



Resource Consent Application

on behalf of

Wellington City Mission

Temporary Ground Level Car Park
28-32 Adelaide Road, Mount Cook

April 2025



Quality Control

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Prepared by	Tom Anderson
	
Reviewed by	Hannah McCashin
	

Limitations:

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1 Introduction

This assessment is provided in accordance with the requirements of section 88 of the Resource Management Act 1991 (the RMA or the Act) and the Fourth Schedule to the Act. It forms the resource consent application made on behalf of the Wellington City Mission, to use the currently vacant site at 28-32 Adelaide Road as a ground level car park until such time as a building is constructed on the site.



Figure 1: 28-32 Adelaide Road as at 2 April 2025

2 Site Description

2.1 Legal Description and Record of Title

The subject site is legally described as Lot 1-2 DP 11151, Part Lot 2 DP 10531, Section 1403 Survey Office Plan 23605, collectively held in Record of Title WN46B/773 (copy attached in Appendix A). There are no relevant interests recorded on the title.

2.2 Site and Surrounding Area

The site has a total area of 2,016m² and a largely rectangular shape with frontage to Adelaide Road to its east, Douglas Street to the north and Myrtle Crescent to the west. As can be seen from Figure 1, the site is currently vacant. It previously contained a service station (which can be seen in the aerial photograph below), which was demolished in 2020.

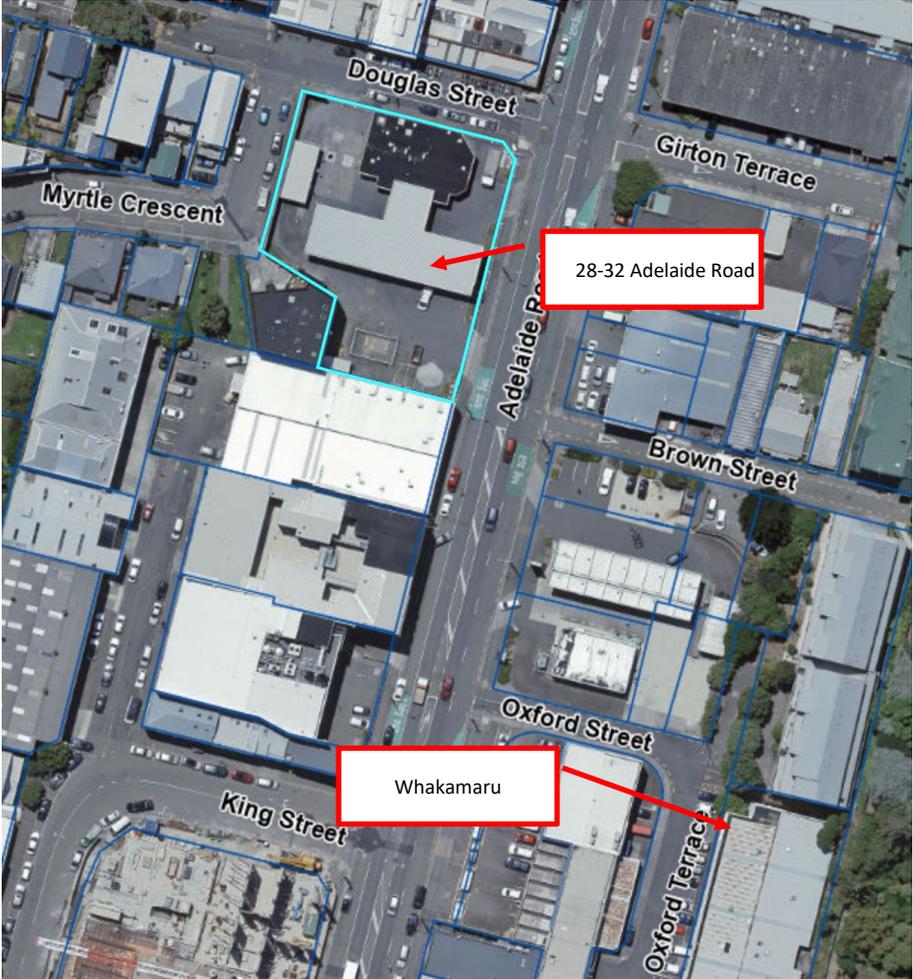


Figure 2: Site and Surrounds

The adjoining properties to the south contain commercial buildings, with a two-storey building fronting Adelaide Road (and having a featureless façade facing the subject site), and a four-storey building

fronting Myrtle Street (with a featureless façade at ground level facing the subject site, and high level windows above ground level).

Residential buildings exist on the opposite side of Myrtle Street, with commercial buildings generally associated with the motor vehicle industry on the northern side of Douglas Street. The opposite side of Adelaide Road contains commercial buildings, generally two storeys high, and a service station.

As can be seen on Figure 2 above, Wellington City Mission's building, called Whakamaru, is located approximately 95m southeast of the site, on Oxford Terrace, immediately adjacent to the aforementioned service station.

Whakamaru is a community facility which contains long-term transitional housing, Wellington City Mission's network of support services, as well as a café that is open for anyone to use. Whakamaru is operational 24 hours a day, 7 days a week, with 120 people working in the building on a daily basis, and up to 400 daily visitors.

The subject site is flat, as is the surrounding land to the north, east and south. The land slopes up from the western boundary of the site.

2.3 Wellington City 2024 District Plan

28-32 Adelaide Road is zoned City Centre in the Wellington City 2024 District Plan (the PDP).

The following Specific Controls, Overlays or Designations in the PDP are identified on the site:

- Height Control Area: 42.5m;
- Active Frontage;
- Verandah Control;
- Flood Hazard Overlay – Inundation Area;
- Flood Hazard Overlay – Overland Flowpath; and
- Centres – Moderate Noise Area.

Further, the Wellington Airport Obstacle Limitation Surfaces (PDP Designation ID: WIAL1), exists at a height of 49m above the site.

2.4 Operative Wellington City District Plan

28-32 Adelaide Road is zoned Centre in the Operative Wellington City District Plan (the ODP) and is within the Hazard Area (Ground Shaking) Overlay. Adelaide Road where it passes the site is identified as a Secondary Frontage.

2.5 Wellington Regional Council Selected Land Use Register

Given the site's previous use as a service station, it is identified on the Greater Wellington Regional Council (GWRC) Selected Land Use Register (SLUR) as being contaminated (reference SN/05/160/02).

3 Background

In the time that has elapsed since the service station was demolished in 2020, a resource consent had been approved for a mixed use residential and commercial/retail development (and associated contaminated land disturbance) on the site, by a private owner (Council reference SR493000). That development did not progress, with the site being sold in the interim to Kāinga Ora, who had intended to undertake a development. Kāinga Ora have now advised the applicant that they do not have any plans to develop the site and intend to put the site on the market.

The site has been used as an unconsented ground level commercial car park from 2021 to 2024, as evident in the series of Google Streetview photos below.



Figure 3: Ground Level Car Park at the Subject Site (Google Streetview)

In October 2024, it is understood that Wellington City Council compliance officers advised Kāinga Ora of the requirement for resource consent to continue operating the car park. The use of the site as a car park ceased at that point. From October 2024 to December 2024. The Wellington City Mission were utilising some of these spaces on a free basis as an interim measure until they got full access to Whakamaru. The current chain link fence was erected, stopping this use. The site and has been unused since then.

4 The Proposal

Whakamaru generates a significant amount of activity, with most people arriving or departing via motor vehicle. The intent of the facility is for it to be accessible by the whole community, and currently they consider access is restricted through a lack of available car parking.

As stated earlier, when the subject site was available as car parking it was used by Whakamaru staff and visitors. Since the car parking ceased on the site, the Wellington City Mission have been exploring alternative arrangements. These continue to be a work in progress.

However, as an interim measure, the Wellington City Mission are seeking resource consent to temporarily reinstate 28-32 Adelaide Road’s use as a ground level car park. The applicant has an agreement in place with Kāinga Ora as the current landowner for this to occur, should the Wellington City Mission obtain the necessary approvals from the Council. There is no guarantee that this agreement will continue once Kāinga Ora have sold the site. However, the Wellington City Mission would seek to establish an agreement with the new owner for the car parking use to continue until such time the new owner establishes a new use on the site.

Given the temporary nature of the use of the site, the Wellington City Mission do not propose to undertake much in the way of physical works. A plan has been drawn (Appendix B, and excerpt below), which shows how the temporary car park would work.

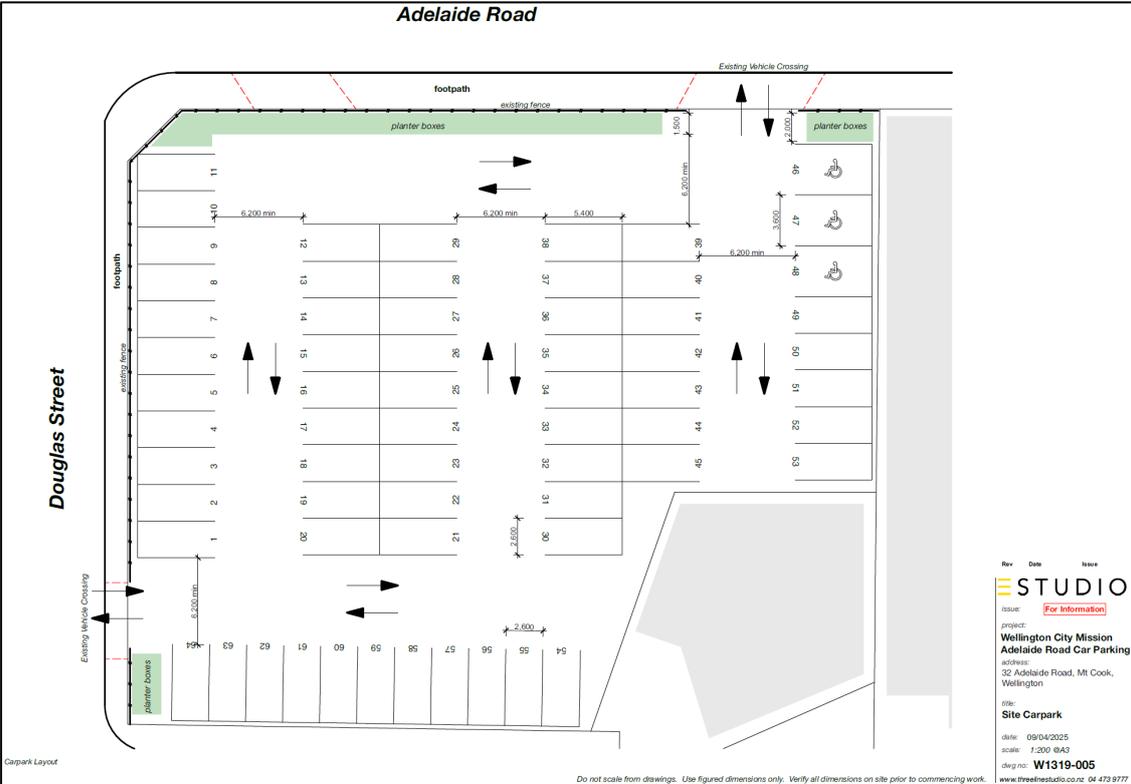


Figure 4: Proposed Car Park Layout

By way of a summary, site has space for 64 cars to be parked in accordance with NZS2890, which would be able to enter and exit the site through the existing southernmost vehicle crossing on Adelaide Road,

as well as the existing vehicle crossing on Douglas Street. As these were vehicle crossings which were utilised for the site’s previous use as a service station, they are considered appropriate for the proposed car park. It is noted that for the Douglas Street crossing, it is adjacent to a solid wall. However, as can be seen in Figure 5, there is an existing fence post which prevents cars exiting the site from being immediately adjacent to that solid wall. The fence post will be retained and as such will assist with providing better sightlines along the footpath at this vehicle access.

Note, the northernmost formed vehicle access on Adelaide Road will not be used, and will be blocked by a planter box.



Figure 5: Douglas Street Vehicle Crossing

Planter boxes are proposed along the site’s eastern boundary (adjoining Adelaide Road) and at certain locations along the northern, to improve the interface with the streetscape. The intent for these planter boxes is that they also detail the Wellington City Mission’s supporters and sponsors. As such, advertising signs may be affixed to the front face. Such signs would be no bigger than the size of the planter box, and as such less than 8m² in area and 6m in height.

No changes are proposed to the current surfacing of the site. This will be retained¹. As can be seen from Figures 1 and 5, the site is sealed for the most part and is metalled where the previous building

¹ Consideration was given to providing a sealed surface for the first 6m inside of the site from the Douglas Street vehicle access. However, given that the site is on the SLUR, this would create soil disturbance, which the pre-application notes from the Council advise against.

was. It is noted that the metal has, and will continue to, spread onto the surrounding footpath. To mitigate this, the following condition is proposed:

- *At least once a week, the Consent Holder must sweep the Douglas Street footpath to remove any metal that is situated on the footpath which may have its origin on 28-32 Adelaide Road.*

The car parking is proposed only for persons connected with Whakamaru, and not for any commercial purpose. The following condition is proposed to limit parking on the site to those using Whakamaru:

- *All vehicles parked on the site at any given time must either be staff, residents, supporters or visitors of Whakamaru Wellington City Mission (located at 4 Oxford Terrace). No other vehicles may park at 28-32 Adelaide Road.*

Finally, to ensure the finite use of the site as a ground level car park. The following condition is proposed:

- *The use of the site as a ground level car park must cease at the point in time a building consent is implemented or other activity commences on the site.*

The proposed use of the site as a car park is not a long term feasible economic proposition for the landowner. As such, the Wellington City Mission's leasing arrangements for the site will require that it be vacated at the point when the landowner implements another feasible activity on the site. The intent of the above condition is to provide Council surety that the proposed ground level car park will be required to cease when the landowner implements a different activity on the site.

Consideration was given as to whether the above condition should be restricted to a specified timeframe however as tenure is unknown, the appropriate timeframe to set is also unknown. A timeframe of say five years could be specified in the condition and yet once the land is sold by Kāinga Ora the new landowner may not want to continue the parking. The timeframe for sale is unknown, but Wellington City Mission have been informed that the marketing of the site for sale is imminent. Further, if a timeframe of say one year was specified in the consent, yet a new activity was not started on the site for a period of say five years, then it is inefficient to have to continue applying for subsequent resource consents to continue the use of the parking (particularly given, as highlighted below, that the rule framework for a ground level car park requires public notification of the resource consent application, which has significant cost associated with it).

Ultimately it is better that the site is used, as a car park, until such time as a different activity is implemented on the site, rather than the alternative, which is a continuation of the current vacant use which has extremely limited contribution to the streetscape and the vibrancy of Adelaide Road.

5 Rule Assessment and Activity Status

There are two District Plan's which this resource consent application requires consideration under, as follows:

- The Wellington City 2024 District Plan (PDP) contains provisions relevant to the zone, and natural hazard overlays, as well as three waters infrastructure and noise (which are beyond challenge) as well as provisions relevant for signage and vehicle use (on which decisions are yet to be made and as such have not been assessed).
- The Operative Wellington District Plan (ODP) contains the operative provisions for signs and vehicle use.

Also relevant, given the site's SLUR registration, is the *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011* (NESCS).

5.1 Wellington City 2024 District Plan

5.1.1 City Centre Zone

Rule CCZ-R18, titled *Carparking Activities* permits car parking in the City Centre Zone where specific matters are met. These matters only allow car parking areas at ground floor level where they form part of a building specifically constructed and used for carparking purposes (subclause 1(a)(iv)) or are located to the rear of the site and are not visible from the street (subclause 1(a)(v)). As these cannot be met by the proposal, it becomes a **Discretionary Activity** under Rule CCZ-R18.2.

This rule has legal effect under Part 1, Schedule 1 of the RMA, however it is noted that it has been appealed by Foodstuffs North Island Limited.

There are no other relevant City Centre Zone rules.

5.1.2 Natural Hazards

While the site is within the flood hazard overlay, the proposal is a *less hazard sensitive activity* and therefore is a **Permitted Activity** under Rule NH-R1. No buildings are proposed and therefore Rules NH-R4 and NH-R5 are not relevant. This rule has legal effect.

5.1.3 Three Waters Infrastructure

With the exception of Rule THW-R3 (which refers to *development*), all other rules in the three waters chapter relate to buildings. As no buildings are proposed, these rules are irrelevant. Rule THW-R3 specifies that new structures must prevent water runoff which contains copper or zinc. The planter boxes, being the only proposed structures, will not use copper and zinc. Therefore Rule THW-R3 is also irrelevant.

5.1.4 Noise and Vibration

The only relevant rule is NOISE-R1. Compliance is achieved with NOISE-R1 where the standards in NOISE-S1 and APP4 are met. These concern maximum noise emissions from the site. These will not be exceeded for car parking activities. As such, noise is a **Permitted Activity**.

5.2 Wellington City Operative District Plan

5.2.1 Transport

Under Rule 7.1.1, any activity is a permitted activity provided that it complies with the standards specified in section 7.6.1, except an activity that provides more than 70 parking spaces. In this instance, less than 70 spaces are proposed. Consequently the activity status is set through compliance with the specified standards, and Rule 7.3.1 is not applicable.

The relevant specified standards are those in 7.6.1.5 (Parking, Servicing and Site Access). These are assessed as follows:

Table 1: Assessment of Relevant ODP Transport Standards

Relevant Standards	Compliance Assessment
<i>7.6.5.1 All parking shall be provided and maintained in accordance with sections 1, 2 and 5 of the joint Australian and New Zealand Standard 2890.1 - 2004, Parking Facilities, Part 1: Off-Street Car Parking.</i>	Complies – the spaces and circulation detailed on the plan attached in Appendix B have been designed to comply with NZS2890
<i>7.6.1.5.2 Where carparking is located within a building, a minimum height clearance of no less than 2.2 metres is required.</i>	Not Applicable – the parking is not located in a building.
<i>7.6.1.5.3 The gradient for carparking circulation routes shall not be more than 1 in 8.</i>	Complies – the site is flat.
<i>7.6.1.5.4 Open vehicle parking areas or parking at ground level within a building must not be situated at ground level at the front of sites where standard 7.6.2.7 (Primary and Secondary Street Frontages) applies.</i>	Does not comply – Adelaide Road where it passes the site is identified as a Secondary Frontage.
<i>7.6.1.5.5 On each site in Centres (excluding Neighbourhood Centres), at least one loading area shall be provided</i>	Does not comply – no loading area is proposed.
<i>7.6.1.5.9 Site access shall be provided and maintained in accordance with section 3 of the joint Australian and New Zealand Standard 2890.1 – 2004, Parking Facilities, Part 1: Off-Street Car Parking.</i>	Complies – the existing site accesses are assumed to comply with NZS2890.

As standards 7.6.1.5.4 and 7.6.1.5.5 are not met, the application becomes a **Restricted Discretionary Activity** under Rule 7.3.5.5, with Council’s discretion limited to the effects generated by the standards not being met.

5.2.2 Signage

Under Rule 7.1.6, signs are a permitted activity provided they comply with the standards specified in 7.6.3. These are assessed as follows:

Table 2: Assessment of Relevant ODP Signs Standards

Relevant Standards	Compliance Assessment
7.6.3.1.1 Any sign (excluding signs below verandah level) that is illuminated must not flash, or must not contain moving images, moving text or moving lights	Not Applicable – the signs will be below verandah level and will not be illuminated, nor contain moving images, text or lights.
7.6.3.1.2 Any sign located on a building	Not Applicable – no sign will be on a building.
7.6.3.1.3 In addition to 7.6.3.1.2, no sign shall be for the purpose of third party advertising.	Does not comply – the signs will display third party advertising by displaying the name of Wellington City Mission sponsors and supporters.
7.6.3.1.4 For one free-standing sign or sign located on a structure: <ul style="list-style-type: none"> • the maximum area is 8m². • the maximum height is 6m • only one sign is permitted on any site frontage 	Does not comply – The sign area and height will comfortable be met, but there will be more than one sign per frontage.

As standards 7.6.3.1.3 and 7.6.3.1.4 are not met, the application becomes a **Restricted Discretionary Activity** under Rule 7.3.12, with Council’s discretion limited to the effects generated by the standards not being met.

5.3 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

As the site is contaminated, the NESCS applies. As the use of the site for car parking has not been previously approved, the proposal changes the use of the site. The change of a site’s use is permitted under Regulation 8(4) where:

- (a) a preliminary site investigation of the land or piece of land must exist:
- (b) the report on the preliminary site investigation must state that it is highly unlikely that there will be a risk to human health if the activity is done to the piece of land:
- (c) the report must be accompanied by a relevant site plan to which the report is referenced:
- (d) the consent authority must have the report and the plan.

A Detailed Site Investigation (DSI) of the land was included as part of SR493000, and as such is held by Council. However, as that was prepared for a different activity, it does not state that it is highly unlikely that there will be a risk to human health if the activity is done to the piece of land. The DSI submitted concludes that the risk to human health is acceptable. However, as there is no Preliminary Site Investigation in place, Regulation 8(4) is not met.

Regulation 9(3) provides for a site’s change of use as a Controlled Activity where:

- (a) a detailed site investigation of the piece of land must exist:*
- (b) the report on the detailed site investigation must state that the soil contamination does not exceed the applicable standard in regulation 7:*
- (c) the consent authority must have the report:*
- (d) conditions arising from the application of subclause (4), if there are any, must be complied with.*

As stated, a DSI exists, and this is held by the Council under file SR493000. This report concludes that all samples complied with the applicable human health criteria. Based on these results, it is considered that the risk to human health is acceptable at the sampled locations (Section 9.0 of the DSI for SR493000). As such the proposal is a **Controlled Activity** under Regulation 9(3).

5.4 Overall Activity Status

In summary, resource consent is sought under:

- Rule CCZ-R18.2 of the Wellington City 2024 District Plan as a Discretionary Activity for ground level car parking;
- Rule 7.3.5.5 of the Operative Wellington District Plan as a Restricted Discretionary Activity for ground level car parking;
- Rule 7.3.12 of the Operative Wellington District Plan as a Restricted Discretionary Activity for signage; and
- Regulation 9.3 of the NESCS as a Controlled Activity for changing the use of a contaminated site.

Overall, as the activities are bundled together and form part of the same proposal, resource consent is required as a **Discretionary Activity**.

6 Assessment of Environmental Effects

The following provides an assessment of the actual and potential effects of the proposal, in accordance with section 88 and the Fourth Schedule to that Act.

6.1 Streetscape Effects

Both the ground level car park and the signage have the potential to affect the streetscape. The key consideration to assess this matter is the existing environment. The existing environment, as shown in Figures 1 and 5 above, is a vacant site, surrounded by a chain link fence, with weeds growing where possible and graffiti on the walls. The existing environment makes a very poor contribution to the streetscape.

The proposal, while not being the ultimate outcome for the site, will improve the existing environment, as well as provide a strong link between the site and Whakamaru, strengthening the passing community's awareness of this facility.

The streetscape along Adelaide Road will be improved with the inclusion of planter boxes, adding a green element to the current hash greyness. The planter boxes, as well as the signage, which will be directly associated with Whakamaru, will brighten this area up, improving the site's current aesthetic.

The car park will also provide a degree of activation to the site. The existing environment has no activation. With the site being used as a car park, it will at least have some movement and activity which cannot be achieved under the existing environment.

The site's use as a car park will also not prevent any future City Centre use. The proffered condition of consent is that the car park must cease when the owner wants to undertake a different activity on it. The proposal does however offer activation and an improved streetscape between now and whenever that occurs, as opposed to the alternative of leaving the existing environment as is.

Given the existing environment, and the temporary use of the site for the proposed car park purpose, the proposed use is considered to have a positive effect on streetscape.

6.2 Contaminated Land Effects

The matters of control under Regulation 9(3) and 9(4) of the NESCS are site sampling, laboratory analysis and risk assessment. The site sampling and laboratory analysis was undertaken for a previous resource consent, and was considered sufficient for that process. As such it is sufficient under the same regulation for this application.

In terms of a risk assessment for this current application, as the proposal does not include any disturbance of the current site surface, the risk is considered to be negligible.

6.3 Loading Zone Effects

No loading zone is required as there is no activity undertaken on the site which requires goods be loaded. As such, the non-compliance with ODP Permitted Standard 7.6.1.5.5 has no actual or potential effects.

6.4 Overall Effects Assessment

Overall, based on the above, the existing site use, and the proffered conditions, the proposal will have less than minor adverse environmental effects. The proposal will also give rise to positive effects in terms of activation when compared to the current site use.

7 Section 104 Assessment

Section 104(1) of the RMA provides that, when considering an application for resource consent, the consent authority must, subject to Part 2 of the RMA, have regard to:

- The actual and potential effects of the activity on the environment;
- Relevant plan and policy statement provisions; and
- Any other matter the consent authority considers relevant and reasonably necessary to determine the application.

This section assesses the proposal against these relevant matters. It also briefly addresses the other potentially relevant factors listed in the remainder of section 104 of the RMA, and concludes with an assessment considering the Purpose and Principles of the Act.

7.1 Section 104(1)(a)

Section 104(1)(a) requires the consent authority to have regard to *any actual and potential effects on the environment of allowing the activity*. An assessment of environmental effects is provided above in Section 6 of this application.

7.2 Section 104(1)(b)

Section 104(1)(b) requires the consent authority to have regard to any relevant provisions of:

- A national environmental standard;
- Other regulations;
- A national policy statement;
- A New Zealand Coastal Policy Statement;
- An operative or proposed regional policy statement; and
- Relevant operative or proposed plans.

An assessment of the applicable rule framework as provided for under the ODP, PDP and NESCS as relevant is provided in Section 5 above. In terms of objectives and policies, the following documents are considered to be relevant under section 104(1)(b).

- The National Planning Statement on Urban Development (NPS-UD);
- The Regional Policy Statement for the Wellington Region 2013 (RPS);
- The PDP; and
- The ODP.

7.2.1 The National Planning Statement on Urban Development

The NPS-UD directs local authorities to ensure that they provide enough space for their populations to happily live and work. This can be both through allowing development to go “up” by intensifying existing urban areas, and “out” by releasing land in greenfield areas.

It directs how Councils are to make decisions and plans through the provision of 8 objectives and 11 policies. These are analysed in respect of the proposal below:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) enable Māori to express their cultural traditions and norms; and**
- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) support reductions in greenhouse gas emissions; and*
- (f) are resilient to the likely current and future effects of climate change.*

Whakamaru is a facility which caters for community wellbeing. As part of achieving this ethos, it requires access, and many people access the site via motor vehicle. The proposal will provide for this access on a currently vacant city centre zoned site, and with the proffered conditions in place, the land use sought under this resource consent will not prevent any future development of another city centre activity or building on this site.

Objective 4: *New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*

- (d) *any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- (e) *the likely current and future effects of climate change.*

The proposed use of the vacant site, with the proffered conditions in place, allow for the land to be used for a finite time until there is demand for a new building or other activity to be undertaken on the site. Having the site used, rather than continuing to be vacant until a time that there is demand for a new building or other activity provides for greater activation than the status quo, assisting with the site's contribution to a well-functioning urban environment.

Objective 5: *Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).*

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) *involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and*
- (b) *when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and*
- (c) *provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and*
- (d) *operate in a way that is consistent with iwi participation legislation.*

Through being consistent with the RPS and PDP, the proposal takes into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Objective 6: *Local authority decisions on urban development that affect urban environments are:*

- (a) *integrated with infrastructure planning and funding decisions; and*
- (b) *strategic over the medium term and long term; and*
- (c) *responsive, particularly in relation to proposals that would supply significant development capacity.*

The site is well served by existing infrastructure.

7.2.2 Regional Policy Statement for Greater Wellington

With regard to Wellington's urban area, the RPS seeks the following:

Objective 22: *A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:*

- (e) Urban development in existing urban areas, or when beyond urban areas, development that reinforces the regions existing urban form;**
- (i) integrated land use and transportation;**
- (k) efficiently use existing infrastructure (including transport network infrastructure);**

Policy 33: Supporting a compact, well designed and sustainable regional form – Regional Land Transport Strategy

Policy 54: Achieving the region’s urban design principles

Policy 55: Maintaining a compact, well designed and sustainable regional form

The application proposes to use a vacant site for carparking for a finite time period. This provides for an efficient use of the site without adversely affecting the existing surrounding environment. For these reasons the proposal is considered to give effect to Objective 22 and Policies 33, 54 and 55 of the RPS.

Change 1 to the RPS was notified on 19 August 2022 and included:

- *Enabling urban development and infrastructure in appropriate locations. Encouraging more intensive urban development that is sensitive to the environment and meets the needs of more people.*
- *Developing objectives with our mana whenua partners to protect our waterways, including:*
 - *How Te Mana o Te Wai applies to freshwater in the region.*
 - *Long-term visions for freshwater bodies in areas with completed whitua processes.*
- *Responding to the climate emergency:*
 - *Through provisions to reduce emissions.*
 - *By recognising the role that natural ecosystems play.*
 - *By reducing the impacts of climate change.*
- *Strengthening the existing provisions for indigenous ecosystems to maintain and restore ecosystem processes and biodiversity generally, not just significant biodiversity.*

Both the submission and further submission periods have now closed, and hearings have commenced; however, no decisions have been released. The proposal is considered to be consistent with Change 1

7.2.3 Wellington City 2024 District Plan

The relevant objectives of the PDP for this proposal are identified and assessed as follows.

CCZ-01 ***Purpose – The City Centre Zone continues to be the primary commercial and employment centre servicing Wellington and the wider region, supported by***

residential and a diverse mix of other compatible activities that reflect its role and function in the hierarchy of centres.

CCZ-O2

Accommodating growth – The City Centre Zone plays a significant role in accommodating residential, business and supporting community service growth, and has sufficient serviced development capacity and additional infrastructure to meet its short, medium and long term residential and business growth needs, including:

- 1. A variety of building type, size, affordability and distribution, including forms of high-density housing;*
- 2. Convenient access to active and public transport activity options;*
- 3. Efficient, well integrated and strategic use of available development sites; and*
- 4. Convenient access to a range of open space, including green space, and supporting commercial activity and community facility options.*

CCZ-O5

Amenity and design – Development in the City Centre Zone positively contributes to creating a high quality, well-functioning urban environment, including:

- 1. Reinforcing the City Centre Zone’s distinctive sense of place;*
- 2. Providing a quality and level of public and private amenity in the City Centre Zone that evolves and positively responds to anticipated growth and the diverse and changing needs of residents, businesses and visitors;*
- 3. Maintaining and enhancing the amenity and safety of public space;*
- 4. Contributing to the general amenity of neighbouring residential areas while achieving the planned urban form of the City Centre Zone;*
- 5. Producing a resilient urban environment that effectively adapts and responds to natural hazard risks and the effects of climate change;*
- 6. Protecting current areas of open space, including green space, and providing greater choice of space for residents, workers and visitors to enjoy, recreate and shelter from the weather; and*
- 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to Māori.*

CCZ-P2

Potentially incompatible activities – Only allow activities that are potentially incompatible with the purpose of the City Centre Zone, where they will not have an adverse effect on its vitality, vibrancy, amenity, resilience and accessibility. Potentially incompatible activities include:

- 3. Carparking at ground level;*

CCZ-P6

Adaptive use – Encourage new development and redevelopment in the City Centre Zone that is sustainable, resilient and adaptable to change in use over time, including enabling:

- 1. Sufficient flexibility for ground floor space to be used and converted for a range of activities; and*
- 2. Residential activities at ground floor level along streets that are not subject to active frontage and/or verandah coverage requirements.*

As has been stated throughout this application, the proposal is for a finite use of a vacant site, and will cease operating when the site is used for a Central City activity. With a condition proffered to this effect, the proposal does not limit the site's ability to be used for its zoned purpose, while in the interim activating a vacant site, with the use of the site contributing to Whakamaru, which is a community service as recognised in CC-O2.

The use of the site will improve its current contribution to amenity and safety.

While the use is listed as a potentially incompatible activity under CCZ-P6, the proposal is enabled under that policy as the proposal will provide for an improvement in the short term of the site's contribution to vitality, vibrancy, amenity and accessibility, and does not impact resilience. Further, through the aforementioned proffered condition, the proposal will not impact on the site's long term contribution to vitality, vibrancy, amenity, accessibility and resilience, as the car park will cease when a City Centre activity is implemented on the site.

Strategic Direction: Capital City

CC-O2

Wellington City is a well-functioning Capital City where:

- 1. A wide range of activities that have local, regional and national significance are able to establish and thrive;***
- 2. The social, cultural and economic wellbeing of current and future residents, and the environment is supported;***

The proposal assists Whakamaru, as an existing activity of local and regional significance, to thrive. Whakamaru provides for the social wellbeing of Wellington residents.

Strategic Direction: City Economy, Knowledge and Prosperity

CEKP-O4

Land within the City Centre, Centres, Mixed Use, and General Industrial Zones is protected from activities that are incompatible with the purpose of the relevant zone or have the potential to undermine the City's hierarchy of centres.

Through the proffered conditions, the proposed land use will not undermine the ability of the site to be used for its City Centre zoned purpose.

Strategic Direction: Strategic City Assets and Infrastructure

SCA-O2

New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:

- 1. Can meet the development infrastructure costs associated with the development, and***
- 2. Supports a significant increase in development capacity for the City.***

The proposal is sufficiently supported by existing infrastructure.

Urban Form and Development

UFD-O1

Wellington's compact urban form is maintained with the majority of urban development located within the City Centre, in and around Centres, and along major public transport corridors.

The proposal maintains Wellington's existing urban form through making use of a currently vacant site.

Overall, the proposal is consistent with the direction set in the relevant objectives and policies of the PDP.

7.2.4 Operative District Plan

The relevant objectives of the ODP for this proposal (being limited to transport matters and signage) are as follows.

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

Policy 6.2.5.3 ***Ensure that activities and developments that have the potential to generate significant levels of traffic incorporate design features and/or contribute to other activities so that traffic generation is minimised, and the use of public transport and active modes actively facilitated and encouraged.***

Policy 6.2.5.4 ***Ensure that the location and design of activities and developments that generate significant levels of traffic or provide high levels of on-site parking are accessible by multiple transport modes and do not result in:***

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

Policy 6.2.5.8 ***Require the provision of appropriate servicing and site access for activities in Centres.***

The number of car parks provided for is less than what the rules specify as *significant levels of traffic* (being 70 or more car parking spaces). As the site is only proposed to be used for car parking under this resource consent, it does not require loading, and the existing site accesses, which were formed for the site's previous use as a service station, are appropriate for its proposed use.

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

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

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

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

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

The proposed signage is well integrated, being limited to the sides of the planter boxes, at a low level, and only displaying sponsors of the Wellington City Mission. The scale and intensity is appropriate in the immediate surrounds, which, while there are clear aspirations under the PDP for it to develop into a vibrant city centre area, the current characteristics are more of a transitional space between the central city and suburbia, with a mix of land uses, varied building heights and large open, undeveloped or motor vehicle oriented spaces. Therefore, it is considered that the proposal will positively contribute to the visual amenity of the neighbourhood and cityscape.

Overall, the proposal is consistent with the direction set in the relevant objectives and policies of the ODP.

7.3 Section 104(1)(c)

Under section 104(1)(c), the Council must have regard to any other matter the consent authority considers relevant and reasonably necessary to determine the application. In this instance there are no other matters for consideration.

8 Part 2 Matters

The purpose of the RMA as expressed in section 5 is to promote the sustainable management of natural and physical resources, with 'sustainable management' defined in section 5(2) as:

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

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Part 2 also sets out matters of national importance to be recognised and provided for (section 6), other matters to be had particular regard to (section 7) and requires the principles of the Treaty of Waitangi to be taken into account (section 8).

Part 2 is expressed in the PDP and ODP, and as such, there is no direct requirement to assess Part 2 for this resource consent application.

However, for completeness, the proposal accords with Part 2 as it promotes sustainable management through the use of an existing vacant site. Using a vacant site for the proposed purpose will not result in any other development plans for the site being truncated, and as such, having the site used for a specific purpose, being car parking for Whakamaru, while a more permanent use of the site is being developed, is considered to be an efficient use of a physical resource, as provided for under Section 7(b) in Part 2.

There are no matters of national importance under Section 6 which are directly applicable, and through the framework provided by the PDP, RPS and NPSUD, the proposal takes into account the principles of the Treaty of Waitangi.

9 Consultation

A pre-application meeting was held with Wellington City Council on 2 April 2025. The outcome's from this meeting have shaped this application in terms of confirming the applicable rule framework, mitigation (particularly in the use of planter boxes to improve the Adelaide Road street edge visual from its current form), and proffered conditions.

No other consultation has occurred. Consideration was given to consulting with Wellington Water Limited and GWRC. However, as the proposal does not require resource consent under the Three Waters Chapter of the PDP, there is nothing to be gained from consulting Wellington Water Limited. Likewise, as no physical works to the site (aside from the planter boxes) are proposed, there is no need to consult GWRC.

10 Notification

An application for resource consent made in respect of Rule CCZ-R18.2.a must be publicly notified. As such, this is requested.

It is noted that in the Foodstuffs North Island Limited appeal against this rule, they state that part of the reason for the appeal is that *the purpose of public notification is not to discourage certain activities from occurring*. In the relief sought in the appeal, they seek an amendment *to remove mandatory public notification of resource consent applications made in respect of rule CCZ-R18.2.a*.

However, it is understood that this appeal does not alter the legal effect status of the rule.

11 Conclusion

This resource consent application seeks resource consent to use the currently vacant site at 28-32 Adelaide Road as a ground level car park, with planter boxes and signage to be included along the site's frontage to Adelaide Road, until such time as a City Centre Activity is established on the site. The parking provided for would be used solely in relation to activities associated with the Wellington City Mission's nearby Whakamaru facility on Oxford Terrace.

The proposal meets the statutory tests of the RMA and is consistent with its purpose and principles. Effects are considered to be less than minor, and positive when considering the existing environment. To this end it is considered that the sustainable management purpose of the RMA will be achieved by granting the resource consent.

Appendix A: Record of Title



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R. W. Muir
Registrar-General
of Land

Identifier **WN46B/773**

Land Registration District **Wellington**

Date Issued 08 August 1995

Prior References

WN27D/280 WN46C/605

Estate Fee Simple
Area 2016 square metres more or less
Legal Description Section 1403 Survey Office Plan 23605,
Part Lot 2 Deposited Plan 10531 and Lot
1-2 Deposited Plan 11151

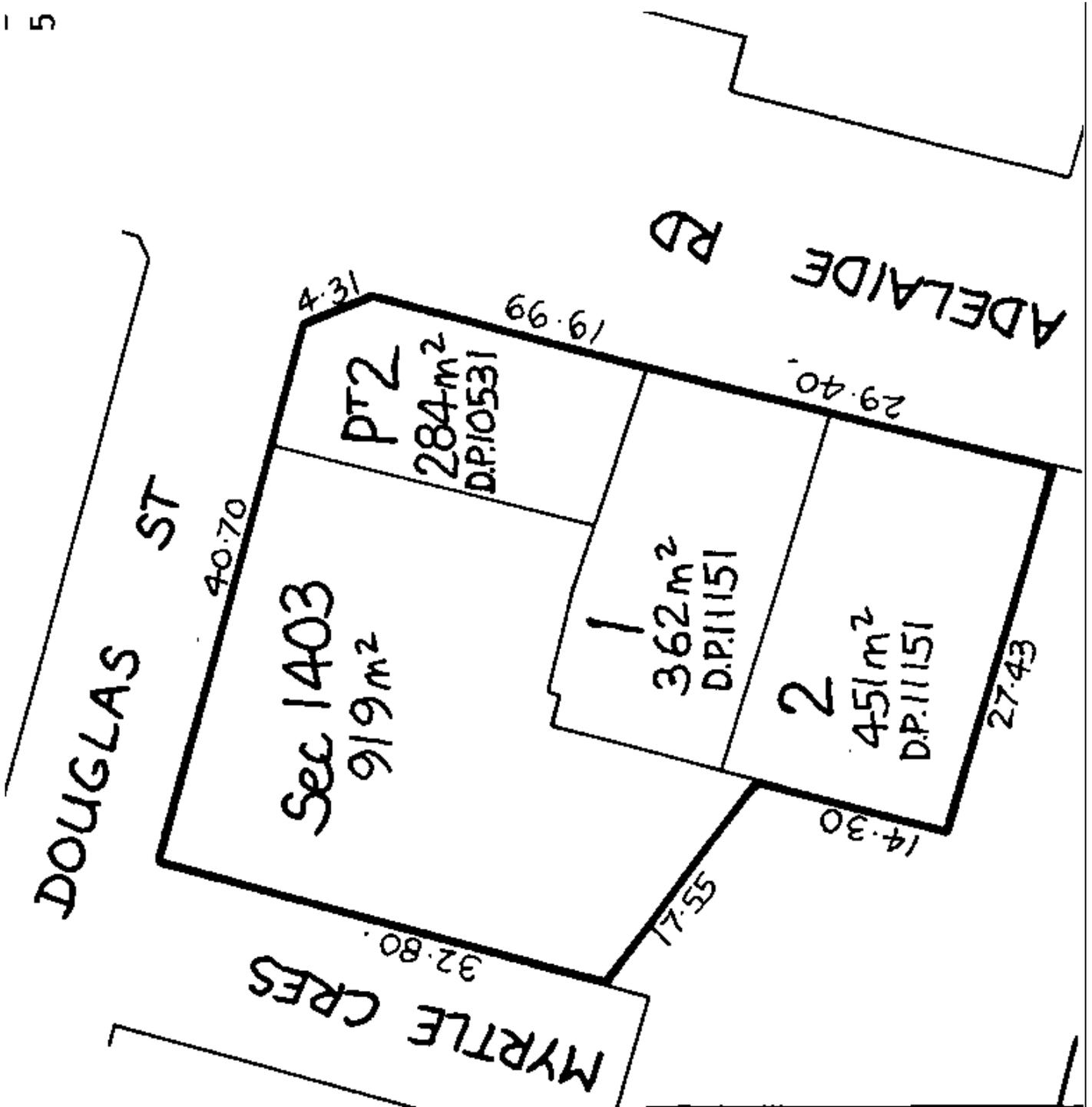
Registered Owners

Housing New Zealand Build Limited

Interests

Subject to Section 8 Mining Act 1971 (Affects Section 1403 SO 23605)

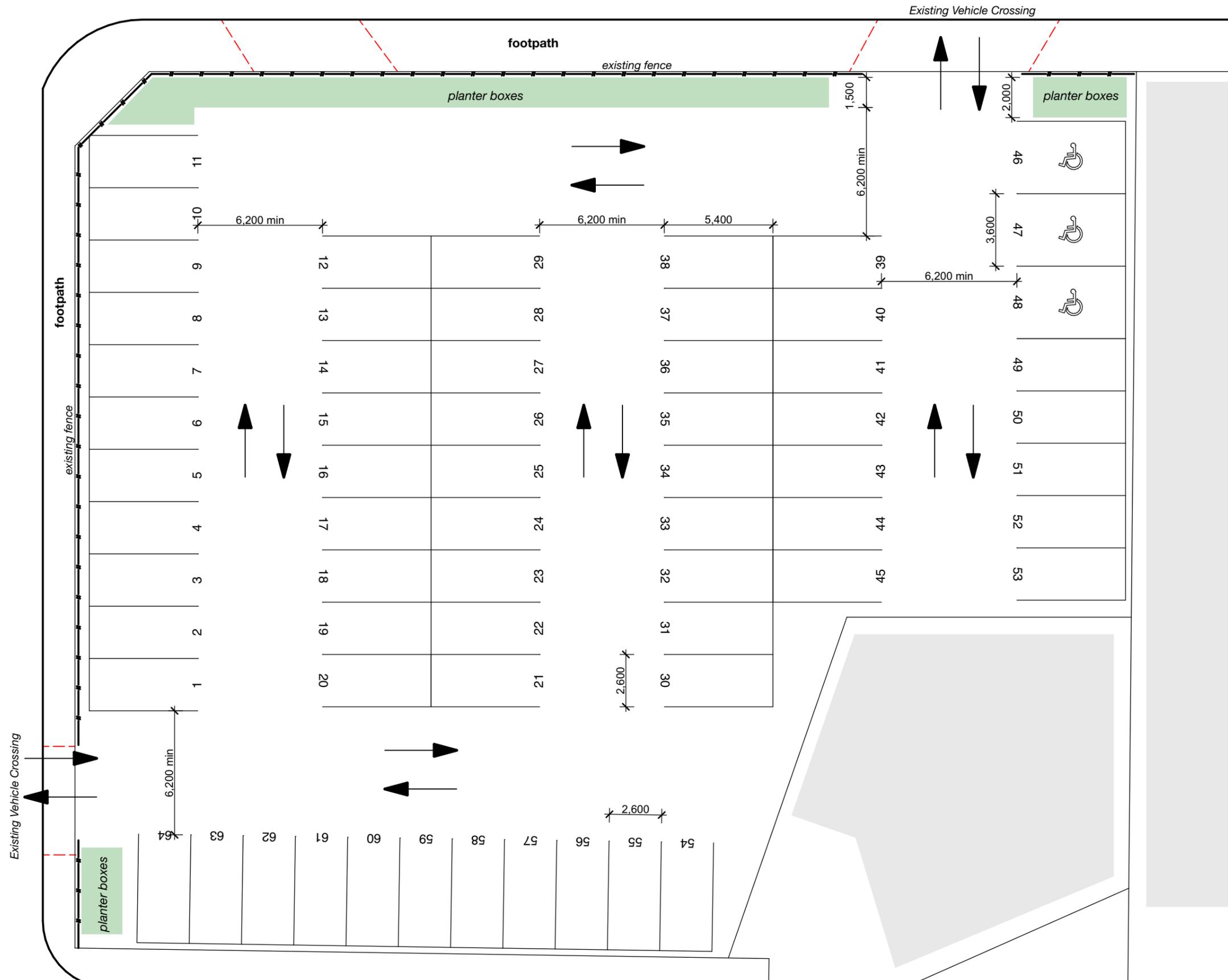
Subject to Section 5 Coal Mines Act 1979 (Affects Section 1403 SO 23605)



Appendix B: Site Plan

Adelaide Road

Douglas Street



Rev Date Issue

STUDIO

issue: **For Information**

project: **Wellington City Mission
Adelaide Road Car Parking**

address: 32 Adelaide Road, Mt Cook, Wellington

title: **Site Carpark**

date: 09/04/2025
scale: 1:200 @A3
dwg no: **W1319-005**

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