

SUMMARY OF CONSULTATION ON THE DRAFT WELLINGTON URBAN GROWTH PLAN

November 2014, City Planning and Design



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WELLINGTON CITY COUNCIL **Wellington**



SUMMARY OF CONSULTATION

Draft Wellington Urban Growth Plan

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1. Introduction

The draft Wellington Urban Growth Plan was available for public consultation between 16 September and 13 October 2014. The consultation was unofficially extended until 17 October to accommodate a small number of submitters who needed more time to respond.

The consultation material, including the Draft Wellington Urban Growth Plan, the Summary and text-only accessible versions of both documents were made available on the Council website. Paper copies of the Plan and Summary were sent to all of the Council's libraries and contact centres, and copies were also mailed out on request.

The Council publicised the consultation through its e-mail notification system, its information webpage, by placing advertisements in the Dominion Post and The Wellingtonian, and by issuing a press release.

Organisations, such as the New Zealand Transport Agency and Greater Wellington Regional Council, were e-mailed copies of the Plan and Summary and invited to provide feedback.

The consultation process also included a number of presentations / meetings with organisations, namely: Tawa Community Board, Council's advisory groups, Iwi, Regional Mayoral Forum, Housing New Zealand Corporation, Ministry of Education, NZ Transport Agency, CentrePort, Wellington Airport, Chamber of Commerce, Property Council, Inner City Retailers, Wellington Property Investors' Association and key developers.

Officers met with representatives of the Tawa Community Board and Churton Park Residents' Association to discuss their submission.

The Council received a total of **89 submissions**, with the breakdown listed below:

Organisation submissions	25 (includes 2 Tawa related submissions)
Tawa-related submissions by individuals	51
Other submissions by individuals	13

The major organisations that submitted are: New Zealand Transport Agency, Housing New Zealand Corporation, Greater Wellington Regional Council, Property Council New Zealand, Victoria University of Wellington, and Wellington Electricity Lines Limited.

Special interest groups that submitted are: New Zealand Centre for Sustainable Cities, Generation Zero, Environmental Reference Group, Wellington City Youth Council, Living Streets Aotearoa, Great Harbour Way Trust, Wellington Civic Trust, and Architectural Centre.

The residents associations and groups that submitted are: Tawa Community Board, Friends of the Tawa Bush Reserves, Churton Park Community Association, Johnsonville Community Association, Mt Victoria Residents' Association, Mt Cook Mobilised and Newtown Residents' Association.

Four private organisations made submissions. These are: Progressive Enterprises Limited (PEL) which owns Countdown supermarkets, Best Farm Ltd and Hunter Hill Ltd as a joint submission from the landowners of Lincolnshire Farm and Stebbings Valley area, Solari Architects, and The Wellington Company.

Submissions from individuals have been grouped for the purpose of this summary. The submissions from Tawa residents are summarised separately.

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2. General themes of submissions

The feedback received on the draft Wellington Urban Growth Plan is predominately positive.

Actions to increase housing numbers, facilitating more affordable housing options and maintain Wellington's environmental quality are strongly supported.

Transport is an important topic for respondents. Many support improving pedestrian and cycle facilities and safety; public transport improvements; and reviewing our parking policy. The Plan received mixed responses to large roading projects including the Petone to Grenada Link Road and the Roads of National Significance projects.

Other important issues for respondents are urban intensification and greenfield development, for which both supporting and opposing submissions were received. However, most submissions that commented on these issues are supportive of growth in regeneration areas such as Victoria Street and Adelaide Road. There is strong support for additional central city greening, urban parks, and pocket parks.

There is general support for the continued improvement of our centres, although some have highlighted a lack of perceived quality in both Johnsonville and Kilbirnie. There was support for continued growth around centres and along the growth spine, and some submissions identified that medium density housing should be allowed everywhere in our Outer Residential zoning. There was solid support for actions that would increase housing quality, such as the rental Warrant of Fitness.

Submissions are generally supportive of increased environmental protection and more eco-friendly development. This is seen as an important tenet of *Towards 2040: Smart Capital* which should be reinforced in the Growth Plan. Improving resilience throughout the city is also well supported, with a particular focus on earthquake strengthening and planning for sea-level rise.

Some commented that the Plan lacks detail in some areas and offers no implementation strategy or success indicators. A number of submissions questioned whether the Council could deliver the outcomes identified in the Plan and whether it was able to work collaboratively with other parties such as Greater Wellington Regional Council or the New Zealand Transport Agency. There were also doubts expressed over the ability of the Council to deliver good public transport outcomes, and whether any of the Roads of National Significance projects would 'help' the city.

Some submitters oppose greenfield growth, mainly due to environmental concerns or the perception that it is at odds with being a compact city. Other submitters oppose urban intensification due to concerns with the suitability of the potential intensification areas identified (these are around Tawa, Karori, Miramar, Newlands, Crofton Downs, Berhampore, Island Bay and Khandallah centres) or perceptions that urban intensification leads to higher house prices.

The transport actions in the Plan were criticised by some submitters for not aligning with the stated transport system hierarchy (pedestrians, cyclists, public transport, moving freight and then private vehicles). Some submitters argue that major roading projects go against environmental objectives or will not deliver the stated benefits.

Some submissions oppose the Council supporting and contributing financially to 'private' projects such as a new convention centre or an airport runway extension.

3. Submissions Summary

3.1 Organisation Submissions

New Zealand Transport Agency (NZTA)

The NZTA is supportive of the draft Plan. More specifically, it is supportive of:

- intensification along the growth spine, subject to this being better defined in the Plan.
- suburban centre improvements and residential intensification, subject to this being supported by public transport and other services.
- expansion of medium density housing.
- the proposed targets for low, medium and high density housing throughout the city as these reflect the investments being made in different transport modes.
- strengthening of key buildings along transport routes.
- reviews of road space allocation and city-wide parking.

The NZTA submission suggests amendments relating to major transport projects, as follows:

- better recognise the benefits of the Roads of National Significance projects, including the benefits for pedestrians and cyclists.
- strengthen Wellington City Council's investment in the growth spine, to accompany NZTA's investment in the bus rapid transit.
- commit to closer working relationship with the NZTA as the Council develops implementation plans, to align with the Regional Land Transport Plan.

Their submission highlights that it is a key investor in the Wellington transport network, including partial payment (50-60%) of the public transport network and the local road maintenance, and the full state highways budget. The agency therefore sees its investment as a key contributor to many of the Plan's actions as well as the success of the Plan.

Other comments made by NZTA on the draft Plan include:

- Better recognition of Wellington as the employment and business centre of the region. This means a more regional transport approach, including recognising that walking and cycling are not generally available forms of travel to work for people outside of the city (or in the outer parts of the City), as well as an improved recognition of the need for improved port access and freight movements.
- The Plan would benefit from listing implementation stages of bus priority and bus rapid transit networks and that all decisions around bus vehicles will be a joint decision by NZTA, GWRC and Wellington City Council.
- The benefits of the Roads of National Significance projects need to be more visible in the Plan. This includes increased resilience, being well-placed to face the transport challenges over the next 50 years, and the local, regional and national benefits, particularly in moving freight.
- The Plan should be aligned with the National Coastal Policy Statement and the Draft Regional Plan in relation to tests for development and activities in coastal environments.

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- Suggest better recognition of the link between quality transport and economic performance.
- The Council's 8 Big Ideas should be reflected more strongly in the Plan, especially Idea 6: Better Transport.
- The Roads of National Significance programme is a facilitator of Adelaide Road, Kilbirnie and Miramar growth.
- NZTA has reservations about the 'eco-town' proposal at Lincolnshire Farm. Wellington City Council should consult further on how the Petone to Grenade Link Road could be integrated. NZTA supports the development at Lincolnshire Farm being served by facilities such as mixed use development, community facilities and public transport.
- The agency supports the transport hierarchy in the Plan but questions how it is intended to be implemented in congested areas and incorporated in Network Operating Plans.
- NZTA encourages Wellington City Council to investigate defects in the pedestrian network, to improve safety.
- The Plan needs to recognise that planning for the road network has been completed and most projects are now at the implementation stage.

Housing New Zealand (HNZ)

HNZ generally supports the content of the Plan. Its submission also highlights a number of concerns. These are:

- The Plan has insufficient detail, and therefore certainty of outcome or process, in relation to the actions for encouraging housing development.
- There is scope to encourage medium and high density housing beyond what is proposed in the Plan.
- Special Housing Areas (SHAs) are a short term process for increasing housing supply. Other tools will be needed when the SHAs expire. HNZ supports changes to the planning framework to increase housing supply.

Greater Wellington Regional Council (GWRC)

GWRC supports the overall policy direction proposed in the Growth Plan. More specifically, it supports:

- the growth spine as a development strategy.
- transport choices that are supportive of development.
- increased resilience of the city.
- improved environmental outcomes.
- the reduction of development impacts
- improving the central city and our suburban centres.
- the review of design guides.
- high quality infrastructure that supports the city.

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- area specific developments such as Victoria Street, Kent and Cambridge terraces, Taranaki Street, Adelaide Road, Stebbings Valley and the Port Precinct.
- the transport hierarchy.
- greater recreational cycling opportunities.
- improved pedestrian accessibility and safety.
- the improved provision, reliability and affordability of public transport.
- an improved road network.
- car share schemes.
- a review of the Parking Policy.

GWRC welcomes the opportunity to work with Wellington City Council on planning for greenfield and infill development.

GWRC also suggests the following:

- GWRC aims to provide an increasingly energy efficient and low emission bus fleet but this will depend upon the technology available over time.
- GWRC supports historic heritage protection but questions how this will be implemented.
- GWRC supports the transport hierarchy, but highlights the need for a balanced and optimised network that will prioritise different modes, at different times on different routes.
- There needs to be greater inclusion of cycle facilities in key centres.

Property Council New Zealand (PCNZ)

PCNZ notes that the Plan is high level and supports its aims. However it warns against Council becoming 'overly prescriptive', which could disincentivise growth and investment.

More specifically, PCNZ supports:

- an increase in housing provision that is coupled with increased services, facilities, infrastructure and green or open spaces.
- the strengthening of earthquake-prone buildings when feasible. PCNZ suggests that the risk profile of the building and the economics of strengthening should be given significant weight in assessing a building for continued heritage protection. If strengthening is not viable but it is in the community's interest, then the community should be prepared to make a financial contribution. Without this, it is difficult to argue that the community truly values the building.

Further comments on the Plan:

- For the Wellington Region Roads of National Significance projects to have a significant impact, the Ngauranga Gorge bottleneck must be resolved. Ngauranga to Aotea Quay improvements and the Petone to Grenada link roads are key to this, and are therefore supported.
- The Petone to Grenada link road would act as an alternative to State Highway 2 and could increase the resilience of the region.

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- A focus on pedestrians, cyclists and public transport commuters is good, especially given the city's high rate of public transport use. It is however important to recognise that the private vehicle will remain the mode of choice for most trips. Therefore a balanced approach is recommended.
- To promote growth, developers need certainty and economic feasibility. Part of this could be through the use of incentives. PCNZ supports the approach taken by the Hutt City Council.

Victoria University of Wellington (VUW)

VUW's submission states that over the next 20 years, the university is aiming for an increase of 20,000 students, which is backed by expansions in both the Kelburn and Pipitea campuses. The university sees walking, cycling and public transport investment as key for current and future students and suggests that Wellington City Council work closely with GWRC for the best outcomes.

It also highlights that an increased commitment to biodiversity and sustainable buildings is important for the future of Wellington.

Wellington Electricity Lines Limited (WELL)

WELL supports the Plan and notes that it reflects its own Asset Management Plan. WELL's submission outlines opportunities to increase the profile of WELL and other infrastructure providers in the Plan. WELL suggests a definition of infrastructure is provided in the Plan in order to recognise the role and importance of WELL and other utilities providers. WELL considers that the Plan should reiterate the developers funding obligations more actively throughout the document.

New Zealand Centre for Sustainable Cities

The Centre supports intensification as a means of accommodating growth, while furthering the city's transport and environmental goals. In support of this, it presents research which discusses housing preferences of Wellingtonians, with 43% preferring high density, 36% low to medium density and 22% low density.

The Centre comments that the provision of affordable and healthy homes should cover all types of housing, not just medium density. To this end, actions such as a rental Warrant of Fitness are supported.

Additional comments include:

- Support for the transport hierarchy, but is unsure how Council will implement it.
- Support for a balanced car parking approach throughout the city.
- Quality green spaces or urban parks should accompany housing intensification. The Brisbane 'Green and Open Space Planning for Urban Consolidation' manual is referenced as an appropriate guide.
- There is a missed opportunity in incorporating Maori research and knowledge of the connection between people and the environment, to the urban form.
- A connection is lacking between the Plan and important environmental impacts. The Climate Change Action Plan should be referenced in the Plan.

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- The Centre, while supporting new transport options, advises against singling out one supplier, such as Uber, as it can reduce innovation and competition.
- More monitoring and implementation tools need to be identified in the Plan.

Generation Zero Wellington (GZW)

GZW's submission is supportive of the majority of the Plan's content. They note that urban development, land use and transport are strongly interdependent and it is therefore good to combine the Council's current strategies. Suggestions for improvement include:

- including of performance measures and a monitoring framework;
- providing a definition of the housing density types;
- stronger justification for greenfield development is needed otherwise the Plan should be amended to aim for further higher density living;
- the transport hierarchy is supported but the Roads of National Significance projects are at odds with it;
- more ambitious objectives on parking and road space allocation, and as such, a stated intent to reduce parking should be provided; and
- the car share scheme is supported and GZW asks for a review of any existing barriers.

Environmental Reference Group (ERG)

The feedback from ERG is focused 'largely on omissions within the document' as well as a stated concern that the proposals are inconsistent with character and environmental quality aims. Their comments are:

- The population projections represent rapid growth and the Plan does not state if it is accommodating or constraining this growth.
- The city's economic growth objectives may not be achievable by 'maintaining Wellington as a quality destination'.
- The development potential of 'low grade land', including rail yards, port facilities, vacant lots such as car parks and earthquake-prone buildings should be considered. Council could compulsory purchase such sites to deliver intensification.
- The Plan needs to provide more detail on how private vehicle trips entering our centres can be reduced.
- There is an assumption that development incentives are required, but the Plan provides no justification for or alternatives to this.
- The Plan lacks detail on the Council's response to sea level rise.
- As the population increases, so will pedestrian congestion, leading to social problems such as 'the pedestrian equivalent of road rage'.
- There is an opportunity for the Plan to better respond to the issue of an aging population.
- The Plan lacks detail about the current state of the infrastructure, in particular water, sewerage and surface drainage in growth areas.

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- Kilbirnie and other low-lying parts of the city are noted as hazard-prone. The Plan could outline resilience and infrastructure responses in these areas.
- The Plan could identify new parks and reserves throughout the city. It also suggests that all medium density areas include significant green space and pocket parks, as well as greater protection of existing spaces.
- The port area improvements should be rail focused, while supporting an out of city inland port.
- Centres should support people to work closer to their homes thus requiring less commuting into the central city.
- The transport hierarchy is supported but ERG would like more detail on the modal share proposed.
- ERG supports public transport priority measures.
- Parking in the central city should be configured to allow those needing short term parking for commercial uses priority access. More 'park and ride' at key transport nodes is supported.
- There is no mention of planned upgrades between Ngauranga George and Petone, including highway, rail, cycling and walking improvements coupled with increased storm protection.
- Homelessness is an issue that should be addressed in the WUGP and specifically in the discussion of affordable and social housing.
- Green growth and green economy initiatives are supported.
- The Plan does not consider resilience issues such as food security, financial stability, community support, sea level rise, economic diversification and water supply.
- Climate change options and actions are not adequately dealt with in the Plan.

Wellington City Youth Council

The Youth Council supports:

- The Council's identified growth areas. The Victoria Street proposal is seen as an exemplar of the type of development that could be carried out in other areas such as Adelaide Road.
- Cheap, reliable and fast public transport which is important for growth.
- The continued development and use of the city's laneways which will support Wellington's culture.
- The sensitive development of the waterfront.
- A pedestrian focused city centre.
- Choice in transport modes.
- A resilient city.

Two aspects that could be improved are:

- A recognition that young people continue to need affordable and accessible housing options.
- Retaining the character of the city's suburbs by encouraging apartment living to only be provided in the city centre.

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Living Streets Aotearoa

Living Streets Aotearoa supports:

- Improvements for key centres
- The transport hierarchy
- Increasing cycling and walking facilities
- Providing electric buses
- Parking and road space allocation reviews which are considered important to ensure better access throughout the CBD.

Living Streets suggests the following improvements to the Plan:

- A more consistent use of the roading hierarchy throughout the document.
- There are several pedestrian improvements options that are available to the city, such as, traffic light phasing, a dedicated pedestrian network with priority through the CBD and centres, more vehicle-free spaces, organised pedestrian groups, the closing of Lambton Quay to private vehicles, improved signage and improved bus shelters.
- Living Streets is generally opposed to greenfield growth as it is not a compact form of development.

Great Harbour Way Trust

The Trust is focused on delivering the Great Harbour Way around the Wellington harbour and supports this action. Specifically it notes that the Council will need to work with NZTA to deliver this path. The Trust would like:

- Separated cycle and walking routes where possible, but recognises that the waterfront should remain a shared space.
- Vehicle speeds around Miramar peninsula should be lowered to encourage more walking and cycling, and suggests that part of Massey Road is closed on Sundays to further support an active lifestyle.
- Footpaths on the south coast being widened to allow for shared use.

Wellington Civic Trust

The Civic Trust supports the Wellington Urban Growth Plan. The Civic Trust states that *Towards 2040: Smart Capital* is an important strategy and should be actively progressed. The Civic Trust considers that the Plan understates the collective work that the Council will have to do, in partnership with GWRC, NZTA and others. The Civic Trust considers that the Plan should state that high standards of architecture, urban design and landscaping are critical to its success.

The Architectural Centre Inc (AC)

Overall the Architectural Centre supports the Plan. Key aspects endorsed are:

- growth to services, public transport and employment

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- Wellington as a compact city
- a connection between Parliament and the harbour
- the improvement of the natural blue environment
- a rental warrant of fitness
- green construction, infrastructure and sustainable design
- the existing social housing work of the Council
- the continuation of the laneways programme
- the planned cycling improvements
- increasing housing density as it will be beneficial to the city
- housing demonstration projects by the Council – these are appropriate in growth areas such as Adelaide Road, Johnsonville and Kilbirnie.

AC's submission does not support:

- greenfield or low density development (single detached dwellings) and considers that existing urban areas have sufficient capacity for development. Any greenfield development could be required to be net-zero energy as a way of partially offsetting the impacts of such expansion.
- road improvements for private vehicles.

Other AC comments include:

- The city should be aiming for a higher population increase over the 30 years.
- Greater Council action is required for combining land parcels for redevelopment.
- A strategy for older people needs to be developed by the Council.
- More information is sought for the current population densities and projections, especially along the growth spine.
- AC recommends that views of the town belt need to be identified and protected.
- AC recommends that viewshafts in the city be reviewed before any significant development takes place, especially in Te Aro, along Kent and Cambridge Terrace, and between Parliament and the harbour.
- A city shared space network should be established for pedestrians and cyclists that includes new non-green spaces.
- The Council has a role to play in a number of housing issues. These are homelessness; tenancy law; and decentralised power including sustainable generation.
- The Council should have higher social housing targets. This includes looking at overseas models where 15-30% of new developments must be social housing.
- Encouragement for the Council to be a leader in the built environment.
- There should be greater staffing for heritage positions within the Council, as there are many sites throughout the city that are not recognised or protected.

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- Better definition of what the Council plans to do in relation to Tiriti o Waitangi is required. Also there should be improved engagement with Maori heritage and culture, such as targeting local Maori knowledge.
- A review of our street names should be conducted to better incorporate the heritage of the city.
- There should be: no car parking on arterial roads; integrated ticketing between public transport modes; improved route legibility; cycleways constructed from the CBD outwards; dropped kerbs to maximise the potential for cyclists; painted roads to separate and make users aware of other road or space users; improved pedestrian and cyclist traffic light timings; and a commitment to light rail.
- A secondary public transport priority spine should be developed along the southern suburban centres, including Owhiro Bay, Island Bay, Lyall Bay, Breaker Bay, Seaton, Miramar and Kilbirnie.
- Free public transport during peak hours is suggested as a way to encourage more users.
- Both city and regional councillors should be required to use public transport for council business. This will help drive change among elected officials.
- AC is opposed to removing trolley buses to be replaced by hybrid diesel.
- The effort put into taxi ranks should be refocused to improve public transport.
- Encourage more traffic calming as a way to share road space between cyclists and private vehicles.
- Several inner city blocks are seen as impermeable and need improvement.
- The city needs more cycle-supportive infrastructure such as work place showers and bike parks.
- Further attention needs to be given to getting school children to walk, cycle or use public transport to and from school.
- A digital strategy, encompassing e-commerce, e-commuting and e-freight, needs to be developed to capitalise on the potential of the city and technology.

Tawa Community Board (TCB)

TCB's submission suggests the following:

- Further investment in park and ride, particularly in stations around Tawa.
- Council needs to work with GWRC to increase the capacity of transport to the central city.
- Stebbings Valley is a good area for growth, but a link road to Tawa should not connect with a suburban street.
- The part of Tawa town centre identified as a potential location for intensification should be more clearly defined.
- Tawa does not have the social infrastructure to support growth.
- The quality of housing in proposed growth areas needs to be high.

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- The impacts of Petone to Grenada Link Road and Transmission Gully on Tawa need to be mitigated.
- Support for improvements to the Grenada North Park.
- Support for the skyline walkway link.
- Tawa's resilience would be improved with an additional water reservoir.
- As Tawa is relatively hazard-free, it should be promoted as a location for businesses to locate their backup systems and data.
- Support for the development of additional event venues to promote growth within Wellington, only if a full cost / benefit analysis shows that such proposals 'stack up'.

Friends of the Tawa Bush Reserves

The Friends' submission:

- Opposes any road connection that would impact on the regenerated bush adjacent to the Redwood Bush.
- Encourage further protection of Marshall Ridge and connections to Te Araroa Walkway.

Churton Park Community Association (CPCA)

CPCA's submission suggests:

- Support for the Stebbings Valley to Tawa road connection, as it would:
 - Provide an alternative route, increasing resilience, opening up additional transport options and ensuring development in Stebbings Valley is not a dead end.
 - It would make Tawa facilities are more accessible to Stebbings Valley residents.
 - The location of this road should be detailed in the District Plan.
- Action needs to be taken to close gaps between Westchester Drive, McLintock Street North, McLintock Street and John Sims Drive to enable traffic from Tawa / Churton Park to reach Khandallah, without going through Johnsonville. It will also improve access to services.
- There needs to be a safe means of cycle travel on Willowbank Road and Middleton Road to Westchester Drive.
- There is not enough information in the Plan on the relationship between the city and the region, and no mention of surrounding territorial areas.

The submission also recommends a number of detailed amendments to the Plan.

Johnsonville Community Association (JCA)

JCA's submission supports:

- medium density housing throughout the entire 'outer residential zone';
- suburb-specific design guides - they would allow for outer residential zones to include medium density effectively;
- public subsidies of public transport to support growth;

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- increased cycle infrastructure, but only if it is done from a 'ground up' plan that is designed from first principle for cyclists. Current plans are to fit cyclists on existing roads;
- a review of parking supply and demand, particularly in relation to park and ride. This is a significant issue around Johnsonville train station;
- better natural environment and green spaces in areas of intensification; and
- more endemic native canopy trees to support our biodiversity plans.

JCA's submission opposes:

- targeted intensification in outer residential suburbs - JCA considers that the existing Medium Density Residential Area (MDRA) zones are not successful. MDRA zones should only be within a 25 minute walk of the CBD; and
- the greenfield growth boundaries - limit potential growth, and only a few landowners own most of the identified land.

JCA's submission suggests:

- removing the action to 'consider heritage values and existing neighbourhood character' when identifying areas for intensification as this effectively excludes 'wealthy' areas;
- Johnsonville Town Centre plan needs to be re-written as a priority;
- the Plan does not appropriately deal with housing affordability. This is a particular issue in MDRA areas where JCA perceives there has been a lack of development and economic feasibility issues;
- MDRA zones must mitigate any loss of green space;
- resilience is underplayed in topics such as food security, community support, climate change, sea level rise and infrastructure;
- population projections should be reviewed by a panel of experts; and
- the Plan does not detail where lost development contributions will be recovered.

Mt Victoria Residents' Association (MVRA)

MVRA's submission supports:

- urban design and transport planning encouraging people towards active modes, which in turn reduces fossil fuel dependence;
- the greenhouse gas reduction targets, low carbon public transport, and green buildings. The submissions suggests that the Roads of National Significance projects (and others) are contrary to these goals;
- growth in the central city and along the growth spine;
- development which is energy efficient, water sensitive, well designed and earthquake resilient;
- heritage values and neighbourhood character;
- the hierarchy for transport but considers that this is not carried through to the projects and actions;

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- improving safety and accessibility for pedestrians and cyclists;
- encouraging more public transport uptake, and better bus energy efficiency - although they see the trolley buses as a way of achieving this already; and
- discouraging the provision of commuter parking in the central city, and support park and ride facilities.

MVRA's submission opposes:

- greenfield growth north of the city, as not helping to keep Wellington compact and connected;
- The development of a convention centre and concert venue, for economic reasons; and
- the Roads of National Significance and the Petone to Grenade link road projects.

MVRA's submission suggests:

- Council has an excessive number of planning documents, 28 are listed as influencing the Plan.
- Most projects are listed to occur within the first 10 years (LTP) and not the timeframe of the Plan (30 years).
- Housing and transport require key funding from central or regional governments, and should be opposed when contrary to Wellington City Council goals.
- More emphasis on health and climate change is needed.
- It is wary of a declining regional health according to GWRC Genuine Progress Index, since 2001.
- Health risks from diesel-powered buses are known so they should not be used in Wellington.
- An audit of existing heritage areas, enforcement of demolition and design rules in Mt Victoria, and better education for real estate agents and developers of heritage / character rules.
- Serious consideration must be given to light rail.
- Central city development must be supported by public open spaces, and the number of open spaces should increase.
- Suggest that the plan include provision for community support responses to disasters.

Mt Cook Mobilised (MCM)

MCM's submission supports:

- the plan and its six focus areas; and
- pedestrian and cycle access improvements to Adelaide Road from the west.

MCM's submission suggests:

- Providing access between Government House and the hospital, to the town belt;
- Intensification of Adelaide Road is concerning due to a lack of transport and safety impact information;
- greater provision for children play areas;

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- concerns over intensive residential growth along Adelaide Road, due to walling effect, shade, wind tunnel, blocked views. Also proposed heights are deemed too high;
- that character housing must not be overly impacted by higher density residential; and
- consideration of the impact on the residents should be given if any parking is removed along Wallace Street.

Newtown Residents' Association

- Strong support for the overall concept.
- Supports the bus and cycle improvements, pedestrian safety and car parking in residential areas.
- Good design will be important in ensuring a safe and quality interface between residential intensification areas and public transport spine / cycle way improvements.

Best Farm Ltd and Hunter Hill Ltd

- Generally supportive of the plan.
- Would like greater ability to cluster medium density along transport routes, especially in greenfield areas that are not already designated for medium density i.e. in outer residential zones.
- The eco-village concept needs much more work and is unlikely to be achievable.
- Supports a zone change and structure plan, for the Upper Stebbings area.

Progressive Enterprises Ltd (Countdown)

- Fully supports the key outcomes of the Plan.
- Supports intensification and development along the growth spine.
- Identifies the greenfield growth areas as needing to be supported by retail and services.

Solari Architects

- Support the principles of the Plan.
- High quality development is necessary to accommodate growth and remain a compact city.
- Support the Council's willingness to work with other parties.
- Question what strategies or actions the Council will implement to successfully deliver the vision of the Plan.
- Support incentives for greener buildings, as that is the best way to get developers to start making a change.

The Wellington Company

- The Plan understates the population growth.
- Concentration of development should be in Te Aro and not along the growth spine.

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- Buses must not be powered by diesel but should be electric.
- Supports the improvements for pedestrians and cyclists.
- Heritage is essential to the city's trade capacity and should be supported by financial facilitation to retain it.
- The airport extension is absolutely necessary for the continued growth of the city.

3.2 Tawa Residents

A number of Tawa submitters oppose urban intensification in their suburb. They are specifically concerned with preserving the character of Tawa as a village and retaining existing maximum building heights, protecting the environment and ensuring there is sufficient and appropriate housing for both young families and the older residents.

Of the 51 submissions received from Tawa, 40 were opposed to some form of development in the suburb. Of these, 27 mentioned high buildings ('four storey buildings', 'high rises', 'above two storeys') as a key issue. Submitters mentioned that high buildings could result in a loss of character, create solar access issues, reduce local privacy, increase traffic and parking problems, block local views to and from the hills, and increase crime and safety concerns. An increase in population associated with more houses would also negatively impact on local infrastructure and services.

Another recurring issue for Tawa submitters is the potential link road between Stebbings Valley and Tawa. Of the seven submissions that referenced the link, three were against it, four did not want it to connect to a suburban street, and one was in support of the road as it would provide a larger catchment for local businesses and facilities.

There is some support for intensification in Tawa and other aspects of the Plan. Specifically this includes:

- A moderate amount of densification in Tawa that would provide housing for a variety of people, including older residents is supported. A submitter mentions this could be extended to include Linden.
- There is support for more affordable housing in Tawa.
- Specific areas are seen as more suitable for densification. These are Main Road, Oxford, Cambridge and Surrey streets. The railway stations and around the shops are also seen as potentially suitable.
- Walking in Tawa is important for both transport and recreation. In particular access to the Skyline Track is key. Intensification or traffic work should not impact on this.
- Cycling around the suburb and to the central city is in need of improvement, which would benefit Tawa. This could be done by providing separated cycleways and removing car parking.
- Park and ride facilities need to be maintained and enhanced. This will help support the viability of the town centre and the public transport system.
- The Biodiversity Plan, integrated Catchment Management Plans and ensuring environmentally sustainable design are all important for the Tawa area.

Other comments include:

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- More housing, including affordable options, is required in Tawa. Conversely, other submitters suggested that Tawa already has enough supply of affordable housing.
- The Roads of National Significance projects should be removed as projects or at the least, have effects mitigated properly. There was also mention of the Petone to Grenada link, which could be provided underground.
- Some submissions reported good roads, access and public transport, as well as local services, facilities and infrastructure. While other submissions mentioned that it was underserved and any expansion in housing and population would exacerbate the issue.
- Tawa has flat parts around the centre that are suitable for elderly residents. These sites have easier access to the local facilities.
- Ensuring a walkable and cycle friendly suburb assists with residents' health.
- Light rail should be proposed for the central city.

3.3 Individual's Submissions

Individual submissions were received from: Ron Beemink, Andrew Bowman, Isabella Cawthorn, David Edmonds, Phil Hayward, Greg Lee, Sophie Mormede, Carolyn Nimmo, Tony Randle, Pauline and Athol Swann, Sue Teng, Sue Watt and Robert Weinkove.

Individual's submissions were received from a range of suburbs around Wellington and the region. The submissions came from Brooklyn, Island Bay, Karori, Kelburn, Miramar, Mt Victoria, and Wadestown; while regional submissions came from Plimmerton (Porirua), and Naenae (Lower Hutt).

The majority of submissions were fully, or partially supportive of the Plan. Some noted that the Plan lacks the implementation details that would allow for a more complete understanding and submission.

The key themes of the submissions are:

- Residential intensification – generally supported in the central area, in medium density areas and along the growth spine where growth is supported by quality public transport, infrastructure and community facilities. Some express doubts over the success of existing MDRAs.
- Greenfield development – supported by some and opposed by others.
- Pedestrian and cycling improvements are supported, including recreational cycling.
- Public transport improvements are supported including a dedicated bus corridor, sustainable mode choices, lower fares and integrated ticketing.
- The Roads of National Significance and Petone to Grenada link road – opposed by some.
- Commuter car parking - supported by some and opposed by others.
- On-street car parking – some suggested this should be removed to facilitate public transport improvements and demand-responsive pricing meters.
- Vehicle speeds - should be lowered around centres and along Great Harbour Way to promote cycling.
- Open spaces and playgrounds - should accompany any intensification plans.

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- Investment needed in Te Aro Park, Frank Kitts Park, Watts Peninsula, North Kumutoto and other open spaces.
- The importance of protecting our natural environment and historic values and minimising the environmental impact of urban development.
- Support for greenhouse gas emissions reduction targets and energy efficient buildings.
- Water Sensitive Urban Design - targets should be added for both the Council and private developers.
- Support for community preparedness to hazards, resilience and responding to climate change.
- Concern over the resilience of low-lying urban areas.
- Support for the rental Warrant of Fitness.
- Convention centre or airport extension – some do not support investment by Council in these projects.
- Review of venues – some suggest current venues are adequate.
- Aging population and public health – some suggest the Plan needs to better address these issues.
- Maori heritage – could be celebrated along Great Harbour Way.
- Regional context – the Plan needs to better reflect the relationship between the city and the region.
- Processes – some suggest Council should improve consent processes.