

***Summary of Submissions  
Proposed District  
Plan Change 56 -  
Managing Infill Housing Development***

# Proposed District Plan Change 56

## Managing Infill Housing Development

### Summary of Submissions

Submission Number	Name	Address for Service	Wishes to be heard
1	Joanne and Allan Backhouse	40 Cranwell Street Churton Park Wellington 6037	No
<p>Submitter supports tightening of the rules and agrees with the proposals in PC56. Of particular concern is that infill housing should not block sunshine or main view of adjoining neighbours. The submitters consider that infill housing in the outer suburbs should only be permitted if it is at least 2m from all boundaries and building in a style to blend with surrounding homes, is restricted to one storey (unless all other houses are two storey) and where land levels are raised, that solid retaining walls and adequate draining is required.</p> <p><b>Decision Requested:</b> To approve the plan change as proposed.</p>			
2	Hamish McIntyre	139 Khandallah Road Khandallah Wellington	No
<p>The submitter supports the Plan Change, in particular the open space provisions, requiring infill housing to be of a similar character to those in the immediate vicinity, and the imposition of a one storey height provision. The submitter cites concerns about poor quality development in his neighbourhood.</p> <p><b>Decision Requested:</b> That the plan change rules are supported, but in addition that the Council consider:</p> <ul style="list-style-type: none"> <li>including a real not nominal notification requirement (prior to the granting of any consents or amending any rating status) so that those adjacent property holders and others in the immediate vicinity have any opportunity to comment/object to the proposal; and</li> <li>Provide an opportunity for an appeal process on any infill consents granted before any work actually commences; and</li> <li>Where all the immediate adjoining neighbours do not agree, the infill housing proposal will not be granted Council consent to proceed.</li> </ul>			
3	Kerry Sagwell	51A Clifford Road Johnsonville Wellington	No
<p>The submitter is concerned about the way the proposed provisions (particularly the subdivision requirements) will affect the conversion of existing cross lease arrangements to fee simple titles. As such conversions are subdivisions the submitter would like provisions in the Plan to protect the rights of owners of cross lease properties who wish to convert these to fee simple titles. Existing dwellings on these sites already have Council approval and the plan change should not make it more onerous that it is presently to convert such cross lease titles.</p> <p><b>Decision Requested:</b> That the plan change include a specific exclusion from the proposed changes to prevent the changes having any unintended consequences for cross lease property owners who wish to convert to fee simple titles.</p>			
4 and 4a	The Eden Trust	PO Box 7193 Wellington South Atten: Robert Fagan	Unknown
<p>The submitter holds several concerns with proposed Plan Change 56 as it will give the Council more rules and regulations with which to unfairly burden those who have bought property with the intention of being able to build additional structures on it. The submitter supports the current rules in the Plan and states that if you want to change those rules then it should only apply to property purchased after the notification of the Plan Change. The submitter believes there are sufficient existing regulations, which if used properly, would stop many of the ugly examples of high density infill (eg. streetscape, height planes, 35% site</p>			

<p>coverage).</p> <p>The proposed new 50sq.metre open space is far too excessive for the needs of residents. Similarly limiting the height of a second dwelling to 4.5m is unrealistic as most of Wellington's sections are clopping in nature and excessive excavation can lead to bigger problems. One car park per unit is necessary and acceptable and asks that the Council actively assist residents to provide off-street parking (rather than providing disincentives eg. increased encroachment fees etc).</p> <p><b>Decision Requested:</b> Seeks that the Council stay with the current status quo and enforce existing rules and regulations properly.</p>			
5	Alistair Wilson	PO Box 10-905 Wellington	No
<p>Submitter supports the intent of the proposed rules, but argues that the process is flawed. That is, where the decision making is delegated with no right of recourse to an independent third party such as the Environment Court, it is unlikely that the quality of infill housing will be maintained over time. Developers will end up capturing the process with more incremental additions to the "permitted baseline" resulting in further adversely affected party exclusion and alienation from the process.</p> <p><b>Decision Requested:</b> That the Council approve Plan Change 56 with the following amendments:</p> <ul style="list-style-type: none"> <li>• Any proposed infill housing development that involves more than two units or a maximum of two storeys be subject to limited notification to directly adjoining properties unless effected party consent forms are held by the applicants from these parties; and</li> <li>• Notification to potentially adversely affected parties be required for any infill housing proposal where the development is: <ul style="list-style-type: none"> <li>○ 4 dwellings or more; or</li> <li>○ Three dwellings or more with more than two storeys.</li> </ul> </li> </ul>			
6	Aart Snoek	10 Alder Place Newlands Wellington 6037	No
<p>The submitter supports the restrictions proposed in Plan Change 56 as at the moment too many sections are subdivided and built on behind or in front of existing homes, spoiling character and atmosphere of the street and suburb. The submitter is also concerned that new subdivisions are created and \$500,000 homes erected with hardly any garden space in front or behind and with too limited distance between houses.</p> <p><b>Decision Requested:</b> That the council impose restrictions to homeowners, buildings, architects and developers so as to safeguard the traditional setups of a new or existing suburbs.</p>			
7	Peter Graham	18 Beazley Ave Paparangi Wellington 6037	No
<p>The submitter supports the whole Plan Change as he considers that the current provisions are far too liberal and do not give adequate protection for neighbours views, light etc. The new provisions will greatly improve the situation and provide a much fairer deal for neighbours.</p> <p><b>Decision Requested:</b> Approve the Proposed District Plan Change.</p>			
8	Arthur Udovenko	34 Taylor Tce Tawa Wellington	Unknown
<p>The submitter does not agree with the proposed subdivision rules for the following reasons:</p> <ul style="list-style-type: none"> <li>• The rules will mean an end to any subdivision in the greater Wellington area. The imposition of the 35% coverage and 4.5m height rules will mean nobody with an averaged sized section of 700sq.m will be able to build another house on it because the value of the second house will be outweighed by the costs of the subdivision/building project.</li> <li>• The 'protection of the character of Wellington City' is not a plausible rationale for the proposal because the inner city areas are already subdivided</li> <li>• Preventing subdivision and infilling of northern suburbs will not change the current image of the city.</li> </ul> <p>The proposal represents a cynical and unwarranted intrusion into property rights and its effect will only push house prices higher.</p> <p><b>Decision Requested:</b></p>			

That the Council notes the concerns of the submitter in making its decision, particularly in respect of the proposed changes to the subdivision provisions.			
9	Beatrice Hamer	4A Pomare Street Ngaio Wellington 6035	No
<p>The submitter makes a number of comments in relation to the proposed plan change:</p> <ul style="list-style-type: none"> <li>• Retaining walls already in place at time of subdivision consent need thorough inspection to be sure they are capable of supporting future development.</li> <li>• Aerial photographs need to be kept up-to-date to ensure the Council has current information about a site (eg. existing vegetation).</li> <li>• The change to require more green space is welcomed as the proliferation of two storied homes on small sections devoid of greenery has not enhanced suburban housing (Policy 4.2.3.1A). Similarly the need for greater hard surfacing areas for vehicle access and parking detracts from the quality of the streetscape.</li> <li>• Supports new text in paragraph 8 of objective 4.2.2 requiring new development to be consistent with the scale of dwellings in the residential environment. New architecture should be in sympathy with storey height, roof pitch and texture, cladding, window type and fencing.</li> <li>• Seeks clarification on what the policy is in regard to the preservation or replanting of mature exotic trees (refer to Policy 4.2.3.1C)?</li> <li>• Policy 4.2.3.1 (1<sup>st</sup> paragraph). Seeks that these provisions are strengthened to keep streetscapes from being changed, this is particularly important where groups of houses were built to a pattern even if they aren't in a designated historic area.</li> <li>• Policy 4.2.3.3. Seeks the imposition of aesthetic control over developers and architects in relation to tall solid fences, window and door size especially in areas of older or heritage housing stock.</li> <li>• Policy 4.2.4.1/Rule 5.3.4.12. Notes the overlooking adjacent properties might be mitigated by placing new dwellings obliquely or at an angle.</li> </ul> <p><b>Decision Requested:</b> That the Council notes the comments and suggestions of the submitter in making its decision.</p>			
10	Michael Fox	PO Box 13309 Johnsonville Wellington	Yes
<p>The submitter opposes the provisions especially the height limit and amount of open space required and the manner in which the plan change was implemented. The Submitter considers the plan change will stifle city growth, push land prices up, encourage urban sprawl and the proliferation of tiny single level dwellings. The plan change has wide ranging effect that has not been well thought out and cuts across citizens property rights.</p> <p><b>Decision Requested:</b> That the Council fully consult with not only residents that don't want change but industry and those that wish to live in areas affected to develop a reasonable approach.</p>			
11	William Field	52 Woodland Road Johnsonville Wellington	No
<p>The submitter makes a number of comments regarding infill housing and Council processes, as outlined in the decision requested. NB: photos supplied in support of this submission showing an infill development adjacent to the submitter's home.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• Requests the rules be amended so that every infill or subdivision is notified to immediate neighbours. The submitter is concerned that landowners spend significant time and money getting their properties the way they like them and yet the Council gives developers the right to ruin their living standards.</li> <li>• Seeks that privacy is protected at all costs as it is something most Kiwis hold very personal.</li> <li>• Seeks that developers be required to consider more off-street parking as one park per house is usually not enough for the number of cars per household, putting a strain on streets that are already at capacity.</li> <li>• Seeks that new houses in established neighbourhoods have to conform with the rest of the street.</li> <li>• Likewise, developers must not inconvenience neighbours during construction.</li> <li>• Seeks that an independent ombudsman is appointed over Councils as residential ratepayers have no where to go to have their concerns heard.</li> </ul>			
12	Ngaio Progressive Association	199a Cockayne Road Ngaio	No

		Wellington Atten: Julia Williams	
<p>The submitter supports the plan change in its entirety as it is concerned at the inevitable cumulative effects of infill development on the amenity and character of Ngaio. The submitter has particular concerns about the height of recent new (and proposed) infill development. In the hilly suburb it allows designers to excavate and create structures up to 4 stories high, completely out of scale with the residential context. The Submitter approves the restriction of a second dwelling to 4.5m and states that they understand the new rules will limit the use of excavation that allows developers to build high and meet the height planes. Approval is also given for the desire to minimise hard paved areas and promote on-site drainage.</p> <p>Approval is given to section 3.2.3.8 (requirements for a site development plan – subdivision), Policies 4.2.2.1A and 4.2.2.1B and the Residential and Subdivision Design Guides. Approval is given to Policies 4.2.3.1.A – 4.2.3.1.C, 4.2.33, 4.2.4.1A and rules 5.1.1.2, 5.1.3.2, 5.1.3.2B, 5.1.3.4.3, 5.3.1.6, 5.3.1.11, 5.3.3.3, 5.4.5.2A, 5.4.5.2B.</p> <p>Concerns were also raised at the number of infill developments that have proceeded without notification.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• Adopt the plan change in its entirety.</li> <li>• Clarify how the Residential and Subdivision Design Guides will be used, ie what is their status in respect of the Plan objectives and rules?</li> <li>• Consider widening the scope of notification of infill developments to ensure affected owners have some input into the consent process.</li> </ul>			
13	Janice Lowe	54 Izard Road Khandallah Wellington 6035	No
<p>The submitter opposes the provision to reduce the permitted height of a second unit to 4.5m. The submitter believes that Wellington's topography plus the smallish size of many infill sites would make development of those sites impractical if a 4.5m height is imposed. The submitter notes that most dwellings in Wellington are not single storey and is concerned that the proposal will encourage urban sprawl and a consequential increase in motor use.</p> <p><b>Decision Requested:</b> That the Council amend the proposal to restore the current rules on permitted heights and remove the 4.5m restriction.</p>			
14	Dale McTavish	59 Owen Street Newtown Wellington 6021	No
<p>The submitter supports tighter controls on subdivision as well as the design guide, the reduction of the permitted height for the second unit on a site and the open space requirements. The submitter does not however support the visitor car parking requirement if it entails removing the front fence as street level to provide a car pad for 3-4 vehicles as this would create visual pollution and be hazardous to pedestrians. Support for the visitor car parking requirements is only provided if the parking is provided at the rear of a site.</p> <p><b>Decision Requested:</b> The submitter seeks:</p> <ul style="list-style-type: none"> <li>• Tighter controls on subdivisions and the design guide</li> <li>• Open space requirement for the Inner (35sq.m) and Outer Residential Areas (50 sq.m)</li> <li>• Reduce the permitted height of 2<sup>nd</sup> unit on a site to 4.5m.</li> <li>• Requirements for the provision of visitor parking if it is discrete. It should not be allowed inappropriately in character suburbs.</li> </ul>			
15	Greater Wellington Regional Council	PO Box 11646 Wellington 6142 Atten: Ling Phang	Yes
<p>The submitter supports the Plan Change, particularly the new residential policies, as they relate well to Policy 8 of the Regional Policy Statement (RPS) which identifies good urban design and protection of amenity values as key elements in achieving environmental quality in urban areas.</p> <p>The open space provisions are consistent with Policy 8 (1) and (2) of the RPS and are supported as a result. The height restriction for 2<sup>nd</sup> units on a site is consistent with Policy 8(2) of the RPS. The submitter supports the stronger policy approach to encourage the retention of mature trees and bush and minimises hard surfaces as these are also consistent with Policy 8 (1) and (2) of the RPS. The submitter supports the use of the Residential and Subdivision Design Guides (in particular the new section on Individual Lot Design) to manage the effects of infill housing. In respect of the Subdivision Design Guide, the guidance to incorporate on-site water quality treatments measures is also supported.</p>			

<b>Decision Requested:</b> That the Council adopt Plan Change 56.			
16	Barbara Woods	4 Luckie Street Tawa Wellington	No
The submitter cites concerns relating to an infill development adjacent to theirs and notes that infill housing should not be substandard and should be single storey houses or units which do not obstruct the sun from existing properties.			
<b>Decision Requested:</b> That infill housing should be single storey houses or units.			
17	Newlands Paparangi Progressive Association	6 Bancroft Tce Newlands Wellington Atten: Jim Candiliotis	Unknown
The submitter supports the general thrust of the policy in regards to infill housing.			
<b>Decision Requested:</b> That the Council notes the comments of the submitter in making its decision.			
18	Ken Mulholland	7 Ashleigh Crescent Miramar Wellington	Unknown
The submitter fully supports limiting the height of the second unit to single storey, introducing open space requirements for each dwelling, tightening subdivision controls and introducing requirements for visitor car parking. The submitter cites two examples of developments in his neighbourhood to support his submission.			
<b>Decision Requested:</b>			
<ul style="list-style-type: none"> <li>• That the Council introduce robust and sensible rules for infill housing and maintain those standards by not giving dispensations without proper consultation with affected neighbours. The Submitter seeks that such dispensations be given by council committees and not Council officers.</li> <li>• All infill housing is in keeping with the character of surrounding homes and of a similar height</li> <li>• Adequate open space provide to allow for lawns and gardens</li> <li>• Views and sunlight enjoyed by neighbours should be preserved</li> <li>• Adequate separation between buildings and also from boundary fences to avoid shading and dampness.</li> </ul>			
19	Diana O`Neill	430 Evans Bay Parade Hataitai Wellington	No
The submitter supports improving the quality of urban design but seeks that the Council Urban Designers also provide input into the design of one or two unit developments in addition to the current three or more units on a site. The submitter suggests amendments to the 4.5m height rule for second units on a site stating that consideration needs to be given to topography where a single dwelling may not be practical from a design perspective or meet the demand created by the changing demographics or unique characteristics of Wellington.			
<b>Decision Requested:</b> Recognition that "one size does not fit all" in Wellington City because of the compact nature of the geographical area and the unique features that are characteristic of our housing. Decisions about infill housing in the future should recognise topographic differences within the city.			
20	Mr and Mrs Watson	127 Heke Street Ngaio Wellington	No
The submitter welcomes the changes to the Council policy on infill, particularly the changes that strengthen the case for infill housing to be tempered. The submitter particularly supports limits to development opportunities and preventing change to the character of an area (this is not just style and architectural, but also social, community, amenity, wellbeing, security and safety). The submitter's major concern is that infill has been permitted that is too close to other houses, it has allowed housing density and building quality that will lead to substandard living conditions in the future. The density also affects roading infrastructure and parking space that was not designed for more intensive use.			

<b>Decision Requested:</b> That the Council adopt the new changes that will allow more room for consideration of the above factors when planning permission is given for infill housing.			
21	Philippa Boardman	64 Quebec Street Kingston Wellington 6021	No
<p>The submitter agrees with the main pointers of the Plan Change to improve the quality of infill housing but does note one particular reservation regarding the open space requirement. One concern is that the open space requirement is not justified or will be feasible for all proposed new dwellings in Wellington, given the size of sections in Wellington and also Wellington's climate. However the submitter does state that buildings should not be built too close to each other either so believes boundary restrictions are necessary.</p> <p>The submitter would like height restrictions on new dwellings especially where they could block sun and views to existing neighbours and the submitter supports greater discretion in the subdivision process to ensure better quality outcomes.</p> <p>The submitter also adds a concern about the height of trees, which can become unsafe and block sun and views to other residents and requests there be a solution implemented for trees, as well and buildings.</p> <p><b>Decision Requested:</b> That the Council notes the comments/concerns and suggestions of the submitter in making its decision.</p>			
22	George Ridd	9C Vera Street Karori Wellington	No
<p>The submitter supports the open space requirement as this will assist in protecting the amenity of residential areas by ensuring dwellings are not crammed in and will provide a sense of space.</p> <p>The submitter also supports the proposed rule to limit the height of a second unit on a site, stating this is especially important because of Wellington's topography. The submitter accepts that property purchases accept the effects of existing dwellings that may overlook a property, but suggests that the construction of new double storey infill dwellings can adversely affect properties (eg. privacy, visual dominance and shading). Neighbours need to have the opportunity to raise their concerns regarding new dwellings greater than 4.5m in height.</p> <p>The submitter supports the proposed visitor car parking requirement as street parking is already at a premium in many parts of the city and infill development puts a further strain on this.</p> <p>The submitter also seeks that this plan change deals with concerns over the application of the Sunlight Access Plane rule, even though it is not presently subject to change in Plan Change 56. The submitter demonstrates a particular concern that the current sunlight access plane rules can allow for a situation of a 8metre high corner of a dwelling within 1m of the boundary (facilitated by a right of way adjoining the site). The submitter uses several diagrams to explain the effects that development under that rule can have on adjoining property owners and argues that this situation will become more common as more infill development (with associated right of ways) occurs.</p> <p><b>Decision Requested:</b> The submitter supports all changes currently proposed and would like these to remain. The submitter would also like the Council to include a rule which addresses the sunlight access plane issue discussed by the submitter.</p>			
23	Wellington City Council	PO Box 2199 Wellington	No
<p>The submitter notes that there are a number of issues that have come to light since the Plan was notified that require further clarification. These are mostly minor matters, and as such, may not be picked up by other submitters on the Plan Change.</p> <p><b>Decision Requested:</b> That the Council adopts the following changes:</p> <ul style="list-style-type: none"> <li>• Rule 5.1.1.2 Visitor car parking requirement: Three changes required. One to include developments processed under rule 5.2.4 and one to amend the statement below the rule which clarifies how many spaces are required depending on the number of units provided. The third change is to provide an assessment criterion for failure to provide required visitor parking. Wording suggestions provided.</li> <li>• Site Area Definition and access ways: A refinement to the rule which removes areas used for permanent access from the calculation of site area for unit title, cross lease and company lease subdivisions. This provision should equally apply to situations where only a land use consent is sought in relation to a multi-unit development. Wording suggestions provided.</li> <li>• Definition of 'Access Strip': this revised definition continues to cause confusion due to the double negative used in the second part of the definition. Revised wording is suggested to clarify this.</li> <li>• Residential Design Guide reference: a consequential change to remove the reference to the Multi-Unit Design Guide in</li> </ul>			

<p>rule 7.3.5 (Suburban Centre multi-unit development) needs to be updated to refer to the Residential Design Guide.</p> <ul style="list-style-type: none"> <li>• Link between subdivision and Residential Design Guide: It is recognised that to require at the time of subdivision consents a complete assessment of the work against the Residential Design Guide is excessive. It is suggested that the reference to the Residential Design Guide in section 5.3.14.13 be amended so that it refers to "Section 1 of the residential Design Guide (ie. Building form, location and site planning)".</li> <li>• Open Space Provisions: early implementation of these provisions has revealed a need for the planners to have greater flexibility in dealing with waivers of the open space requirement. It is proposed that Policy 4.2.3.1A and the assessment criteria in Rule 5.3.3 be amended to provide greater discretion. Such discretion would be expanded to cover the situation where the application has been fully assessed against the Residential Design Guide by the Council's urban designers and the proposal receives a very favourable urban design assessment, ie. an excellent design concept for the development along with high quality private open spaces (though less than what the rule requires) can still meet the intent of the policy. Two other minor wording changes to the rule are also proposed for further clarity.</li> <li>• Existing uses permitted activity rule: Clarification is required to explain what happens to applications that do not meet the permitted activity standards for this rule. A margin note is suggested to clarify the process.</li> <li>• Correction: correct an incorrect reference to 5.1.4.3.4 found in rule 5.3.3.3 so that it reads 5.1.3.4.3.</li> </ul>			
24	Penelope Lawrence	111c Apu Crescent Lyll Bay Wellington 6022	No
<p>The submitter seeks amendments in relation to rule 5.3.14.8 regarding the need for greater consideration of storm water capacity to cope with additional infill housing. The submitter cites specific concerns about such an issue relating to houses in Apu Street.</p> <p><b>Decision Requested:</b> That the following specific concerns are added to Plan Change 56:</p> <ul style="list-style-type: none"> <li>• That appropriate stormwater drainage has sufficient cubic capacity to service additional apartments or flats added to an original one home property.</li> <li>• If it does not, that an appropriate secondary flow path is reserved.</li> <li>• That all new apartments or flats added have a water toby with access for the Council on nearby Council land (for accurate water metering charges if they occur).</li> </ul>			
25	David and Ethel Burson	77 Cockayne Road Khandallah Wellington 6035	No
<p>The submitter supports the generalised intentions of the Plan Change. The submitter cites the example of a development in Agra Crescent, Khandallah as being totally out of character with nearby residential properties (three buildings on the site, each being three storeys high). Consequently it is submitted that the current standards need to be significantly tighten to preclude such massive and out of character future developments.</p> <p><b>Decision Requested:</b> That approval should not be given for infill housing developments that exceed two storeys or for any more that three detached townhouses. An exemption to these rules could be considered based on it being suitable for the locality, be suitable for the local character and there should be a requirement for all adjoining property owners to give their written approval.</p>			
26	Sunita Hunt Gavin Dench	142 Sutherland Road Melrose Wellington	Unknown
<p>The submitter does not oppose infill housing per se, but states that we need to keep in mind that Wellington's capacity to allow infill housing is finite unless we chose to reduce our quality of life.</p> <p><b>Decision Requested:</b> That criteria be developed that assess individual applications as well as reserving streets and suburbs from such development that alters its character and reduces quality of life and environment for occupants. Suggestions for criteria include:</p> <ul style="list-style-type: none"> <li>• Sufficient space for each infill unit, which would also allow space for trees and other screening to create privacy</li> <li>• The practice of walls being thrown up directly outside windows must not be allowed. Regards must be given to quality of life, light and views available to all.</li> <li>• Parking difficulties as more residents means more cars.</li> <li>• Building a 'granny flat' should be encouraged.</li> <li>• Areas and buildings with historical values and architecture need to be protected from such changes.</li> <li>• Views are not ours by right, "this needs to be amended to protected everyone and our living environment".</li> </ul>			

27	A. Heather Sharpes B. Margaret Graham	Submitter A: 73 Creswick Terrace Northland Wellington	Submitter B: 71 Creswick Terrace Northland Wellington	Yes
<p>The submitters support the proposals to limit the height and site coverage of developments in residential areas. The submitters cite an infill development adjacent to their homes as being the reason for a supportive submission. "The size of these townhouses, crammed on to a small area of land is intrusive and intimidating". Other effects noted by the submitters include loss of privacy and sunlight, most vegetation cleared from the site and replaced with concrete or buildings and a significant increase in traffic.</p> <p><b>Decision Requested:</b> That the Council stop people being able to develop sites in this way without the consent or discussion with those who will be affected by the developments. We want the Council to limit the height and site coverage of buildings in residential areas (without consent) and to restrict the amount of vegetation that can be removed from the site.</p>				
28	Brooklyn Residents' Association	PO Box 6332 Marion Square Wellington Atten: John Macalister		No
<p>The submitter notes:</p> <ul style="list-style-type: none"> <li>• that infill housing should be sympathetic to the character of existing and surrounding homes</li> <li>• that there should be protection of existing vegetation, particularly mature trees (support 4.2.3.1C and 5.1.3.2B)</li> <li>• that new houses should be well insulated and not pose a safety risk to existing houses.</li> <li>• They support the new open space requirement and believe that residents who require no open space have the option of apartment dwellings.</li> <li>• That people should have a choice of housing and lifestyle, however they believe that choice may be limited through infill housing. More data analysis of future society trends needs to be carried out.</li> </ul> <p><b>Decision Requested:</b> That the Council notes the comments/concerns and suggestions of the submitter in making its decision.</p>				
29	Housing New Zealand Corporation (HNZC)	c/- Tonkin and Taylor Ltd PO Box 2083 Wellington Atten: Nathan Baker		Yes
<p>The submitter generally supports the intent of the Plan Change but is concerned it will reduce the potential for sites and create additional uncertainty for potential housing developments and does not provide or promote infill development in appropriate areas. A number of further specific submissions are noted.</p> <p><b>Decision Requested:</b> Specific submissions seek the following:</p> <ul style="list-style-type: none"> <li>• Policy 4.2.2.1A: "unduly restrictive". Delete the word 'consistent' from the policy and include further explanatory text to clarify when intensification of housing density might be appropriate.</li> <li>• Policy 4.2.2.1B: supports this policy so seeks its retention.</li> <li>• Policy 4.2.3.1A and Rule 5.1.3.2B: use advocacy only regarding open space policy. Amend wording of the policy (draft wording supplied) and delete open space rule.</li> <li>• 4.2.3.1B: generally supports hard surfacing policy, but seeks clarification that well designed hard surfaced outdoor living areas are appropriate.</li> <li>• Policy 4.3.2.1C: supports tree and bush retention policy so seeks its retention.</li> <li>• Rule 5.1.1.2: remove visitor parking rule as its inclusion not justified by s32 report.</li> <li>• Rule 5.1.3.4.3: remove this rule (height of second unit) and make any consequential changes. Consider its wider implications as part of Targeted Approach to Infill. If the rule remains add additional assessment criteria regarding the ability of the proposal to meet Wellington's housing needs.</li> <li>• Rule 5.1.3A: Supports rule so seeks its retention.</li> <li>• Rule 5.3.4: add additional assessment criteria regarding the ability of the proposal to meet Wellington's housing needs.</li> </ul>				
30	Ted Lines	26 Tyne Street Island Bay Wellington		No
<p>The submitter strongly supports the reduction of the bulk and scale of infill housing and the open space requirement given experiences of infill housing in their local neighbourhood.</p>				

<p><b>Decision Requested:</b> That the Council note the submitters concerns about infill housing and the lack of concern for current property owners.</p>			
31	Richard and Tania Devereux	218 Evans Bay Parade Wellington	Unknown
<p>The submitter does recognise that changes need to be made on this issue, but notes concerns with the height of the second unit rule, the open space requirement and the Residential Design Guide (which is extremely prescriptive).</p> <p><b>Decision Requested:</b> That the Council note the concerns of the submitter.</p>			
32	John Bryce	Akatarawa Road RD 2 Upper Hutt	Yes
<p>The submitter opposes the proposed bulk and location rules (in particular rule 5.1.3.4.3) as it will mean fewer developments will fit within the rules.</p> <p><b>Decision Requested:</b> That the rules state an order of preference (ie is sunlight more important than privacy). Environment is more important than aesthetics. It should not be possible to override the environment by making the project look nice.</p>			
33	John MacLachlan Dimitria Vounatsos	15 Strathavon Road Miramar Wellington 6022	No
<p>The submitters strongly support PC56 in order that the dramatic impacts of infill housing be dealt with before the character of older suburbs is ruined. The submitters cite numerous examples of infill developments (both good and bad) in Miramar.</p> <p><b>Decision Requested:</b> That the Council approve PC 56 for inclusion in the District Plan, but specifically notes the following points:</p> <ul style="list-style-type: none"> <li>• Definition of 'site': should be reviewed as it may enable intense development on small parts of original sites.</li> <li>• 3.2.2 (subdivision consent information requirements): changes are supported, but doubts the value that having "common furniture items drawn to scale" will have in considering neighbourhood effects.</li> <li>• 3.10 Definitions: changes are supported to give greater clarity</li> <li>• Section 4.1: supported.</li> <li>• Policies 4.2.2: supported as this is the heart of the infill problem. Suburbs or areas within them should have their character defined for certainty and guidance.</li> <li>• Objective 4.2.3: supported except that it risks generalising outer residential as "more diverse".</li> <li>• Policy 4.2.3.1.A (open space): is too imprecise, provide greater specificity about the nature of those effects. The explanatory text is supported.</li> <li>• Policy 4.2.3.1.C (retention of trees and bush): is supported to retain openness.</li> <li>• Policy 4.2.3.3: revised explanatory text supported as a generalised but generally accurate description.</li> <li>• Objective 4.2.4 (subdivisions): changes are supported, especially the paragraph that discusses the height of second dwellings and the triggers for it.</li> <li>• Rule 5.1.1.2 (visitor parking): how will the provision be monitored and enforced?</li> <li>• Rule 5.1.3.2B (open space): supported, but how will this be monitored?</li> <li>• 5.1.3.4.3 (height of 2<sup>nd</sup> unit) and associated rule (5.3.4b): strongly supported.</li> <li>• 5.3.3.11-12: supported for the greater clarity provided.</li> <li>• 5.3.4.6 and 5.3.4.7: also strongly supported.</li> </ul>			
34	Jonathan Black	PO Box 7121 Wellington South	Unknown
<p>The submitter is encouraged by the plan change, even though as a developer of some infill housing, he realises it may make further development more difficult. The submitter queries the design assessment process.</p> <p><b>Decision Requested:</b> Consider the adoption of a 'design police team', where proposed buildings go before a group of architects for sign-off or to make recommendations. Whilst not a perfect solution, it may produce better results than we are getting now.</p>			
35	Deborah Olson	3 Quetta Street Ngaio	Yes

		Wellington	
<p>The submitter supports the intentions of the Plan Change but would like to see a further change in regard to ground levels, ie that new buildings should not be allowed to be higher through the excavation of the ground. Other provisions supported include rule 5.1.3.4.3 (height of 2<sup>nd</sup> unit), rule 5.3.14 (subdivision assessed against the residential design guide); the notification statement of all multi-unit resource consent applications. The residential design guide is also supported as it restores its effectiveness in deciding the appropriate size and character of multiunit developments.</p> <p><b>Decision Requested:</b> That the Council note the areas of support by the submitter and that building heights should be measured from the level of the finished excavation.</p>			
36	Trelissick Park Group	24 Orari Street Wellington 6035	No
<p>The submitter supports PC 56, in particular the objective to limit the number of houses per site, rule 5.1.3.4.3 (height of 2<sup>nd</sup> unit), Policy 4.2.3.1A and rule 5.1.3.2B (open space); policy 4.2.3.1B (hard surfaces). The submitter also seeks some amendments to further neutralise the effect of development on stormwater, suggesting a number of methods that could be referred to in the Plan. The Submitters support policy 4.2.3.1C (retention of trees and bush) but consider it needs to be stronger than just "encourage".</p> <p><b>Decision Requested:</b> To make the suggested change to DP 56 and note our comments where appropriate regarding neutralising stormwater effects and a suitable cross reference to WCC's Indigenous Biodiversity Plan.</p>			
37			Unknown
<p>The submitter supports PC 56, in particular rules 5.1.3.4.3 (height of second unit) and 5.1.3.2B (open space). This support stems from concern that an adjoining property may be developed which will create privacy issues.</p> <p><b>Decision Requested:</b> To note the support of this submitter for provisions 5.1.3.4.3 and 5.1.3.2B.</p>			
38	Spencer Holmes Ltd	PO Box 588 Wellington Atten: Ian Leary	Yes
<p>The submitter outlines a number of significant concerns with the plan change including:</p> <ul style="list-style-type: none"> <li>• the lack of a definition for infill development,</li> <li>• rule 5.1.3A: existing use rights provision,</li> <li>• rule 5.1.3.2B: open space,</li> <li>• rule 5.1.3.4.3: height of a second unit and the associate concerns of written approvals of neighbours,</li> <li>• the Residential Design Guide,</li> <li>• assessment criterion 5.3.10.11: regarding the removal of trees,</li> <li>• landscaping requirements, and</li> <li>• rule 5.4.5 and specifically 5.4.5.2B subdivision.</li> </ul> <p><b>Decision Requested:</b> The submitter seeks the abandonment of PC 56 on that basis that it is poorly conceived and contains unworkable provisions. In particular:</p> <ul style="list-style-type: none"> <li>• Rule 5.1.3.4.3: The 4.5m height restriction is onerous and cannot be justified at all in any of Wellington' numerous hilly suburbs. If adopted, it should only apply to the flat suburbs with predominantly single storey dwellings, not the whole city.</li> <li>• Rule 5.1.3.2B: requirement to remove parking or manoeuvring areas from open space limits permissible density of development beyond the permitted site coverage rule and should not be adopted.</li> <li>• Residential Design Guide: should be amended to recognise that it is ultra vires to control activity on a site where that activity does not have an effect on the properties outside the site or where neighbours have given written approval.</li> <li>• Landscaping requirements: should only be applied where specific measures of mitigation are required. Assessment criterion 5.3.10.11 should be deleted as it is unworkable.</li> <li>• Section 3.2.3.9: delete first bullet point as it is superfluous and potentially misleading.</li> <li>• Assessment Criterion 5.4.5.2B: delete as it is unworkable.</li> </ul>			
39	New Zealand Institute of Architects - Wellington Branch	c/- PO Box 9933 Wellington Atten: John Mills	Unknown
<p>The submitter supports the intentions of the Plan Change, but notes some issues that require further modification. These include</p>			

<p>the new permitted activity rule for existing uses (5.1.3A) and rule 5.1.3.4.3 (height of second unit) especially in respect of building on hillsides. Concerns about the requirement in the Residential Design Guide for open space areas to be flat also presents problems for hilly sites.</p> <p><b>Decision Requested:</b> That:</p> <ul style="list-style-type: none"> <li>For rule 5.1.3A: allow the status quo to apply to existing non-complying buildings, and that additions and alterations to those buildings to be 'permitted activities' provided that the work does not worsen the non-compliance and preferably reduces the level of non-compliance.</li> <li>For Rule 5.1.3.4.3: the rules should allow some flexibility or be modified to better address the situation on hillside sites. It would help if the rule, rather than limiting developments to a maximum height of 4.5m, limited buildings to single storey with a maximum height above floor level of, say 4m.</li> </ul>			
40	RJ Walker	78 Hawker Street Mount Victoria Wellington	Unknown
<p>The submitter is particularly concerned about infill housing proposals in heritage areas and areas where provisions for view shafts are assigned, citing an example of poor infill housing in Hawker Street. The submitter cites a number of other suburbs in Wellington City where there is plenty of scope for infill housing.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>That infill housing is opposed in heritage listed and view shaft listed areas.</li> <li>That infill housing is supported in outer areas (eg. Kilbirnie, Miramar, Lyall Bay, Mount Cook, Strathmore and similar suburbs).</li> </ul>			
41	S Walker	78A Hawker Street Mount Victoria Wellington	Unknown
<p>The submitter is particularly concerned about infill housing proposals in heritage areas and areas where provisions for view shafts are assigned, citing an example of poor infill housing in Hawker Street. The submitter cites a number of other suburbs in Wellington City where there is plenty of scope for infill housing.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>That infill housing is opposed in heritage listed and view shaft listed areas.</li> <li>That infill housing is supported in outer areas (eg. Kilbirnie, Miramar, Lyall Bay, Mount Cook, Strathmore and similar suburbs).</li> </ul>			
42	Helen McAra	c/- Wellington City Council PO Box 2199 Wellington	Unknown
<p>The submitter considers the Council is taking a wrong step with the proposed new subdivision rules. The rules should be softer not more difficult. Concerned that the new rules do not make construction cost effective, especially when height of infill houses reduced to single storey. Concerned this will force people further and further away from Wellington and in turn putting pressure on transport infrastructure.</p> <p><b>Decision Requested:</b> That the committee note the concerns of the submitter and make the subdivision rules more lenient (eg. site coverage 50%)</p>			
43	Tawa Community Board	c/- 4a Rewa Tce Tawa Wellington Atten: Ngaire Best	Yes
<p>The submitter supports the plan change but believes that minimum lot sizes should be reintroduced due to the current rule based planning not meeting the expectation of providing a high standard of infill development. Rule 5.3.3, 5.4.5, policy 4.2.4.1 and the amended design guide for subdivision are acknowledged, but concern remains that without a concrete minimum lot size the status quo will continue. Residential amenity policy 4.2.2.1A and B and the residential design guide are supported, as is rule 5.1.3.4.3 (height of second unit). Support for open space, hard surfacing and retention of trees and bush (4.2.3.1A – 4.2.3.1C) are supported but are concerned about long term compliance and monitoring of such consent conditions.</p> <p><b>Decision Requested:</b> That:</p>			

<ul style="list-style-type: none"> <li>• Minimum lot size be reintroduced</li> <li>• Breaching of the 4.5m height rule for infill housing should be subject to limited notification.</li> <li>• Commissioners recognise the long term compliance and monitoring of consent conditions (around landscaping, hard surfacing, open space etc) as an issue in their recommendations to Council and request that adequate funding be allocated for this and that the monitoring element be recognised in the fees and charges for new infill developments.</li> </ul>			
44	Mount Victoria Residents Association Inc	12/17 Brougham Street Mount Victoria Wellington	Yes
<p>The submitter supports the intent of the plan change and has made submissions on every element of the Plan Change, offering full support, qualified support or opposition. Specifically, suggestions for amendments or clarification are noted for the following areas of the Plan Change: General provisions, Definitions, Objectives (and associated Policies) 4.2.1, 4.2.2, 4.2.3, 4.2.4, rules 5.1.1.2 (vehicle parking), 5.1.3.2B (open space), 5.1.3A (existing use rule), 5.3.1 and 5.3.3 (residential buildings), 5.3.4 (including the wording of the non-notification statement and the standard and terms), 5.3.14 (subdivision).</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• That the matters covered in the submission are considered by the Committee.</li> <li>• Also, that no further infill housing be allowed in Mt Victoria or any other of the older suburbs.</li> <li>• That greater attention be given to ensuring that this plan change be written in plan language eliminating unfamiliar words and phrases that could obscure the intentions of the rule.</li> </ul>			
45	Gill Hope	16 Monteith Grove Brooklyn Wellington	No
<p>The submitter has concerns about the quality of infill housing and seeks that only housing that blends with the area be allowed.</p> <p><b>Decision Requested:</b> The submitter requests that:</p> <ul style="list-style-type: none"> <li>• the Council not allow developers to degrade areas of Wellington with bulky housing unsuitable for the area and blocking neighbours views and sun.</li> <li>• that developers not use materials that rust and corrode only 6 months after completion</li> <li>• encourage more environmentally designed or converted buildings and/or additions to buildings in the Wellington area.</li> </ul>			
46	James Saunders	54c Hungerford Road Melrose Wellington	No
<p>The submitter opposes the open space requirement (5.1.3.2.B) and instead suggests a density limit of dwellings per site area. Rule 5.1.3.4.3 (height of second unit) is also opposed due to the many steep sites making the rule restrictive.</p> <p><b>Decision Requested:</b> That the Committee consider the elements of opposition and introduce a density limit of dwellings per site area.</p>			
47	The Architecture Centre Inc.	PO Box 24178 Wellington	Unknown
<p>The submitter supports the plan change due to it aim to increase the quality of infill and multi-unit housing developments. Support is provided for subdivision being a discretionary activity (5.3.14), the height limit for second units (rule 5.1.3.4.3), provisions that seek the retention of mature trees and the open space requirements (rule 5.1.3.2B, with some amendments). A number of amendments or clarifications are sought to various aspects of the Residential Design Guide (specifically page 3, G1.11, G1.14, G3.8, G2.2, G3.10, G2.3, G3.1, G3.2, G1.7, G1.12, G3.16, G2.9) and the Subdivision Design Guide (G6.7, G6.5, G6.10). Amendments are also sought to rule 5.1.3A (existing uses).</p> <p><b>Decision Requested:</b> That the Committee note the support and address the amendments sought above.</p>			
48	Virgil Kan	26 Nalanda Cr Broadmeadows Wellington	Unknown
<p>The submitter makes comments on the reasonableness of rule 5.1.3.4.3 (height of second unit) and the minimum width requirement of the open space areas (5.1.3.2B).</p> <p><b>Decision Requested:</b></p>			

		<ul style="list-style-type: none"> <li>That a proposed reduction of 2.6m from the existing 8m height limit to 5.4m would effectively reduce the height limit by one storey, while still making it more workable than the proposed 4.5m on sloping sites.</li> <li>That the minimum width of the outdoor area in Outer Residential Areas be reduced to 3m to allow greater flexibility in the placement of infill housing.</li> </ul>	
49	Wellington City Labour Local Government Committee	10 Torridon Road Miramar Wellington 6022 Atten: Robin Boldarin	Yes
<p>The submitter is pleased that the proposed changes dovetail with many of the concerns felt by the Committee over the seemingly uncontrolled development of infill housing.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>Can the Council's planning include sunshine hours as well as sunlight access to housing units.</li> </ul>			
50	Frances Robinson Architects	15 Talavera Tce Lambton Wellington 6012	Yes
<p>The submitter supports plan change 56 as a positive step towards improving the quality of infill housing. However the submitter has particular concerns with proposed new rule 5.1.3A (existing uses permitted activity standard), particularly that it does not make provision for sites that exceed site coverage to be within the scope of the rule.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>That rule 5.1.3A be amended to allow site coverage (5.1.3.3) to be considered within the scope of the rule, alongside yards, maximum height and sunlight access.</li> </ul>			
51	Denis Fortune	Bulleyment Fortune Architects PO Box 6120 Wellington	No
<p>The submitter is generally in favour of the changes though, as a result, suspects the site coverage will be reduced to 28% and that three levels will become the norm. The submitters also note their belief that the plan change has nothing to do with the quality of housing, rather it is more about amenity. Comments are also noted regarding the need for consistent and competent advice during the urban design consultation phase.</p> <p><b>Decision Requested:</b> That the Committee consider:</p> <ul style="list-style-type: none"> <li>A third residential zone be introduced along main arterial routes suitable for multi-unit development.</li> <li>That the provision requiring furniture items to be drawn to scale on plans stems from concerns about room size. Reintroduce the old NZS 1900 Chp 3 on minimum room sizes, or something suitable to our age.</li> <li>Rule 5.1.1.2: the visitor parking standard is too harsh. One in six would be more appropriate.</li> <li>Rule 5.1.3.2B: request 40m<sup>2</sup> for outer residential areas and 30m<sup>2</sup> for inner residential areas, both of good design is more than sufficient for multi-unit developments. Do not prescribe that the open space area must be lawn as lawn can become unusable in winter. In respect of 5.1.3.2B.7, why can't buildings be included in this?</li> <li>Policy 4.2.3C (retention of trees): needs more work as mature trees cause problems too around shading and leaf drainage disruption. Also, landscaping plans are all that are needed rather than trying to prevent the removal of trees prior to development.</li> <li>How will the Council administer the greatly increased workload that PC56 will generate?</li> </ul>			
52	Louellen and John Bonallack	66 Bould Street Johnsonville Wellington	Yes
<p>The submitter strongly supports the following rules and policies: 4.2.2.1A and 4.2.2.1B, rule 5.1.3.4.3 (height of second unit).</p> <p><b>Decision Requested:</b> That the Council design and make compulsory laws/regulations to ensure that infill housing (in neighbourhoods that have the majority of their housing in single dwelling, or only two single storey dwellings per property) reflects the character of the neighbourhood and does not affect the quality of current residents' lifestyles with regard to sunlight, privacy, over crowding or noise.</p>			
53	Interface	PO Box 22-150 Khandallah	Unknown

		Wellington	
<p>The submitter applauds plan change 56, but proposes one caveat – that council officers should have the discretion to consider multi-unit sheltered housing infill development in or near suburban centres. Sheltered housing refers to 30-45 purpose designed units grouped together for older residents.</p> <p><b>Decision Requested:</b> Amend PC56 in favour of sheltered housing developments and make Wellington the model for New Zealand and give older folk more housing choice.</p>			
54	Ann Hannah	42 Puriri Street Miramar Wellington 6022	No
<p>The submitter supports the Plan Change but seeks one amendment.</p> <p><b>Decision Requested:</b> That a supervising drain layer be appointed to keep an eye on developments and also that access ways be fully investigated.</p>			
55	Prime Property Group	c/- Dave Armour Resource Management Solutions Ltd 8 John Street Titahi Bay Porirua	Yes
<p>The submitter cites numerous concerns about the Plan Change and opposes it in its entirety. Specific provisions noted include:</p> <ul style="list-style-type: none"> <li>• Definitions for access strip and site area</li> <li>• Rule 5.1.1.2: visitor parking</li> <li>• Rule 5.1.3.2B: open space</li> <li>• Rule 5.1.3.4.3 (height of second unit) and rule 5.3.4b.</li> <li>• Rule 5.1.3A: existing uses permitted activity standard, specifically 4.5m height restriction for additions.</li> <li>• Assessment criteria for rule 5.3.4a and 5.3.4b, 5.3.10</li> <li>• Deletion of the controlled activity subdivision rules (5.2.5A and b) and replacement by rule 5.3.14</li> <li>• Assessment criteria in rule 5.3.14, especially 5.3.14.11.</li> </ul> <p><b>Decision Requested:</b> That plan change 56 not be approved.</p>			
56	Urban Perspectives Ltd	PO Box 9042 Wellington Atten: David Grant	Yes
<p>The submitter seeks two changes to PC 56. These include the need to insert a definition for an 'Infill Household Unit' and to amend the wording of Proposed Rule 5.1.3.4.3 (height of a second unit) in order to make it explicitly clear that comprehensive multi-unit housing developments are not subject to rule 5.1.3.4.3.</p> <p><b>Decision Requested:</b> The submitter seeks that:</p> <ul style="list-style-type: none"> <li>• A definition be included within Chapter 3.10 of the Plan: "<b>Infill Household Unit</b> – means a development within the Outer Residential Area involving the creation of a second and only additional household unit which is outside the footprint of an existing household unit and on a fee simple site of less than 1000m<sup>2</sup>."</li> <li>• Amend the wording of 5.1.3.4.3 so that the word 'second' is replaced with the word 'infill'. (draft wording supplied)</li> <li>• Include an advice note after rule 5.1.3.4.3 to indicate that: "for the avoidance of doubt multi-unit development of three or more dwellings requiring resource consent from Rule 5.3.4, 5.4.6 or 5.4.8 are not subject to this 4.5m height restriction on their second or third household units."</li> </ul>			
57	Geoffrey Tomlin	54 Frobisher Street Island Bay Wellington	No
<p>The submitter seeks some wording amendments to three parts of the plan change to acknowledge that neighbours, other than immediately adjoining neighbours, can be affected by infill developments and secondly the loss of sound amenity (through increased noise) is also a valid effect that needs consideration.</p> <p><b>Decision Requested:</b> That wording amendments suggested in the submission be made to the following provisions:</p> <ul style="list-style-type: none"> <li>• Policy 4.2.2.1B – 8<sup>th</sup> paragraph</li> </ul>			

	<ul style="list-style-type: none"> <li>• Rule 5.1.3.A4</li> <li>• 5.3.4.6</li> </ul>		
58	Fiona Christeller Architects Ltd	PO Box 24-1320 Wellington	Yes
<p>The submitter generally supports the intent of the change but has several concerns with the Plan Change, as noted below.</p> <p><b>Decision Requested:</b> The submitter seeks that:</p> <ul style="list-style-type: none"> <li>• Policy 4.2.3.3: “new rules are over controlling”. Prefer that any non-compliance of permitted activity thresholds move to a controlled activity status rather than directly to discretionary status. Also, the assessment of proposals against the design guides should be at the Controlled activity threshold rather than as discretionary activities.</li> <li>• Believe that the perceived problems that initiated PC56 is more a problem with multi-unit developments than adding a second unit. Use the “controlled use” assessment criteria for second household units so that they are treated differently from multi-unit developments.</li> <li>• Rule 5.1.3A and Rule 5.3.4: these clauses are prohibitive to good urban design. Seek that the maximum height of 4.5m in Rule 5.1.3A and of 7m in rule 5.3.4 are deleted and that the residential design guide is introduced as a controlled use assessment criteria to allow design to be considered for each specific site.</li> <li>• Rule 5.1.1.3.4 and 5.3.1.6: Conflict between the urban design requirements for carparking and the rule requiring carparking. Consider reducing the carparking on site rule in inner residential areas or hill-side sites if they are close to public transport routes.</li> <li>• Rule 5.1.3.2B (Open Space): provisions are extremely confusing and overly complicated. Use the ‘coverage site area’ as a guide. Agree that open space could be shared/aggregated. We would like all decks (covered or uncovered) to be counted as exterior amenity and therefore open space (subject to rules 5.1.3.2.5A and 5.3.5.1-9).</li> <li>• Rule 5.1.3.4.3 (height of second unit): “This clause seems to be a sledge hammer cracking a peanut”. We suggest that the residential design guide be used instead to protect privacy as a controlled use assessment criteria.</li> </ul>			
59	Shaun Lawless	63 Ottawa Road Ngaio Wellington	Yes
<p>The submitter opposes the following three key provisions as they are far too restrictive and onerous:</p> <ul style="list-style-type: none"> <li>• Reduction of the number of units allowed on the site as of right</li> <li>• Rule 5.1.3.4.3 (height of second unit)</li> <li>• Rule 5.1.3.2B (open space).</li> </ul> <p>The submitter notes that the multi-unit design guide as it exists provides all the necessary tools to control building quality, scale and amenities.</p> <p><b>Decision Requested:</b> That the Plan Change is revoked in its entirety and that Council embark on comprehensive consultation with the public and building industry rather than pass its legislation down in such a draconian manner.</p>			
60	Patrick John Duignan	31 Waru Street Khandallah Wellington 6035	Yes
<p>The submitter makes a particular submission about Policy 4.2.2.1B and the associated explanatory text. The submitter supports the provision but holds concerns that the policy may be interpreted to support further infill in areas that have already been subjected to infill. The submitter is keen to ensure that previous infill does not create a presumption that new infill will be approved.</p> <p><b>Decision Requested:</b> That the words “existing residential development” in the 2<sup>nd</sup> to last sentence of Policy 4.2.2.1B are amended to read “existing residential type and character” or words to that effect so as to clarify that the compatibility sought is with the existing character not with existing development.</p>			
61	David Barnard	20 Nathan Street Tawa Wellington	No
<p>The submitter raises concerns to do with privacy, building height, permeable surfaces and provisions for vehicles on the development.</p> <p><b>Decision Requested:</b></p>			

That option 3 (outlined in the section 32 report) be adopted as it controls the issues listed above.			
62	McKenzie Higham Architecture	PO Box 9792 Level 1, 91-93 Dixon Street Wellington Atten: Callum McKenzie	Yes
<p>The submitter generally supports the intent of the change but has several concerns with the Plan Change, as noted below.</p> <p><b>Decision Requested:</b> The submitter seeks that:</p> <ul style="list-style-type: none"> <li>• Policy 4.2.3.3: "new rules are over controlling". Prefer that any non-compliance of permitted activity thresholds move to a controlled activity status rather than directly to discretionary status. Also, the assessment of proposals against the design guides should be at the Controlled activity threshold rather than as discretionary activities.</li> <li>• Believe that the perceived problems that initiated PC56 is more a problem with multi-unit developments than adding a second unit. Use the "controlled use" assessment criteria for second household units so that they are treated differently from multi-unit developments.</li> <li>• Rule 5.1.3A and Rule 5.3.4: these clauses are prohibitive to good urban design. Seek that the maximum height of 4.5m in Rule 5.1.3A and of 7m in rule 5.3.4 are deleted and that the residential design guide is introduced as a controlled use assessment criteria to allow design to be considered for each specific site.</li> <li>• Rule 5.1.1.3.4 and 5.3.1.6: Conflict between the urban design requirements for carparking and the rule requiring carparking. Consider reducing the carparking on site rule in inner residential areas or hill-side sites if they are close to public transport routes.</li> <li>• Rule 5.1.3.2B (Open Space): provisions are extremely confusing and overly complicated. Use the 'coverage site area' as a guide. Agree that open space could be shared/aggregated. We would like all decks (covered or uncovered) to be counted as exterior amenity and therefore open space (subject to rules 5.1.3.2.5A and 5.3.5.1-9).</li> <li>• Rule 5.1.3.4.3 (height of second unit): "This clause seems to be a sledge hammer cracking a peanut". We suggest that the residential design guide be used instead to protect privacy as a controlled use assessment criteria.</li> </ul>			
63	Judi Keith-Brown Architects	4 Austin Terrace Mount Victoria Wellington	Yes
<p>The submitter generally supports the intent of the change but has several concerns with the Plan Change, as noted below.</p> <p><b>Decision Requested:</b> The submitter seeks that:</p> <ul style="list-style-type: none"> <li>• Policy 4.2.3.3: "new rules are over controlling". Prefer that any non-compliance of permitted activity thresholds move to a controlled activity status rather than directly to discretionary status. Also, the assessment of proposals against the design guides should be at the Controlled activity threshold rather than as discretionary activities.</li> <li>• Believe that the perceived problems that initiated PC56 is more a problem with multi-unit developments than adding a second unit. Use the "controlled use" assessment criteria for second household units so that they are treated differently from multi-unit developments.</li> <li>• Rule 5.1.3A and Rule 5.3.4: these clauses are prohibitive to good urban design. Seek that the maximum height of 4.5m in Rule 5.1.3A and of 7m in rule 5.3.4 are deleted and that the residential design guide is introduced as a controlled use assessment criteria to allow design to be considered for each specific site.</li> <li>• Rule 5.1.1.3.4 and 5.3.1.6: Conflict between the urban design requirements for carparking and the rule requiring carparking. Consider reducing the carparking on site rule in inner residential areas or hill-side sites if they are close to public transport routes.</li> <li>• Rule 5.1.3.2B (Open Space): provisions are extremely confusing and overly complicated. Use the 'coverage site area' as a guide. Agree that open space could be shared/aggregated. We would like all decks (covered or uncovered) to be counted as exterior amenity and therefore open space (subject to rules 5.1.3.2.5A and 5.3.5.1-9).</li> <li>• Rule 5.1.3.4.3 (height of second unit): "This clause seems to be a sledge hammer cracking a peanut". We suggest that the residential design guide be used instead to protect privacy as a controlled use assessment criteria.</li> </ul>			
64	Jillian Kennemore	25 Clyde Street Island Bay Wellington	Yes
<p>The submitter notes particular concerns over two provisions, being the consideration of vegetation removed prior to subdivision and rule 5.1.3.4.3 (height of second unit) and the consequential pressure it may place on development in Suburban Centre Areas.</p> <p><b>Decision Requested:</b></p>			

		<ul style="list-style-type: none"> <li>Reconsideration of the "2 year" reference in relation to the removal of trees and vegetation prior to infill subdivision/development.</li> <li>Re: Suburban Centres – the introduction (very soon) of rules applying to the Suburban Centre that more specifically address the effects on adjoining residential areas of "permitted maximum infill developments" of suburban centre areas.</li> </ul>	
65	Cuttriss Consultants Ltd	PO Box 30429 Lower Hutt Atten: Sarah Clarke	Yes
<p>The submitter generally supports the intent of the change but has several concerns with the Plan Change, as noted below.</p> <p><b>Decision Requested:</b> The submitter seeks that:</p> <ul style="list-style-type: none"> <li>Policy 4.2.2.1B (para 9) and 4.2.4-1A (Para 6): These comments do not follow the provisions and intent set out under the RMA.</li> <li>Policy 4.2.3.1A (para 1) and Rule 5.1.3.2B: Further clarify the intent of the open space rule to match the stated policy in relation to the greenness or otherwise of the open space and whether it can be split into different locations provided the width requirement is maintained. (Suggested wording changes supplied).</li> <li>Policy 4.2.3.3 (para 4): Oppose the statement that the Council will not consider the permitted baseline when considering the effects of multi-unit developments. Change the word 'will' to 'may' to ensure the Council is left with discretion to consider the permitted baseline as needed.</li> <li>Policy 4.2.4.1A (para 4): Oppose the use of covenants to ensure that residential dwellings are built in accordance with the approved subdivision. We would sooner see the Council issue a consent notice to limit the height of a future dwelling than restrict the nature of the design.</li> <li>Rule 5.1.3.4.3: Height of second unit rule is unreasonable and impractical due to Wellington's topography.</li> <li>Rule 5.1.3A: Oppose this rule as it goes too far. At the very least it should be reworded to only apply where the existing dwelling is not already two stories.</li> <li>Rule 5.3.14: There should be a controlled activity rule that allows for subdivisions that create allotments of over 400m<sup>2</sup>, where a permitted activity dwelling will comply with the lot. There are some instances where a minimum lot size would be useful and make the subdivision process more straight forward.</li> <li>Rule 5.3.4b: Seek that the 7m height limit in the standards and terms of this rule be revised to 8m to be consistent with the existing maximum height provisions.</li> <li>5.3.4.10 and 5.3.4.11: oppose these provisions (assessment of the removal of trees) as being not fair or reasonable to retrospectively penalise someone for removing trees as a permitted activity or where those trees have been removed by a previous owner.</li> </ul>			
66	Rachel Beard	173 Campbell Street Karori Wellington	Unknown
<p>The submitter strongly supports plan change 56, in particular rule 5.1.3.2B (open space requirement) as this will encourage more gardens and rule 5.1.3.4.3 (height of second unit) to ensure privacy.</p> <p><b>Decision Requested:</b> That the Committee note the support of the submitter.</p>			
67	New Zealand Institute of Surveyors – Wellington Branch	c/- David Gibson 101 Yule Street Lyal Bay Wellington 6022	Yes
<p>The submitter is generally supportive of the changes, but notes particular opposition to certain changes or seeks wording amendments.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>Section 3.2.3: the proposed additional items required as part of subdivision consents increase the level of detail needed beyond what should be needed for Council to assess the effects of the proposal. The submitter seeks a number of changes to this section (draft wording supplied).</li> <li>Definition of Access Strip: that the status quo remains or at least that the proposed definition needs significant further refinement (note Hearing Committee comments on this issue in Plan Change 6, the effect on the sunlight access plane rules and how access strip will probably be defined to mean all areas of 'common property').</li> <li>Definition of Site Area: the definition should revert back to its original form as notified in the July 2004 Plan and note that the open space requirement will have a doubling up effect on front lots when the right of way is excluded and open</li> </ul>			

<p>space also required.</p> <ul style="list-style-type: none"> <li>• Policies 4.2.2.1A and 4.2.2.1B: The policy should be deleted or rewritten with a change of focus as it is not justified in the context of the reasons for this plan change and it is in conflict with the subdivision policies (4.2.4.1 and 4.2.4.1A). Suggested policy replacement drafted. Also concerned with the comments regarding cumulative effects and the link to 5.3.3.13.</li> <li>• Policies 4.2.3.1A and 4.2.3.1B: reword policies so that they do need to be 'green' and that paved terraces and decks can be considered as open space (draft wording supplied).</li> <li>• Policy 4.2.4.1A: a small wording change is requested to this policy (draft wording supplied).</li> <li>• Rule 5.1.3.2B: seek amendments to the rules to ensure greater consistency with the Residential Design Guide and between the two residential areas. Seek that all vacant lots that existed before notification of this rule be exempt from the rule. That manoeuvring areas can be included within the open space allocation, or reduce the amount of open space required to 35m<sup>2</sup> (draft wording supplied).</li> <li>• Rule 5.1.3.4.3: That the rule be deleted or at least modified to take into account the physical characteristics of building on sloping sites. Concerns how this rule will work with future earthworks rules. Note that concern stems from where the height of buildings are measured from. Suggest that the 8m height limit be taken from the ground floor level for proposed buildings on the excavated parts of the building platform (rather than existing ground level or assessed ground level). This would avoid the ability of people being able to gain extra building height by undertaking earthworks. creating 3 storey dwellings in some areas.</li> <li>• Rule 5.1.3A: generally support the rule, but seek some minor wording amendments (draft wording supplied).</li> <li>• Rule 5.2.5A and 5.2.5B (Controlled Activity Subdivision rules – deleted from PC56): concerned with the loss of controlled activity subdivision and seek that it be retained, but acknowledge the only way to do so is to introduce a minimum area or shape factor as this will provide Council with the level of assurance it appears to seek. If minimum area adopted, recommend 350m<sup>2</sup> - 400m<sup>2</sup>. Controlled activity subdivisions will work well for cross lease and unit title situations, for boundary adjustments (that do not create new non-compliances or for vacant lots greater than say 350-400m<sup>2</sup>) and for subdivision around existing buildings where the permitted activity conditions in rule 5.1.11 cannot be met.</li> <li>• Rule 5.1.11: lower the thresholds and information requirements for meeting a permitted activity subdivision.</li> <li>• Rule 5.3.3: correct reference in 5.3.3.3 to 5.1.4.3.4 to read 5.1.3.4.3. In 5.3.3.7 replace reference to Multi-unit design guide with Residential Design Guide. Seek that this rule, or another rule, make provisions for non-notification with no service requirement for failure to meet open space requirements where scale of development is consistent with surrounding residential area (draft wording supplied). Amend wording of assessment criteria 5.3.3.11-5.3.3.13 as these are too subjective (draft wording supplied).</li> <li>• Rule 5.3.4a and 5.3.4b: amend drafting of non-notification statement and standards and terms (in particular change the 7m height limit in S&amp;T to be 8m plus the 1m pitched roof allowance [draft wording supplied]).</li> <li>• Rule 5.3.14: seek the retention of earthworks as a matter for discretion. Drafting of standards and terms requires some minor changes (draft wording supplied). Delete reference in 5.3.14.12 to a minimum lot size figure (400m<sup>2</sup>), or if the figure remains a more realistic figure would be 350m<sup>2</sup>. Concerns about subjective and leading nature of 5.3.14.13.</li> <li>• Rule 5.4.5: suggest minor changes to assessment criteria to remove subjective nature of drafting.</li> <li>• Subdivision Design Guide: generally support, but note that as there are no rules for retention of trees or vegetation the associated guidelines for landscaping needs to be omitted or relaxed.</li> </ul>			
68	Richard Walker	9 Milne Tce Island Bay Wellington	Unknown
<p>The submitter makes a number of comments regarding the issues that derive from infill housing. The submitter states the two primary issues that arise from infill housing include the increased population of an area and the pressures on existing infrastructure, and that new buildings detract from the quality of life and value of nearby properties.</p> <p><b>Decision Requested:</b> The submitter notes that:</p> <ul style="list-style-type: none"> <li>• Prominent properties with the potential to significantly block views of others must have restrictions placed on how much view they can block</li> <li>• Older suburban areas with larger properties need to have their specific characters preserved because that is why people move into these areas</li> <li>• It is important to have in place good rules that preserve the value of existing houses and new developments must not be allowed to detract from long established homes.</li> </ul>			
69	Truebridge Callender Beech Ltd	PO Box 13 142 Wellington 6440 Atten: Rhys Phillips	Yes
<p>The submitter opposes some aspects of the Plan Change, stating that PC56 is an overreaction and that the rules create</p>			

uncertainty due to the increase in Council's discretion. The submitter seeks the deletion of a number of provisions, or if not deleted, provides alternative wording.

**Decision Requested:**

- Policy 4.2.2.1A: should be deleted or at the very least rewritten to reflect the fact that infill housing is a desirable activity which has benefits to the city.
- Policies 4.2.3.1A and 4.2.3.1B: policies do not reflect the rule. As decks and paved areas are considered to be open spaces under the rule, the use of the word 'green' is misleading and should be removed.
- Definition of Site Area: Delete the revised definition as the existing site coverage requirements in combination with the proposed open space provisions are sufficient to ensure adequate open space is provided around infill developments. If the definition is retained, ensure that the right of way is included in the calculation for any lot approved before 5 May 2007.
- Definition of Access Strip: Delete the revised definition as it will result in 'amenity areas' also defined as common property being included in the definition which is not intended.
- Rule 5.1.3.2B: The implications of providing this area of open space with a minimum dimension of 4m do not seem to have been fully considered. Greater flexibility is sought to provisions 5.1.3.2B.2 and 5.1.3.2B.7 (draft wording supplied).
- Rule 5.1.3.4.3: Delete this rule as the 4.5m height limit is very restrictive even for flat sites and extremely difficult on sloping sites. Likely to encourage stepped houses on sloped sites with rooftop decks and mono-pitched roofs. If the rule isn't deleted, consider instead a rule similar to the 'deck in side boundary rule' (5.1.3.1.5A) which controls the location of habitable room windows in the vicinity of a boundary (draft wording supplied). Also note that the reference to 1000m<sup>2</sup> site in this rule should be 800m<sup>2</sup> to be consistent with assessment criteria 5.3.14.11.
- Rule 5.3.3: amend the reference under 5.3.3.3 to 5.1.4.3.4 to read 5.1.3.4.3. Also include a sentence in criterion 5.3.3.12 which advises applicants what size of open space will be considered by Council to be large enough to not require neighbours approval.
- Rule 5.3.4B: amend the standard and terms for this rule to allow the height of buildings to be 8m "plus the 1m gable end allowance".
- Assessment Criteria 5.3.4.9 and 5.3.4.10: Delete criterion 5.3.4.10, as the requirement to provide a landscaping plan and criterion 5.3.4.9 is sufficient to manage the effects of new development.
- Assessment Criteria 5.3.10.9 and 5.3.10.12. Delete 5.3.10.12 as it overlaps with 5.3.10.9.
- Assessment Criterion 5.3.14.13: Delete this, or at least rewrite to reflect the fact that infill housing is a desirable activity which has benefits to the city.
- Rule 5.3.14 (b): retain cross-lease and unit title subdivision around consented and existing buildings as Controlled Activities as these subdivisions are simply a method of space allocation and do not change land use patterns. Where a combined landuse and unit title subdivision is being considered, the submitter suggests that a Standard and Term be placed in the Controlled Activity rule that requires landuse consent to be obtained to the development. Where consent is not granted for the building, a subdivision consent under rule 5.4.5 is proposed.
- New Controlled Activity Rule for Boundary Adjustments: Add a new rule to provide controlled activity status for boundary adjustments that do not create vacant allotments or increase the degree of non-compliance for existing buildings.

70	Land Link Ltd	PO Box 29006 Wellington 6443 Atten: Ben Addington	Yes
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The submitter presents a neutral submission and offers comments, suggested amendments, and seeks clarification on a wide variety of matters.

**Decision Requested:**

- Section 3.2.3.9: note that the accuracy of aerial photography is generally poor when compared to site survey data. The Council has easy access to this information therefore the time and cost to produce such information compulsorily by applicants seems unnecessary.
- Note that while the revised policies do act to strengthen the Plan's objectives, unless there is a significant shift to better recognition of city wide cumulative effects, applications will continue to apply to break the rules rather than strive to meet them. Another approach to managing density could be to create ratios of site coverage to usable open space on a sliding scale.
- Policy 4.2.3.3: Concerned that commentary in the policies around not applying the permitted baseline to multi-unit developments is inconsistent with the case law.
- Rule 5.1.1.2: visitor parking should not be rounded down, rather all fractions should be rounded up to ensure the minimum performance standards are met.
- Rule 5.1.3.2B: shared open space in the Inner Residential Area should be larger (60m<sup>2</sup> – 100m<sup>2</sup>) is much more usable and provides greater opportunity for a multiple of users. Any open space should not be on the south side of any

		<p>property or subject to a natural hazard.</p> <ul style="list-style-type: none"> <li>• Rule 5.1.3.4.3: a 4.5m height restriction is likely to be impractical on slopes in excess of 22.5 degrees. Consideration could be given to allowing higher buildings on steeper slopes if earthworks are to be minimised.</li> <li>• Better assessment of cumulative effects onsite is appropriate.</li> <li>• Rule 5.1.3.4.3 and link to clause 5.3.4.4 and the non-notification statements needs further checking as these references seems irrelevant.</li> <li>• Rule 5.3.4: standards and terms limiting height to 7m should extend to 8m.</li> <li>• Rule 5.3.14: note that one assessment criteria refers to a lot size of 400m<sup>2</sup>. Suggest that it is not lot size that is important but rather lot shape so suggest introduction of a shape factor as a guide to the development potential of new lots.</li> <li>• Rule 5.4.5: Clarify how a restricted discretionary subdivision can become an unrestricted discretionary activity. Believe that subdivision of a site should not be any more restrictive than any land use consent needed for activities on a site.</li> <li>• Residential Design Guide: considered more appropriate guide than the previous multi-unit design guide. If anything, encourage the use of more diagrams.</li> </ul>	
71	Andrew Hazelton	PO Box 5639 Wellington	Yes
<p>The submitter supports the intent of the Plan Change, but identified several areas of change or clarification required (specifically lot size and coverage, second dwelling, views and notification processes).</p> <p><b>Decision Requested:</b> The submitter:</p> <ul style="list-style-type: none"> <li>• Notes that while there is no minimum lot size stated in the Plan the rules seem to indicate that the adverse effects may be generated on sites less than 400m<sup>2</sup>. The Plan should include a minimum lot size to control such effects; 300m<sup>2</sup> is proposed. Alternatively, amend the open space rules to require 80m<sup>2</sup> (rule 5.1.3.2B.6) and reduce site coverage to 30% (maximum of 35% where it includes an uncovered deck) (rule 5.1.3.3.2).</li> <li>• Rule 5.1.3.4.3: should make it clear it applies to sites where the existing dwelling is or will be demolished, ie. infill housing should not proceed on the basis that a second unit can be constructed to 8m if the existing property is or has to be removed.</li> <li>• Residential Design Guide and Rule 5.3.4.7: the Plan should recognise that the view from existing houses is as significant an issue related to amenity value as being overlooked by new developments. Amend rule 5.3.4.7 to provide a reference to the 'blocking of significant existing viewshafts'. Include this also in the commentary on the rule.</li> <li>• Notification thresholds: the plan change should clearly spell out when notification or limited notification is required. Limited notification should at least be required when one rule is exceeded and consent of the affected party(s) is not obtained and general notification when two or more rules are exceeded and the consent of affect parties not obtained. A minimum lot threshold would provide a clear expectation of when notification would be required for infill housing in the Outer Residential Area.</li> </ul>			
72	Joanna Woodward	66 Raroa Road Kelburn Wellington 6012	Yes
<p>The submitter opposes three key rules in PC 56 as well as the associated objectives and policies.</p> <p><b>Decision Requested:</b> The submitter seeks the deletion of:</p> <ul style="list-style-type: none"> <li>• Rule 5.1.3.2B (Open space)</li> <li>• Rule 5.1.3.4.3 (height of a second dwelling) and consequential rules (5.3.3.3, 5.3.4B and assessment criteria)</li> <li>• The reinstatement of rule 5.2.5a and b (controlled activity subdivision rules) due to the opposition of proposed subdivision rule 5.3.14.</li> <li>• Any associated wording changes to the objectives and policies relating to these provisions.</li> </ul>			
73	Aro Valley Community Council Inc	48 Aro Street Aro Valley Wellington Atten: Roland Sapsford	Yes
<p>The submitter supports the intent of the Plan Change but does identify certain issues that need to be addressed. It was noted that it has been difficult to assess the ways in which PC 56 will affect Aro Valley, and the connections to PC50 (Aro Valley Boundary Adjustments and Pre-1930 Demolition Rule).</p> <p><b>Decision Requested:</b></p>			

		<ul style="list-style-type: none"> <li>• Site amalgamation as a means of circumventing the intent of the changes needs to be addressed.</li> <li>• The changes to the Residential Design Guide provisions need care wording to ensure they do not undermine the existing protections for character and streetscape.</li> <li>• Compact urban form is not sufficient to deliver on sustainability objectives and the overall approach needs to be more holistic.</li> </ul>	
74	Denis and Mary Lamber	115 Calcutta Street Khandallah Wellington 6035	Unknown
<p>The submitters support the plan change which regulates the size and shape of new infill housing. The submitters are particularly concerned that new subdivisions on unstable hillsides, which will increase the number of dwellings, will only accentuate potential instability.</p> <p><b>Decision Requested:</b> That new limits on the amount of dwellings within an area of land be required to reduce destabilisation.</p>			
75	Alan Reid	160 Wadestown Road Wellington 6012	No
<p>The submitter focuses on aspects of the plan change that need greater emphasis, including the environmental impacts of infill (eg. city green corridors, existing watersheds, amenity value of greenscape, quality and durability of buildings, the living quality of people).</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• That the Council consider strengthening the provisions that relate to assessment of cumulative effects for consents.</li> <li>• The rules should include reference to potential impacts from poorly sited infill on the city greenscape with particular regard to the adverse effects from building in shaded and persistently damp sites</li> <li>• The consideration of these environmental effects should be in the context of subdivision and residential building standards as well as the city greenscape/watershed management.</li> </ul>			
76	Newtown Residents' Association	PO Box 7021 Wellington South	Yes
<p>The submitter strongly supports the plan change, but seeks some minor modifications to various provisions. Particular support is given to Policy 4.2.3.3 and its explanatory text, including the new open space rule (5.1.3.2B), the Residential Design Guide and the Subdivision Design Guide (though for the latter noting that qualified skilled assessors will be an important part of the design review). A detailed submission is made on Rule 5.1.3A relating to existing uses, which outlines the history of that provision from the submitter's perspective.</p> <p><b>Decision Requested:</b> Approve Plan Change 56, with modifications, as outlined below:</p> <ul style="list-style-type: none"> <li>• Rule 5.1.3A: strongly supports this rule in principle but recommends rewording for clarity (draft wording supplied). Changes are specifically recommended to the title of the rule, 5.1.3A.2, 5.1.3A2b and 5.1.3A.4.</li> </ul>			
77	David Russell	83 Stewart Drive Johnsonville Wellington	Yes
<p>The submitter disagrees with rule 5.1.3.4.3 (height of second unit) being restricted to a single storey. There is a contradiction in that there should be minimum open space which becomes impossible to meet depending on building size and section area.</p> <p><b>Decision Requested:</b> That the restriction (rule 5.1.3.4.3) be amended so that two storeys or more should be allowed to achieve the minimum open space requirements and in keeping with the neighbourhood.</p>			
78	CYC Investments Ltd	PO Box 7020 Wellington Atten: Chow Chan	Yes
<p>The submitter opposes the whole plan change in its entirety, noting that the changes proposed have significantly restricted the ability for the efficient use and development of land to occur and the policies now send mixed messages (eg. policies under 4.2.2, 4.2.3 and 4.2.4). Particular mention is made of rule 5.1.3.4.3. Concerned also at the increase in consent applications that will require assessment against the Residential Design Guide, which on past experience, indicates that the guidelines will end up being 'must comply with' rather than just guidelines and further delay consent processing timeframes.</p>			

<b>Decision Requested:</b> That the plan change be withdrawn in its entirety.			
79	RMA Solutions Limited	PO Box 11 680 Wellington Atten: Craig Erskine	Yes
The submitter opposes the whole plan change in its entirety, noting that the changes proposed have significantly restricted the ability for the efficient use and development of land to occur and the policies now send mixed messages (eg. policies under 4.2.2, 4.2.3 and 4.2.4). Particular mention is made of rule 5.1.3.4.3. Concerned also at the increase in consent applications that will require assessment against the Residential Design Guide, which on past experience, indicates that the guidelines will end up being 'must comply with' rather than just guidelines and further delay consent processing timeframes.			
<b>Decision Requested:</b> That the plan change be withdrawn in its entirety.			
80	Otari Wilton's Bush Trust	160 Wilton Road Wellington Atten: Peter Buxton	Yes
The submitter generally supports the plan change but consider the new provisions do not sufficiently explain the reasons for limiting impermeable site coverage. The submission outlines a variety of environmental effects that can result from increased hard surfacing of sites.			
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>• That the Plan spells out clearly in the rules for infill housing and subdivision the hidden hazards that can arise from removing vegetation, increasing the area of permanent hardstand, increasing the flow volumes of storm-water and sewage, and earthworks.</li> <li>• That the Council produce a booklet, which gives an understanding of the relationships between underlying geotechnics, vegetation and earthworks involved in infill housing to land stability and catchment run-off issues.</li> </ul>			
81	Alan Fairless	PO Box 27435 Wellington	Yes
The submitter generally supports the Plan change, but notes some additional comments.			
<b>Decision Requested:</b> The submitter seeks: <ul style="list-style-type: none"> <li>• More creative use of existing buildings</li> <li>• Pedestrian friendly access and driveways</li> <li>• Mixed uses. eg commercial and residential</li> <li>• Historic character empathy.</li> </ul>			
82	Jaqui Tutt	25 Epuni Street Aro Valley Wellington 6021	Yes
The submitter generally supports the proposed changes but notes some additional comments.			
<b>Decision Requested:</b> The submitter seeks: <ul style="list-style-type: none"> <li>• More provision for mixed use</li> <li>• Better provisions for character areas</li> <li>• And better facilities for subdivisions.</li> </ul>			
83	Bruce White	13 Sunrise Boulevard Tawa Wellington	Yes
The submitter considers the plan change over reaches to such an extent that the changes will curtail infill housing to a degree that would be inconsistent with the Plan's objectives to retain a compact city. The rules as currently drafted are likely to be more detrimental to suburbs than beneficial as suburbs that attract development and renewal invariably benefit from it. The submitter has particular concerns about the need to focus more tightly on controlling 'externalities' that arise from infill housing and to focus less on internal amenity values. The submitter notes support for the need to have flexibility in administration of the rules (ie. council discretion), but notes the importance of ensuring that there is clarity of purpose in the rules. Processes should be improved to support this discretion (including effective pre-application meetings, site visits at pre-application stage, review of			

decisions, timeframes for dealing with the consent). The submitter also notes that the Council should be willing to allocate appropriate resource to administration of the new policies and rules rather than requiring the applicant to bear the full cost. The submitter has supplied a detailed outline of changes sought to various provisions of the plan change, as well as an assessment of the Residential Design Guide which outlines the guidelines are demonstrably focused on 'externalities' compared with those that seek to control 'internal amenity effects'.

**Decision Requested:**

That the Council review and revise the Proposed Plan Change 56 and the Residential Design Guide based on the comments above and the specific comments and changes in the submission attachments. Particular changes are proposed to:

- Section 3.2.4.2.1
- Section 4.1: introductory text
- Objective 4.2.1 and associated policies
- Objective 4.2.3 and associated policies
- Objective 4.2.4 and associated policies
- Rule 5.1.3.2B: open space
- Rule 5.1.3.4.3: height of second unit
- Rule 5.1.3A: existing uses (typing correction only)
- Assessment Criterion 5.3.3.13
- Rule 5.3.4
- Rule 5.3.10
- Residential Design Guide

84	Cathy Wood	PO Box 13131 Johnsonville Wellington	Yes
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The submission is the result of the combined effort of five architectural designers (Greg Melville, Sheryle Williams, Cathy Wood and Graham Calcott/Wayne Tansley). All support the intent of the proposal but seek some clarification and amendments to numerous provisions.

General concerns are noted with the design assessment process (which seems to have significant discretion for Council designers in interpreting the design guide). It is unclear in many cases whether neighbours will be required to give approval for minor non-compliance even if the urban designers support the application. The amount of say by neighbours should be minimised as minor encroachments can often lead to much better design outcomes.

**Decision Requested:**

That there is further clarification and amendments to the proposal, as outlined below, and that there is a guarantee of consistency on implementation of the proposed rules.

- Explanatory text for policies 4.2.2.1 – 4.2.2.1B: clarify how the cumulative effects of very minor breaches to the permitted activity standards is to be judged. Define the length and height of a minor breach for all parties to follow.
- Explanatory text for Policy 4.2.3.3: define what compatibility with surrounding residential environment means, hopefully it does not restrict the ascetic of new buildings outside heritage zones.
- Rule 5.1.1.2: good idea, but impossible to ensure parks kept for visitors.
- Policy 4.2.2.1, 4.2.3.1A, Rule 5.1.3.2B: Note the open space can be usable without being on ground level or connected to a living area. Suggest change in size requirement so that 50m<sup>2</sup> for first unit and then 40m<sup>2</sup> for subsequent units. Suggest that 4m width minimum be replaced with an area that contains a 4m square box. Allow design flexibility where open space is on a sloping site that may be unusable. Steep sites cannot always have the required outdoor space suggested in the design guide. Why should a reduced outdoor area require neighbours consent?
- Sunlight Access Planes: seek change to these rules to take into account differing requirements from north to south.
- Rule 5.1.3A: concerned that this rule may be interpreted as meaning ascetic. A modern well design addition can still be sympathetic to the existing building.
- Streetscape: concerned that its too late now to respect existing designs in most streets. Why pull down new house design to the lowest common denominator.
- Policy 4.2.2.1: Clarify whether the intent is to allow two storey's or 9m buildings (which can be 3 stories). The choice of which unit is to be single story should be based on streetscape, topography and site orientation, not on which was built first. Further thought is needed as some areas may change dramatically. Clarify also whether an extra 1m is allowed for pitched roves. May result in tiered developments on sloping sites.
- Rule 5.3.4.11: (kerb side parking): admirable provision but how it is to be monitored?
- Reference to north facing windows: note that the building sites within existing city boundaries are becoming more difficult to build on and this may be difficult to fulfil. Spell out skylights as an option to ensure they are accepted.
- Policy 4.2.2.1: There needs to be enough flexibility in the "following of patterns" to allow for good design, ie. it should not enforce a rigid repetition of character of a few existing houses where those houses are not of good design.

- Policy 4.2.2.1 - Cumulative effects: common with Wellington topography that there are several breaches of rules, which may be minor in each case. Needs to be some definition where there are a number of breaches to prevent a blanket approach being adopted and notification being called each time there is more than one breach. A system to test out the severity of breaches could be extremely useful.
- Seek that a committee of urban designers, town planners and designers be formed to come up with a better outcome than the proposed changes.
- Steep sites need a whole different set of rules than flat sites. Privacy cannot always be achieved on hillsides when outdoor spaces overlook other properties.
- Allow for greater site coverage where a limited upper floor is included
- Reduce maximum height of 8m + 1m (for pitch roof) to 7.5m except for 50% of dwelling footprint on steep sites.
- Change the 1/3 height encroachment in include small area of corner of gable. Include mono pitched roofs.
- Change the winter sun into courtyard to mid summer/mid winter sun.
- Outdoor space: steep sites cannot be achieve unless on decks.
- Rule 5.1.3.2B: suggest 50m<sup>2</sup> for first house, 40m<sup>2</sup> for second house and 30m<sup>2</sup> for third house.
- Residential Design Guide: greater site coverage for single storey or low profile developments and allow reduced outdoor space for townhouse developments.
- Allow two storey dwellings, but control the length of upper floor to any boundary (eg 8m max) and control placement of windows and heights.
- Permitted Baseline: should be able to be used to promote the merits of a proposal. Agree it has been abused in the past but good clear rules should address this.
- Seek rules to define what privacy can be expected (suggestions offered).
- Site coverage is too restrictive as it does not take into account building bulk. Site coverage can be increased if permitted bulk is reduced.

85	Thomas Chong	PO Box 2692 Wellington	No
<p>The submitter does not support Rule 5.1.3.4.3 (height of second unit) or Rule 5.1.3.2B (open space) as the existing residential rules for bulk and location are adequate.</p> <p><b>Decision Requested:</b> The submitter seeks that the existing residential rules be retained as the proposed plan change will not necessarily improve the quality of infill housing and will instead discourage infill housing and make cost of housing less affordable.</p>			

### Submissions not in the prescribed form

Eight other emails or letters were received on the infill housing issue which were not in the prescribed form, or did not contain many elements of what the prescribed form requires and so are not able to be treated as official submissions on the Plan Change.

The emails and letters from the following persons have been noted:

- Melanie Mills (supports the need for control on infill housing)
- Hugh Moseley (supports the direction of PC56)
- Dennis Hamblin (does support high rise developments)
- Marianne Pettigrew (supports infill housing if done tastefully)
- Tom Seaman (Infill housing needs to be stopped in all but exceptional circumstances)
- Kathleen Lambert (generally supports the need to manage infill housing more effectively).
- Edna Feltham (seeks to have concerns made known about the number of houses being built of a given property. Squeezing houses on a site as has been done should not be allowed).
- Rae Andrews (objects to infilling due to its effects on existing houses).

## Further Submissions

Submission Number	Name	Address for Service	Submissions Referred To	Wishes to be heard
FS1	Gary Murdoch	42 Monaghan Ave Karori Wellington	23 – Wellington City Council	Unknown
<p>Submission largely in response to Council's Discussion Document on a Targeted Approach to Infill Housing, but notes some other concerns more related to the provisions outlined in Plan Change 56.</p> <ul style="list-style-type: none"> <li>• Consideration of specific areas for in-fill housing should include the scale of current development</li> <li>• The requirement for off-street parking in areas very close to town (ie. 15 minutes) doesn't take sufficient account of the nature of flating population or other ecological considerations. You demand car parks in areas relatively close to city centre when major cities through-out the world are trying to limit car use.</li> </ul> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• Set up a group with the department whose job it is to work with a 'why not' mentality for proposals that lie within the general ambit of the requirements, but may not be completely compliant.</li> <li>• Consideration of specific areas for in-fill housing should include the scale of current development and whether area within easy walking distance of CBD</li> <li>• Counter productive to insist on housing cars on site when the opportunity to house the population might be foregone.</li> </ul>				
FS2	Shane Crowe	26 Woodland Road Johnsonville Wellington	68 – Roger Walker	Yes
<p>Supports the submitter's comments and the decision requested because considers that buyers pay a premium to purchase stand alone houses to maintain space, privacy, outlook, landscape, sun and daylight. The over development of neighbouring properties severely detracts from the enjoyment of those properties. Wellington's infrastructure best protected by encouraging infill/apartments closer to the city centre. We don't want ad hoc poor quality over developments fragmenting areas leading to degradation of values.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• Allow only low numbers of quality infill units in the Outer Residential Area where they match or exceed the quality of nearby properties.</li> <li>• Council produces a designated map where infill is allowed and to what extent and where it is not allowed as all.</li> <li>• Council needs to stop completely the process of allowing developers initial greed to build large numbers of poor quality housing purely for the developers profit first.</li> <li>• That the Council disallow self dispensation ie. a developer purchasing an adjoining property in order to give themselves permission to build inferior or excessive dwellings outside the Plan guides.</li> </ul>				
FS3	Dale McTavish	59 Owen Street Newtown Wellington 6021	14 – Dale McTavish	No
<p>Supports own original submission. Particular concern expressed about protection needed for character suburbs, especially Newtown, Mt Cook and Berhampore and submission cites particular development examples.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>• Tighter controls on subdivisions, plus a design guide</li> <li>• Open space requirement per dwelling</li> <li>• Reduce permitted height of second unit to 4.5m</li> <li>• Requirements for visitor parking is discrete and should not be allowed inappropriately in character suburbs</li> <li>• That DP56 is passed in full.</li> </ul>				
FS4	Angela Xygalas	PO Box 5214 Wellington	79 – RMA Solutions Ltd	Yes
<p>The submitter agrees with the opposition to the Plan Change outlined by Submitter 79, citing that the plan change is too restrictive on development. Specific provisions opposed to include: 5.1.3A, 5.1.3.2B, 5.1.3.4.3 (5.3.4b), Residential Design Guide, Landscaping requirements, 5.4.5 (including 5.4.5.2a and b), 5.3.10.11, 5.3.14, 5.3.1b, 5.3.3 – 5.3.3.4c, 5.3.3.11 – 5.3.3.13, 5.3.4a – 5.3.4.4, 5.3.4.4 – 5.3.4.11, application of multi-unit design guide for small scale developments.</p> <p><b>Decision Requested:</b></p>				

<ul style="list-style-type: none"> <li>To oppose the plan changes and invite further public input into the rule changes.</li> </ul>				
FS5	Shirley Hampton	PO Box 7086 Wellington	22: George Ridd 28: Brooklyn Residents Assoc.	No
<p>Supports these two submissions as I am also very concerned that, without restrictions and strict guidelines, infill housing could change the face of Wellington and irreparably damage neighbourhoods. Could also have a detrimental effect on why people bought a property for sun, view and space.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>To include a rule which addresses the sunlight access plane issue identified by submitter 22.</li> <li>That infill housing should be sympathetic to the character of existing and surrounding homes</li> <li>Protection of existing vegetation (4.2.3.1C and 5.1.3.2B)</li> <li>Support the open space requirements and that residents which require no open space have the option of apartments</li> <li>That people have a choice of housing and lifestyle</li> <li>More data analysis of future society trends needs to be carried out.</li> </ul>				
FS6	Geoffrey Tomlin	54 Frobisher Street Island Bay Wellington	26: Sunita Hunt and Gavin Dench 34: Jonathan Black 2: Hamish McIntyre 57: Geoffrey Tomlin	No
<p>Completely support everything said by submitter 26. Opposition to a police design team who are paid for their services as noted by Submitter 34. Concerned this will be open to cronyism and abuse. Support submitter 2 in principle, but request that the 3<sup>rd</sup> point under the decision requested instead read: "where all the immediate adjoining neighbours <u>and any others in the vicinity who would be affected</u> do not agree...". My own submission incorrectly reported in the summary. First bullet point of decision requested should read: Policy 4.2.2.1B – 3<sup>rd</sup>, 6<sup>th</sup> and 8<sup>th</sup> paragraphs.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>That these matters be addressed by the Committee.</li> </ul>				
FS7	Ian Athfield	105 Amritsar Street Khandallah Wellington 6035	38: Spencer Holmes Ltd 58: Fiona Christeller Architects 62: McKenzie Higham Architecture 63: Judi Keith-Brown Architects	Yes
<p>Supports submission 38, 58, 62 and 63. Notes congratulations to the Council for recognising that the densification of our cities and towns is one of the biggest challenges facing this country. The existing regulatory environment of measurement and control and tenure and site boundaries presents difficulty in promoting change (ie. zero yards, sunlight ingress controls and comprehensive development versus land subdivision).</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>All re-subdivision within existing planning area should require resource consent</li> <li>Applications should be handled in a similar manner through a comprehensive development and include the structures to be erected on the site</li> <li>The comprehensive development should include all the immediately adjoining properties and a requirement that this should be recorded in the application</li> <li>Zero yard requirements and site coverage as guidelines should replace yard and setback rules and give rise to the objective that internalised open space provides a better solution than external open space subject to the neighbours resolution</li> <li>The only parties to a resource consent should be the immediately adjoining neighbours and Council. No other party can be deemed to be affected unless determined by the Council.</li> <li>It is assumed that any approval given to such a development will also result in a mutual and non-revisited decision by the consenting party</li> <li>The consent would be approved by all immediate neighbours giving approval.</li> <li>If consent by any affected party is not forthcoming then an independent Urban Advisory Panel will adjudicate the matter and be paid for by the applicant.</li> </ul>				
FS8	Paul Kerr-Hislop	23 Kenwyn Tce	76: Newtown Residents Assoc.	Yes

		Newtown Wellington		
<p>Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because of need to encourage owners to retain existing buildings even if they don't comply. Existing buildings contribute to character of older suburbs. Present existing use rights interpretation of RMA penalises preservation of existing non-complying buildings.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>Reword rule 5.1.3A as 'existing building bonus' as recommended by Newtown Residents Assoc.</li> </ul>				
FS9	Carolyn Walker	38 Duthie Street Karori Wellington	76: Newtown Residents Assoc.	Yes
<p>Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because the rule values the existing Wellington housing stock.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS10	E Wallace	31 Salford Street Newlands Wellington	See below	Yes
<p>I support the following submissions:-</p> <ul style="list-style-type: none"> <li>#1 (J &amp; A Backhouse) – re: tightening of rules, but seek 3m minimum setback from all boundaries.</li> <li>#2 (Hamish McIntyre) – agree with all of submission</li> <li>#5 (Alistair Wilson) – agree with compulsory notification to adjoining neighbours</li> <li>#6 (Aart Snoek) – agree with all of submission</li> <li>#7 (Peter Graham) – all of submission particularly providing much fairer deal to neighbours</li> <li>#9 (Beatrice Hamer) – agree with all of submission</li> <li>#11 (William Field) - agree with all of submission and PC56 must apply to Johnsonville</li> <li>#12 (Ngāio Progressive Association) - agree with all of submission</li> <li>#14 (Dale McTavish) - agree with all of submission, but also consider visitor parking essential but should not be at front of house by street, and therefore mandatory for rear or side of dwelling.</li> <li>#15 (Greater WRC) – support in regards to good urban design to protect amenity values</li> <li>#16 (Barbara Woods) - agree with all of submission</li> <li>#17 (Newlands Paparangi Progressive Association) - agree with all of submission and PC56 should apply to all suburbs</li> <li>#18 (Ken Mullholland) - agree with all of submission</li> <li>#20 (Mr &amp; Mrs Watson) - agree with all of submission</li> <li>#21 (P Boardman) – support, but not her reservation re open space requirement</li> <li>#22 (George Ridd) - agree with all of submission and agree that the sunlight access planes should be part of Plan Change 56. These need to be stricter and topographic effects need to be taken into account, meaning rules for flat land are not okay for hilly areas.</li> <li>#23 (WCC) – Only support those aspects that reduce the impact of infill housing in favour of residents not developers. Particularly support all access ways should be removed from site coverage.</li> <li>#24 (P Lawrence) – support and agree storm water capacity needs to be able to cope with infill.</li> <li>#25 (D &amp; E Burson) – support submission and agree there should be requirement for all adjoining property owners to give their approval for all developments (even if only one storey high)</li> <li>#26 (S Hunt &amp; G Dench) – support submissions that infill can reduce quality of life for existing neighbours</li> <li>#27 (H Sharpes &amp; M Graham) - agree with all of submission particularly concerns about approvals without affected party consent.</li> <li>#28 (Brooklyn Residents' Association) - agree with all of submission particularly open space requirement.</li> <li>#30 (Ted Lines) - agree with all of submission and agree there is currently lack of concern for current property owners</li> <li>#33 (J Maclachlan &amp; D Vounatsos) - agree with all of submission, in particular that character of older suburbs is being ruined by infill housing</li> <li>#34 (J Black) – support idea of design police but question impartiality of Wellington Architects – need architects outside of Wellington.</li> <li>#35 (Deborah Olson) - agree with all of submission, but questions the decision requested which said that building heights should be measured from the finished floor excavation. The height must be measured from the original ground</li> </ul>				

level, not what has been added or removed.

- #36 (Trelissick Park Group) – support that PC56 must limit the number of houses per site
- #37 - agree with all of submission
- #43 (Tawa Community Board) - support and agree that minimum lot sizes would be reintroduced so long as minimum lot size not too small. Agree with comments regarding monitoring and compliance and who pays for it and the notification provisions.
- #45 (Gill Hope) - agree with all of submission
- #47 (The Architecture Centre Inc) - agree with all of submission and support the provisions that seek retention of mature trees and open space requirements
- #49 (Wellington City Labour Local Government Committee) - agree with all of submission particularly the request that Councils planning include sunshine hours
- #50 (Frances Robinson Architects) – support provided the suggestion about site coverage is meant to limit development (unclear)
- #52 (L & J Bonallack) - agree with all of submission
- #54 (Ann Hannah) - agree that drain laying be supervised and access ways fully investigated
- #57 (Geoffrey Tomlin) - agree with all of submission particularly that PC56 acknowledge neighbours and that sound amenity is an adverse effect
- #60 (Patrick Duignan) - agree with concern that the policy may be read as supporting further infill, previous infill should not create a presumption that new infill will be approved
- #61 (David Barnard) – support more control over privacy, building height, permeable surfaces and vehicles
- #64 (Jillian Kennemore) – support provided this submission supports making infill housing more difficult and less impact on suburbs
- #66 (Rachel Beard) - agree with all of submission
- #68 (Richard Walker) - agree with all of submission, particularly the fact that people move into areas with bigger sections because this is what they want, value of homes must not be lessened
- #70 (Land Link Ltd) – support need for better assessment of cumulative effects
- #71 (Andrew Hazelton) – support need for minimum lot sizes but needs to be 500m<sup>2</sup> at least. Agree with comments regarding removal of existing home to make way for infill and that notification thresholds need to increase.
- #74 (D & M Lamber) - agree with all of submission
- #75 (Alan Reid) - agree with all of submission particularly cumulative effects and shaded and damp sites
- #76 (Newtown Residents' Association) – agree that qualified skilled assessors will be important part of design review, but should be from outside Wellington
- #80 (Otari Wilton's Bush Trust) – agree environmental effects need to be considered in all aspects of PC56
- #81 (Alan Fairless) – support except for suggestion of mixed uses.

I oppose the following submissions:-

- #4 & 4a (The Eden Trust), #8 (Arthur Udovenko), #10 (Michael Fox), #13 (Janice Lowe), #46 (James Saunders), #48 (Virgil Kan); #55 (Prime Property Group); #58 (Fiona Christeller Architects Ltd); #59 (Shaun Lawless); #62 (McKenzie Higham Architecture); #63 (Judie Keith-Brown Architects); #65 (Cuttriss Consultants Ltd); #72 (Joanna Woodward), #77 (D Russell); #78 (CYC Investments Ltd); #79 (RMA Solutions Ltd); #83 (Bruce White):

oppose and disagree will all of these submissions. They have no right to expect to build without limitations. It is because existing regulations have been abused that PC56 had to be created. Developers rights have outweighed neighbours for too long.

- #19 (Diana O'Neill) – topographic does need to be considered BUT only in regard to the way it can make effects on surrounding properties WORSE!
- #29 (HNZC) - oppose and disagree will all of submission as they are wanting to increase infill housing.
- #31 (R & T Devereux) – oppose and disagree will all of submission. Giving people non prescriptive rules only leads to misinterpretation and breaking of the rules
- #32 (John Bryce) - oppose and disagree will all of submission. There should be no preference over effects, they should all be of equal importance.
- #38 (Spencer Holmes Ltd) - oppose and disagree will all of submission. A planning/surveying company surely more concerned more about their profit margin than what is best for Wellington.
- #39 (NZ Institute of Architects - Wellington Branch) - oppose and disagree will all of submission. If a dwelling is already non-compliant then there should be no way they should be exempt. The maximum height of 4.5 is there for a reason, building on hills have greater impact on surrounding areas particularly with privacy and blocking sunlight.
- #40 (R Walker) and #41 (S Walker) – oppose and disagree with suggestion that infill housing is something which the outer areas should have to put up with.
- #42 (Helen McAra) - oppose and disagree will all of submission – why should existing neighbours and ratepayers be concerned about reducing construction costs for rich developers.
- #53 (Interface) – disagree with concept of sheltered housing as what is described is too broad.
- #56 (Urban Perspectives Ltd) – agree that rules need to be explicitly clear but do not agree or support that multi-unit

housing should be exempt

- #67 (NZ Institute of Surveyors – Wellington Branch) - oppose and disagree will all of submission. Surveyors would want to support infill housing as they make a living from this type of work.
- #69 (Truebridge Callender Beech) - oppose and disagree will all of submission, particularly suggestion that the site area definitions be deleted and that right of way is included in calculations.
- #84 (Cathy Wood) - oppose and disagree will all of submission, particularly the comment that the amount of say by neighbours should be minimised, a neighbours rights should not be underestimated.
- #85 (Thomas Chong) - oppose and disagree will all of submission. The financial issue here is the profit margin a developer can make under the old rules – it is about time the existing rights of neighbours to enjoy their land are recognised – there is not a dollar figure one can put on this.

**Decision Requested (by Further Submissions 10, 11 and 14):**

- That Plan Change 56 is approved without any reduction to limitations on infill housing, and would support even stricter rules that are presently being discussed, eg. mandatory notification by the Council to all neighbors near a proposed infill housing immediately upon receipt of any application. Site coverage also needs to be addressed and the suggestion for a minimum site size is supported.
  - Expect all submissions in support of strengthening Rule Change 56 to be ratified by Council.
  - Rule Change 56 must be for all suburbs of Wellington – areas such as Johnsonville and Newlands should not be exempt from its protection – the rights of these residents to be protected from excessive infill housing etc are just the same as residents in other suburbs of Wellington.

Particularly request the Council to:-

- Ensure that Rules prevent infill housing (and related fences etc) from blocking sunshine and view from neighbors;
- Ensure that sunshine hours as well as sunlight access are part of rules;
- Ensure that there is a minimum of 3 meters from each boundary to where infill house to be built – current 50cm is unacceptable;
- Ensure that there is a real not nominal notification requirement to all neighbors within vicinity of proposed infill housing;
- Ensure that there is an opportunity for an appeal process within Council (i.e. not High Court) and then Environment court BEFORE any work actually commences;
- Ensure that the rights of existing neighbors are protected in the decision process – open notification and participation;
- Ensure that a section ( suggest no section smaller than 900 square meters) can only be subdivided once and only so a single story dwelling can be added to that section;
- Ensure that there is a minimum site size requirement to prevent misinterpretation of rules i.e suggest minimum of 450sqm;
- Ensure that each dwelling (existing house and new additional house) has enough off street parking to side or rear of property for at least 3 cars;
- Ensure that height restriction of infill houses limited to one storey (4.5m) even if on a slope – the ground level used for this measurement should be the measurement before any excavation or soil addition;
- Ensure the character of existing suburbs is maintained by only allowing similar looking buildings to be built;
- Ensure existing vegetation is protected so visual impact of infill housing reduced;
- Ensure the open space requirement is increased not decreased;
- Ensure that developers have to pay for the extra costs resulting from their developments i.e. storm water, sewerage, roading, increased consultation and monitoring of ALL aspects of development from initial application right through to final sign off for road been fixed, plants established & growing (not just planted and left to die) etc;
- Ensure that furniture items to be drawn to scale on plans submitted to prevent impractical rooms been allowed.
- The Council should consider all submissions made on this issue. The Council should also take into account all the feedback that was received in regards to the 'discussion document' for infill housing as many residents thought their submission was made to support Rule Change 56.

FS11	R Wallace	102 Woodland Road Johnsonville Wellington	See FS10	Maybe
Refer to FS 10 above. Same submission comments and Decision Requested.				
FS12	A Wallace	31 Salford Street Newlands	See FS10	Maybe

		Wellington		
Refer to FS10 above. Same submission comments				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Plan Change 56 to be made in the submissions I support</li> <li>The result will be better communication and neighbourhood satisfaction</li> <li>Plan Change should apply to all suburbs including Johnsonville and Newlands.</li> </ul>				
FS13	Mr/Ms Wallace (NB: initial on submission illegible)	31 Salford Street Newlands Wellington	See FS10	No
Refer to FS10 Above. Same submission comments				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Want the Council to ensure that Plan Change 56 is made in light of all the submissions I support. Better quality of change for existing householders.</li> </ul>				
FS14	W Wallace	31 Salford Street Newlands Wellington	See FS10	Maybe
Refer to FS 10 above. Same submission comments and Decision Requested.				
FS15	D Lovie	PO Box 1077 Wellington	76: Newtown Residents Assoc.	Yes
Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because it makes existing buildings a valuable asset which are more likely to be kept and improved. Good initiative for preserving streetscape character and heritage protection.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS16	Andrew Thompson	66 Jubilee Road Khandallah Wellington	2: Hamish McIntyre	No
Supports submitter 2 in respect of the improved consultation and notification provisions (for both plan changes and proposed developments) and that infill should be of a similar character to those in the immediate vicinity. Concerned that promoting high density around train stations is social engineering and that the market can easily decide whether people value vicinity to public transport. Also concerned about why some suburbs are treated differently from others (ie the character inner residential suburbs). Considers not all need to be protected from high rise development and if high rise density is to be promoted then more efficient for these to go near the centre than cramped low rise developments on the periphery.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Better notice of those affected by a change in rules as well as a proposed development</li> <li>Removal of incentives that promote three storey infill developments out of character with existing dwellings</li> <li>Greater green space around properties (to prevent say 4 or more dwellings cramped onto small sites)</li> <li>Consideration of more high-rise development in the inner city suburbs</li> <li>Remove 'closeness to public transport' as a criterion for developments, let the market decide.</li> </ul>				
FS17	Deborah Cranko	Cranko Architects 81 Harbour View Road Northland Wellington	58: Fiona Christeller Architects 62: McKenzie Higham Architecture 63: Judi Keith-Brown Architects 76: Newtown Residents Assoc	No
Supports submission 76 in respect of rule 5.1.3A. Also supports submission 58, 62 and 63 regarding 5.1.1.3.4, 5.3.1.6, 5.1.3.2B and 5.1.3.4.3.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Seeks the decisions set out in submission 58.</li> </ul>				

FS18	Sally Bowman	8 Severn Street Island Bay Wellington	76: Newtown Residents Assoc	No
<p>Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because it makes existing buildings a valuable asset which are more likely to be kept and improved. Good initiative for preserving streetscape character and heritage protection. It will also encourage sensitive well designed second unit infill housing worked around existing buildings. Proposed rule will correct an anomaly that even for complying additions and alterations to an existing structure that resource consent will be required. The anomaly is the total converse of what the public and many owners expect and why developers often demolish rather than work with existing homes.</p> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS19	Truebridge Callender Beach Ltd	PO Box 13 142 Wellington 6440 C/- Rhys Phillips	3: Kerry Saywell 23: Wellington City Council 29: Housing New Zealand 38: Spencer Holmes 65: Cuttriss Consultants Ltd	Yes
<ul style="list-style-type: none"> <li>Support submission 3: conversion of existing cross lease titles to fee simple typically creates no adverse effects, so should be Controlled Activity.</li> <li>Support submission 23 in respect of 5.3.1 and proposed new assessment criteria for visitor parking; Policy 4.2.3.1A and rule 5.3.3 regarding more flexible approach to failure to provide open space (though note it should apply to all open spaces not just those associated with Multi-unit developments; and re-wording of 5.1.3.2B.3 and 5.1.3.2B.7.</li> <li>Supports submission 29 regarding 5.1.1.2 that the visitor parking provisions is not within the scope of the plan change and should be deleted.</li> <li>Supports submission 38 in respect of provision 3.2.2.7.2 that landscaping plans should only be required when planting is necessary to mitigate the effects associated with a development, therefore the last bullet point in 3.2.2.7.2 should be deleted.</li> <li>Supports submission 38 in respect of the request that assessment criteria 5.4.5.2B (bullet point 6) be deleted.</li> <li>Oppose submission 65 in respect of rule 5.1.3.2B.2 (bullet point 2) as the change suggested by the submitter would require the provision of landscaping plans for all open spaces at the time of resource consent regardless of whether or not they comply with the open space provisions, which would be onerous and expensive for applicants.</li> <li>Support submission 65 in respect of 5.1.3.2B.3 and 5.1.3.2B.8 regarding whether these areas can be split into two or more areas.</li> <li>Support submission 65 in respect of the permitted baseline discussion in policy 4.2.3.3.</li> <li>Support Submission 65 in respect of consent notices in Policy 4.2.4.1A.</li> <li>Support submission 65 in respect of 5.1.3.4.3 and notes that the height limit imposed was to protect privacy, not views or sunlight. Submission 65 outlines other options which will seek to protect privacy, whilst facilitating infill development.</li> <li>Support submission 65 in respect of its concerns over rule 5.1.3A.</li> <li>Support submission 65 in respect of rule 5.3.14 which suggested a controlled activity subdivision with a minimum lot size of 400m<sup>2</sup>. TCB would prefer that no minimum lot size were used, but accepts that this would provide greater certainty. TCB suggests 350m<sup>2</sup>.</li> <li>Support submission 65 in respect of assessment criteria 5.3.4.10 and 5.3.4.11.</li> </ul> <p><b>Decision Requested:</b></p> <ul style="list-style-type: none"> <li>That the matters outlined above be addressed by the Committee.</li> </ul>				
FS20	New Zealand Institute of Surveyors – Wellington Branch	101 Yule Street Lyal Bay Wellington 6022	3: Kerry Saywell 23: Wellington City Council	Yes
<ul style="list-style-type: none"> <li>Generally supports submission 3: conversion of existing cross lease titles to fee simple typically creates no adverse effects, and is a more desirable form of tenure than cross-lease. Any effects (say from site coverage) could be controlled by appropriate conditions of consent (eg. consent notices).</li> <li>Opposes submission 23 in respect of the definition of Site Area as it is actually a significant change that is not warranted.</li> <li>Supports submission 23 in respect of assessment criteria 5.3.14.13 (application of Residential Design Guide), rule 5.1.3.2B.2, 5.1.3.2B.3 and 5.1.3.2B.7 (wording amendments to open space rule).</li> </ul>				

- Is neutral for submitter 23 in respect of the definition of Access Strip, and assessment criteria in rule 5.3.3 regarding open space.

**Decision Requested:**

- Accept submission 3, and that where subdivision for a cross lease title to fee simple does not meet the permitted activity standards for permitted subdivision under 5.1.11, then the subdivision be assessed as a Controlled Activity.
- Reject submission 23 in relation to the definition of Site Area
- Accept submission 23 in relation to assessment criteria 5.3.14.13 and rules 5.1.3.2B.2, 5.1.3.2B.3 and 5.1.3.2B.7

FS21	Johnsonville Progressive Association	6 Ohariu Road Johnsonville Wellington 6037 Atten: Tracy Hurst-Porter	11: William Field 12: Ngaio Progressive Assoc.	No
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The submitter supports submissions 11 and 12 and applauds the Councils decision to protect neighbours from poorly designed structures that are ill fitting with the street appeal.

**Decision Requested:**

- Adopt plan change 56 with the inclusion of the following:
  - Rules and guidelines reviewed and revised to ensure they are strongly grounded on cleared defined principles
  - Rules and guidelines should be founded on addressing adverse effects, especially on neighbours (privacy, access to sun/avoidance of shading, openness of outlook, streetscape)
  - Flexible, more principles-based administration with high quality administrative processes, including review and appeal mechanism
  - The focus should be on how things affect surrounding neighbours.
  - Developers should be required to consult with neighbours, neighbours are far better placed to identify what may or may not cause adverse effects.
  - Where neighbours do not concur there should be a mechanism that enables issues to be weighted by an independent adjudicator.

FS22	Tracy Hurst-Porter	6 Ohariu Road Johnsonville Wellington 6037	12: Ngaio Progressive Assoc.	No
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Support submission 12, particularly in respect of the number of infill developments that have proceeded without notification. PC56 promotes the ideals of good design implementation in already established areas. Would like to see that neighbours views are not undermined by the process that developers have a vested interest in circumventing in order to maximise their own financial interests.

**Decision Requested:**

- Adopt plan change 56 with the inclusion of the following:
  - Rules and guidelines reviewed and revised to ensure they are strongly grounded on cleared defined principles
  - Rules and guidelines should be founded on addressing adverse effects, especially on neighbours (privacy, access to sun/avoidance of shading, openness of outlook, streetscape)
  - Flexible, more principles-based administration with high quality administrative processes, including review and appeal mechanism
  - The focus should be on how things affect surrounding neighbours.
  - Developers should be required to consult with neighbours, neighbours are far better placed to identify what may or may not cause adverse effects.
  - Where neighbours do not concur there should be a mechanism that enables issues to be weighted by an independent adjudicator.

FS23	Housing New Zealand Corporation (HNZC)	Tonkin and Taylor Ltd PO Box 2083 Wellington Atten: Nathan Baker	See below	Yes
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1: Joanne and Allan Blackhouse: oppose whole of submission as relief sought unduly restrictive and will significantly limit infill opportunities.

2: Hamish McIntyre: Oppose comments about open space provisions and belief that where not all neighbours agree with a proposal then consent should not be granted. Relief sought unduly restrictive and will significantly limit infill opportunities.

4 and 4A: Eden Trust: support in part as open space provisions and height restrictions are unduly restrictive and will limit development opportunities.

5: Alistair Wilson: Oppose because relief sought is inconsistent with an effects based notification process.

6: Aart Snoek: Oppose whole of submission as relief sought unduly restrictive and will significantly limit infill opportunities.

7: Peter Graham: Oppose whole of submission as relief sought unduly restrictive and will significantly limit infill opportunities.

9: Beatrice Hamer: Oppose comments on Policy 4.2.3.1A (considers 4.2.3.1A should be revised to be consistent with proposed policies 4.2.3.1B and C) and in relation to para 8 of 4.2.2 the submitter considers the policy is unduly restrictive and seeks to maintain the status quo rather than ensuring effects on environment are avoided, remedied or mitigated.

10: Michael Fox: Support submission on open space and height controls.

11: William Field: opposes request that every infill is notified to neighbours as this is inconsistent with an effects based notification process. Also opposes comments on Policy 4.2.2.1A.

12: Ngaio Progressive Assoc: Opposes submission that plan change be adopted in its entirety and that wider notification of infill developments occurs.

13: Janice Lowe: Supports whole of submission by submitter 13 who was opposed to the second dwelling height.

14: Dale McTavish: Opposes submitters comments on open space provisions and height controls.

15: Greater Wellington Regional Council: opposes in part the submitters comments on open space provisions and height controls

16: Barbara Woods: Opposes submitters comments on height controls.

18: Ken Mulholland: Opposes submitters comments regarding notification as this is inconsistent with an effects based notification process.

19: Diana O'Neill: supports in part comments on height controls, specifically the relief that 'one size does not fit all'.

21: Phillipa Boardman: Supports the comments about open space requirement that it is not justified or feasible for all new dwellings.

22: George Ridd: Opposes comments about open space requirements, height controls, visitor carparking and sunlight access planes.

23: Wellington City Council: opposes submission in relation to visitor carparking as issue of carparking should be considered in the future as the strategic approach to parking has not yet been resolved. Supports in part the comments about the open space provisions in particular the need to have greater discretion in dealing with waivers for open space.

25: David and Ethel Burson: Opposes whole submission.

28: Brooklyn Residents Assoc: Opposes comment about open space requirement.

30: Ted Lines: Opposes submission on the bulk, scale and open space provisions.

31: Richard and Tania Devereux: Supports the comments of submission in relation to the height controls and open space provisions.

32: John Bryce: Supports in part comments on provision 5.1.3.4.3 (height controls).

33: John MacLachlan and Dimitri Vounatsos: Oppose comment on policies 4.2.2. Support in part comment on policy 4.2.3.1A and seeks the policy be revised in line with its own submission. Supports in part comments on 5.1.1.2 (visitor parking) as the issue of parking needs to be addressed later once strategic approach to parking resolved. Opposes comments on 5.1.3.2B and 5.1.3.4.3 (and 5.3.4b).

35: Deborah Olson: Opposes comments on 5.1.3.4.3.

36: Trelissick Park Group: Oppose in part comments on rule 5.1.3.4.3, 5.1.3.2B.

37: Opposes comments on open space and height provisions

38: Spencer Homes: Support in part comments over 5.1.3.4.3 and 5.1.3.2B.

40: RJ Walker: Support in part as relief sought generally consistent with own submission seeking a targeted approach.

41: S Walker: Support in part as relief sought generally consistent with own submission seeking a targeted approach.

43: Tawa Community Board: Oppose comments on lot sizes, height controls and notification.

46: James Saunders: Support comments on open space requirements and height controls. Support in part reference to a density limit.

47: Architecture Centre: Oppose comments on 5.1.3.4.3 and 5.1.3.2B.

52: Louellen and John Bonallack: Oppose comments on policy 4.2.2.1A and 5.1.3.4.3.

53: Interface: Support in part the submission regarding greater discretion to consider multi-unit housing as this will provide more opportunity for affordable, good quality housing.

55: Prime Property Group: Support comments on 5.1.1.2 (visitor parking), 5.1.3.2B (open space), 5.1.3.4.3 (height controls).

58: Fiona Christeller Architects Ltd: support comments on 5.1.3.2B and 5.1.3.4.3, but oppose comments on 5.1.3A for reasons set out in own submission.

59: Shaun Lawless: Support comments regarding the reduction of the number of units, 5.1.3.4.3 and 5.1.3.2B.

61: David Barnard: Opposes submission regarding that option 3 of section 32 report be adopted. Option 3 provisions are unduly restrictive etc.

62: McKenzie Higham Architecture: support comments on 5.1.3.2B and 5.1.3.4.3, but oppose comments on 5.1.3A for reasons set out in own submission.

63: Judi Keith-Brown Architects: support comments on 5.1.3.2B and 5.1.3.4.3, but oppose comments on 5.1.3A for reasons set out in own submission.

65: Cuttriss Consultants Ltd: Supports comments on 5.1.3.4.3, but opposes in part comments on 5.1.3A (for reasons outlined in own submission)

66: Rachael Beard: opposes submission on 5.1.3.2B and 5.1.3.4.3.

67: NZ Institute of Surveyors – Wgtn Branch: Support comments on 4.2.3.1A and 5.1.3.4.3. Supports in part comments on 5.1.3A.

69: Truebridge Callender Beech Ltd: Supports in part comments on 4.2.2.1A, 4.2.3.1A and 5.1.3.2B.

70: Land Link Ltd: Opposes in part comment on 5.1.1.2 (parking), opposes comment on 5.1.3.2B, supports comments on 5.1.3.4.3.

72: Joanna Woodward: Supports comments on 5.1.3.2B and 5.1.3.4.3.

76: Newtown Residents' Assoc: Opposes comments on 5.1.3.2b.

78: CYC Investments Ltd: Supports comments on 5.1.3.4.3.

79: RMA Solutions Ltd: Supports comments on 5.1.3.4.3.

84: Cathy Wood: Opposes comments on 5.1.1.2. Supports in part comments on Sunlight Access Planes (stating that the differing requirements for northern and southern Saps could be considered as part of the Councils targeted approach to infill development), Supports in part comments on policy 4.2.2.1 and supports comments on open space requirements (steep sites).

85: Thomas Chong: supports submissions on 5.1.3.4.3 and 5.1.3.2B.

**Decision Requested:**

- Address these matters in light of original submission on Plan Change 56 (submitter 29).

FS24	Stelio Kasoulides	1 Bourke Street Kilbirnie Wellington	23: Wellington City Council	No
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Supports point number 6 of submission 23 regarding open space because I support the flexibility of the Council to waiver the open space requirement if the proposal receives support from an urban design perspective. The submitter considers the open space requirements set out in the Multi-unit design Guide (35m<sup>2</sup> per unit, with provisions for decks instead) is sufficient, but notes that if PC56 is approved then provision for decks must also be included.

Notes that the current requirement of one car park per unit is sufficient.

**Decision Requested:**

- That the matters outlined above be considered by the Committee.

FS25	Roger Walker	19/20 Egmont Street Wellington		Unknown
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Supports Further Submission 24, regarding the idea that PC56 should allow for pro-rata elevated outdoor space at 14.5m<sup>2</sup>. Wellington's topography and the trend towards more efficiently planned (and smaller household units) makes 50m<sup>2</sup> as elevated outdoor space excessive at best and unachievable at worst.

**Decision Requested:**

- That the matters outlined above be considered by the Committee.

FS26	John Morrison	6 Hargreaves Street Mt Cook Wellington 6021	76: Newtown Residents Assoc.	Yes
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Supports submission 76 in respect of the existing building bonus because it provides a sensible and workable mechanism to control development in accordance with the wishes of residents; it corrects the current perverse process of requiring resource consents for complying additions to existing buildings; will reduce the complexity of adapting heritage buildings for new uses and promote their retention.

**Decision Requested:**

- Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.

FS27	Keryn Wear	Apartment 8 30 Hanson Street Mt Cook Wellington	76: Newtown Residents Assoc.	No
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Supports submission 76 in respect of the existing building bonus because it corrects an anomaly that requires resource consents for complying additions to existing buildings.

<b>Decision Requested:</b>				
<ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS28	Alan Minty	12 Cavalry Close Crofton Downs Wellington	76: Newtown Residents Assoc.	Yes
Supports submission 76 in respect of the existing building bonus because this issue was raised as part of the hearings process on Plan Change 39. It will increase the value of existing buildings and remove the situation where complying additions require a resource consent if the existing building does not comply.				
<b>Decision Requested:</b>				
<ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS29	Steve Dunn	1 Nikau Street Wellington	76: Newtown Residents Assoc.	Yes
Supports submission 76 in respect of the existing building bonus because it will assist in retaining existing building features/structures that give character and are accepted and will not require a resource consent for complying alterations (more cost effective and efficient).				
<b>Decision Requested:</b>				
<ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS30	Hilda Hudson	2 Corunna Ave Newtown Wellington 6021	76: Newtown Residents Assoc.	No
Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because it makes existing buildings a valuable asset which are more likely to be kept and improved. Good initiative for preserving streetscape character and heritage protection. It will also encourage sensitive well designed second unit infill housing worked around existing buildings. Proposed rule will correct an anomaly that even for complying additions and alterations to an existing structure that resource consent will be required. The anomaly is the total converse of what the public and many owners expect and why developers often demolish rather than work with existing homes.				
<b>Decision Requested:</b>				
<ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS31	Jonathan Wilson	Wilson Architecture Centre PO Box 6717 Wellington	76: Newtown Residents Assoc.	No
Supports submission 76 in respect of the existing building bonus because it is a fair resolution of working with heritage context and new planning rules. It is nonsense to have to make resource consent applications for complying additions if original buildings comply with the planning rules at the time of its construction.				
<b>Decision Requested:</b>				
<ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS32	McKenzie Higham Architecture	PO Box 9792 Wellington	76: Newtown Residents Assoc.	Yes
Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because it makes existing buildings a valuable asset which are more likely to be kept and improved. Good initiative for preserving streetscape character and heritage protection. It will also encourage sensitive well designed second unit infill housing worked around existing buildings. Proposed rule will correct an anomaly that even for complying additions and alterations to an existing structure that resource consent will be required. The anomaly is the total converse of what the public and many owners expect and why developers often demolish rather than work with existing homes.				

<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS33	Katharine Gebbie	37 Sutherland Road Melrose Wellington 6023	76: Newtown Residents Assoc.	Yes
Supports the Newtown Residents Assoc. submission on the 'existing building bonus' rule 5.1.3A, because it makes existing buildings a valuable asset which are more likely to be kept and improved. Good initiative for preserving streetscape character and heritage protection. It will also encourage sensitive well designed second unit infill housing worked around existing buildings. Proposed rule will correct an anomaly that even for complying additions and alterations to an existing structure that resource consent will be required.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS34	Gus Watt	15 Frederick Street Te Aro Wellington	76: Newtown Residents Assoc.	No
Supports submission 76 in respect of the existing building bonus because it makes existing buildings a valuable asset.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS35	Steve Stirrat & Marilyn Head	105 Owen Street Newtown Wellington	76: Newtown Residents Assoc.	Yes
Supports submission 76 in respect of the existing building bonus because it ensures that existing buildings will be valued by both private owners and developers alike. There will be a significant penalty for complying additions and alterations to an existing structure configured outside the Plan rules is a resource consent is required. The penalty is the total opposite of what the public and many owners expect from existing use rights and leads to the demolition of character homes rather than their retention.				
<b>Decision Requested:</b> <ul style="list-style-type: none"> <li>Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.</li> </ul>				
FS36	Bruce White	13 Sunrise Boulevard Tawa Wellington		Yes
I broadly support the following submissions: 3 – re cross leases 4 and 4a – re excessive additional rules and regulations 5 – re flawed process 8 – re effect will be excessive curtailment of infill housing 10 – re open space requirement and height restriction will stifle growth 13 – re opposition to height restriction 19 – re need to have regard for topography in relation to height restriction, and one size does not fit all. 21 – re concerns about the open space requirement, trees that block sun. Some sympathy with aspects of other points made – including that height restriction should apply only where it has the stated effects. 31 – re height restriction and open space requirements being too restrictive – and the residential design being extremely prescriptive. 32 – re bulk and location rules being too restrictive 38 - re concern elements of prescribed new requirements will be too restrictive 39 – re concerns about height restriction and open space requirement being too restrictive, notably on sloping sites 42- re taking a wrong step towards more restrictiveness 46 – re opposition to open space requirement 48 – re need to amend height restriction and open space requirements, though I do not necessarily support the specific amendments proposed.				

- 55 – in relation to Plan change needing to be re-worked
- 58 – re open space requirement being inappropriate, and some other concerns raised.
- 59 – re open space requirement and height restriction.
- 62 – re the policy being over controlling, including re height restriction and open space requirement.
- 63 – ditto.
- 65 – re open space requirement and height restriction.
- 69 – general support for thrust of this submission. Without good process, greater discretion will increase uncertainty.
- 72 – re open space requirement and height restriction
- 77- re height restriction and open space requirement
- 78 – re the plan being excessively restrictive
- 79 – ditto
- 83 – my submission
- 85 – re height restriction and open space requirement.

I generally oppose, or have a neutral view, on most of the other submissions – though to varying degrees, some raise relevant issues.

The submitter also makes the following points:

- Infill housing has been identified as having an important role to play in easing the imbalances of supply and demand in the housing market and in maintaining housing affordability. Infill housing should therefore be facilitated by the Plan, whereas PC56 could seriously curtail infill housing.
- The open space and height restriction requirements of PC56 are particularly problematic, making many infill housing developments not feasible.
- Flexible application of PC 56 rules and guidelines may provide a solution, but first need to be reviewed to ensure that are strongly grounded in clearly defined purposes.
- Rules and guidelines should be founded on addressing adverse 'external' effects, especially on neighbours (privacy, access to sun/avoidance of shading, openness of outlook, streetscape)
- Flexible, more principles-based administration with high quality administrative processes, including review and appeal mechanism
- Consistent with an external effects focus, developers should be required to consult with neighbours, neighbours are far better placed to identify what may or may not cause adverse effects. Where neighbours do not concur there should be a mechanism that enables issues to be weighted by an independent adjudicator.

**Decision Requested:**

- The plan change needs to be better focused and targeted on addressing externalities, and needs to be pruned back so that it does not deal with matters of design that are internal to a development.
- The resulting guidelines should be administered flexibly, but more strongly grounded by firm and clear processes so that outcomes are reasonably predictable
- More consideration needs to be given to mechanisms that help to achieve better alignment of the incentives facing developers and potential adversely affected parties.

FS37	Peter Frater	PO Box 20.000 Newtown Wellington	76: Newtown Residents Assoc.	Yes
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Supports submission 76 in respect of the existing building bonus.

**Decision Requested:**

- Modification of Rule 5.1.3A as the Newtown Residents Assoc. recommends.