

# Wellington City Proposed District Plan - further submission form

Clause 8 of the First Schedule, Resource Management Act 1991.

## How to make a further submission

- email your submission to: **PDPsubmissions@wcc.govt.nz**
- post this form to us (no stamp needed)
- drop your completed form off to Wellington City Council reception, Level 16, 113 The Terrace.

To make sure your further submission can be considered, please lodge by **5pm Friday 2 December 2022**.

## Privacy statement - what we do with your personal information

All submissions (including name and contact details) are published and made available to elected members and to the public from our offices and on our website. Personal information will also be used for the administration of the notified Proposed Plan process.

All information collected will be held by Wellington City Council. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at **district.plan@wcc.govt.nz**.

## Certain persons may make further submissions

Under clause 8, Schedule 1 of the RMA the following persons may make a further submission, in the prescribed form, on a proposed plan to the relevant local authority:

- any person representing a relevant aspect of the public interest
- any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has
- the local authority itself.

You will need to explain why you meet one of these categories (space is provided in the form for this below).

## Reasons why a further submission may be struck out

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least one of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Note to person making the submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority (Wellington City Council).

## Your details

Name	
Postal address <i>(including suburb)</i>	
Phone/mobile	Email
I am making this submission: <input type="checkbox"/> as an individual <input type="checkbox"/> on behalf of an organisation. Organisation's name:	
I would like to be heard in support of my further submission <input type="checkbox"/> Yes <input type="checkbox"/> No	
If others make a similar submission, I will consider presenting a joint case with them at a hearing. <input type="checkbox"/> Yes <input type="checkbox"/> No	

## This is a further submission on the Wellington City Proposed District Plan

State whether you are *(select appropriate box)*

<input type="checkbox"/> A person representing a relevant aspect of the public interest. <i>In this case, also please specify the grounds for saying that you come within this category</i>
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A person who has an interest in the proposal that is greater than the interest the general public has.  
*In this case, also please explain the grounds for saying that you come within this category.*

The local authority for the relevant area.  
*In this case, also please specify the grounds for saying that you come within this category.*

*Multiple provisions can be commented on within the following section. Feel free to add more pages to your further submission to provide a fuller response.*

<b>I support/oppose the submission of:</b> <i>(State the submission number, name and address of the person making the original submission)</i>	<b>The particular part/s of the submission I support/oppose are:</b> <i>(State the submission number/point number of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			<b>The reasons for my support/opposition are:</b> <i>(State the nature of your submission, giving reasons)</i>	<b>I seek that the whole (or part) of the submission be allowed/disallowed:</b> <i>(Give precise details of the decision you want the Council to make)</i>
	Sub no./ point no.	Support/ oppose	Provision		
	Sub no./ point no.	Support/ oppose	Provision		

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Free Post Authority Number 2199

**Absolutely Positively  
Wellington City Council**

Me Heke Ki Pōneke

Reply



FREEPOST 2199

District Plan Team (121)

PO Box 2199

Wellington 6140

## Generation Zero Inc – WCC PDP – Further submission table

I support/oppose the submission of:	The particular part/s of the submission I support/oppose are:	The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
<b><i>Support – Enabling more density and mixed-used development</i></b>			
<p><b>Matthew Tamati Reweti</b> matthew.reweti@gmail.com</p>	<p>394.11  394.11</p> <p>Support</p> <p>Residential zones, Commercial and mixed-use zones</p>	<p>394.11 - Support and further submit that:</p> <ul style="list-style-type: none"> <li>• The Coalition for More Homes setback, recession planes and outdoor space recommendations should be adopted.</li> <li>• These recommendations enable perimeter block housing rather than only enabling 'sausage flat' housing, due to New Zealand's typical long, narrow sites.</li> <li>• This leads to better urban design outcomes that maximise quality habitable indoor and outdoor space for residents, minimise shading and privacy impacts for neighbours, and produces housing that positively interacts with the street frontage.</li> </ul> <p>394.12 - Support and further submit that:</p> <ul style="list-style-type: none"> <li>• More mixed-use zoning should be adopted in all residential zones, especially in MDZ and HDZ.</li> <li>• The PDP focuses on enabling more residential development but lacks enabling commercial development outside the CCZ. Low impact uses like daycares, cafes, physios, doctor's offices, small retail should be enabled. This can especially be enabled on corner sites and near existing town centres and villages, and in walkable catchments.</li> <li>• Mixed-use zoning is essential for well-functioning urban environments. It has numerous benefits including: increased ability for new shops to cater for new residents and WFH habits, lower transport needs, more freedom for children and elderly, more competitive commercial rents, vibrant community villages, spillover safety benefits. Pre-1930s suburbs have significant 'grandfathered' mixed use zoning, before modern zoning was introduced. These provide significant local amenity to residents, reflected in the high prices and increased liveability of those suburbs.</li> <li>• Low impact commercial uses have little negative externalities (these can be managed via existing PDP noise, shading, opening hour, etc provisions) and significant positive externalities.</li> <li>• More mixed-used zoning is consistent with Objectives 1, 3, 4 and 8 of the NPS-UD. And policies 1, 2.</li> <li>• Council is rightly planning for growth by enabling residential housing supply, it must also enable neighborhood mixed-used zoning to cater for that growth.</li> </ul>	<p>Allow the submission.</p> <p>Adopt the Coalition for More Homes setback, recession planes and outdoor space recommendations in the MDZ and HDZ zones.</p> <p>Adopt more mixed-use zoning in all zones, especially the MDZ and HDZ zones.</p>

<p><b>Jonathan Markwick</b> jmar3120@gmail.com Flat 4B 1 Hanson Street, Mount Cook, Wellington 6021</p>	490	Support	Residential zones	<p>490.5 - Support and submit:</p> <ul style="list-style-type: none"> <li>• Enable 6 stories in more of Kelburn. Kelburn is the site of a major regional employment hub and currently has very low development capacity and correspondingly higher rents, house prices and lower rental quality than the rest of the city.</li> </ul> <p>490.6 - Support and submit:</p> <ul style="list-style-type: none"> <li>• Enable 6 stories in Grass and Hay St, Oriental Parade as within the walkable catchment of the City Centre.</li> </ul>	<p>Allow the submission.</p> <p>Adopt 6 Story zoning across more of Kelburn.</p> <p>Adopt 6 story zoning in Grass and Hay St, Oriental Parade.</p>
<p><b>Kāinga Ora Homes and Communities</b>  Gurv Singh gurv.singh@kaingaora.govt.nz PO BOX 2628, Wellington 6140</p>	391	Support	All PDP	<p>391.41 - Support extending walkable catchments.</p> <p>391.42 - Support extending height limits within walkable catchments</p> <p>391.101 - Support proposed amendment to THW-04 to note that “increase public investment where needed rather than to constrain otherwise appropriate development” and further submit that:</p> <ul style="list-style-type: none"> <li>• Poor infrastructure should not constrain development</li> <li>• Rather, it should be a signal for increased public investment</li> <li>• With appropriate cost recovery from new and existing users, infrastructure renewal and increasing of capacity should be cost neutral to water providers</li> <li>• Historic underinvestment in infrastructure to keep rates artificially low should not be a reason to stop new development</li> <li>• More residential development can spread the high fixed cost of public infrastructure thus making its average cost more affordable for all.</li> </ul>	<p>Allow submission.</p> <p>Extend walkable catchments.</p> <p>Extend height limits in walkable catchments.</p> <p>Amend THW-04 to note that “increase public investment where needed rather than to constrain otherwise appropriate development”</p>
<p><b><i>Support – Increased accessibility</i></b></p>					
<p><b>Disabled Persons Assembly New Zealand Incorporated</b>  Chris Ford chris.ford@dpa.org.nz PO Box 27-524, Marion Square, Wellington 6141</p>	343	Support	All of PDP	<p>Support. Generation Zero supports the council encouraging more accessible housing. Disabled people have little choice in the current housing market and more accessible housing is desperately needed.</p>	<p>Allow and adopt the submission in full.</p>
<p><b><i>Support – Increased partnership with mana whenua</i></b></p>					
<p><b>Te Rūnanga o Toa Rangatira</b>  Onur Oktem onur.oktem@ngatitoea.iwi.nz Te Rūnanga o Toa Rangatira, Level 2, 1 Cobham Court, Porirua 5022</p>	488	Support	All of PDP	<p>Support. Generation Zero strongly supports more mana whenua partnership in the development of the city.</p>	<p>Allow and adopt the submission in full.</p>
<p><b><i>Oppose – increasing character areas</i></b></p>					

<p><b>Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir</b></p> <p>cla.nols@outlook.com jamesfraser.avantgardener@gmail.com margaret.franken@gmail.com</p>	275			<p>Oppose and further submit that:</p> <ul style="list-style-type: none"> <li>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD.</li> <li>There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD.</li> <li>Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon.</li> <li>Character areas are in inner-city suburbs which are highly connected to jobs, shops, schools, community amenities and already have high-mode share of low emissions transport. The land is often the most resilient land in the city (being developed by colonists first). More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb.</li> <li>The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions.</li> <li>Therefore, the development capacity (and its associated positive outcomes) lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified.</li> <li>It must also be a site-specific analysis; the current broad-brush suburb-by-suburb analysis in the current District Plan is not allowed.</li> <li>The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected.</li> <li>Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3).</li> <li>Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test.</li> <li>Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3).</li> <li>The approach in the PDP, where only contiguous and</li> </ul>	
<p><b>Aro Valley Community Council</b></p> <p>Jaqui Tutt jaquitutt@gmail.com 25 Epuni Street, Aro Valley, Wellington 6021</p>	87.4-87.44				
<p><b>LIVE WELLington</b></p> <p>Jane O'Loughlin jane.oloughlin@gmail.com 12 Albany Avenue, Mt Victoria 6011</p>	154				
<p><b>Heritage New Zealand Pouhere Taonga</b></p> <p>Dean Raymond draymond@heritage.org.nz Heritage New Zealand Pouhere Taonga Takiwā o Te Pūtahi a Māui PO Box 2629, Wellington 6140</p>	70	Oppose	Residential zones, character areas		<p>Disallow all submissions in full to the extent they relate to character areas or reducing the enabled amount of housing.</p> <p>Reject increasing the character areas in the PDP.</p>
<p><b>Historic Places Wellington</b></p> <p>Felicity Wong Wgtn@historicplacesaotearoa.org.nz 21 Hay Street, Oriental Bay, Wellington</p>	182				
<p><b>Mount Victoria Historical Society</b></p> <p>Joanna Newman Jonewman@xtra.co.nz 20 Porritt Avenue, Mt Victoria, Wellington 6011</p>	214				
<p><b>Mt Cook Mobilised</b></p> <p>Carol Comber mtcookmobilised@gmail.com PO Box 9724, Wellington 6141</p>	331				
<p><b>Mt Victoria Residents' Association</b></p> <p>Angela Rothwell mtvicra@gmail.com</p>	342				

<b>Newtown Residents' Association</b> Rhona Carson newtownwellington@gmail.com	440			coherent pockets of high-quality character are proposed, is legal under the NPS-UD.	
<b>Roland Sapsford</b> roland@actrix.gen.nz 23 Epuni Street, Aro Valley, Wellington 6021	305				
<b>Wellington's Character Charitable Trust</b> Felicity Wong Duncan Ballinger (Stout Street Chambers) felicity_wong@icloud.com 21 Hay Street, Thorndon	233				
<b>Wellington Heritage Professionals</b> Amanda Mulligan amanda_mulligan@yahoo.com.au 7 Waitoa Road, Hataitai, Wellington 6021	412				

***Oppose – Johnsonville train line not designated as Mass Rapid Transit***

Johnsonville Community Association Darren Bottin jcainc2@gmail.com	429			Oppose and further submit that: <ul style="list-style-type: none"> <li>The Johnsonville Line meets the definition of “mass rapid transit” (MRT) in the NPS-UD. The elements of the definition should be viewed wholistically and not each as a bar to cross.</li> <li>The NPS-UD is not a transport document but a land-use document. The MRT definition is for enabling more housing where good infrastructure exists or is planned, and new housing is easily absorbed. While external transport planning documents are relevant, they are not determinative.</li> <li>The MRT definition should be future looking – to the frequencies likely when new residents are present, and when other changes are made (eg. Wellington Station crossover improvements, integrated ticketing, golden mile improvements).</li> <li>The existence of bus routes that are may be faster to the Central City at certain times of day actually supports the Johnsonville line being MRT. It indicates a transit-rich area that is a well-functioning urban environment capable of supporting more housing.</li> </ul>	Reject the submissions.  Designate the Johnsonville Train Line as “mass rapid transit” (and its associated train stations).
Onslow Residents Community Association Lawrence Collingbourne onslowcommunityassn@gmail.com 54 Waru Street, Khandallah, Wellington	283.5-283.6	Oppose	Residential zones		