows. The relocation of the provisions of Rule 13.3.4 "BUILDINGS AND STRUCTURES" into rule 13.2 so that the activities stipulated in rule 13.3.4 become Controlled Activities as they essentially are under the Operative District Plan and the deletion of references to building mass from those provisions. The relocation of the rule 13.4.9 into rule 13.3 so that these activities become Discretionary Activities (restricted) as they largely are now under the Operative District Plan. Deletion of Rule 13.6.3.2 - Building Mass. Amendment of Rule 13.6.3.5 (wind) as follows: increase of the 3.5 m/s parameter in the table in rule 13.6.3.5.2(b) to 8m/s and increase of the 2.5m/s parameter in the table in rule 13.6.3.5.2(b) to 5.5 m/s. Increase of the 170 hour per year parameter in the table in rule 13.6.3.5.2(b) to 350 hours per year. Amendment of the requirement on the developer to reduce the change in hours to a maximum of 170 hours to a maximum of 350. Increase in the comfort wind strength in rule 	

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			<p>13.6.3.5.2(d) to 5.5m/s. Deletion of the italicised words at the end of rule 13.6.3.5.3.</p> <ul style="list-style-type: none"> All such consequential amendments to the Proposed Plan Change as are necessitated by the foregoing decisions sought. Deletion of the paragraph headed "Bulk" in Section 3 of the Proposed Design Guide and deletion of paragraph G3.8 under the heading "Building Bulk". 	
77	Transit New Zealand PO Box 27477 Wellington Attn: Mike Weir	As manager of the state highway network, Transit has an interest in a number of provisions in PC48.	That the Council adopt the proposals (specifically objective 12.2.4 and associated policies, 12.2.9 and associated policies, 12.2.15 and associated policies, 12.2.10 and associated policies and Planning Map 33). The District Plan should recognise Transit New Zealand as an affected party to be consulted in relation to the masterplan for the Pipitea Precinct and resource consent applications that affect the inner city bypass.	Y
76	Rosbeer Singh Gill B85, 10 Ebor Street Wellington	The submitter raises concerns about the potential impact of the Port Redevelopment Precinct and Pipitea Precinct on the vibrancy of the existing CBD. The submitter also comments on the proposed building height and building mass rules.	<ul style="list-style-type: none"> That the Council play a very strong role in restricting the amount of office space available on Harbour Quays and make it a mixed use development instead, which would bring a certain amount of life back to this part of town and compliment the city. The Council needs to play a very strong role in ensuring the planning requirements for the Pipitea Precinct consider all the economic effects on the city and appropriate height restrictions be applied to this location. I agree in principal with the proposals for height and mass, but would like some consideration to be given to developments that take place first that have to comply with the mass height ruling and not give unfair advantage to future developments. 	Y
75	The Warehouse Ltd C/- Planning Network Services Ltd 953 New North Road PO Box 77-037 Mt Albert Auckland	While the submitter generally supports PC48, it has some reservations about the potential for the rules and design guidelines to be administered in an inflexible manner.	<ul style="list-style-type: none"> Amend Policy 12.2.10.2 with respect to the management of the scale, intensity and placement of signs by deleting the words "and enhance" from the first bullet-point of the policy. 	Y

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			<ul style="list-style-type: none"> Amend Objective 12.2.2 by deleting the word "allowing" and substituting the word "enabling". Amend Rule 13.6.1.3 with respect to vehicle parking so that the standard reads: "1 space per 50m2 gross floor area". 	
74	Carl John Hawke 1E 192 Willis Street Wellington	I strongly oppose the proposed changes to the zoning of the land around the Ghuznee Street motorway off-ramp. The possible construction of new buildings in such a close proximity of the existing residential and office structures will block all natural light into these buildings.	The submitter suggests that the current zoning for the Ghuznee St/Tunnel Entrance are kept as they are. Another possible option could be to turn the old off ramp area into a public park or reserve.	N
73	Gazebo Holdings Ltd PO Box 9639 Wellington	The submitter is concerned that the sunlight protection provision applying to Clock Park will limit the potential building height of their property.	The submitter requests that Clock Park be removed from the list of public spaces in rule 13.6.3.4 as it will materially limit development potential for our property at 134 Courtenay Place.	N
72	New Zealand Historic Places Trust PO Box 19173 Wellington	The NZHPT is pleased that historic heritage has been given proper regard in preparation of this plan change, and many of the proposed provisions are expected to protect historic heritage from inappropriate development; the NZHPT strongly supports these aspects of the plan change. There are however some areas where amendments are needed. The NZHPT supports the proposed Central Area Urban Design Guide. Additionally, NZHPT supports the objectives and guidelines for the National War Memorial Area.	<ul style="list-style-type: none"> The NZHPT supports the following proposed objective and policy: Objective 12.2.3 and associated Policy 12.2.3.4 as well as the proposed method of identifying heritage areas. The NZHPT supports the following proposed objectives and policies: Objective 12.2.5 and Policy 12.2.5.1, 12.2.5.2, 12.2.5.3 and 12.2.5.4. The NZHPT supports the following proposed objectives and policies: Objective 12.2.6 and Policies 12.2.6.2 and 12.2.6.3. The NZHPT supports Policy 12.2.6.5, but would like to see the grounds at Old St Paul's included in the public areas to be protected from sunlight encroachment. The NZHPT supports Policy 12.2.6.9; however, we recommend that "and historic heritage" be inserted after "architectural integrity". That Policy 12.2.6.7 (viewshafts) be amended to include "significant landmark heritage items". There are other landmark heritage items that should also have their viewshafts protected (in addition to St Gerard's Monastery). The following objectives and policies are supported (12.2.8, 12.2.8.4, 12.2.8.5, 12.2.10, 12.2.10.3, 12.2.10.5, 12.2.16, 12.2.16.1, and 12.2.16.3). The NZHPT supports the retention and use of Shed 35 and 	Y

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			<p>Maritime House, as well as the requirement for adjacent new buildings to be sympathetic.</p> <ul style="list-style-type: none"> • The map in Appendix 01 is confusing as it is entitled "Courtenay Place Area" but the key notes "Courtney character". The submitter seeks that an explanatory note replace the existing key to describe that the map applies to rule 13.4.3. • The NZHPT supports restricting discretion to heritage among other matters in Rule 13.3.5, though perhaps the term 'historic heritage' would be clearer. • The NZHPT supports rule 13.4.8 • Rule 13.6.3.1.7 (Old St Paul's) needs to be revised to be less wordy or complicated and so that the height restrictions extend from all boundaries of Old St Paul's. • The NZHPT strongly supports the proposed height control standards in 13.6.3.1.5. • The NZHPT supports the exception of heritage buildings from the verandah requirement in Rule 13.6.3.6.2. • The NZHPT very strongly supports the heritage areas proposed to be added to Chapter 21, but notes that the proposed Appendix 7 (Stout Street Precinct Heritage Area) may have an error in Table 1. The façade of the Courts Building (number 3) is identified as a non-heritage building. Perhaps it is all of the building <i>except</i> the facade that is the non-heritage building. • The NZHPT considers confusion exists between the proposed Pipitea Precinct and the existing Maori Precinct in the Pipitea Area. It recommends another name be used for the new proposed precinct, or some other alternative. • The NZHPT supports Appendix 3 in its entirety with one minor exception, that the guideline regarding uncovering of archaeological remains during construction be added to ALL 	

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			<p>heritage areas (i.e. BNZ, Civic Centre and St Johns Church).</p> <ul style="list-style-type: none"> The NZHPT would appreciate it if the Council would alert users to the requirements pertaining to archaeological sites under the Historic Places Act (wording supplied). The NZHPT supports the objectives and guidelines for the National War Memorial Area. That the fifth bullet point of the guidelines be amended to read as follows: attached to the building with minimal intrusion into the building fabric, and in such a way as to be easily removable in the future without damaging the building. 	
71	Crail Bay Aquaculture Ltd Flat 9D St. Peters Apartments 192 Willis Street Wellington	The submitter is concerned about the proposed rezoning of land and heights of buildings allowed by central zoning near the Ghuznee St tunnel entrance. The proposed heights will affect view and light to the blocks of apartments adjacent to it.	The submitters request that the zoning be changed to either open space or green space, at the tunnel entrance Ghuznee Street intersection.	Y
70	David Greville Kember 31 Shannon Street Mt Victoria Wellington	The submitter considers the proposed activity standard in Rule 13.6.2.1.3 (regarding noise in public spaces) is far too generous.	<ul style="list-style-type: none"> That proposed rule 13.6.2.1.3 be deleted, alongside a prohibition of such noise activities in the city bylaws. Alternatively, if the suggested solution is too extreme, then reduce the activity standard level to 10 dBA L10. The submitter seeks additional explanatory text in policy 12.2.2.4 (3rd para) (wording supplied). 	Y
69	Christine Greenwood 9 Taipakupaku Road Karaka Bay Heights Wellington	I do not support tradeoffs that result in increased bulk but reduced height. I am opposed to use of 'discretion' to increase height of up to 35% across the 'low city' parts of the central area.	<ul style="list-style-type: none"> The submitter supported the following provisions: heritage areas, height control in heritage areas, 75% building mass and the noise, wind, sunlight and active ground floor provisions. 	N

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		<p>The submitter commended the changes which have been proposed which focus on a more rigours consent process, but did note some opposition or changes desired to the proposed rules.</p> <p>I do not support provision for new developments on the Lambton Harbour Area because the area between the sea and the quays is too narrow for large, bulky buildings which are aesthetically unappealing in this part of the city.</p>	<ul style="list-style-type: none"> That the new viewshafts be amended so that the views are wider than currently. The submitter did not support trade-offs that resulted in increased bulk, but reduced height; and opposed the proposal to increase height by up to 35% as a discretionary activity in the 'low city' or the provisions for new developments in the Lambton Harbour Area. 	
68	<p>Greater Wellington Regional Council PO Box 11-646 Wellington Attn: Ling Phang</p>	<p>The submission focussed on areas of direct interest to the submitter, being transport, hazardous substances and contaminated site, and the coastal environment.</p>	<ul style="list-style-type: none"> That the proposed objective and policy 12.2.12.1 be amended to better reflect the policy direction given by the NZ Coastal Policy Statement (NZCPS) in particular policies 3.5.1, 3.5.2 and 3.5.3. 	Y
		<p>The submitter also supports the policies and rules for the Port Redevelopment Precinct (12.2.4.1), Pipitea Precinct (12.2.4.2-12.2.4.4), the Te Aro Corridor (12.2.4.5) and the Wellington Regional Stadium (12.2.9.2 and 12.2.9.3) in relation to the key transportation links desired between these areas and the central city.</p>	<ul style="list-style-type: none"> Policies 12.2.12.2 and 12.2.12.3 should be made clear to ensure that these policies give effect to NZCPS policies 1.1.1 through to 1.1.5 (protection of natural character), policy 2.1.3 (the contribution that open space makes to coastal amenity values) and policy 3.2.4 (cumulative effects of activities are not adverse). GWRC recommends that the use of the Wastetrack system for the disposal of both waste liquid and solid hazardous substances be included as one of the methods to achieve policy 12.2.14.2. The site management plan does not appear to address any off site disposal options and that tracking of waste disposed off site (policy 12.2.14.5). These should be included as one of the key matters to be considered in assessing an application for a resource consent application. Provide a more explicit reference to the MFE Contaminated Land Management Guidelines 1-5 in policy explanation 12.2.14.7. 	

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			<ul style="list-style-type: none"> Clarify how the proposed new Port Redevelopment Precinct would provide for public access to the coastal marine area, in particular the area of coast between the Inter Island Wharf, Glasgow Wharf and Kings Wharf or not as the case may be. The submitter also supports the policies and rules for the Port Redevelopment Precinct (12.2.4.1), Pipitea Precinct (12.2.4.2-12.2.4.4), the Te Aro Corridor (12.2.4.5) and the Wellington Regional Stadium (12.2.9.2-12.2.9.3) in relation to the key transportation links desired between these areas and the central city. That the inclusion of site history information detailing all activities that have previously been carried out on a site be included in every consent application in section 3.2.2.6 and 3.2.3.5 of the plan (draft wording supplied). GWRC supports a number of transportation principles identified in the plan change and supported by its objectives, policies, methods and design guides (including 12.2.1, 12.2.15, 12.2.15.3, 12.2.15.1, 13.3.1), and seeks that the general provision for cyclists be stronger and more explicit in some of the precinct design guides and provisions. 	
67	Progressive Enterprises Ltd C'- Russell McVeagh Level 30 48 Shortland Street PO Box 8/DX CX10085 Auckland Attn: James Gardner Hopkins	The submitter is generally supportive, but seeks amendments to policies that do not adequately recognise the needs of large format retail.	<ul style="list-style-type: none"> That the Objectives and Policies be amended to better accommodate and recognise the appropriate provision of large format retail within the Central Area and the relevant operational and other characteristics of large format retail. 	Y
			<ul style="list-style-type: none"> That Rule 13.3.3 and Rule 13.3.8 be amended to clarify what activities are Discretionary (Restricted) Activities. 	

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			<ul style="list-style-type: none"> • That the activity status of the creation of carparking under Rule 13.4.2 be amended from a Discretionary Activity to a Restricted Discretionary with discretion limited to the same factors as for Rule 13.3.1. • Amend 13.6.3.2 Building Mass standard to recognise the operational characteristics of large format retail, being that most large format retail stores rely on floor space, rather than total building size. • That Rule 13.6.3.6 (verandah requirement) be amended to incorporate a dispensation clause to recognise the requirements of different types of retail development. • That Rule 13.6.3.7 (display windows) be amended to incorporate a dispensation clause to recognise the requirements of different types of retail development, especially large format retail where natural light can adversely affect quality of products e.g. supermarkets. • That the Plan Change be adopted insofar as it is consistent with the principles of the RMA and subject to the specific amendments sought in the remainder of the submission. • That the provisions of the new Urban Design Guide be amended to give effect to Progressive's concerns regarding the operational characteristics of large format retail. 	
66	New Zealand Institute of Surveyors Inc. C/- David Gibson 101 Yule Street Lyllall Bay Wellington	The Wellington Branch of the NZ Institute of Surveyors generally supports the proposed changes subject to a number of amendments contained in the submission.	<ul style="list-style-type: none"> • That the reference in the 2nd paragraph of 13.3 to 13.61 be rewritten to be 13.6.1. • That the last paragraph of rule 13.2.4 (subdivision compliance standards) should be rewritten to operate more effectively (draft wording supplied). 	Y

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			<ul style="list-style-type: none"> • That rule 13.4.9 be rewritten and corrected to reflect council's intentions. • That site access std (13.6.1.3.14) be deleted or amended so as to not apply to loading areas. • Height Control standards (13.6.3.1.1, 13.6.3.1.2 and 13.6.3.1.3) refer to the building height limits on map 32, but should also refer to the additional proposed map 32A. • The submitter notes that a number of the Subdivision standards (13.6.5.1) need to be rewritten to operative effectively. Some standards can be removed as they are applied twice or are not really a standard (i.e. 13.6.5.1.5 and 13.6.5.1.8). • That the reference to Registered Surveyor should now be replaced with the term "Licensed Cadastral Surveyor". • That the specified sheet size and scale for survey plan is unnecessary and should simply refer to being at a recognised scale. 	
65	Property Council of New Zealand C/- Beca Carter Hollings & Ferner Ltd PO Box 3942 Wellington 6140 Attn: Phillip Percy	The Property Council commends the Council on the general approach taken, but submits that council officers need more tools to work with to obtain the best outcomes for the city.	<ul style="list-style-type: none"> • Modify the Plan, including the Design Guide, to support and enable tall landmark buildings within the 'high' part of the Central Area in order to maximise the efficient use of space and other resources. 	Y
			<ul style="list-style-type: none"> • Modify the Plan to include clear reference to the Central Area Design Guide to ensure that it is taken into account when assessing resource consent applications. • To avoid uncertainty and resulting delays in the consent process, the submitter would like to see clearer design parameters or assessment criteria included in the Plan (and the design guide) to minimise the level of subjectivity involved. • That the Council: 1. Amend the Plan to include a mandate for the use of Transferable Development Rights to enable the protection and enhancement of heritage items. 2. Amend the 	

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			<p>Plan to include a mandate for the use of Environmental Compensation to enable the protection and enhancement of heritage items. 3. Amend the Plan to include a mandate for the use of Rates Relief to enable the protection and enhancement of heritage items.</p> <ul style="list-style-type: none"> • Modify or amend the Plan in such other ways so as to give effect to the matters raised in this submission. • Modify the Plan, including the Planning Maps, to exclude the land north of Pipitea Street and the Pipitea Precinct (and such other areas as may be appropriate) from the Central Area Zone. These areas should be rezoned to new or existing zones to recognise their resource management issues, with any necessary changes to objectives, policies, methods and other provisions in the Plan. • Modify the Plan, including the Design Guide, to provide clearer and less subjective design guidance to decision-makers and property developers. • Modify the Plan, including the Design Guide, to encourage and enable buildings to be designed with outdoor living areas projecting over the street without the need for an annual encroachment licence. 	
64	Moir Street Resident's Group Moir Street Mt. Victoria Wellington	The Moir Street Residents Group seek a number of amendments that would maintain or improve their level of amenity as a group of residents living adjacent to the Central Area.	<ul style="list-style-type: none"> • An addition to the excluded activities in 12.2.2.2 for toxic substances and offensive odours. 	N
			<ul style="list-style-type: none"> • We seek an amendment to the rule on windows so that it reads "... shall have privacy glazing that ensures indoor and outdoor privacy for nearby residents. • We support the proposed rules for height control outlined in the plan on the understanding that these have the same effect as the current rules. 	

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			<ul style="list-style-type: none"> Map 32 and 32a show the maximum heights for the Eastern side of Hania Street as being 10.2 metres above ground level. This height limit is unclear on Map 12 as 21 Hania Street is shown in a different colour. An amendment is sought to Map 12 to clarify that the inner residential rules continue to apply to the bulk of 21 Hania Street. 	
63	Geoffrey Edward Palmer 17 Moir Street Mt Victoria Wellington 6011	The submitter seeks a number of amendments to maintain or improve their level of amenity, being a resident living adjacent to the Central Area.	<ul style="list-style-type: none"> An amendment to the rule on windows so that it reads "... shall have privacy glazing that ensures indoor and outdoor privacy for nearby residents". 	N
			<ul style="list-style-type: none"> I support the proposed rules for height control outlined in the plan, on the understanding that these have the same effect as the current rules. Map 32 shows the maximum heights for the Eastern side of Hania Street as being 10.2 metres above ground level. This height limit is unclear on Map 12 as 21 Hania Street is shown in a different colour. An amendment is sought to Map 12 to clarify that the inner residential area continue to apply to the bulk of 12 Hania Street. 	
62	Craig Thomas Palmer 25 Moir Street Mt Victoria Wellington	The submitter seeks a number of amendments to various aspects of the Plan Change.	<ul style="list-style-type: none"> Add the following additional activity to the list found in policy 12.2.2.2; and rule 13.1.1: "Any activity adjacent to an inner residential areas that releases into the atmosphere harmful substances or objectionable odours". 	Y
			<ul style="list-style-type: none"> To ensure that most buildings have a visual connection to the harbour and maximum sunlight, I request that the following statement be added to policy 12.2.5.1: "maintain wherever practical the setting of height limits in stages from low at the water's edge and becoming higher in stages, moving back towards the central area boundaries". That the wording of policy 12.2.5.4 (building height above std specified) be amended as follows: "Any such additional height must be for clearly defined increased public amenity and should be restricted to a comparatively small increase above the 	

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			<p>permitted height limit".</p> <ul style="list-style-type: none"> Expand section 12.2.6.8 to 12.2.6.10 to include the following policies: 12.2.6.X Pedestrian amenity will be ranked as paramount when evaluating controlled, discretionary and non complying activities. 12.2.6.X Covered lanes and arcades are to be encouraged in the central area as a primary means of generating pedestrian amenity. 12.2.6.X Particular attention is to be given to pedestrian amenity and safety within and around the carparks of large retail outlets, such as supermarkets, and outside drive-in takeaway food premises. 12.2.6.X verandahs providing shelter and shade, and in their design using materials minimising earthquake hazards, are to be mandatory throughout the central area, unless covered by a specific exclusion decided after public consultation. That the viewshaft from Kent and Cambridge Terraces northwards to the Overseas Terminal and beyond to the hills on the western side of the harbour be designated as a protected viewshaft. That the maximum height should not be exceeded by not more than 10%, rather than the 35% proposed in rule 13.3.8.14, (and consequential rule 13.4.9.1) as proposed below: "Maximum building height must not be exceeded by more than 10% and only in those exceptional circumstances where there is a clearly defined increase in public amenity. The building mass standard must not be exceeded". I support proposed rules 13.6.3.1.9 and 13.6.3.1.10 on the understanding that they are substantially the same as the existing rules. To add the following text to the window rule (13.6.3.10): "... shall have privacy glazing that ensures indoor and outdoor privacy for nearby residents in the inner residential area" as this will provide greater clarity. 	

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			<ul style="list-style-type: none"> <li data-bbox="1205 260 1883 355">• That the rules 13.6.3.5.1 and .2 and .3 (wind stds) be reworded to set lower thresholds for wind speeds and wind strength, and that they be consistently monitored and enforced. <li data-bbox="1205 363 1883 611">• To add the following new rules to the verandah requirements (13.6.3.6) "Verandahs must also be constructed within and surrounding the carparks of major retail outlets, such as supermarkets, and outside drive-in fast-food premises". The submitter also seeks that verandahs be constructed of materials that do not create a hazard and that all rainwater be piped within or down the facade of the building and underneath the footpath (draft wording supplied). <li data-bbox="1205 619 1883 770">• To extend the Courtenay Place Heritage Area to number 29 on the north side of Majoribanks St and number 20 on the south of Majoribanks St, 20 being on the corner of Lipman Street, as this area includes a number of older wooden shops and restaurants that contribute to a distinctive character. <li data-bbox="1205 778 1883 866">• That the colour on Map 12 for the bulk of 21 Hania Street be changed to ensure that it is clearly within the inner residential area and consistent with maps 32 and 32a. <li data-bbox="1205 874 1883 1090">• That the heights along Kent and Cambridge Terraces be reduced to a maximum permitted height of 14.4m (i.e. 4 storeys) above ground level. The Kent and Cambridge corridor is a part of the city that is in transition. Common height limits along the corridor would create a greater sense of cohesion and allow more sunlight to enhance existing and new buildings along Kent Terrace. <li data-bbox="1205 1098 1883 1273">• With the exception of the Courtenay Place heritage area, the height limits in the blocks from the north side of Courtenay Place through to Cable Street and the Te Papa Museum site be reduced from 27 metres above ground level to 14.4 metres. If this is not supported, as an alternative I suggest a height limit of 18.6 metres. 	

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			<ul style="list-style-type: none"> That the whole of the central area should have a mandatory requirement for verandahs and that the map should be one of defining areas excluded. If this approach is not supported, as an alternative I seek an increase in the number of significant thoroughfares where verandahs need to be a requirement. The decision sought is either to change this map to show exclusions only or alternatively to add the following thoroughfares: Kent and Cambridge Terraces, over the full length; Taranaki Street, both sides over the full length; Lorne and College Streets, the western ends; Majoribanks Street, extend verandahs to number 20 on the south side and number 29 on the north side. 	
61	Malcolm Hunt Associates Level 1, 47 Cuba Street PO Box 11-294 Wellington	The submitter (a noise consultant) recommends a number of changes to the proposed new noise rules.	<ul style="list-style-type: none"> Reconsideration of Rule 13.1.1.1.3 and 13.1.1.3 deletion. 	Y
			<ul style="list-style-type: none"> Deletion of paragraph 5 to the 'explanation' to Policy 12.2.2.4 commencing "Fixed plant noise within the Central Area" and deletion of Rule 13.6.1.1 (Fixed Plant). Use of Leq acoustic parameter rather than L10 for Rule 13.6.2.1.3. 	
60	Lloyd Richardson Ltd C/- Morrison Kent 105 The Terrace PO Box 10-035 Wellington Attn: Ian Gordon	The submitter is opposed to some components of the Plan Change, especially provisions relating to the inclusion of 264-266 Cuba Street in the Cuba Street Heritage Area and the height restrictions within that area.	(a) That this submission be accepted, and Plan Change 48 be accordingly amended by excluding 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the Cuba Street Heritage Area, so that they are subject to the Central Area Rules generally, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (b) That this submission be accepted in part and Plan Change 48 be amended accordingly by enlarging the boundaries of the Central Area Urban Design Guide - Te Aro Corridor to include properties south of 264-266 and 275-283 Cuba Street that are presently included in the Cuba Street Heritage Area around the junction of Tonks Avenue and Cuba and Arthur Streets, and uplifting the Cuba Street Heritage Area from those properties; OR, in the alternative (c) That this submission be accepted in part and Plan	Y

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			Change 48 be amended accordingly by exempting 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the same height restrictions as the rest of the Cuba Street Heritage Area, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (d) Such amendments to the District Plan planning maps as are necessary to give effect to the amendments in clauses (a), (b) or (c) above; and (e) Such other relief that may address the issues raised by this submission.	
59	Livingstones Ltd C/- Morrison Kent 105 The Terrace PO Box 10-035 Wellington Attn: Ian Gordon	The submitter is opposed to some components of the Plan Change, especially provisions relating to the inclusion of 275-283 Cuba Street in the Cuba Street Heritage Area and the height restrictions within that area.	(a) That this submission be accepted, and Plan Change 48 be accordingly amended by excluding 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the Cuba Street Heritage Area, so that they are subject to the Central Area Rules generally, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (b) That this submission be accepted in part and Plan Change 48 be amended accordingly by enlarging the boundaries of the Central Area Urban Design Guide - Te Aro Corridor to include properties south of 264-266 and 275-283 Cuba Street that are presently included in the Cuba Street Heritage Area around the junction of Tonks Avenue and Cuba and Arthur Streets, and uplifting the Cuba Street Heritage Area from those properties; OR, in the alternative (c) That this submission be accepted in part and Plan Change 48 be amended accordingly by exempting 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the same height restrictions as the rest of the Cuba Street Heritage Area, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (d) Such amendments to the district Plan planning maps as are necessary to give effect to the amendments in clauses (a), (b) or (c) above; and (e) Such other relief that may address the issues raised by this submission.	Y

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58	Bright Green Properties Ltd & Get Smart Group Ltd C/- Morrison Kent 105 The Terrace PO Box 10-035 Wellington	The submitter is opposed to some components of the Plan Change, especially provisions relating to the inclusion of 236-242 Cuba Street and 45 Abel Smith Street in the Cuba Street Heritage Area and the height restrictions within that area.	(a) That this submission be accepted, and Plan Change 48 be accordingly amended by excluding 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the Cuba Street Heritage Area, so that they are subject to the Central Area Rules generally, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (b) That this submission be accepted in part and Plan Change 48 be amended accordingly by enlarging the boundaries of the Central Area Urban Design guide - Te Aro Corridor to include properties south of 264-266 and 275-283 Cuba Street that are presently included in the Cuba Street Heritage Area around the junction of Tonks Avenue and Cuba and Arthur Streets, and uplifting the Cuba Street Heritage Area from those properties; OR, in the alternative (c) That this submission be accepted in part and Plan Change 48 be amended accordingly by exempting 264-266, 244-250, 236-242, 257-259, 267-273, 275-283 Cuba Street and 45 Abel Smith Street as identified on the attached plan from the same height restrictions as the rest of the Cuba Street Heritage Area, and by including such new objectives and policies as are appropriate to lay a foundation for such rules. AND (d) Such amendments to the district Plan planning maps as are necessary to give effect to the amendments in clauses (a), (b) or (c) above; and (e) Such other relief that may address the issues raised by this submission.	Y
57	Thow K Tan Unit H – 267-273 Cuba Street Wellington	The submitter opposes the building mass, reduction of building heights and verandah requirements.	<ul style="list-style-type: none"> • Wellington City Council to retain the same maximum building height and building mass for the site and building as per the current District Plan. • We welcome the Council to fully compensate us for the loss of profit due to the maximum building height reduction and building mass requirements. • The Council to fully fund the supply, installation and maintenance of the proposed verandah when the building is renovated and / or redeveloped. 	Y

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56	Prime Commercial Ltd C/- Alexandra McNair Russell McVeagh Level 30 48 Shortland Street PO Box 8/DX CX 10085 Auckland	The submitter (who is particularly interested in the land bounded by Johnston Street, Featherston Street, Brandon Street and Customhouse Quay) is opposed to the plan change to the extent that it may reduce the development potential of that land.	(a) The Plan Change be declined in its entirety. (b) Alternatively, if the relief set out in paragraph (c) above is not granted, that the Plan Change be amended to better enable future development of the Land (i.e. the block bounded by Johnston St, Featherston St, Brandon St and Customhouse Quay). (d) Such further or consequential amendments necessary to give effect to this submission.	Y
55	Housing New Zealand Corp C/- Tonkin & Taylor Ltd PO Box 2083 Wellington	1) HNZN has a number of residential properties / complexes within the identified Wellington Central Area. It is concerned that PC48 will create additional cost and uncertainty for potential house developments within the central area. 2) HNZN opposes the proposed Plan Change as it will remove certainty for property owners / occupiers and will increase the number of resource consents required. The increased consenting requirements will have both monetary and time implications for HNZN, and are considered unnecessary and inappropriate.	<ul style="list-style-type: none"> Retain Rule 13.1.2 wording as currently written. 	Y
			<ul style="list-style-type: none"> Remove Rule 13.3.4 from the plan change and retain the Controlled Activity status for construction or alteration of, and addition to, buildings and structures in the Central Area, as per provisions in the operative District Plan. 	
			<ul style="list-style-type: none"> Remove standard 13.6.3.2 and Council to look at amending the existing standards for wind, heritage and urban design. If a new building mass standard is introduced, Council to remove the proposed standards in PC48 that address wind (13.6.3.5) and sunlight access adjoining residential areas (13.6.3.1.9). 	
54	Primeproperty Group C/- Tonkin & Taylor Ltd PO Box 2083 Wellington	The Submitter opposes Plan Change 48 as it considers the proposed provisions would have a significant adverse effect on the development potential of the city and would create significant uncertainty regarding development, resulting in significant economic impacts. The submitter considers that insufficient justification has been provided for introducing District Plan changes that have such potential to create significant economic impacts. The	<ul style="list-style-type: none"> Retain Objective 12.2.1 and Policies 12.2.1.1 and 12.2.1.2 wording as currently written. 	Y

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		submitter also makes a number of individual points about the proposed provisions.		
			<ul style="list-style-type: none"> • Include a policy regarding the locations within the Central Area that signs are to be encouraged; the definition of 'architectural feature' moved from the Sign Design Guide (page 5) to the definition section of the District Plan; remove the phrase "or any sign located on a structure" from standard 13.6.4.1.5. • Retain Objective 12.2.15 and Policies 12.2.15.10 and 12.2.15.11 wording as currently written. • Retail Objective 12.2.2 and Policy 12.2.2.1 wording as currently written, and introduce a similarly worded objective and policy for the effects of new building works. • Alter the wording of Objective 12.2.5 to more closely reflect the wording of Objective 12.2.2 so that Objective 12.2.5 is encouraging of new building works, provided that adverse effects are avoided, remedied or mitigated, and to include an explanation that performance standards will be applied to control potential adverse effects of activities. • Remove standard 13.6.3.2 and Council to look at amending the existing standards for wind, heritage and urban design. If a new building mass standard is introduced, Council to remove the proposed standards and provisions in PC48 that address wind, heritage and urban design. • Retain the proposed change to policy 12.2.6.4 wording as written. • Retain rule 13.1.2 wording as currently written. • Remove rule 13.3.4 from the plan change and retain the controlled activity status for construction or alteration of, and addition to, buildings and structures in the Central Area, as per provisions in the operative District Plan. • Stout Street Car Parking Centre to be excluded from the Stout Street Precinct Heritage Area and Appendix 7 of Chapter 21 updated to reflect this exclusion. • Item G4.5 of the Central Area Urban Design Guide to be 	

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			amended to refer specifically to the treatment of boundary walls, with allowance given for either (a) the boundary wall to remain blank, or (b) alternative options such as appropriately located and designed signs to be deemed acceptable.	
53	Edmonds Family C/- John Upton Level 6 Castrol House 36 Customhouse Quay Wellington	The submitter opposes the zoning of the former Hotel Cecil site which excludes the part are of bus parking that is under dispute with the Wellington City Council (with that part being left as 'road').	The relief sought is the incorporation of the whole of the former Hotel Cecil site within the Central Area zone. As an alternative relief, the provision of adequate financial compensation for the "taking" of the land for road purposes, with the financial compensation being based on an underlying zoning of Central Area.	Y
52	Globe Holdings Ltd C/- Connell Wagner Ltd 102 Customhouse Quay PO Box 1591 Wellington	The submitter believes the removal of 25% of development potential is overly onerous and will have an impact on the future development of the CBD.	<ul style="list-style-type: none"> It is considered that standards 13.3.8.14 and 13.3.8.15 should be amended to allow for an increase in the discretionary height limits to compensate for the loss of building potential. 	Y
			<ul style="list-style-type: none"> It is submitted that this increase in height should be combined with an increase in the permitted mass of buildings for those parts of the building above the permitted height threshold. This function will provide for additional height without compromising the overall building footprint. 	
51	Arco House Ltd C/- MWH Ltd PO Box 9642 Wellington Attn: Sylvia Allen	The submitter owns and occupies a building which has been listed in the District Plan for some time, and is concerned at the increasing levels of regulation on listed buildings.	<ul style="list-style-type: none"> Deletion of the Cuba Street Heritage Area and all associated policy, rules, guidelines and other provisions from Chapters 12, 13 and 21 of the Plan. 	Y
			<ul style="list-style-type: none"> If the above submission is not accepted, removal of Arco House from Chapters 12, 13 and 21 of the Plan as a listed heritage building. 	
			<ul style="list-style-type: none"> Modifications to the Plan to reinstate earlier provisions, including height limits and controlled activity status for modifications and redevelopment of sites relating to Cuba Street and heritage buildings, and any necessary consequent amendments elsewhere in the Plan documents. 	

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			<ul style="list-style-type: none"> Additional relief including rates relief, grants relating to heritage restoration, and no fees for processing resource consent applications. 	
50	Allen Blair Properties Ltd C/- MWH Ltd PO Box 9642 Wellington Attn: Sylvia Allen	The submitter owns and occupies a building which has been listed in the District Plan for some time, and is concerned at the increasing levels of regulation on listed buildings.	<ul style="list-style-type: none"> Deletion of the Courtenay Place Heritage Area and all associated policy, rules, guidelines and other provisions from Chapters 12, 13 and 21 of the Plan. 	Y
			<ul style="list-style-type: none"> If the above submission is not accepted, removal of buildings and land owned by Allen Blair Properties Ltd from Chapters 12, 13 and 21 of the Plan as listed heritage buildings. Modifications to the Plan to reinstate earlier provisions, including height limits and controlled activity status for modifications and redevelopment of sites relating to Allen and Blaire Streets and heritage buildings, and any necessary consequent amendments elsewhere in the Plan documents. Additional relief including rates relief, grants relating to heritage restoration, and no fees for processing resource consent applications. 	
49	CentrePort Ltd PO Box 794 Wellington	CentrePort generally supports the intent and content of the proposed plan change subject to numerous amendments detailed in the submission.	Implement PC48 as proposed, except where identified in the specific submissions below.	Y
			<ul style="list-style-type: none"> Include an explanation under Policy 12.2.11.1 that recognises subdivisions may occur in the Pipitea Precinct where, due to safety and security concerns, public access along the waterfront may not be provided. Modify the explanation to Policy 12.2.14.6 and 12.1.14.7 to clarify that the rule only applies to parts of sites that are known to be contaminated, or are highly likely to be contaminated, and add a methodology which relates to the definition of "contaminated site" that is currently in the Plan, to enable demonstration of lack of contamination which would then exclude landowners from the rule. 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 261 1890 357">• Add explanation to policy 12.2.15.12 that recognises existing levels of access to the Port and what is provided for by the Masterplan. <li data-bbox="1211 357 1890 437">• Add a section to the explanation of Policy 12.2.15.5 which acknowledges the existing levels of access i.e. the port areas. <li data-bbox="1211 437 1890 628">• Add explanation to Policy 12.2.15.6 to 12.2.15.8 to recognise that the Operational Port Area is exempt from parking limitations, the Masterplan for the Port Redevelopment Area provides for on-street parking and that use of areas for temporary or commuter parking may be an efficient use of the land. <li data-bbox="1211 628 1890 724">• Add one or more paragraphs of explanation to Policy 12.2.2.2 relating to the Port Noise Standard and future Plan provisions relating to port noise management. <li data-bbox="1211 724 1890 820">• Add an explanation to policy 12.2.2.2 (Effects of activities) as to why full control is retained by the Council over office and retail activities in the Pipitea Precinct. <li data-bbox="1211 820 1890 900">• In policy 12.2.4.2, refer to the "future integrated development" of the Pipitea Precinct. <li data-bbox="1211 900 1890 995">• In policy 12.2.4.2 and methods below, refer to "masterplanning", as a process, rather than "masterplan" as an object. <li data-bbox="1211 995 1890 1075">• In the explanation below policy 12.2.4.2, second paragraph, add "most of" before "the operational port area". <li data-bbox="1211 1075 1890 1187">• Add an additional paragraph of explanation following the second paragraph that explains the extent of the masterplanning necessary to accompany an application (draft wording supplied). <li data-bbox="1211 1187 1890 1369">• Add at the end of paragraph 5 of the explanation to policy 12.2.5.2, the following: "Similarly, the masterplan for the Port Redevelopment Precinct makes provision for building mass in a way that ensures that the effects of new building work are avoided. Therefore no building mass limits apply within this Precinct". 	

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			<ul style="list-style-type: none"> • Delete the second sentence in the second paragraph of explanation under policy 12.2.5.5, as there may be circumstances where an overheight building in the low city is appropriate. • Modify the wording of the wind policies (12.2.5.6 to 12.2.5.9) and explanation as follows: In policy 12.2.5.6 change the last word to "practicable". Add at the end of policy 12.2.5.9 "or are provided in public space adjacent to it". Delete the words "are enforced to" in the third paragraph of the explanation. In paragraph 6 of the explanation, add between the words in brackets "and", the words "or are adjacent to it". Change the wording of the final sentence of this paragraph to say "development may not be an appropriate response". • Add masterplanning as a further bullet point to the Methods listed in policy 12.2.6.18, and add to the explanation wording to the effect that future parking areas are provided for in the Masterplan for the Port Redevelopment Precinct. • Add mention of colonnades as an acceptable alternative to verandahs in the explanation accompanying the verandah policies (12.2.6.8 to 12.2.6.10). • Add an exemption similar to that in rule 13.6.3.1.1 to the Explanation in Appendix 10. • Delete the words "refuse collection" in Appendix 12. • Change appendix Maps 02 as in the plan attached to this submission labelled Appendix 02, and modify extent of the masterplan on 02A to match. • Modify the wording of the masterplan text in appendix 02 to replace the word "site" generally throughout the word "area". Similarly, the word "shall" should be replaced with the word "will". • Delete the section relating to the Ferry Plaza in the Masterplan verbal description within Appendix 2. • Amend appendix 02 to note that Shed 35 Park "may" (rather than "will") contain a water feature. 	

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			<ul style="list-style-type: none"> • Sort out Appendix 5 to clarify how it applies to port noise. • Review Appendix 9 to include more realistic masterplanning requirements, including in particular the matters under the headings "Spatial Extent" and "Matters to be Included in the Masterplan". • Make changes to the Map in appendix 03 to exclude land in the coastal marine area. • In respect of rule 13.1.1 make the following changes: Add at the end of bullet point 2, the words "except where exemptions stated in that section apply", or similar. Add at the end of bullet point 3, the words "except where it can be demonstrated that risk of contaminant release is low", or similar. Add the words "and the Port Redevelopment Precinct" after the Operational Port Area in bullet point 5. Add the words "except for office activities associated with operational port purposes" after "activities". Note that an amendment to the definition as sought in submission 4, would be a satisfactory alternative outcome. Number the bullet points. • The margin note associated with rule 13.1.2.1 needs to acknowledge that offices for operational port activities are exempt. • The margin note associated with 13.1.2.2 appears to apply a restriction to the Operational Port Area. Note that the Operational Port Area is largely in the Pipitea Precinct, but also includes part of the Port Redevelopment Precinct. • Amend the second bullet point by adding the words "except where such land provides a balance lot only", or similar wording. • Add after the word "substances" in Rule 13.2.1 the words "except where exemptions apply in that section", or similar wording. • Exclude the Port Redevelopment Area from Rule 13.2.3.2 in its entirety. Delete Rule 13.2.3.4 and replace it with a note, or a reference to the information requirements. Modify the 	

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			<p>information requirements to provide for the intent of the rule.</p> <ul style="list-style-type: none"> In rule 13.3.1 add, after the word "Precinct", the words "(where such parking is permitted)", or similar wording. Add after the first closed bracket in Rule 13.3.10 the words "except as provided for as a permitted activity in Rule 13.1.4" or similar words. Delete all words after "structure", in Rule 13.3.10.2. Modify rule 13.3.11 to provide for the situation where only areas of land that are known to be, or have a high likelihood of being contaminated are subject to its provisions. In rule 13.3.4 add at the words "Except in the Port Redevelopment precinct ...", at the start of Rule 13.3.4.2, or similar wording. In rule 13.3.8 add ", Controlled" after "Permitted", in the Rule, or similar wording. Add the words "Except in the Port Redevelopment Precinct" at the start of Rule 13.3.8.5. Either modify the percentage height discretion in rule 13.3.8 to a flat height discretion of 16 metres throughout the Central Area, or provide this discretion throughout the Operational Port Area and the Port Redevelopment Precinct. Provide a separate condition in rule 13.3.8 which relates only to height (and not to building mass) within the Port Redevelopment Precinct, taking into account the proposal above. Delete rule 13.3.8.16, or provide the same discretionary condition as elsewhere in the Port Redevelopment Precinct and the Operational Port Area, or modify in line with the outcome of the submission above. Add the words "and the Port Redevelopment Precinct" before the final closed bracket in rule 13.4.2, or wording of similar intent. 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 261 1883 357">• Add either the word "relevant" or the word "appropriate" before "masterplan" in rule 13.4.7.1, or other modifications to achieve the outcome sought. <li data-bbox="1211 357 1883 453">• In relation to rule 13.4.9, that the Council correct reference to rules (8 instead of 9), and align rule 13.4.9.1 with outcome of CentrePort's submission 26. <li data-bbox="1211 453 1883 549">• Exempt activities and plant within the Operational Port Area and the Port Redevelopment Precinct from the requirements of Rule 13.6.1.1. <li data-bbox="1211 549 1883 708">• Reduce the height clearance required by rule 13.6.1.3.8 to relate to a specified maximum sized vehicle using the service area (e.g. if only to be accessed by courier vans the height would be lower - based on say 1 metre clearance above the largest vehicle to be using the space). <li data-bbox="1211 708 1883 804">• Add the word "individual" before site in Rule 13.6.1.3.15, or add a note that clarifies that this limit does not apply to future road intersections. <li data-bbox="1211 804 1883 884">• In rule 13.6.1.3.17 exclude the Port Redevelopment Precinct from the rule in respect of all but arterial streets. <li data-bbox="1211 884 1883 932">• Implement specific provisions relating to port noise. <li data-bbox="1211 932 1883 1027">• Modify the provisions of rule to provide for the Port Noise Standard approach to noise management of port related activities. <li data-bbox="1211 1027 1883 1123">• Add the words "or passenger" between "cargo" and "handling" in Rule 13.6.3.1.1 (consistent with wording in Rule 13.6.3.3.2) or similar wording. <li data-bbox="1211 1123 1883 1203">• Specifically, exclude the Port Redevelopment Precinct for the need to comply with the provisions of rule 13.6.3.2. <li data-bbox="1211 1203 1883 1267">• Replace viewshafts 26 and 27 with Viewshafts 17, 18, 19 and 21 in rule 13.6.3.3.2. 	

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			<ul style="list-style-type: none"> • CentrePort seeks review and modification of the wind provisions (rule 13.6.3.5) to realistically reflect Wellington's robust wind circumstances, and to provide a more cost effective means of assessing changes in terms of wind effects. • Provide for colonnades as an alternative to verandahs in Rule 13.6.3.6 or in the definition of verandah, in consistency with the content of Appendix 2. • Modify subdivision provisions including Rules 13.6.5 and 13.3.10 to allow for subdivisions within the Port Redevelopment Precinct as a Discretionary (Restricted) Activity subject to general compliance with the masterplan in Appendix 9. • Add at the end of the definition for 'Office Activities' (within the Pipitea Precinct) the words "... other than those associated with Operational Port Activities". • Modify the wording at the end of the second paragraph of section 3.2.2.14 (wind information requirements) to read "... against any building which existed within the previous 3 years". • Add at the start of the last bullet point in section 3.2.2.15 the words "where a consent is required within the Pipitea Precinct, the effect ...". • That numerous minor typographical corrections be made throughout the Plan Change. • Amend Map 12 to show the correct coastal marine area boundary. CentrePort also seeks an amendment to the boundaries of the Operational Port Area and the Port Redevelopment Precinct (see submission 43). • Amend Map 15 to show the correct coastal marine area boundary. • Amend Map 15 to show the correct extent of the Pipitea Precinct. • Amend Map 17 to show the correct coastal marine area boundary. 	

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			<ul style="list-style-type: none"> • Amend Map 17 to show the correct extent of the Pipitea Precinct. • Amend Map 18 to show the correct extent of the Pipitea Precinct. • Map 32 needs to show the correct coastal marine area boundary. • Replace the boundary delineation for the Central Area on the Maps referred to, or clarify the boundary of the Central Area in some other way. • Modify the map on page 1 of the Central Area Design Guide to align with changes requested in other parts of CentrePort's submissions. • Delete the footnote on page 23 of the Central Area Design Guide. • Add at the end of the final bullet point on page 5 of the Central Area Design Guide words "the blocks shown in the masterplan for the Port Redevelopment Area (Chapter 13, Appendix 02A) are considered appropriate for this area" or similar wording. 	
48	The Architectural Centre Inc PO Box 24178 Wellington Attn: Christine McCarthy	The Architectural Centre gives overall support for the Central Area Review with some amendments. We fully support the council's stated commitment to "achieving high quality built form and urban design results throughout the central area".	<ul style="list-style-type: none"> • While we support the sound design of subdivisions, we are not sure why subdivision design is an issue for the Central Area (12.2.11.1). If subdivisions are to occur within the Central Area we suggest the Subdivision Design guide is more relevant than the Central Area Design Guide. 	Not Specified
			<ul style="list-style-type: none"> • We support the aim to improve access by public transport etc (12.2.15.1), but also see a need to protect existing and future rail links, for example waterfront trams or light rail routes. • We support the conflation of character and heritage areas, and the inclusion of three new areas. The submitter requests the addition of an Eva/Egmont Heritage Area including the buildings on Eva Street, Dixon Street, Egmont Street and Ghuznee Street. This area contains some of the city's oldest buildings and some very good examples of re-use of heritage buildings. 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 261 1883 320">• The appendix 3 map is difficult to read and needs stronger hatching to denote heritage areas. <li data-bbox="1211 341 1883 459">• We support the reduction of the maximum height in these Heritage Areas but do not support the notion of maximum heights as "starting points". Maximum heights should be maxima not starting points. <li data-bbox="1211 469 1883 619">• We are particularly concerned about the developer "carrot" that if the over height building "makes a positive contribution to its heritage neighbours" breaches of height will be approved. The council needs to encourage the idea of all buildings, regardless of height, making a positive contribution to the city. <li data-bbox="1211 628 1883 1177">• Supports concept of Port Redevelopment and Pipitea precincts but makes several suggestions to ensure the outcomes desired are achieved; including: - Economic impact report for Port Redevelopment area as well as Pipitea Precinct. - Measures to ensure mixed use occurs in these areas. - Adopt the objectives used for the Lambton Harbour Area to the Port Redevelopment and Pipitea Precincts. Those three waterfront areas should be considered together and the Waterfront framework extended to cover these two additional areas. - An esplanade should be a minimum of 20m, rather than a maximum. - Reconsider the 'controlled activity status' of development in the Port Redevelopment Area. They should be 'discretionary restricted activities'. - That the council initiate an open and public competition for future use of Pipitea Precinct. The Port Redevelopment Precinct Masterplan also needs to be upgraded so the text of the Masterplan is readable, and the reference in the following pages to various parts of the public space (such as Boulevard etc) make sense. <li data-bbox="1211 1187 1883 1273">• The aerial photographs used in the Chapter 13 Appendices need to be updated (i.e. Appendix 01, 02). Appendix 02A (Port Redevelopment Precinct Masterplan). <li data-bbox="1211 1283 1883 1337">• We also note that the naming of the Precinct in the Appendix 1 map is incorrect (Appendix 1 Pipitea Precinct page 1), 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 261 1890 384">• We strongly endorse the move towards a volume measurement rather than a building height maximum system, especially in conjunction with a 75% site coverage and the definition for building mass where it excludes ESD initiatives. <li data-bbox="1211 384 1890 480">• That the council maintain a flexible approach to height in respect of shadows cast on roads or sloping hills and other areas. <li data-bbox="1211 480 1890 576">• We are very concerned about possible increases in building height in the low city, particularly in relation to the overall mixed-use character of the Central Area. <li data-bbox="1211 576 1890 639">• We support the proposed change to the use of permitted baselines. <li data-bbox="1211 639 1890 831">• We do not agree that "the development of landmark buildings is generally not appropriate in heritage areas as these areas already have a strong character and a sense of place derived from the existing building stock". We believe that strong design in the vicinity of acknowledged heritage buildings is a productive addition to the area, and should not be discouraged. <li data-bbox="1211 831 1890 927">• Concerned that the proposed rezonings along the by-pass will have the effect of turning the bypass into a dividing line, limiting the integration of the bypass into the city fabric. <li data-bbox="1211 927 1890 1310">• We support the objective that over height buildings must "provide an urban design outcome that is beneficial to the public environment" (12.2.5.4), but we also consider that this need to provide a positive public contribution to the city (e.g. high quality EDS, public amenity, public access) also needs to be also be strongly stated in 12.2.5.5 and this should be prioritised over a generic notion of "design excellence". We believe that high qualities of external appearance, contribution to streetscape, good massing and public interface should be normal expectations for buildings in Wellington city. The term 'design excellence' is also vague and potentially subject to abuse. <li data-bbox="1211 1310 1890 1347">• We support the initiatives for the revised wind rules. 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 264 1890 491">• In respect of ground floor active frontages we seek that the District Plan should also explicitly ban residential use and carparking on the ground floor of Central Area multi-storey developments. The location of these on the ground floor kills the street, and provides a poor outlook and lack of privacy for residents. Neither promotes positive public interfaces with the building. <li data-bbox="1211 499 1890 651">• We suggest the addition of more viewshafts (appendix 11) namely the views: (i) of Carillion from Mt Victoria tunnel; (ii) from the harbour (along Whitmore Street) to the Beehive; (iii) from Oriental Parade to St Gerald's; (iv) along Lambton Quay towards Willeston Street toward MLC and the old BNZ. <li data-bbox="1211 659 1890 746">• We support the updating of the verandah network to ensure practical passage through key parts of the city for pedestrians in inclement weather. <li data-bbox="1211 754 1890 906">• We suggest the addition of a new type of open space category be defined and allocated to maintain established 'through block' pedestrian thoroughfares located on private land, and to encourage a city which is particularly permeable for pedestrians. <li data-bbox="1211 914 1890 1332">• We strongly support the development of policies to promote sustainable design features and energy efficiency in the use and construction of buildings. We recommend that 12.2.7 be altered so it expires within a year to be replaced by more detail, including targets for energy-efficiency and timeframes as to when new buildings must achieve such targets. We also recommend that the council notify all commercial developers and architects in Wellington of examples of recent energy-efficient buildings (such as CH2, Melbourne). We also recommend the council institute an annual award to acknowledge the best local examples of energy-efficient new building and retro-fitted building, and to promote local developers and architects who lead this field of design in Wellington. 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 264 1890 384">• We support the requirement that amenity is required to be built on site for residential developments. We likewise suggest that other commercial developments (e.g. office buildings) also require on site amenity to be designed for. <li data-bbox="1211 389 1890 695">• In respect of the Lambton Harbour Areas and the Wgtn Regional Stadium the submitter considers that North Queens Wharf should be named Kumutoto (also 12.2.8.6). They also note the reference to NZS 4121:2001 (12.2.8.1) and consider that this is equally relevant to all aspects of public space covered by the Central Area Review. Likewise we support a more comprehensive adoption of the objective to "recognise and provide for developments and activities that reinforce the importance of the waterfront's Maori history and cultural heritage" (12.2.8.5). <li data-bbox="1211 700 1890 1187">• We support the updating of the public spaces protected for sunlight access (appendix 7 Sunlight Protection of Listed Public spaces), but strongly encourage the council to add Swan Lane to this list, and anticipate its use as a future public park. We also consider that the time periods for protecting sunlight are too limited (13.6.3.4 Sunlight Protection). Sunlight is important to urban spaces beyond midday and lunchtime, especially with increasing numbers of inner city residents who wish to use these spaces at other times of the day and at the weekends. The appendix (Appendix 7 Sunlight Protection of Listed Public Spaces) is mostly clear and understandable, however we recommend: A) the addition of Swan Lane to the list; b) enlarging Te Aro Park, Clock Park and Kumutoto Plaza, and c) updating photographs on Kumutoto Plaza and Taranaki St Wharf (and superimposing the new architect's masterplans over the top). 	

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			<ul style="list-style-type: none"> <li data-bbox="1211 261 1883 453">• Commercial Sex activities are listed under permitted activities (13.1.1), and reference is made to see rule 13.4.2. This appears to be a typographical error as 13.4.2 is for the creation of parking areas, the reference should be to 13.4.2, where it notes Sex activities as Discretionary Activity (unrestricted) which contradicts the former. <li data-bbox="1211 453 1883 580">• The submitter considers that the noise insulation standards are too low (appendix 6 Noise Insulation Construction Schedule). The submitter suggests a number of alternatives. <li data-bbox="1211 580 1883 708">• We found that the diagrams defining building mass (13.6.3.2.1) are too small and so not readable. We suggest that diagrams of formulas A, B, C etc should also be included to assist in clarity. <li data-bbox="1211 708 1883 804">• The submitter found that the diagram regarding height control at St Paul's is unreadable (Building and Structures Standards 13.6.3.1.7 height control at St Paul's). <li data-bbox="1211 804 1883 1027">• The section on maximum building height and mass (13.3.8.14/15) needs to be cross referenced to the relevant Appendix regarding Mass (13.6.3.2) and must be made clearer. This is potentially most important rule yet the wording is currently open to confusion. Greater clarification should be provided as to when provision of rooftop features and atria might warrant consideration of an increase in building mass. <li data-bbox="1211 1027 1883 1187">• The submitter considers that hospitality, as an important industry in the Central area, needs to be explicitly acknowledged in the plan. In many instances (e.g. 12.1.3, 12.2.1.2,) hospitality is excluded as an important inner city function. <li data-bbox="1211 1187 1883 1331">• We support proposals regarding urban design but note that generally the chosen photographs seem inappropriate, esp. pp 9, 15, 17, 18, 23 and particularly 19, and that the five distinct areas (Central Area Urban Design guide page 3) need to be aligned or coordinated with the four 'quarters' of the city. 	

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			<ul style="list-style-type: none"> That signage needs to be considered in relationship to the building and to the street. 	
47A	Sharma Family C/- The Wellington Company 50 Manners Street PO Box 24 379 Wellington Attn: Andrew McCarthy	The Wellington Company Asset Management Limited managers city commercial office space on behalf of this owner and makes a submission on their behalf.	<ul style="list-style-type: none"> Revise the current zoning for the Port Redevelopment Precinct to discourage further office development in this area as it may dilute the unique character of the CBD. 	N
			<ul style="list-style-type: none"> The City Council should look to accommodate larger scale retail units in the new Pipitea Precinct as the CBD is unable to satisfy such land requirements at present. The area should not be viewed as "overspill" for the Harbour Quays development. We welcome the positive step of introducing new policies to adopt sustainable design features in new buildings. We would also encourage the Council (possibly in conjunction with other bodies such as EECA, the Green Building Council) to encourage current building owners to review their existing properties and implement energy efficiencies and sustainable design features where possible. This could be through education or some form of incentive (financial or a rating system). While welcoming the proposed changes to Urban Design in principle, we have reservations as the level of discretion the city council will gain from this proposal. A high degree of objectivity measures in the guide is required to mitigate potential personal bias creeping into decisions. 	
47	The Wellington Company (for others) 50 Manners Street PO Box 24 379 Wellington Attn: Andrew McCarthy	The Wellington Company Asset Management Limited managers city commercial office space on behalf of 28 owners and makes a submission on their behalf.	<ul style="list-style-type: none"> Revise the current zoning for the Port Redevelopment Precinct to discourage further office development in this area as it may dilute the unique character of the CBD. 	N

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> The City Council should look to accommodate larger scale retail units in the new Pipitea Precinct as the CBD is unable to satisfy such land requirements at present. The area should not be viewed as "overspill" for the Harbour Quays development. We welcome the positive step of introducing new policies to adopt sustainable design features in new buildings. We would also encourage the Council (possibly in conjunction with other bodies such as EECA, the Green Building Council) to encourage current building owners to review their existing properties and implement energy efficiencies and sustainable design features where possible. This could be through education or some form of incentive (financial or a rating system). While welcoming the proposed changes to Urban Design in principle, we have reservations as the level of discretion the city council will gain from this proposal. A high degree of objectivity measures in the guide is required to mitigate potential personal bias creeping into decisions. 	
46	Save our Streets Level 5 175 Victoria Street Wellington Attn: Natasha Naus	Save Our Streets supports the Proposed Plan Change 48 and proposes some amendments to further enhance the heritage area provisions.	<ul style="list-style-type: none"> Enhance 'sense of place' to remove the phrase 'jinky character areas', as the word 'jinky' is unclear and may be inappropriately defined. 	Y
			<ul style="list-style-type: none"> To affirm that development and changes to the urban environment that are inappropriate and/or insensitive to the values of heritage resources or the setting of heritage resources should not be encouraged. To require that all development proposals be assessed for their potential direct or indirect effects on heritage resources and/or the character of an area, including the setting of heritage resources, with particular regard given to the possible aggregate effects of similar developments, including potential effects of similar future development. 	

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			<ul style="list-style-type: none"> To require that all development proposals that may impact on heritage resources and/or the character of an area be open to public submission. Reject any submissions that have the potential to reduce the effectiveness of PC48 to protect heritage values. To reject any proposed amendment to the proposed height limits, other than a reduction in the maximum heights proposed. 	
45	ING Property Trust No 1 Ltd C/-Spencer Holmes Ltd 8 Willis Street PO Box 588 Wellington Attn: Ian Leary	ING Property Trust owns a number of buildings in the Central Area, some of these being heritage buildings. ING's submission is primarily that of "preserving" or maintaining the development rights that exist under the current District Plan and ensuring that the new changes do not unreasonably disadvantage it in terms of future development options.	<ul style="list-style-type: none"> The submitter seeks a number of amendments and deletions from PC48. These are summarised, with full "suggested rewording" to be found in the original submission. 	Y
			<ul style="list-style-type: none"> Amend policy 12.2.5.1 to include reference to construction noise (wording supplied). Delete explanatory text to policy 12.2.5.1 regarding height control in heritage areas. New text also suggested for this topic (wording supplied). Policy 12.2.5.10 is supported, but notes changes should be made for sites adjacent to heritage items, as any permitted baseline scenario is extinguished by the proposed new heritage provisions. Insert text to policy 12.2.5.2 to clarify how daylight effects are managed. Delete references to heritage areas. Supports policy 12.2.5.4 to a degree, but seeks changes to the bulk and location rules/mechanisms that flow from this policy. Seeks the deletion of explanatory text in policy 12.2.5.9 relating to free standing wind mitigation measures. 	

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			<ul style="list-style-type: none"> • Delete text from explanatory statement in policy 12.2.6.2 regarding the inappropriateness of landmark buildings in heritage areas. • Support the intention of policy 12.2.6.3, but not the mechanisms that flow from the policy. Specific provisions for each heritage area should be developed. • Delete the word "any" from policy 12.2.6.5. Add the word "important" before the words "public open spaces" in the last paragraph of the policy explanation. • In policies 12.2.6.6 and 12.2.6.7 clarify that the activity classification referred a discretionary RESTRICTED Activity. • Delete all references to building mass from rules 13.3.4, 13.3.6, 13.3.8 and 13.4.9. The concept of building mass is not supported and the submitter believes the Central Area design guides can be used to achieve the same outcome. • Seeks that the existing building heights be maintained and proposed heritage area height regimes deleted. • Clarify wording of the vehicle access standard (13.6.1.3.14) as outlined in submission. • Delete height control rules in heritage areas. • Delete references to heritage areas and building mass from standard 13.6.3.2. • The change in approach to wind provisions to refer to 'hours' is supported, but the trigger points are too low compared with existing wind thresholds. The 2.5 mls and 3.5 mls should be at least doubled. • Delete the building mass definition (and any related definitions) as the proposed building mass provisions are not supported. • Delete first paragraph of policy 12.2.10.3 explanation (signage) and considers that protection from visual effects of signage from all public spaces is excessive, but that it is appropriate for adjoining residential areas. 	

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44	Susan Hitchiner 5 Moeller Street Mt Victoria Wellington 6001	The submitter supports the overall philosophy of District Plan Change 48, with a small number (4) of amendments.	<ul style="list-style-type: none"> Amend the narrative in objective 12.2.5 and policy 12.2.5.1 of the District Plan to be more explicitly about the heritage area expectations. 	Y
			<ul style="list-style-type: none"> Confirm that the expression of 'permitted baseline' contained in policy 12.2.5.10 of the district Plan robustly overrides the related case law. Categorise any application for development within a heritage area as a discretionary (unrestricted) activity, rather than only those that fall outside the range created by the stated height limits. Further, amend Rule 13.4.8 (or any replacement of it) to establish an explicitly expectation that any such application be publicly notified. Shift the boundary to the eastern side of Swan Lane to include it within the Cuba Street Heritage Area. 	
43	Museum Hotel Properties Ltd	Submitter seeks amendments to Chapter 13 provisions and to definitions.	<ul style="list-style-type: none"> Delete rule 13.3.8.15 relating to discretionary increases in building mass. 	Y
			<ul style="list-style-type: none"> Modify 13.6.3.2.1 so that the building mass factor is 100%. This will leave the current position as is but allow the new height rules 13.3.8.14 to work effectively. Define Public Environment to exclude loss of amenity to adjacent building owners or strata title owners. 	
42	The Wellington Company Level 12 50 Manners Street Wellington Attn: Ian Cassels	While the submitter generally supports PC48, the submission requests that Plan Change 48 be amended so that each of the various topics - containment, height controls, heritage, new precincts etc are all determined as to how well they contribute to the "mixed use, sustainable and intensified" city.	<ul style="list-style-type: none"> Concessions and incentives required for existing and new initiatives relating to environmental sustainability with existing established city locations preferred. 	Y
			<ul style="list-style-type: none"> Building height within the CBD should be unlimited. Recognition should be given that the intensification of the city, out weighs potential negative effects including shading, heritage, wind etc. 	

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			<ul style="list-style-type: none"> • Building Height in Te Aro: each block ought to permit a single tall structure (10-16 storeys) on the basis that it does not dominate the block (i.e. no greater than 15% of the plan area of the block). • Building height in Harbour Quays, Thorndon and Pipitea should be proscribed as to use. Mixed use within any one block or development needs to be the overriding consideration so that the needs of the local environment are balanced with the benefits available to the city (and region) through central city intensification. Residential use in these locations need to be more intense and much greater height concessions are required than presently indicated. 	
41	Telecom New Zealand Ltd PO Box 293 Wellington	The submitter has concerns with the proposed fixed plant noise rule. Generally noise emitted from telecommunication facilities complies with the provisions of the operative District Plan. While no evidence is provided that these facilities have resulted in a noise nuisance, the effect of the Proposed District Plan Change is that a number of facilities now require resource consent, with costs, potential delays and uncertainties associated with this process.	Either that the proposed definition of 'Fixed Plant' in Chapter 3 and Rule 13.6.1.1 be deleted; or such other relief to like effect to remedy the submitters concerns; and any consequential amendments necessary as a result of the amendments to grant the relief sought above.	Y
40	Craig Erskine Level 13 1 Willeston Street Wellington	The submitter expresses concern at the amount of discretion council has now over new buildings, given the change in activity status to discretionary restricted. The submitter is also very concerned at the proposed signage rules and that the sign design guide is unnecessary.	<ul style="list-style-type: none"> • Transfer rules 13.3.4 and 13.3.8 into 13.2 so that these activities (i.e. construction of buildings) remain a Controlled Activity. • The Design Guide for Signage be deleted. The objectives and policy relating to signs be amended so that they are more realistic and achievable. Clarification on how Rule 13.3.9 is to be implemented. 	Y

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39	Ministry for Culture & Heritage C/- Opus International Consultants PO Box 12003 Wellington Attn: Andrew Noble	In this submission the Ministry for Culture and Heritage seeks to ensure that any potential development of the proposed National War Memorial Park on land to the north of the National War Memorial on Buckle Street is reflected by Proposed District Plan Change 48 - Central Area Review, and furthermore that the outcome of the review supports any development of the proposed National War Memorial Park to ensure that this significant open space area is developed for the benefit of all New Zealanders.	<ul style="list-style-type: none"> The proposed National War Memorial Park is reflected in Proposed District Plan Change 48. 	Y
38	John Ewen Feast 10/38 Molesworth Street PO Box 2887 Thorndon Wellington	The main thrust of this submission is to ensure the review recognises Wellington's advantage and strong point of different is its intensity of development and compactness. The city has to recognise that the universal criticism of our City is the weather. Let's recognise this and do our best to further intensify and "weather-proof" our City to a much higher standard to make it even better than it is not. The submitter comments on the Port Redevelopment Precinct, new 'Pipitea' Precinct, the Thorndon office area and the proposed building mass / height provisions.	<ul style="list-style-type: none"> More encouragement should be given to ensure the Thorndon office area retains its colonial character and heritage with people in the area 24 hours a day and seven days a week. Office building sizes, height and mass should be reduced in this precinct and site / mass bonuses should be given for developers increasing the retail and residential components within the precinct. 	Y

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			<ul style="list-style-type: none"> <li data-bbox="1211 264 1883 384">• A rezoning of the Port Redevelopment Precinct to prevent further office development and to encourage a mixed use environment in which the office component has already been met. <li data-bbox="1211 400 1883 831">• Not only should all office development in this very remote "Pipitea Precinct" require consent and economic impact reports, office construction in this precinct should be prohibited unless: (i) It is an accessory to a much greater use within the particular use being developed on any site within the precinct. (ii) The floor plate size is greater than any site can accommodate within the CBD; i.e. the requirement must be for a special purpose building. (iii) The "use" or "user" is not a "natural" CBD use or user who would otherwise be located within the CBD if this new precinct was not available. 2) The City Council should give preference to large scale uses including bulk retail which cannot otherwise be accommodated in the CBD because of the relatively small lot sizes and cost of amalgamating large inner-city sites which prohibit some developments. <li data-bbox="1211 911 1883 1070">• An expert panel should be constituted to consider requests for all use of discretion, not WCC personnel who need to focus on reports to that expert panel for consideration. This should remove much of the heat which a Council Planning Officer might engender. <li data-bbox="1211 1086 1883 1182">• CentrePort required to promote of "scale of use" developments within the Port Redevelopment Precinct which cannot elsewhere be accommodated because of site size limitations. <li data-bbox="1211 1214 1883 1310">• A ban on developments within the Port Redevelopment Precinct which would, but for this land, be otherwise accommodated in the core CBD. 	

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> • A requirement for CentrePort to install attractive links within the Port Redevelopment Precinct, protecting users from the weather and providing a positive Wellington experience rather than creating a zone which will remain isolated by distance and whether from the CBD and which will turn people • A requirement to maintain extensive "gaps" between buildings in the Port Redevelopment Precinct to provide view shafts to the harbour for the general public. • The City Council encouraging uses which link with the Stadium to provide a better experience between the Stadium / Aotea Quay and visiting liners, the Wellington waterfront at Lambton Harbour through to Te Papa and Courtenay Place. • That the Harbour Quays developer be required to carry out extensive landscaping with tree planting and gardens to tie in with the CBD. 	
37	Martin Hibma 22 McFarlane Street Mt Victoria Wellington	The submitter has concerns with the calculation used for the discretionary height allowance and seeks consistency between the high city and low city areas.	Amend DPC48 to change the application of discretionary height allowance in the High City from height above mean sea level to height above ground (building height as defined in building mass calculations).	Y
36	St Johns in the City Council C/- AR Marshall Gault Mitchell Lawyers Level 4, 22 The Terrace PO Box 645 Wellington	The submitter has created and it continues to care for the St Johns Heritage Precinct Area and the proposed controls are neither necessary nor desirable.	<ul style="list-style-type: none"> • 1) amend 13.3 discretionary activities (restricted) so that any activities which do not comply with either 13.6.3.1.5 or 13.6.3.1.6 are discretionary activities (restricted) AND include rules so they must be processed without public notification under section 93 or service under section 94 RMA. 2) Amend 13.4 discretionary activities (unrestricted) so any activities which do not comply with 13.6.3.1.5 and 13.6.3.1.6 are not discretionary activities (unrestricted) 3) Amend all related provisions so they are consistent with these amendments sought. 4) Such further or incidental relief as may be appropriate. 	Y

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> In relation to the sign provisions; 1) Amend Objective 12.2.10, Rule 13.1.3, Rule 13.3.9 and Rule 13.6.4 to include express provisions that notwithstanding anything else in the District Plan they apply to all heritage buildings, heritage precinct areas and that in the event of conflict with other parts of the District Plan these provisions apply. 2) Amend all related provisions so they are consistent with this request. 3) Such further or incidental relief as may be appropriate. 1) Delete 13.6.3.1.5 and all related provisions so the height limits for all buildings in heritage areas are as shown on Central Area Map 32 and exercise control on additions and alterations through the heritage provisions in Chapters 20 and 21. 2) Such further or incidental relief as may be appropriate. 1) Delete 13.6.3.1.6 which contains minimum and maximum height controls for non heritage buildings in heritage areas so that the building heights shown on Central Area Height Map 32 and the related provisions in the District Plan apply to the non heritage buildings. 	
35	Huddart Parker Ltd C/- G Tong Chapman Tong Law 29 Brandon Street PO Box 10614 Wellington 6143	The submitter owns a building within the proposed Post Office Square Precinct Heritage Area. The submitter considers DPC48 is inherently unfair as it will impose significant restrictions on the use of land and buildings. In particular, the Heritage Area, building mass and sunlight provisions are unjustified. The change of activity status for new buildings (to discretionary restricted) is unnecessary and undesirable. The section 32 report is also seriously deficient.	<ul style="list-style-type: none"> 1) Amend 13.3 discretionary activities (restricted) so that any activities which do not comply with either 13.6.3.1.5 or 13.6.3.1.6 are discretionary activities (restricted) AND include rules so they must be processed without public notification under section 93 or service under section 94 RMA. 2) Amend 13.4 discretionary activities (unrestricted) so any activities which do not comply with 13.6.3.1.5 and 13.6.3.1.6 are not discretionary activities (unrestricted). 3) Amend all related provisions so they are consistent with these amendments sought. 4) Such further or incidental relief as may be appropriate. 	Y
			<ul style="list-style-type: none"> Delete 13.6.3.1.5 and all related provisions so the height limits for all buildings in heritage areas are as shown on Central Area Map 32 and exercise control on additions and alterations through the heritage provisions in Chapter 20 and 21. 2) Such further or incidental relief as may be appropriate. 	

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> • Delete 13.6.3.1.6 which contains minimum and maximum height controls for non heritage buildings in heritage areas so that the building heights shown on Central Area Height Map 32 and the related provisions in the District Plan apply to the non heritage buildings. 2) Such further or incidental relief as may be appropriate. • 1) Reduce the extent of the Post Office Square Heritage Precinct Area by excluding the submitter's building (Huddart Parker building), the Intercontinental Hotel, the Chapman Tripp Building and the Todd Corporation Building. 2) Identify the submitter's building as non heritage building. 3) Such further or incidental relief as may be appropriate. • 1) Reject all of DPC48; 2) Such further or incidental relief as may be appropriate. 	
34	Capital Properties NZ Ltd C/- A Robinson PO Box 1690 Wellington	The submitter owns a building within the proposed Stout Street Heritage Area. The submitter considers DPC48 is inherently unfair as it will impose significant restrictions on the use of land and buildings. In particular the heritage area, building mass and sunlight protection provisions are unjustified. The change of activity status for new buildings (to discretionary restricted) is unnecessary and undesirable. The section 32 report is also seriously deficient.	<ul style="list-style-type: none"> • 1) Amend 13.3 discretionary activities (restricted) so that any activities which do not comply with either 13.6.3.1.5 or 13.6.3.1.6 are discretionary activities (restricted) AND include rules so they must be processed without public notification under section 93 or service under section 94 RMA. 2) Amend 13.4 discretionary activities (unrestricted) so any activities which do not comply with 13.6.3.1.5 and 13.6.3.1.6 are not discretionary activities (unrestricted). 3) Amend all related provisions so they are consistent with these amendments sought. 4) Such further or incidental relief as may be appropriate. • 1) Delete 13.6.3.1.5 and all related provisions so the height limits for all buildings in heritage areas are as shown on Central Area Map 32 and exercise control on additions and alterations through the heritage provisions in Chapters 20 and 21. 2) Such further or incidental relief as may be appropriate. 	Y

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> 1) Delete 13.6.3.1.6 which contains minimum and maximum height controls for non heritage buildings in heritage areas so that the building heights shown on Central area Map 32 and the related provisions in the District Plan apply to the non heritage buildings. 2) Such further or incidental relief as may be appropriate. 1) Delete the Stout Street Heritage Area. 2) If the Stout Street Heritage Area is not deleted, reduce its extent by excluding the land and buildings with frontage to Stout Street between Balance Street and Lambton Quay. 3) Such further or incidental relief as may be appropriate. 1) Reject all of DPC48; 2) Such further or incidental relief as may be appropriate. 	
33	Marshall Day Acoustics Ltd Level 2 5-7 Willeston Street PO Box 25-442 Wellington	The submitter seeks some changes to the proposed new noise rules for outside speakers and fixed plant.	<ul style="list-style-type: none"> Deletion of paragraph 5 to the 'explanation' to Policy 12.2.2.4 commencing "Fixed plant noise within the Central Area" and deletion of Rule 13.6.1.1 (Fixed Plant). Reconsideration of the decision to delete Rule 13.1.1.1.2 and 13.1.1.1.3 from the Operative District Plan. Use of Leq acoustic parameter rather than L10 for rule 13.6.2.1.3. 	Y
32	Kendal Phillip Henry 6/17 Brougham Street Mt Victoria Wellington	The submitter considers that careful consideration needs to be given to the growth and urban form of central Wellington. The CBD and Fringe areas of the city are already congested and will need careful planning into the future if Wellington is going to take its place as one of the better cities of the world.	<ul style="list-style-type: none"> That the building heights are not increased as this is not necessary. 	N

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> • Adopt the proposed building mass requirement with the following amendments: - a minimum of open space/landscaping to be a ground level, say 10%; - where development occurs on a corner site, the clear air space at ground level should be allocated to the corner of the site with the intent to extend the pedestrian, socially active streetscape. Encouragement should be given to expanding open space with public amenities and water features wherever possible. Where two or more building sites are to be amalgamated their available open ground space should be amalgamated too. Minimum natural light to all habitable urban rooms should be requirement under the District Plan. • That landscaping should be part of all Resource Development Applications and that a landscaping design guide be developed by the WCC. • Landscaping and/or architectural enhancement of roof spaces should be encouraged. • That Wellington buses should have better noise and emission controls including breaking squeal. 	
31	Maurice Marks Goldsmith Apt 36 5 Eva Street Wellington 6011		<ul style="list-style-type: none"> • Add to Chapter 21.3 the following bullet point: 'where resource or building consent is sought for developments within 50 metres of a heritage building or item is sought, Council will notify the owners of the heritage building or item'. 	Y
			<ul style="list-style-type: none"> • Amend Chapter 21, Appendix 12: to include in the Cuba Street Area, the area from the corner of Cuba and Dixon Streets, south to Egmont Street, east to Ghuznee Street, then north to Cuba Street. • Include Hannah's Courtyard area as an Action Area, in list 6.0 of the Cuba Character Area Design Guide in the operative Plan. 	

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
30	Ulysses Trust PO Box 9014 Wellington Attn: Spyros Papageorgiou	Ulysses Trust's interests (45A-55 Courtenay Place, 45 Tory Street, 128-132 Courtenay Place, 104-106 Cuba Street, 168-174 Cuba Street) will be significantly and detrimentally affected by the proposed Courtenay Place and Cuba Heritage Areas and the sun access rules to 'Clock Park'.	<ul style="list-style-type: none"> Incorporate clear "assessment criteria" under Rule 13.3.4 and Rule 13.3.8, (a) any economic and other effects on building owners through the imposition of heritage and public amenity objectives; and (b) Council's policy on earthquake prone buildings. 	Y
			<ul style="list-style-type: none"> Delete Rule 13.6.3.1.5 and Rule 13.6.3.1.6 and retain the operative maximum height provisions (as per Planning Map 32) for the Courtenay and Cuba Character Areas. Remove 'Clock Park' from the list of Central Area public spaces subject to Rule 13.6.3.4 or, in the alternative, provide compensation for the loss of development potential for 128-132 Courtenay Place. Provide adequate financial compensation to owners of buildings within heritage areas which are directed toward public benefits and outcomes at the 'expense' of building owner's legitimate expectations. 	
29	Mark Ashby C/- Connell Wagner Ltd 102 Customhouse Quay PO Box 1591 Wellington	The District Plan is overly prescriptive and reliant on a single methodology for providing information about potential wind effects. Connell Wagner believes there may be other technically acceptable means of achieving the aims set out in 1.1 to 1.3 of Appendix 8.	Amend the wind provisions of the District Plan to place lesser emphasis on using wind tunnel testing to achieve the aims stated in Appendix 8, as a means of 'future proofing' the District Plan.	Y
28	Accor Asia Pacific Ltd C/- Connell Wagner Ltd 102 Customhouse Quay PO Box 1591 Wellington	Accor's submission is that inclusion within the Heritage Area of 24 Cambridge Tce, and the subsequent application of Rule 13.4.8 and Standard 13.6.3.1.6 is inappropriate and overly restrictive of Accor's future use of the site. Under Rule 13.4.8, once constructed to its consented height, any future alterations above the 18m level would require consent as a discretionary Activity (Unrestricted).	Exclude Lot 1 (being a subdivision of Lot 1 DP67814) from the Courtenay Place Heritage Area, as shown by Appendix 14, so that it is subject to the underlying Central Area height limit of 27 metres.	Y

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27	Mount Victoria Resident's Association PO Box 19056 Courtenay Place Wellington	We support the intent of this proposal that will ensure that there are controls in place that constrain developers in their activities and that height limits become absolute rather than baseline and open to interpretations, and that there is greater consistency in the rules. The submitters also note that there is a fine balance between promoting active edges and hindering the passage of pedestrians.	<ul style="list-style-type: none"> That consideration be given to regularising the boundaries of the Courtenay Place Heritage Area to remove its intrusion into Mount Victoria at the bottom of Marjoribanks Street and northwards along Roxburgh Street to Hood Street as this block is within Mount Victoria. 	N
			<ul style="list-style-type: none"> That view-shafts must be maintained from the Te Aro to Mount Victoria and that they should be ascertained from a street, human level rather than generously aligning the view from "above mean sea level" (amsl). That constraints be placed on developers and designers to ensure verandahs (5.3.7.4) are not allowed to protrude into view-shafts (5.3.7.2) and thus affect the passage of sunlight (5.3.7.2) to and from Mount Victoria. That definitions provided within any design guide to the District Plan should ensure that the width of the remaining 'non-café' public pedestrian way is sufficiently wide to accept the peak pedestrian flow and does not disaffect traffic and pedestrian safety. A reduction in the width of the "cafe" zone for current and future cafe owners may be necessary. That the language used in the Heritage Area design guides to control heritage activities must be direct and clear rather than suggestive and open to wide interpretation. 	
26	Dr Marko Kltakovic 9A Chatsworth Road Upper Hutt	The submitter is concerned about the implications of the proposed Cuba Street Heritage Area. At this stage the Council does not appear to have adequately addressed; 1) the financial implications of reducing building heights, 2) compensation for private owners should such restrictions be enforced, 3) rates relief issues with heritage/historic buildings, 4) an objective and professional opinion of the heritage value of specific buildings within the proposed heritage area.	<ul style="list-style-type: none"> Remove the Footscray Ave cottages located on 65-69 Abel Smith St, Te Aro from the proposed Cuba Street Heritage Area. 	Y

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> Delay any decision on creating the Cuba Street Heritage Area until the financial implications, compensation (rates relief) and further objective opinion on heritage values have been considered and agreed with private owners. 	
25	St Peter's Apartments Body Corporate 192 Willis Street Wellington Attn: Stan Crothers	This objection agrees with the proposal to create a park adjacent to McDonald Crescent and opposes the proposed changes that provide for commercial development to a height limit of 27 metres at the tunnel entrance and Ghuznee St intersection.	<ul style="list-style-type: none"> Recognition of the interests and rights of existing inner city residents other than those in properties to the west of the proposed development. 	Y
			<ul style="list-style-type: none"> Enhanced consideration to ensuring adequate protection of the historic value of St Peter's Church and recognition of the detrimental impact of buildings to the proposed 27 metres height restriction. Managed development of an open park space to link McDonald Crescent with Ghuznee Street. If commercial development is to be allowed, significant reduction in the proposed 27 metre height restriction to take property account of the existing amenity values of adjacent residents and the value of the historic St Peter's Church property. 	
24	Vanessa Robson 8 Prince Street Mt Victoria Wellington	The submitter seeks a number of changes to certain aspects of PC48.	<ul style="list-style-type: none"> I support the changes relating to building mass (12.2.5.2, 13.6.3.2). 	Y
			<ul style="list-style-type: none"> With respect to the discretionary height: delete 13.3.8.14 "maximum building height must not be exceeded by more than 35%, and the building mass standard must not be exceeded". 	

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> <li data-bbox="1211 261 1883 448">• Amend 13.4.9 to read: "the construction of and alteration of, and addition to buildings and structures which are Discretionary Activities (restricted) and do not meet the conditions specified in 13.3.9.15 are Discretionary Activities (unrestricted) subject to compliance with the following condition: 13.4.9.1 maximum building height must not be exceeded by more than 10%". <li data-bbox="1211 459 1883 555">• Wind - That the maximum gust speed for wind (13.6.3.5) be reduced further as the wind environment has been allowed to worsen to what is an unacceptable level. <li data-bbox="1211 566 1883 662">• That the ground floor frontages and display window provisions be adopted as proposed as they contribute to more interesting streets (13.6.3.7). <li data-bbox="1211 673 1883 794">• Site Coverage - Amend policy 12.2.7.3 to include these words: Most blocks are made up of 2 rows of sites backing onto each other. Keeping the space between buildings in the centre of blocks gives access for sun and light at the backs of buildings. <li data-bbox="1211 805 1883 901">• Amend standard 13.6.3.8 Site Coverage to read: 13.6.3.8.3 Building development in the Central Area must include a backyard of 2.5m. <li data-bbox="1211 912 1883 1034">• Regarding general Central Area building heights; reduce city's highest permitted height which is in the railway yards, from 50m to 27m. 50m would also have significant shading effects - compromising the future amenity of the waterfront in that area. <li data-bbox="1211 1045 1883 1193">• Reduce the 27m permitted height limit in the block between Lambton Harbour area and the Courtenay Place heritage area. When combined with the proposed lower height of the Courtenay Place Heritage area there would be considerable contribution towards a better harbour view from the CBD. <li data-bbox="1211 1204 1883 1326">• Amend principle 12.1.5's last sentence to read: The lower height on the waterfront and areas adjacent to it completes the stepping down from the hills to the waterfront and enhances the sharing of the view. 	

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			<ul style="list-style-type: none"> That the Central Area Design Guide includes a section on block permeability, including a map of suggested lanes and walkways through oversized blocks in Te Aro. 	
23	Hannah Playhouse Trust C/- Deloitte PO Box 1990 Wellington Attn: Chris Prowse	District Plan change 48 in particular the Courtenay Place Heritage Area provisions, with have a distinctly negative effect on the value of the Trust's principle asset, namely the Hannah Playhouse containing the Downstage Theatre.	Delete provisions (12.2.3.2, 13.6.3.1.5 and 13.6.3.1.6) in favour of the existing conditions (i.e. provisions of the current plan) in relation to the Courtenay Place Heritage Area.	Y
22	Ian Bowman 12A/4 Claremont Grove Wellington	The submitter generally supports the Plan Change and provisions within it including the creation of nine heritage areas as well as the addition of a new precinct to cover the port and rail land to the north of the city centre, enabling the listing an control of heritage buildings in that area.	<ul style="list-style-type: none"> That specific controls on signage be developed for listed heritage buildings. The assessment criteria should include what has been historically associated with the building, such as signage on theatres and cinemas. 	Y
			<ul style="list-style-type: none"> That views to and from each of the heritage buildings should also be controlled. Seeks that the existing criteria for assessment of heritage values is retained. That an additional heritage area around the Bypass heritage buildings should be added. That cumulative changes to buildings within heritage areas should be assessed. Regarding building heights on listed heritage items the submitter recommends that each building be looked on a case by case basis with a conservation plan to study if an extension is acceptable and if so to what extent and what design should be allowed. 	

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21	Trojan Properties Ltd Scoter Ventures Ltd Nalanda Properties Ltd & DN Govan Family Trust C/- Dayal Govan PO Box 11783 Wellington	The submitters own the following properties which are located in a proposed new heritage area. The heritage area is opposed as being overly restrictive and creates greater uncertainty: 160-166 Cuba St, 175-179 Cuba St, 230-234 Cuba St, 43-47 Ghuznee St, 66-68 Abel Smith St, 88 Manners St, 34 Webb St, 23 Vivian St, 36-40 Vivian St, 113 Tory St.	That the operative development allowances, including the maximum height (as per Planning Map 32) and building provisions for the above properties and Te Aro area are retained.	Y
20	Celia Walusky St James Theatre Charitable Trust 77-87 Courtenay Place PO Box 9132 Wellington	The site behind the St James Theatre is an asset held in trust for the future viability and development of the St James Theatre and the Opera House. This provision will affect future options and viability of the theatres.	That 100% utilisation allowance of the site (i.e. of building mass) be reinstated.	Y
19	Foodstuffs Co-operative Society Ltd PO Box 38896 Wellington	The submitter is concerned that when existing buildings that do not presently incorporate any display windows/active building edge frontages are adapted for new uses, flexibility must be exercised in the application of rule 13.6.3.7.	<ul style="list-style-type: none"> The inclusion of an assessment criterion under Rule 13.3.8 relating to the flexible implementation of the display window/active building edge standards when existing buildings that do not have display windows are being adapted for new uses. The reinstatement of assessment criteria for all discretionary activity (restricted) rules, as these provide certainty about matters to be considered. 	Y
18	Wellington City Council PO Box 2199 Wellington	Submission seeks largely minor, technical changes to four different issues: (1) Definitions of 'site area' (2) Vehicle parking, servicing and site access provisions (3) Incorrect cross reference in rule 13.4.9. (4) Sunlight protection to West Courtenay Area (Clock Park)	<ul style="list-style-type: none"> Delete the definition of Site Area contained in Chapter 3 of proposed plan change 48. Amend the definition of Site Area contained within rule 13.6.3.2.1 as follows: 'Site Area - means the total area of the site (or sites) that forms part of the development, but does not include any portion of the site subject to strata title. See also the definition of site'. 	N

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			<ul style="list-style-type: none"> Amend the vehicle clearance standard to be 4.6m to ensure the full range of vehicles (and loads) can access loading areas. That there be an exception to the maximum verandah height for loading areas to ensure sufficient clearance is able to be provided. That section 1 of ASNZ standard 2890.1 - 2004 Parking facilities also be included in PC48, alongside sections 2, 3 and 5. That rule 13.4.9 is amended to refer to stds 13.3.8.14 and 13.3.8.15 instead of 13.3.9.14 and 13.3.9.15 (which do not exist). That the proposed text in section 13.6.3.4 be amended to refer to 'West Courtenay' instead of Clock Park and that Appendix 7 be amended to include a revised 'protection area' of West Courtenay along with the revised area description. 	
17	James Robert Reid Cook 156 Rolla Street North East Valley Dunedin	I oppose the proposal to rezone the Ghuznee St intersection from Inner Residential to Central Area and a building height standard of 27m above ground level to apply.	Maintain the present zoning for the Ghuznee St intersection.	N
16	AMP NZ Property Commercial Ltd PO Box 5346 Auckland Attn:Brent Buchanan	The submitter owns a property within the proposed BNZ/head office Heritage area and is opposed to its inclusion in this area due to the excessively restrictive provisions resulting in significant effects on the development potential of the site.	<ul style="list-style-type: none"> That 187 Featherston Street be excluded from the BNZ/Head Office Heritage Precinct. 	Y
			<ul style="list-style-type: none"> Failing exclusion from the BNZ/Head Office Heritage Precinct, amend 13.6.3.1.6 by inserting the following provision under "BNZ Centre": "for the property at 187 Featherston Street, the maximum permitted building height shall be 80m". The submitter seeks a number of changes to objective 12.2.5 (Effects of new building works) and its associated policy 12.2.5.1 with the intent of enabling new buildings more within heritage areas (draft wording supplied). 	

Number	Submitter Details	Submission Summary	Decision(s) Requested	Wish to be heard
			<ul style="list-style-type: none"> Similarly, the submitter seeks a number of wording changes to the proposed rules for height within heritage areas (13.6.3.1.6 and 13.4.8). These changes include: 1. Amend 13.6.3.1.6 by deleting "on vacant land" and replace with "on sites occupied by non heritage buildings to be demolished". 2. Delete existing italicised explanation alongside 13.6.3.1.5 and 13.6.3.1.6 or replace with more appropriate wording. 3. Amend 13.6.3.1.6 by deleting the phrase "minimum and maximum height limits" and replace with "lower and upper threshold heights" and deleting the words "minimum height" and "maximum height" from the table heading and replace with "lower threshold " and "upper threshold". 4. Amend 13.6.3.1.6 by inserting the following phrase under "BNZ Centre": "For the property at 187 Featherston Street, the upper threshold building height shall be 40m and the maximum building height shall be 80m". 5. Delete rule 13.4.8 and replace with a Discretionary (Restricted) Rule (draft wording supplied). Amend the BNZ/Head office Heritage Area Design Guide (Appendix 3) by the inclusion of the following: - Insert the words "heritage listed" prior to the words "building" and "features" in objective 01.1; - Include an additional guideline as follows "Respect that owners of non-heritage buildings may either wish to retain, add to, or demolish and redevelop their sites with a new building, and that building height and mass above permitted activity "thresholds" will be assessed on a site specific basis". 	
15	Wellington Regional Stadium Trust PO Box 2080 Wellington Attn: David Gray	The Wellington Regional Stadium Trust generally supports the Plan Change, subject to some minor amendments, with the exception of the proposed Signs Standards, which it opposes.	<ul style="list-style-type: none"> Add a further "Method" to Policy 12.2.9.2 as follows: Thorndon Parking Management Plan; Pedestrian Management Plan. 	Y

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			<ul style="list-style-type: none"> Either retain the present provisions (rule 13.20.2.1) in full, including the explanation; or (in the alternative) amend the new provisions proposed by the Plan change (rule 13.6.4.1.6) to read as follows: For any sign located on the Wellington Regional Stadium building and site (Lot 1, DP 85907 and Lot 1, DP 10550) the following standards shall apply: The maximum area of any one sign attached to the stadium building be 40m2. There may be no more than eight signs attached to the stadium building. The sign must bear only the name and/or logo of the building owner/sponsor/customer or relate to stadium occupier(s) and/or stadium activities. Any signs located on the stadium building must be flush with the building surface, and not project out from the wall or above the roof of the stadium. There are no limitation on signs on the stadium roof. There is no limitation on signs within the inner perimeter of the stadium building. There is no limitation on the number and size of free standing signs permitted on the stadium site. Add to rule 13.6.2.10 (iii) the words "on any one day" so that the rule reads as follows: (iii) a total period not exceeding three hours on any one day. 	
14	Regional Public Health Hutt Valley District Health Board Private Bag 31-097 Lower Hutt Attn: Chris Edmonds	The submitter is keen to ensure that the public health risks associated with the proposed plan change are considered. In this situation there is change required to the Construction Noise Standard.	That the std referred to in 13.6.2.1 be replaced with a reference to NZS6803, 1999 Construction Noise, along with any other consequential changes for that standard.	Y
13	Wellington Civic Trust PO Box 10183 Wellington Attn: Di Buchan	While the Trust accordingly supports the Change in broad terms, we do have concerns over some matters which we believe have been overlooked and we query whether some of the proposals will be as effective as is hoped.	<ul style="list-style-type: none"> General: The Trust strongly endorses bringing the Port Redevelopment Precinct fully under the control of the Council. That special consideration be given to the cumulative visual impact on the view of the city from the harbour (i.e. the picture postcard view) and protection of the scenic value from the city to the water's edge. 	Y

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			<ul style="list-style-type: none"> <li data-bbox="1211 264 1890 323">• To protect options for the future expansion of port capacity that do not involve further harbour reclamations. <li data-bbox="1211 328 1890 544">• While no change is intended to this policy, the Trust would like to point out that from an engineering and earthquake safety point of view, the policy means that high rise buildings are concentrated on the least stable reclaimed land while the low rise buildings are concentrated on the geologically stable land to the north and south of the central area. This is a factor that deserves consideration in Council's future planning. <li data-bbox="1211 549 1890 608">• General: The Trust has for some time been concerned about this "gateway" entrance to the city (Pipitea Precinct). <li data-bbox="1211 612 1890 743">• That plans for the Pipitea Precinct should not compromise the functional viability of the rail link to the CBD. In other words rail land should not be reduced to the point where it precludes further growth in traffic through the rail corridor. <li data-bbox="1211 748 1890 1062">• The proposal to set a building mass limit of 75 percent in place of the current 100 percent is supported. While no one can be precise as to the ideal percentage to adopt, and arbitrary percentages have obvious weaknesses, the 100 percent standard has led to some unfortunate outcomes in terms of design and effects on neighbours. We seek that applicants for dispensation from the building mass std should be required to show the impact on neighbours, the surrounding area and the wider city particularly in terms of shade, wind, traffic and pedestrian safety and comfort. <li data-bbox="1211 1067 1890 1254">• Parliamentary Precinct Heritage Area: this seems to be far too tightly defined. We believe it should at least include such important national buildings as the Anglican Cathedral, the National Library, the Court of appeal and Turnbull House. They are all likely to be there for another 100 years and deserve recognition as "future heritage buildings". <li data-bbox="1211 1259 1890 1369">• Civic Centre Precinct: This precinct should also include the new City Library and the Council's new Administration Building as they both add a great deal to the pleasant environment of Civic Square. 	

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			<ul style="list-style-type: none"> At least 3 "pocket parks" protected from prevailing winds are needed on Lambton Quay or Featherston Street between Midland Park and the Civic Centre. The Trust strongly recommends that the Council should establish an independent Design Review Committee to which all significant developments should be referred prior to being considered by Council as a way to reduce reliance of decision making on individual council officers, and to ensure robust decisions. 	
12	Manchester Unity Friendly Society PO Box 5083 Wellington Attn: Peter Schumacher	PDPC 48 proposes to retain the current operative height limit for 26 Kent Tce 10.2m (2 storeys). This height limit is inconsistent with nearly all other sites along the eastern side of Kent Terrace which have a maximum height limit identified by District Plan Map 32 of 18.6m (4 storeys). This existing inconsistency is now to be continued by Proposed District Plan Change 48 which adversely affects the submitter's interest in maximising the utilisation of this valuable physical resource.	That the maximum permitted activity height limit (above ground) for 26 Kent Terrace be increased from the proposed 10.2m up to 18.6m.	Y
11	Ben Buckley 70/192 Willis Street Wellington	We oppose the idea of rezoning land in the immediate area of Ghuznee and Willis streets, particularly the 27m height limit. Should multi story buildings be constructed around us we would lose privacy, lose our view and sunlight which was a major decision in purchasing in the first place, and the plummeting value of the property would just destroy us.	The council should abort its current zoning proposal in the Ghuznee / Willis area and take into view the needs of existing residents in St Peters Apartments and the surrounding community, coming up with a less drastic and more suitable plan for the land, i.e. not more than 2 storeys.	N

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10	Dominion Funds Ltd Level 9 99 Customhouse Quay Wellington Attn: Andrew Hay	DFL opposes the inclusion of Optimation House (1-13 Grey St) in the proposed Post Office Square Heritage Area and opposes the excessively restrictive heritage area provisions. It opposes rule 13.6.3.1 restricting maximum building height for non-heritage buildings within the Post Office Square Heritage Area.	Remove Optimation house (1-13 Grey Street) from the proposed Post Office Square Heritage area; or failing the removal of Optimation House from the Post Office Square Heritage Area, amend rule 13.6.3.1.6 by inserting the following provision under "Post Office Square": - west of Jervois Quay 20 m (minimum height) / 80m (maximum height). Failing the removal of Optimation House from the Post Office Square Heritage Area, amend Policy 12.2.5.1 by: 9a) deleting the second bullet point and replacing with: "Achieve appropriate building height and mass within identified heritage and character areas". (b) Amend the explanatory statement to acknowledge that significant economic benefits / positive effects can and do accrue from Central Area buildings built in accordance with the 'high city' building heights presently included in the operative District Plan; and that a balance should be achieved, particularly where non-heritage buildings are concerned, between encouraging on-going economic sustainability and management of identified heritage resources. Failing the removal of Optimation house from the Post Office Square Heritage Area, providing for the construction of new buildings and structures, or the alteration of, and addition to existing non-heritage buildings in heritage areas as a Discretionary Activity (Restricted) and not as a Discretionary Activity (Unrestricted), as proposed by rule 13.4.8, in respect of building height and placement of building mass; and with the presumption of non-notification and service to apply.	N
9	Nicholas Morgan PO Box 802 Shortland Street Auckland	Objection to our property (62 Webb St) being included in heritage area of Cuba St as our property fronts only on to Webb St.	That the council review the heritage area boundary line drawn around our property at 62 Webb Street as it does not bare any relation to the heritage area of Upper Cuba Street.	Y
8	Wellington Distributors Ltd 45 Rugby Street Mt Cook Wellington Attn: Ben Sutherland	The submitter opposes the proposed height restriction change, in particular Cuba Street south of Abel Smith St (Heritage area 13.6.3.1.6).	The submitters preferred option is that the currently height restriction remain in place. A second option would be that upper Cuba Street (south of Abel Smith St) should have all the same height restrictions. A third option would be to include 250-264 Cuba Street in the area between Dixon and Able Smith Streets (maximum height of 18 metres).	Y

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7	Stratum Management Ltd 1 Willeston Street PO Box 11 680 Wellington	The submitter has concerns with the provisions relating to fixed plant noise, as they are unnecessarily restrictive, impracticable to comply with, and therefore unreasonable in the context of Central Area development.	<ul style="list-style-type: none"> Deletion of paragraph 5 to the 'explanation' to Policy 12.2.2.4 commencing "Fixed plant noise ... and ending ... within the Central Area". 	Y
			<ul style="list-style-type: none"> Deletion of Rule 13.6.1.1 (Fixed Plant). 	
6	Grand Complex Properties Ltd PO Box 10 343 Wellington Attn: Kevin Currin	The submitter is primarily concerned about the loss of development as a result of the proposed mass std (13.6.3.2) which adversely affects the submitter's interest in maximising the use of their property at 22-42 Willis St.	That rule 13.6.3.2 "Building mass" be deleted together with associated objectives and policies.	Y
5	S William Toomath 28 Robieson Street Roseneath wellington	I support the provisions of Proposed District Plan Change 48 in general; and I commend the Council's response to CentrePort's 'Harbour Quays' initiative. However, concern remain regarding possible future development of buildings to house non-port activities on the major part of the Operational Port Area remaining exempt from District Plan controls. An uncontrolled proliferation of non-core use buildings could result in an unsightly Seaview-type industrial site, centred on the inner harbour and highly visible from Wellington's CBD and its amphitheatre of hills.	<ul style="list-style-type: none"> That the Council further adopt a pro-active strategy with a view to introducing controls, similar to those of District Plan Change 48 and as relevant, over any building developments proposed for non-port activities on the Operational Port Area at present. 	N
			<ul style="list-style-type: none"> That the Council adopt District Plan Change 48 as proposed. 	
4	C Plimmer Estate Resource Property Management Ltd 1 Queens Wharf PO Box 1048 Wellington Attn: Michael Faherty	The submitter is concerned about the reduction of maximum developable height from 43m to 18m for their property.	Maintain the maximum allowable building height in the Cuba Heritage Area at 43m or at the very least to remain at 43m for the subject site in recognition of its corner location and potential as an important 'marker' at the northern end of Cuba Mall.	N
3	Clinton Riley CJ Holdings Ltd PO Box 24056 Wellington	I oppose the Sunlight Protection for Denton Park as it would restrict the size of future development - namely floor plate size of my building. As would building mass (13.6.3.2).	Do not change the current plan or reduce leasehold and rate payments.	Y

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2	Roger Walker PO Box 27464 19/20 Egmont Street Wellington	If redevelopment up to the proposed line behind 104 is considered appropriate to protect Cuba St, then this line continued parallel to Cuba St through the 94-102 building must offer the same level of protection to Cuba St. 94-102 Cuba St (Farmers Building) has a structural grid enabling sectional redevelopment. The proposed setback line compromises the future implementation of a proposed pedestrian avenue through the site.	Continue Heritage area boundary control line begins 104 Cuba Street through 94-102 Cuba Street, parallel to Cuba i.e. so that it cuts through the middle of buildings at 94-102 Cuba Street.	Y
1	Keith T Matthews 362 Tinakori Road Thorndon Wellington	Submitter is concerned with a variety of urban design issues, including views to important buildings, aesthetics of tall buildings, relationship of new buildings to existing buildings, and trees in the central area.	The addition of the following or similar wording: "that provision be made requiring better protection of cityscapes, preserving view shafts and lines of sight to significant buildings, especially those of historic significance. Each major project should include this item at the planning stage".	N