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**ORDINARY MEETING**

**OF**

**TRANSPORT AND URBAN DEVELOPMENT COMMITTEE**

**SEPARATELY ENCLOSED  
ATTACHMENTS**

**Time:** 9.15am  
**Date:** Thursday, 13 November 2014  
**Venue:** Committee Room 1  
Ground Floor, Council Offices  
101 Wakefield Street  
Wellington

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**Business**

**Page No.**

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**3. General Business**

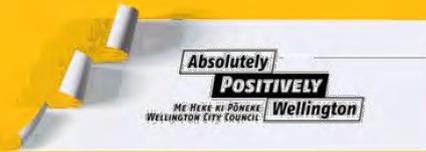
**3.1 Wellington Urban Growth Plan**

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**SUMMARY OF  
CONSULTATION ON  
THE DRAFT  
WELLINGTON URBAN  
GROWTH PLAN**

November 2014, City Planning and Design



**SUMMARY OF CONSULTATION**  
Draft Wellington Urban Growth Plan



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## **SUMMARY OF CONSULTATION**

### Draft Wellington Urban Growth Plan



### **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.

## SUMMARY OF CONSULTATION

Draft Wellington Urban Growth Plan



### 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.

## **SUMMARY OF CONSULTATION**

Draft Wellington Urban Growth Plan



### **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.

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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.

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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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### **Draft Wellington Urban Growth Plan**



- 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.

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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.

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



#### **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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Draft Wellington Urban Growth Plan



- 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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### Draft Wellington Urban Growth Plan



- 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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### **Draft Wellington Urban Growth Plan**



- 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;

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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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### **Draft Wellington Urban Growth Plan**



- 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;

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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.

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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:

## **SUMMARY OF CONSULTATION**

### **Draft Wellington Urban Growth Plan**



- 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.

**SUMMARY OF CONSULTATION**  
Draft Wellington Urban Growth Plan



- 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.

# Draft Wellington Urban Growth Plan 2014-2043

## Submissions

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Collation of all 89 submissions received during the  
consultation period, 16 September–17 October 2014

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13 October 2014

Freepost  
Wellington Urban Growth Plan (COP002)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

Dear Lucy

Wellington Urban Growth Plan 2014-2043

Please find attached the NZ Transport Agency's submission on the Wellington Urban Growth Plan.

We would welcome the opportunity to discuss the contents of our submission with Council officers. If you have any further questions, please do not hesitate to contact me on (04) 894-5236 or [angela.penfold@nzta.govt.nz](mailto:angela.penfold@nzta.govt.nz).

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Penfold', written over a light grey grid background.

Angela Penfold  
Senior Resource Planner

Encl.



**Submission on Wellington Urban Growth Plan**

**To:** Freepost  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CA82)  
PO Box 2199  
Wellington 6140

**From:** NZ Transport Agency  
PO Box 5084  
WELLINGTON 6145

**1 The NZ Transport Agency (Transport Agency) seeks amendments to the Wellington Urban Growth Plan.**

**1.1 General position**

The Transport Agency wishes to thank the Wellington City Council (WCC) for the opportunity to submit comments on the Wellington Urban Growth Plan 2014–2043. The Transport Agency generally supports the principles of the Wellington Urban Growth Plan (WUGP) to provide for planned urban growth in a sustainable manner.

However, our review of the WUGP has raised a number of transport related issues of concern to the Transport Agency. These are discussed in detail below. The Transport Agency would welcome opportunities to discuss these with Wellington City Council (WCC) in more detail.

**1.2 Transport Agency Outcomes**

Overall the Transport Agency is seeking to achieve outcomes in relation to:

- a. *An integrated transport network* for Wellington City across various transport modes and with land use. Generally the Transport Agency considers that the WUGP satisfies this outcome, though further improvements could be made by linking road upgrades with other forms of transport and making stronger connections between road upgrades and land use.
- b. *A regional approach* to the transport network. As Wellington City's transport network forms part of a regional transport network it is important strategic transport decisions for Wellington City take account of the impact on residents of other cities who work within Wellington City and therefore contribute to its wellbeing. 30% of workers within Wellington City come from other territorial authorities, contributing to traffic at peak times. The WUGP should be aligned with and support the outcomes sought through the Regional Land Transport Plan (currently being developed through the Regional Transport Committee and its supporting Technical Advisory Group).

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Wellington City Community Profile <http://profile.idnz.co.nz/wellington/workers?WebID=10>



- c. *Optimisation of activities* when considering interventions. This involves assessing a hierarchy of options starting with low cost alternatives (e.g. making best use of existing services and infrastructure, small infrastructure improvements) through to high-cost alternatives (e.g. large infrastructure investments). It also requires analysis of viable alternatives to maximise the contribution, for the funds used, towards achieving the Government Policy Statement on Land Transport and the Land Transport Management Act purpose and objectives.

### 1.3 Summary of key submission points

#### 1.3.1 The Transport Agency is seeking:

- 1) Better recognition of the role of the Roads of National Significance in maximising benefits across transport modes and upgrading pedestrian and cycle infrastructure;
- 2) Support for the WCC directing investment toward the growth spine and actions to help deliver a (bus) rapid transit spine through the city;
- 3) Desire to work closely with the Council as it develops its implementation strategy to ensure close alignment with the RLTP and optimisation of joint investment.

## 2 Background information

### 2.1 Role of the Transport Agency

The Transport Agency is a Crown entity that provides an integrated approach to transport planning, investment and delivery.

The Transport Agency's objective is to undertake its functions in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system.

It aims to create transport solutions for a thriving New Zealand and does this through four key functions, which are:

1. Planning the land transport networks (with partners)
2. Investing in land transport (with partners)
3. Managing the state highway network, and
4. Providing access to and use of the land transport system.

The WUCP directly effects how the Transport Agency will fulfil these functions to achieve its objectives in Wellington Region.

### 2.2 The land transport network in Wellington City

There are three components to the land transport network in Wellington City, being the public transport system, consisting of buses and trains, the local road network, managed by Wellington City Council and the State highway network, managed by the Transport Agency. The Transport Agency financially contributes to approximately 50-60% of the operation of



the public transport system and maintenance and operation of the local road network and 100% of the upgrades, maintenance and operation of the State highway network. The Transport Agency considers this investment critical to achieving many of the outcomes listed in the WUGP.

**3. The NZTA's submission is that:**

**3.1. A regionally focused transport system**

Wellington City is the employment and business hub of Wellington Region. It is important that the WUGP provides a regional view of Wellington's transport connections and users to ensure the provision of an integrated transport system that ably supports the central city. For example, Wellington has an important role in providing the strategic connection between the north and south islands, so the importance of port access for people and freight could be better recognised within the WUGP.

This approach is not sufficiently provided by the WUGP. Prioritising cyclists over public transport users is feasible for many Wellington City residents who do live within cycling distance of their employment, but many Wellington City residents are not within cycling distance and nor are residents of other territorial authorities. Wellington is a knowledge based economy and these commuters are key to the success of both the region and the city.

**3.2 Public Transport**

We support the WUGP's recognition of the important role that the public transport system plays in moving people around Wellington city. However, the Agency considers that greater weight could be given to this by listing implementation of bus priority and bus rapid transit measures along the growth spine as a key activity that will occur between now and 2043 (page 24).

The WUGP states "the public transport system is fully electrified and there is a significant number of private electric vehicles on the road" (page 24). This statement should recognise the intent of Greater Wellington Regional Council (GWRC) to move to a hybrid electric bus fleet in the short term. The Transport Agency notes that decisions on the type of public transport vehicle that is used on the Wellington city network will be made by GWRC in partnership with the Transport Agency as co-investor, but occurring in close dialogue with Wellington City Council. Collaboration between all three organisations will be continue to be critical to supporting successful operation of the Wellington transport system as a whole.

Mention of a "rapid transit spine" on page 40 of the WUGP should specifically refer to a "bus rapid transit spine". Note also, page 48 talk about bus stops but does not mention bus priority measures.

**3.3 The Roads of National Significance**

In 2008, Greater Wellington Regional Council (GWRC), WCC and the Transport Agency are all party to the Ngauranga to Airport Corridor Plan, which was informed by the Ngauranga to Airport Strategy Study and forms part of the Wellington Regional Land Transport Strategy 2010-40.



The Plan aims to strengthen the four key transport elements within the City, which are:

- A high quality and frequency passenger transport 'spine'
- Highly accessible and attractive 'activity' or shopping streets
- A reliable and accessible 'ring' or bypass route for vehicles, and
- Interconnected and convenient local street, walking, cycling and passenger transport networks.

One means of implementing this approach will be through a series of projects that comprise the urban Roads of National Significance (part of the Wellington Northern Corridor Roads of National Significance), and which are located within Wellington City, being:

- Ngauranga to Aotea Quay traffic management improvements
- Terrace Tunnel duplication
- Tunnel to Tunnel improvements, consisting of improvements to the Inner City Bypass, the Memorial Park Tunnel and the Basin Bridge
- Airport to Mt Victoria Tunnel, consisting of Mt Victoria Tunnel duplication, widening of Ruahine Street and Wellington Road and improvements to intersections along Cobham Drive

These projects are designed to maximise benefits for public transport, freight and private vehicles and will also upgrade pedestrian and cycle infrastructure. Implementation of these projects is critical for Wellington City to achieve the growth set out in the WUGP. However, the document does not adequately recognise the benefits of these projects or coherently incorporate them into action planning. While the Transport Agency is ultimately responsible for the planning and delivery of the urban RoNS, Wellington City Council is a key partner in these projects and it is important that the Roads of National Significance and Wellington's urban growth are comprehensively integrated.

For example, the Transport Agency considers that better recognition of the RoNS could be achieved through the following changes to the WUGP:

- referring to the resilience benefits of the RoNS on page 22 under discussion of the 'City resilience'
- stating "Through investment in the Wellington Northern Corridor RoNS, Wellington is relatively well-placed to face the transport challenges of the next 50 years, (on page 24).
- Refer to the Wellington Northern Corridor RoNS first before discussing the Wellington City specific RoNS, in recognition of the important role these have for the strategic road network and moving people and freight, nationally, regionally, as well as within Wellington city.



#### **3.4 Specific development areas not commented on**

Several development areas are proposed in the WUGP. It is noted that generally the areas proposed for more intense development are around shopping and transport nodes, which shows good integration of land use with transport.

This submission does not comment specifically on any of those areas. Instead, the Transport Agency will comment on District Plan changes once they are notified with a suitable level of detail. When assessing specific development areas, the Transport Agency will consider whether additional impacts on the transport network will require mitigation, and whether financial contributions towards specific projects are required.

In some cases, additional transport infrastructure will be required to support the growth. The Transport Agency is happy to work with WCC to ensure the timing of these transport projects lines up with development.

#### **3.5 Investment focus**

The WUGP contains a large number of transport related actions, clearly demonstrating the pivotal role that transport plays in supporting Wellington's growth.

Where central government investment is required to achieve the transport actions, projects will be subject to national prioritisation pursuant to the National Land Transport Programme.

The Transport Agency is only able to invest in transport related outcomes. Benefits that relate solely to other outcomes, such as urban design, will not attract investment via the National Land Transport Programme. A business case approach is used to guide investment processes (as well as planning and project development processes). This is a principles-based approach that links our strategy to outcomes, and defines problems and their consequences prior to looking for solutions. This approach ensures a shared view of problems and benefits early in the transport planning process.

#### **3.6 Timing of actions**

The WUGP does not include timeframes for activities or indicate which activities will be prioritised and/or progress first. Instead it notes that a detailed implementation strategy will be developed to support the Plan, identifying priority investments over 1-3 years, and 4-10 years. The Transport Agency would like to work with the Council as it develops the strategy and priorities activities, particularly where the activities may be included in the Regional Land Transport Plan 2015-21 or are complementary to such activities.

#### **3.7 Development supported by existing/planned transport**

The Transport Agency is pleased to see that development along the growth spine and in the Greenfield growth areas will occur where it is supported by existing or planned transport (page 7 – 'Our Compact City').



The Transport Agency supports the provision of medium density housing in and around key centres. The Transport Agency is intending to jointly invest with GWRC in better public transport connections to many of these centres through a variety of measures. Aspects of the Roads of National Significance Programme will also aid connections to these centres.

In relation to providing choice along transport routes the Transport Agency is supportive of walking and cycling initiatives and is currently working with others to develop an investment framework for the \$100 million additional cycling investment announced by the Government earlier this year.

In addition, draft investment guidance for the National Land Transport Programme signals that a more permissive approach will be taken to walking and cycling projects to accelerate uptake of these modes.

### 3.8 Resilience

The Transport Agency is pleased that earthquake strengthening of buildings along key transport routes is a priority (page 8). This supports ongoing investments in State highway and local road network resilience. The prioritising, programming and progressing of local roading resilience work is considered a critical workstream to progress in the short to medium term.

### 3.9 Development in the coastal environment

The tests for development and activities in the coastal environment set by the WUGP are higher than those listed in the National Coastal Policy Statement, which lists exemptions for activities such as regionally beneficial reclamation. For example, the WUGP coastal tests could impact the provision of the Great Harbour Way, which is a key component of the WUGP. The Transport Agency seeks alignment of the WUGP with the National Coastal Policy Statement and the Draft Regional Plan.

### 3.10 Housing

The Transport Agency supports the expectations of the WUGP for 25% of new housing to be low density, 35% medium density and 40% high density and the WUGP's intent for most of this growth to occur in the central city and along the growth spine supporting optimisation of investment along the growth spine. (page 17).

The Transport Agency is supporting residential development by investing in transport network upgrades for a variety of modes.

### 3.11 Transport & Movement

This section notes that currently 34 percent of journeys by residents into the central city on weekdays are by bus and 6 percent are by train.

30% of Wellington's employees come from outside city boundaries – these people are major users of the urban transport system and their mode choices should be recognised so that any changes can take account of them.



There is a discrepancy between the above statement and the diagram on page 25, which is probably caused by different geographic samples, but the information is not available in the WGUP to confirm this.

### 3.12 Economy and Employment

The statements on page 26 about the high quality transport links providing a competitive advantage for Wellington should be stated within the Transport & Movement section as well.

### 3.13 The Big 8 – Idea 6: Better transport

The importance of Idea 6 of The Big 8 should be reiterated in this section.

### 3.14 The road network

The plan by 2043 should include expectations for the road network. This is a critical component of cycling, pedestrian and public transport and freight networks. To provide a holistic, integrated transport system all aspects of it must be recognised and planned for, including safety. An example could be:

The road network provides sufficient capacity for a range of modes, reflecting their importance in the transport system hierarchy, and prioritises different users at different times to maximise capacity. The road network also implements the safe system approach to minimise the potential for death or a serious injury if a road user makes a mistake.

### 3.15 Other elements of the transport system

To provide a holistic integrated plan of the 2043 transport system, all elements should be included. However, freight, rail, the airport and Centreport are not included, resulting in an incomplete forecast of the transport system. It also leaves a gap in stakeholder understanding of customer expectations.

### 3.16 Transport diagrams (p25)

A five year period is insufficient to allow meaningful analysis of the information. The period under consideration includes a global recession, making the data unreliable. Forward predictions should take into account the Greater Wellington TN24 Baseline Forecasting Report.

### 3.17 Economy and Employment

To provide better linkages and legibility of Council documents it is suggested that this section should also set out how other plans/projects/actions within the WGUP will contribute to the Big 8. For example, the following ideas will all be directly facilitated by some aspect of the WGUP:

- Idea 1: Film museum
- Idea 2: International air connections



- Idea 5: A Miramar framework
- Idea 6: Better transport
- Idea 8: Liveable city

### 3.18 Summary Plan (p31)

The Roads of National Significance programme should be labelled as facilitating Adelaide Road, Kilbirnie and Miramar growth areas. They also facilitate the public transport spine, which is shown on this plan.

### 3.19 Transformational Growth Areas (p32)

The benefits of the growth spine approach are noted and supported, although the description has limited usefulness. For example, is Karori between Johnsonville and the airport? And it is noted that Miramar is proposed elsewhere in the document as an area suitable for intensification.

### 3.20 Stimulate development in sub-regional areas (p36)

The Transport Agency is a partner with WCC for the Johnsonville Triangle Improvements project, which has already commenced and is necessary to the regeneration.

The attractiveness of Kilbirnie to developers will be enhanced by completion of the Basin Bridge, Mt Victoria duplication and Ruahine Street/Wellington Road widening projects, as well as implementation of Bus Rapid Transit.

### 3.21 Support the development of greenfield areas in the northern suburbs (p36)

It is unclear where the 'eco-town' would be located. If it is within Lincolnshire Farms, then the Transport Agency would appreciate early conversations to ensure the effect of integration of the Link Road and the eco-town are well understood and can be managed.

The project should also include an action to ensure management of transport demand by providing mixed use development, schools and other community facilities and access to public transport to ensure that pressure on the existing arterial network (including the State highway network) is not exacerbated.

### 3.22 Airport Precinct (p37)

The Transport Agency intends to improve transport connections to and from the airport via the Roads of National Significance programme as well as implementation of bus rapid transit.

These improvements are generally consistent with the Ngauranga to Airport Corridor Plan.



### 3.23 Develop new action plans for other centres (p41)

The Transport Agency is generally supportive of development around suburban centres that are well provided with local services and public transport. We look forward to reviewing the proposed plan changes for Miramar, Tawa and Karori.

### 3.24 Real Transport Choices (p42)

The Transport Agency is pleased to see a clear transport hierarchy for the WUGP. However, several questions arose that the Transport Agency considers are worth further discussion:

- How would the hierarchy be implemented (and road space allocated) in situations like Adelaide Road where the Transport Agency and GWRC are intending to invest in public transport improvements, but there are competing demands from pedestrians and cyclists who have higher priority?
- Do the projects/actions associated with pedestrians on page 47 reflect pedestrians' position in the hierarchy? Compare to the actions for cyclists, which are much more detailed and delivery orientated.
- Does the hierarchy reflect the fact that cars are not just a necessary option for some people, but for some suburbs?
- How will the hierarchy interact with Network Operating Plans, which prioritise different users on different parts of the network at different times of the day?

### 3.25 Transport in Wellington (p43)

A new title such as 'Key Transport Improvements' may be more meaningful.

'Terrace and Mt Victoria Tunnel Improvements' should be replaced with 'Terrace Tunnel duplication, Inner City Bypass Improvements, Basin Bridge and Mt Victoria Tunnel duplication.'

### 3.26 Priority Improvements (p44)

The action list includes several cycling projects that WCC is keen to progress and intends to work with the Transport Agency to invest in several of them. The Transport Agency's preference is to be involved in the planning of all activities to ensure that maximum land transport fund investment for these projects can be achieved.

### 3.27 Improve pedestrian accessibility and safety

The pedestrian actions outlined on page 47 do not adequately provide for any increase in level of service from an efficiency viewpoint, however the City's Jan Gehl report indicates several areas where the level of service is lacking.

In addition, the Transport Agency encourages WCC to make further inroads into understanding pedestrian slips, trips and falls as an indicator of defects in the network and a safety project worthy of inclusion.



WCC is encouraged to liaise with the Transport Agency regarding this work to ensure that investment in this area is maximised.

### 3.28 Improve the road network

Improve the road network to reduce the intrusion of through-traffic in the city network we need to plan routes that better facilitate the movement of vehicles from the north of Wellington around the edge of the central city through to the end of the State highway at Wellington Airport.

It would be useful for the project to 'improve the road network' (page 50) to include more focus on implementation rather than planning. Much of the planning work to achieve the above outcome has already been completed under the Ngauranga to Airport Corridor Plan, which was informed by the Ngauranga to Airport Strategy Study and forms part of the Wellington Regional Land Transport Strategy 2010-40.

The Transport Agency is implementing the work with by delivering the Roads of National Significance. WCC is a key stakeholder in this work.

The identified review of road space action is essential if the benefits of strategic cycle lanes and bus rapid transit are to be realised.

The network operating framework action should include development of priorities as well as principles. This work needs to be undertaken in partnership with GW and the Transport Agency to ensure that both time and space on the network are suitably allocated, enabling maximum efficiencies across the modes.

### 3.29 Manage parking more efficiently

The Transport Agency is highly supportive of WCC undertaking a review of its on-street parking strategy as on-street parking directly impacts on the ability to provide for other modes such as cycling or public transport within the road corridor (page 51). The Transport Agency encourages the Council to think holistically about parking, and consider the controls around the provision of private car park buildings as part of this review.

Finally, any removal of commuter parking will have implications for modal share across the regional transport system and it will be important that the impacts are well understood and can be managed. Hence it is recommended that the project to examine levers for private parking includes scope to assess the impacts on regional modal share.



4. The NZTA does wish to be heard in support of this submission.

Dated at Wellington this 13th day of October 2014.

A handwritten signature in blue ink, appearing to read 'L Hammond', written over a horizontal line.

Lyndon Hammond  
Regional Manager - Planning and Investment  
*Pursuant to a delegation from the Chief Executive of the New Zealand Transport Agency.*

Address for service:	Angela Penfold NZ Transport Agency P O Box 5084 WELLINGTON 6145
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13 October 2014

Wellington Urban Growth Plan (COP002)  
Wellington City Council  
PO Box 2199  
WELLINGTON 6140

**Wellington Urban Growth Plan - Feedback**

Thank you for the opportunity to provide feedback to the draft Wellington Urban Growth Plan.

Housing New Zealand has reviewed the document and on the whole, Housing New Zealand considers that content and matters of the Plan addresses are generally appropriate. Housing New Zealand notes that the layout is simple to follow and the information is provided in a concise manner.

Below are observations that are of specific interest to matters of importance to Housing New Zealand and the organisation believes should be reviewed by the Council in further detail as part of the consultation process and prior to adopting the Plan:

- a) Housing New Zealand considers that the actions specifically outlined to encourage development of housing in the city do not necessarily provide sufficient certainty of outcome or process to be sufficiently encouraging for any developer (including Housing New Zealand) to provide for, and develop the range and variety of housing in the city that is been sought by the Plan;
- b) The approach towards medium density and greenfield housing opportunities in the Plan is commendable, however we believe that there is further scope to encourage higher density housing than is currently provided for in the Plan. Housing New Zealand believes that there should be more opportunities available for higher density and to showcase higher density housing that display good urban design without compromising the quality and quantity of good housing that the city wants to portray;
- c) Housing New Zealand believe that the use of the Special Housing Areas (SHA) as a means of encouraging housing in the city is commendable but as the Plan is intended to provide direction for growth over the next 30 years this action is only short term (between 2-4 years as the intention of the legislation was). We believe that there should be more long term actions that address the entire 30 year period;
- d) Housing New Zealand is concerned that the use of SHAs as the sole tool for initiating housing supply is short lived and that the Council should instead be concentrating on progressing more changes to the wider planning framework including the objectives, policies and rules of the District Plan to provide a suite of controls that enable the development of a wider range of housing typologies and create opportunities and variety for housing developers and providers.

e) Finally, Housing New Zealand notes that although there is a monitoring and review function outlined in the Plan, we suggest that reviews should be undertaken annually or two yearly so that the Plan is always current and a living, implemented document.

We are happy to discuss our feedback with the Council if there is need for clarification or if there are any questions concerning the feedback provided, please do not hesitate to contact us below.

Yours sincerely



Patrick Dougherty  
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Housing New Zealand Corporation

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13 October 2014

File Ref: X/26/02/194

Wellington Urban Growth Plan (COP002)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

For: Lucy Desrosiers

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Dear Lucy

**Feedback on the draft Wellington Urban Growth Plan 2014-2034**

Please find enclosed the Greater Wellington Regional Council's feedback on the draft Wellington Urban Growth Plan 2014-2034.

Please feel free to contact me on 04 830 4034 or [caroline.ammundsen@gw.govt.nz](mailto:caroline.ammundsen@gw.govt.nz) if you have any questions or concerns.

Yours sincerely

Caroline Ammundsen  
Policy Advisor, Environmental Policy

Encl: Feedback



**Greater Wellington Regional Council: Feedback**

To:	Wellington City Council
Feedback on:	Draft Wellington Urban Growth Plan 2014-2043

**1. Introduction**

1.1. Thank you for the opportunity to provide feedback on the draft Wellington Urban Growth Plan (the Growth Plan) 2014-2043. GWRC supports the overall policy direction proposed in the Growth Plan. GWRC recognises that this Growth Plan is a high level planning document and that it is proposing a spatial pattern for future growth and development in Wellington city. While this Growth Plan is not required to give effect to the Regional Policy Statement for the Wellington Region (RPS), its implementation will be partly reliant on changes to the Wellington City District Plan which must give effect to the policy direction in the RPS. It is therefore important that this Growth Plan is largely consistent with the RPS.

1.2. We also note that development within areas identified for urban growth will likely require resource consent from GWRC under the regional plan. GWRC is currently reviewing its regional plans and released the draft Natural Resources Plan for the Wellington region (the draft Plan) on 22 September 2014 for consultation. A proposed Natural Resources Plan is likely to be released in mid-2015.

1.3. This feedback is ordered according to the various sections in the Growth Plan to be user friendly.

**Executive summary and Introduction (Pages 6-11)**

1.4. GWRC supports the key outcomes that the Growth Plan seeks to deliver, including "Development along the growth spine", which includes more intensive residential and commercial development along the growth spine. This key outcome is consistent with RPS Policy 31 that promotes higher density and mixed use development in around key centres and along the strategic public transport network.

1.5. GWRC supports other key outcomes including "Transport routes that provide choice", and "Resilient city" which are consistent with regional transport outcomes. Having a "dynamic central city" and "attractive suburban centres" are also consistent with RPS Policy 30 which seeks the maintenance and enhancement of the viability and vibrancy of the regional central business district in Wellington and other sub-regional and suburban centres. This is further emphasised in the Growth Plan by the statement "the central area will continue to further develop as the cultural, economic and social hub for the

Wellington region suburban centres will provide a focus for community life ...” This is supported by GWRC.

- 1.6 GWRC supports the implicit way in which environmental impacts and considerations have been integrated in the Growth Plan’s objectives and key strategic outcomes.

**Where does the Wellington Urban Growth Plan fit? (Page 12)**

- 1.7 GWRC suggests that the Porirua Harbour and Catchment Strategy and Action Plan 2012 should also be referenced.

**Natural environment and sustainability (Page 19)**

- 1.8 GWRC supports the Growth Plan’s intention to invest in the natural environment and parks to keep pace with population growth, urban intensification and greenfield development. We also support the minimisation of the environmental impacts of urban development and transport which is implicit in the RPS. For example, RPS Policy 41 requires the minimisation of the effects from earthworks and vegetation clearance. Outcomes that promote subdivisions that incorporate sustainable, low-impact urban development principles is also supported by RPS Policy 42 which promotes the use of water sensitive design techniques such as swales, wetland treatment and stormwater attenuation devices to reduce the adverse effects of stormwater runoff.

- 1.9 GWRC supports the actions to review design guides and Wellington City District Plan provisions to ensure that both greenfield and medium-density development is of high quality. This will provide a good opportunity to ensure that best practice is integrated to manage environmental effects at all stages of planning.

**Transport and movement (Page 24)**

- 1.10 GWRC generally agrees with the current state of “transport movement” and future direction described in the Growth Plan. We support the bullet points outlining what is planned to happen with our transport network by 2043. However, GWRC is aiming to provide an increasingly energy efficient and low emissions transport fleet, and this will be via a transitional fleet replacement process and will depend upon the technology available over time.

- 1.11 GWRC suggest that bullet point 8 be slightly amended to better reflect possible future scenarios of transport electrification:

*“The public transport system may be fully electrified or may comprise wholly or partly of another new technology or fuel source, depending on what is available, affordable and best achieves the low emission, energy efficient objective, and there is a significant number of private electric vehicles of the road.”*

**Infrastructure (Page 26)**

I.12: GWRC supports the discussion around supporting high-quality, reliable infrastructure for economic, social, environmental and cultural wellbeing. Policy 7 in the RPS recognises the importance of regionally significant infrastructure and Policy 8 seeks the protection of it from incompatible new subdivision, use and development. The city's projected growth means that new infrastructure will be required as well as upgrades to existing infrastructure. The RPS promotes the use of new technology such as water sensitive urban design techniques to reduce the adverse effects of stormwater runoff from new subdivision and development in Policy 42. These approaches are aimed at producing hydraulic neutrality and good aquatic ecosystem health.

I.13: GWRC suggested adding into the second bullet point:

*...and new housing development including investment in new approaches to stormwater design and treatment... (especially along the growth spine...)*

#### **Historic heritage and character (Page 28)**

I.14: GWRC supports the message in the Growth Plan about the protection of historic heritage. However, we suggest that clarification is provided on how the protection of historic heritage is being implemented through the rest of the Growth Plan.

I.15: It is noted that the map on Page 33 identifies a "growth precinct" in the central area. It is difficult to see where this area is as street names haven't been included. GWRC suggests that the maps in the Growth Plan incorporate street names to make them clearer. GWRC is uncertain as whether this area covers Cuba St and suggests that due to the significant historic heritage value in Cuba St, further intensification will need to be sensitive to this.

I.16: The map on Page 54 shows the "central city growth areas" as including Thorndon and Te Aro and Newtown as a "Southern growth corridor". Again there is a high concentration of historic heritage buildings and areas within these parts of Wellington city, so intensive development will have to consider the heritage values of these areas.

I.17: GWRC suggests adding to the second bullet point:

*The legacy of the past is recognised through the appropriate identification, protection, conservation and use of...*

#### **3.0 Our Action Plan (Page 30)**

I.18: GWRC supports the overall approach of the Growth Plan to build upon the concept of the "growth spine" as the city's key development, transport and investment corridor. From a strategic transport perspective, this enables more people to live closer to where they work, shop and access local facilities. It also supports a more efficient transport system and enables access to more transport choice. The Wellington region's Ngauranga to Wellington Airport Corridor Plan (N2A) sets out transport improvements to support the growth spine concept through Wellington city.

**Transformational growth areas (Page 36)**

- 1.19 GWRC supports the project to “deliver the vision for Adelaide Road” which is consistent with the N2A Corridor Plan and will be supported by the proposed route of the future public transport spine through to Wellington Hospital. We also support the projects to “stimulate development in sub-regional centres” such as Kilbirnie and Johnsonville as these areas are important public transport hubs, offering good transport choices. This is also consistent with Policy 30 in the RPS.
- 1.20 GWRC supports the action “Plan for the development of lower and upper Stebbings Valley”. We support the Growth Plan’s recognition of the need to protect waterways and significant indigenous vegetation when developing Stebbings Valley, where development has the potential to impact on biodiversity values.
- 1.21 GWRC welcomes any opportunity to work together with WCC officers at the front end of the planning process for greenfield or medium-density development. Dealing with issues of relevance to GWRC during the structure planning/zoning phase of development could provide greater certainty to developers. It could also help to reduce perceived duplication of process and delays.

**Support the development of the port and the airport as economic hubs (Page 37)**

- 1.22 GWRC supports the “Port Precinct Plan” that seeks to improve access to the Port as a regionally important issue, particularly from a freight and resilience perspective. Current access issues in the Port Precinct need to be resolved to support future port and economic growth and recovery following a major earthquake or other hazard event.

**Deliver improvements in the central city and key centres (Page 39)**

- 1.23 GWRC supports the action to deliver improvements to Victoria Street, which include upgrades to bus and cycle lanes. GWRC wish to be engaged early in the detailed design of this project which we note has had further information about what the project involves on the Wellington City Council website. Early engagement with GWRC is also sought for the Taranaki Street and Kent and Cambridge Terrace improvement plans, as these are also key public transport routes.

**Real transport choices (Page 42)**

- 1.24 GWRC supports the overall direction for the transport network described in the introduction to this section including: priority for walking, cycling and public transport; ensuring good transport choices; reducing car dependency; delivering the bus rapid transit network; and the recognising the important role of the Port.
- 1.25 GWRC supports the inclusion of a “transport system hierarchy” which recognises in priority order pedestrians, cyclists, public transport, moving

freight and private vehicles. An overall transport hierarchy can be useful to signal priorities, however, a balanced and optimised transport network will involve different mode priorities for different routes and at different times of the day and week.

**Make Wellington a better city for cycling (Page 44)**

I.26: GWRC supports the project to "increase the uptake of cycling", which is consistent with the regional outcomes for cycling in the Regional Land Transport Strategy (2010-2040), which has increased cycling as a key outcome. We support the various action areas under this project which are generally consistent with the Regional Cycling Plan 2008.

I.27: GWRC notes that the action "Give cyclists priority on key routes" appears from its description to be mainly about providing cycling parking.

I.28: GWRC suggests the title is amended to:

*"Give cyclists priority on key routes Provide more cycle facilities in key centres"*

I.29: Priority for cyclists on key routes looks to be addressed under the previous action "Priority improvements"

I.30: GWRC supports the projects under "increase recreational cycling opportunities" as these are considered to support an uptake in cycling for transport/trips.

**Improve pedestrian accessibility and safety (Page 47)**

I.31: GWRC supports the projects and actions under this section "improve pedestrian accessibility and safety" which are seeking to improve the safety and level of service for pedestrians, consistent with the regional outcomes for walking in the Regional Walking Plan 2008 which has increased walking a key outcome along with increased level of safety.

I.32: GWRC supports the proposed focus on improvements that will have the greatest benefits such as on key routes to public transport stops/stations, schools, and the central city.

**Encourage more public transport use (Page 48)**

I.33: GWRC suggests an amendment to the first Project title:

*"Support the Advocate for improved provision, reliability and affordability of public transport to encourage more people to use it"*

I.34: This will better reflect Wellington City Council's (WCC) important role in delivering the infrastructure (such as bus priority measures) for public transport.

1.35 GWRC notes there is reference in the Growth Plan to "bus rapid transit", "the PT spine" and "rapid transit spine" that is not always consistent or accurate. GWRC suggests some changes (below) to the map on Page 43 and to the text under the first action to reflect this:

1.36 For the Map on Page 43, GWRC recommends that the public transport elements be changed on this map to show:

- The public transport priority spine (from Wellington Railway Station to the Regional Hospital, Newtown and to Kilbirnie) along which priority measures and high quality infrastructure will be applied as a top priority to facilitate the wider bus rapid transit system.
- Wider bus priority treatment (we suggest this reflects the Metlink core bus network as set out on Page 46 of the Wellington Regional Public Transport Plan 2014 (RPTP)) as these are the core routes that will facilitate the bus rapid transit network concept extending to suburban centres.

[Note: While bus services will run to Wellington International Airport using the wider bus rapid transit network, the part of the route along Calabar Road from Cobham Drive to the Airport is not identified as a core bus route under the RPTP and is not likely to require any priority treatment due to a lack of any real congestion issues here].

1.37 GWRC suggests that amendments are made to the first bullet point "Help deliver a rapid transit spine through the city" to more strongly express the critical role of WCC to enable the wider bus rapid transit system through the reallocation of road space and implementation of priority measures. GWRC suggests amending this to read:

*"Facilitate the Help-delivery of the bus rapid transit network spine through the city."*

1.38 GWRC also suggests the following amended description for this action:

*Work in partnership with GWRC and the NZTA to implement the bus rapid transit network by designing and constructing priority measures and infrastructure along the preferred public transport priority spine (Wellington Railway Station to Newtown and Kilbirnie) corridors and services. When designing the public transport priority spine, key considerations will be ensuring integration with the wider public transport network and other transport modes, including pedestrians and cyclists, and identifying any opportunities for transit oriented development along the spine.*

The agreed spine routes will run from Johnsonville to Island Bay and Karori and to Miramar and Seatoun through the city using the Golden Mile. This will integrate the public transport spine with the rest of the public transport network and other transport options, servicing the central city, our key centres and our suburban areas. Where the rapid transit network is to be developed, identify

appropriate streetscape improvements that integrate all transport modes and prioritise the needs of pedestrians.

Identify sites with potential on this main transport route to better integrate bus stops with other street activity, and achieve development outcomes. Integrate the delivery of public transport priority with cycleways sharing the same corridor in some locations.

I.39. In relation to the third action "Advocate to improve the overall energy efficiency of the bus network" and reference to a "fully electric service as soon as possible" see our comments on "Transport and movement" (Growth Plan Page 24) above.

I.40. In relation to the action "Investigate the development potential of the bus terminus", GWRC supports the investigation of improvements but request that this includes working closely with GWRC to ensure that bus operational requirements are well understood and provided for.

I.41. GWRC suggests amending the action to:

*"Consider whether the arrangement of the city's main bus terminus area and railway station in the Parliamentary area could be improved, including cycle connections, in conjunction with GWRC. Improve pedestrian connections from the station and bus terminus into the central city."*

**Improve the road network (Page 50)**

I.42. GWRC supports the project titled "improve the road network" and agrees that an efficient and effective ring route that provides for movement of vehicles around the edge of the central city will provide a reliable route for cross city trips, including freight.

I.43. The three actions under this project are consistent with regional transport issues and responses identified through the Regional Land Transport Strategy 2010-2040, programme and corridor plans.

I.44. GWRC supports the project titled "review road space allocation", including actions to develop a network operating framework and review of the road hierarchy map. Being clear about the priorities on different parts of the network will assist decision makers when trade-offs must be made in the allocation of limited road space.

I.45. GWRC suggests another action should be included under the "review road space allocation" project:

*Priority measures for public transport - design and implementation of priority measures for public transport following the review of road space allocation, to support a future bus rapid transit system.*

- I.46 GWRC supports the project titled "car share scheme" as this is a demand management measure with good potential benefits that is identified and supported in the Regional Travel Demand Management Plan 2009.

**Manage parking more efficiently (Page 51)**

- I.47 GWRC supports the project titled "Review and update the Council's parking policy". The actions under this heading are consistent with the need to understand and be clear about the priorities for allocation of road space.

- I.48 GWRC supports the project titled "Examine levers for private parking". We suggest that the investigation of pricing options (eg. parking levy) be part of this proposed work. Analysis using the Wellington Transport Strategic Model to look at future scenarios found that parking management tools could have a significant impact on public transport mode share and congestion outcomes for the region's transport network. GWRC notes that a joint parking study is planned between WCC and GWRC to investigate commuter/long stay parking as a demand management measure, and this will feed into this project area.

- I.49 GWRC supports improving options for people to park to use public transport, as this extends the reach and accessibility of the public transport network.

**Natural Environment (page 58)**

- I.50 GWRC supports the programme identified in the Growth Plan to "improve Grenada North Park", particularly as it links into Belmont Regional Park. GWRC notes that we have recently signed an agreement with WCC to manage WCC land adjacent to Grenada North Park as part of Belmont Regional Park. As there is a track leading into Belmont Regional Park from the Grenada North Park, it will be important to consider the likely increase in use or interest in accessing Belmont Regional Park from this location.

**Reduce the environmental impacts of urban development and transport (Page 60)**

- I.51 GWRC supports the actions listed under the "plan for water catchments as we grow" project which will be useful for managing the adverse impacts on waterways.

- I.52 GWRC also suggest a slight amendment to the project "advocate for low-carbon solutions".

***...sectors when considering the reduction of carbon and transport-related air pollutants (including particulate emissions)***

- I.53 GWRC also suggests a consideration to adopt road set-back distances for new sensitive land use activities, such as early childhood centres, schools and hospitals to minimise exposure to transport-related air pollutants.

**City Resilience (Page 61)**

1.54. GWRC supports the project titled "Secure and protect key resilient infrastructure". Working with other agencies to protect key lifelines and improve the resilience of key infrastructure is particularly important in relation to the regional transport network.

**2. Further involvement**

GWRC recommends that the points as outlined above be considered in the finalisation of the draft Growth Plan. We would also welcome the opportunity to clarify and further discuss the matters raised.



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## Submission on the Draft Wellington Urban Growth Plan

To: Wellington City Council (the Council)  
From: Property Council New Zealand (Property Council)

PROPERTY COUNCIL (at the address for service given below) makes the following submission on the funding options:

### About Property Council

1. Property Council is a not-for-profit organisation representing the country's commercial, industrial, retail, listed and unlisted property funds, local government, not for profit organisations and multi-unit residential property owners, managers and investors – including thousands of New Zealanders with retirement savings in listed property entities, unlisted funds and KiwiSaver.
2. Our close to 700 member companies have billions of dollars invested in commercial property. They range from leading institutional investors, listed and unlisted property entities and financial organisations to private investors and developers. A significant proportion of their investments is in Wellington.
3. As building owners, developers, consumers, taxpayers and ratepayers, Property Council's members want to live and work in a built environment which is economically viable, sustainable, vibrant, and a desirable place to be. A vibrant and prosperous built environment, which evolves through better urban design, will attract more economic activity and investment (domestic and foreign), which in turn improves financial returns.
4. Property Council's public policy interests fall into three primary areas of analysis: urban strategy and infrastructure; compliance and legislation; and capital markets. Property Council supports the implementation of statutory and regulatory frameworks that enhance (and do not inhibit) productivity-driven economic growth and prosperity. Property Council is also a proponent of urban sustainability and heritage outcomes, which are realised through the active governance and management of the urban environment.

### Matters for Consideration

5. In order to be effective, the Wellington Urban Growth Plan (the Plan) must enable the city to achieve greater efficiencies and enjoy prosperity.
6. Property Council notes the Plan would be an overarching document which will determine the Council's future direction, particularly in regards to its Long Term Plan, and help achieve the city's long-term vision.



7. We note the Plan will replace the city's existing urban development and transport strategies. We also note the Plan would seek to preserve the city's character, keep it compact and connected to nature, and ensure we have an efficient, sustainable and accessible transport network.
8. Property Council cautiously supports the draft Plan and appreciates the Council's intention to help ensure the use of our limited resources is optimised and that future developed is well-directed and sustainable. We note the Plan will guide the Council in directing investment and supporting development in growth areas. Nonetheless, we caution the Council to ensure the directives set do not become overly prescriptive so as to become a disincentive to investment, growth and economic development.
9. The challenge, we believe, will be accomplishing the good intentions of the Plan.
10. The Plan will need to be conducive to investment and one that ensures the best possible outcome for the city and its people.

#### Transport

11. The economic and social benefits of the Wellington Northern Corridor Improvements – during construction and upon completion – are profound and well-documented. The Wellington region has waited more than 50 years for a better connection north and Property Council wishes to place on record its support for the programme.
12. Works on the Kapiti Expressway (MacKays to Peka Peka route and the Peka Peka to Otaki Expressway) are well underway and the Transmission Gully was recently commissioned.
13. Nevertheless, we feel it important to state that the full potential of these projects would not be realised as a result of the *bottleneck* around Ngauranga Gorge at peak times. For this reason, it is crucial that the Ngauranga to Aotea Quay and the Petone to Grenada link projects are prioritised. The Council can play an active part by advocating strongly with Central Government in this regard.
14. The Seaview/Gracefield area – and to a lesser extent other areas of the Hutt Valley – is Wellington's primary industrial location. The Petone to Grenada link will allow heavy trucks, distribution vehicles and employees to join and exit Transmission Gully in free-flowing traffic. It will remove the majority of heavy vehicles from the highway further south, particularly Ngauranga Gorge, where they are now a major contributor to congestion.
15. The Petone-Grenada link would complement State Highway 2, and may even serve as an alternative after a possible earthquake.
16. Wellington City has a high uptake of public transport. For example, on average the people of Wellington City use the bus 101 times a year – this is the most of any urban area in Australasia. The provision of efficient, reliable and convenient public transport is thus crucial. Nevertheless, private vehicles will remain Wellingtonians' preferred mode of transport for certain activities. Property

Page 2 of 5



Council advocates for a balanced approach and submits that the Plan must therefore provide for well-designed road systems to accommodate the use of private vehicles, as well as seek to enhance public transport services and the use of other options (such as walking and cycling).

*Housing*

17. Property Council agrees more houses will be need to be built to cater for the expected population growth, and that they would need to be of good quality and in the right locations.
18. Businesses need clarity and certainty. The Plan must thus communicate clear principles so that developers, contractors, Council officials, et cetera have a sound understanding of where specific rules have emanated from and what their intentions are. It is also important for economic feasibility to be accounted for. Otherwise, development will not take place.
19. Parks, convenient transport links, general layout, safety, and proximity to recreational activities, shops, schools, health services and community infrastructure are all fundamental factors which determine where individuals decide to live. It is therefore vital that the Plan facilitates the provision of these in identified growth areas, and serves as a catalyst for mixed-use development; our members observe that Te Aro has a lot of potential in this regard.
20. A 'concrete jungle' with too few parks and recreational areas (as is the case in Johnsonville) will do little to promote investment in a suburban growth centre. The Plan must provide a platform for the Council's future long term and district plans to rejuvenate such areas. For example, turning a busy road (such as Victoria Street) into a tree lined and vehicle/pedestrian/cyclist friendly boulevard may promote investment.
21. The provision of incentives encourages development and it is important for the Plan to support the provision of the same; incentives could range from waiving development contribution charges for a number of years to a credit per unit built or per square metre of building. Property Council avails itself for further discussion in this regard. The Hutt City Council already is already providing incentives.
22. It is important for the Plan to enable a platform acknowledging the additional rates a completed development (as compared to the original rating value of the subject site) would translate into.

*City Resilience*

23. Property Council is pleased to note the draft Plan supports the strengthening of earthquake-prone heritage buildings. It is, however, important for the Plan to help ensure the exercise is feasible for building owners.
24. It is clear we have a number of beautiful buildings, which reflect our history and are therefore truly worthy of protection. However, to date, judgments on the listing of heritage or character buildings in district plans have been based on aesthetics and historical factors. The risk profile of the building and the economic implications of strengthening in order to enable retention have not been



adequately regarded. In light of the significant costs involved in strengthening our building stock, there needs to be far more careful consideration of the extent to which district plans will seek to retain buildings. Unrealistic expectations on heritage and character will have significant detrimental impacts both on the local community and for building owners.

25. Where it is in the community's interest to strengthen (rather than demolish) an earthquake-prone building, but it is not economic from the landowner's perspective, the community (through the council or state entities) should be prepared to make a financial contribution to make strengthening viable. In the absence of such a commitment, it is questionable whether the community truly values the building, and unreasonable for the regulatory regime to require uneconomic upgrading from owners. As such, demolition ought to be enabled and the building should no longer be classified as heritage.
26. There are community benefits which result from strengthening heritage buildings. Therefore it is reasonable that owners of such buildings are provided assistance with costs of strengthening and preservation. Waiving resource consent fees, the provision of effective grants and loans, transferrable development rights, and rates relief should all be seriously considered for seismic strengthening of heritage buildings.
27. This is in line with the Contingent Valuation method, which is one tool local authorities should use to identify exactly what the community truly values and is willing to contribute to protect, and hence which buildings should be classed as heritage. Under this approach, a hypothetical market is considered, and people are surveyed as to how much they would be willing to pay to preserve or improve a historic asset. This provides an indication of the community's value for the building. Such an approach acknowledges that heritage is not something to be determined exclusively by "experts" – rather it is something that requires community participation as a basis for implementing protections – and gives weight according to the community's preference. Such an approach, combined with other cost/benefit analysis and tools, would help ensure a more robust method for heritage identification and preservation.
28. Property Council submits that the Plan incorporate the principles of the Contingent Valuation method.

**Concluding Remarks:**

29. We thank the Council for giving us the opportunity to comment on the draft Integrated Business Precinct Plan.
30. The success of the Plan lies in Wellingtonians being able to relate it and being aware that there are benefits in aligning themselves to it.

DATED this 15th day of October 2014.

Page 4 of 5



A handwritten signature in black ink that reads "Mike Cole".

Mike Cole, President, Wellington Branch  
Property Council New Zealand

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OFFICE OF THE CHIEF OPERATING OFFICER

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13 October 2014

Wellington Urban Growth Plan (COP002)  
Wellington City Council (CAB2)  
PO Box 2199  
WELLINGTON 6140

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**Wellington Urban Growth Plan 2014-43 – Victoria University of Wellington submission**

I am pleased to have the opportunity to comment on the Wellington City Council's Draft Urban Growth Plan 2014-43 on behalf of Victoria University.

The University community is an important element in the makeup of Wellington city and the Council's planning and strategies to cater for future growth and development are naturally of interest.

The Urban Growth Plan outlines the expectation that Wellington City's population will increase by approximately 50,000 over the next 30 years and proposes strategies to help ensure that housing, infrastructure and services are developed in a sustainable and appropriate way.

This submission comments on aspects of the plan, such as population growth, developments on campus, student accommodation, public transport and the natural and built environment, which will impact on Wellington, the University as an organisation, and our community of staff and students.

**Growth at Victoria**

Victoria's planned growth will be a significant contributor to the expected population growth of 50,000 people in Wellington over the next 30 years.

Victoria has recently finalised a new Strategic Plan. As part of this plan, the University has set a goal to attain the scale, quality and academic profile of a leading public university.

Victoria will be focusing on growth, while maintaining quality, as we embark on the long-term strategy to achieve our vision of becoming a world-leading capital city university and one of the great global-civic universities.

This will mean that Victoria will be working to approximately double its current size over the next 20 years, with a goal of reaching 30,000 equivalent full time students (EFTS)— an increase of about 20,000 students.

These staff and students will be a positive addition to Wellington, bringing creativity, diversity, vitality and economic benefits.

It is important to signal that these additional staff and students will also have a significant impact on housing and transport demand, particularly in Kelburn and in the central city. The University will continue to work closely with the Council on related issues arise over the coming years as a result, such as transport links.

#### **Connecting our campuses with Wellington**

Victoria is expanding its physical presence in Wellington, with some ambitious plans for our Kelburn and Pipitea campuses set to commence at the end of 2014.

A new science teaching and research building on Kelburn campus will add 12,000 square metres of new modern teaching, research and laboratory facilities, and at Pipitea campus, Rutherford House will have a six-floor annexe added that will provide modern, fit-for-purpose teaching spaces. The ground and mezzanine floors, adjacent to the Lambton Quay side of the building, are being designed to act as a focal point for engaging with surrounding business and government communities.

The University has also recently purchased the Gordon Wilson building and site at 314 The Terrace from Housing New Zealand. This is an exciting step in our longer-term capital plans and we will be exploring various options for utilising the site, which has the potential to be a new front door to the Kelburn campus.

#### **Student accommodation in the city**

In recent years, Victoria University's suite of student accommodation in the city has grown and there are now approximately 1,600 Victoria students based in central Wellington, at new Halls of Residence on the Terrace, Boulcott and Willis Streets.

The University continues to be proactive in addressing the increasing demand for student accommodation, and a new 390-bed hall of residence, Katharine Jermyn Hall, located at 175 The Terrace will be opening in time for the 2015 academic year.

As mentioned above, the increase in the number of tertiary students living and studying in central Wellington has an overall positive impact on the inner city, with the diverse student population bringing added creativity and vitality.

These development projects all involve working closely with the Council and we are confident that the expansion of the University's presence in the city will contribute to enhancing the vibrancy and character of Wellington and align with the goals outlined in the Urban Growth Plan.

#### **Public transport**

We encourage Wellington City Council to work closely with Greater Wellington Regional Council in planning public transport for the future to ensure the city provides widespread, efficient public transport routes that are future-focused.

While investment in public transport routes along the 'growth spine' and urban connections is of course a priority, the Council must ensure that growth in areas such as

the Wellington CBD and Kelburn (which will result as Victoria grows) is accommodated appropriately.

As noted in our recent submission on the Council's annual plan, the University supports the decision to invest in improving the quality and safety of Wellington's walking and cycling networks, and to continue investing in, and improving, the public transport system. The University also supports our students in their negotiations with local and regional bodies for more affordable, efficient public transport.

The safety and ease with which our students and staff move around the city is important, and the University supports the Council's decision to invest in new and improved cycling and walking routes.

Victoria will continue to work with the Council on issues such as the quality of footpaths and street lighting that affect members of the University community, and on matters relating to public transport.

#### **Natural and built environment**

Victoria supports the Council's commitment to biodiversity and encouraging sustainable building practices, and is committed to a continued partnership with the Council on related projects such as Our Living City.

The signing of a new research agreement between Victoria and the Council at the end of 2012, was one example of how the University is supporting the Council to explore issues such as ecological restoration, sustainable growth and enhanced urban design, to increase urban nature connections throughout the city.

This partnership has led to a number of new initiatives between Victoria and the Council, including the establishment of a Post-Doctoral Fellowship in Cities and Urban Nature, a new position jointly funded by Victoria University and Wellington City Council; the establishment of Growing Graduates, which sees 2,000 native trees planted each year for five years in the Town Belt; and this year, the first external 'green wall' was unveiled at Victoria's Kelburn Campus. In addition, eight students joined the Council for a 10-week internship as part of Victoria's Summer Research Scholarships programme in 2013-14.

As you will be aware, Victoria's School of Architecture and Design conducts regular student projects focused on enhancing Wellington's inner city. For example, a recent project explored the future of Cuba Street.

This project was supported by the Council, and saw plans developed for 70 buildings on Cuba Street by fourth-year students from the School of Architecture. Supervised by structural engineers and architects, they developed physical models and plans to show how heritage buildings could be seismically strengthened and how the street may look in the year 2035.

A current project is now looking at buildings and urban qualities around Newtown, Berhampore and the shopping centre on John Street, and other projects in the wider Wellington area have focused on Porirua and Upper Hutt.

**Conclusion**

The University works alongside the Council on a diverse range of initiatives, and we look forward to continuing to work with you as Wellington grows and prospers in the future.

The University will be working to play an increasingly important role in the facilitation of innovation, entrepreneurship and sustainable economic growth in Wellington. We will endeavour to provide expertise and support, wherever possible, that contributes towards achieving the vision of Wellington as a Smart Capital, and a place where talent wants to live.

Victoria is committed to deepening engagement with our communities and I am confident this will result in continued and strengthening connections with Wellington City Council.

Yours sincerely,



Andrew Simpson  
Chief Operating Officer

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by

- **Post**

Freepost  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz) ✓

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

Last name\*

Wellington Electricity Lines Limited c/- Tim Lester (Edson Consulting group)

Street address\*

Petone

Phone/mobile

021 993 223

Email

tim.lester@edson.co.nz

### Your feedback

I am making feedback  as an individual  on behalf of an organisation

Name of organisation

Wellington Electricity Lines Limited

**Feedback is required by 5pm on Monday 13 October 2014.** ✓

#### Privacy statement

All feedback (including name and contact details) is published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

CSWCC68951

Please provide your feedback here. Add extra pages if you need to.

*See attached*

1st fold here - fasten here once folded

Thank you for your comments.

**Please return this feedback form by 13 October 2014.**

2nd fold here

Free Post Authority Number 2199

**Absolutely Positively  
Wellington City Council**  
Me Heke Ki Pōneke



FREEPOST

Wellington Urban Growth Plan (COP002)

Wellington City Council (CAB2)

PO Box 2199

Wellington 6140

## **PROPOSED URBAN GROWTH PLAN**

**To:** Wellington City Council  
**From:** Wellington Electricity Lines Limited  
**Date:** 10 October 2014

### **1 About Wellington Electricity**

- 1.1 Wellington Electricity Lines Limited (WELL) owns and operates electricity distribution network assets within the Wellington Region (Wellington City, the Hutt Valley and Porirua Basin). This network has a system length of 4,600km and serves around 400,000 customers.
- 1.2 WELL is committed to providing its customers in the region an effective and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities including hospitals, schools offices and residential dwellings.
- 1.3 WELL owns distribution substations, lines and cables located in public road reserve, as well as on private property and along easements.
- 1.4 In addition to the supply of low voltage connections to industrial, commercial and private customers, WELL also owns and operates high voltage sub transmission infrastructure (11kV and 33kV) consisting of lines and substations, and has the ability to own and operate high voltage (up to 110kV) transmission lines, and associated structures.

### **2 Proposed Wellington City Council Urban Growth Plan**

- 2.1 The Wellington City Council Urban Growth Plan (UGP) is a high level strategic spatial plan that has been prepared to replace the Wellington City Council (WCC) previous urban development and transport strategies. The stated purpose of the UGP is to 'preserve the city's character, keep the city compact and connected to nature, and ensure a sustainable and efficient transport network'.
- 2.2 WELL support the purpose and intent behind the UGA as strategic planning for future growth in the district mirrors the strategic intent of WELL's Asset Management Plan.
- 2.3 WELL's interest and recognition of the UGP's value to development across the city is evident by this submission to the draft version of the document, and willingness to participate in the UGP's development.
- 2.4 WELL acknowledges that the UGP is a high-level master planning document with specific information not being intended to be presented in significant detail.

- 2.5. WELL also acknowledge that the UGP is a WCC document with an emphasis on how Council intends to provide for the city's future development.
- 2.6. The substance to this feedback provided by WELL is intentionally broad and is at a level designed to complement the strategic nature of the UGP.
- 2.7. The feedback provided by WELL to WCC is centred on the following key themes:
- Ensuring that the recognition of the city's electricity distribution network is an integral component of the UGP.
  - To provide clarity and consistency in the document so that successful implementation of the strategy is enhanced.
  - To ensure future development across the city is undertaken in a sustainable manner with the full consideration of *all* development partners.
  - Clarify developers obligation to consult with and bear financial obligation for infrastructure provision or upgrades.
3. **Key themes for Wellington Electricity in the UGP:**
- 3.1. WELL owns and operates a network of electrical lines, cables and substations across the greater Wellington Region. Operating and maintaining this network in a well-planned, efficient and cost effective manner is of paramount strategic and statutory importance to WELL so as to ensure that obligations under the 1986 Commerce Act, 1992 Electricity Act, and various electricity regulations are met.
- 3.2. The effects of electrical load growth brought about through intensified urban land use (such as that outlined in the UGP) has to be strategically absorbed into WELL's operational and maintenance plans in such a way as not to compromise planned developments or upgrades to other parts of the network in the greater Wellington region.
- 3.3. In the executive summary, the UGP explicitly states that: "*infrastructure and services are to be developed sustainably...*". To this end WELL consider that, overall, not enough emphasis is placed on the electrical distribution network.
- 3.4. WELL acknowledge that through-out the UGP constant reference to 'infrastructure' is provided; however, such references are vague and therefore do not reflect *how* the importance of a secure supply of electricity relates to sustainable development.
- 3.5. WELL consider that the draft UGP does not provide enough clarity, hence certainty, in the intent behind the document. Whilst it is acknowledged that the term 'infrastructure' is applied throughout the document (and indeed a section of the document is dedicated to infrastructure – page 26) the usage of the term varies through-out the document between 'infrastructure', 'reliable infrastructure', and 'critical infrastructure'.
- 3.6. In consideration of the draft UGP's recognition of infrastructure, WELL recommend that a definition for 'infrastructure' is provided in the document.
- 3.7. WELL notes that the intent of the UGP is to provide an 'umbrella' document that will be implemented through various other Council policies, bylaws and planning documents. As this is the case, WELL consider that explicit reference to Wellington Electricity Lines Limited (or WELL) as a development partner needs to be pre-

emptively recognised in the UGP for effectiveness the subsequent implementation tools.

- 3.8. The reason why WELL are seeking explicit recognition as a partner in the UGP (similar to the NZTA, GWRC, and various other infrastructure asset owners) is because early consultation between the developer and WELL is vital at the inception phase of any given development.
- 3.9. Such recognition of this early consultation in the UGP will be translated down through the UGP's various implementation planning tools (i.e. the Wellington City District Plan).
- 3.10. The effect of WELL recognition in the UGP as a development partner will be the sustainable development of the city's urban form – a key objective of the UGP.
- 3.11. WELL notes that the draft UGP gives some comment (one decisive statement is noted) on developer's obligations to consult with and bear financial obligation for infrastructure provision or upgrades (see page 26); however, WELL considers that the UGP needs to reiterate developers funding obligations (in consideration of infrastructure services) through-out the document.

#### 4. Additions, Changes or amendments Sought by WELL.

- 4.1. That the UGP document recognise that a secure supply of electricity is of critical importance to the city – particularly in regard to city resilience and natural hazards.
- 4.2. That the UGP provide either a glossary of terms, or a description clearly articulating what 'infrastructure' is taken to include in the UGP. Such additions need to clarify that not all infrastructure is Council owned or managed assets, and rather that privately owned infrastructure, such as the electrical distribution network, represents critical infrastructure to the successful outcomes envisaged by the UGP.
- 4.3. Further to the above, that the UGP expands upon the Infrastructure section (page 26) to acknowledge that not all infrastructure ('that is key to Wellington being a successful city') is only Council owned infrastructure. Such elaboration can be provided by attaching a glossary (as suggested in the preceding paragraph), or alternatively by referring throughout the document to the 'infrastructure asset owner' (where appropriate).
- 4.4. In the section titled 'The infrastructure by 2043 – what we plan to happen' (page 28), include a new bullet point stating:

*"Work collaboratively with other infrastructure asset owners to coordinate growth and its effects on effective service supply."*

- 4.5. Include references throughout the document (where appropriate) to 'infrastructure asset owner partners' to reflect the integrated function network utility operators, such as WELL, have in successfully achieving the UGP objectives. An example of where

such reference should be provided is on page 36 where the North Wellington Growth Plan is discussed:

*“... This also includes working with other infrastructure asset owner partners such as NZTA and landowners to integrate the proposed Petone...”*

4.6 As indicated in paragraph 2.7, WELL consider that the UGP should reinforce, through-out the document, the requirement that developers bear the appropriate financial costs for consequential infrastructure development or upgrades. WELL acknowledge that development contributions are set in provisions contained within the District Plan; however, for non-council owned assets, such as the electrical supply network, high-level planning documents (i.e. the UGP), provide an opportunity to reinforce a developers obligation to fund both Council owned, and non-Council owned infrastructure where appropriate.

#### 5 Conclusion

5.1 WELL acknowledge the importance of strategically managing and planning for future urban growth in Wellington City, and therefore appreciate the opportunity in providing feedback on the draft UGP.

5.2 The themes highlighted in this submission are not intended to be overly detailed as the UGP is recognised as a high-level strategic document. Consequently, many of points made should be broadly applied across the whole UGP document.

5.3 WELL would welcome the opportunity to provide more detailed information about the themes presented in this submission if so required.

Signature for and on behalf of Wellington Electricity Lines Limited:



Tim Lester  
021 993 223  
tim.lester@edison.co.nz

Address for service: Wellington Electricity Lines Limited  
c/- Edison Consulting Group  
PO Box 4269, Mt Maunganui South 3149  
Attn: Tim Lester



# Submission to Wellington City Council on the Wellington Urban Growth Plan 2014-43

Prepared by:

**Nadine Dodge, Keriata Stuart, Paul Blaschke, Nick Preval, Philippa Howden-Chapman, and Ralph Chapman**

On behalf of the **New Zealand Centre for Sustainable Cities**

October 13, 2014

## About NZ CSC

The New Zealand Centre for Sustainable Cities is an inter-disciplinary research centre dedicated to providing the research base for innovative solutions to the economic, social, environmental and cultural development of our urban centres. As well as undertaking research, we make submissions from time to time to central government and councils on a range of issues relevant to cities, from climate change policy to the design and reconstruction of Christchurch. The Centre is currently running a 4-year Resilient Urban Futures Programme, funded by the Ministry of Business, Innovation and Employment, which began in October 2012.

Research currently being conducted by the NZ Centre for Sustainable Cities investigates housing preferences as they relate to density and transport.

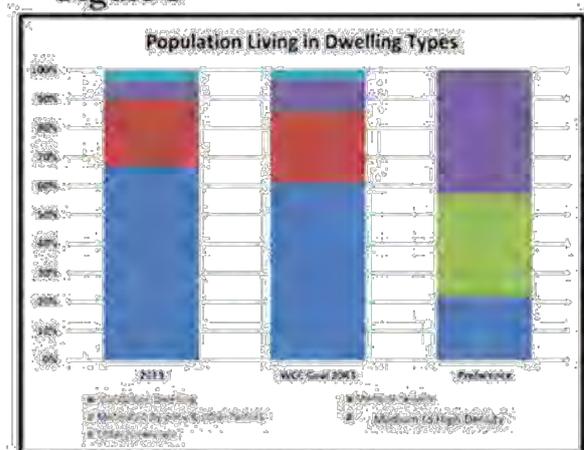
In our study, Wellington residents were randomly chosen to conduct a survey (n=302). Housing choices are used to examine the preferences and trade-offs residents are willing to make between housing attributes. It then segments residents into groups based on their preferences. Three groups have been identified:

## Housing

### Housing Preferences

The proposed goal of intensifying residential development in key growth areas is an appropriate means of accommodating population growth while also furthering the city's transportation and environmental goals. It is also supported by research which suggests that there is a substantial unmet demand for affordable high density housing in accessible neighbourhoods (Figure 1). Moreover, Figure 1 underlines that the demand for standalone dwellings is considerably less than has been previously assumed.

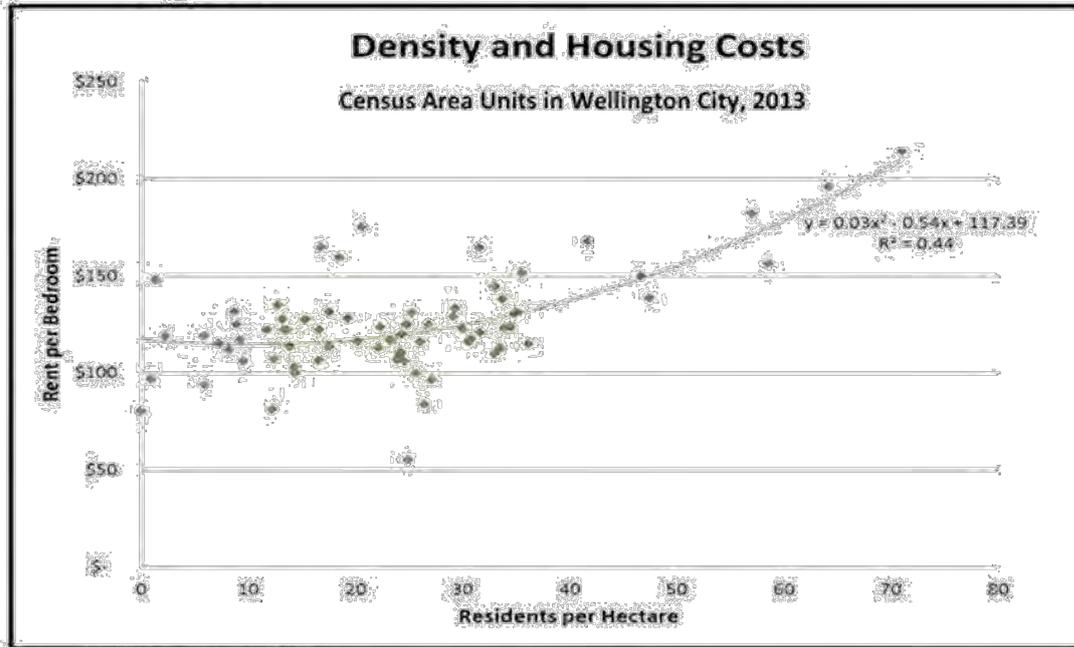
Figure 1



Source: Dodge 2014 and WCC 2014



**Figure 2**



Source: NZ Census 2013

- **High density preference (43%)**

Prefer apartments or townhouses in highly accessible neighbourhoods. However, they would also prefer green outdoor space, which may be a reason why 59% of this group currently live in standalone homes. Off street parking is unimportant to the group, so land devoted to parking would be better used for high quality outdoor space.

would prefer to walk, cycle, or take public transit to work.

(Note: For the background to this research, contact Nadine Dodge at the Centre for Sustainable Cities)

- **Low to medium density preference (36%)**

Would ideally prefer a standalone house with a large section. However, they would like also to live in highly accessible neighbourhoods and affordability is more than two times as important as dwelling type. They do not mind living in a neighbourhood with a mix of housing densities. Off street parking is unimportant to the group, so outdoor space would be better used for high quality outdoor space.

### **Affordability & Density**

In theory, higher density housing would be more affordable, as it provides more units of housing per unit of land area. However, in the Wellington City case, higher density is weakly associated with higher housing costs than low density (Figure 2). On the one hand this suggests that higher density positively rather than negatively affects the utility of dwellings, which is encouraging when considering plans for intensification. On the other hand, it suggests that those who are strongly motivated by price will tend to choose lower density rather than higher density housing. This suggests that affordability may be one reason why many of those with a higher density preference live in low density areas.

- **Low density preference (22%)**

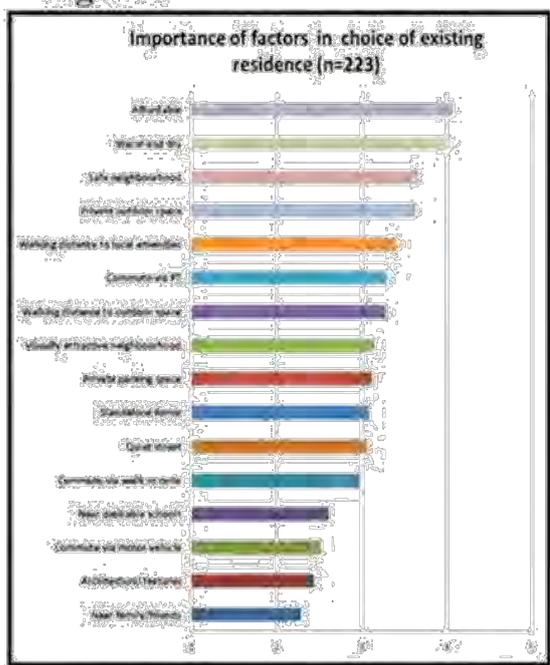
Have a strong preference for a standalone house with a large section, and would prefer to live in a low density neighbourhood. Although they are not strongly motivated by accessibility, three quarters

Additionally, affordability has been found to be the single most important factor when residents are choosing housing (Figure 3). Given these realities,



plans for intensification should focus on affordability. For those with a high density preference, lack of affordability can be a barrier to choosing high density living. For those with a low density preference, the vast majority are more motivated by price than house type, and would therefore be willing to accept medium density housing if it was more affordable than low density housing.

**Figure 3**



Source: Dodge 2014

**Housing Affordability & Health**

One topic which seems to be given insufficient attention in the plan is the provision of affordable and healthy homes. While the plan notes that the quality of medium density housing should be improved, the provision of healthy and affordable homes is an issue for all housing types. In 2043, 8 of 10 people will live in houses built before 2014. Population growth will be accommodated not only by the construction of new dwellings, but also through the renovations of existing dwellings. Given their predominance in the market and their importance for health and inequality, it would be

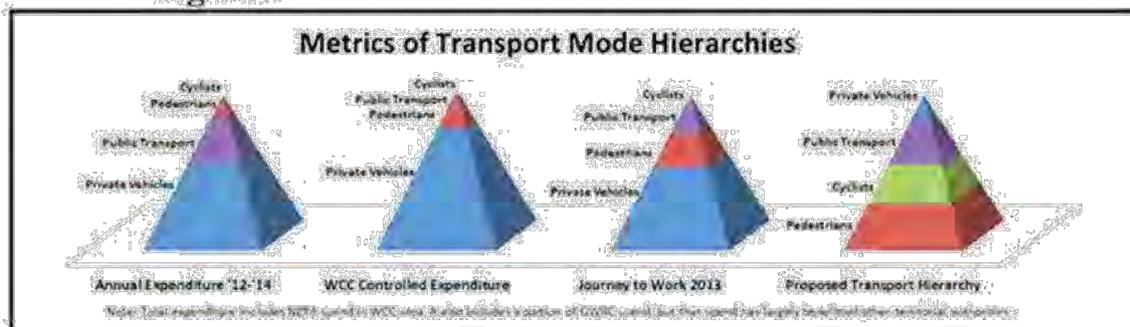
advantageous to see a greater focus on the quality of existing dwellings in the urban growth strategy.

Poor quality housing is cold, damp and contains accident hazards. Randomised controlled trial research carried out by *He Kaitiaki Oranga*, the Housing and Health Programme of the University of Otago, Wellington demonstrates the health benefits of improving insulation and heating and of reducing safety hazards (Howden-Chapman et al. 2007; Howden-Chapman et al. 2008; Keall et al. 2014). These health benefits are gained disproportionately by children, the unwell and the elderly, as such people are more vulnerable and spend a larger proportion of their time in their homes.

Currently 30% of Wellington households rent privately, with this proportion likely to increase by 2043. We know that without adequate incentives many private landlords will not take measures to improve the quality of their rental properties, for example retrofitting floor and ceiling insulation and addressing accident hazards. The resulting costs, such as increased GP visits, more days off school or work, and greater risk of mortality are borne by renters and New Zealand as a whole.

Adopting the rental WOF is one way in which Wellington City Council can address this problem. It is thus heartening to see support for the WOF and for several other actions within the Housing Action Plan noted on pg. 55. However, the Housing Action Plan does not appear to be available on the WCC website, so it is difficult to comment on this matter. We suggest that, in addition to supporting the Housing Action Plan that more tangible actions be taken, such as the inclusion of the rental WOF in the next ITP. The New Zealand Centre for Sustainable Cities would welcome the opportunity to work with the Council to evaluate the effects of the introduction of a rental WOF on the supply of rental housing, residential movement and the health of tenants.

**Figure 4**



Source: Dodge 2014, WCC Annual Plan, GWRC Annual Plan, NZ Census 2014

## Open Spaces

As is noted in the Urban Growth Plan, the central city is being transformed from primarily a place to work to a place to live and work. Research conducted by the Centre demonstrates that those with a high density preference also have a strong preference for outdoor space (Dodge 2014). This could potentially be a barrier for these residents to choose medium and high density living. In areas targeted for intensification, a commitment to transform parks in order to support intensification goals would be a useful means of ensuring that density does not come at the cost of liveability, while ensuring that provision of parks does not significantly reduce density. Specifically, it would be advantageous to see an investment in high quality parks (often small, such as Glover Park) to support a range of uses and serve as a proxy for traditional private outdoor spaces, such as sections.

Brisbane has produced a manual entitled 'Green and open space planning for urban consolidation', a review of the literature and best practice on the aspects of open space necessary to enable high quality dense living, and the Centre notionally supports the use of this manual – its comprehensiveness would be difficult to match.

This plan is also an opportunity to enable new ways of meeting human needs for safe open spaces – for instance, promoting housing developments which enclose car-free open green spaces (Austin, 2011).

Māori indigenous knowledge and models of housing and community space can and should be explicitly taken into account (Awatere, Rolleston and Pauling, 2010; Te Aranga Māori cultural landscape strategy, 2008). Gray & Hoare (2009) have also explored the implications of indigenous knowledge for intensifying the inner suburbs in Wellington, especially in areas where the topography enables more dwellings without loss of green space or privacy.

## Transport

The proposed transport hierarchy is a useful framework from which to approach transportation planning. The hierarchy of modes seems a logical one, as walking and cycling provide the most benefits, which include increased physical activity, decreased emissions, and decreased congestion for road users. Public transport also provides benefits of decreased emissions and congestion, while private vehicles provide the least benefits but will continue to be necessary for many trips.

However, it is unclear how the transport hierarchy is meant to impact policy and planning. A clear framework for implementing the hierarchy into practice is needed for clarity, especially as it is such a significant departure from the existing transport policy hierarchy. Two metrics which could be used to assess outcomes could be the proportional allocation of transport funding and daily mode share for journeys to work (Figure 4). A notionally challenging policy could be to tie the expenditure



for each mode to its share of commutes each morning.

On the face of it, this might seem impossible as it is a departure from the norm. However, NZTA publishes a great deal of data on roading expenditure and Wellington City spends double what most authorities spend on maintenance (NZTA, 2014). Given this, there is an opportunity to reallocate funds earmarked for roading expenditure to improving cycling and walking infrastructure, as well as potentially public transport.

## Parking

We support the plan's goals to balance car parking against other road uses, such as cycle lanes and bus priority lanes. We would also support a shift to a supply and demand based approach to managing parking, as it would further other goals in the Plan, such as making parks easily available for those who need them and ensuring that road space is efficiently used (pg. 51).

In regards to parking in residential areas, we believe a review of the minimum parking requirement is overdue. Census data and our research suggest that residents strongly prefer affordability over the provision of off-street parking, and developers indicate an additional car park can add as much as \$75,000 in cost to a home. Further research could provide information on the current supply and demand for parking and the efficacy of different means of parking provision in meeting the city's needs. In doing so, the plan should account for the demographic ageing of Wellington's population in the next thirty years, as well as recent experience which suggests that Generation Y residents will drive less than previous generations.

In regard to the goal of 'making parking information more accessible and improving enforcement servicing and pricing' (pg. 51) demand responsive smart metering is a carpark pricing technique made possible with emerging technology which can efficiently achieve these goals. Demand-responsive pricing helps ensure that parks are available where people need them; it encourages drivers to park in underused areas

and reduces demand in overused areas, and reduces searching for parks. The varying parking fees will allow more efficient access and use of parking spots. SEPark in the City of San Francisco provides a good model of how this can be done (City of San Francisco, 2014).

In regard to making parking information more accessible to users, many cities have partnered with app developers to help people find available parks more quickly, or even digitally book a parking spot, which reduces traffic and emissions associated with searching for parks and allows customers to park and get to their destinations more quickly (for example, City of Perth 2014).

## Māori & urban planning

Including Māori values, knowledge and experience in urban growth planning is desirable. While the draft plan gives limited recognition to the place of Māori, particularly local iwi/hapū (p28) it does so almost entirely in the context of 'history' and 'heritage' and refers mainly to historic sites and individual heritage items such as artworks. In doing so, the plan misses the opportunity to recognise and benefit from the body of research on how Māori knowledge can contribute to creating urban form that connects people and their environment. Taone Tupu Ora (2011) includes research showing how community-generated Māori principles can inform housing developments (Awatere, Rolleston and Pauling, 2011), and on suburban intensification and indigenous settlement patterns (Gray and Hoare, 2011). This, and other research such as Harmsworth (2004) and Awatere et al (2008), identifies both general principles and specific actions that could inform the Plan.

The draft growth strategy also omits any recognition of the value of Māori knowledge and perspectives in including green and 'natural' spaces in Wellington's new urban form. Models for this, such as Te Aranga Māori Cultural Landscape Strategy (2008), are being recognised in other urban long-term plans.



The following table highlights suggestions and responses to specific aspects of the plan.

<b>Response to Specific Aspects of the Urban Growth Strategy</b>			
<b>Page</b>	<b>Goal</b>	<b>Issue</b>	<b>Suggestion</b>
10	Ensure development occurs close to employment, services, and public and other transport links.	Unclear how WCC will ensure this. Will this be a voluntary programme or incorporated into the district plan?	Define minimum public transport access required for new residential/commercial development. Suggested actions: 1. Require that new development must occur within 400 metres of frequent (15min frequency) PT stops, as this is the commonly accepted maximum distance to walk to transit. 2. Prioritize public and active transport oriented (rather than automobile oriented) development in existing town centres through removing parking requirements in all MDRA's/SHAs.
10	Improve the resilience of the city against the risk of natural hazards and climate change.	Unclear how this goal will be translated into action.	Climate change adaptation has already been operationalised in many vulnerable cities around the globe. As the city in New Zealand that is most vulnerable to sea level rise, Wellington needs to begin planning and implementing climate change adaptation measures imminently, including a notification process for staged withdrawal of Council protection of properties (managed retreat) in areas of high vulnerability such as Teahā Bay. It would be ideal to see adaptation incorporated into all urban planning documents, such as this plan.
18	Target for new housing density types: low 25%, medium 35%, high 40%.	Unclear how density is defined. Appears to be measured by dwelling type, but this is unclear. Dwelling types are not universally synonymous with density, i.e. density depends heavily on design, not just dwelling type. Oriental Bay/Mt Victoria are great examples of high density areas with a large number of standalone dwellings.	Adopt a population-weighted density measure, and adopt standards for what constitutes "high", "medium" and "low" density. Calculate this using NZ Census data at the meshblock level, and classify how much of the city is living at each level of density. This would take little time. Then, adopt a growth target and pathway based on research revealing the preference of Wellington City residents. Our research using a list of respondents provided by Wellington City Council research shows that 43% of Wellington City residents want to live at high density, 22% want to live at low density, and the remaining 35% have other priorities (such as affordability) but are open to either.
19	Investment in natural environment and parks keeps pace with the city's population growth, intensification in urban areas, and new housing development in greenfield locations.	Unclear how this goal will be translated into action. Needs for parks will be substantially different in greenfield and intensified urban areas, so goals for each area would be valuable.	For the central city, establish that parks should support intensification goals. Invest in central city parks to support a range of uses and serve as a replacement for private outdoor space/sections. For greenfield locations, ensure a minimum level of greenspace access during the consent process. Establish targets for use types of open space for each topology. It is important to note that it is not area of open space that is critical, but rather its ability to support a range of uses.
19	Indigenous biodiversity is protected and restored.	Unclear how this goal will be translated into action. Unclear to what extent biodiversity would/should be restored.	Establish clear goal or refer to goals in Biodiversity Action Plan.



Page	Goal	Problem	Suggestion
19	The environmental impacts of urban development and transport are minimised and embody sustainable, low-impact urban development principles.	It is unclear how the WCC can control this and what exactly is being described. For urban development, will this be a voluntary programme or incorporated into the district plan? For transport, how will this be done?	Specify which environmental impacts will be minimised and how. This is very unclear in the plan and could refer to localised air emissions, carbon emissions, impacts on water bodies, energy use, land use, etc. State how this will be implemented through District Plan, voluntary program, and/or WCC Policy.
19	There are more green buildings and an established green infrastructure network across the city.	Unclear how this goal will be translated into action. Definitions for a 'green infrastructure network' and 'green buildings' are unclear.	Establish clear definitions of 'green infrastructure network' and 'green buildings' and state clear goals for each. Establish a green building standards program that requires a certain level of accreditation for any building over a certain size. Establish a greenway network plan in conjunction with the removal of further roading.
22	Land use and development in areas most at risk from the impacts of natural hazards and climate change is managed to minimise risks.	Unclear if WCC has plans to adopt standards/policies to minimise risk.	State if WCC has plans to adopt district planning rules to minimise risk in high risk areas. Take overall climate change policy; current policy settings do not appear to reflect this concept.
22	City's buildings and transport network is increasingly resilient to natural hazards and climate change.	Unclear if WCC has plans to take action regarding climate change adaptation.	Adopt a goal for resilience/hazard/climate change adaptation planning. Stronger connections between this plan and Climate Change Action Plan.
24	Wellington's cycling safety, as measured by the rate of injuries and deaths of people on bikes, significantly improves.	Rate of injuries and deaths of cyclists is a misleading metric when used alone, as cyclists often avoid very unsafe routes, resulting in low rate of injuries and deaths. An even greater number may avoid cycling altogether if it is perceived to be unsafe, further reducing rates of cyclist injury and death.	Include cycling rates as a metric of cycling safety in addition to the rate of injuries and deaths, as the most proven way to increase cycle safety is to increase cycling rates. Add 'level of service' standards for cycling and walking. Add metric of km of high-quality (using a defined level of service) cycleway. Target higher levels of service on average across the transport network for cycling and walking than for other modes. Another option would be to monitor perceptions of cycling safety among both current and potential cyclists.
25	Implement new hierarchy of transport planning and policy.	The importance of this hierarchy appears to be lost in the operationalization of Wellington's transport plans. The current transport plans reflect a clear and overwhelming preference for the car over any other mode.	Adopt standards that transport spending on the private vehicle must not exceed mode share for journeys to work (44%). There is ample room for savings in roading maintenance and capital expenditure budget, according to NZTA metrics. Wellington City spends more than twice what Dunedin and Christchurch spend per lane km of road network on maintenance, and nearly twice what Auckland spends. This excess funding would be better spent on other modes. Adopt standards that measure the average level of service for each mode in any new project including maintenance - and a framework that defines the targeted level of service for pedestrians, cyclists, PT and cars for a given road type. Prioritize the private car only on state highways.



Page	Goal	Issue	Suggestion
51	Parking policy	Currently the parking policy in the document mixes between two theories of parking management. It mixes the theories of supply and demand with those of predict and provide. The result is that predict and provide parking incurs massive costs to Wellington City – work in Auckland indicates that each excess parking spot can come with an opportunity cost of \$20,000 or higher.	Remove the minimum parking requirement wherever practical. NZCSC research shows that many areas outside the central city are showing half or more of households going without a car – even if they have a parking spot. Census data indicates that residents living in multi-unit dwellings own far fewer cars than those who live in standalone houses. 40% of these households do not own a car. As a result, medium density residential areas and special housing areas are key targets for such an intervention. Additionally, development opportunities to create more high-quality medium-density housing capacity will only be constrained by not allowing the market to set the supply and demand of parking. Developers will not build a home they cannot sell, and are best positioned to determine whether or not a given development needs a substantial parking allocation.
51	Commuter parking/central city parking	Stated goal is to move away from a focus on commuter parking. However, this seems at odds with practice, which is reopening the James Smith and Reading car parks.	The reopening of the James Smith and Reading car parks presents a significant opportunity for the city. NZTA data shows that the closing of these car parks showed no influence on transport outcome measures, meaning that there is likely a large oversupply of central city parking for commuters/shoppers. As a result, the reopening of these car parks (and thus the provision of parking which is known to be excess to demand) presents a huge opportunity for Wellington City Council to put words into action by investing in alternative transport modes around the central city and removing parking on busy streets where demand for bus service or cycling is high. Multiple streets around these two parks could benefit from this kind of investment, and it would present an excellent opportunity to put the road space to better use to suit residents' desires.
55	Rental Warrant of Fitness	Support for a rental WOF is good in theory but is a bit nebulous in the Plan.	A focus on the quality of existing dwellings is critical to urban growth planning, as approximately 80% of residents will live in pre-2014 dwellings as of 2043. The quality of rental homes needs to be incorporated into planning, as an increasing percentage of residents rent rather than own. A focus on the renovation and improvement of existing dwellings could both improve quality of life for residents and also be another means of accommodating population growth by adapting the housing stock to changing needs that accompany demographic changes.
41-48	Commitment to innovation (e.g. uber, carshare)	A commitment to innovation should not be applied selectively to new markets like ride sharing, when ample innovation is occurring in other relevant markets.	New standard-bearing transport options are called out by name (e.g. Uber) as options needing support. Notionally, this support of innovation is positive. However, we advise against singling out one supplier for support in a public strategy document, as "picking winners" can reduce competition driving further innovation and cost savings. A commitment to innovation in the space, whether it be ride sharing, car sharing, digital parking management and booking, space optimization on roads (by increasing the provision for pedestrians, cyclists and public transport) and spatial optimization for development (by helping get larger blocks for innovative new developments) will yield tangible benefits in affordability and quality of life for Wellingtonians in the future.



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## Submission on the Draft Wellington Urban Growth Plan 2014-2043

Prepared by Paul Young on behalf of Generation Zero Wellington, October 2014.

### 1. About Generation Zero

Generation Zero is a youth-led nationwide organisation launched in 2011 with over 10,000 supporters. We believe that New Zealand has the ability and opportunity to be an example to the world of how to rise to the challenges of climate change, while creating a better country in the process. Our vision is for a thriving, zero-carbon Aotearoa by 2050. To achieve this, we advocate for the development and implementation of comprehensive local and national government plans, along with immediate steps to reduce greenhouse gas emissions and fossil fuel dependence. Generation Zero is not aligned with any political parties and is 100 percent independent in its views.

### 2. Introduction

We thank Wellington City Council ('the Council') for the opportunity to submit our views on the draft Wellington Urban Growth Plan ('the Plan'). We congratulate the Council for the overall intent and direction signalled in the Plan, and emphasise that our comments in this submission tend to focus on the areas where we find disagreement or see room for improvement, rather than the vast majority of the Plan's content with which we agree.

The reason for Generation Zero's strong interest in the Plan and the associated issues is that urban development and transportation are key areas for strategic action in responding to climate change. That message is compellingly articulated in *Better Growth, Better Climate: The New Climate Economy Report*, released in September by the Global Commission on the Economy and Climate. Chaired by former President of Mexico Felipe Calderón, the Commission comprises former heads of government and finance ministers (including former Prime Minister Helen Clark), and leaders in the fields of economics, business and finance.

This landmark report focuses on opportunities for countries across the world to reduce greenhouse gas emissions while achieving "high quality, resilient and inclusive growth". It devotes an entire chapter to 'Cities', explaining the social, economic and environmental costs due to poorly planned sprawl and the opportunity to reduce carbon pollution while boosting productivity by building compact, connected cities. We include several quotes in this submission and highly recommend reading the chapter in full. The report proposes a 10-point Global Action Plan of key recommendations to decision-makers, one of which is: "Make connected and compact cities the preferred form of urban development, by encouraging better-managed urban growth and prioritising investments in efficient and safe mass transit systems."

To repeat, we strongly support the general vision and direction for Wellington's urban development laid out in the Plan, which is very much in line with what the *Better Growth, Better Climate* report

Available at <http://newclimateeconomyreport.org>



advocates. Where we would improve this is mainly in the level of importance and urgency prescribed, and delivery mechanisms to ensure good aims and intentions are achieved.

### 3. Cross-cutting issues

#### 3.1 Integration of urban development, land-use and transport planning and decision-making

Urban development, land-use and transport are strongly intertwined and interdependent, and for that reason it is a very good idea to bring these together into one strategic plan to replace the previously separate Urban Development and Transport Strategies. The *Better Growth, Better Climate* explains that consistent decision-making across these linked areas geared towards creating a compact and connected city is needed to create a virtuous circle of lower carbon emissions and better economic well-being and growth prospects (see quote below). We are pleased to see this acknowledged throughout the Plan.

*"More compact urban growth can significantly reduce the cost of providing services and infrastructure, and the rate of development of new land. It also significantly increases the viability of public transport and other urban infrastructure, by attracting more intensive use, and creates a deeper labour market that can achieve faster and better job matches. Moreover, the components of this system are self-reinforcing, generating a virtuous circle: more compact urban centres concentrate urban innovation and job creation, helping to attract talent and capital for investment in smarter infrastructure and technology, and widening the skilled labour pool."*

[*Better Growth, Better Climate*, Chapter 2, p. 11]

#### 3.2 Monitoring, performance measures and delivery mechanisms

While most of the aims described in the Plan are laudable, in our view many of them are lacking clear and specific performance measures and frameworks to monitor progress and ensure delivery. We believe the Council should - wherever possible - define more specific performance measures, with the intention that consistent performance targets be implemented in shorter-term operational plans and policies.

Three examples of this are:

- One of the Plan's objectives is: "Ensure development occurs close to employment, services, and public and other transport links" (p. 10). It is unclear from this and the full document how "close" is defined, and what measures the Council will use to ensure that this occurs. The Council could, for example, implement a requirement that new developments must occur within a certain distance from frequent public transport links, or at least set performance targets to that effect.



- The Plan presents a transport system hierarchy and states that the Council plans to "encourage and prioritise walking, cycling and public transport over other modes of transport" (p. 42). It is unclear how this will be operationalised at either a city-wide level or individual project level. The Council could, for example, implement standards for funding levels for different modes reflecting the hierarchy, and/or establish a framework based on measuring and improving "level of service" of different modes to make prioritisation more transparent and measurable.
- The Plan states that one aim for 2043 is: "The public transport system is fully electrified and there is a significant number of private electric vehicles on the road" (p. 24) and makes other commitments to "support" and "advocate for" this to happen (e.g. "We support a fully electric service as soon as possible", p. 48). We appreciate that decisions about public transport services are currently not under the Council's control, but the Council could at least specify performance measures it will monitor and expect improvement in, such as the percentage of public transport vehicle-kilometres carried out by electric vehicles or the average bus fleet energy efficiency weighted by travel distance.

#### 4. Comment on specific topics and points:

##### 4.1 Urban form and housing choice

The Plan states targets for new housing density types - low: 25 percent; medium: 35 percent; high: 40 percent (p. 18).

The definitions of these categories are unclear; the Plan needs to specify how these categories are measured and defined (e.g. population per hectare levels).

The rationale for why these particular targets were chosen is also unclear, although discussion on p. 17 seems to suggest that they simply extrapolate existing trends. The Plan emphasises the importance of providing a range of housing choices, but we do not see evidence that housing preferences have been genuinely and thoroughly assessed, and a rational supply-and-demand approach applied to planning for future development. We caution simply interpreting existing housing market behaviour to represent true preferences. Research by Nadine Dodge at the New Zealand Centre for Sustainable Cities indicates that, in relation to Wellington's current living patterns, there is significantly higher preference for medium-to-high density living (43%) and lower preference for stand-alone dwellings (22%).

We argue that - given the clear benefits of higher density development (see quote below) and evidence of strong latent demand for higher density living - there needs to be much stronger justification to show that greenfield development is in fact needed on the scale proposed in the Plan. Without such justification, the Plan should be amended to target and support greater medium-to-high density development in the central city and along the growth spine.

Furthermore, if greenfield development is to go ahead, we question the apparent assumption that the housing necessarily be low density. The Plan seems somewhat contradictory here, in some places:

Dodge, N. (2014). Housing Preferences in Wellington, NZ. Unpublished PhD Research. New Zealand Centre for Sustainable Cities.



reinforcing this notion (e.g. p. 17) while in others suggesting that higher density might be encouraged – e.g. on p. 56: "Promote more efficient land use in greenfield areas – this includes exploring opportunities for denser development and subdivision in identified greenfield areas, and completing a stocktake of other greenfield expansion opportunities. This plan's principle of encouraging densification close to employment, services and quality public transport will also apply in greenfield areas." It is very important that this approach is adhered to for any greenfield development that occurs, along with the requirement that developers fund necessary infrastructure in greenfield areas (p. 26) to ensure sprawl is not being subsidised.

*"Urban sprawl, defined here as the uncontrolled and excessive spatial expansion of cities, is one of the world's most significant – and least well documented – market failures, leading to inefficient use of land, capital and other resources. [...]"*

*"Despite a range of real and perceived benefits of more sprawled development to private individuals and developers, such as larger house sizes and some cost efficiencies in house-building, a review of the evidence for the Commission report suggests inefficient sprawled development at least doubles land used per housing unit, increases the costs of providing utilities and public services by 10–30% and sometimes more, and increases the costs associated with travel by 20–50%."*

*"Sprawl also tends to be unfair, since lower-income people, who rely more on walking, cycling and public transport, are less likely to benefit from the additional road infrastructure, for example, but still pick up the bill in higher utility and public service costs. Although there is some evidence to suggest that sprawl can increase housing affordability, this is typically more than offset by the increase in transportation and public service/infrastructure costs (e.g. water, waste and sewage). [...]"*

*"Estimates for the United States suggest that transit-oriented urban development could reduce per capita car use by 50%, reducing household expenditures by 20%."*

*[Better Growth, Better Climate, Chapter 2, pp. 10-11.]*

#### 4.2 Transport choices

We strongly endorse the proposed transport system hierarchy presented on p. 42.

As discussed above in Section 3.2, we are concerned about the apparent lack of an implementation framework and have proposed some ideas to help ensure the hierarchy is followed in practice.

At face value, we cannot accept that the current transport plan being pursued for Wellington reflects the proposed hierarchy. Most prominently, by supporting the Roads of National Significance projects, which would dominate Wellington's transport developments with the primary effect of making private vehicle travel through the city easier, the Plan seems internally inconsistent. Focusing on leveraging "maximum benefits for the city" from the RoNS projects is laudable, but in our view Council needs to be honest that the RoNS are at odds with the Plan's vision and objectives and the desired transport system hierarchy, and advocate for plans that are consistent with these.



Putting aside the RoNS and focusing on spending and projects over which the Council has direct discretion, while applauding the good progress that has been made recently (particularly in cycling), we believe much greater effort is needed to ensure that the Council's overall plans align with the hierarchy proposed in the Plan.

#### 4.3 Parking

While there is a general indication in the Plan of "managing parking more efficiently" and balancing on-street car parking against other uses, we feel the Plan is overall quite soft and unambitious in its vision, aims and actions around reducing land requirements and road-space allocated to car parking.

We would like to see the Plan express a clear intent to *reduce* the amount of parking - at least in the central area - in favour of more productive use of land and public road-space. The current Parking Policy (2007) notes that "the total number of parking spaces available, both on-street and off-street, is high compared with other similarly sized cities."<sup>3</sup>

Further, we would like the Plan to recognise that parking provision is not just a response measure to people's transport decisions but a *lever* that influences those decisions. Provision of free or subsidised parking, and regulations requiring excessive parking allocation, are often over-looked factors which distort people's choices in favour of low-occupancy private car travel (thereby damaging the economy and environment).

One concrete action that should be taken is to remove minimum parking requirements to allow developers the freedom to decide what is appropriate. This is essential to avoid (1) over-provision of parking leading to perverse transport outcomes, and (2) barriers to the affordable higher density and infill development the Plan seeks.

In the immediate future, reopening of the James Smith and Reading car parks should be used as an opportunity to strategically reallocate on-street parking in the vicinity for other uses such as protected cycleways and bus lanes.

Reduction in space allocated to parking can be achieved while improving current services through innovation. The Council should investigate new technologies to optimise parking efficiency, for example through "performance pricing".

In particular, we strongly support the widespread roll-out of a car share scheme (p. 50), as we have advocated for previously.<sup>4</sup> Research on implementation in the United States and Canada found that car share members reduced the average number of vehicles per household by half, and each car share vehicle deployed has taken an average of 9 to 13 vehicles off the road.<sup>5</sup> Other research found that car share members increase their usage of public transport, walking and cycling, and reduce their average car travel distance by 40%.<sup>6</sup> Council should take a positive and proactive role in

<sup>3</sup> Wellington City Council Parking Policy, September 2007, p2.

<sup>4</sup> Generation Zero (2013), Fast Forward Wellington, [www.generationzero.org/fastforwardwellington](http://www.generationzero.org/fastforwardwellington)

<sup>5</sup> Martin, E. et al. (2010). Impact of Carsharing on Household Vehicle Holdings: Results from North American Shared-Use Vehicle Survey.

<sup>6</sup> [http://spark.govt.nz/wp-content/uploads/carshare/Impact\\_of\\_Carsharing\\_on\\_Household\\_Vehicle\\_Holdings.pdf](http://spark.govt.nz/wp-content/uploads/carshare/Impact_of_Carsharing_on_Household_Vehicle_Holdings.pdf)

<sup>7</sup> <http://sustainabledevelopment.un.org/content/documents/146642pcar.pdf>



facilitating growth of a car share scheme (or schemes) and conduct an immediate review to investigate any regulatory or other barriers that currently exist.

**5. Concluding remarks**

We thank the Council again for the opportunity to comment on the draft Plan. We support the intentions of the Plan and agree it can be a catalyst for positive change. We look forward to further opportunities to engage in the future.

ERG Feedback on the Draft Wellington Urban Growth Plan (Draft WUGP)

13 October 2014

**Summary**

Feedback from the ERG generally focuses largely on omissions within the document, and a general concern that growth of the magnitude proposed is unlikely to be consistent with the Council's stated commitments to '...preserve the city's character' and that '...the quality of our natural environment is maintained and enhanced'.

Feedback falls within the following themes:

1. The WUGP is presented for review as a 'stand-alone' document, with passing reference to the Long Term Plan and complementary strategies for economic development, environment, social and recreation facilities, and governance. This makes it difficult for the reader to appreciate how WUGP content fits within the wider strategic framework, or to determine whether detail not evident in the WUGP will be available via corresponding documents.
2. The population growth analysis appears relatively limited, and the proposed strategy entirely reactive. In particular:
  - a. There is no background provide to the estimated 50,000 (25%) population growth in 30 years, or commentary regarding its error bounds or underlying assumptions. We appear to be embracing a 'growth' without seriously questioning whether it is what is best for Wellington, asking whether Wellingtonian's want it, or questioning whether it will enable us to, as claimed, '...preserve the city's character'.
  - b. There is no commentary regarding whether the Council has decided to simply plan to accommodate the estimated population growth, or plan to constrain such growth. This is significant, rapid growth, which has the potential to substantially change Wellington, and is unlikely to be the promised 'low-impact urban development'.
3. The scope is understandably limited to the Wellington City district, but commuter networks and remote working enables people from outside the district to contribute toward Wellington's economic performance (although admittedly they will not pay rates). There is no analysis of whether the same economic growth objectives could be achieved by maintaining Wellington as a QUALITY destination which draws talent living in surrounding districts from the region.
4. There is little mention of the development potential offered by low grade land in the CBD, such as the rail yards, port, vacant lots, earthquake prone buildings (e.g. car parks) and other such areas.
5. Available space for development is limited. If we need to 'keep the city compact', at what point will the Council need to consider compulsory purchase to ensure intensification and infill developments are optimized? Is this a likely scenario, or will development proceed along a path of least resistance?
6. Transport choices could include greater consideration of how to reduce the number of private vehicles from entering urban centres (e.g. park and ride schemes).
7. It is assumed that development incentives are required, with no formal justification, or consideration of alternatives.

8. It would be good to see clear linkages made to other relevant strategies (e.g. the biophilia strategy).
9. There is insufficient detail regarding WCC intentions regarding preparation for (and response to) sea level rise. This is surprising as it represents one of the more significant issues impacting on sustainable urban development in Wellington.
10. The focus is on a handful of large development projects focused on Wellington and Johnsonville CBD areas, plus a northern link road and works around the airport. There is no acknowledgement of the potential benefits that can be achieved by multiple minor improvements that can be implemented around the remainder of the District.

As the WUGP will be Council's "primary guide to decisions that relate to planning, growth, land use, housing, transport and infrastructure", it is essential that it is done well. A document of this nature should therefore be comprehensive in scope, appropriate detail, clarity of what is fact and what is assumed, and sets direction with consideration of stakeholder preferences and robust cost-benefit assessment. It is debatable whether the current document satisfies these criteria.

The draft WUGP falls well short of what would be expected for a document of this significance. As significant work is required to address the issues raised, it is hoped that the ERG will have the opportunity to comment on a subsequent, improved version of the WUGP before it is presented to Council in its final form.

Given the significance of the WUGP and the extent of our comments, the ERG would welcome the opportunity to present to Council regarding the above. In the meantime, the following provides more detailed comments.

#### **The City Now**

Council appears to have started with a predetermined position – it has not taken the opportunity to seek views on different growth targets or alternative growth strategies. Residents who have seen their quality of life decline over the last 15-years as the population grew from 170,000 to 200,000, may be concerned to learn that another 50,000 people are expected to live here after another 30 years, i.e. an increase of 80,000 people, or nearly 50% in 45 years.

Statements such as "To encourage development, we need to provide incentives, ensure supporting District Plan provisions etc", raises warning flags about the mindsets that drafters and decision-makers will bring to the review of the District Plan. (p.36)

More people may find the graphic on page 15 more informative if population figures were added to the circles in the left hand column to save readers having to do their own calculations. Please state the area (in hectares) used to calculate the densities, and clarify whether it includes all the rural land to the west of the urban areas, thus lowering the average/perceived densities.

The current draft has given little attention to the "people-centered" theme in Wellington 2040 Smart City, or to the potential social implications of the growth strategies. Some examples follow:

- Part of the current quality of life in Wellington is that it is easy to walk around the central city one. That may change if thousands more people live in the central city, and thousands of others converge on the central city each day for work. Footpaths are already congested in January, and the congestion is worse on those days when one or two large cruise ships are

in town. People are likely to report feeling crowded and irritated as congestion increases, walking paces are determined by other people, and it takes longer to get to meetings and appointments. Stopping for a chat on the street will become more difficult. Over time, the pedestrian equivalent of 'road rage' may emerge.

- Any increase in the number of elderly people living in flats in the CBD may result in more people using mobility scooters on city footpaths. What proportion of the footpaths are wide enough to allow mobility scooters to overtake or pass safely?
- Council expects 25% of new housing to be low density, 35% medium density, and 40% high density. These terms are not explained. There are already 10,412 people in Te Aro, and this forecast to grow to 19,647 by 2043. Does that represent a shift from medium density to high density, or is Te Aro already high density? Areas that are currently compact may in future be described as crowded and congested, and future slums.

The aging population of Wellington has been identified as an issue for many years. The UGP provides an opportunity to start working through the implications in more detail. More sophisticated analysis may be a useful first step. The left hand circles on page 15 treat all people aged 65+ as one category. In reality, the needs and aspirations within the 65+ age groups may be quite different. One option would be to separate the 'young old' (65-75) where work force participation rates are like to increase, from the 'mid old' (75-85) and the 'old old' (85+).

#### Infrastructure

This section contains no information about the current state of the infrastructure, particularly the condition of the three waters infrastructure in the areas identified for transformation, e.g. Adelaide Rd, Te Aro, Thorndon, which are some of the oldest parts of the city and where some assets are probably overdue for replacement. Moreover, the section commits to keeping pace 'with the city's population growth'. This would appear to link future capital investment to the category 'to meet additional demand' in the Annual Plan, and not to the 'replace existing assets' category which would result in upgrades of infrastructure in other parts of the city.

The Carbon Dioxide data appears to refer to the region and not the city. We would expect Council to use the city-based data that is being collected as part of tracking progress towards the targets in the Climate Change Action Plans.

#### Natural Environment & City Resilience

The reference to sea-level rise includes 'Climate change impacts and the predictions of more severe weather events and sea-level rise will have ramifications, particularly for low-lying coastal urban areas'. Looking ahead to the city's resilience in 2043, it addresses this issue as follows:

- Investment in buildings and key infrastructure, and the adoption of new urban development approaches and new technologies, mean the city's built form and transport is increasingly resilient to natural hazards and the impacts of climate change.
- Land use and development in areas most at risk from the impacts of natural hazards and climate change is managed to minimize the risks to people and property.

It's not clear what this means, but suggests that this Council proposes to continue with intensification in Kilbirnie and low-lying parts of the central city despite the latest SLR scenarios for Kilbirnie. Whilst these consequences may not eventuate before 2043, shouldn't Council be taking a longer term view about resilience and infrastructure investment?

Consider the following rewording for p61:

**PROJECT**

Design for the future impacts of climate change in urban development planning including predicted increased summer temperatures, prolonged droughts and episodic high intensity rainfall events.

**ACTIONS**

Ensure that the principles of WSUD are applied in all new (and retrofit) developments to manage urban heat island impacts, microclimate and resilience to water stress. Develop sustainable water management practice to provide non-potable water sources (rainwater/stormwater) for irrigation of public open space.

Consider the following comments for p62:

Several actions are identified in the section on page 62 "Enhance our existing natural environmental assets" which signals Council's intention to "support the development of open spaces and track connections in strategic locations that align with the growth framework".

Early development of the Watts Peninsula Reserve will provide a valuable open space to support the Kilbirnie growth area. Perhaps the UGP could also identify priorities for new parks and reserves in the central city, Adelaide Road area, and the various northern growth areas?

Several actions are identified in the section on page 62 "Enhance our existing natural environmental assets" which signals Council's intention to "support the development of open spaces and track connections in strategic locations that align with the growth framework".

Proposed action	Comment
Develop new central city parks to support the central city's increasing population density and provide multiple benefits in terms of amenity and function (integrated WSUD).	New parks throughout the central city will provide green spaces for the additional residents as well as workers who may want to eat their lunch or drink their coffee outside.
Implement the Suburban Reserves Management Plan	Several reserve management plans have implications for the growth framework, e.g. Northern Reserves Management Plan, Town Belt Management Plan, Outer Town Belt Mgt Plan, Open Space Access Plan.

Consider the following rewording for p63:

- Minimise the impact of development on receiving environments, including fresh and marine waters-work with partners to deliver strategic programs to reduce pollutants (including

sediments, heavy metals, hydrocarbons, nutrients and sewerage related contaminants) in the city's water systems.

- Low impact and Water Sensitive Urban Design – strengthen requirements for integrated water sensitive urban design and sustainable building principles in all new subdivisions, building developments and retrofits including exploring how urban infill can mitigate existing water management issues. Integrate low impact and water sensitive urban design solutions into the Council's Code of Practice for Land Development to provide solutions which are appropriate for Wellington's climatic, geological and topographical context. Investigate how to embed water sensitive urban design principles into the District Plan, with particular emphasis to those areas identified as Special Housing Areas.
- Work with Iwi to deliver water management solutions which are considerate of cultural sensitivities and respond to the principles of the Treaty of Waitangi and respect their aspirations for water management.

We are concerned with the loss of green space from higher density urban and suburban areas. MDRA zones have been introduced (and are set to be extended further) without mitigation of their negative impacts on intrinsic natural character and resident access to green space. For example, Section 32 analysis of the introduction of MDRA to Johnsonville in 2010 recommended the creation of new pocket parks (green space deficiency was highlighted as a risk to the zoning change), yet that recommendation was excluded from plan changes. Since MDRA was introduced, green space & play areas have been reduced at Alex Moore Park, Johnsonville memorial park and the "half-court".

Poor access to green space compromises resident's health and wellbeing, so we encourage WCC to consider the significance of green space when creating MDRA areas, and to use pocket parks to offset the adverse effects of suburban intensification where appropriate.

We support greater protection of existing green spaces in suburban areas earmarked for targeted residential intensification - for example, a moratorium protecting existing green space, and their extension wherever possible (ie, where Road reserve can be used for public greening, it should be used as such and not divested).

A higher level of service provision in terms of children's play areas would be appropriate, in order to mitigate the loss of private outdoor space in MDRA zones, and to make them more desirable for people to live in (and so more attractive for developers to build MD dwellings).

#### Performance measures

We support the intention to develop effective monitoring and review processes, and would like to contribute toward the development of indicators and setting of performance targets. Attention to unintended consequences associated with uncertainties and risks, will also be required.

#### **Note**

Paula Warren and Peter Gilbert of the ERG have already provided a submission via the WCC website, which comprised the following:

A. Transformational Growth Areas

This section should have some clear principles that would determine whether an area should be a growth area, and then identify some that meet that test now. That would help with prioritization and leave open the option of adding further areas in future as context changes.

The port precinct one should be focused on rail links for freight, not road links - there is now serious work on an inland port near PN, and a log transfer facility in the Wairarapa, and those should be supported as a way to reduce truck traffic in the city and costs for freight. Wiri inland port has been so successful that it is being expanded.

#### B: Liveable and vibrant centres

A clearer description of what a livable and vibrant centre should look like is required, which would also enable effective monitoring to determine whether development objectives are achieved. For example, the phrase "street improvements" is vague (improvements for what and who)?

The draft does not sufficiently consider the development of more distributed commercial activity, particularly located in suburban centres. The benefit of people working closer to their homes would include reduced commute times, changes in preferred transport modes, reductions in carbon footprints and more time available for personal recreation, family and community activities.

#### C: Real transport choices

Good to see the hierarchy formalised. The plan to encourage and prioritise walking, cycling and public transport over other modes of transport is to be commended.

It would be good to see an outcome statement in terms of which mode for which types of trips and modal share. Or if that isn't acceptable, exactly what kinds of shifts are desired.

The GHW is more than cycling/recreation, as it will support modal shift to walking and cycling for commuting/shopping journeys, if well integrated with PT.

The section on the walking policy looks like a review of implementation, rather than making significant improvements. It would be good to articulate some of the key ideas (e.g. a high quality fast walking route between all fringe suburbs and the CBD, that all new facilities would meet the pedestrian facilities guidelines where that is feasible, and progress would be made in retrofitting existing infrastructure to achieve the guidelines, that crossing delays would be reduced to "good" that we get more kids walking to school and reduce school traffic (currently 30% of city traffic roughly), etc.

It would be good to see a clear commitment to providing a dedicated PT route through the golden mile and taking actions to ensure that all RTN and QTN services are unimpeded by fixable traffic issues.

The lack of loading zones and bookable parking spaces for tradespeople exacerbates illegal short term parking (on the footpath), and should be considered as a priority when allocating road space.

Although RONS, Transmission Gully and Petone-Grenada are mentioned, the Hutt Motorway between Ngauranga and Petone is not. The straightening of this section of road, the building of a cycle lane and a walkway, and the straightening of the railway, with protection from storm surges, are all overdue.

The adequacy and location of commuter parking requires more serious consideration and integration into road improvement planning (e.g. it is not sufficient to simply say that "locations such as Johnsonville Train station are important").

**D: Housing choice and supply**

Homelessness requires greater attention, particularly for vulnerable groups that currently have particular difficulties finding suitable and affordable housing. Although there is mention of affordability, there is no mention of social housing and homelessness. It is a serious issue that has an overriding impact on people's health, jobs, education, and family life, and it cannot be ignored.

**E: Natural environment**

It is important to consider green growth and the green economy in this context, to broaden the debate from a simple development versus environment dilemma. Creative economic development can be done hand in hand with environmental improvement (e.g. water sensitive urban design can deliver biodiversity gains, while street improvements can encourage walking, stimulate adjacent businesses and improve amenity values).

Would be good to specify specific outcomes that are to be achieved in the period (e.g. mapping of the piped stream network within the central city, to raise awareness and reduce further loss).

**F: City Resilience**

This seems to only cover what happens in seismic events. However, resilience comes in many forms (food security, financial stability, community support, adaptation to sea level rise, economic diversification, security of water supply etc.)

Little discussion is given to the effects of predicted climate change on urban land-use. Given the topography of the city, sea level rise is likely to have huge implications in the future. Retreat from, rather than protection of, some foreshore assets seems inevitable and yet the prospect of this future displacement is not clearly signaled or discussed in this plan.

NIWA is predicting (at a moderate confidence level) heavier and/or more frequent extreme rainfall events (Climate change effects and impacts assessment A Guidance Manual for Local Government in New Zealand – 2nd Edition P32). Rapid increases in annual exceedance probabilities (AEP) for storm events, raises the likelihood of significant failures in the Wellington's 550km stormwater network, the bulk of which was designed for much lower AEP design values. Explicit planning for land based Water Sensitive Urban Design (WSUD) solutions need to be incorporated into urban developments, green spaces and transport corridors on a citywide basis, not just in new growth areas.

**G: General or other comments**

The general intent of the document appears to be admirable, but there is considerable scope for interpretation that means it is hard to be sure that it will have a positive effect on the environment.

Consideration should be given as to whether the document should be focused on principles or outcomes or projects. The ERG preference would be outcomes.

It needs to be clear in the document when numbers used are actual projections or Council preference.

There should be a clear reflection of what the groups asked for in the LTP discussion - growth that reinforces/delivers on what residents value about Wellington, to reduce the potential to make changes that have negative outcomes for the community.

The section on reducing the city's carbon footprint needs greater clarity. Will the targets of 30% and 80% reduction still stand with the projected 20% population growth? How does this plan explicitly prepare the city for a low carbon future?

Creating incentives to stimulate development (P37) needs to be handled by a fully accountable and transparent process. If reduction of Council's development contribution requirements are going to be used to encourage developers, then any deferred or externalised costs need to be fully accounted and provided for in the WCC planning and reporting processes.

# Wellington City Youth Council

## Submission on the Draft Wellington Urban Growth Plan

NOTE: THE YOUTH COUNCIL WISHES TO MAKE AN ORAL SUBMISSION

Further Contact: Oliver Michie, Member, Wellington City Youth Council  
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### Introduction:

The Wellington City Youth Council (Youth Council) welcomes the opportunity to submit on the draft Wellington Urban Growth Plan.

### Priorities

The Youth Council supports the areas of growth that the Council has prioritised. We see the Adelaide Rd growth proposal as one to mimic the Victoria St proposal, as a boulevard type street. We believe that having a cheap, fast and reliable public transport system is key to growing the inner city, and therefore the local economy. This is because it will make the inner city more attractive to live, in terms of amenities. The Youth Council would like to see the development of inner city lane ways, as we believe that they are a way to strength city's culture, and make Wellington a place where talent wants to live. We want to see Wellington continue to be the vibrant and cultural capital it is today. We see this being achieved through development of the Waterfront, making it a destination by including green spaces, and having sensitive development in the area, meaning no massive builds. The Youth Council wants to see Wellington as a diverse and social city, which attracts talent to live, work and play here.

### Key Outcomes

The Youth Council wants to make sure that the Eco City priorities, set out in the Wellington 2040 document, are made a priority in urban growth plans, as it is important that we protect our environment and use it as a positive space to socialise. These inner city green spaces are important to Wellington's diverse culture. We believe supporting the outer belt is a key part of this. The Youth Council supports suburban development, but only to a minimum. We do not want suburban Wellington to lose its unique culture, where they are safe and friendly. If people want to live in apartment, they should live in the city, not a suburb, as there are many benefits for those wanting to live in the city including that you do not pay for transport as you are close to amenities, and that the city is very walkable. As our city is very walkable, it is important that the inner city is pedestrian friendly.

On the issue of public transport, the Youth Council notes that the majority of young people rely on public transport to get around, as they do not drive. It is therefore important that there is a choice in public transport that is cheap, fast, and reliable. The Youth Council believes that more consultation with the Greater Wellington Regional Council is necessary to achieve this.

As Wellington is highly prone to natural disasters, especially earthquakes, it is important that city resilience is made a priority when planning growth. The Council needs to make sure that they put an emphasis on resilience, make sure that all buildings of urban growth meet earthquake standards, and that inhabitants are well informed of what they need to do in a disaster. The Council also needs to have a wider plan for the entire Wellington City district to ensure that smaller communities can stay safe during a disaster.

Housing affordability for young people (tertiary students and above) is a highly important issue for the Youth Council. Not only do young people have to pay for their study fees and other living costs, they need to find a place to live. Whether that be provided by a tertiary institution, a flat, or a house, they all cost a lot of money. It is therefore important the Council work to provide low-cost housing for young people. These do not have to be 4 bedroom, million dollar houses. All they have to be is enough to accommodate a young person, only 1 or 2 bedrooms, built to a high quality so it is warm, dry, and earthquake proof. This is highly important for, not just the wellbeing of current young people living and studying in Wellington, but for attracting new young people to come to Wellington to live, work and study.

#### Conclusion

In conclusion, the Youth Council supports the general concepts of the Urban Growth Plan, and the area prioritised for growth by the Council. We wish the Council to ensure it will implant the Eco City priorities, put an emphasis on resilience, and ensure that there is affordable housing for young people. We want to see Wellington continue to be a vibrant and diverse capital which attracts people to live, work and play here, which will help grow the local economy and enhance our wonderful culture. It is therefore important that the Council plans to accommodate further population growth.



**Submission from Living Streets Aotearoa - Wellington  
Wellington City Council Draft Urban Growth Plan**

Contact person: **Mike Mellor**  
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Phone: **027 684 1213**  
Date: **13 October 2014**

**Submission**

1. We support the improvements listed on pages 39, 41 of the document.
2. The transport hierarchy on page 42 is excellent, but the rest of the document needs to be reviewed for consistency with this.

For instance:

- a) on page 31 there is as reference to "major roading improvements" for Johnsonville, but nothing about other modes;
- b) re Adelaide Rd, page 36 says "roading, public transport and cycling improvements" – the wrong order, and with no mention of the highest-priority road users;
- c) on page 44, transport priority 1 is cycling, with transport priority 2 on page 47 being walking – clearly the wrong way round;
- d) on page 44 it says "where facilities are shared by pedestrians and cyclists, we will endeavour to provide a safe alternative route for faster cyclists", but there is no mention of safe alternatives for slow (or any other) pedestrians in such circumstances.

And the diagram looks to be the wrong way up, with cars at the top and pedestrians at the bottom!

3. We note that the Transport in Wellington map on p43 does not include the Great Harbour Way, nor improvements to the public transport interchanges at Johnsonville, Wellington Station and Kilbirnie, all mentioned elsewhere. We also note that it includes Miramar public transport improvements, but GWRC's Regional Public Transport Plan is proposing to cut bus services to Miramar by up to 50%.
4. The heading on page 44 is "Make Wellington a better city for cycling", so similarly the heading on page 47 (re-ordered to be section 1) should be "Make Wellington a better city for walking", with standards for pedestrian priority, such as:

- a) improvement to traffic light phasing to a consistent level of service - currently pedestrians wait longer than other traffic and often have only a four-second green cross signal;
- b) maintain the dedicated pedestrian network to encourage more walkers, and remove all vehicles and vehicle parking from footpaths (WHO checklist for age friendly cities - see great discussion on Wellington demographics);
- c) give pedestrians priority in suburban centres and in the CBD;
- d) work with pedestrian groups to support and extend walking;
- e) provide more vehicle free spaces for peaceful use by walkers;
- f) update the walking policy to reinvigorate initiatives to increase mode share and commit to using the NZTA Pedestrian Planning and Design Guide;
- g) turning more streets into no-exit streets for vehicles, such as those on leading into Jervois Quay (as has happened with Bond St at Willis St);
- h) closing Lambton Quay as a through vehicle route (except buses);
- i) adding signage to all those many streets that say "No Exit" that are through routes for pedestrians to show that they do have exits, just for people, not vehicles;
- j) measures for improvement should include an increase in walking mode share (eg by 10%), and a reduction in the number of pedestrian deaths and injuries;
- k) letting cyclists share pedestrian space only as a last resort, and only when all guidelines for shared paths are met.

5. Since public transport users are part of the active transport network, we support the public transport initiatives, in particular:

- a) the need for electric buses, which exist already but which GWRC proposes to scrap long before the end of their useful life. WCC-owned overhead equipment is currently being upgraded to the best condition that it's been for the last 30 years (source: Jacobs report to GWRC);
- b) improving the woefully inadequate wayfinding, signage and other information at the Wellington Station interchange;
- c) improving pedestrian access from the front of Wellington Station to Featherston St and Jervois Quay, including pedestrian priority at the station's main pedestrian entrance (it's absurd that cars have right of way here) and across Bunny St;
- d) improving bus shelters and bus stops so that shelters do just that; and shelters, stops and bus stop boxes all align so that drivers stop and passengers wait, sheltered, in the same place.

6. Re the road network, WCC needs to work to reduce the demand for car traffic, not just "to better facilitate the movement of vehicles from the north... to Wellington Airport". Facilitating such traffic erodes the modes at the top of the hierarchy to the benefit of the mode at the bottom. We disagree that the NZTA-led RoNS programme is "focused on moving people and freight safely and efficiently" - it is focused on moving vehicles, often to detriment of other, higher-priority users, such as the resultant major increase in congestion forecast in Greater Wellington's TN24 report, the relative reduction in Kapiti Line rail users and increase in car users caused by Transmission Gully, according to NZTA figures; and the increasing difficulty for all road users, but particularly pedestrians and cyclists, presented by crossing Karo Drive.

7. We support parking being reviewed in the light of road space allocation, and note that buses bring in 34% of residents (page 24) but use just one lane through the CBD plus three shared with general traffic, while other traffic has access to 14 lanes - this balance needs redressing in terms of the proposed hierarchy. We support parking to support public transport only as a last resort - emphasis should be on access to public transport in accordance with the proposed transport hierarchy, i.e. pedestrians first, cars last.

8. The green-field growth areas should be a last priority for development, after the other areas. They are not compact development, and rely on the very expensive and disruptive Petone to Grenada road. It is not clear how these developments can be consistent with a policy that rightly puts active and public transport before car use.

9. Finally, our 2009 submission on Wellington 2040 was as follows: we believe that it is still as relevant to this consultation.

*Living Streets Wellington would like to see Wellington in 2040 meeting the goal of our organisation – more people choosing to walk more often and enjoying public places.*

*This would mean that Wellington 2040 would have fantastic walking routes to all parts of the city, with well-connected public transport connecting the walkways. Children and adults of all ages and abilities would be out on the streets walking to and from their daily activities, socialising, keeping healthy and caring for their environment.*

*This would mean that there were well designed footpaths for pedestrians to stroll and speed walk/run along, and easy places for pedestrians to cross over the vehicle-paths. There would be a variety of walking environments from urban macadam (Golden Mile) to natural surfaces (Mt Victoria town belt or Hataitai to town walk) that are well signposted.*

*Schools and child care centres would be at the hub of well-connected walkways with high volume pedestrian traffic along them (e.g. the Basin Reserve with its 3 large secondary schools and 2 primary schools would look like a child-pedestrian friendly place and not a car speedway).*

*Pedestrians and public transport would be the priority along the entire Golden Mile, which would encourage continued strong economic activity in the CBD.*

*Suburban centres would be designed for pedestrians, connected to their suburbs by walkways and public transport, and would feature high quality public spaces for recreation and socialising.*

*The wonderful waterfront would be easily accessible from the town side and walkable all the way down to the interisland ferry, with clear signposting of key destinations along the way (replacing the current notices for cheap vehicle parking). This would be the core of the Great Harbour Way, extending from Pencarrow to Red Rocks.*

*The transport system would be treated as an integrated whole to first serve the access needs of the people of Wellington – with public transport and walking infrastructure well integrated and ubiquitous. Active transport would be favoured over passive private modes, with a range of incentives to get people onto their feet (including pricing). Pedestrian ease rather than vehicle congestion would be a key indicator of transport success.*

*Innovative solutions would ensure that households could meet all their needs without car ownership, including by access to car-share schemes.*

*Wellington would be known as the walking capital.*

*We would like to be heard in support of our submission.*

#### **About Living Streets**

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

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The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: [www.livingstreets.org.nz](http://www.livingstreets.org.nz)

ENCLOSURE



## GHW Submission on Draft Wellington Urban Growth Plan

The Great Harbour Way Trust promotes the Great Harbour Way/ Te Aranui o Pōneke (GHW), a walking/cycling route around Wellington harbour.

As well as providing recreational and tourism opportunities, the GHW is a commuter cycling and walking route, for example from the Hutt valley and from the Eastern suburbs. It provides linkages from Wellington City and transport interchanges to the Rimutaka Cycle Trail, one of the Nga Haerenga NZ Cycle Trails. One of the features of Wellington as a liveable city is the ability to walk and cycle along the harbour shoreline.

We are pleased that the Plan aims to "deliver" the GHW (p44), by providing a continuous cycle route from Lower Hutt to the City (p24), facilitating access from the port area to the GHW (p37), Integrating cycling into the Miramar Peninsula (p.44), and upgrading the GHW between Point Jerningham and Scorching Bay (p.58).

To reinforce these aims, we suggest:

- WCC works with NZTA and other relevant authorities to as soon as possible construct a high quality walking and cycling path on the seaward side of the rail line between Petone and Ngauranga, and works with Hutt City to ensure that there are efficient connections between the path and the GHW to Eastbourne, and to the Hutt CBD.
- Safe and efficient separated cycle and walking routes are constructed between Ngauranga and the Wellington Waterfront.
- The Wellington Waterfront continues to be a shared route for cyclists and walkers, and that cycle lanes be provided on Customhouse and Jervis Quays for fast commuter cyclists.
- Cycling routes around Evans Bay be upgraded, and made continuous.
- Vehicle speeds on the Miramar peninsula should be restricted by regulation and by engineering to make walking and cycling a pleasant experience.
- Massey Road between Shelly Bay and Scorching Bay be closed to motor vehicles on Sundays, so that cyclists, walkers etc can enjoy this part of the GHW as a motor free environment. In February 2014 almost 2500 people took advantage of the route being motor free, which indicates that this should happen on a regular basis.
- On the south coast, footpaths should be widened to allow for shared use, and vehicle speeds restricted by regulation and engineering.

Regards

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## Wellington Civic Trust

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Wellington Urban Growth Plan  
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Received 13/10/2014

This is our contribution to the Wellington Urban Growth Plan (UGP) released last month for comment. The UGP is a positive plan which we generally support, as to details, we will as in the past contribute to public submissions on the various stages and projects as these come forward for decision. For now we hope that these comments on principles (with some practical examples) are useful:

1. Smart Capital 2040 remains a sound strategy for Wellington and the UGP outlines more detailed steps towards realising it. 2040 is one of many programmes (listed on p.12) contributed to; but it deserves to be more actively refreshed, developed and progressed as a main reference point. Don't let it drift off into a sea of acronyms and lose its significance.
2. Collective and/or collaborative action with the other council (GWRC) and with the Crown (e.g. NZTA) is central and essential to Wellington's urban growth. If anything, the Draft UGP under-states the amount of collective work outside of WCC which will need to be involved. There is every reason for the WCC to show leadership and to draw such external parties into the work from an early stage. Two recent examples demonstrate this need:
  - (i) the mismatch in recent years between the WCC street improvements in Kilbirnie and the GWRC bus service stops in that area could be symptomatic of a wider problem when implementing the UGP.
  - (ii) The recent example (Basin Bridge) of the WCC's declared wish to remove SH1 from Vivian St being simply ignored by NZTA does show the realpolitik of this, but it should strengthen the resolve of WCC to take a more assertive leadership role in advancing the city's interests. "Real Transport Choices" (p.42) is a good statement but it does rather understate the needs for freight (which seems to be the main Crown interest). Wellington is the inter-island transfer point and the tensions that this role bring for a growing city population will require a much more determined approach by WCC than just "working with" others.

> to next page >

3. A high standard of urban design, of landscaping and of architecture is a standard assumption. It would add value if the UGP were strengthened by explicitly including this as a consistent intent. This is not just about aesthetics or about more costs not connected to direct benefits. In fact, more sophisticated design becomes a necessity in mixed-use, high density environments in order to enable them to function efficiently. With intensification, Wellington can anticipate a greater efficiency in the delivery of services and a more vibrant and creative environment for both residents and visitors. With the integration of mixed uses and a more immediate relationship between living and working environments, and between public and private outdoor spaces, good design at all scales becomes critical. High quality design would become a distinctive and intrinsic characteristic of Wellington's urban growth. Two examples are:

(i) p.37 #2 "Contribute to Port Access Plan" describes improved access to the working port for people and freight. With imaginative design, this can achieve considerable "amenity benefit" at Wellington's "Northern Gateway" as well as the desired "improved access".

(ii) p.39 #3 "Parliamentary precinct" - Wellington is New Zealand's Capital City and this can be reflected and celebrated by appropriate design quality.

Our October 18th Seminar "Avenues and Oases" - for which we acknowledge and thank the support of the WCC - is part of a wider "civic conversation" which we believe will raise further ideas to contribute to the urban growth and prosperity of Wellington.



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9 October 2014

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**Re: Draft Wellington Urban Growth Plan**

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

**Introduction**

1. Overall the Architectural Centre supports the Draft Wellington Urban Growth Plan.
2. We do not however support greenfield development, and consider that redevelopment of existing sites, and building on brownfield sites and infill sites within the city, especially along the growth spine, have sufficient capacity to accommodate increased population growth. We also believe that increasing Wellington's population density will be beneficial to the city. We believe that the council's proposal to encourage development on greenfield sites, including "completing a stocktake of other greenfield expansion opportunities" (p. 55) to be a complete contradiction to an apparent commitment to retain Wellington as a compact city (pp.10,19).
3. We find a similarly significant contradiction exists in relation to the document's assertion that the council's plan is to "encourage and prioritise walking, cycling and public transport over other modes of transport" (p. 43), and the transport strategy "recognises in priority order: pedestrians, cyclists, public transport, moving freight and private vehicles" (p. 50). Yet the document seemingly winces at the possibilities to rebalance the current roading infrastructure to materially achieve this stated hierarchy, and instead states that there needs to be "improvements for private vehicles" (p. 37). The continued prioritising of cars over pedestrians and cyclists also seems apparent to us in the Island Bay Cycleway proposal, which maintains the secondary importance of pedestrians and cyclists to the point that footpaths are narrowed and the cycle route is less direct. These suggest to us that the council needs a significant shift from its current mindset into order to meaningfully achieve this council policy.
4. We acknowledge that many of the relevant issues are interconnected and overlap, and, while we have aimed for clarity in our section headings, we do caution readers that a straightforward categorising is not really completely achievable.
5. Our comments below address the broader over-arching aspects of the Draft Wellington Urban Growth Plan and also introduce a number of very specific proposals (e.g. an inner city shared space network, encouraging tidal power as a sustainable energy source, and implementing an affordable housing provision) which we think could be good vehicles for achieving higher level objectives.



#### Population Density and Growth Spine

6. We are surprised that it is anticipated that there is only to be an additional increase of 50,000 people living in Wellington over the next 30 years, and would encourage the city to work harder at increasing our population. We consider that Wellington needs to increase its population density more and sooner than the predicted numbers, to both increase the city's economic viability, and to also enjoy the cultural vitality and lifestyle benefits of greater urban density. We currently have a very low population density in contrast to many cities which we might look to as models for our urban environment (Table 1).
7. We strongly support the council's aim to "encourage growth in areas close to services, employment and good public transport" (p. 10). We also strongly support the intention for Wellington to be a compact city, containing development within the city's existing urban limits (pp. 10, 19), but we can also see the need (as Wellington's population increases) to provide more inner city recreation spaces. While the town belt is our city's "Hyde Park", a series of inter-connected urban playgrounds, and public spaces, and places will also be needed. Celebrating the intersections of streets (such as London's Seven dials) might be one way to create new place identities and increase the urban depth of our city. Interior as well as exterior public spaces could be considered, but both need to be well designed to ensure use and longevity.



Figure 1: London's Seven dials

8. We do not support greenfield development (i.e. Stebbings Valley and Lincolnshire Farm). These developments do not support the council's vision for a compact city. While we understand these developments have been consented, and that greenfield development is not desirable, a lesser evil would be to require these to be net-zero energy developments (including transport). Regardless the Architectural Centre believes that there is still capacity within the centres of the CBD/Adelaide Rd, Johnsonville and Kilbirnie to significantly increase population density, and we endorse the council adopting "incentives to stimulate development" (p. 37) to achieve higher densities in these three areas. We would also support greater density (via infill and new development) in the CBD extended out to encompass a commuter pedestrian's walking distance.
9. A comparison of the population densities of world cities makes it clear that there is huge capacity within Wellington to accommodate more people. Rather than opening up greenfield sites for development, the Architectural Centre considers that council energy needs to be directed to facilitating inner-city development, including establishing mechanisms to group land parcels large enough for

economic redevelopment. We also believe that the public promotion of high quality urban design, and apartment design are critical - through both exemplar and District Plan provisions. We do not support extending the growth spine out to Tawa. In a similar vein we wonder if the time has come when the single detached house is passed its use by date. We do not think the council should actively support the building of any more detached houses, and should only consent medium and high density developments, within the growth spine area. We strongly support council incentives for medium and high density housing in the CBD, Adelaide Road (north of Newtown), Johnsonville and Kilbirnie. Needless to say, we support the Adelaide Road Framework (p. 36).

10. An important part of our population growth will inevitable be older people. The council needs a proactive urban strategy for older people which includes inclusive urban design, improved public transport access, and better public transport infrastructure, especially bus stop design. Currently bus stops are primarily advertising props. We believe that the council has an ethical obligation to ensure that bus shelters provide protection for bus patrons from prevailing winds, and from rain. Very few bus shelters in Wellington achieve this very basic function, and you need to address this urgently.

city	population density (pop/sqkm) <sup>1</sup>
London	5,800 (2011)
Madrid	4,700 (2011)
Tokyo/Yokohama	4,400 (2010)
Barcelona	4,300 (2011)
Paris	3,900 (2008)
Stockholm	3,800 (2010)
Vienna	3,800 (2010)
Florence	3,700 (2010)
Rome	3,400 (2010)
Berlin	3,000 (2011)
Toronto	2,800 (2011)
Copenhagen	2,700 (2010)
Auckland	2,400 (2008)
San Francisco	2,100 (2010)
Sydney	2,000 (2011)
Vancouver	1,900 (2011)
Wellington	900 <sup>2</sup>

Table 1: Various population densities of world cities.

11. We also note that the diagram of defined growth areas (p. 54) would be more useful if it included current population densities. Does the growth spine currently have an even density along its length? What is the density along the growth spine that the council is aiming for? The answers to these questions appear to us to be more directly relevant to the council's strategy than the number of estimated dwelling potential. Comparative figures with the urban spaces and cities that we are aiming to emulate would also enlighten the discussion. We consider that Wellington's urban form has too low a population

<sup>1</sup> With the exception of Wellington, the population densities are taken from Demographia data - which does not include Wellington. We acknowledge different sources will often give different densities due to the urban area used, so see these figures as indicative. *Demographia World Urban Areas* (May 2014) <http://www.demographia.com/db-worldua.pdf>

<sup>2</sup> Wellington has a population estimated at 398,000, up slightly from the 397,000 estimated in 2013. The urban area has a fairly low population density of 2,300 people per square mile, or 900 per square kilometer. The larger metropolitan area has a population of about 403,000, with a density of 750 people per square mile (290/square kilometer). "Wellington Population 2014" *World Population Review* <http://worldpopulationreview.com/world-cities/wellington-population/>

density city and that more dense development is needed in conjunction with high quality urban design, and high quality living spaces.

#### Capital City

12. We are New Zealand's capital city. There was significant work done previously by the council regarding both initiatives around the Parliamentary precinct, and work to imbue the wider city with greater awareness of its capital city status. We support long term planning (including anticipation in the District Plan) to provide a harbour connection to Parliament grounds. We also consider that processional routes from Parliament to Government House (especially the route along Lambton Quay/Courtenay Place, down Kent/Cambridge Tce and around the Basin to Government House) are important to acknowledge as part of our city's identity as the capital city and our country's constitutional link to the English monarchy via the governor general. Acknowledgement of the National War Memorial precinct (from Taranaki Street through to the Basin Reserve/Government House) as a nationally significant heritage precinct would be appropriate to formalise during the centenary of WWI (1914-1918), and of the ANZACs at Gallipoli (1915).



Figure 2: Hiroshima Memorial Peace Park; Saiki Peace Memorial Park

13. We also consider recognition of New Zealand's anti-nuclear stance. Wellington's formal status as a nuclear-free city, and the strong ties Wellington has (through Te Ati Awa/Taranaki Whanui) to Taranaki and Parihaka, and the historic imprisonment of Parihaka Māori at Mt Cook gaol in the 1870s (prior to their removal to Dunedin), could be acknowledged through a National Peace Park, especially given the international, as well as the national significance of Parihaka and New Zealand's anti-nuclear stance. Any such proposal would require collaboration and co-partnership with Te Ati Awa/Taranaki Whanui and Parihaka. Establishing and acknowledging nationally-significant sites is an important way to cement and visualise Wellington's international status as the Capital City.

#### Green spaces and place-making

14. The town belt is our city's "Hyde Park." Dominating our skyline the townbelt is also an important aspect of our city's physical identity, which is easily taken for granted. The Architectural Centre considers that in addition to the protection of the town belt as perpetual green recreational space, the views to the town belt need to be identified and protected.
15. With respect to Central Area Viewshafts (<http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/district-plan/volume01/files/v1chap13app.pdf> Chapt 13 p. 31) we note that there has been significant levels of new development in Te Aro, especially new residential apartment blocks, which are collectively increasing the average building heights of many Te Aro city blocks. This suggests to us that it would be timely to review the Central Area Viewshafts prior to more development in Te Aro. We also note that most view

shafts in Te Aro are presently from the city toward the harbour. Existing W-E views across the city to the townbelt include those along Buckle St, Vivian St, Majoribanks St, which collectively provide W-E views at both ends of Te Aro, and through its centre. We recommend the views be formalised as view shafts in the District Plan.

16. As reflected in the current Central Area Viewshafts, views to the harbour have traditionally been protected. In addition to existing District Plan Viewshafts, we strongly recommend that the District Plan include future provision for a more direct connection from Parliament grounds to the harbour. We also urge the council to provide incentives for New World to re-organise its Chaffers/Waitangi Park site to re-establish the Kent/Cambridge Tce view shaft to the harbour, and that this intent is signaled in the District Plan.
17. We support the council's intention to "enhance and improve access to the city's natural "blue" environment" (p. 59) and see this as achieving both environmental aims as well as urban place-making objectives. We support the strategic daylighting of inner-city culverted streams (e.g. the Waitangi, Waimapihi, Kumutoto awa) as well as explicit (but not necessarily written) interpretive work to convey the cultural, historic and ecological significance of these waterways.
18. We also consider the provision of new non-green public spaces as important to our city's future development. We recommend that an inner city shared space network (p. 47) be established for pedestrians and cyclists. This network (Figure 3) would include: Courtenay Place,\* Dixon Street, Tory Street, Cuba St (though we note that Cuba Mall is too heavily pedestrianised to be useful for cyclists), Eva/Leeds St, Egmont St, Ghuznee St,\* Marion St, Swan Lane, Victoria St,\* and Wakefield St (between Taranaki and Victoria St)\* as an initial network. (\*= roads that could allow low speed, low volume traffic, but would need to be re-designed so pedestrians and cyclists are given priority). We consider that the Victoria Street/Cuba Street regeneration area (p. 34) would be supported by such an inner city shared space network. This shared space network would need to be documented in the District Plan's Hierarchy of Roads. (<http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/district-plan/volume03/files/v3map34.pdf>)



Figure 3: Key streets in inner city shared streets network

#### Housing

19. We consider that the council has an important role in ensuring and improving the poor quality and quantity of Wellington's housing stock. Areas which we

support council involvement (directly or through working with the GWRC and/or central government) include:

- a. eliminating homelessness in Wellington
- b. improvements to tenancy law
- c. a warrant of fitness regime for rental properties (p. 55)
- d. championing accessibility and universal design (p. 55)
- e. developing incentives for retro-fitted insulation (p. 55)
- f. encouraging rainwater collection at the household/workplace level for sustainability and disaster resilience reasons (p. 58)
- g. developing incentives to decentralise power supply. By this we mean encouraging ratepayers to invest in solar panels, and incentivising applications for wind and tidal power generation. This will add to our collective resilience as well as reduce carbon emission, and work towards our aim to be a carbon zero city.
- h. green rooves
- i. sustainable building practices (p. 59), including sustainable waste management and re-use (rather than recycling) strategies



Figure 4: The Barbican apartments and Arts Centre, London.

20. The document points to the CBD, Adelaide Road, Johnsonville and Kilbirnie as key locations for higher density residential development. There are of course many models to do this. One model which seems to us to be worth pursuing is that of the Barbican in London, which includes residential towers as part of its mixed use high density development. This late modernist precinct includes an Arts Centre (Gallery and Theatre) as well as cafes and public urban spaces. While being known as "council housing for the rich," the Barbican is an excellent example of how a highly desirable high density residential development might be implemented in the inner city. The Architectural Centre strongly advocates for such a single development to be constructed at the north end of Adelaide Road, and that the District Plan anticipate this. Similar developments could be appropriate anchor projects in Johnsonville and Kilbirnie. We also note (as the document identifies Karori as a key centre for growth (p. 40)), that the currently underutilised former Wellington Teachers Training College (now VUW) is a site and building whose interior could be remodelled as residential apartments resulting in a Barbican-like development. Its lecture theatres, gymnasium and performance spaces could provide community facilities which complement the residential function.



Figure x: Karon Teachers Training College

21. We realise that to achieve such developments, particularly in Johnsonville, Kilbirnie and Adelaide Rd, negotiations with numerous landowners etc. will be required. We strongly recommend that the WCC runs a series of speculative design competitions for large-scale high density residential and mixed use developments as core projects for each of these sites. We are more than happy to help with this.
22. We congratulate the council on its innovative and progressive work in relation to social housing. We consider that investment and commitment to social housing is an important aspect of a local council's contribution to its community. Despite all this excellent work, we understand that there is more need than the current housing provision. We suggest that to help assist this a council requirement for all new developments to provide (say 15-30%) social housing is needed. Affordable Housing Provisions are a requirement in many civilised places in the world. We could do this too. Examples of related housing strategies include Vancouver (which requires 20% of units in new developments to be affordable housing), Amsterdam (30%), and London (30-50%).<sup>3</sup>
23. We note that the consultation document makes no mention of homelessness. We see this as a significant omission. We strongly encourage the council to include its homelessness strategy (Te Mahana: A Draft Strategy to End Homelessness in Wellington: A strategy for 2014-2020) in its list of related council policies. We encourage the council to elaborate on homelessness as part of the housing section of this Draft Urban Growth Plan. We also consider that more detailed discussion regarding social housing is required.

#### Urban Design and Heritage

24. In the last 6 years begging on Wellington's inner city streets has developed. This is both a social welfare issue and an urban design one. We do not condone the previous council's attempts to surreptitiously relocate homeless people through urban design (e.g. the redesign of Glover Park), because public space is for all of Wellington's citizens to occupy, but rather think the causes of poverty need addressing. Clearly there is more poverty etc. and central government's social welfare system is failing. How do we as a city support

<sup>3</sup>Historically London has specified 50%, a the "City of London Local Development Framework" tested rates of 30-50% ("City of London Local Development Framework" (May 2010) <http://www.cityoflondon.gov.uk/Services/Environment/Planning/Planning%20and%20Development/policies/policies%20index.html>).

New regulations mean that targets can be set by either % or absolute numbers (currently at least 13,200 more affordable homes per year), which makes comparisons with % less straightforward. (*The London Plan* (July 2011) p. 96. <http://www.london.gov.uk/assetstore/attachments/2011/07/2011plan%20101.pdf>).

these people who are not getting sufficient welfare assistance from central government? What is the council doing to help these people?

25. We only partially support the strategic land acquisition plan for the "development of the city's transport network" for public transport and cycling (p. 34), because successful cycle, bus and tram networks have been established in many cities with more restrictive space than Wellington (i.e. much of Europe). We would however point to the need to have a strategic land acquisition plan to meet existing and future needs for inner city parks and recreational spaces to support increased CBD density, the re-establishment of important but blocked view shafts (e.g. Kent/Cambridge Tce to the harbour), and to forge place-making. A smart land acquisition plan will build on the city's precinct characteristics ensuring variety and richness of city spaces, creating urban depth in our city fabric. The work of the Wellington Sculpture Trust has been heroic in beginning ways of uncovering new urban identities. We wonder though if a shift in scale is needed, and that rather than primarily focusing on the location of sculptural objects within existing places bolder work is needed to be done in order to create a greater variety of urban space and place. New and existing spatial networks (e.g. the historic borough centres) might provide the civic identity infrastructure which enables Wellington to be less two dimensional as a city. A more layered and dense urban fabric will create a more exciting and less exhaustible urban experience, one which citizens, visitors and tourists will want to explore and return to, rather than feeling that they "know" Wellington in less than an afternoon. Increased population density will also force the city to be more complex and more interesting.
26. We also support the continuation of the laneways programme, but caution that aesthetic diversity is important. We don't want all lanes becoming aspirationally middle-class and anemically gentrified (like Chews lane). Don't kill character, and remember that asphalt is a great and robust footpath material - especially in the rain whereas the council's peach-coloured paving is not, and can be quite slippery. The upgrading of Opera House Lane is a good example of improving the environment while not quashing idiosyncrasy.
27. In addition to the broader organising desires of urban design, we also encourage the council to look after its individual buildings and urban spaces. Council-owned buildings, such as those in the Basin Reserve (e.g. Vance Stand and Museum Stand), have not suffered from civic TLC. These buildings are an embarrassment. The council must be a leader in demonstrating care for the built environment as champions of the very behaviour they urge from ratepayers; not leading villains of deferred maintenance. In a similar vein, footpath and the general pedestrian area around the Basin needs basic maintenance as a minimum - though we don't encourage the sad and austere "plonked planter-look" that has replaced the street-sculpting shops, once at the corner of Kent Terrace and Ellice St.
28. The statutory requirement for listing heritage areas and places in the District Plan means that many heritage sites are formally recognised, but we are concerned that many sites with heritage value may not be acknowledged or protected because of the under-resourcing of heritage both at the WCC and Heritage NZ. We note that extreme difference, as an example, of the number of council officers charged with heritage roles at the WCC and the staff numbers at Auckland Council. In addition to more resourcing at a staffing level, we also consider that some kind of mechanism which acknowledges the systemic issues with respect to heritage recognition is implemented. We also strongly encourage the council to better support heritage through addressing its staffing levels.

29. While Wellington has a substantial urban grid inherited from the nineteenth-century, we also enjoy the distinctive Victorian boulevard of Cambridge and Kent Terraces and the Canal Reserve, with its (now conceptual) link to the harbour, the culverted Waitangi Stream beneath ground level, and the Basin Reserve, which - like the names of some of its neighbouring streets (e.g. Rugby St (east) was formerly Dock St) - refers to another body of water. We believe that the historic significance of this distinctive nineteenth-century town planning needs to be formally recognised in the District Plan. Its street structure is unique to Wellington and an important part of our urban fabric and city identity. The presiding Queen Victoria statue (originally in Post Office Square) seemingly reinforces the compelling form of this nearly 200 year street plan. We disagree with the document that improvements in this area are dependent on any development at the Basin Reserve. Instead we consider that some judicious tree trimming, and the relocation of the Greek memorial to a more organically-shaped part of the city, would better enable the severity of the canal geometry to be read. We also support greater building density along the street frontages of property would be advantageous, perhaps with the less formally structured aspects of the car yards fronting Hania Street.

30. The consultation document (under heritage) refers to the need to reflect the principles of Te Tiriti o Waitangi, and we are not really sure what "reflect" means in this context. We would encourage more assertive wording - perhaps the council's work need, to "enact" the principles of Te Tiriti o Waitangi?

31. We appreciate the council's acknowledgement of tangata whenua and mana whenua, but wonder if there are additional ways Wellington could demonstrate engagement with Māori heritage and culture. Perhaps a short-term aim might be that 80% of Wellingtonians know and can pronounce the names of local iwi? Perhaps the council should have a target regarding the % of fluent te reo Māori speakers in Wellington? We also wonder if there is some way of ascertaining the level of local knowledge about Wellington/Pōneke/Te Whanganui-a-Tara.

32. Our city streets reflect an imbalanced history, and possibly not an accurate heritage for our twenty-first city. The dubious directors of the New Zealand Company (e.g. Abel Smith, Boulcott, Buckle, Courtenay, Ingestre, Elice, Lambton, Majoribanks, Molesworth, Nairn, Pirie, Thompson, Vivian, Wakefield, Webb, and Willis) have comprehensively infiltrated our streetscape. We are not sure if a complete replacement of these names is the best plan (the New Zealand Company is after all part of our collective history - for good or bad). Perhaps the double-naming of Matiu/Somes Island (which Pākehā named after the New Zealand Company's Governor (Joseph Somes)) provides an example. Regardless we consider, almost 200 years on, that it is time to review our street names to better reflect the heritage of our city.

#### Transport

33. We are at a point where many productive things have been done in Wellington to support active sustainable transport and public transit, but we believe it is time that our city drew a line in the sand - so to speak - and committed fully to active and sustainable transport modes - in practice, rather than just in policy. It is time to:

- a. remove all car parking from arterial roads
- b. develop a cycle-pedestrian shared space network throughout the CBD
- c. implement public transport fare transfers - it is crazy we don't have this, especially now the Snapper enables the capacity to programme this.

- d. develop a system of route legibility; a design palette and conventions which clearly indicate which transport mode is prioritised in specific areas. Legibility is often best using more sophisticated design strategies than signage.
- e. build cycleways from the CBD out
- f. introduce dropped kerbs to maximise the potential of cyclists to best utilise available footpath and road space.
- g. use simple techniques such as painted roads to increase the awareness of, and explicitly allow space for, different transport modes (e.g. pedestrians and cyclists)
- h. traffic light timings (e.g. with the use of barn dance crossing) can prioritise pedestrian and cyclists. Similarly traffic light timings can penalise specific transport modes. We note that the current traffic light timings at the corner of Ghuznee and Victoria Streets sends a clear signal to pedestrians that they are at the bottom of the transport hierarchy.
- i. commit to providing light rail, initially from the railway to the Embassy Theatre/Basin, and in the long term along the full length of the growth spine. When Nice, for example, replaced 4 bus lines in 2007 with its single-line tramway, it had a population of 350,000 approx. The number of passengers has grown from 70,000 per day in 2008 to 90,000 in 2011. What we are suggesting as an initial step is significantly less ambitious than this.

We can achieve 80% of all of non-freight trips within Wellington city being taken by active and sustainable transport within 10 years - if there is political will, and only you, as our councillors, can achieve this for our city.

34. The focus of public transport is the existing PT spine, which has in part been shaped by the pinch points of our topography. The Architectural Centre considers that it is time that a secondary spine is developed (possibly along the south coast) which picks up suburban terminals (e.g. Island Bay, Houghton Bay, Breaker Bay/Moa Pt), and provides better connectivity. A route from Owhiro Bay through Island Bay, Lyall Bay, Breaker Bay, Seaton, Miramar and Kilbirnie might both support the growth of Kilbirnie as an employment/residential centre and provide better public transit connectivity between the whole of the south coast and the airport, and simplify west-east journeys from the south coast. An alternative strategy might be to advance fare transfers and align route timetables (e.g. no. 3, 4, 6, 30, 32 etc.) to enable seamless connections, and extend routes where needed to provide connection around the whole of the south coast.
35. The document acknowledges that "[p]ublic transport is a considerably more efficient mode for moving people than the private car" (p. 47), and public transit is acknowledged as an effective way to reduce congestion - if it is significantly more appealing than the private car. We continue to think that a light rail route from Wellington Railway Station to the airport is the best long term public transit solution, and strongly support "an extension of the rapid transit network spine to the airport" (p. 37). Until that time significant work will be required to achieve a mode shift to PT, and the gains will be minor. We suggest the following:
- a. free peak-time PT (to reduce the number of cars on the road) and attract people to PT
  - b. a requirement that city and regional councillors are provided with Snapper cards, and use public transport for council business. We believe this policy would be the best way to incentivise improvement to public transport.
36. We do not agree with replacing electric trolley buses with hybrid diesel buses, and we disagree with the comment regarding taxi parking: "it is not possible to

provide parking spaces for all taxis so our focus has long been to provide sufficient adequately located taxi ranks in high demand areas" (p. 47). We are perplexed as to why you would provide taxi ranks, when effort should instead be put into access to PT. Would it be possible to effectively restrict taxis to a park'n'ride form of transport - perhaps at either end of the Golden Mile?

37. We are encouraged by the council's stated commitment to cycling, though (as noted above) the significant advantage existing for the private car appears not to be fully understood. If the council is sincere about wanting mode shifts to occur toward pedestrian, cyclist and public transit, then significant thought and finances need to be directed to these transport modes, until the city transport infrastructure reflects the stated hierarchy of "Our transport strategy [that] recognises in priority order: pedestrians, cyclists, public transport, moving freight and private vehicles." (p. 50). What this order of priority promises is that when private vehicles truly have the lowest priority in our transport infrastructure, then new investment *might* be considered.
38. We also understand that "Cycling is ... the most efficient form of human-powered transport" (p. 43). We understand that cycling is 3 time more efficient than walking, 5 times more efficient than taking a train and 15-20 times more efficient than driving a car. Given this it makes sense for cycling to be given the highest priority as a transport mode. We suggest that:
  - a. that a cycling network is built from CBD out (using bus zones as a way to structure the progressive provision of cycling infrastructure), and that it is designed for cyclists rather than simply accommodated into existing roads.
  - b. cycle lanes and cycle parking is prioritised over car parking (p. 43).
  - c. all CBD intersections have bike boxes
  - d. there are improved cycling facilities at the airport (i.e. plausibility of long term parking)
39. We are not convinced that cycling improvements from the eastern suburbs to the central city will be delivered by the RoNS projects (p. 43), because we believe that the coastal route will be preferred until the difficulties of cycling through the CBD are fully resolved. We believe the issues with west-east and east-west cycling are related to the CBD impermeability, not the route to or through the Basin Reserve. We also do not concur that "[t]he most important issue is separation from faster moving vehicles" (p. 43) as we understand that traffic calming and reduced car speeds (even if faster than cycling speeds) can be more effective in providing an appropriate cycling environment than the separation of cyclists from motorists.
40. Currently the inner city has severe issues because of block impermeability. This has occurred in particular as a result of the reversing of Vivian St's one-way, which has meant that there is no roadway for cars or cyclists travelling westward from Cambridge Tce from the Basin, until Courtenay Place. We consider that addressing this is a high priority. This has contributed to the underutilisation of Cambridge Tce, and the forcing of cyclists to the waterfront, regardless of their (workplace) destination. Other urban impediments include the Karo Drive intersection with Willis Street which is particularly ungainly for cyclists and pedestrians. To begin to address this, the Architectural Centre proposes:
  - a. the reversing of Jessie St's one-way, and rethinking its intersection with Taranaki St to facilitate right turns. (We support the proposal to "Review the one-way system" (p. 50)).

- b. negotiations with the Taranaki Street Methodist Church to enable low volume (traffic-calmed) traffic through between Holland St and Taranaki Street
- c. the extension of Barker Street to Tory Street
- d. formalising existing pedestrian/cycle routes, which are used but often involve trespassing (e.g. routes from Jessie St through to Vivian St). We consider protection of these routes important prior to further residential development to prevent existing routes being built out.
- e. extend Garratt Street through to Victoria Street
- f. redesign the Karo Drive intersections to reduce pedestrian and cyclist travel times.
- g. narrow Wakefield St/Jervois Quay to reduce the barrier between our city and our harbour, and reroute commuter traffic from the waterfront to the inner-city bypass (ICB).
- h. remove car parks from all arterial roads (e.g. Willis Street, Taranaki Street)

In addition we believe that the city needs more infrastructure, such as bike parks and workplace showers, to encourage cycling. We note that free use of the bicycle repair tools and tyre pump outside the central library is a good start.

We also strongly encourage the council to ensure that its transport principles for the CBD are replicated in the Johnsonville and Kilbirnie Town Centres (e.g. discouraging commuter parking (p. 51), prioritising pedestrian, cyclist and public transit over the private car (p. 50)), as we believe this will increase the viability of these centres as liveable and vibrant places.

One remaining issue which we consider to be of critical importance is school traffic, and the need to significantly increase the percentage school students who walk, cycle or bus to school. Directly addressing this will reduce peak-hour traffic, and establish transport norms in our city's future.

#### Digital Strategy

We are surprised that the consultation document does not comment on digitally-related issues and the potential for new technology and new media to contribute to long-term civic form, identity and development. E-commerce, e-commuting, e-freight could have significantly different urban outcomes (especially in relation to resource use), than currently dominant ways of working, and commuting. Comprehensive free wifi across the city might broaden the commuter peak-time. E-freight (especially with the increasing viability of 3D-printing), might significantly reduce freight demand, in the way that e-mail has gutted the viability of mail as a business. The traditional pressures on road space might not be as time sensitive as currently is the case.

The use of smart phone apps to make car parking more efficient has been demonstrated (p. 51). Similar applications make renting (or sharing), rather than owning, a car viable (e.g. Melbourne's car share scheme: "goget" <https://www.goget.com.au/>), and can provide real-time traffic information to reduce congestion and make the best use of the whole of the roading network. The efficiencies possible with such technology suggest more sophisticated ways (via information sharing) to provide roading capacity for different modes than simply increasing physical space. They also suggest that if the uptake of these technologies coincides with physical reduction of allocated road space, a specific mode might not experience reduced levels of service.

We strongly support the council's intention to "[f]acilitate the provision of a car share scheme" (p. 50), and suggest that managing competing roading interests might be

in part ameliorated by a shift from privately owned to rented or shared vehicles, in addition to outright mode shifts.

**Conclusion:**

Thank you again for this opportunity to comment on this Draft Urban Growth Plan. If you have any questions please do not hesitate to contact me.

Yours faithfully,



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### Tawa Community Board Submission Wellington Urban Growth Plan 2014 - 2043

The Tawa Community Board (TCB) wishes to make the following submissions to the Wellington City Council's 'Wellington Urban Growth Plan 2014 – 2043'.

#### *Transport choices*

Real transport choices are being promoted along the 'growth spine', but if Tawa is to become a 'suburban centre', it needs to share in this growth of transport as well.

Part of this includes park and ride facilities in Tawa keeping up with demand. Park and ride is already reaching its capacity during the business week. And while some progress in the expansion of available park 'n' ride spaces has recently been made by GWRC for Tawa and Takapu Road rail stations, there needs to be further investment in park 'n' ride in the Tawa area stations for Tawa to continue offering the same standard in liveability and access to public transport infrastructure for the forecast new dwellings.

Additionally, Wellington city council should work with GWRC to increase the capacity of transport to the central city over the lifetime of this plan.

#### *Stebbings Valley*

Stebbings valley area looks to be a good area for future urban growth, and should contain many new dwellings. However, the interaction with Tawa has not yet been formally planned but could include a link road to Tawa. This road could have major effects on Tawa residents, should it proceed down a suburban back street in order to reach Central Tawa. This is inappropriate for the local roading network, as these streets were never intended to contain inter-suburban roads. The Urban Growth implementation plan ought to provide some clarity to this issue in order to provide some certainty for Tawa residents.

#### *Suburban centre*

Whilst the designation of a suburban centre appears to be a good plan for growth in Tawa, there are concerns around the size of the area proposed, which appears to cover the bulk of central Tawa, as well as the size and quality of dwellings that are supported by the plan. We recommend that the area of the proposed Tawa 'suburban centre' be more clearly delineated in any future consultation to avoid ongoing confusion by existing residents and unnecessary concern.

If medium density housing is taken to mean dwellings that may be up to three storeys high, as well as terraced housing, we do not believe that Tawa has the social infrastructure as well as the traditional infrastructure to support this growth.

The quality of dwellings intended to occupy central Tawa under this plan is also of concern. Recent developments of other 'high quality' housing in Johnsonville has shown us that if this was to take place in Tawa, the quality will need to be greatly improved for it to be acceptable in Tawa.

As highlighted in this plan, the suburban areas will continue to be attractive areas for families. We do not believe that young families would desire to live in an apartment style housing unit in Tawa, when they could choose to live in the same style of housing in the central city, and be far closer to the amenities that the central city offers.

We request that Officers refer to the submissions of the Board from 2008 on this topic.

### *NZTA roading developments*

The two projects: Petone to Grenada Link Road and Transmission Gully, both have major impacts on Tawa residents. These impacts need to be mitigated to ensure a positive outcome and therefore confidence in the continued success of urban growth for Tawa.

This includes impacts on green spaces areas, such as Grenada North Park.

### *Environmental growth*

It is good to see the planned improvements to Grenada North park, following on from the planned development in the 'Our Capital Spaces' plan last year.

It is good to see that the skyline walkway development has been included in this plan. This is a long awaited and attractive link from the reserves and natural spaces in the north of Wellington, to the rest of the town belt and skyline walkway. This walkway will also allow a better integration of Wellington northern suburbs with the recreation opportunities proposed for the wider Spicer Forest / Colonial Knob Recreation area.

### *City resilience*

The resilience of Tawa would be greatly improved if an additional water reservoir was built near Tawa as planned to further buffer the impact of any seismic interruptions to the Hutt Water Main supply.

Tawa is otherwise an ideal central and low risk location for business to locate their backup systems and data, as shown by the Plan B building development in central Tawa and we submit that this aspect should be promoted in the Urban Growth Plan.

### *Central city development*

The planned development of several additional event and sporting venues and facilities is a good idea to promote growth in the ratepayer base of Wellington city.

However, each project should have its costs and benefits weighed before it is developed. The prime example is that the convention centre may appear to be a good venue for development, but if every other main centre in New Zealand also intends to build a convention centre, will Wellington's still be utilised as forecast?

### *Engagement*

The Tawa Community has shown that they are passionate about this topic, with many submitting to Council when they have previously been consulted.

We feel that the Council should conduct meaningful engagement with the Tawa Community when proposals regarding Tawa are drafted early in 2015.

### **Tawa Community Board**

Robert Tredger (Chair)  
Graeme Hansen  
Richard Herbert  
Margaret Lucas  
Jack Marshall  
Alistair Sutton

## Wellington Urban Growth Plan

1.

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**I am giving this submission:**

on behalf of an organisation

**Organisation name:**

Friends of the Tawa Bush Reserves

**Your comments on the draft plan:**

1. We oppose any road connections from Stebbings Valley to Tawa where it intrudes into the established regenerated bush area adjacent to Redwood Bush. Such a road could not be achieved without considerable cut and fill.
2. We would encourage the protection of the Marshall Ridge and pedestrian connection to Te Araroa Walkway.

**Submission on WCC Draft Urban Plan Oct 2014  
from Churton Park Community Assn Inc**

The Draft Plan has been studied by the Committee of the Association. Our comments below are in two parts. The first part details three projects that we feel should have been included in the plan.

In the second part we make comments on the information contained in the Draft Plan.

Our interest and therefore our comments are focussed on the Northern suburbs, and how they will grow as we move towards the year 2043.

**Proposed projects that should be included in the Draft Plan**

**1 Extension of Melksham Drive, Stebbings Valley, to connect with Tawa**

This potential road connection is mentioned on page 36 of the Draft Plan.

The actual connection point could be with Greyfriars Crescent or through the land adjacent to Arohata Prison.

The reasons for promoting this link are as follows:

**a Vulnerability of existing route through Middleton Road.**

Middleton Road between Westchester Drive and Willowbank is a vital link in the local roading layout. It is the only Wellington City controlled road connection from the CBD to the northern suburbs and beyond. It often used by large numbers of vehicles on the occasions when the motorway is blocked either by accident or other event. The road is narrow, and with a poor alignment. The route is vulnerable from the over steep high cut batters in unstable shattered rock, with the batters topped by a very large number of unstable pine and macrocarpa trees. During and after storms locals are very aware to watch out for obstructions.

In addition it should be noted that there is a vulnerable point on the section of motorway between Churton Park and Tawa, being the retaining wall immediately before the northbound off ramp to Tawa.

An alternative route from Tawa to Churton Park through Stebbings Valley would mean that WCC would have a secure route available to the north. This would enhance the resilience of the internal WCC roading network in accordance with the objective detailed on Page 22, as well as the resilience of the main connection north from Wellington.

**b Transport and Movement.**

The completion of a link between Tawa and Churton Park through Stebbings Valley would open up additional possibilities for public transport options. At present the Redwood area of Tawa is very poorly served by public transport. A link to Stebbings Valley would enable a service to be provided say from Porirua through Tawa, over into Stebbings Valley, Churton Park and on to Johnsonville.

**c Better utilisation of civic amenities.**

Stebbing Valley is a long way from the town centre at Johnsonville, for residents wanting to

use the library, swimming pool and major sports grounds. A road connection to Tawa would mean that the Tawa facilities would be far closer than the equivalent facilities in Johnsonville. This connection will allow the growth in demand for civic facilities, which will follow the increased population in Johnsonville to be shared between Johnsonville and Tawa.

**d Community Connectedness.**

From a planning point of view, cul-de-sac subdivisions are not good. Connections need to be available to other adjacent areas of the city to remove the perception of exclusivity. In addition, alternative access and egress provides resilience in event of an unforeseen event.

**e Implementation.**

This connection must be detailed in the WCC District Plan

The construction of Melksham Drive in Stebbings valley is being undertaken by the developer at a rate to suit the release of building sections.

We recommend that WCC work with the developer so that the road link can be constructed in advance of subdivisional activities. If agreement to construction cannot be achieved, WCC should at least require the subdivisional roading layout to be in conformity with the eventual linking up of Churton Park and Tawa.

## **2 Extension of Westchester Drive at south end**

In the 1970's a proposal was developed to construct the "Northwest Connector" road. This road was planned to give a bypass route from Burma Road, via John Sims Drive, McLintock St and Westchester Drive to Middleton Road and the motorway at Glenside. This gives an alternative route north to bypass Johnsonville town centre and Churton Park. The recent completion of the northern section from Lakewood Avenue to Middleton Road has been an important step. Action needs to be taken to close the other gaps between Westchester Drive south and McLintock St North, and also in McLintock St and John Sims Drive.

The reasons for promoting the completion of this bypass route are as follows:

**a Johnsonville bypass**

Traffic around the "triangle" in Johnsonville is a significant problem. Some steps are being implemented at present which are planned to help alleviate the situation. However this route will enable traffic from Churton Park (and potentially Tawa) heading towards Khandallah to bypass the Johnsonville congestion entirely.

**b Community Connectedness**

The housing areas at the top of Cortina Ave are very close in a direct line to those at the south west corner of Churton Park, but a very long way away by road. The completion of this connection will allow these communities to become more closely connected.

The completion of the northern end from Westchester Drive to McLintock St North at Ohariu Road will enable the south west corner of Churton Park to have a far better connection to the town centre at Johnsonville. In addition it would provide an option for an additional bus route from Westchester Drive to Cortina Ave, including a western route from Tawa.

### **c Implementation**

The timing of the implementation of this project appears to be under the control of WCC. We recommend that WCC take all available steps to move towards the completion of the various stages of the "Northwest Connector"

### **3 Main cycling route to Wellington**

The Draft Plan devotes considerable attention to the needs of cyclists and the desirability of making cycling an attractive option for commuting. However despite this emphasis on cycling we could not locate in the Plan any reference to the need to provide a safe means for cyclists to travel between Willowbank and Middleton Road at Westchester Drive. The section of Middleton Road through the Gorge is not very safe for either pedestrians or cyclists, having a substandard width and alignment, often with the carriageway covered with debris which has frattered off the steep batter slopes. In addition the road has a 70km/hour speed limit.

Middleton Road is the only route for cyclists coming from the north to Wellington, and as noted above Middleton Road has a low level of security as a roading link.

The adjacent motorway has been designated as a Road of National Significance, because of its importance in the national roading network. With similar reasoning this cycle route is also of National Significance, serving cyclists travelling the length of NZ, as well as local cyclists.

#### **Implementation**

We feel that the project to provide a safe cycle route from Willowbank to Glenside through the Gorge should be a part of the Plan, and be implemented as soon as soon as possible.

### **Comments on the Draft Plan.**

These comments are indexed by reference to the page number, in the absence of paragraph and clause numbers.

#### **Overall Impressions.**

As this is a document that sets out the development of Wellington to 2043 we are surprised that it contains so many glossy full size pictures rather than detailed information. It appears to be more of a sales document rather than a blueprint for the future.

We are also surprised by the lack of specific proposals, and the appearance that it is full of "aspirational statements" of a very general nature.

We are not convinced that this document will (page 14) "*....ensure the city will continue to provide a high quality urban environment...*"

The Draft Plan takes a very parochial approach and makes no mention at all of the other adjacent Local Authorities.

We feel that this is a major omission in the Draft Plan, because Wellington City is supported by the commuters coming to work in the city from other areas.

In return Wellington provides a centre for activities and facilities for the whole region, which would not be viable if Wellington was just a stand-alone city of 200,000 people.

Preparing an Urban Development Plan to the year 2043 must take into account what is planned in the adjacent cities in the Wellington Region.

**Page 15**

The details of population density and forecasts are meaningless. Although a fixed area has been used in the comparisons, the settled areas of the city have changed on many occasions since 1916. It implies that in 1916 people were very well spread out, and that in 2043 we will all be jammed together. In actual fact, the residents of 1916 may well have been very closely jammed together. A better measure would have been to show the population density changes in the settled areas, rather than confusing the data by including the areas not used for settlement.

**Page 18**

Map showing change in numbers of dwellings.

This section describes the housing by 2043, but the map refers to change in number of dwellings between 2001 and 2013. The projected increases in dwelling numbers are given for the central area. It would help if this information was provided for all suburbs.

It is very difficult to identify the actual suburbs on the map, and names should be included.

What is included in the very large western suburb?

It is also not at all clear if the projected increase includes Upper Stebbings Valley.

**Page 19 Natural Environment.**

There appear to be only three measurable targets given, being the Outer Green Belt, Harbour escarpment and Watts Peninsula. All the other targets are aspirational and unable to be measured.

**Page 24**

We note that the target is that the city public transport system is fully electrified by 2043.

We feel that the implementation of this target is under the control of GWRC.

Land Development.

More information on the proposed development of upper Stebbings valley is wanted.

**Page 25**

This refers to commuters. Are these commuters residents of Wellington City or of the Region? Are the 3% of commuters who travel by train the Wellington commuters (Johnsonville and out to Tawa) or total commuters. The answer has a big impact on the importance of the rail links.

**Page 29**

The detail on these maps is so small that no useful information is conveyed by them.

**Page 31**

No key given for the different colours shown.

**Page 33 Transformational Growth Areas map**

It is not clear why Upper Stebbings Valley had not been included as a green-fields growth area.

The yellow line titled "Cycle Network" appears to follow the motorway from Churton Park to Tawa.

What are the white areas?

The public transport spine does not appear to be the same as the GW Public Transport Spine.

**Page 36**

Plan for the development of lower and upper Stebbings Valley.

This section needs to be considerably strengthened

The structure plan referred to in this section must include the Tawa road connection, ( see Project 1 above where the justification for this road connection is detailed) Inclusion of the road link in the District Plan is a first step in the implementation of this project but must be followed up by concrete actions.

The route of the connection to the Te Araroa walkway should be fixed, and more details given on the steps that will be taken to *"complete the Outer Green Belt, and protect waterways, significant indigenous vegetation and Marshall Ridge"*

**Page 40 Key centres for growth Map**

This appears to be the same map as Page 22, so the same comments apply.

The difference between a Transformational Growth Area and a Key Centre for Growth is not defined.

**Page 42 Transport**

This section emphasises the importance of cycling, and to be effective the main cycling route into Wellington needs to be secure.

**Page 43 Transport in Wellington map**

This map is of no value and is very confusing as it shows (among other things) the cycle network being along the motorway!

**Page 44 Cycling.**

The priority improvements should include the connection from Tawa to Johnsonville as detailed above.

**Page 48 Public Transport.**

The spine is correctly referred to as Johnsonville to Island Bay, which is not as shown on the maps.

**Page 50 Road Network Improvements**

This is the section where the connection from Churton Park to Tawa, and the completion of the Northwest Connector should be detailed.

**Page 51 Park and Ride.**

The importance of providing additional "Park and Ride" at Johnsonville Station should be emphasised.

**Page 56 Housing types**

It is not clear what is being proposed for Stebbings Valley (Lower and Upper).

Is it to be low density (stand alone) or "denser development and subdivision in identified green-fields areas?"

Submission prepared by John Morrison Churton Park Community Assn Inc 13 October 2014

### Submission to the WCC on the proposed Urban Growth Plan (UGP)

#### Your name and contact details:

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Date: 14 October 2014

I am making a submission on behalf of and organisation - the Johnsonville Community Association (Inc.), or JCA.

#### I wish to speak to my submission

#### Introduction:

This submission broadly follows the headings of the draft UGP. However, elements of the "general" section include a comprehensive challenge to the fundamental assumptions and growth projections that underpin the UGP, and this section is written in such a way that fully explains the basis and consequences of basing the UGP on bad population forecasting. As a result of that fulsome detailing of the problems with population forecasting, there is some repetition of material within the rest of our submission.

#### A: Transformational Growth Areas

##### TARGETED INTENSIFICATION IS NOT "WORKABLE" IN OUTER RESIDENTIAL SUBURBS

We encourage WCC to consider and incorporate into their plan the learnings from the first 4 years of MDRA, namely that targeted intensification areas well beyond the central city (and its associated attractions & amenities), where the cost of housing units will be not significantly less than in the CBD, are financially uneconomic, and therefore bound to fail.

The end result of MDRA in areas without either a significant cost advantage, or the inherent benefits of inner city living, are simply not there: there is no incentive for people to live in "remote" MDRA areas (such as Tawa, Newlands, Johnsonville or even Crofton Downes) – and so these dwellings will not be in demand, and so will not be built in numbers that will make MDRA zoning successful. This is not speculation, it is fact, based on four years of MDRA in Kilburnie and Johnsonville.

The only way WCC can make outer suburbs MDRA attractive (and therefore successful) is to pay much greater attention to (and place much higher investment in) the relative attractions that these "Outer Medium Density" areas offer. These attractions must be ones that real people can and do value enough to live there, and we are extremely concerned that WCC has never actually asked potential homeowners or renters what would make them want to live in a MD development in (say) Johnsonville. Without determining those drivers, MDRA in outer suburbs is a colossal guess on behalf

of WCC planners, the success of which leaves whole communities and billions of dollars' worth of existing housing stock at risk (Just because the cost of MDRA falling will be borne by private homeowners, and not WCC, does not mean that WCC is not responsible for that cost...)

It is our very well considered view that targeted intensification (MDRA zoning) of areas beyond a moderate walk to the CBD (20-25 min walk) are left extremely susceptible to "planning blight", whereby the planning rules conflict with individual developers intentions, and this result in a stagnating redevelopment market.

In all likelihood, lower rent seekers (or home buyers seeking affordable dwellings) are more likely to choose lower density dwellings in cities north of Wellington city limits rather than what they see as overpriced and "cramped" higher density dwelling options within an "outer suburbs" MDRA type area that has none of the appeal of inner city higher density living.

That is to say, MDRA in "outer suburbs" will have the effect of driving residents - and developments - to migrate out of Wellington city altogether and commute from there (or ultimately telecommute, or create businesses from their new home north of Wellington). This risk is very real, and has significant consequences for WCC - it should not be ignored or dismissed lightly, as has been done in recent years (to the detriment of Kilburnie and Johnsonville).

We support such "targeted intensification" only for areas within walking distance of the CBD (ie Central City, Adelaide Rd, and perhaps Kilburnie, Newtown and Wadestown). Beyond that, we view MDRA as quite inappropriate, and more likely to create an unintended (and highly undesirable) planning blight.

Rather than attempting to "pick winners" by "targeted intensification", WCC would achieve far better success in encouraging more MD dwellings by modifying the entire "outer residential" zone to encourage "MD" redevelopment equally across them all....

WITHDRAW RESTRICTIONS THAT EXCLUDE MDRA FROM AREAS OF "CHARACTER VALUE"

If MDRA is to be retained and expanded, we encourage WCC to remove the "consider heritage values and existing neighbourhood character" clause, which has the effect of excluding "wealthy" areas from MDRA zoning and instead confining MDRA (including the associated stigma and blight) to relatively poorer areas - a result which is Undesirable in many ways.

The only way to make MDRA "fair" across the socio-economic spectrum is to exclude such restrictions, which effectively act as a "wealth filter", to protect "better off" suburbs from intensification.

For example, Khandallahs amenities are very significantly greater than Crofton Downs', yet the latter is being lined up for MDRA and the former is not. And yet there are some "MD" developments in Khandallah which look great, and for which there is clearly a very real demand....

The intelligent use of suburb specific residential design guides is an excellent and perfectly appropriate tool to protect the character of any suburb. A suburb specific residential design guide should be a perfectly adequate means of ensuring that MDRA can proceed successfully and appropriately even in areas deemed to have high "Character value"; Wellington Suburbs are dynamic, functional communities, and should not be treated as "museums" of colonial architecture, even pretty old houses have a finite lifespan, and urban renewal is necessary in all parts of the city, especially older and less "space efficient" ones....

#### WIDEN THE "TARGET" FOR MEDIUM DENSITY REDEVELOPMENT

In the "real world", the biggest factor to improving the economics of a "MD" redevelopment, is a low opportunity cost development site - i.e., a near derelict old building (where the real value of the existing building is minimal), or a Greenfields or sub-divided site. Such sites are not clustered in whole neighbourhoods! They are usually well spread out, and interspersed with newer dwellings, with much better longevity.

Selecting a street full of entirely brand new, low density homes for MDRA zoning (as WCC proposed for Sheridan Terrace and Cresswell Place in passing DPC-72 in 2010, although this area was later removed from MDRA by the environment court) is illogical in the extreme.

Instead, we propose that developers anywhere should be given the same opportunities and encouragement to redevelop & build "MD" housing on any site they deem appropriate, throughout the outer residential zone without consigning large swathes of whole suburbs to the stigma, devaluation and potential planning blight that MDRA zoning (as it stands at present) will confer on them.

As the conspicuous lack of success of MDRA in encouraging "MD" redevelopment in both Kilburnie and Johnsonville has thus far shown, allowing the market (not WCC planning restrictions) to determine where MD housing may be built IS the best way to ensure provision of "different housing types" (including MD) increases.

Imposing MDRA in "select" areas that WCC wants "MD" to be located in - but developers don't want to take a chance on, and tenants don't want to live in - is like "fighting for peace" - counter-intuitive, and doomed to failure.

#### B: Liveable and vibrant centres

This section is too high level, and contains no guidance for some of Wellington's largest and most important areas.

Johnsonville's Town Centre Plan (circa 2008) needs to be re-written as a priority, and this need should be included in the plan.

The Johnsonville Town Centre Plan (accepted by WCC in 2008) was rife with forecasting errors, and many of its key goals have been ignored by WCC (ie, facilitating the creation of a new public space in the town centre). Commercial redevelopment objectives in Johnsonville have been actively stymied by WCC district plan changes aimed directly at stifling commercial redevelopment - without any research being done to establish any factual basis for that. This was done in direct contradiction to the intent of the 2008 Town Centre Plan, and the ongoing effect (in terms of inhibiting MD Redevelopment of central Johnsonville) has been immense.

The plan has major deficiencies: there is no requirement for new commercial developments to provide any carparking, in an area where car use is particularly high.

As a result, the Johnsonville Town Centre Plan needs to be re-written with closer consultation with residents, businesses and landowners.

#### [Real transport choices](#)

#### JCA SUPPORTS MOVES TOWARDS MORE PUBLIC (RATES FUNDED) SUBSIDIES OF PUBLIC TRANSPORT AS AN AID TO URBAN GROWTH CHALLENGES

Wellington's population and geography do not encourage private vehicular transport. In the interests of a more liveable city and reducing carbon emissions, JCA supports moves towards much higher PT costs subsidies being met by rates.

The high usage of Private Motor vehicles underscores that fact that many Wellingtonians find their PT options inadequate.

#### CYCLEWAYS

We do not support the current policy of merely trying to "shoehorn" dedicated cycle ways into roads that are already "fully committed" to other modes, parking or access uses, and are not attractive to cyclists regardless of this facility. This approach can end up compromising safety and utility to an unacceptable level for all other users.

Instead, we encourage more "ground up" planning and construction of cycleways, that seek to create new and better facilities, designed from first principals for Cyclists.

#### PARKING

Parking in suburban Johnsonville has been a major issue for decades, and the community is aggrieved that WCC has not reviewed of the supply and demand for parking here and acted on the outcomes.

Regular reviews of parking supply & demand are very necessary, and well overdue. We welcome that initiative. However, it needs to be done, AND acted on.

Such a review would reveal that huge numbers of "unofficial" park-n-ride vehicles clog Johnsonville streets for many blocks beyond the town centre every day, depriving residents of "normal" on street parking opportunities, and congesting narrow streets. Such parking will become impossible once these streets are "intensified" under MDRA, and become increasingly "Residents only" parking zones. This situation is important for the congestion of the Central City, because it is the absence of suitable commuter parking near transport hubs like Johnsonville that have a significant impact on whether commuters choose to "park-n-ride" or drive into the CBD.

As we speak, WCC roading changes to the Johnsonville triangle are severely eroding the "official" park-n-ride supply, as well as reducing other on-street parking, yet none of this has benefitted from the (necessary, we think) evaluation of parking supply and demand.

While park-n-ride facilities are expensive, we feel strongly that their removal (without replacement) as is occurring in Johnsonville, has the perverse effect of reducing usage of Public Transport

#### D: Housing choice and supply

##### HOUSING AFFORDABILITY

We are disappointed that the UDP appears to ignore the question of housing affordability entirely, because it is the relatively high cost of Wellington housing that drives a huge amount of the net migration out of Wellington City that occurs after about age 23 (much of it by people re-locating to cheaper housing areas where they can afford to repay a mortgage, and still commute to Wellington City).

We believe that by ignoring the key factor of housing affordability, WCC is ignoring "the elephant in the room", and so much of the UDP is therefore based upon assumptions that are highly questionable or clearly wrong. Most importantly, the assumption that population will rise by such a massive amount over the term of the plan when it seems clear that that quantum of people will not be able to afford to live within Wellington City at all.

The Plan implies that intensification of suburban Wellington will just "magically happen" once WCC re-zoning occurs: yet, the converse is actually more likely. In most cases, at least two perfectly functional low-density dwellings (typically with a value of \$400,000 each) must be destroyed to clear land for that new MD Development. At MDRA environment court hearings in 2013, WCC's expert valuation witness agreed with his "opposite number" that this cost made MDRA redevelopment of Johnsonville evocatively uneconomic. Since then, those economic facts have been reinforced by there being NO "MD" redevelopments in either Johnsonville or Kilburnie, yet WCC have made no effort to address the fact that the policy is misaligned with reality.

So, why have those lessons of how affordability drives redevelopment not been included in the UGP? We would like to see the UGP re-worked, so that then policy logic includes affordability as a fundamental driver of Wellington population that it surely is.

##### HOUSING SUPPLY – GREENFIELDS DEVELOPMENTS

We are very concerned that the rate limiting step for Greenfields developments appears to be not only the restricted supply of land by WCC zoning (restricted largely to the northern suburbs), but that this policy effectively gives control of new housing supply to a very small number of speculative developers who are able to manipulate the supply of housing to pressure government to evade development contributions (and other "reasonable" development charges such as consenting fees), in order to maximise their own profit margins.

This results in a slow drip feed of new dwellings according to the developer's ability to maximise their profits, rather than serving the public interest by increasing supply significantly (and thereby helping increase affordability by reducing the undersupply of dwellings).

We suggest that WCC prioritise increasing competition for achieving real competition among developers, and disincentivise speculative "land banking". WCC should look at increasing supply of greenfields land (sale of public land and/or re-zoning, perhaps even in non-growth spine areas) in such a way that allows more true competition in the new greenfields housing market, for the ultimate benefit of all home buyers in Wellington City.

#### E. Natural environment

JCA strongly supports a significant change in rules around the improvement of the natural environment to foster more and better greenspace in higher density (MDRA) areas. The introduction of MDRA to Johnsonville has taught us many lessons, and this UGP is the ideal place for those learnings to be put to good effect.

**For Example:** A case in point is Johnsonville, where in a significant part of the MDRA zone there is no requirement for any private outdoor ground-level space with any new development.

Not only did MDRA as proposed to WCC fail to require the creation of new pocket parks (greenspace deficiency was highlighted by S32 reports, and creating pocket parks were recommended under S32 analysis as mitigation, but discarded by planners as too costly). Since MDRA was introduced, meagre existing green spaces within and adjacent to the MDRA zone in under a year, as follows:

a) Expansion of Keith Spry pool onto Johnsonville Memorial Park, reducing its area

b) the usable green playing field space on Alex Moore Park has been very substantially reduced by its conversion to asphalted car parks - one completed, a second consented but as yet unbuilt (which sit empty most of the week, and provide 'convenient access' for car owners from other suburbs to use, despite the park being across the road from Wellingtons biggest suburban public transport hub).

Alex Moore park is a jewel, a bastion of green in the densest suburb north of Wellington Central, which is about to become much more densely populated under MDRA. To allow such a large portion of greenspace to be converted to car parks at the very time that the green light has been given to MDRA intensification in the surrounding neighbourhood was against the wishes of most residents, is seen as a very negative step for the suburb.

c) The only "Youth facility" (a basketball half court) has been eliminated by a new WCC building, with no plans for its replacement.

Further, Johnsonville is demonstrably below WCCs "target service levels" for children's playgrounds, and this deficiency could be rectified by the creation of a 'community playground' and / or a youth facility on the upper level of Alex Moore Park.... however, there is insufficient space to accommodate such play facilities, because MDRA re-zoning has not planned for that, and (as above) the "spare" area of Alex Moore park has been targeted for carparking....

This example contrasts starkly with the "greenspace" requirements that would apply to a hypothetical new outer residential "greenfields" subdivision of 3000 people (the same number of additional residents that MDRA is expected to accommodate in Johnsonville). Such a new subdivision would not only give residents up to 50 square metres or more "private" greenspace" (as per "outer residential" rules), but also require a very significant amount of new, additional greenspace / playground & amenities to be created as part of that subdivision.....

Under current WCC guidelines, Playgrounds are provided based on walking distance to playground facilities of different levels. Only the "lowest" levels of playground exist in Johnsonville, for example,

and all are (in locals view) inadequate in one way or another (too small, insufficient play equipment, equipment unsuitable for ages of kids using them or badly in need of replacement), and none are well landscaped.

**PEOPLE NEED GREEN SPACES AND ADEQUATE PLAY AREAS TO STAY HEALTHY AND LIVE HAPPY LIVES. WITHOUT SUPERIOR GREENSPACE, MDRA CONFERS NO "COMPETITIVE ADVANTAGE" AND SO WILL BE SHUNNED BY WOULD-BE RESIDENTS, AND THEREFORE FAIL.**

The effect of poor access to greenspace is to severely compromise resident's health and happiness (We contend this will be the case in Johnsonville unless greenspaces are increased in number, size and quality within MDRA zone). We therefore submit that if the cost of imposing MDRA on its inhabitants is unacceptably high, and it should not proceed. If MDRA's are to be retained and extended through other Wellington Suburbs.

**JCA submits that the effect of loss of greenspace must be mitigated to a very substantial degree if ANY MDRA zone is to succeed in creating MD redevelopment.**

**WE PROPOSE THE FOLLOWING MEASURES ARE ADOPTED TO ENSURE THAT "OUTER" RESIDENTIAL MDRA ZONES DO NOT RESULT IN THE REDUCTION OR DILUTION OF EITHER GREENSPACE AMENITY OR RECREATIONAL AMENITY:**

- a) **MDRA status conforms an automatic moratorium on the existing greenspace of the area affected and 800m beyond.** Within that zone, no public space of any sort (park, recreation reserve, road reserve or suchlike) may be sold, divested or converted from use as a greenspace or park to any other use (including indoor or built amenities). In particular, Sports clubs which use public sports fields should not be given undue preference to use of playing fields over other residents. The value of sports fields as "green sanctuaries" for all residents (not just sportspeople) should be preserved and enhanced.
- b) **A special playground quality and quantity formula be introduced to ensure that playgrounds within and adjacent to MDRA zones are of a higher number and superior "play value" than other "outer" suburbs.** This is in recognition of the fact that
  - a. all children within MDRA dwellings will effectively be denied any significant private outside space (other than on driveways), and
  - b. that the higher density of children the zone will attract justify the extra expense, and
  - c. that if the MDRA is to actually be redeveloped as intended, it needs "extra" amenities to make it desirable for residents.
- c) **Significant tree planting / landscaping improvement**
  - a. of Any and All public land (including road reserves) within 400m of the MDRA zone should be landscaped and planted to a maximum extent possible
  - b. free native trees and planting services be made available by WCC (ideally through community volunteer groups or residents associations) to all private home-owners within 400m of a MDRA boundary be undertaken within three years of any change to MDRA zoning.
- d) **Creation of Pocket parks.** It should be accepted by all that the creation of private dwellings lacking the "traditional" private garden space should be accompanied by a modest distribution of small pocket parks. The cost of purchasing private land in order to create these small parks must be accepted by all as an integral cost of creating a MDRA area, (although that cost will be offset by an increase in property values for neighbouring dwellings).
  - a. **Buffer Zones:** Private dwellings adjoining pocket parks adjoining pocket parks could be required to plant trees along the 1m adjoining the boundary to a pocket park to

- b. Location and size: Corner pocket parks are best. Aspect should maximise sunlight to the park, and advise. Size of 250 – 400 square metres approx. is recommended.
- c. Use: Parks should be provided primarily for sitting amidst a small green 'oasis' – perhaps picnic table. Play equipment only allowable if a public play ground is more than 400m distant.
- d. Planning for the acquisition of private land for pocket parks may need to be enshrined in legislation. All owners of 'suitable' corner sections in MDRA zones could be advised that, if redeveloped, a portion of their section may be subject to compulsory acquisition for a pocket park, and the cost either met by WCC, or recovered from all new developments within the zone.

#### BIODIVERSITY

Despite the undeniably significant investment it makes in some areas, we feel strongly that WCC plays lip service to its commitment to Biodiversity, in our suburb at least.

It is not acceptable that a 2013 resource consent requiring 'LOCALLY SOURCED NATIVE SPECIES' to be planted on Alex Moore Park could be effected by WCC planting scores of non-endemic species, and defending that action by claiming that those endemic species cannot be encouraged to grow there (despite them having evolved specifically to like there over millennia. Even the very hardy local lancewoods that "should" have been planted were replaced with "ferox" species from Marlborough!

WCC is said to plant 5000 podocarps or canopy natives annually – yet almost all of our (many) Johnsonville parks and reserves have not seen a single podocarp planted.

Our Urban landscapes need endemic native canopy trees, and we want to see them planted there. We request that WCC urban planning ruled ensure that this happens, please.

#### F: City Resilience

This section of the UGP appears to narrowly focused: what about food security, community support, climate change - adaptation to sea level rise, infrastructure resilience (especially the three waters)? These all deserve more attention in the plan.

#### G: General or other comments

**1 – Timing of Consultation** This plan is a very important one, in that much of the critically important policy of the next three decades will be based upon it. As such, **we consider the consultation period of one month is inadequate**: most community groups – ours included – and individuals – have struggled to meet this short timeframe for such a wide-ranging plan.

We consider two months to be an absolute minimum for consultation on such a far reaching plan.

#### **2 – Scope and Quality of the draft Plan**

The document appears to be focussed on Principals, rather than outcomes. In this approach, there is (in many cases) insufficient detail to support the principals across the range of different areas that comprise entire city. The end result is a document that, while well intentioned, is waffley in some

areas and woefully and unspecific in others, without sufficient detail to appropriately cover certain geographical areas that will likely become important for the plan in future decades.

It is simply not good policy practice to accept a document such as this to establish principals which are so poorly supported by details of how they will be interpreted in the very different localities that comprise of Wellington City. For that reason (and others), we recommend that WCC do not consider accepting the plan in its current form.

We would far rather see the entire document focus on outcomes. This would anchor the plan to the real world in a way that this document really fails to.

**3- We take major issue with the population projections on which the entire plan is based.** We have serious concerns that the population estimates and demographic profiles on which the entire plan is predicated are badly deficient in a variety of ways. Because these projections are utterly critical to the appropriateness and workability of the plan, we believe that it is inappropriate to accept the plan at all unless and until these deficiencies are examined and resolved by a panel of experts, rather than by a single (overseas based) private company.

A recent example of planning decisions based on incorrect future predictions is the Johnsonville Town centre plan of 2008. That plan was implemented based on WCC's acceptance of what we view as manifestly impossible predictions that the numbers of people working in Johnsonville would increase by 3500 (ie, from 2300 to 5800, or an increase of a phenomenal 152%) between 2008 and 2031. After 6.5 years into that 23 year time span, there has been no significant job growth in Johnsonville; WCC bylaws stifled the growth of a much larger new mall, and any significant new retail growth (the core industry among projected job growth) seems increasingly unlikely as time passes. Yet MDRA planning regulations were introduced based (in part, if not largely) on those job growth projections. Despite these 2008 projections looking more wildly incorrect with each passing year, Council continues to base its ongoing planning decisions on what are clearly seriously wrong "growth predictions".

Despite our members continuing to point out to officials the deficiencies of the job predictions on which the Johnsonville Town Centre Plan was based, the plan remains unchanged 7 years after WCC approved it, and it continues to be a major foundation document for other policies, which in turn are based on those same bad predictions. The possibility emerges that these "poor" projections were deliberately falsified to justify planner's proposals (such as MDRA for Johnsonville), and that alarming possibility **highlights the need for plans to be regularly reviewed as the predictions on which they are based are revealed to be erroneous.**

Specifically, we take issue with the following regarding the population growth projections from Profile.id on which the urban growth plan is based:

a) **Wellington appears to be viewed in isolation,** rather than as part of a closely linked wider region. Despite Wellington being a city with three feeder cities (and commuters coming from over 100km away daily), it is noteworthy that WCC's population forecaster (Profile.id) appears to have no other clients in the entire country of NZ except WCC. We suspect that because they do not provide similar analysis for Hutt City, Porirua city, etc, they are not viewing the region as a whole, as perhaps they should.

The "elephant in the room" of Wellington City Urban development is that Wellington City has a very limited land supply, and very high land prices, and that Wellington is connected by very fast and efficient public transport with high usage rates (and rapidly improving national road networks) connecting commuters to a massive area of lower cost residential options (often with better natural amenities) to the north.

There is no question that, in the next thirty years, many will wish to live in higher density housing closer to Wellington City centre, and to all the cultural and entertainment attractions that the city centre enjoys. But the assumption that people are just as happy to pay the same high rental prices to live in similarly dense residential complexes 10 or 15 km from Wellington City centre in suburbs almost devoid of Wellington central's entertainment and "urban chic" appeal appears widely assumed by WCC staff - and yet is utterly unproven (and, we contend, false).

The fact that (say) Johnsonville is just as close (in terms of train commute time) as Porirua or Lower Hutt - areas of much lower property prices for much larger land area - appears to be lost on those who appear to be predicting Wellington's population growth "in isolation" from those cities.

b) **Net migration out of Wellington has been badly underestimated when projecting Wellington's future population.** Statistics from the last census show very high net migration away from Wellington in most demographic age groups (except in high school to initial tertiary student ages who mostly move to Wellington for education and /or first job starts).

Two of the four assumptions made by the forecast are highly suspect: there are as follows:

- Some loss of adults in late twenties and thirties (some family forming with children)
- Some loss of family age groups (0-9 and 25-39 years) as well as older adults and retirees (40-69 years)

The problem here is the detail behind the use of the word "some" - that represents a massive underestimation of how Wellington hemorrhages population after age 23. The figures used for forecasting future net migration away from Wellington City are unrealistically low, and very much lower than the historical figures (census 2006-2013) <http://profile.idnz.co.nz/wellington/migration-by-age> suggest are likely to occur. Rather than suggesting growth, these statistics show a net loss of 3000 people from Wellington over the last 7 years through migration. **The net effect of this miscalculation will be a total population growth over the 2014 - 2042 time window of much less than half that which has been used to base WCC Urban Growth Plan.**

Rather than migration away from Wellington reversing dramatically (as Population.id suggests) **there is every reason to believe that net migration out of Wellington City will be greatly accelerated by**

- **Housing affordability** - the ongoing increase in traditional "low density" Wellington housing prices relative to nearby (Porirua, Hutt Valley, Kapiti Coast) districts, - and this price differential will be exacerbated by the low level of new greenfield low density housing in Wellington City.
- **improved transport infrastructure** - people will be able to live outside Wellington, and commute into the city more easily.
- **less "need" for workers to be 'in the office'** to work (as technology use / broadband speeds increases)
- **less government jobs in Wellington City**, trend towards less government, more regionalisation, and more privatisation of "government" services - all reducing

employment in Wellingtons biggest employer, central government - will inevitably reduce employment growth in Wellington City.

- Christchurch "refugees" – who fled to Wellington in great numbers – returning to Chch once their city is rebuilt.
- Wellingtons low attractiveness for employers: Its no Auckland, so big employers shun it. And land / rents are expensive, so small employers cant afford to be based here.

Further, there seems to be little or no recognition of Wellingtons extraordinarily low (present & historical) level of aged persons (a much lower proportion of total population than in any other part of NZ - <http://demographic-indicators.idnz.co.nz/?submissionGuid=dcd89f5-a403-400c-8b67-814d7c56c3c2> ). What that means for Wellingtons migration patterns, and how that will manifest in future decades, appears not to have been considered at all. For so many people, Wellington is not where they were born & raised, and will not be where they intend to grow old: It's a place to live while they work only, and when they retire, they plan to move 'back home' to the provinces, or on to some (perhaps warmer?) climate.

This is not a reflection on Wellingtons 'liveability', it's just how people choose to live their lives, for their own reasons. It's a fact that after age 22, the net flight of each and every age group out of Wellington begins, it peaks at age 41, but continues (and in very significant numbers) right up until after age 85, when it finally reverses <http://demographic-indicators.idnz.co.nz/?submissionGuid=dcd89f5-a403-400c-8b67-814d7c56c3c2>.

Wellingtons high housing prices greatly exacerbate the economics sense of this exodus of the aging from wellington. Yet no mention of housing affordability appears in the UDP at all.

Consequently, The growth projections on which this UDP is based utterly fails to take that consistent and long-proven migration pattern into account to an appropriate degree. That omission is a critical flaw in the population estimates that underpin the UDP.

As a result, this Urban Design Plan seeks to take action to create an Urban Wellington for numbers and ages of residents who simply will not be here in thirty years. WCC keeps telling us "we need to create retirement housing options" (particularly MD housing) for an aging population, when all evidence shows many of those people will leave Wellington before they retire, and recent research shows that aging persons absolutely do not wish to move out of their "family home" as they age...

Because of the UDP is based on these incorrect assumptions, massive change to some areas (like MDRA zones), will be thrust upon suburbs needlessly, and because these changes are (especially in outer residential areas marked for MDRA zoning) pitted in opposition to market forces and/or demand, the result – rather than the "positive" redevelopment that is sought - will be less redevelopment of any sort, because development plans of individuals are thwarted by planning initiatives that promote different outcomes (ie, a planning blight).

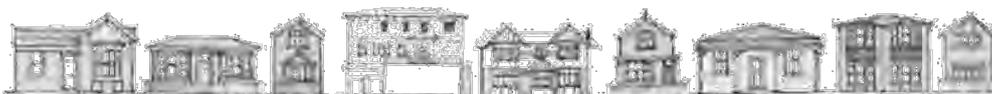
c) Population Growth estimates appear to ignore most recent Estimated Resident Population (2013) figures showing Wellington population is trending downwards <http://profile.idnz.co.nz/wellington/population-estimate> show a massive drop in Wellington's population in 2013. It seems incredible that, in the case of such a huge reversal in the trend of steady but modest population growth, WCC is now basing their Urban Growth strategy on a return to a higher rate of net population growth, when the most recent population changes suggest the opposite (ie, a population decrease) to be likely.

d) **The UDP lacks Direct and explicit detailing of how and where "lost" Development contributions will be recovered.** New development – whether greenfields, or redevelopment – puts huge costs onto the City, if current "liveability", resilience, capacity is to be maintained. If WCC is to reduce of Council's development contribution requirements, our fear is that this will have minimal stimulus on development, yet considerable impact on city capacity and amenities. Externalised costs need to be fully accounted and provided for in the WCC planning and reporting processes, and alternate means of recovering DC Monies (ie, a 20% higher rates rate for the first 10 years of a new dwellings lifetime) should be explored, so Ratepayers are not directly boosting developers profit margins without some recompense.

**Summary:** we view the decision to base an Urban Growth Plan based on high growth forecasts, when common sense analysis and statistics suggest a much lower growth rate is more likely, as being deeply flawed.

**Recommendations 1** *We therefore request this Urban Growth Plan is suspended until the assumptions on which growth projections are based can be thoroughly reviewed by independent third parties.*

**Recommendations 2** *If the UDP is accepted, we urge WCC to formally incorporate 5 yearly reviews (aligned with the year following the national census) to this and all other WCC policies which are so heavily predicated on such "suspect" population assumptions. This would represent "best practice" and prevent the possibility of bad decisions being perpetuated long after evidence of their "insubstantial" emergence.*



### Mt Victoria Residents Association

P.O Box 19056, Courtenay Place, Wellington.

13 October 2014

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#### **Submission on draft Wellington Urban Growth Plan 2014-2043**

The Mt Victoria Residents' Association Inc is a local community group whose objectives include contributing to the wellbeing of residents by encouraging a community spirit and sense of unity, and protecting the quality and heritage values of the built and natural environment of Mt Victoria. Our submission focuses on a few key aspects which we believe are integral to progress towards the Council's stated goals for Wellington: a people-centred city, a connected city, an eco-city, and a dynamic central city (*Wellington Towards 2040: Smart Capital*).

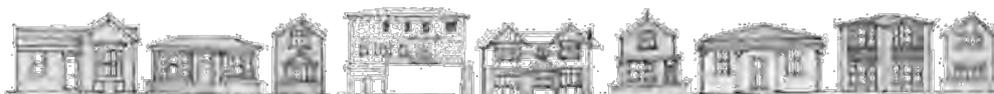
#### **General comments**

- The consultation brochure lists 28 Council policies and plans, and several others within the text to which the urban growth plan contributes. This excessive number suggests compartmentalised thinking, and much time-wasting on preparation, coordination and monitoring which could be better spent on action.
- Although the title of the draft Plan suggests long-term thinking to 2043, most of the projects and actions listed appear to be either short- or medium-term so they can be included in the 2015-2025 Long-term Plan. We suggest the time horizon be shortened to more realistically reflect what is in the draft Plan.
- We note the major challenge that key elements of the draft Plan, housing and transport, are dependent on central and regional government for funding and their development is dictated by these funders (discussed further below). We urge the Council to strongly oppose such developments where they are contrary to Wellington's goals.
- To continue to be people-centred, connected, eco, and dynamic as Wellington's population grows requires three elements to work together - residential and commercial development, natural and other open space, and transport.
- We would like to see more emphasis in the draft Plan on health and climate change (see below).

#### **Health**

Without good health, people are less able to enjoy their lives, their options may be limited, and they are also less likely to be able to contribute to the economic, social and cultural life of the Wellington. We are concerned that Greater Wellington's Genuine Progress Index (GPI) indicators in the area of health show the region's people have experienced an overall decline since 2001. This is unacceptable, particularly as increasing residential development within the inner city increases the

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### Mt Victoria Residents Association

numbers of residents who are vulnerable to the intensified effects of noise and air pollution from vehicles.

There are known health risks from use of diesel-powered buses, especially to young people, severe enough to warrant a decrease in the use of diesel buses, rather than a removal of the current electrically-powered buses from Wellington streets. Air pollution, and in particular diesel particulates, are strongly implicated in causing or contributing to asthma in children.

The 2013 report, *The Cost of Physical Inactivity*, co-authored by the Regional Council, estimates the cost to the Wellington region and whole community in 2010 from physical inactivity at \$141 million. The report refers (pg64-65) to the important role local government can play in addressing the financial and health costs of inactivity through urban design, transport planning, development of pedestrian and cycling infrastructure, and use of parking charges as a disincentive to private car use.

Smart urban design and transport planning provides an opportunity to encourage people towards more active journey modes and to reduce private car use and dependence on fossil fuels. This will require major improvements in walking and cycle safety, in electrified public transport, and in building design.

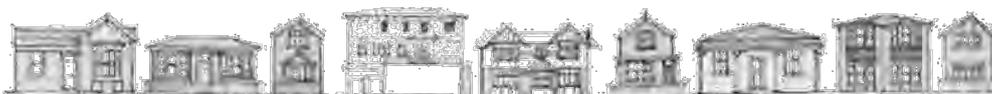
#### **Climate change**

Climate change is mentioned in the draft Plan, but mostly in the context of managing the negative impact of it, rather than doing something about it. We note the draft Plan supports reduction targets for greenhouse gas emissions (page 19) and includes two projects (page 60) on low-carbon public transport and buildings, and sustainable buildings. In light of the excellent information available via Victoria University, the Council's planned efforts appear woefully inadequate, and its support of motorway projects completely undermines any greenhouse gas reductions elsewhere.

#### **Residential and commercial growth and development**

The Association agrees with residential and commercial growth occurring in the central city and along the 'growth spine', albeit a 'spine that divides at the southern end towards Adelaide Road and Kilbirnie. While Johnsonville and Kilbirnie are naturally separated from the central city by hills and the Town Belt, we believe Adelaide Road should be considered part of the central city and the east-west streets from the Mt Victoria tunnel to the west do not become a major dividing line through an area of major heritage significance. A broader question is why these local streets are even considered 'SH1'.

We also agree that urban development, whether by new building or improving existing buildings, should be energy-efficient, water-sensitive, well-designed, and earthquake resilient. Development must also preserve heritage values and existing neighbourhood character. Any changes to the District Plan to enable residential intensification must take into account the need to preserve planning rules regarding site coverage and sunlight planes in already intensely-built areas such as Thorndon and Mt Victoria.



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As New Zealand's capital city, Wellington is fortunate in being the kaitiaki of heritage of national significance eg. Parliament buildings, the Botanic Gardens and Carter Observatory, the cable car, Government House, the War Memorial and the Basin Reserve. Urban development in their environs must be sympathetic to their heritage status.

For the Mt Victoria area in particular, we suggest your actions should include a heritage audit of Mt Victoria, proper enforcement of existing demolition and design rules in the area, and better information for real estate agents and developers on heritage and neighbourhood character preservation and rules.

We do not agree with the greenfield growth areas to the north of the city. They do not support keeping Wellington compact and connected, but rather contribute to dormitory-suburb sprawl which is likely to increase dependence on private car use to access jobs, goods and services, with its consequent negative impact on our eco-city goal. A better alternative is for other suburban areas to the east, south and west of the central city to be considered for residential intensification, as indicated on page 54 of the draft Plan. These areas are already close to natural and other open space, are within walking, cycling and public transport distance from the central city and have community services.

As noted in our recent submission, we oppose development of a new convention centre and new concert venue. The proposal lied about the real cost to ratepayers – it's \$2.5 million per year over 20 years is far less than the \$92 million reported (*Dominion Post* 29 September 2014). Nor is it reassuring to read a failed finance company director is involved in the project. We agree with Glenys Coughlan, CEO of PWV, in her article in the *Dominion Post* (8 August) where she states "Positively Wellington Venues has six amazing venues, each within a five minute walk of each other ...". The Town Hall and Michael Fowler Centre are excellent concert venues, and funding otherwise wasted on a new convention centre should be directed to strengthening the Town Hall and promoting the six Council-owned venues as part of developing the Civic Centre.

#### **Transport**

Wellington is attractive to live in and visit because it is a people-centred city whose compactness encourages active transport modes (walking and cycling). Our point of differentiation from other large New Zealand and Australasian cities is our relative lack of alienating and polluting motorways and flyovers slicing through our city. Planners still have a real opportunity to keep Wellington that way for both residents and visitors, who are an important aspect of its economic and social life. The Te Papa report for 2012 states that visiting Te Papa is the second thing visitors to Wellington do after walking the city streets.

We are very pleased to see (page 7) that priority appears to be given in the Executive Summary to walking and cycling, then public transport and lastly to roads. We regret that this order of priority and the strategic emphasis placed on being people-centred and eco is not carried through to the projects and actions. Projects clearly still invest heavily in major road developments (see below) and favour vehicles rather than active modes in road space allocation.

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**Mt Victoria Residents Association**

We agree with projects and actions to improve cycling networks and safety, and pedestrian accessibility and safety. We suggest adding "make Wellington a great place for walking" to the goal (top of page 47). In addition, we would like to see a stated commitment to investment in walking and some measurable standards, not just planning, monitoring and review. We suggest plans separate walking and cycling as they do not mix well. In addition, we suggest vehicle lanes on key routes are converted to cycle lanes, as has occurred in New York City. We also agree on delivering the Great Harbour Way and suggest that happen all the way from Red Rocks to the harbour entrance.

We also agree with plans to encourage more public transport use and energy efficiency. The decision to scrap the trolley buses was a retrograde step because they are already electric and will be replaced by diesel buses, or at best hybrid. We urge the Council to implement a fully-electric service as soon as possible, and in the meantime to properly monitor diesel emissions in the central city. We also urge that the public transport spine corridor through Mt Victoria continue to be the bus tunnel, not the Mt Victoria tunnel.

Serious consideration needs to be given to long-term investment in a light rail system in Wellington City – it was included in growth spine options but overpriced by incorrectly including the cost of a second tunnel. In the long term it is the only real public transport option that meets Wellington's goals. Population size is not a barrier - French cities such as Tours (population 135,000) and Montpellier (population 255,000) have similar populations to Wellington City and excellent light rail systems. In developing the draft Plan there is still time to revisit this short-sighted decision, or at least keep open other electrically-powered options.

We are particularly dismayed at, and strongly oppose, the draft Plan's including completing the Wellington so-called roads of national significance. The NZ Transport Agency's continuing obsession with spending enormous public monies on more motorways such as the Basin Reserve flyover, Kapiti expressway, Petone to Grenada link road, and Transmission Gully is completely contrary to Wellington's goals. We were also very concerned to note in the Regional Council's draft public transport plan that central government aims to limit annual increases in public transport funding and reduce funding for public transport infrastructure. We urge the Council to join with the Regional Council and take a much firmer stand so Wellington can avoid the Auckland fiasco.

The Basin Reserve flyover has already been rejected by a Board of Inquiry and the Council should be investing its energy and resources instead in developing a ground level improvement such as the BRREO (Basin Reserve Roundabout Enhancement Option) option. This option includes improvements for pedestrians and cyclists. The leader of the Council's *Toward 2040: Smart Capital*, Jan McCredie, was one of the expert witnesses opposing the flyover on urban design grounds.

We fully support the plan to discourage provision of commuter parking in the central city and to promote park and ride at train stations.

**Natural and other open space**

Increasing residential and commercial development in the city must be supported by easily-



### Mt Victoria Residents Association

accessible public open spaces if Wellington is to continue to be people-centred and liveable. We are pleased to see the plan aims to enhance the city's green infrastructure (parks, open spaces, landscaped areas) – this should include increasing the number of open spaces, plus shade and seating. In doing this, we urge the Council to give priority to 'green' ie. a mix of trees, vegetation and grass over concrete and paving as it facilitates rain absorption and trees provide shade. We suggest also the need for more children's playgrounds. We also suggest public consultation over enhancements so the infrastructure accords with what people want (as is currently occurring for part of Mt Victoria/Roseneath Town Belt area).

As two of the largest open spaces, the waterfront and Town Belt must be maintained for free public access, and should not be privatised through buildings for businesses and sports clubs.

#### **City resilience**

The draft Plan does not appear to include any projects or actions to ensure there is adequate community support in the event of a major disaster. We do not believe that a centralised disaster management office will have the capability to respond adequately to people's urgent needs. It is therefore most likely that communities will be left to fend for themselves. Mt Victoria residents have in the past been involved in a civil defence network and training. We suggest the draft Plan include provision for community-based support for response to disasters.

Craig Palmer, President

Draft Wellington Urban Growth Plan 2014-2043 – Feedback from Mt Cook Mobilised

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This submission has been prepared on behalf of Mt Cook Mobilised, a group which represents residents of Mt Cook, and is affiliated to the Newtown Residents Association.

The suburb of Mt Cook is a short walking distance from Cuba St and Downtown Wellington – it has a mixture of old heritage/character housing, and high density apartment dwellings, as well as “social” housing, with both Housing NZ and the Wellington City Council providing high-density accommodation in our suburb. The population of Mt Cook is diverse, multi-ethnic, and ranges from established residents of 20+ years, to new migrants and a transient student population, from seniors to a growing number of couples with young families. Mt Cook is also a major commuter route. It is bordered by high traffic roads such as Arras Tunnel and its extension into Karo Drive (which constitute State Highway 1), and Wallace Street which runs through the middle of the suburb into Taranaki Street and carries more traffic than Adelaide Road (the main route from the Mt Victoria Tunnel to Wellington Hospital). These streets are juxtaposed alongside pedestrian walkways which help promote walking as Mt Cook’s first choice in transport. About 30% of our households do not own or run a private motor car, and a high proportion of all residents are commuters.

We have read the draft Urban Growth Plan, and its executive summary. In general we thought that the plan is a very important and useful document. We like its emphasis on six focus areas: Transformational growth areas; Liveable and vibrant centres; Real transport choices; Housing supply and choice; Natural environment; City resilience.

We would in particular however like to comment on an aspect of the transformational growth area focus that is described in the Plan. This is the Adelaide Road Framework.

In 2008 Mt Cook Mobilised made a submission to the City Council about the then draft Adelaide Road Framework. We attended, and presented our submission to, a Council Committee meeting. We have however not received much feedback on our submission, and indeed in the intervening years there has not been much evidence that the framework has resulted in much if any improvement to the Adelaide Road environs.

We supported the overall vision outlined in the Draft Adelaide Road Framework, subject to the addition of some additional wording at the time.

*A high quality mixed-use area that is a more vibrant, attractive, better connected, accessible and safer place accessible and safer place which meets social needs for all people living in, working in, and using the area.*

We also supported the proposed outcomes of providing for greening of the area, quality public spaces, and strengthening connections between open spaces; strengthening the local community; Improving the Adelaide Road transport corridor for multiple forms of transport.

However we did note some concerns in our submission. For example:

1. Pedestrian and cycle access to Adelaide Road from the west needs to be improved, with wide, well-lit people-friendly boulevards. There needs to be more obvious signs or indications that walkways lead somewhere
2. We strongly supported the suggestion of an access route from Adelaide Rd up to the Town Belt between Government House and the hospital (or between Government House and Wellington College).
3. We were (and remain) concerned about the intensification of the Adelaide Road area, when we have seen no traffic projections and management scenarios that help us understand how foreseeable congestion and safety issues will be dealt with. We still want to ensure that the Council does indeed undertake traffic projections for the Adelaide Road area, incorporating flows to and from the area through peripheral traffic routes such as exist in Mt Cook (Hutchison Road, Bidwill Street etc.). This is in order to allow residents to assess the impact on their neighbourhood of changes in traffic flows resulting from the proposed development in Adelaide Road.
4. There needs to be greater provision for play spaces for children, located where people are likely to congregate, e.g. for shopping, and places where people can stop, sit and talk.
5. We asked to be involved in the identification of character areas and buildings in particular. Mt Cook Mobilised remains keen to work closely with Council in developing a suitable guide that allows for:
  - More stringent protection of some heritage structures / locations
  - The context-sensitive adaptive re-use of character buildings
  - The construction of sustainable modern structures that appropriately reflect the sense of place<sup>1</sup> we want to establish in the Mt Cook.
6. We expressed some concern about the prospect of intensive residential growth along the northern part of Adelaide Road.
  - In Adelaide Rd, we perceived a risk of two "walls" up to 24 metres high, with shade problems, wind tunnel effects, blocking views, etc. We want to see view lines (using 3D modeling) to get a better sense of the impact of proposed developments.
  - Also the proposed height controls (6-8 floors) exceed by a big margin the building heights recommended for Urban Center zones (3-5 floors) in new urbanist design codes<sup>2</sup> being widely adopted in the US to guide urban redevelopment. This makes the case for retaining existing height controls (4-6 floors) in order to maintain a sense of scale appropriate to the community setting.
  - If Council continues to plan for a 6–8 story height limit, then we would like to see how buildings could be sensitively designed at this upper height limit (e.g. use of staggered frontages – recess lines, and light wells and forecourts) to reduce a sheer wall effect.

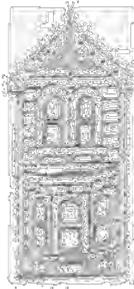
<sup>1</sup> See 'Smart Growth Principles', <http://www.smartgrowth.org/about/principles/default.asp> including Sense of place: <http://www.smartgrowth.org/about/principles/principles.asp?prin=5>

<sup>2</sup> In keeping with the new urbanist principle that the neighborhood is the basic unit of urban form, the SmartCode provides design criteria for streets, blocks, open spaces and buildings based on their geographic location from rural preserve to urban core. Municipalities can adopt the SmartCode as a replacement for aging zoning ordinances. <http://planningwiki.cyburbia.org/SmartCode> See Smart Code 9.2 downloadable from [http://www.smartcodecentral.com/smartfile/v9\\_2.html](http://www.smartcodecentral.com/smartfile/v9_2.html)

- We want Council to ensure that new developments really reflect the framework and achieve the overall outcome: that designs fit with the overall framework and the surrounding context and complement existing buildings. Developers should not be permitted to build just because they comply with specific District Plan parameters, if their designs cannot contribute to the overall effect the framework has been created to achieve.
  - On the Tasman Street boundaries of Zone Two (discretionary height up to 18 metres), the character housing on the other side of the streets (including Tainui, Ranfurly, Howard St etc areas) should not be dominated by 5 or 6 story buildings facing on to Tasman Street. Such protections should be incorporated into the current District Plan, given that it appears to allow up to 6 story structures to be built in this Zone Two area. In addition to the Tasman Street boundary with the mixed use area, in Douglas Street there are character houses, and on the other side of the street there is the potential for 6-8 story high commercial buildings (currently a vacant lot).
  - We encouraged Council to ensure that the Adelaide Road Framework should allow for a suitable transition zone between character residential and multi-story residential/commercial that is more than 5 metres of road asphalt. There are other areas where the planned intensification of usage butts up against current low level residential housing, and across the whole Mt Cook area there should be suitable controls in place to ensure that there is not a harsh boundary between the two usages.
7. We proposed there be a process of systematic evaluation of the proposed plan, noting that Mt Cook Mobilised has some capacity to assist with suitable evaluation design, and we want to participate usefully in such processes.
8. We invited the Council to include Mt Cook Mobilised in the development of community-centred design guides. We expect such design guides to be given explicit weight in the planned review and amendment of the District Plan design criteria and guidelines.
9. Parking. The Urban Growth Plan refers to parking in the central business district and the effect of its availability on trading. It also reinforces Council's support for car share plans. Wallace Street in Mt Cook is a narrow street where a cycle lane and/or bus lane may be planned. Consideration needs to be given to providing some alternative parking spaces for residents if parking is removed along Wallace Street. (e.g. Upper and lower Carrington Street are no exit streets where angle parking may be feasible; the car park at Te Whaea is a generous size, one suggestion is that an investigation could be done into allocating some parking places for residents of Wallace Street.)

#### Conclusion

Most of the comments made above were also contained in our submission in 2008. We continue to hold these concerns and ask that both in consideration of the draft Wellington Urban Growth Plan, and in implementation of the Adelaide Road Framework, that the Council listens to these concerns and adapts the plans and their implementation accordingly.



**Newtown Residents' Association**  
[www.newtown.org.nz](http://www.newtown.org.nz)

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13 October 2014

## Urban Growth Plan Submission

### Introduction

The Newtown Residents' Association is the Incorporated Society representing the suburbs of Newtown, Berhampore, Mt Cook and parts of Melrose. We are an active local group of residents and businesspeople, concerned with maintaining and improving our suburb's liveability, connectedness and sustainability. For 100 years our organisation has worked actively to make our community a thriving, diverse, great place to live. We care passionately about the design, function and ecology of our urban and natural environment.

### Submission

The Newtown Residents' Association strongly supports the overall concept of the Urban Growth Plan.

Our Association has a long history of supporting well planned initiatives that increase the density and live-ability of Newtown, Berhampore and Mount Cook, particularly along the Riddiford Street - Adelaide Road corridor linking to the CBD. Greater residential density in our community makes our amenities, shops, supermarkets, cafes, schools, clubs and public transport all more viable.

The urban growth plan pulls together a package of initiatives that we as an Association have a long history of supporting, such as the Adelaide Rd Growth Centre, Public Transport Spine Corridor, Ngauranga to airport priority link, Cycleways, Suburban Centre intensification, Te Aro intensification, natural environment protection - Town Belt, Southcoast, and Lampton Harbour, emergency preparedness, Heritage protection, compact city...

On behalf of the Newtown community, and on behalf of past citizens and future citizens of Wellington, the Newtown Residents' Association thanks you for continuing to consider the same long term way this initiative will be delivered. Consistency and refinement are important to the success of this initiative.

For instance the future dedicated transport corridors (bus & cycle lanes) will have a huge impact on our community. Pedestrian safety and car parking in residential streets along the public transport and cycleway spine will be important to craft successfully. This impact has been underplayed in the document. The Urban Growth Plan talks about ways of influencing car parking for businesses in the city, but the impact of bus and cycle lanes on residential parking is not discussed. For Newtown, Constable Street and Wallace Street are both main transport corridors that are part of the public transport and / or cycleway spine within a residential streetscape. Effort needs to be put into thinking about this residential setting and its interface with priority for public transport and cycleways. Parking spaces relatively close to residences will be important to the success of these initiatives fitting our communities.

## Conclusion

The Urban Growth Plan will transform overtime how Wellington citizens live and thrive in this part of our city.

The Newtown Residents' Association approves of the WCC councillors and its officers giving this framework a refresh and consultative refinement, but we would like to comment that our members feel the consultation period has been too short to allow us to fully discuss this as a community and develop detailed fine grain feedback. This has been too short for the newer members of our community to understand the backstory as fully as our older members do.

Our Association hopes that ongoing consultations will be held as aspects of this are developed in greater detail. Fine grain fit to community will be important as aspects of this are crafted, taking local knowledge on board and valuing its expertise, will be very important for our ongoing support.

The Newtown Residents' Association would like to be heard in support of this succinct submission. Please do not hesitate to contact me at [martin.hanley@nwv.ac.nz](mailto:martin.hanley@nwv.ac.nz), or on 389 7316 if you would like our Association to provide more detail on this important Wellington issue.

Yours sincerely



Martin Hanley  
Newtown Residents' Association  
Past President  
Newtown Festival Director  
Chair, Cycleway Sub-committee

## Wellington Urban Growth Plan

1.

**First Name:**

Mike

**Last Name:**

Foster

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**Suburb:**

**City:**

Whangaparaoa

**Phone:**

**Email:**

mike@zomac.co.nz

**I am giving this submission:**

on behalf of an organisation

**Organisation name:**

Progressive Enterprises Limited PEL

**Your comments on the draft plan:**

PEL is one of NZ's two leading supermarket operators and currently has 14 supermarkets in the Wellington Region. Across NZ, PEL has 171 supermarkets trading under the Countdown brand. It is also the franchise co-ordinator for the Fresh Choice and Super Value groups which have 59 supermarkets. PEL employs around 18,500 people nationwide (excluding employees of the franchise stores) making it one of the country's largest employers.

PEL actively participates in regional and district plan processes under the Resource Management Act and in, on an as required basis, Annual Plan and long term plans under the Local Government Act.

PEL and its advisers have read the draft Wellington Urban Growth Plan and endorses and fully supports the key outcomes being sought in the Plan. In particular, it considers the emphasis on more intensive residential and commercial development along the "growth spine" between Johnsonville town centre and the airport via Kibirnie to be very soundly based from a resource management perspective.

The identified greenfield growth areas of Uncolnshire Farm and Stebbings Valley are supported, but it does not appear that any consideration has been given to the need to provide for future retail development to serve these areas. PEL suggests that some further thought needs to be given to this issue.

Finally, should Council have any queries regarding this submission please do not hesitate to contact the undersigned.

Yours faithfully,

Mike Foster

on behalf of Progressive Enterprises Ltd.

Email received in submission for the UGP 09/10/2014 in response to David Mitchell:

Hi David,

That pretty much covers it. If you could register that as our feedback (Best Farm Ltd and Hunter Hill Ltd) that would be appreciated.

Rod

Rod Halliday  
Principal Planner  
Halliday Resource Management Ltd

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On 09-10-2014 12:03, David Mitchell wrote:

Hi Rod,

Thanks for the discussion this morning. I thought I would briefly reflect the key points that you wish to provide feedback on regarding the Plan.

- You generally support the plan, and it is predominately information that you know.
- You would like greater support and elevation of the issue of clusters of medium density housing along transport routes, specifically in greenfield areas. This is not seen as something done through MDRA zones but rather through the consenting process.
- The concept of an eco-village needs work and is likely to be very difficult to achieve. The Plan should reflect this and be re-worded to say that an eco-village may be one concept following further feasibility work.

- You would like North / Upper Stebbings to undergo a zone change (UDA or Outer Residential) before the structure planning process. The structure plan with a rural zoning underneath is not a commercially workable solution for you. The current timeframe is for that area to begin development (meaning all planning has to be done before then) in approximately 10 years.

If you have any other feedback please let me know, or clarify anything I have missed here. Also, my contact details are below.

Regards,

**David Mitchell**  
Spatial Planning Advisor | Wellington City Council  
P 0438 9710 | M 021 242 202 | F  
E David.Mitchell@wcc.govt.nz | W Wellington.govt.nz

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09 October 2014

Wellington Urban Growth Plan (COP002)

Wellington City Council (CAB2)

PO Box 2199

Wellington 6140

To whom it may concern,

Wellington Urban Growth Plan - Feedback

We have read the draft Wellington Urban Growth Plan and support the principles contained within.

In particular we agree with the need to provide a focus on delivering quality medium-density housing to ensure that there is enough supply for the population growth expected in the city.

Being a 'compact city' and with more people expected to live in the central city, we encourage the need for high quality development where residential growth is to occur.

We support Wellington City Council's action plan to work with architects, developers and other development professionals to improve best-practice apartment and multi-unit development. We are experienced in the delivery of multi-unit residential properties both here and in Australia and believe we can offer a lot in the assistance of reviewing the Multi-Unit Design Guide. We reference the likes of NSW Residential Design Code as a good document for comparison.

We are interested in how this high level policy will work from an operational side. What strategies will be put in place to ensure the internal mechanisms of WCC will allow these visions to be implemented? Experience has shown that the internal structures of WCC do not necessarily facilitate the vision created at a political level. We would like to see appropriate changes made to ensure this Urban Growth Plan can actually work in reality.



In terms of encouraging greener building standards we believe there needs to be some form of incentive to make this happen, as more often than not, and especially in development, the cost of going green outweighs the benefits. We believe that greener buildings will reduce the impact on the regional infrastructure, which is a benefit for the Council, but developers need to be encouraged by a financial trade-off.

Overall we support the ambition of Wellington City Council to develop this growth plan. We are very interested in any future involvement we can have, both at the high level of providing feedback/input on the plan itself, and in delivering quality design solutions at an implementation level.

We look forward to the progression of this plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read "James Solari".

James Solari  
Managing Director

## Wellington Urban Growth Plan

1.

First Name:

ian

Last Name:

cassels

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city

City:

Wellington

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I am giving this submission:

on behalf of an organisation

Organisation name:

The Wellington Company

Your comments on the draft plan:

The plan understates likely population growth if we succeed. Concentration of effort needs to be on the intensification of Te Avo - not on the growth spine. Transport through the city must not be via diesel powered suburban bus - it must be electric and accompanied by enhanced pedestrian and cycling use. Heritage is an essential part of the city's trading capacity and must be properly supported via rates and finance facilitation. Whilst Wellington slips vs other NZ Cities, the Airport expansion is mandatory.

I would like to be heard:

ian Cassels

## Wellington Urban Growth Plan

1.

First Name:

Ron

Last Name:

Beemink

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Suburb:

Island Bay

City:

Wellington

Phone:

0279367557

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ron.beemink@gmail.com

I am giving this submission:

as an individual

Your comments on the draft plan:

Below is my submission on the Urban Growth Plan:

General comments:

- Overall the plan is very comprehensive and well presented.
- A key concern is that a number of issues discussed should be considered from a wider regional perspective than just Wellington, particularly with a potential move to a 'super city'.
- The other aspect not adequately covered by the plan is how the ageing population of the 'baby boomers' will put a pressure on the housing market, with an expected demand for smaller lower maintained apartments in or close to the city, and a declining demand for the larger properties in the suburbs.

The following are comments specific to sections of the plan:

- Page 24 - Transport and movement: should call out the need for a comprehensive plan for a cycling network based on best practice guidelines.
- Page 25 - Commuters traveling into the city: it would be good to break the motor vehicle travel down by types of use and in particular highlight the opportunity to discourage private car use as a commuting option, freeing up roads for essential traffic (public and commercial).
- Page 28 - Maori heritage and partnership: recommendation that this highlights the opportunity for projects like Great Harbour Way to make the most of our coast and harbour, including promoting the Maori heritage.
- Page 34 - Activate the development of identified growth areas: should include making Cuba Street a walking and cycling priority route similar to what is already in place for the north end of Cuba street.
- Page 37 - Support the development of the port and the airport as economic hubs: the port development is in fact modelled on the port developments in Auckland, specifically allowing for apartments development. It needs to however take into consideration impacts of global warming.
- Page 39 - Deliver improvements in the central city and key centres: there may be a possible opportunity for current MSD campus to be replaced with residential living area.
- Page 41 - Plan for future investment in suburban centres: this should call out the opportunity to establish cycling connections to these shopping areas to minimise dependence on cars. This needs to include an action to make roads around shopping areas low speed shared roads.
- Page 44 - Make Wellington a better city for cycling: the action to update the Cycling Policy should include adopting a set of guidelines for cycling infrastructure. The increase in recreational cycling should include the following actions:
  - promotion of the annual Ciclovia event and Living streets events
  - making GHW coastal routes a 30km/h slow speed shared roads
  - introduce car free Sundays during summer months for the Miramar Peninsula
- Page 48 - Encourage more public transport use: This needs to look at keeping fares to a minimum to ensure continued uptake in particular for people on a benefit.
- Page 51 - Manage parking more efficiently: This should look at the option of applying pricing tests for near city office blocks to discourage unnecessary convenience car travel.

Ben Beemink  
58 High Street, Island Bay  
Wellington

## Wellington Urban Growth Plan

1.

**First Name:**

Andrew

**Last Name:**

Bowman

**Street Address:**

63 Brougham Street

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Mt Victoria

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**I am giving this submission:**

as an individual

Your comments on the draft plan:

I support the broad direction of the draft Plan. Intensification on Te Aro Kar and up Adelaide Road is a sensible approach to maximising the value of Wellington's constrained flat land. It is also consistent with an approach that seeks to deliver higher populations in more concentrated areas, and thus maximise the value gain from ratepayers' infrastructure investment in these locations.

The success of this approach, however, is strongly dependent on the quality of the implementation. The Plan will only succeed if appropriate levels of resources are put into the planning, design and construction of the public spaces to support the intensification.

The key outcome of "A city with a nature" is a laudable outcome, however, Wellington City has quite a mediocre record to date of achieving this outcome in urban suburbs and the CBD. The ratepayers in the city and in urban suburbs – generally paying very high rates because of Wellington city's progressive rating structure – deserve much better.

Examples such as Wairangi Park showcase the value of high quality public spaces which are popular and highly successful. Good sustainable design principles have been used to underpin a public space which delivers for many subsets of Wellington's residents. This space, while extremely expensive to construct at the time, has quickly proven to be an example of good quality design delivering value, as opposed to a focus on cost.

The developing Kumutoto Precinct is also an example of high quality design resulting in urban spaces that people want to use. This requires good landscape architects working with good planners to achieve the vision. It also requires high levels of commercial support – the worst thing that could have happened in the Kumutoto Precinct would have been for Wellington Waterfront Works to have succeeded in banning any commercial development. People want a mixture of public spaces with amenity – such as cafes, galleries and other public-private spaces, not barren green space that provides little interaction with the city around it. Wellington's residents don't go into the CBD for empty green space – we have plenty of that around the CBD, and it does not represent best practice in urban design.

An example of this occurring poorly is the development of the "park" at the top of Courtenay Place. While the redevelopment of the former men's public toilets at the intersection of Courtenay Place and Taranaki Street is a highly successful piece of architecture cleverly repurposing a disused public facility, the surrounding public space is a dreadful example of a thoroughfare that is poorly designed and uninviting. The design fails to account for Wellington's wind or for the hordes of drunken people that frequent Courtenay Place three or four nights a week. The planting – or rather the lack of planting in the "park" makes it cold and uninviting. Urban art is poorly integrated and placed in an inappropriate location, generally such that no one sees it. The trees were badly specified – deciduous trees in an area with no other plants results in a very uninviting lifeless environment for six months of the year. The size of the trees also means they were never going to survive the hostile environment of drunk people on Saturday night, and the state of the "park" now is testament to the value of established tall trees to survive this location.

I fear that this kind of development will occur in the Council's flagship Victoria Street project. The picture showing an example of what Victoria St could look like does not inspire confidence that people with sufficient vision and skill are involved in this project. Previous experience suggests that the Council will not plant trees of sufficient maturity to achieve this image. The complete lack of any other kind of planting also suggests that the Council is poorly served by planners and landscape architects that have little comprehension of what high quality, sustainable urban design looks like, or can offer to urban dwellers. Wellington City Council would do well to look at what has been achieved in Auckland's Wynyard Quarter as a shining example of high quality, successful urban design that integrates environment and commerce artfully, making a highly desirable, commercially successful urban space that supports densification.

Some specific comments:

- Agree that MFC carpark is a wasted space. This could be a lovely mixed use public space with some commercial opportunity incorporated on what is very valuable land, rather than a car park (admittedly one that is surrounded by nice mature trees and well maintained gardens).

- The focus on "improving" Lower Cuba Street is confusing, since it is not long since it had some millions of dollars spent on it creating the failure that it now is. This is another example of poor design by planners, landscape architects and transport engineers failing to create a design that achieves the outcomes the Council claims it desired – a pedestrian focus. Shared spaces require good visual cues so drivers and pedestrians know how to behave – Lower Cuba Street looks like a long, straight road, and hence motorists behave as if it is one. Poor tree selection again, with specimens unable to cope with the treatment they receive from passers-by, and once again, the Council has selected non-native trees at odds with the Biodiversity Strategy. The Council should not be using the same design ideas again!

- Te Aro Park needs significant redevelopment – it has been a failure ever since it was redeveloped from Pigeon Park. Slippery tiles and a complete lack of plants make this an ugly space that is also dangerous. Drainage is insufficient for the grass to grow well, so either the drainage needs to be completely upgraded, or the grass removed and attractive, low maintenance native plants used. This would also support the Council's other strategies on biodiversity and Greening Central Wellington. The redevelopment of Cobblestone Park on Viator Street is a good example of a well-designed, well implemented design that is sufficiently robust for the urban environment. It seems likely that one of the main reasons for the success of the trees in this park is that they were already mature specimens. This is something the Council really needs to learn from if it is to stop wasting ratepayers' money by planting street trees that are too immature to survive the urban environment / drunk vandals.

Transport components:

The Council has for quite some time now taken a pro-public transport stance in its strategic documentation, however appears unwilling or unable to actually implement this strategic focus. The so called bus lane at the top of Courtenay Place is a good example. This is not actually a bus lane, but a clearway for a few hours a day and despite the best efforts of low speed drivers, there are still many occasions when private vehicles block this bus lane. The bus stop is too short to function efficiently, frequently leaving buses queued down Courtenay Place, and passengers dodging vehicles and cyclists when boarding or alighting from buses that are not actually at the bus stop.

If the Council actually wants to promote public transport in the CBD through its infrastructure provision role, then it should actually do a proper job of this – once again, the Council fails through poor implementation. In my previous example of Courtenay Place – just get on with it and remove the 5 or so car parks that run down Courtenay Place from the intersection with Taranaki St to the bus stop at Reading Courtenay Central. Removing the other car parks through to Tory Street would then make this a bus lane in fact. Parking is not required in this location with so many parking buildings in close proximity. The current situation is inefficient and shows a ridiculous inability to implement an agreed strategic plan. This represents a gross misuse of ratepayers' money – either implement the plan properly to create the functionality needed for a fast, efficient public transport corridor, or don't spend any money on it. The current half-hearted approach results in much cost to ratepayers and little benefit to public transport users.

## Submission on draft Urban Growth Plan – Isabella Cawthorn

---

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General statement:

This Plan demonstrates by far the best approach to urban development and transport that I've seen from the Council in recent years.

The points below (with sections of the document in CAPITALS) outline improvements to this good plan, and urge more specifics to be incorporated so it has a fighting chance of being implemented.

I do not wish to speak to my submission.

### TRANSPORT

1. The transport section of the plan reads very well. It's great to see the focus on "recalibrating" the city and Council's activity away from its current unhealthy (and outdated) car-centrism.
2. The sustainable transport goals are good – particularly the increased (if unquantified) statement about increasing the proportion of people using active modes by 2043.
3. It's excellent to see the road user hierarchy and the need for a new approach to parking - great stuff. Implementation will be the pudding where we'll look for proof!
4. Without SMART objectives and goals that incorporate the hierarchy into operational strictures (see below), it's more likely than not that this Plan, like its predecessors, will have little to no impact on how City Networks actually do business. This will be to the city's cost for two reasons:
  - a. First and foremost, because the Plan and its hierarchy establish a course-correction in transport planning that Wellington has direly needed for many years.

b. The second reason is that for cycling, unusually high amounts of available funding (both at a city and national level) create a window of opportunity. But practice to date indicates that without a course-correction in attitudes and incentives within Council operations, this opportunity may well be wasted. Overly conservative planning (using safety, internal politics and road corridor width and other excuses), and a failure to articulate the operational intervention logic to Councillors, will mean poorly-coordinated projects lurch through overly cautious processes. If they're passed by Councillors at all, they will likely produce mediocre results, with little meaningful effect on Wellingtonians' transport choices.

5. Integrating the hierarchy firmly into operational documents with clear intervention logic will fix both these issues, and give the Plan's goals a fighting chance of being achieved.

6. The action plans need:

- a. quantifiable goals / SMART objectives for implementing the hierarchy - i.e. for mode shift away from private / single-occupant vehicles, which can cascade down into delivery teams' KPIs. (At present the only thing which would translate thus for cycling is "cycling safety", and the pedestrian measures are "maintain current satisfaction". This kind of approach perpetuates and reinforces a conservative mindset in delivery teams.)
- b. Quantifiable SMART objectives should also be ones for the city Wellington wants to be, not the city that engineers will give us (or the city that engineers think the public will accept).
- c. a causal connection between the investments in infrastructure (pedestrian and cycle networks) and mode shift - i.e. investments "will increase mode shift" (and integrating the SMART objectives above and culture change investments below).
- d. the addition of specific "culture change" investments to complement the infrastructure investment for mode shift. (For example, Bikes in Schools and some unstated cycle training are currently the only non-infrastructure aspects of "increase uptake in cycling"). This should include: (1) an ongoing, intelligent promotional campaign for urban cycling (and walking, scootering, bussing), and (2) activities designed to make all road corridor users more courteous and more aware of each other - i.e. gradually make us better at sharing space with other modes.
  - i. This funding could be reallocated from road maintenance, bringing Wellington's spending into line with other cities. See also Liveable and Vibrant Centres \*\*\*\*

#### PARKING

7.1 support the Plan's moves to manage parking more sensibly across the city.

8. At present, private car parking is a staggeringly poor use of space in economic

Terms

9. Two things that would make a big difference are demand-responsive pricing (with smart meters) in the CBD, and removing the requirement for city houses to have street parking. This should be done intelligently but is at present a huge barrier to city and city-fringe residents living more sustainably – which research shows clearly they want to do (see CSC and WCC research on per capita registered car ownership etc).

HOUSING

10. I support the intensification of housing in Wellington, and the plan's moves towards this are very encouraging.
11. I would like to see more commitments – e.g. SMART objectives or goals – that might ensure the Plan's intentions are turned into operational commitments.
12. I support the points in the Centre for Sustainable Cities' submission on a housing WOF.
13. See also "Open space".
14. Greenfield subdivisions should be designed and developed to actively promote (rather than passively hope for) sustainable transport decisions by their residents.
15. This needs to include good park and ride facilities (including covered bike parking) at transport hubs, required provision for bike storage and parking in mixed-use and higher-density residential areas, and designing roads and footpaths to provide better for sustainable transport than for unsustainable transport. Overseas design guides should be pillaged for material and the District Plan provisions and design guides improved accordingly.

LIVEABLE AND VIBRANT CENTRES

16. I support the Plan's focus on the fact that more people want to live near where they like to spend their money. It's a huge relief to see this crucial fact finally being given appropriate attention.
17. Shared spaces for transit should be used much more than they have been to date to improve cycleability and walkability. This should be done with associated promotion and reminders about sharing conscientiously and courteously (as per 6.d).
  - a. This is important because insisting on segregated space for different transit modes robs Wellington of options on most of our streets, and encourages people to move around without being "present" to and accommodating others.
  - b. Citizens of other cities manage shared spaces much better than Wellingtonians, and this is due to cultural differences rather than

Wellingtonians' inability to pay attention or go courteously. Our transport and transit culture is the product of 60 years of car-centrism and a compact CBD that encourages walking despite the car-focussed design. It's time for our transit culture to grow up and for Wellingtonians to share our precious space like civilised adults.

#### OPEN SPACE

18. Brisbane has a good guide for how to do green and open space planning while intensifying land-use in cities. This should be used as the starting point
19. Two things that should be integrated into plans are:
  - a. active promotion of inner-city developments that incorporate open space that people can use as an alternative to the traditional private sector;
  - b. enhancement of small inner-city parks and people-focussed green spaces (e.g. the "sunny" side of Victoria St) so that they can serve the same purpose.

#### SPECIFIC POINTS

20. I also support all the specific recommendations in the Centre for Sustainable Cities' submission (pp6-8).

## Wellington Urban Growth Plan

### Submission from David Edmonds

The urban growth plan talks about preserving and enhancing the city's environment and character, and investing in infrastructure to increase its resilience to risks posed by natural hazards. The undergrounding of overhead lines is a way of achieving both these aims.

Compared with overseas cities, and many NZ towns and cities, the Wellington city landscape is detracted from by the many overhead lines that clutter city streets. Photos of the central city taken in the early 1900s show the main arteries in the central city festooned with overhead power and telephone lines. In general, the situation in the central city has improved since then but the decision to permit communication companies to attach lines to trolley bus support cables reversed the trend. With the signalled intention by the Greater Wellington Regional Council to phase out trolley buses, the opportunity exists to clear the city's main routes of overhead lines and cables by relocating them underground at the same time as removal of the trolley bus wires and support poles.

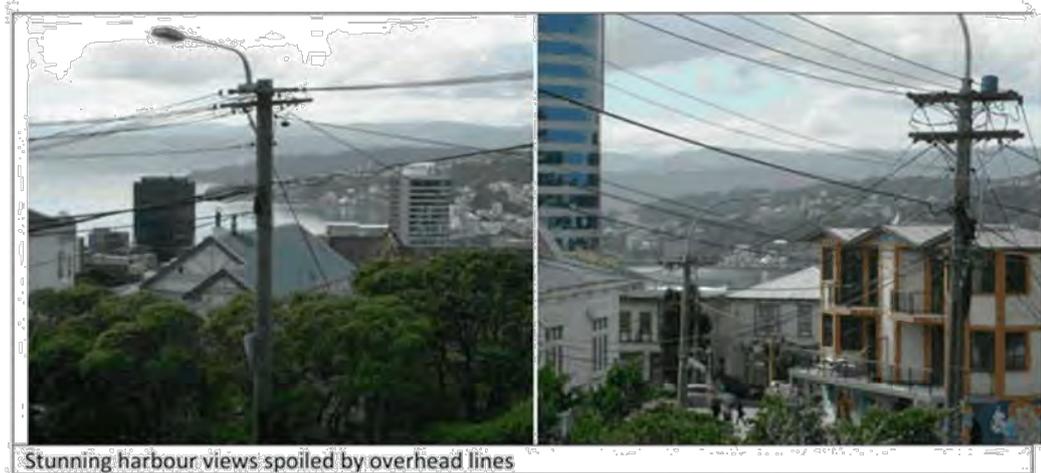
Even in areas close to the main central area, eg Molesworth St, where the majority of lines have been located underground, street lighting feeds are still overhead and this has been used as an excuse by communication companies to attach their lines to the lighting poles. This situation relates back to inaction by the former council owned MED, something the current electricity lines company has not improved upon.

Newer suburbs have benefited from council's decision to now require power and communication lines to be located underground. However there has been no discernable move to date by the Wellington City Council to encourage or require the undergrounding of existing lines to:

- enhance the landscape of existing older areas of the city, and
- make the infrastructure more resilient to natural hazard, particularly damage from high wind and falling branches.



An example where overhead lines significantly detract from the general appearance of the townscape is in the Tinakori Road shopping area. There are also many stunning vistas of the harbour that are marred by the visual intrusion of overhead lines.



Stunning harbour views spoiled by overhead lines



Tinakori Rd, Thorndon

Adelaide Road, Newtown

Cityscapes where the visual appreciation of the scene is adversely affected by overhead lines

Some years ago the Wellington City Council established a fund to assist residents to work with lines companies to achieve undergrounding locally. It is understood that despite a few instances where negotiations were started, no lines were actually undergrounded as a result of this initiative because of the high cost to individual residents. In my view, undergrounding will only work if the local authority is actively involved in making it happen and contributes to the cost of the improvement. Many NZ towns and cities work with power and communication companies to achieve incremental street improvement through undergrounding of lines. Wellington needs a similar policy, and a commitment and budget to make it a reality.

There have been many missed opportunities where undergrounding could have been carried out in conjunction with major refurbishment of an arterial road, eg the southern part of Adelaide Rd in the early 2000s. The council's response at the time was that there was no budget for undergrounding of the overhead lines to take place.

It is realised that coordination with the various electricity and communication companies will call for additional effort, and that decisions regarding the sharing of costs may require extensive negotiation, but the benefits are significant. Pursuing an active policy of investment in undergrounding of overhead lines would:

- preserve and enhance the city's character
- help regenerate existing urban areas
- increase the resilience of the infrastructure against natural hazards
- be seen as a catalyst for positive change

If other NZ towns and cities can actively work towards the incremental undergrounding of overhead lines, why not Wellington? A few years ago the City of Victoria in British Columbia, Canada was debating how it should best commemorate some historic milestone. It decided that this would be most appropriately achieved not by building a monument or park but by removing the overhead lines from a significant part of its city centre. I understand this decision went down well with the citizens of that city and was seen as making the city more attractive to live in.

Email forwarded in submission for the Urban Growth Plan on 13/10/2014 (to BUS Growth Plan)

Dear WCC,

I would like to make the below into a late submission on your Urban Growth Plan and would like to appear and be heard on this matter.

Thank you

Phil Hayward  
Lower Hutt

**From:** Phil Hayward [mailto:philhayward@vodafone.co.nz]  
**Sent:** Monday, 13 October 2014 7:28 a.m.  
**To:** letters@dompost.co.nz  
**Subject:** Quarter-acre dream lies outside city

Dear Editor,

Your article heading "Quarter-acre dream lies outside city" contains the germ of a big inconvenient truth for urban planners.

The ex-World Bank expert Alain Bertaud who gave several lectures in NZ a few weeks ago, points out in his studies that "growth boundaries" end up creating *MORE* long-distance commuting, not less.

While our planners are "preserving" massive swathes of farmland adjacent to Karori, Ngaio and Johnsonville, thousands of people like the couple featured in your article are being "priced out" to the Wairarapa and Horowhenua. In fact even infill development in locations like Stokes Valley and Titahi Bay, is a symptom of this absurd perverse consequence.

NZ's cities are possibly the most glaring illustrations of Bertaud's argument anywhere in the world. The furthest reaches of urban fringes, and exurban country towns, have growing concentrations of first home buyers who commute 50 to 160 kilometres daily. Meanwhile still-affordable cities (like the many in the USA that still have a historically normal median multiple of 3) have townhouses and depreciated old cottages right next to the CBD, for around \$100,000. Some of us might remember the much wider options of location back when Wellington was systemically affordable. Free market "sprawl" *works!*

Yours faithfully

Philip G. Hayward  
2 McEnroe Grove  
Naenae  
Lower Hutt 5011  
567-8761

Submission received as an email from Greg Lee Consulting on 17/10/2014  
To: BUS: Growth Plan

Hi Lucie,

I have briefly read the draft Growth Plan.

The following comments are supplied in order to be helpful and to assist you in making a robust plan. The issues that I have raised are based on a relatively quick read and I have not read any of the back ground documents or technical papers. I expect that many of the matters raised may well have been thought about already. Overall though I enjoyed reading the document and clearly you and your team have put a great deal of thought into a complex and very wide ranging topic area.

Overall, in my view, the document is very well presented and reads well. It is structured well and coherent. It usefully outlines and overall theme and approach, drawing together and appropriately developing existing strategy and policy. This means that you don't need to read all of those other documents but can just use this one, which is great.

I have some detailed observations to make and have provided an outline of these below, for your consideration.

At the outset it is worth making a high level observation that my overall feeling on reading the document is that it describes utopia and does not address the inherent tensions that will inevitably emerge. That may well be a decision that you have made with this document to spell out what is wanted overall and leaving the detailed activity that follows to make those decisions. Nevertheless some aspects are worth thinking about now, in my view, notably:

1. The role of the city centre is identified as being to accommodate significant amounts of new housing and also commercial and employment development (elsewhere the plan states that the amount of open space in the centre will be increased, which creates additional tension on land). Can the Centre really fulfil all of these functions given the availability of land and the pressures proposed to be placed on land [please also note my comments on capacity of infrastructure below (see point 3 below)]? In this context of land demand, is it worth thinking about the statement on page 37 that office development at the port could adversely affect the vitality of the city centre? In essence have you got statistics on employment land need by SIC or otherwise? It could be argued for example that office development at the port is walking distance from the rail station and planned PT Spine and therefore is a good location.

Equally, it is worth bearing in mind that the RONS and Petone to Grenada will increase the accessibility of low density employment land at Porirua and Gracefield, which enables those types of industry to move out (if wanted) providing space for high density high value employment in the city.

Please note that I am not saying that the statements or approach in the Plan are incorrect but raise the above issues as a basis for checking and verifying the approach taken.

2. The plan aims to deliver improvements to public transport, cycling and walking and confirms that pedestrians will be prioritised. So for example page 47 states that improvements will have the greatest benefit to pedestrians. And page 48 explains that delivery of the rapid transit system will include streetscape improvements that prioritise the needs of pedestrians. 2 issues stem from this, I think. Will delivery of public transport be hindered by the need for that project to also deliver other things, hence making it too difficult? Can you deliver improvements to public transport wanted if pedestrians always have greatest benefit and thus inferred priority? This is important because the challenge for PT is a viable business case, which is about journey time, reliability and cost, and the plan as proposed might stymie implementation of PT, because of a stipulated need to provide other things with it?

3. The approach of the plan could be crudely summarised as to direct housing growth to centres so that the new population can use existing facilities. This is efficient and avoids the need to build new utilities, schools, open space, health and medical facilities, and also supports existing public transport networks. Great. Support that. However, the critical question is do existing facilities have the capacity to handle increases in demand placed on them? Studies that I have done in the UK have grappled with this issue and inevitably show new infrastructure is needed somewhere. Schools require big chunks of land, and providing for new ones (or extending existing) within existing urban areas is problematic. In my experience you need to also think about areas that do not have a good range of services as well, and consider using new housing development to pass thresholds that trigger provision of new facilities so as to then ease pressure on existing centres. This is a more holistic approach.

4. Finally, the plan states that intensification will protect and not affect the character of areas. Instinctively I understand that this can be done to varying degrees, but it is not clear if studies have been done to demonstrate how this will be achieved. You would need to examine infill opportunities and show how the urban fabric can absorb new development. But if you do want to achieve the big numbers of growth shown on the plan on page 54 then I think that you will need to accept that areas will change, and that plans will be needed to ensure that this is achieved appropriately.

I have some detailed observations to make which hopefully are of use, below:

a. It is not clear if the data on pages 15 to 18 are current trends or what is wanted to be achieved through the plan. The 2 things are mixed I think. I think that needs careful edit to make clear what the trends are. I think that words outlining what is wanted should be left to the last section and that text should be clearly linked to the action plan part of the document. You also need to be careful in that projections are not real, and at best they show past pressure and potential future pressure that can be accommodated or might be able to be redirected to other locations. Note the map on page 18 does not appear to reflect the map on page 54 and 6.

b. In the document you refer to high, medium and low density housing. Is it possible to stipulate what that is in terms of dwellings per hectare, or otherwise bring the definition on page 56 to front?

c. There is no data on employment projections by SIC and employment land available? I think that this critically needs consideration as part of planning for the growth of the city. Housing and employment must be planned for in tandem, and integrated into transport planning.

d. The data on transport on page 25 is potentially misleading as reflects economic recession and global financial restructure. Long term trends are more reliable, and future trend estimates are available in TN24. Note figures on page 25 are very different than those quoted in text on page 24, as derived from different sources. Which one is relevant, robust?

e. I think that it would be useful to identify priority for each of the actions in the action plan, as there is a lot of them, where each action will entail considerable work and lots of decisions.

f. It is not clear to me how the regeneration areas have been identified on pages 33 - 35. Are they derived from some technical work and do they display particular characteristics? Or are they areas that have opportunity to accommodate change, and are likely to benefit from transport investment (or other investment), and so you have tied those 2 things together?

g. Page 41 identifies suburban main streets for investment. These appear to be different than the centres identified in the plan. Seems to me that investment in these locations may well affect the viability of existing centres, and somewhat counter to the aim of intensification at existing centres. Or am I missing something? Also is it better to direct investment to a select few?

h. Page 41 refers to use of BIDs. Good tool, but probably useful to refer to it as one of several tools available. Town centre managers, or simple project based collectives can work too.

i. Page 43 does not show the RoNS correctly missing out section from TG to Terrace and Vivian Street.

j. Other action to support cycling would be more cycle parking everywhere, and requiring new office development to provide showers and cycle parking. Page 44. Note. I thought that the great harbour way was also to be an important commuter route?

k. Page 50, first project should reference the Ngauranga to Airport Corridor Plan which identifies the ring road, which is intended to reduce numbers of cars in central city.

l. Page 51 refers to need for a parking strategy. The actions to review parking strategy should look at supply and demand for long and short term parking by location and consider public

transport costs, and park and ride. I did a study in the UK and found limited relationship between car parking, centre size and vitality and viability, but one with PT. Obvious I know, but parking policy and approach to it is very important.

m. Have you done a brownfield or infill potential study so as to estimate the housing numbers shown on page 54?

n. It occurs to me that a dimension of housing affordability is a range of house size and type and the difficulty then is how do you get to influence / direct developers to provide this. Developers naturally want to build stuff with the least cost and highest value and that exacerbates the housing cost problem. A solution would be to require bigger subdivisions to be consented on the basis of a design of house for each lot, so that WCC can then get involved in house size and type. The next step is to do a housing need study, which is to relate population to house size, and to available supply, so as to work out what is needed (rather than wanted). This study can be done, and be linked with the housing accord etc.,

o. Should plan refer to the national war memorial park somewhere? Seems like it is relevant to Te Aro at least.

Naturally I would be very happy to meet and to discuss the matters that I have raised, and to go through my marked up version of the document. I can also embellish on some of the ideas and solutions that I have suggested.

Kind regards,

Greg Lee  
021 2404388

Sent from my iPad

## Wellington Urban Growth Plan

1.

**First Name:**

Sophie

**Last Name:**

Mormede

**Street Address:**

37 Ranelagh Street

**Suburb:**

Karori

**City:**

Wellington

**Phone:**

02102675254

**Email:**

sophie.mormede@gmail.com

**I am giving this submission:**

as an individual

Your comments on the draft plan:

Thank you for the opportunity to comment on the draft urban growth plan. I felt there was generally not enough information in the plan to be able to make substantive comments on most items, and that the statements were vague enough to be able to encompass all sorts of actions (or inaction). For example, what kind of development is planned for the Karori centre, where I live.

I have some general comments, which I have tried to organise by category.

Transport:

\* public transport must be affordable for people to use it. As it stands driving a car on your own is both faster and cheaper than taking the bus or the train for most people (me included). Christchurch transport is way cheaper, and in most places around the world. For example in San Francisco a \$7 ticket will let you ride all buses for up to 90 minutes. My daily commute would cost me \$4 there, and currently stands at \$20 cash fare in Wellington, hence I commute by car. On foot would take 1h15 (same as by bus) and by bike as both too far for my fitness and too dangerous as it stands.

\* Public transport to the airport is even less affordable.

\* The airport ground is neither bike nor pedestrian friendly.

\* Pedestrians would benefit from highly publicised website where they can plan their journey, particularly around the maze of paths in Wellington. I believe a website exists, but where?

Developments:

\* The airport development is currently not financially viable, as a result imposed by the airport not willing to finance the development themselves but making the tax payer cover increasing portions of the costs. This government advocates selling assets and self-governance with no interference, and this should apply there too. Let the commercial benefits drive the project, or to stop.

Environment:

\* Removing barriers to housing development should not be at the cost of the environment or of the local amenities, both will get increased use. This plan does not show either way.

\* Development of Kibinzie should be mirrored with improved environment plans, as more people will want to access the outdoors more. Suggestions could include a maara in Moa Point, further protection / development of Lyall Bay and Te Rauparua point.

\* how does the development of the great harbour way tie in with the current application for a commercial-scale shellfish facility in Mahanga Bay, restricting both pedestrian access to the foreshore and kayak access to the shoreline.

Review:

\* suggest the addition of the number of Waka Sensitive Urban Design developments vs the number of developments using traditional designs, both by WCC and by private developers. It's not enough to have best practice guides, they need to be used.

I hope some of these comments will be taken into consideration prior to implementation.

Regards,

Sophie Moynock

## Wellington Urban Growth Plan

1.

**First Name:**

Carolyn

**Last Name:**

Nimmo

**Street Address:**

26 Thornycroft Ave

**Suburb:**

Epsom

**City:**

Lower Hutt

**Phone:**

6442800527

**Email:**

nimmoc5@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I own a property in Mitchell St, Brooklyn and work in the CBD. I am providing this feedback as a ratepayer.

I do wish to present my views verbally to Council if there is an opportunity.

I am in favour of intensified housing and redevelopment of existing areas ahead of greenfield development. However, it must be undertaken holistically, attending to the life that will take place within the city, the spaces in which that will take place, then the buildings that facilitate it. I believe the development of Te Aro has been too intensive, favouring buildings over street life and making the streets shaded and unattractive wind tunnels. I would like future development in places like Kibirnie and Johnsonville more modest in scale and friendly to those using the areas.

I therefore agree with making Victoria St and others, as listed, into boulevards. Diversity of housing options and creativity in their development are important, including ample supply of housing for the elderly and people of low income within every part of the city.

I also support all possible means to make the streets pedestrian-friendly in the first instance followed by cycling and public transport, and restricting car use. I do not support the Petone-Grenada link road.

These measures will improve our natural environment, which is extremely important, by preserving open spaces around the city and making spaces within the city attractive to humans, birds and plant life.

I am happy to provide more detail in my verbal submission or at any other opportunity. Thank you,  
Carolyn Nimmo

**Submission to the WCC  
on the  
proposed Central City Safer Speed Limit**

**1 Your name and contact details:**

Name: Tony Randle  
Street Address: 20 Truscott Avenue  
Suburb: Johnsonville  
City: Wellington  
Phone: (27) 484 6266  
Email: wellingtoncommuter@gmail.com  
Date: 14 October 2014

I am making a submission as an individual.

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**2 Introduction**

I wish to make a Submission to the draft Wellington Urban Growth Plan. My submission focuses on the draft Urban Growth (UG) plan:

- approach is for "A Compact City" and increased residential density.
- "Transport and Movement" proposals (i.e. transport planning).

As a long-time advocate for my community of Johnsonville and for improvements to the wider city (especially wrt to Public Transport), I have a number of concerns about the draft UG Plan.

<http://wellington.govt.nz/have-your-say/public-inputs/feedback/open/wellington-urban-growth-plan>

### 2.1 Improved Housing Affordability is more important than densification

Over recent years, Wellington residential housing has increased in price at a rate much faster than either inflation or incomes. **Housing affordability** is now a major issue for the city as outlined in numerous articles<sup>2</sup> and studies<sup>3</sup> with the annual '10th 2014 Demographia International Housing Affordability Survey' stating:

*Overall, housing in New Zealand was severely unaffordable, with a Median Multiple of 5.5. Six of New Zealand's markets were severely unaffordable, while two markets were seriously unaffordable. Outside of Auckland, Tauranga-Western Bay of Plenty was the most unaffordable, with a Median Multiple of 6.6. The second and third largest markets were severely unaffordable, with Christchurch at 5.8, and Wellington at 5.4. ...<sup>4</sup>*

The New Zealand Minister of Finance places the blame of rising house prices squarely on councils restricting residential land supply (including presumably the WCC) recently stating:

*The growth in housing costs over time, to the point where you're seeing families spending 50-60% of their income on housing - that's pretty devastating at the low end ... Councils needs to understand that when they run these policies that restrict the availability of land and the opportunity for lower value housing, they are causing poverty.*

Yet the WCC UG Plan barely even acknowledges the major problem that Wellington housing costs are a high and increasing portion of residents incomes (either in the form of rent or mortgage payments). There is no discussion of the impact of the UG plans on Wellington housing affordability. There is also no information on the key issue of how much additional land the WCC plans to permit to be available for urban residential development to ensure house prices do not increase further.

### 2.2 Improving Transport

The UG Plan's proposals for transport also appear divorced from reality:

- There is an excessive emphasis on cycling, a mode with only a 2% - 6% mode share<sup>5</sup>. Bus based PT services are much more important with usage between three and six times that of cycling with much greater potential to be a viable alternative to cars. Improved bus PT therefore deserves an appropriately higher priority than cycling but the UG Plan does not have clear information or objectives for required improvements to Wellington PT Services.
- There is also an assumption that the Greater Wellington Regional Council (GWRC) who are responsible for providing Wellington City public transport, will support the investment required to improve the UG Plans PT services. In fact the GWRC and WCC have a very poor record of cooperating on this issue as outlined in the WCC Submission on the GWRC PT Plan earlier in the year.
- Car based travel will continue to be the dominant mode of travel and so should also have appropriate support in terms of road and parking improvements.

<sup>2</sup> ["NZ house prices among world's highest"](#) Stuff Website 2 September 2014

<sup>3</sup> ["Priced Out - How New Zealand Lost Its Housing Affordability"](#) by M Bassett and L Malpass, The NZ Initiative (May 2013)

<sup>4</sup> ["10th Annual Demographia International Housing Affordability Survey"](#) Page 18

<sup>5</sup> ["English says council land restrictions worsen poverty"](#) - Interest.co.nz

<sup>6</sup> ["Census 2013 Journey to Work Analysis"](#) - GWRC

### 3 Recommended change to WCC UG Plan

The following changes are recommended for the UG Plan:

- Clear statement that ensuring Housing Affordability to be a goal of the UG Plan with annual measuring of progress towards this goal.
- Clear statement that the UG will ensure additional land will be released for urban development to ensure affordable houses are provided in Wellington City.
- Clear statement that the WCC planning processes will be improved to reduce planning and permitting costs for housing.
- Remove consideration of further Medium Density Residential Areas until:
  - the current MDRAs of Johnsonville and Kilbirnie have proven to be economic in providing additional high quality and affordable housing.
  - the WCC and GWRC have established a clear and fundable plan to improve PT services to these areas.
- Work with the GWRC to confirm a clear and funded Bus Service Improvement Plan including implementation of the Bus Rapid Transit along the Growth Spine from Johnsonville via the CBD to Kilbirnie.
- Work to improve Wellington City PT is also dependent on GWRC support in many other areas. The UG Plan should more clearly advocate for:
  - Fairer PT fares for Wellington City. Fares should be lower for travelling shorter distances, not provide extra subsidies to living far from employment centres. The WCC should also request the GWRC stop providing special lower fares to rail commuters unless they are also made available to bus commuters.
  - A share of PT capital investment to support bus services get around congestion points. This starts with the Spine BRT Project but should also apply to many other areas.
  - Ensure that Integrated Ticketing is implemented. Different parts of Wellington City are served by three different PT service providers and commuters must buy separate tickets for each.
- Make proposed changes to increase residential densities conditional on obtaining approval from the GWRC for supporting improved PT services.
- Remove the plan's proposed further restriction on long-term car parking until the WCC and the GWRC can provide a clear and affordable alternative form of travel to areas of employment including the CBD.

#### 4 Key Quotes and Comments on "A Compact City"

This section highlights key quotes from the draft UG plan and an associated comment issues with the UG Plan statements on "A Compact City".

##### 4.1

"The city's population is expected to increase to around 250,000, with growth directed to maximise benefits to the city. ... The city's projected population growth will result in the need for an additional 21,400 residential dwellings by 2043 (approximately 715 new homes per year). ... This trend is expected to continue and we expect 25 percent of new housing to be low-density, 35 percent medium-density, and 40 percent high-density.

The aim of this plan is to see most of the growth over the next 30 years occurring in the central city and along the growth spine. Greenfield development areas (mainly in the northern suburbs beyond Johnsonville) will provide for the expected demand for new single detached homes.

\* This plan's targets for new housing density types (low: 25 percent, medium: 35 percent, high: 40 percent) are met."

COMMENT: The WCC UG Plan states the WCC will require 75% of future housing to be medium or high density. This sort of housing is generally rebuilt into current residential areas (Central City, Adelaide Road, Johnsonville & Kilbernie are specially targeted). There are two problems with the proposed approach in the UG Plan:

- \* Such rebuilding requires the destruction of current low density housing to provide the land for higher density housing. Unlike greenfields development, each set of 6 – 8 medium density units usually will require the demolition of two larger detached houses. In Wellington purchasing properties with established houses significantly adds to the cost of accessing the land.

This, in turn significantly increases the cost of the rebuilt housing. I was present at the Environment Court Challenge to the Johnsonville MDRA when evidence was presented that the cost of established housing was too high to make rebuilding the land into medium density housing economically viable. It is notable that since the imposition of the Johnsonville Medium Density Residential Areas (MDRA), not a single medium density housing development has proceeded. The feasibility of large scale densification of established housing in Wellington is a major assumption of the draft UG plan yet the WCC cannot provide any evidential basis for this succeeding.

- \* The plan also relies on an absence of cheap greenfields residential development implying the WCC plans to resist the government moves for it to release more greenfields residential housing to stop the ongoing spiralling increase in house prices.

Also, the UG plan makes no statement on the impact of its proposed approach on housing affordability. It does not even provide basic facts on Wellington housing affordability both current and future. It is as if the problem does not exist (indeed it may well be that the WCC urban planners do not think the problem exists).

Draft Wellington Urban Growth Plan 2014-2043 - Wellington City Council Pages 11-12

Date: 14/10/14

T: Rando, Submission to WCC on Urban Growth Plan 2014-43 141013.docx

Page 4 of 8

4.2

#### **Housing supply and choice**

We need to ensure there is enough supply for the growth we expect (approximately 21,400 additional dwellings by 2043), that it is of a good quality and is in the right locations that are identified for growth. We also need to make sure that the type of housing we encourage is what we will need in the future, taking into account changing demographics such as an aging population and smaller households. Medium-density housing presents an opportunity for providing some of the additional homes we need.<sup>8</sup>

COMMENT: The WCC plans to have Medium Density Housing become the primary dwelling type for Wellingtonians to live. But what do Wellingtonians want? There is no information in the UG Plan on the types of housing to which residents and future potential residents are aiming. Anecdotal evidence is a higher portion of residents would like to live in detached houses but such affordable houses are unavailable due to current planning restrictions.

The government and many commentators claim the amount of medium and high density housing being built is not due to market demand but because of current council planning restrictions. The UG Plan should acknowledge and discuss how future residential market demand will influence the plan.

4.3

#### **Focus on medium-density housing opportunities.**

Medium-density housing ranges from stand-alone dwellings that are built on smaller lots through to terraced housing and apartments that are usually three storeys or less. It is a way of increasing density but still providing many of the elements that people like about housing in suburban areas.

**Project:** Increase medium-density housing development – encourage high-quality, residential intensification in suitable locations and particularly in our existing Medium-Density Residential Areas (Johnsonville and Kilbirnie).

**Action:** Take an active development role – partner with external parties to deliver medium-density housing development in existing growth areas to assist or act as a catalyst.

**Action:** Remove barriers – assist external partners to deliver housing that aligns with our vision. Facilitating amalgamation of lots and the like to remove barriers for good quality development.

**Action:** Demonstration project – explore partnerships with housing providers and others to build housing demonstration projects on strategic sites.<sup>9</sup>

COMMENT: In its strong objection to the imposition of an MDRA on Johnsonville, the Johnsonville Community Association claimed the MDRA was an unproven "Smart Growth" experiment to create medium and high density housing in a suburban centre. Although District Plan Change 72 stated it expected 1,000 new residents to be built in the Johnsonville MDRA, to date not a single medium density development has started.

The WCC response to the ongoing failure of the MDRA in Johnsonville to attract private developers to build any medium density residential developments is to pursue further activities to force of this new dwelling type into the suburb. This now includes actively funding (i.e. spending ratepayer money) such on such developments.<sup>10</sup>

<sup>8</sup> Et al Page 48

<sup>9</sup> Et al Page 49

<sup>10</sup> I understand the demonstration project is likely to take place in Johnsonville.

Affected local residents obviously cannot rely on WCC support in objecting to developments that may be inappropriate or low quality – the WCC urban planners seems desperate to “prove” medium density housing is wanted by Wellingtonians even when there is clear evidence to the contrary.

**4.4**

**Project:** Plan for future medium-density areas around key centres in locations that are well-served by public transport, infrastructure, community facilities and open spaces. The identification of potential medium-density areas will also consider heritage values and existing neighbourhood character.

**Action:** Undertake investigations for suitable areas including Tawa, Karori, Miramar, Newlands, Crofton Downs, Berhampore, Island Bay and Khandallah. Investigate future opportunities including public transport corridors, such as future bus rapid transit corridor extension, and other suburban centres.<sup>11</sup>

**COMMENT:** When MDRAs (they used to be called “Areas of Change”) were first proposed, the WCC outlined them for a range of suburbs. Strong objections reduce them to just Johnsonville and Kibbernie. The WCC is again going to force MDRAs into additional suburbs even though these areas have strongly opposed such plans in the past. The residents of the above suburbs are again likely to have to oppose WCC plans to force them into medium density housing areas.

**4.5**

**Encourage a mix of housing types and more affordable options.**

This action area recognises that the city’s housing goals will not be achieved through the delivery of medium-density housing alone.

**Project:** Update our planning framework to reflect our vision for housing – this will ensure that we have a more than adequate supply of housing across a range of types and locations.

**Action:** Consider changes to the District Plan – this includes reviewing provisions that control infill housing and residential intensification to increase the opportunities for quality compact housing forms in existing suburban areas and areas adjacent to the central city.

**Action:** Promote more efficient land use in greenfield areas – this includes exploring opportunities for denser development and subdivision in identified greenfield areas, and completing a stocktake of other greenfield expansion opportunities. This plan’s principle of encouraging densification close to employment, services and quality public transport will also apply in greenfield areas.<sup>12</sup>

**COMMENT:** The WCC plan for dense residential development will also be applied to greenfields areas. This implies that low density development will be discouraged.

The promise to further change the District Plan to support more intense development is especially concerning as the current plan is already quite supportive of this type of development. Again this also implies (it is never stated) that the WCC will limit amount of greenfields land to be released for residential development.

<sup>11</sup> Et al Page 49.  
<sup>12</sup> Et al Pages 50 & 51.

## 5 Key Quotes and Comments on Transport and Movement

This section highlights key quotes from the draft UG plan and an associated comment issues with the UG Plan statements on Transport and Movement.

### 5.1

#### Encourage more public transport use

The public transport network includes rail, buses, trolley buses, taxis and ferries, mostly operated by regional and national government. Wellington City Council, as the manager of land use and the street network, has a key role in integrating public transport with residential and commercial activities, and ensuring the main streets and routes people use to get to and from public transport are attractive. Public transport is a considerably more efficient mode for moving people than the private car. It has a much smaller environmental cost, reduces congestion by lowering the number of cars on the road and minimises the need to provide car parking.

**Project:** Advocate for improved provision, reliability and affordability of public transport to encourage more people to use it – a high-quality public transport system is critical to Wellington's future success and attractiveness as a place to live, work and do business.

**Action: Help deliver a rapid transit spine through the city** – work in partnership with GWRC and the NZTA to implement the preferred public transport spine corridors and services. The agreed spine routes will run from Johnsonville to Island Bay and Karori, and to Miramar and Seatoun through the city using the Golden Mile. This will integrate the public transport spine with the rest of the public transport network and other transport options, servicing the central city, our key centres and our suburban areas. Where the rapid transit network is to be developed, identify appropriate streetscape improvements that integrate all transport modes and prioritise the needs of pedestrians. Identify sites with potential on this main transport route to better integrate bus stops with other street activity, and achieve development outcomes. Integrate the delivery of public transport priority with cycleways sharing the same corridor in some locations.

**Action: Work with GWRC to improve the quality of the public transport experience** – this will include working together to help deliver the new route network set out in the Regional Passenger Transport Plan and looking at bus shelters and other amenities to improve passenger comfort.<sup>13</sup>

**COMMENT:** There are several problems with UG Plans claims to improve PT services including:

- Even though the city has the highest PT usage of any in New Zealand, current PT services do not provide adequate access to a majority of Wellingtonians who continue to drive. PT Mode share has not increased in the last decade despite hundreds of millions spent in improved (mainly rail) services. Current GWRC led PT investment and planning is not delivering the increase PT usage promised from past investment but current GWRC plans are for further rail investments.

<sup>13</sup> Et al Pages 43-44.

- Wellington City has the highest PT fares in New Zealand and PT fares for 1 – 3 zones are more expensive than driving a car<sup>14</sup>. This obviously must change by making PT usage cheaper (not by making driving more expensive).
- The GWRC does not plan any increase in Wellington bus service funding<sup>15</sup> and so bus based PT service capacity must be assumed to remain the same or reduce in quality. Increase PT usage required under the UG Plan obviously requires increased funding support that is not included in GWRC budget forecasts.
- In practice the WCC transport planning does not consider improved PT Services. For example, the WCC Johnsonville Roading Improvement Project was justified with car traffic improvement benefits only. This means that the proposed changes are likely to reduce the bus-based PT access through the Johnsonville Triangle. The WCC track record on including public transport into their transport planning process is (at the minimum) inconsistent.
- Increase population and CBD employment will require more people to commute yet, as outlined above, the only option for most will be to drive but where will they park?

## 5.2

### **“Manage parking more efficiently”**

People use their vehicles in the city for different purposes and we need to ensure that we cater for these different needs. This will involve a review of the supply and demand for parking...

#### **Project: Examine levers for private parking**

**Action:** Discourage the provision of commuter parking particularly in the central city – short-stay parking has greater economic benefit than long-stay as it supports retail and business activity. We will encourage the conversion of long-term parking into affordable short-stay parking or other uses.

**Action:** Investigate solutions for locations where people are parking to support their use of public transport – this is particularly important in suburban locations where the distance between people's homes and public transport are further. Locations such as Johnsonville train station are important ‘park and ride’ provisions.

#### **COMMENT:**

WRT to “Discourage the provision of commuter parking”, this is the clearest statement of the WCC plans to further restrict car access to the CBD to try and drive everyone towards using PT. But, as outlined above, the UG Plan is heavily dependent on improved bus based PT service yet improving this service is not the focus of current GWRC plans. The WCC cannot reduce commuter parking without ensuring there is a viable alternative service to commuters.

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<sup>14</sup> The Wellington City Bus Review was undertaken on a “zero-budget” basis – services can only be added if savings can be found from cutting other Wellington city bus services. Et al Page 47.

WRT parking near PT hubs would note that:

- The GWRC funds Park and Ride parking at railway stations but not bus hubs
- The GWRC has explicitly excluded any expansion of Johnsonville Park & Ride due to high land costs
- The WCC led Johnsonville Roading Improvement project will actually reduce the amount of park and ride parking near the Johnsonville Hub . . . a clear example of the WCC failing to support the type of PT service access proposed in the UG Plan.
- Without adequate park and ride commuter parking, the residential streets near PT hubs face ongoing and increased crowding from commuters trying to access the CBD via PT. This already occurs in many areas including Johnsonville, Newlands, Newtown, Kilbernie yet the UG Plan only makes a token commitment to "investigate solutions" on this important and expensive issue.

## 6 Conclusion

Overall, I am very, very concerned about the housing affordability for Wellington. While the draft Urban Growth Plan has the right words about the need to make our city more liveable, there is little in it to make it affordable for future residents . . . especially the young families that are literally the lifeblood of any city's future. IMO, this plan needs less focus on compactness and much more on affordability (a key urban growth criterion).

I am also concerned at the proven inability of the WCC and the GWRC to work together on improving Wellington City's PT services. The GWRC continues to prioritise its investment on increasing rail services access from other parts of the region while more cost-effective bus based improvements assumed by the UG Plan are neglected.

Indeed, while the WCC is focused on increasing residential density to support "a Compact City", the GWRC is focussed on providing cheaper PT access from areas up to 100km away to enable urban sprawl to reach the Wairarapa. There is a profound disconnect in the visions of the WCC and GWRC so it is unlikely the WCC UG plans related to PT services can ever work.

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by
  - Post**  
Freepost  
Wellington Urban Growth Plan (COP002)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140
- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr    Mrs    Ms    Miss    Dr

First name\* Pauline & Athol      Last name\* Swann

Street address\* 47 Maiaangi Road Wadestown Wellington 6012

Phone/mobile (04) 4728417      Email athol.swann@paradise.net.nz

### Your feedback

I am making feedback  as an individual  on behalf of an organisation

Name of organisation: \_\_\_\_\_

**Feedback is required by 5pm on Monday 13 October 2014.**

**Privacy statement**  
All feedback (including name and contact details) is published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

CSW/C09/951

Please provide your feedback here. Add extra pages if you need to.

see attachment

1st fold here - fasten here once folded

Thank you for your comments.  
**Please return this feedback form by 13 October 2014.**

2nd fold here

Free Post Authority Number 2199

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

**Free**  

**FREEPOST**  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

47 Mairangi Road

Wadestown

Wellington 6012

8/10/14

Wellington City Council (CAB2)

P.O. Box 2199

Wellington 6140

WELLINGTON URBAN GROWTH PLAN (COP002)

We are making feedback as individuals:

Page 4 - Our first point is the projected population growth in the next 30 years of 50,000! Have you taken into account the actual loss by natural causes of several generations, as we do not expect to still be here in 30 years and also unlikely our family will still be occupying their homes so question the need for an excessive development of new housing areas. We see on Page 14 reference is made to 13.5 of residents will be over 65 but we would like to see the other age groups numbers. However, we are pleased the plan ensures the quality of our natural environment is maintained and enhanced, places of historical value are preserved (and in this regard we trust the Town Hall will be restored as it is not only a Category 1 Heritage building but its acoustic quality makes it one of the world's top venues for performing and recording music) and the city is prepared for the risks posed by natural hazards and climate change.

Page 8 - Coastal Environment. Our communities value the coast and harbour and want to have both access to it and ensure it is well managed. People value the coast for the recreational, food gathering and amenity opportunities offered. There is concern about poor water quality from storm water in urban and rural areas and people want to be able to use their waterways for swimming.

Page 10 - A compact city. Along with the Town Belt, the Waterfront, Otari-Wilton's Bush, the Outer Green Belt, Trelissick Park and all the walking tracks, Wellington we agree has developed into a compact city and we support future developments to locations with quality transport links, infrastructure and community facilities.

Page 11 - A liveable city - A city set in nature. As a regular concert and theatre goer we agree and want to see Wellington remain a very accessible city between the harbour and hills and as above we want to be assured that our natural setting is protected and enhanced.

Page 17 - 18 There has been a continuous growth of high rise apartments in the inner city and more planned in Taranaki, Victoria and Cable Streets so again we question the so called demand.

Page 19 – There is so much repetitive plan ideas and this page on Natural environment and sustainability we refer back to Page 4! Ditto with Page 22 on City Resilience as so many buildings are already being strengthened. However, we are pleased to read of the need to observe Climate change impacts particularly low lying coastal urban areas.

Page 28 – Historic Heritage and character.... Again a repeat but support the importance of protecting and enhancing elements that help give Wellington its sense of place – the compact, walkable nature of the city, suburban villages, heritage buildings and objects, character areas and Maori Heritage.

34 – Deliver the Convention Centre. We have little opposition to the new Convention Centre being promoted by a developer but as ratepayers we cannot see the justification for the council (ie ratepayers) for the next 20 years to commit \$92m to lease the 2500 seat convention centre. Has any study been done to see how many conferences of this size would occur each year.

Page 37 – Airport Precinct – Although there have been reports commissioned on the benefits of first the extension of the runway into Evans Bay, which appears to have been side-lined, there is now the suggestion of the runway extension into Cook Strait at the cost to rate payers of millions of dollars but there has been no reports of overseas airlines patronage despite the Airport Company and the Chamber of Commerce saying “build it and they will come”.

However, it was reported on the 15<sup>th</sup> March 2014 by Wellington Tourism that more than 142,000 Australians flew into Wellington last year – a record level and up almost 7% on the previous year. The Australians were a key part of the total of more than 189,000 international arrivals that was up by 5.6% on the previous record year of 2011 – Rugby World cup year! All this without a runway extension!

Currently Paraparaumu Airport is running flights to Auckland 3 days a week and we understand will be providing similar services to Christchurch which provides an excellent service for residents in the Northern suburbs as well as Kapiti.

Plan for future growth - where it says work with the airport and key partners on measures to improve the city's international air connections (as above we have not seen any reports from overseas airlines) contribute to the master-planning revision; and identify opportunities for the council to assist development (will ratepayers be consulted we would like to know)

Page 37 – Port Precinct - We have read several business reports that said New Zealand is one of the world's fastest growing passenger source markets with the number of cruisers rising by 23 per cent in 2013. And between October this year and April 2015 there will be 564 calls to NZ ports and Wellington is very high on this list. We consider that the berthage used for smaller liners at Queens Wharf Outer T should be promoted bearing in mind the competition held a number of years ago for this site supported this idea as tourists arriving were able to walk to Te Papa, the Cable Car, shops.

Page 39 – Complete the development of the waterfront – We have previously made a submission against an 5-6 office block on Site 10, Kumutoto, and with the increase (as above) in cruise ship

passengers who walk along Aotea Quay, what a disappointment to arrive at Kumutoto to be greeted by a 5-storey office block which will create shadows and the loss of views across the harbour to Te Papa, Mt Victoria, the Monastery, ferry and fishing vessels. We can only imagine how they would prefer a recreation area with a variety of green spaces, sheltered seats, artisans workshops and access to hiring of cycles, scooters, crocodile bikes etc to continue on to Oriental Bay. The council wants to increase tourism and this plan would also cater for not only Wellingtonians but visitors arriving by train, bus or car and tourists at the Youth Hostel in the old Waterloo Hotel.

We also agree that Frank Kitts Park should be a premier-recreation area for the city, especially for children but it is also great to see adult keep fit classes operating in a number of lunch hours on the park.

Page 59 – Continue implementing the “greening Central Wellington vision” Explore policy and planning amendments. We support the Council’s planning framework which will ensure the protection and enhancement of the city’s natural landscapes and open spaces, indigenous biodiversity and ecological areas.

Watts Peninsula Reserve – again we support work with the crown and other parties to develop the Watts Peninsula heritage reserve.

Page 61 – City Resilience – There are far too many priorities cited to comment on but consider continued planning for the improved resilience of our coastal areas against the risk of increased storm events and sea-level rise and to complete the upgrade of Council-owned public buildings that are critical facilities in the event of an earthquake and the council by leading by example encourage the earthquake strengthening of buildings, structures in the city.

There is so much we could add but Wellington already is a very liveable city and as above we question the projected growth population in the next 30 years....where are the true statistics.

Pauline and Athol Swann



Submission received from Sue Teng, individual submitter on 06/10/2014

Email received with submission:

"Thank you for the opportunity to provide feedback. I am providing feedback as an individual.

My name is Sue Teng and my address is 193 Townsend Road, Miramar, Wellington

Enclosed is a copy of my completed feedback. I can be contacted on 0220117462

Regards

Sue"

#### Feedback on Wellington Growth Plan

I am a private individual who have recently completed building my house in 2012.

In the draft copy Wellington Urban Growth Plan, I support the delivery of medium-density housing to ensure adequate housing for the increase in the population of Wellington (approx. 21,400 additional dwellings by 2043).

New Zealand is experiencing a significant change in the structure of its population.

According to Statistics NZ, the largest growth will be the baby boomers (those born from 1946 to 1965). By 2036, we expect that between 21 and 24 percent of New Zealanders will be aged 65+.

*"The conventional New Zealand housing model starts with living in the parental home, moving to rental accommodation, buying a first home, and then trading up homes as family and employment situations change (Davey, 2006). People may trade down homes as children leave home or retirement nears. At later stages, people may also sell their house to pay for their retirement."*

As we have very limited residential land available in urban Wellington I would like to propose that the Council review the "Infill Housing" policy developed in 2007 and your long term strategic planning for housing design taking into consideration:

- The aging population
- Changes in patterns of family formation and dissolution
- Multi generation families living together with the growth of non-European ethnic populations

To be successful in your Wellington Urban Growth Plan it would be helpful to:

- reduce the "red-tape" involved with applying for a building or resource consent
- improve administrative processes from the Council's Building department
- have a more user friendly website to search for information

- encourage your staff members to be more customer focus
- improve internal and external communication
- have a more transparent customer satisfaction survey

13 October 2014

Wellington City Council  
Email: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

**Submission on Wellington Urban Growth Plan 2014-2043**

Contact: Sue Watt, 91 Majoribanks St, Mt Victoria, Wellington 6011  
Phone: (04) 384 8208  
Email: [whathouse@xtra.co.nz](mailto:whathouse@xtra.co.nz)

I am submitting as an individual.

My comments are made on some aspects of the draft plan in the context of the Council's stated goals for Wellington in *Wellington Towards 2040: Smart Capital*: a people-centred city, a connected city, an eco-city, and a dynamic central city. I have read your lavish and expensive glossy document – I prefer plainly presented information. The 2043 time horizon does not appear to match the contents which are mostly projects and actions for the short-term to medium-term to be included in the next Long-Term Plan 2015-25.

**Strategic directions requiring more emphasis**

*Climate change and greenhouse gas emissions reduction*

This is mentioned mainly as regards managing the negative impact of climate change when more important is action to reduce or minimise greenhouse gas emissions. The draft plan allegedly supports reduction targets for greenhouse gas emissions (page 19) and includes two projects (page 60) on advocating low-carbon public transport and buildings, and encouraging sustainable buildings. But these good intentions are totally undermined by the inclusion in the draft plan of completing the Wellington's so-called roads of national significance, ie. the Basin Reserve flyover, Kapiti expressway, Petone to Grenada link road, and Transmission Gully. I totally oppose this aspect of your draft plan.

The Council's continuing support for the Basin Reserve flyover in particular is completely ridiculous in light of the Board of Inquiry's decision not to grant resource consents. Rather, you should be investing your resources and energy in developing ground level improvements such as was proposed to the Board in the BRREO (Basin Reserve Roundabout Enhancement Option) option. This option includes improvements for pedestrians and cyclists. I am aware too that the leader of the Council's *Toward 2040: Smart Capital*, Jan McCredie, was one of the expert witnesses opposing the flyover on urban design grounds. I suggest you work on converting the streets between the Mt Victoria and Terrance tunnels back to local streets as they are not a state highway (SH1 goes to nowhere south from here) before a giant barrier separates the inner city through an area of national heritage significance.

*Health*

An important factor to a people-centred city, which is not clearly stated in the draft plan, is for Wellingtonians to be healthy if they are to enjoy the city's benefits. The draft plan's intent to increase inner city residential development will increase the number of people vulnerable to the intensified effects of air pollution and noise from vehicles. Also, air pollution, and in particular diesel particulates, are strongly implicated in causing or contributing to asthma in children. In addition, a 2013 report, *The Cost of Physical Inactivity*, co-authored by the Regional Council, suggests local government can address the financial and health costs of inactivity through urban design, transport planning, development of pedestrian and cycling infrastructure, and use of parking charges as a disincentive to private car use.

*Light rail*

Given that the draft plan is for the long-term, I believe it is imperative that it gives proper consideration to a light rail system in Wellington City. I note it was included in growth spine options but incorrectly costed by including the cost of a second Mt Victoria tunnel when it could use the bus tunnel. Despite what is commonly said, population size is not a barrier – French cities such as Tours (population 135,000) and Montpellier (population 255,000) have similar populations to Wellington City and excellent light rail systems.

**Transport**

As someone who walks and cycles (cycle lanes only) in Wellington, I fully approve of the apparent priority

given in the Executive Summary to walking and cycling, then public transport and lastly to roads. It is regrettable this order of priority and the strategic emphasis placed on being people-centred and eco is not carried through to the projects and actions. These clearly still invest heavily in major road developments, and favour vehicles rather than active modes in road space allocation.

I applaud projects and actions to improve cycling networks and safety, and pedestrian accessibility and safety. But I would like to see a much clearer stated commitment to investment in actions such as the Great Harbour Way from harbour entrance to Red Rocks, rather than just planning, monitoring and review. I also suggest more efforts to separate walking and cycling as they do not mix well, and conversion of vehicle lanes to cycle lanes on key cycle routes.

I also agree with your plans to encourage more public transport use and energy efficiency, and achieving a fully-electric service as soon as possible. I was dismayed at the great-leap-backwards decision to scrap the trolley buses in favour of diesels and hybrids. Also, I do not think that giant, 100-passenger buses in the inner city will improve speed and efficiency of service, given the 30kph speed limits and tight corners, and apparently will not use the Mt Victoria bus tunnel for eastern suburbs but rather add to problems at the Basin Reserve and Mt Victoria tunnel. I suggest you reconsider these decisions, and as suggested above, make a clear long-term commitment to light rail.

Given your stated goals, I am baffled about your inclusion in the draft plan to assist the NZ Transport Agency in spending enormous public monies on more motorways such as the Basin Reserve flyover, Kapiti expressway, Petone to Grenada link road, and Transmission Gully. You are not serving the future of Wellington well by these actions to undermine all the positive steps proposed. Surely you do not want to be remembered as the Councillors who brought the Auckland fiasco to Wellington.

#### **Urban growth and development**

I agree with the plans for residential and commercial growth to occur mainly in the central city and along the 'growth spine' as this accords with Wellington's goals. But I do not support the proposed greenfield growth areas to the north of the city as they are contrary to keeping Wellington compact, connected and eco. Rather, they represent urban sprawl, and will increase dependence on private car use to access jobs, goods and services. A better alternative is the draft plan's suggested residential intensification in other suburban areas to the east, south and west of the central city. These areas are already close to natural and other open space, are within walking, cycling and public transport distance from the central city and have community and infrastructure services.

I also agree with plans for new buildings and improvements to existing buildings to be energy-efficient, water-sensitive, well-designed, and earthquake resilient. Any development must also preserve cultural and heritage values and existing neighbourhood character, including in areas of national heritage significance such as near Government House, the War Memorial, police barracks, Basin Reserve, cable car, Parliament buildings, Botanic Garden and Carter Observatory.

I am not sure why your plans include a new convention centre and new concert venue and I am totally opposed to both. They are a waste of ratepayers' money when we already have six excellent Council-owned venues that are flexible as to use within CBD walking distance. The money would be better spent on strengthening the Town Hall and promoting the six venues as part of developing the Civic Centre. Lower Cuba St has been recently redeveloped and I do not understand why that is being done again.

#### **Natural and other open space**

Residential intensification will require more easily-accessible public open spaces and more children's playgrounds, if Wellington is to continue to be people-centred and liveable. I agree with plans to enhance the city's green infrastructure (ie. parks, open spaces, landscaped areas, and suggest you give priority to 'green' ie. a mix of trees, vegetation and grass over concrete and paving as it facilitates rain absorption and trees provide shade and more seating. In addition, the waterfront and Town Belt must be maintained for free public access and not privatised through buildings for businesses and sports clubs.

#### **City resilience**

I have been involved in local civil defence activities in Mt Victoria and I am surprised there is nothing in the draft plan to ensure there is adequate community support in the event of a major disaster. I suggest there should be as communities like ours will have to fend for ourselves and support each other in an emergency.

## Wellington Urban Growth Plan

**Name:**

---

**First Name:**  
Robert

**Last Name:**  
Wenkove

**Street Address:**  
58 Glen Rd

**Suburb:**

**City:**  
Wellington

**Phone:**

**Email:**  
rwenkove@gmail.com

**I am giving this submission:**  
as an individual

**Your comments on the draft plan:**

Further housing development in Kiriwiri (page 32) is not consistent with the City Resilience objectives in the draft plan (page 61).

Kiriwiri is largely built on land identified as being at very high risk of tsunami, liquefaction and ground shaking on Greater Wellington Regional Council maps. This is land that is likely to be red zoned in a future large earthquake.

Wellington City Council should be developing high-risk land like this for recreation, for example parks, reserves, or sports fields, not encouraging commercial and residential development there.

Instead, I suggest redeveloping the under-utilised Berhampore Golf Course for housing. This is good land, and is well located in a the housing and transport corridor between Newtown and Island Bay. Most of this golf course land is at relatively low risk of earthquake hazards, according to Greater Wellington Regional Council hazard maps, so is much more appropriate for residential and commercial development.

Email received in submission for the Urban Growth Plan on 12/10/2014  
BUS: Growth Plan Cc'd in on an email response to Malcom Sparrow.

Dear Council Sparrow,

That is excellent news. I hope you will fully support the change and indeed advocate for its extension to other locations such as around the Linden shops.  
You say that the plan could affect the culture and character of central Tawa. Isn't that exactly what we need? Some change. At present we are seeing a slow death of the centre as retail struggles - where are the shops in the New World mall? A moderate amount of densification is essential to support the shops and facilities for the benefit of all residents. More users for the trains, readers for the library and so on.  
Some variety in the housing stock in Tawa would be great for older residents such as ourselves who wish to down-size but not leave the area.

Thanks for the opportunity.  
John Allard

-----Original Message-----

From: Malcolm Sparrow  
Sent: Saturday, October 11, 2014 8:44 PM  
To: Undisclosed-recipients:  
Subject: Your views on the WCC's draft Urban Growth Plan.

Your opportunity to express your views to the Council:

You may or may not be aware that one of the proposals in Wellington City Council's current draft Urban Growth Plan includes "medium density" housing in Tawa. This may allow dwellings up to four levels high to be constructed in the centre of Tawa in the vicinity of private residences.

This plan could affect the culture and character of central Tawa.

Tawa residents are encouraged to have their say on the proposals. To find out more, see <http://wellington.govt.nz/have-your-say/public-inputs/feedback/open/wellington-urban-growth-plan>

You can express your views in a short and simple statement online. PLEASE NOTE that the Council has extended the closing date for submissions until this coming Friday, 17 October.

If you wish to discuss this further, call Robert Tredger (Tawa Community Board chair) on 232 5982 or Margaret Lucas (Tawa Community Board deputy chair) on 232 7284.

Cheers

Malcolm Sparrow  
On behalf of TawaLink.com  
[info@tawalink.com](mailto:info@tawalink.com)

## Wellington Urban Growth Plan Feedback form



**Tell us what you think**

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:
  - Post**
    - Freepost
    - Wellington Urban Growth Plan (COPO02)
    - Wellington City Council (CAB2)
    - PO Box 2199
    - Wellington 6140
  - By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
  - By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

**Enter your name and contact details (\*mandatory fields)**

Mr.
  Mrs.
  Ms.
  Miss.
  Dr.

First name: 
 Last name:

Street address:

Phone/mobile: 
 Email:

**Your feedback**

I am making feedback:
  as an individual
  on behalf of an organisation

Name of organisation:

**Feedback is required by 5pm on Monday 13 October 2014.**

**Privacy statement**

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Please provide your feedback here. Add extra pages if you need to.

1. RE NEW HOUSING IN TARA CENTRAL - AGAINST

2. RE STEARNS VALLEY GROWTH - PROVIDED GOOD REASONS FOR THIS ARE ACCEPTED - O.K.

1st fold here - faster here once folded

Thank you for your comments

Please return this feedback form by 13 October 2014

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Wellington City Council



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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

## Wellington Urban Growth Plan

1.

**First Name:**

Karen

**Last Name:**

Bishop

**Street Address:**

13 McKeefry Grove

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

**Email:**

karen.bishop@vodafone.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I can see the need for planning for more housing but am concerned over the possibility of allowing buildings over 2 stories high in Tawa. I feel that higher buildings will ruin the character of Tawa and turn it from a great suburb with a good sense of community into a mass of high rise apartments more akin to a big city centre. With higher buildings Tawa will lose its identity and become an extension of Wellington city itself.

# Wellington Urban Growth Plan Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by

– Post

Freepost  
Wellington Urban Growth Plan (COPD02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

## Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

JUAN

Last name\*

BOOCOCK

Street address\*

44B OXFORD ST., TAWA, WELLINGTON 5028.

Phone/mobile

2324356

Email

## Your feedback

I am making feedback  as an individual  on behalf of an organisation

Name of organisation

Feedback is required by 5pm on Monday 13 October 2014.

## Privacy statement

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Item 3.1 Attachment 3

Please provide your feedback here. Add extra pages if you need to. Tawa has always been a lovely commercial area and should remain so. If you're considering the new world centre you should think again. I can't imagine a 3 or 4 storey building buildings going there. It isn't just a car park for WW but it used on many other occasions, ie any big funeral or church gathering, weddings, starting hair for Angas Day parade. even football practice at times. after all there's nowhere else to park as parking on the main street is limited and adjacent streets near there all always occupied by commuters. We don't even have a rubbish bin outside WW so rubbish is dropped everywhere and after blows down our drive we used to have bins each side of the building but someone in the wisdom saw fit to remove them. Imagine the mess with more buildings and lots more occupants. And where will any children play out on the street? I would advise you don't central Tawa alone. We see some of the in-fit having going up in Johnsonville and it looks so quiet as it was built and not ab-  
shutting. think again W.C. what about the junction?

new world centre  
WW  
rubbish

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

Free Post Authority Number 2199  
Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council

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Wellington City Council (CAB2)  
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Wellington 6140
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  - By sending an email to: [growthplan@gwr.govt.nz](mailto:growthplan@gwr.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\* mandatory fields)

Mr.  Mrs.  Ms.  Miss.  Dr.

First name\*  Last name\*

Street address\*

Phone/mobile\*  Email\*

### Your feedback

I am making feedback  as an individual  on behalf of an organisation.

Name of organisation\*

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Please provide your feedback here. Add extra pages if you need to.

There are plenty of sites that  
could be filled on some of the  
land on the hill sides of a lake

1st fold here 2nd fold here 3rd fold here

Thank you for your comments

Please return this feedback form by 13 October 2014

2nd fold here

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Absolutely Positively  
Wellington City Council

Free



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Wellington City Council (CAB2)  
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Wellington 6140

## Wellington Urban Growth Plan

1.

First Name:

Diana

Last Name:

du Toit

Street Address:

31 Lincoln Ave

Suburb:

Tawa

City:

Wellington

Phone:

2323882

Email:

diana.dutoit@xtra.co.nz

I am giving this submission:

as an individual

Your comments on the draft plan:

I am very concerned about and strongly opposed to the Council's plan for increasing the population density in Tawa. It is well known that high density population areas often has social problems and it is concerning that the currently tranquil and desirable area of Tawa will change to a problem area.

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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Freepost

Wellington Urban Growth Plan (COPO 02)

Wellington City Council (CAB2)

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Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)

- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.



### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

Ron

Last name\*

ENGLAND

Street address\*

8/16A Lynahurst Road, TAWA 5028

Phone/mobile

04/8970583

Email

r7were@yahoo.co.nz

### Your feedback

I am making feedback  as an individual  on behalf of an organisation

Name of organisation:

**Feedback is required by 5pm on Monday 13 October 2014.**

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**Please provide your feedback here.** Add extra pages if you need to.

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*1st fold here - fasten here once folded*

Thank you for your comments.  
**Please return this feedback form by 13 October 2014.**

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*2nd fold here*

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**Absolutely Positively**  
**Wellington City Council**  
Me Heke Ki Pōneke



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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

Our knowledge, views, opinions, are worth the best information from everywhere, space, and undersea. We need to be informed before feedback is sought.

Why doesn't W. City C. have a space-wide, City Info. Hub (praps in the City Gallery); where the best city knowledge is accessible and enhance-able by local citizens; many well-travelled.

Human beings come first, human ecology is paramount.

We have to get wise and ahead on traffic handling. The Petone "Link" to Grenada, should be underground with Lincolnshire Farm kept complete, for human settlement. Ditch the nonsense of R.O.N.S. - isn't it Transport of Global Significance we need - T.O.G.S., a balance of rail (Double Track to Palmerston North) and road, sea and air (like AirNZ). AND better planning AND a new future-focussed, T. & C. Planning Act.

After the Tawa "Link Rd" meet in April, I asked the NZTA person, "Is there anywhere in the world that has solved traffic congestion?" He said, "one or two." Hardly a high probability. We never will, it's a myth. More roads bring more vehicles. Not less carbon or vehicles traffic jams.

Government talks up innovation, why can't it be across human & natural spectrums - not just quick-to-decline economic nostrums, (whatever happened to the rock-star economy.)

When will W. City C. display all the entries in the "Breathe" Urban Village competition, and others from O'ceas' AND bring FEESTA, Festival of Transitional Architecture. Art Exhibitions, etc, have their place, but we have to live and work in architecture and landscapes.

Ron England 897-0583 Lynahurst Rd TAWA

## Wellington Urban Growth Plan

Response ID: 38 [View](#)

Wellington City Council would like your feedback on the draft Wellington Urban Growth Plan, which will update and replace our existing urban development and transport strategies.

Complete the form below and send it by:  
5pm, Monday 13 October 2014

Note: All submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

[Privacy Statement](#)

### Submitter Details:

First Name:

Janice

Last Name:

Ferguson

Street Address:

27 Tremewan Street

Suburb:

Tawa

City:

Wellington

Phone:

04 2327538

Email:

janferguson@gmail.com

I am giving this submission:

as an individual

Organisation name:

Your comments on the draft plan:

I am definitely not in favour of the draft plan as regards the proposed housing mix in Tawa especially any building above two storeys. This would have a very negative impact on the suburb which is a very pleasant residential area. Parking and pedestrian

**Item 3.1 Attachment 3**

access could be very adversely affected

---

**2. Thank you, Janice**

Thank you for giving the Council your views on the draft Wellington Urban Growth Plan.

[Back to Consultation page](#)

Email Goes to Urban Growth Plan

Email Goes to Submitter

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:

**Post**

Freepost  
Wellington Urban Growth Plan (COPO.02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)

- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

Liz

Last name\*

Fitzsimmons

Street address\*

15 Armour Ave, Mt Victoria, Wgh 6011

Phone/mobile

04-971 6333

Email

lizf@clear.net.nz

### Your feedback

I am making feedback



as an individual



on behalf of an organisation

Name of organisation

**Feedback is required by 5pm on Monday 13 October 2014.**

#### Privacy statement

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Please provide your feedback here. Add extra pages if you need to.

It is inappropriate for laws to be  
in area of growth!!  
No 4 story buildings  
No intensification please.

M. Fitzgerald 6/10/14

1st fold here - fasten here once folded.

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

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Wellington City Council  
Me Heke Ki Pōneke

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Wellington 6140



Please provide your feedback here. Add extra pages if you need to.

I am a teacher at Tawa College,  
our students come from a community  
that has a "rich" ethnic diversity  
in culture. Creating high rise living  
apartments will effect our wider - community  
in many negative ways: we will be seen as  
a "low decile" community, eye saw on the urban  
landscape and will take away the neighbourhood aspect

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

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Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

## Wellington Urban Growth Plan

1.

**First Name:**

Brian

**Last Name:**

Frampton

**Street Address:**

18 Ngatitōa street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

0274420198

**Email:**

framo@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I would not be happy to see high rise apartments in the residential area of Tawa with long standing residents losing there privacy and the increase of traffic entering the main road

## Wellington Urban Growth Plan

1.

**First Name:**

Margaret

**Last Name:**

Goodway

**Street Address:**

56 Fyvie Avenue

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042327514

**Email:**

goodway.family@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I have already given my reasons once before and don't know why you keep bringing this up. We do not want 3 story buildings in Tawa and we don't want infill housing. The people of Tawa have already told you that this isn't necessary and not what we live in Tawa for. We like the community as it is. Please leave it alone and stop trying to force your views on Tawa people. We don't need high buildings and we don't want infill housing and we don't need heaps of roads. We are well serviced with roads and the council does a great job in maintaining our roads. We can get to Wellington and Hutt without problems. Concentrate on State Highway 58 if you want to upgrade a road and make it safer. Plenty of land at the road edges to widen without interfering with Tawa life styles.

Email received in submission for the Urban Growth Plan 13/10/2014 to BUS: Urban Growth Plan

Submission from:  
Mr Edward Hawkins  
57 Bing Lucas Drive  
Tawa  
0212389845  
e: [drakesacre@clear.net.nz](mailto:drakesacre@clear.net.nz)

I am providing feedback as an individual.

I wish to express my concern at the lack of definition with regard to the implications of "medium density" references in relation to the areas of Tawa, especially if this definition is intended to be the same as objected to in earlier proposals, then known as 'high density' permitting up to 4 levels of buildings over a wide area of central Tawa. There is not enough information provided to be able to make any reasonable decision with regard to the potential impacts on the Tawa environment and community. Therefore any decision by Council representatives should be deferred with respect to Tawa environment until greater definition is produced for public comment.

The suggestion that there should be a move to implement 'medium density' in Tawa would appear to be inconsistent with the objective of a 'Compact City'. The Tawa valley is physically separate from the rest of Wellington City and should be a special area for retention of its 'village' environment within the timeframe that the plans is purporting to cover.

I understand that feedback is now closing later this week.

E.B.Hawkins

## Wellington Urban Growth Plan

1.

First Name:

Ferry

Last Name:

Hendriks

Street Address:

3 Mayfair Place

Suburb:

Tawa

City:

Wellington

Phone:

0276029567

Email:

ferry.hendriks@gmail.com

I am giving this submission:

as an individual

Your comments on the draft plan:

The Wellington Urban Growth Plan talks about investigating key locations for medium density housing. One of the areas mentioned in the plan is Tawa central. Putting medium density housing into this area would negatively impact the culture and character of this special area. Many residents in Tawa have chosen to live here because of its friendly and green character, or because Tawa affords them the ability to live on a classic 1/4 acre section. Increasing the housing density impacts on these aspects and in effect turns Tawa into just another crowded and busy suburb.

Submission to Wellington City Council Wellington Urban Growth Plan 2014-45

My Details

Name of Submitter : Richard Herbert  
Address of Submitter : 8 Duval Grove, Tawa, Wellington 5028  
Phone : 8037878  
Email : herbert.r@xtra.co.nz

I am making this submission as an individual.

Submission Comments on Specific Changes proposed in the Draft Annual Plan

GENERAL

The Plan has a number of aspirational outcomes – but there is no mention of how it is to be determined when these outcomes are achieved or whether progress over time is moving further towards these outcomes or any quantitative measure for these outcomes; e.g. for liveable, vibrant, walkable, attractive and safe city; environmental quality; emergency preparedness; green landscape values; natural environment benefits; availability of open spaces; value of biodiversity; value of climate change mitigation; and sustainability, etc

If the population trend is aging as forecast then this is also going to change the demand for some infrastructure like public transport, healthcare and hospital facilities. Aging populations are also likely to prefer to live on flatter land areas rather than hilly terrain and on low rise housing rather than multi-story, yet the Plan seems to be focusing on many of the flatter terrain suburban areas around the city, including Tawa, to be higher density suburban centre areas. I'm unconvinced that senior members of the population are going to want to live in multistorey dwellings.

**Transport and Movement** : I thank Councillors for their past support for the establishment of the Tawa Valley Pathway. This facility that is already being seen of great value to the local community of users in being able to provide an easier walking and cycle route to get around Tawa whether for recreation usage or for work/school commuting purposes. This amenity will be further progressively enhanced with community group plantings adding to the local biodiversity and community health benefits.

I support Wellington City Council endeavours to support public transport and alternative Eco-friendly transport methods.

As Councillors are aware there have been 100's of millions of dollars spent to upgrade the Wellington Regional neglected suburban train system for which commuters are grateful. However, an area that seems to have been overlooked and fallen into a crack between Wellington City Council and Greater Wellington is the expansion of commuter Park 'n' Ride capacity to keep up with the demand created both by these enhancements and continued pressure from fuel price hikes, population expansions to the northing suburbs of the city, and the reduction of public car parking spaces in Central Wellington due to earthquake closure of public car parking buildings. I therefore support the proposed action of the Plan to "investigate solutions for locations where people are parking to support their use of public transport".

Presently at all of the five rail stations through Tawa, existing Park 'n' Ride car parking is either not specifically provided for or the designated areas are full at peak times and commuter car parking

Submission to Wellington Urban Growth Plan 2014-45, from R. Herbert

page 1 of 3

regularly overflows into neighbouring side streets. At Linden station also there could also be improvements made in both Rawson Street and Hinau Streets to widen the roadway into the road reserve area and development of angle parking spaces to increase the capacity available, like was earlier done further along Duncan Street at Tawa rail station.

Both Linden and Takapu stations are capturing increased Park 'n' Ride pressure from the continued subdivision along Woodman Drive and Bing Lucas Drive areas, and for Takapu this is compounded by commuters from further afield (Grenada, Churton Park, Stebbings Valley and further north) also using this station as the closest station (in travel time) to central Wellington.

I thank GW for recent proposed additions to the Park 'n' Ride car parking at Takapu Road and Tawa stations but this is likely to only be a short term gain and further additions can be expected to be required to support the planned population growth during the term of this Plan. Especially so also given the proposed action in the Plan to "Discourage the provision of commuter parking in the city centre".

The Plan mentions a possible access route to the future northern Stebbings Valley greenfields development area via Tawa. As Councillors will be aware there is strong opposition from local residents to this route being used through existing suburban streets which were not designed with this intention. A preferred route could be made off the Marshalls Ridge via part of the Arohata Block and adjoining sections south of Tawa to key directly into the motorway access point at Takapu Road – in a similar fashion to how the Winchester Drive extension was constructed.

**Tawa Suburban Centre:** The proposed suburban centre designation to support the continued viability of the existing Tawa central and Tawa Junction business centre is a commendable strategy. However I believe that to be successful in future rounds of consultation, the suburban centre area needs to be more clearly delineated so that it is clear to local residents who may be affected. Both local residences, prospective developers, and the community at large, also want to see clearer specifications on the scale and quality of housing developments that are going to be permitted within this designation, and also for wider in-fill housing in the future.

I also think that the designation would be more successful and reduce the potential undesirable aspects on the wider community if the initial suburban centre designation area was reduced in size to the flat area around and between the existing commercial zoned areas. This would limit the undesirable outcome of bespoke one-off monstrosities appearing haphazardly over a wider area of the community. Once the development of this smaller area was seen to be successful and the benefits more accepted by the wider community and population forecasts seem to be actually realised in the area, then the boundaries of the area could look to be expanded in future periods of the Plan.

I support the intention to upgrade the Suburban Main Street for Tawa and also support the concept of Community Hubs which could be easily included in the development for Tawa junction site which is also close to suburban train transport connections.

**Natural Environment:** The continuation of Wellington as a Liveable City calls for the continuation of the existing plenty of Open Spaces and green areas throughout the city and retention of Landscape values that Wellingtonian love about their city – easy access to water and green hillside viewsapes. Support for these aspects in the Plan is commendable and strongly supported.

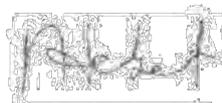
I therefore also suggest and support that as part of the Stebbings Valley greenfields development area that the existing regenerating indigenous bush area above Redwood Bush along the western hills of Tawa be retained as part of a subdivision contribution and formally included as part of the Redwood Bush KNE area along with the bush at the head of Stebbings Valley below the airstrip block that forms the headwater catchment area for the Porirua Stream.

It follows also that any access road development between Stebbings Valley and Tawa does not pass through the existing regenerating bush area which is going to require a lot of cut and fill earth works to construction in this portion.

I strongly support the completion of the Skyline Walkway along the ridgeline of the Outer Greenbelt to complete the section of the route between Mt Kaukau and Spicer Forest. This would then provide a substantial recreational walk and cycle route link between the existing regional recreational focus areas of Makara Peak and Spicer/Colonial Knob.

I also strongly support the other proposed environmental strengths of the Plan, including more proactively implementing the *Biodiversity Action Plan*, the implementation of a Integrated Catchment management plans, and to facilitate support through reducing barriers for and promoting the awareness for energy efficient design and self generation of electricity, e.g. solar PV installations.

Yours Sincerely,



Richard Herbert  
13 October 2014

## Wellington Urban Growth Plan

1.

First Name:

Sally

Last Name:

Horan

Street Address:

9 Peterhouse Street

Suburb:

Tawa

City:

Wellington

Phone:

6442326000

Email:

horans@xtra.co.nz

I am giving this submission:

as an individual

Your comments on the draft plan:

I do not see the need for 4 storey buildings in Tawa

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

---

**Tell us what you think**

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    - Wellington Urban Growth Plan (COP002)
    - Wellington City Council (CAB2)
    - PO Box 2199
    - Wellington 6140
  - By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
  - By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499-4444 for more information.

**Enter your name and contact details (\*mandatory fields)**

Mr
  Mrs
  Ms
  Miss
  Dr

First name\* 
 Last name\*

Street address\*

Phone/mobile 
 Email

**Your feedback**

I am making feedback  as an individual  on behalf of an organisation:

Name of organisation

**Feedback is required by 5pm on Monday 13 October 2014.**

**Privacy statement**

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Item 3.1 Attachment 3

Please provide your feedback here. Add extra pages if you need to.

Please keep town as it is, a lovely village  
to live in. No high rises in the town centre.  
Any plans for future urban growth to be  
discussed in full with local ratepayers.  
Would be a great improvement if landlords  
were made responsible to keep rental property  
sections & verges tidy.  
We have been town residents since 1964.

fold here - fasten here once folded

Thank you for your comments

Please return this feedback form by 13 October 2014

fold here

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Absolutely Positively  
Wellington City Council

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>>> GOT A QUESTION?

Free



POST 11/11/14 CD N1115 P 6

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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

## Wellington Urban Growth Plan

1.

**First Name:**

Dary

**Last Name:**

Judd

**Street Address:**

7 Franklyn Road

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042323998

**Email:**

judd247@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

Very concerned re proposed medium density housing in Tawa destroying its character that attracts and keeps people living in its environment.

## Wellington Urban Growth Plan

1.

**First Name:**

Caleb

**Last Name:**

Lucas

**Street Address:**

17 Oxford Street

**Suburb:**

Tawa Wellington

**City:**

Tawa Wellington

**Phone:**

64277773388

**Email:**

cmilucas1@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

Tawa's character is built on it's small town community feel- expanding it and building on to it as planned will destroy this precious reputation that has made Tawa the place I know and love. If you believe more growth is going to come into the central cities (i.e Wellington and Porirua, build there it's that simple. Don't destroy small towns while doing it. If there is not enough room in the city for more buildings than maybe looking to expand it, is not the answer. Population growth is not always the most desirable outcome. Please keep Tawa as it is and preserve it's stunning reputation, thank you for considering this and the other submissions placed around the growth plan.

## Wellington Urban Growth Plan

1.

**First Name:**

Kura Joyce

**Last Name:**

Lucas

**Street Address:**

19 Sunrise Blvd

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042325581

**Email:**

m.hutchinson@paradise.net.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I don't think buildings should be 4 stories high in Tawa. It would change the feel of the place from a family area. That type of high density housing would be more suited closer to the city rather than a suburban family area.

## Wellington Urban Growth Plan

1.

**First Name:**

Margaret

**Last Name:**

Lucas

**Street Address:**

17 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

2327284

**Email:**

m.lucas@tra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

An aspect of the draft plan that I do not wish to go ahead is the provision of medium density housing within the Tawa area. Already, Tawa has more than its fair share of low cost housing. The fact that four storey buildings are allowed under the draft plan is not acceptable.

## Wellington Urban Growth Plan

1.

**First Name:**

Murray

**Last Name:**

Lucas

**Street Address:**

17 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

2327284

**Email:**

mim.lucas@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

My concern related to the draft plan is the proposed provision within the plan of medium density housing within the Tawa area. The proposal allows housing of four storeys which would negatively change the shape of housing in Tawa. I do not want these plans to go ahead. I need to point out that Tawa has presently more than its share of low cost housing. I also have concern about the possibility of linking Stebbings Valley to Tawa via a suburban street. If this goes ahead the link road could carry a large amount of through traffic which a suburban street is not designed for. On a positive note, I would have no difficulty with a cycle road which would take the pressure off Middleton Road.

## Wellington Urban Growth Plan

1.

**First Name:**

Nathanael

**Last Name:**

Lucas

**Street Address:**

17 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

2327284

**Email:**

ycitylucas@hotmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I strongly oppose 4 level buildings in the center of Tawa ..... particularly for housing ..... go back to the data of 2008 ..... you need to listen to the voice of Tawa ..... the majority of submissions said no then and it will not have changed ..... we like our village feel ..... have you not learnt from the chch quake ..... people don't want high rise.....

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by

**Post**

Freepost  
Wellington Urban Growth Plan (COPO 02)  
Wellington City Council, (CAB2)  
PO Box 2199  
Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)

- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*  Last name\*

Street address\*

Phone/mobile  Email

### Your feedback

I am making feedback:  as an individual  on behalf of an organisation

Name of organisation:

**Feedback is required by 5pm on Monday 13 October 2014.**

#### Privacy statement

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Please provide your feedback here. Add extra pages if you need to.

I OBJECT TO THE PROPOSED URBAN GROWTH PLAN  
PARTICULARLY IN RELATION TO THE AREA OF GROWTH IN  
TAUA. I DO NOT BELIEVE THAT THE PROPOSED AREA HAS  
BEEN PHYSICALLY SURVEYED IN DETAIL. I DO NOT BELIEVE  
CURRENT ROPEAN OWNERS HAVE BEEN CONSULTED. I OBJECT  
TO MY RIGHT OF OBJECTION TO A NEIGHBOUR DEVELOPMENT  
HAS BEEN REMOVED. ~~IT~~ ~~REMOVED~~ THEREFORE THE LOSS OF  
SUN IS A MAJOR ACCESS DIFFICULTIES BEING BOXED IN  
etc WITHOUT ANY RIGHTS OF REDRESS.

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Thank you for your comments

Please return this feedback form by 13 October 2014.

2nd fold here

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Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140



## Wellington Urban Growth Plan

1

**First Name:**

Doug

**Last Name:**

Miller

**Street Address:**

32 Pembroke St

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042327724

**Email:**

doug.miller@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I whole heartedly support the plan to allow for higher density housing in Tawa and the following comments specifically refer to growth in the Tawa-Uden area.

1. Higher density housing in Tawa with more people is essential to the survival of the local shopping centre. There are large supermarkets in Porirua and Johnsonville that attract many Tawa residents due to the lower prices and larger selection of stock. The existing supermarkets in Tawa need steady customer support to retain profitability.

2. Presently Tawa has a mixed architectural style that is nothing startling with some redeveloped properties within the general precincts of the shopping centre. It also has some excellent examples of poor quality in-fill housing. The proposed planning changes would ensure that higher density housing is confined to a defined area and do have some minimum land coverage rules.

3. Most of the recent new developments in Tawa flat are two levels with the occasional 3 or 4 level dwellings. These buildings have generally fitted in well with the surroundings.

4. The style of housing that the council seems to envisage would require several sections to build one block of units. This will not happen overnight and will require willing sellers and buyers to obtain suitable land. This being the case I expect to see a slow change to higher density housing and expect that any significant change will take at least 15 years.

5. The 'look' of any area depends significantly on the style of housing. It is essential to have robust planning guidelines to keep the quality of developments to a high level.

6. Needs to be good liaison with other greater Wellington city councils, government departments and Greater Wellington. For any higher population there are issues of services such as fresh water, waste water, improved public transport and schooling availability.

7. An increasing number of properties are rented and many tenants and new owneroccupiers are too busy to maintain gardens and lawns. This can lead to an area looking rundown. Higher density housing would be of benefit to this type of occupier.

8. Existing growth in the Northern Wellington area seems to be primarily in the one or two level bungalow style dwellings with new subdivisions primarily in Tawa, Churton Park & Newlands. There has obviously been a demand for this style of dwelling. If future growth is of a different dwelling style then some of these prospective future residents would likely look to new housing areas outside Wellington City.

9. The character of Tawa has changed over the last 20 years with many more rented properties, loss of some industrial properties and reduced variety of local shops. One thing we can be sure of is that the character of Tawa will change with or without any WCC planning proposals. It is far better for the WCC to look forward and consider how the area should grow than to leave housing developments in Tawa to be of a patchwork and non-planned nature.

Higher density housing in the suburbs has several other advantages:

1. It should improve the profitability of public transport as there will be more passengers on the bus and train routes.

2. Water and power infrastructure should be easier to provide.

3. Productive farm land is not used for urban sprawl.

4. There are good examples of higher density housing in some areas of Auckland and in other progressive cities of the world.

# Wellington Urban Growth Plan Feedback form

**Absolutely Positively  
Wellington City Council**

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**Tell us what you think**

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:
  - Post**
    - Freepost
    - Wellington Urban Growth Plan (COPQ02)
    - Wellington City Council (CAB2)
    - PO Box 2199
    - Wellington 6140
  - By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
  - By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)
- Please phone 499 4444 for more information

**Enter your name and contact details (\*mandatory fields)**

Mr  
  Mrs  
  Ms  
  Miss  
  Dr

First name:       Last name:

Street address:

Phone/mobile:       Email:

**Your feedback**

I am making feedback:  as an individual  
  on behalf of an organisation

Name of organisation:

**Feedback is required by 5pm on Monday 13 October 2014.**

**Privacy statement:**  
 All feedback (including name and contact details) is published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

**Item 3.1 Attachment 3**

Please provide your feedback here. Add extra pages if you need to.

I am interested in what is proposed for the Teara Centre. I have read the document  
Wellington Urban Growth Plan and its summary for the years 2014. I am concerned at  
the general nature of the documents as they apply to Teara. I see a map which suggests  
that the Teara Centre may extend from Cassels Reserve in the north to the Drive in the South,  
and from the railway line in the east to well up the western slopes of Central Teara hills.  
This is a very large area. In it as I understand it, residential buildings may be  
constructed up to 4 stories in height. I cannot tell what provisions will be made or are  
planned for parking, recreational facilities, additional schooling facilities. Nor can I tell  
what quality control will be required of these developers who will want to build a strong  
accommodation.  
This proposal will turn Teara's "village" and its associated "village atmosphere" into something  
quite different. Before such a change is made, much more information needs to be  
provided so that people can make sensible and rational decisions. We need, in fact,  
more time and much more information.

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

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Wellington City Council

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Wellington City Council (CAB2)

PO Box 2199

Wellington 6140

## Wellington Urban Growth Plan

Response ID: 49

Wellington City Council would like your feedback on the draft Wellington Urban Growth Plan, which will update and replace our existing urban development and transport strategies.

Complete the form below and send it by:  
5pm, Monday 13 October 2014

Note: All submissions (including name and contact details) are published and made available to elected members and the public. Personal information will also be used for the administration of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

[Privacy Statement](#)

### Submitter Details:

First Name:

George

Last Name:

Nelson

Street Address:

2792 Oxford street

Suburb:

Tawa

City:

Wellington

Phone:

0273192439

Email:

mirnan@yahoo.com

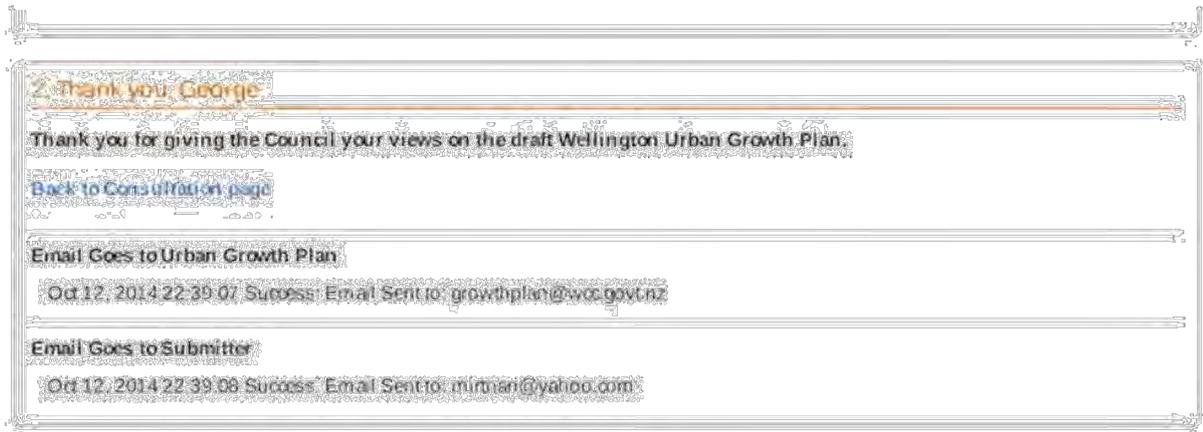
I am giving this submission:

as an individual

Organisation name:

Your comments on the draft plan:

Completely against high rises in Tawa. Was under impression that idea WAS VETOED last time. Who is behind the proposed resurrection. Tawa is a village not a place for high rise experiments.



# Wellington Urban Growth Plan

## Feedback form

*I really need office <sup>medium</sup> high density housing in the centre of Tawa, and am quite positive this type of housing/flats can only be to the detriment of the village atmosphere that has always provided with even more traffic congestion, and hitting off the retail shops, which give friendly returns. Disrupted the town.*

Absolutely Positively  
Wellington City Council

**Tell us what you think**

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:
  - Post
  - Freepost
  - Wellington Urban Growth Plan (COPO02)
  - Wellington City Council (CAB2)
  - PO Box 2199
  - Wellington 6140
- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

**Enter your name and contact details (\*mandatory fields)**

Mr  Mrs  Ms  Miss  Dr

First name: *Budgeta* Last name: *O'Shaughnessy*

Street address: *90 Oxford St Tawa*

Phone/mobile: *(04) 232 8535* Email: \_\_\_\_\_

**Your feedback**

I am making feedback  as an individual  on behalf of an organisation

Name of organisation: \_\_\_\_\_

**Feedback is required by 5pm on Monday 13 October 2014.**

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Please provide your feedback here. Add extra pages if you need to.

I very much oppose medium density housing in Tawa Central and am quite positive this type of housing development can only be to the detriment of the village atmosphere that has always provided (I have enjoyed life in Tawa for 50 years). More traffic and requested parking will kill off the detail market and generally reduce character and Tawa will become a sleepy and unattractive place.

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

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Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140



Email received in submission for the Urban Growth Plan 15/10/2014  
Sent to: BUS: Growth Plan

Hi WCC

As a resident of Tawa for over 15 years I'm concerned about the proposal for medium density housing in Tawa that would allow housing up to four levels high. I think it needs to be appropriate to the community and area. Even the apartments that are two levels high in Tawa (Oxford Street down from Tawa School; and Surrey St) are just awful and hardly in keeping with the area. The reason people come to Tawa is for a bit more space and access to good facilities so I would hate to see that jeopardised. I could liken this proposal to apartments above shops in Petone, but I think the reason it works out there is that Jackson Street is so long and varied. I do agree though that the fairly new apartments over Creative Curtains and the mechanics as you come into Tawa (opposite Kindercare) look good as they are just one storey and just seem to fit in nicely with the area. So in conclusion I think approval for up to four levels is too high for this area - two is enough but it must be designed to a high standard to fit into the area.

Many thanks

Rachel O'Shaughnessy  
32a Tawa Terrace  
Tawa  
Wellington 5028

P: 04 232 9957  
M: 027 284 2650  
E: [fixgas@xtra.co.nz](mailto:fixgas@xtra.co.nz)

## Wellington Urban Growth Plan

1.

**First Name:**

mervin

**Last Name:**

poir

**Street Address:**

58 Oxford Street, Tawa

**Suburb:**

Wellington

**City:**

Wellington

**Phone:**

6442323836

**Email:**

mervengeorge@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I disagree with the wcc process of infilling and want my vote to count against all such proposals of 4 level housing dwellings.

## Wellington Urban Growth Plan

1.

**First Name:**

metua

**Last Name:**

parr

**Street Address:**

58 Oxford Street, Tawa

**Suburb:**

Wellington

**City:**

Wellington

**Phone:**

6442323836

**Email:**

metuaparr@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I vehemently disagree with the proposal for the council to change the existing urban development proposal in suburbs. Please take your time to research and investigate further other proposals before changing the landscape of quaint suburbs like Tawa etc who have an appeal all of their own. Please stop all action to go ahead with your plan and seek further opinion from the people.

## Wellington Urban Growth Plan

1.

**First Name:**

John

**Last Name:**

Pitchford

**Street Address:**

86 Chester Road

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

**Email:**

pitchey@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

Hello,

Medium density housing in Tawa is a bad idea and I do not support it in any way.

Tawa is a suburb, not Wellington Central!

To place further large buildings of more than 2 levels will destroy the "cozy suburb" feel that makes Tawa so desirable a place to live.

Please do NOT allow this to happen!

Thank you.

## Wellington Urban Growth Plan

1.

**First Name:**

Jancis

**Last Name:**

Potter

**Street Address:**

1A Chester Road

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042323915

**Email:**

middleearth@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I am horrified to hear of the proposed plan for urban growth as it relates to Tawa. I understand that this same proposal was shelved some years ago because so many objections were received from the community. It seems outrageous that the scheme has been revived without wide-spread notification that would allow consideration and the submitting of objections from interested parties. It is with undue haste that this plan is to be implemented with such a short time frame in which to submit objections.

I have recently returned to this village (my childhood home) because it has that unique blend of old and new, rich and poor and rental and owner occupier homes. The benefits of living in Tawa are manifold. It is close to the city, it is reasonably well served by public transport, it has an eclectic mix of socio-economic groups, and there is space - space for trees, birds, and children to flourish; older residents choose Tawa because it is possible to live in a single level dwelling where they can walk to the amenities.

I do not object to slightly more intensive building (up to 3 stories) along the Main Road and Oxford Streets. In fact it makes sense to have shops or businesses on the street level and apartments on 1 or 2 floors above them. And a little more density around the Railway Station.

My concern with the new proposed plan is that far reaching, high-rise, 'affordable housing' will encourage a ghetto-like community.

## Wellington Urban Growth Plan

1.

**First Name:**

Claire

**Last Name:**

Richards

**Street Address:**

54 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042322595

**Email:**

richards.thehub54@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I am not in favour of medium density housing which is above two stories high in the centre of Tawa. I am in favour of more affordable properties for lower income families

## Wellington Urban Growth Plan

1.

First Name:

John

Last Name:

Ross

Street Address:

3 Franklyn Rd

Suburb:

Tawa

City:

Wellington

Phone:

2327649

Email:

cloud999@slingshot.co.nz

I am giving this submission:

as an individual

Your comments on the draft plan:

I find the plans for up to 4 level housing in Tawa very disturbing this would alter the character of the Tawa community greatly. Also a link road from Stebbings Valley will probably cause traffic chaos at the southern end of Tawa especially with the proposed road to Petone. I am totally against both proposals.

Thankyou

John Ross

## Wellington Urban Growth Plan

1.

**First Name:**

Gwen

**Last Name:**

Russell

**Street Address:**

42 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042327373

**Email:**

gwenrussell@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I have been a resident of Tawa for over 50 years and have been so disappointed with Wellington City Council, which we were forced into becoming part of many years ago. Our over 98% vote to remain a Borough was ignored. No we do not want infill 4 storey buildings in Tawa CBD. I'd understood Tawa had been exempted from this scheme after submissions were made several years ago when this was mooted first. Many of us elderly folk who have been more than happy to remain in this friendly environment have moved down onto the flat to be handy to shops, trains, buses, Churches, medical care and other amenities we can get to easily. We do not want to have these facilities spoilt by eyesores such as these new proposed buildings will impose on us. Maybe many will have to move into these accommodations in perhaps multi-storied buildings without lifts and most probably sharing living with families nearby and coping with noisy neighbours because the buildings may not have the sound proofing cheaper dwellings will have installed. Then where are you planning to house all the extra vehicles which will be brought into the area. I am opposite New World now and their car park is often very full not to mention the rail commuters who begin to park outside my place from shortly after 6 a.m. each work day and gradually fill a large part of Oxford St North and South. Likewise in Melville St and Cambridge Street daily. I and many other locals do not want these buildings to be built.

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council

**Tell us what you think**

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:
  - Post**  
Freepost  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CA82)  
PO Box 2199  
Wellington 6140
- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

**Enter your name and contact details (\*mandatory fields)**

Mr  Mrs  Ms  Miss  Dr

First name: Gwen Last name: Russell

Street address: 42 On-off St.

Phone/mobile: 04/2327313 Email: gwenrussell@xtra.co.nz

**Your feedback**

I am making feedback:  as an individual  on behalf of an organisation

Name of organisation: \_\_\_\_\_

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Please provide your feedback here. Add extra pages if you need to.

ADDITIONAL  
THIS IS MY SECOND SUBMISSION BUT PLEASE DO NOT IGNORE IT BE  
CAUSE I AM REALLY SCARED OF THE FUTURE FOR MYSELF & MY ELDERLY  
NEIGHBOURS WHO BY THE WAY ARE MOVING ALL RAILROADS/1/2 MILES  
BY THE SOUNDS OF THINGS) THIS PROPOSED NIGHT SOUNDS MANAGEMENT BLOCKS  
ARE TERRIFIED I ASK THE COUNCIL FOR 24 HOURS POLICE PROTECTION  
OR SIMILAR AS WE WILL BE VERY VULNERABLE DURING OUR RELOCATION  
BY NOT A STRUCTURE AS MOST OF US ARE ALONE IN OUR HOMES AT  
EIGHTY YEARS OF AGE & MANY ARE OLDER, PUT YOURSELVES IN OUR  
SITUATION.

1st fold here - fasten here once folded

Thank you for your comments

Please return this feedback form by 13 October 2014.

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Absolutely Positively  
Wellington City Council



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Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

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Email received in submission for UGP 10/10/2014 to BUS: Growth Plan

Submission from Peter Saxton  
4 Romney Sq, Tawa  
2327303

I am opposed to the method of attempting to improve the vibrancy of Tawa Centre by the inclusion of medium density housing.

Tawa is already a proven vibrant centre, depleted slightly by the inappropriate inclusion of a new supermarket at the southern fringe of the suburb.

Tawa has had continued growth of a variety of housing by the present regulations. To change this trend with more extensive and taller residential units will cause considerable deterioration to amenities of existing dwellings. Due to the hilly terrain, there will be overshadowing, loss of privacy and increased problems with vehicle access and parking.

Peter Saxton

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

### Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by

**Post**

Freepost  
Wellington Urban Growth Plan (COPO 02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

Last name\*

VALERIE SAXTON

Street address\*

4 ROMNEY SQ TAUA

Phone/mobile

Email

0232 7303 SA 2199 V.Saxton@paradise.net.nz

### Your feedback

I am making feedback:  as an individual  on behalf of an organisation

Name of organisation:

Group of concerned Taawa Residents

Feedback is required by 5pm on Monday 13 October 2014.

#### Privacy statement

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**Please provide your feedback here.** Add extra pages if you need to.

Attached

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Thank you for your comments.

**Please return this feedback form by 13 October 2014.**

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Free Post Authority Number 2199

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke



FREEPOST  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

Item 3.1 Attachment 3

Subject: WCC

From: Valerie Saxton <v.saxton@paradise.net.nz>

Date: 10/10/2014 11:33 a.m.

To: [REDACTED] W.C.C. [REDACTED]

Wellington Urban Growth Plan Feedback submission

Tawa is a village with a special character-

It is on the outskirts of the city and most people come out here for a bit more space, sun, light, vegie garden, some trees and birds etc.

It is good for many older people who can get single storey dwellings on flat land, and for families who can have space for the children to play in the garden. This is why people come to Tawa and the community has naturally grown and evolved to reflect this. It is a balanced community. It would be disastrous to change this balance by superimposing a theoretical scheme which looks tidy on paper but doesn't take real people into account.

In 2008 the residents showed in their many submissions their opposition to the plans for intensification and all that is involved. The same views are held today but the time frame for consultation means that many people are just learning about it and will not have time to make a submission. I hope this will be taken into account.

The intensification should take place closer to the city [e.g. Ngāio, Island Bay etc.] or it should be in the wider Regional Hubs e.g. Porirua, Lower Hutt, Petone. It is not needed or appropriate in Tawa.

Valerie Saxton  
2327303

V. M. Saxton

## Wellington Urban Growth Plan

1.

**First Name:**

Russell

**Last Name:**

Smith

**Street Address:**

18 Oxford Street

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

2326884

**Email:**

julerrussellsmith@paradise.net.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

Any new housing in the Stebbings Valley/Tawa area should be restricted to two stories in height to blend in with the existing landscape.  
I am in favour of connecting Stebbings Valley to Tawa. This would benefit businesses in Tawa and increase the use of Tawa's facilities.

## Wellington Urban Growth Plan

1.

**First Name:**

Kevin

**Last Name:**

Sole

**Street Address:**

9 Mayfair Place

**Suburb:**

Wellington 5028

**City:**

Wellington 5028

**Phone:**

6442320653

**Email:**

soleelectrical@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

Tawa's unique personality needs to be maintained. I object to highrise dwellings in the central area, loss of backyards, sun and outlooks. Increased density housing will decrease Tawa as a whole.

## Wellington Urban Growth Plan

1

**First Name:**

Stephanie

**Last Name:**

Sole

**Street Address:**

9 Mayfair Place

**Suburb:**

Tawa

**City:**

Wellington 5028

**Phone:**

6442320653

**Email:**

soleelectrical@xtra.co.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I object to any plan that would enable the construction of high rise housing in the Tawa central area. Backyards, outlooks and sun are important aspects of leading a healthy life, we will regret their loss in the future.

Email received in submission for UGP on 06/10/2014 to BUS: Growth Plan from Jeanette Taylor

"We wish to protest most strongly to the Wellington city councils plans for growth in Tawa. It is evidently the same plan as we were presented before and there were over 700 submissions objecting from the people of Tawa. No action was taken and Tawa was excluded from the list of areas chosen to become areas of change. It seems obvious that the council is ignoring the wishes of the people of Tawa and seem instead trying to steamroll a plan of development. That the people of Tawa have said very clearly they do not want.

The reasons are the same. The plan takes no account of the topography of Tawa and the problems of inadequate infrastructure. Already Tawa is experiencing traffic congestion and other associated problems. The area is not suited to any high rise development. we have said this all before.

Any intensive housing development should be much closer to the city.

Please listen to the concerns of the Tawa people

Jeanette Taylor

Ingatlon street  
Tawa

Sent from my iPad"

Submission from Lindis Taylor

Email received in submission for UGP 06/10/2014 from Lindis Taylor

Sent to: BUS: Growth Plan

"I am overseas and have just been told by a friend that the council has revived it's earlier plan to push through a rejuvenated proposal that would allow high density housing in a quite wide area in Tawa. I was among the many who submitted objections last time and am more than a little disturbed that the council has so soon revived its intention to promote development that would radically alter the area's character

Once again, it seems to show an extraordinary lack of perspective to be promoting this kind of change 16km from the centre of a small city. For a city that shows a reluctance to develop a proper urban transport system, and I mean some form of light rail, through the city centre, let alone routes additional to what were created more than 80 years ago, it seems unusual to be pushing for more population in outer areas.

Significant growth will demand additional infrastructure of all kinds using money that would be better spent on inner city transport. It will change the character of Tawa, which the existing population has chosen as a place to live because it offers a more spacious environment, better for children.

It seems to be contrary to basic democratic principles to be acting in such a manner. It appears to be a very short time to allow for comments, especially if, as I'm told, it's a plan through 2040 or so. To say the least, it appears to suggest that it's being pushed through in order to avoid the build-up of opposition. And is it another ill-thought scheme, like the basin reserve fly-over, that calls in question the calibre and breadth of perspective applied by planners and councillors?

As I wrote in my earlier objection, I am not totally opposed to some very limited intensification: to a max three storied on the Main Road and within 50 metres of the shops around the Oxford St-Main rd intersection and between Cambridge and Surrey streets on the Main Road. And slightly more intensive use of the land around both Tawa and Linden railway stations might make sense. But nothing further. It goes without saying that I have always opposed the subdivision of existing sections over most of the district, making it increasingly hard to find sections suitable for ordinary children's play. For people living 16 km away from the city centre, I happen to be travelling though cities in Continental Europe where 10 km out of a city of 400,000, large properties and great spaciousness is the norm. It is easy to dismiss such comparisons, but the world has yet to come up with a basically more harmonious and socially cohesive environment for people living in big and not-so-big cities, than what has evolved in Europe over many centuries.

So I am strongly opposed to what I understand to be now proposed.

Please stop wrecking the existing character of my city!

R L H Taylor, 1 Ngatitua Street, Tawa.

Sent from my iPad

### Submission to the Wellington Urban Growth Plan 2014-2043

I came to New Zealand and Tawa in 1987, and have lived here ever since. I was married in Tawa, and we have raised our two children in Tawa, albeit that they left home for their University education.

Our home is on the Western hills of Tawa, and the views have changed dramatically since 1987. Tawa is divided by the Motorway, State Highway 1, and the main rail trunk line. With Transmission Gully starting to be built and the probable P2G roading, their impact on the view will be marked. NB The suggestion is that the Motorway will increase from four lanes to a probable six or more. The Eastern Hills were farmland, but are increasingly housing (around Woodman Drive) and forestry. Even the hills to the North are now filling with the new homes at Aotea. Over the hill to the South West, Churton Park and Stebbings Valley building continues over the farmland, until eventually there will be no identifiable border between the various suburbs! This I believe would be to the detriment of Tawa, Wellington and New Zealand. Do we really wish to become the morass that

is Auckland?

In order to protect the uniqueness that is Tawa, care has to be taken. The 2008 submissions from Tawa residents on the Urban Growth plan readily reflect the views of Tawa residents.

#### Transport

One of the benefits to living in Tawa is the ease of travelling to and from Wellington, be it along the Motorway, (provided it is not in peak hours) or by train. However it is imperative that Park and Ride facilities in Tawa keep up with demand. Park and Ride has already reached its capacity during the business week. Whilst some progress has recently been made by Greater Wellington Regional Council (GWRC) for Tawa and Takapu Road rail stations, with the increase of available park and ride spaces, there needs to be further investment in Park and Ride in the Tawa area stations for Tawa to continue offering the same standard in liveability and access to public transport infrastructure for the forecast new dwellings. Currently there are many complaints from residents close to the stations, whereby the parking along the side roads is such that it renders them limited to single lane traffic!

Additionally, Wellington City Council (WCC) should work with GWRC to increase the capacity of transport to the central city over the lifetime of this plan.

Cycling and walking between Tawa and Johnsonville is problematical!

#### Stebbings Valley

Whilst Stebbings valley area looks to be a good area for future urban growth, with many new dwellings, the connections with Tawa have not yet been formally planned. A link road with Tawa could have major effects on Tawa residents, should it proceed down a suburban back street in order to reach Central Tawa. This is inappropriate for the local roading network, as these streets were never intended to contain inter-suburban roads. The Urban Growth implementation plan should provide some clarity to this issue so Tawa residents can plan accordingly.

#### Suburban Centre

The designation of a suburban centre appears to be a good plan for growth in Tawa, however the size of the area proposed, which appears to cover the bulk of central Tawa, and the size and quality of dwellings that are supported by the plan are concerning. The area of the proposed Tawa 'suburban centre' needs to be clearly delineated to avoid ongoing confusion and unnecessary concern by residents.

If medium density housing means dwellings three or four storeys high, as well as terraced housing, I do not believe that Tawa has the social infrastructure nor the traditional infrastructure to support this growth.

Housing quality under this plan is also of concern. If the recent developments of 'high quality' housing in Johnsonville are an indication, the quality will need to be greatly improved for it to be acceptable in Tawa.

Suburban areas need to be attractive areas for families, and I doubt young families would wish to live in an apartment style housing unit in Tawa, when they could choose to live in the same style of housing in the central city, and be far closer to the amenities that the central city offers.

#### **NZTA roading developments**

The Petone to Grenada Link Road and Transmission Gully, both have major impacts on Tawa and its residents. These impacts need to be mitigated to ensure a positive outcome and therefore confidence in the continued success of urban growth for Tawa, not least the impacts on green spaces areas, and sporting facilities eg Grenada North Park.

#### **Environmental growth**

The planned improvements to Grenada North park, following on from the planned development in the 'Our Capital Spaces' plan last year are good to see.

Similarly that the skyline walkway development has been included in this plan. This is a long awaited and attractive link from the reserves and natural spaces in the north of Wellington, to the rest of the town belt and skyline walkway. This walkway will also allow a better integration of Wellington northern suburbs with the recreation opportunities proposed for the wider Spicer Forest / Colonial Knob Recreation area.

#### **Engagement**

When the Tawa Community are consulted, they show their interest and commitment to our Village, many residents sharing their opinions and suggestions with WCC.

I recommend that WCC conduct meaningful engagement with the Tawa Community during the development of this plan and early in 2015.

Should you have any questions or queries relating to this submission, please do not hesitate to contact me.

Robert Tredger

20 Greyfriars Crescent  
Tawa  
Wellington 5028  
04-232-5982  
021 181 4499  
tredger@slingshot.co.nz

# Wellington Urban Growth Plan Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

## Tell us what you think

We are keen to get your views on our draft Wellington Urban Growth Plan, which updates and will replace the existing transport and urban development strategies.

You can have your say:

- By making feedback on this form or in writing and sending it to us by:

### Post

Freepost

Wellington Urban Growth Plan (COP002)

Wellington City Council (CAB2)

PO Box 2199

Wellington 6140

- By making feedback online at [Wellington.govt.nz/urbangrowthplan](http://Wellington.govt.nz/urbangrowthplan)
- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

## Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

LORNA

Last name\*

WATSON

Street address\*

2 ROY ST TAWA

Phone/mobile

232 7235

Email

## Your feedback

I am making feedback

as an individual

on behalf of an organisation

Name of organisation

Feedback is required by 5pm on Monday 13 October 2014.

### Privacy statement

All feedback (including name and contact details) will be published and made available to elected members of the Council and the public. Personal information supplied will be used for the administration and reporting back to elected members of the Council and the public as part of the consultation process. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington. Submitters have the right to access and correct personal information.

Please provide your feedback here. Add extra pages if you need to.

I'm not in favour of medium density housing in Jawsa  
Also not in favour of the link road from Skelton's Valley to Jawsa

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

Free Post Authority Number 2199

Absolutely Positively  
Wellington City Council

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>>> GOT A QUESTION? Free 



FREEPOST  
Wellington Urban Growth Plan (COPO02)  
Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140



Item 3.1 Attachment 3

## Wellington Urban Growth Plan

1.

**First Name:**

Bruce

**Last Name:**

White

**Street Address:**

13 Sunrise Blvd

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

042324639

**Email:**

bruce.white@orcon.net.nz

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I would like to support the intention to enable/foster development in and around the Tawa Town Centre - AND along the corridor that runs along side the rail line. The improvements made to the commuter train service - and the development of the cycle way through the valley - have helped significantly in providing the 'spine' to support growth and development along that corridor (congratulations). It would be a great pity if the next steps to enable associated development that will enable more residents to reside within and along that corridor are not taken. That should include removal of barriers to change of, and more intensive, land use along the corridor. It is an area that provides a prime opportunity for good quality residential development (on the flat, and serviced by a now excellent commuter rail system, providing for access to the central city within 15 minutes).

Thank you.

## Wellington Urban Growth Plan

Response ID: 13 [View](#)

<b>First Name:</b> Brian
<b>Last Name:</b> Wilson
<b>Street Address:</b> 53A Oxford Street
<b>Suburb:</b> Tawa
<b>City:</b> Wellington
<b>Phone:</b> 042347085
<b>Email:</b> bwilson1@xtra.co.nz

**I am giving this submission:**

as an individual

**Organisation name:**

**Your comments on the draft plan:**

Tawa should not be subject to the imposition of 4 storied buildings.

Tawa is not an inner city suburb where you expect a denser population, but is a family oriented place to live where family sized houses need outside area.

It will also change the character and Tawa will lose its family style in favour of singles and couples.

High rise or infill housing will detract from Tawa's family orientation status.

High rise will detract from existing property with loss of view lines and sun.

**2. Thank you, Brian**

**Email Goes to Urban Growth Plan:**

Oct 07, 2014 23:34:27 Success: Email Sent to: growthplan@wcc.govt.nz

**Email Goes to Submitter:**

Oct 07, 2014 23:34:28 Success: Email Sent to: bwilson1@xtra.co.nz

# Wellington Urban Growth Plan

## Feedback form

Absolutely Positively  
Wellington City Council  
Me Heke Ki Pōneke

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- By sending an email to: [growthplan@wcc.govt.nz](mailto:growthplan@wcc.govt.nz)

Please phone 499 4444 for more information.

### Enter your name and contact details (\*mandatory fields)

Mr  Mrs  Ms  Miss  Dr

First name\*

Last name\*

Eve Marie Wilson

Street address\*

53A Oxford Street Tawa

Phone/mobile

Email

027 267 4412

[bwilson7@xtra.co.nz](mailto:bwilson7@xtra.co.nz)

### Your feedback

I am making feedback  as an individual  on behalf of an organisation

Name of organisation

**Feedback is required by 5pm on Monday 13 October 2014.**

### Privacy statement

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Please provide your feedback here. Add extra pages if you need to.

I am against the building of dwellings of up to four storeys in Tawa as it would take away family friendly village atmosphere Tawa has now and in time turn it into a ghetto. Also it would destroy the vista towards the Western Hills that dwellings in the village centre now enjoy.

Tawa residents have chosen to live here because of the low density housing. Those who like medium to high density housing choose to live in the city.

1st fold here - fasten here once folded

Thank you for your comments.

Please return this feedback form by 13 October 2014.

2nd fold here

Free Post Authority Number 2199

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke

CARRIED BY NEW ZEALAND POST 610-13

>>> GOT A QUESTION?

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10 OCT

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Wellington City Council (CAB2)  
PO Box 2199  
Wellington 6140

## Wellington Urban Growth Plan

1.

First Name:

Kathy

Last Name:

Wiltshire

Street Address:

24a Greyfriars Cres

Suburb:

Tawa

City:

Wellington

Phone:

Email:

kathy\_mark@xtra.co.nz

I am giving this submission:

as an individual

Your comments on the draft plan:

I am concerned about two aspects of the proposed Urban Growth Plan:

- 1 – the potential links between Siebings Valley and Tawa via suburban streets in Redwood; and
- 2 – the proposed medium density housing in central Tawa.

I do not believe that either of these proposals will impact Tawa in a positive manner.

In the past there has been a proposal to link Siebings Valley with Tawa via Greyfriars Crescent in Redwood. This proposal was strongly opposed by local residents at the time and put on the back burner. I am concerned that it may be re-introduced as part of the new Urban Growth Plan. Redwood has a high number of families with young children, a lot of whom walk to school, including primary, intermediate and college. With the growing rates of obesity in New Zealand, and the resulting health issues and cost to the country, I believe it is imperative to maintain and support environments that allow for exercise to be incorporated into daily life. Should local suburban roads that are designed for local traffic like Greyfriars Crescent, Onal Avenue, Redwood Avenue, Larsen Crescent etc, be utilised as a link to a new and growing subdivision there is a real increase in the risk to other users of the area specifically pedestrians and cyclists. The local roads in this area are narrow, windy and undulating with little visibility in places. This could result in a reduction in the number of children walking to school and a subsequent negative impact on obesity, health and well-being.

I am also concerned that medium density housing in central Tawa could impact on the unique culture and character of Tawa. A lot of people live in Tawa for the open space and natural environment it offers as opposed to the more inner city suburbs where housing density is higher. People choose to live here as it is a family focused suburb with good schools that work well both together and with the community to provide a supportive and positive environment for young and old. Introducing medium density housing could change the close community focused culture of Tawa to a more transient population where people are looking for cheap housing on the train line. Tawa already has a lot of affordable housing options to meet a variety of needs. Building dwellings of up to four levels in central Tawa will change both the look and the feel of the suburb and could put excessive pressure on the local schools, especially the college and intermediate. Pressure will also be put on things such as parking which is already difficult a lot of the time in central Tawa, as is making an appointment with a local doctor.

## Wellington Urban Growth Plan

1.

**First Name:**

Brian

**Last Name:**

Wolfman

**Street Address:**

12 Lincoln ave

**Suburb:**

Tawa

**City:**

Wellington

**Phone:**

**Email:**

bdwolfman@gmail.com

**I am giving this submission:**

as an individual

**Your comments on the draft plan:**

I support the sustainable urban growth initiatives as set out in this plan, and the changing of outdated planning policies that restrict medium to high density developments (ie. minimum parking requirements, vehicle storage requirements for new homes, etc). Being a resident of Tawa, I strongly support your proposed enhancements to the Tawa town centre and medium to high density homes in this area. It is time Tawa and other suburbs evolve from low density collections of takeaway shops, auto shops and big box stores into modern urban villages with terraced apartments, more choices for restaurants, retail shops and entertainment. My wife and I do not own a car, and would like to see more separated cycleways as a priority over on street parking on our main streets, particularly Main Road in Tawa. There is plenty of off street parking in the vicinity that we shouldn't be sacrificing cyclist safety so motorists can store their vehicles for free on public streets.

Furthermore I do not support the WCC endorsement of the RoNS motorway projects as they will bring more cars into our city and suburbs, including Tawa. These motorways/expressways will further encourage auto oriented housing developments, or 'sprawl' in Wellington City. This will increase the ease at which residents can travel by car and keep the region auto-dependent, which is not the goal of this urban growth plan. Subsequently public transport, walking and cycling will likely become less attractive as alternatives to driving, since there will be more traffic in our neighbourhoods (meaning slower bus travel times), poorer air quality, CO2 emissions and higher obesity rates. No other countries in the OECD are still investing so heavily in motorways as in New Zealand, because they are a 20th century solution to improving transport. Instead we should be improving the roads we have to make them safer and multimodal, as well as replacing road capacity with public transport capacity as a means to reduce congestion.