

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
182	FS6.1	Support	Generally supports submission from Historic Places Wellington.	Allow
214	FS6.2	Support	Generally supports submission from Mt Victoria Historical Society.	Allow
284	FS15.1	Support	Supports the submission of Out of Home Media Association in its entirety for the following reasons: a. The PWDP proposed amendments to the signage provisions that are unduly prohibitive and will have a significant adverse effect on the out of home media / third party advertising (and the like) industry; and b. For all the reasons set out in OOHMAA's submission.	Allow the submission in its entirety.
161	FS16.19	Support	Patriarch Claude Khan said in the media in 2011 "He had no plans to "pull it down or disfigure it" and said the home should be afforded protection under the council's district plan, but not if it meant restrictions would be imposed. "If there were any restrictions on the owner, no, I'm not interested." Council's and Heritage New Zealand's actions do not appear to show respect and consideration to his clearly stated position.	Seeks that Kahn House to be wholly removed from Schedule 1 'Heritage Buildings'.
128	FS18.1	Support	Ruapapa Limited supports this submission.	Allow
237	FS18.2	Support	Ruapapa Limited supports this submission.	Allow
391	FS20.1	Oppose	Seeks that the whole of the submission be disallowed.	Disallow
345	FS22.1	Oppose	In paragraph 6 of their submission, Forest and Bird submit that "residential SNAs and the provisions that protect them be reinserted in the Plan". The further submitter agrees with the approach adopted by the Council omitting residential SNAs from the Plan. Reinstatement of SNAs over residentially zoned lots would put unnecessary controls over people who for the most part nurture and protect native bush on their properties.	Seeks that Council retain SNAs as shown in the Proposed Plan, subject to fine tuning identified in their original submission (1). Does not want the Council to include any residential lots as part of the SNAs or any vegetation clearance rules in the District Plan.
389	FS26.1	Oppose	The further submitter seeks that the changes sought particularly in relation to Shelly Bay and Watts Peninsula in the submission be disallowed. This submission is primarily directed at the changes sought in relation to Shelly Bay and Watts Peninsula, which concern EMPI. There is also a request to be allowed to create papakainga in Open Space and Rural land and on Ridgeline and Hilltop and Special Amenity Landscape that may cause concern, because there is no definition of what papakainga might look like, for example in relation to size, height etc. Shelly Bay and Watts Peninsula are very significant areas of land and hugely valued by the local community. The planning rules must allow the community to be fully involved in planning for their future, and the submission by Taranaki Whānui would limit this ability. The submission from Taranaki Whānui would remove all protections, many of them long standing and uncontested for decades, from these important areas of land, and make community involvement much less likely and/or limit the need for community involvement. The planning rules must allow the community to be fully involved in planning for their future. On that basis, the submission on behalf of Taranaki Whānui is opposed. EMPI expects that the local community will welcome an engagement first process, which would be followed by changing planning rules as appropriate (through a Plan Change) with community support.	Disallow

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290	FS32.1	Support	Submitter has restricted this submission to areas of relevance to Orienteering Wellington, and does not feel competent to reflect on some of the wider aspects of the plan and submission 290. It is their understanding that the submission includes a proposal to build medium density housing within the original submitters land interest, and retain a further block designated as an NOSZ. The area being proposed to be an NOSZ includes land that they have been provided access to for orienteering events by Kilmarston Developments. This area, which is adjacent to the Huntleigh Reserve has high value to our organisation in its natural state. It has potential to be a significant asset to the local community. Submitter notes the "Reasons" (section B, page 6 of the submission) text recognises the value of linkages in this area and a Willingness to enter dialogue over mechanisms to support both the NOSZ and residential uses of this land. They support this. Arrangements that allow for careful development, enhancement of linkages to other public land and tracks, and retention of the natural value of the reserve-adjacent land would benefit the community, and specifically ourselves as an orienteering club providing outdoor experiences to residents of the area. Submitter notes that the submission also includes a request to provide for installation of a water reservoir within the land identified as NOSZ. The specifics of the land designations that permit or hinder this are not within my competency. Considers that use of the proposed NOSZ area is unlikely to be unduly compromised by the presence of such a reservoir, and to note that with appropriate design, there may be access and linkage benefits from track infrastructure required for installation and maintenance of the reservoir. The reaching of agreement as described in "Reasons" section B (page 6 of submission) is far preferable to our organization that the alternative proposed in section C (bottom of page 6).	Allow
284	FS34.1	Support	Supports the submission of Out of Home Media Association in its entirety for the following reasons: a. The PWDP proposed amendments to the signage provisions that are unduly prohibitive and will have a significant adverse effect on the out of home media / third party advertising (and the like) industry; and b. For all the reasons set out in OOHMAA's submission.	Allow the submission in its entirety.
242	FS35.1	Support	Not specified.	Allow the submission in its entirety.
443	FS35.2	Support	Not specified.	Allow the submission in its entirety.
364	FS35.3	Support	Not specified.	Allow the submission in its entirety.
231	FS35.4	Support	Not specified.	Allow the submission in its entirety.
305	FS35.5	Support	Not specified.	Allow the submission in its entirety.
154	FS35.6	Support	Not specified.	Allow the submission in its entirety.
128	FS38.1	Support	Not specified.	Allow the submission in its entirety.
237	FS38.2	Support	Not specified.	Allow the submission in its entirety.
374	FS39.25	Support	Supports the Glenside Progressive Association's submission as it pertains to all Wellington's Ridgelines and Hilltops as agreed in Plan Change 33, and now forming part of the Operative District Plan. This includes Mount Victoria Ridgeline (number 22 Alexandra Road). Council's logic appears to be to propose to rezone land from Rural/Open Space to Residential, and then discard the Ridgelines and Hilltops protections because of the proposed rezoning. It is as the Glenside Progressive Association says, a nonsense.	Allow the submission in its entirety.

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142	FS39.26	Support	Support Mr Tiley's submission about the importance of these listed ridgelines to Wellington's landscape, environment, and liveability. Mount Victoria ridgeline is one of the identified ridgelines in the Proposed District Plan, as it is also in the Operative District Plan. Our submission is that number 22 Alexandra Road must remain within the identified Mount Victoria Ridgeline as it is in the Operative Plan, rather than be removed from it as is proposed under the Proposed District Plan. We also consider that the intention to remain relatively undeveloped as a crucially important ridgeline should be achieved by retaining the Operative District Plan Open Space zoning rather than rezoning to Residential as is proposed in the Proposed District Plan.	Allow the submission in its entirety.
401	FS39.27	Support	Support Ms Harper and Mr Pemberton's submission, because it emphasises how important the 'green belt' is to our city. Submitter highlights this submission as reflective of the high value that Wellingtonians place on our Town Belt. That underpins their request that number 22 Alexandra Road retains the Open Space zoning and Ridgeline and Hilltops protection status as it is in the Operative District Plan.	Allow the submission in its entirety.
342	FS39.28	Support	Supports the approach of the MVRA submission, which seeks to protect and enhance the townscape of Mount Victoria. We agree with their submission's reference to 'soft fringes' against the Town Belt, the importance of green and open spaces, and the iconic values of the wider views of Mount Victoria. We particularly support the reference to special protection being needed for 'Mt Victoria bush and lookout - Town Belt' and 'There have already been a number of encroachments on the Matairangi - Mt Victoria town belt to support private development.' Supporting MVRA's reference to special protection for Mount Victoria bus and lookout – Town Belt' and avoiding further intrusions into what is read visually as Town Belt and the critical Mount Victoria Ridgeline, we request that protection for Mount Victoria Lookout is achieved by number 22 Alexandra Road retaining the Open Space zoning and Ridgeline and Hilltops protection status as it is in the Operative District Plan.	Allow the submission in its entirety.
123	FS39.29	Support	Support this specific aspect of VUWSA's submission. Our contention is that logically 22 Alexandra Road forms a highly visual part of the Mount Victoria ridgeline directly above the Central City and suburbs of Mount Victoria, Oriental Bay and Roseneath. The Town Belt is a Special Amenity Landscape. Logically and visually Lookout Road including 22 Alexandra Road is without question one of the significant landscapes of our city, and is covered by the broad sweep of VUWSA's request. Supporting VUWSA's request for greatly increasing protection to our most significant landscapes the Mount Victoria Ridgeline should retain the same protections from development as it has had for decades.	Allow the submission in its entirety.
298	FS42.1	Support	Karori Resident's Association believe the community will benefit from medium density housing. We believe the developer addresses key issues such as planting of native trees, environmental support of the area with remaining land they own, building communal areas for residents, support of local businesses and organisations, catering to different ages & life stages in planning & supports passive builds where able. [Inferred reference to submission 298]	Allow the submission in its entirety.

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298	FS43.1	Support	This type of development would serve our community well by providing currently unused, easily accessible land for medium density housing which the community would benefit hugely from. The developer is progressive in his planning and engaged in environmentally advantageous practices and also addresses communal living practices within his designs. [Inferred reference to submission 298]	Allow the submission in its entirety.
374	FS49.1	Support	Glenside Progressive Association correctly identifies how important ridgelines and hilltops are to the character, liveability, and natural environment of Wellington. Their submission does not seek to take away existing use rights, but to protect existing environments from as of right development. We particularly focus on the Mt Victoria ridgeline which is part of the iconic backdrop to the central city.	Seeks that the submission be allowed, particularly as it relates to the retention of planning controls over the 19 ridgelines identified in the Operative District Plan. The submitter seeks the protection of the Mount Victoria ridgeline, by keeping #22 Alexandra Road (encompassing the Mount Victoria trig, Radio and Communications Tower and crennelated white 'Castle' building) which is part of the summit ridge of Mount Victoria within the ridgeline and hilltop overlay as it enjoys in the Operative District Plan, rather than removing it from the overlay as is proposed in the Proposed Plan.
374	FS50.1	Support	Glenside Progressive Association correctly identifies how important ridgelines and hilltops are to the character, liveability, and natural environment of Wellington. Their submission does not seek to take away existing use rights, but to protect existing environments from as of right development. We particularly focus on the Mt Victoria ridgeline which is part of the iconic backdrop to the central city.	Seeks that the submission be allowed, particularly as it relates to the retention of planning controls over the 19 ridgelines identified in the Operative District Plan. The submitter seeks the protection of the Mount Victoria ridgeline, by keeping #22 Alexandra Road (encompassing the Mount Victoria trig, Radio and Communications Tower and crennelated white 'Castle' building) which is part of the summit ridge of Mount Victoria within the ridgeline and hilltop overlay as it enjoys in the Operative District Plan, rather than removing it from the overlay as is proposed in the Proposed Plan.
343	FS54.51	Support	Not specified.	Allow
488	FS54.52	Support	Not specified.	Allow
275	FS54.53	Oppose	We particularly focus on the Mt Victoria ridgeline which is part of the iconic backdrop to the central city.	Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing. Reject increasing character areas in the PDP.

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154	FS54.54	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

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214	FS54.57	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	Disallow

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331	FS54.58	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

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342	FS54.59	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

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305	FS54.61	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

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233	FS54.62	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
412	FS54.63	Oppose	<p>For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.</p>	<p>Disallow the submission in full to the extent that this relates to character areas or reducing the amount of enabled housing.</p> <p>Reject increasing character areas in the PDP.</p>

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
429	FS54.64	Oppose	For character areas, the central test is “other” qualifying matter under clause 3.33(3) of the NPS-UD, alongside the objectives and purpose of the NPS-UD. There is an extremely high bar to creating a character area. The reduction in development capacity must be justified against the national significance of urban development and the objectives of the NPS-UD. Cities are dynamic and changeable. Indeed Wellington underwent many built changes before the currently form was locked in place by modern zoning documents. New housing and residents are a positive to encourage, rather a negative to push out further or crowd into the remaining housing stock. It is significantly more climate friendly to allow denser housing in inner-suburbs, rather than displacing development into greenfields, even accounting for embodied carbon. Character areas are in inner-city suburbs which are highly connected to amenities and already have high-mode share of low emissions transport. This land is often the most resilient. More residents can be easily absorbed in these suburbs and will create a positive impact on that suburb. The counterfactual – the status quo – is that the best quality land in the city is locked away by wealthy residents who seek to preserve an unsustainable way of life and/or their property values. This causes reduced supply and higher prices, higher rents, lower quality, displacement of low-income residents, and pushes residents to worse locations with higher lifetime emissions. The development capacity lost through character areas is extremely weighty; only very ‘character’ of very high quality can be justified. It must also be a site-specific analysis; the current broadbrush suburb-by-suburb analysis in the current District Plan is not allowed. The approaches advocated by the submitters is erroneous under the NPS-UD and should be rejected. Submitters cannot point to individual streets or houses they subjectively find as ‘character’ as this does not meet the stringent evidential requirement of clause 3.33(3). Submitters cannot request to go back to the current District Plan character areas, as these are untenable under the new NPS-UD test. Submitters cannot point to the Boffa Miskel report and adopt its recommendation. The report was written before the enactment of the NPS-UD. And, crucially, this approach begs the question of how the report fits into the NPS-UD test in clause 3.33(3). The approach in the PDP, where only contiguous and coherent pockets of high-quality character are proposed, is legal under the NPS-UD.	Seeks that the Johnsonville Train Line is designated as mass rapid transit (and its associated train stations)
290	FS56.1	Support	Support and agree with the overall intent of the submission which will achieve a clear delineation between environmental outcomes (i.e. residential development and special amenity landscapes) and provide access and linkages to spaces identified as Natural Open Space Zone. The submission recognises the strategic importance of providing community infrastructure and housing on the basis that the appropriate planning framework is applied over the submitters land. Accepting the submission gives the best chance at securing land and open space networks for the community.	Allow the submission in its entirety.
214	FS57.1	Support	Aligns with belief that a balanced approach is need to housing intensification. That is a balance between the need to enable more intensive development with retaining the best of our character & heritage housing. There is more than enough existing capacity for higher density & affordable housing in central city & inner-city suburb fringe areas (along arterial routes) on brownfield sites. Not by taking a scattergun approach through historic inner-city suburbs resulting in the destruction of character and heritage which is essential to liveability and our identity.	Allow the submission in its entirety.
154	FS57.2	Support	Aligns with belief that a balanced approach is need to housing intensification. That is a balance between the need to enable more intensive development with retaining the best of our character & heritage housing. There is more than enough existing capacity for higher density & affordable housing in central city & inner-city suburb fringe areas (along arterial routes) on brownfield sites. Not by taking a scattergun approach through historic inner-city suburbs resulting in the destruction of character and heritage which is essential to liveability and our identity.	Allow the submission in its entirety.

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
290	FS58.1	Support	Support and agree with the overall intent of the submission which will achieve a clear delineation between environmental outcomes (i.e. residential development and special amenity landscapes) and provide access and linkages to spaces identified as Natural Open Space Zone. The submission recognises the strategic importance of providing community infrastructure and housing on the basis that the appropriate planning framework is applied over the submitters land. Accepting the submission gives the best chance at securing land and open space networks for the community.	Allow the submission in its entirety.
391	FS63.4	Oppose	Considers that the original submitter's points are about removing character precincts from the plan. The precincts are important to protecting and preserving Wellington's townscape and sense of place, and can be retained and increased while still allowing enough realisable development capacity. Newtown Residents Association support the Council using Character as a Qualifying Matter to modify the permitted building heights and other matters under NPS-UD 2020 or the MDRS. [Note that the further submission referred to submission points 391.182, 391.183, 391.184, 391.204, 391.205, 391.221 to 391.238 however these do not relate to the reason provided]	Disallow
290	FS65.1	Oppose	Much of this SW area of land would be part of a reserve contribution for the medium density residential development of a portion of the land on Ngaio facing slopes. But more importantly, this land hosts some of the best examples of native forest in Wellington with mature podocarps such as matai, miro and totara interspersed in mature tawa and kohekohe forest. The natural values here are incredibly high and support a widening variety of resident native birds such as kakariki, kaka, kereru and occasionally bellbird (korimako). Kilmarston Developments are also seeking to have a large reservoir permitted to be built in the Natural Open Space zone to support his development. This is despite that aspect of his development being dropped from revised concept plans submitted to Greater Wellington in 2019 to justify extending resource consents. Original consent plans had this reservoir positioned on slopes facing Crofton Downs above the walking track to Crows Nest. It is unclear where it would now be located as a revised subdivision plan or master plan process has not been undertaken.	Disallow the submission in its entirety.
290	FS67.1	Oppose	Status quo should remain with the Special Amenity Landscape and no permission for the infrastructure within the Natural open Space Zone. Impacts will be to remove regenerating native forest which provides part of a corridor for fauna from Zealandia to Mt Kaukau. Major impact on storm water flows into streams in the valleys (Awarua catchment and Silverstream). Possible introduction of land instability. No mention of upgrade to lower suburb water infrastructure. Crumbling water infrastructure for 100 year old water pipes (ref. water leak complaints).	Disallow the submission in its entirety.
391	FS68.2	Oppose		Disallow the submission in its entirety.
154	FS68.54	Support		Allow the submission in its entirety.
430	FS68.55	Support	Supports this submission because it supports extending character precincts to Balmoral Terrace Newtown.	Allow the submission in its entirety.
264	FS68.56	Support	Supports submission 264 in its entirety as it seeks to extend character precincts to Lawrence Street, Newtown.	Allow the submission in its entirety.
331	FS68.57	Support	Supports submission 331 as it supports character extensions in Newtown.	Allow the submission in its entirety.
194	FS68.58	Support	Supports submission 194 in its entirety because it supports 50% character protection in Newtown Owen Street	Allow the submission in its entirety.
233	FS68.59	Support	Supports the submission 233.	Allow
254	FS68.60	Oppose	Opposes Generation Zero submission in its entirety because it goes against any character extensions and preservation in Newtown and it seeks to extend the walkable Catchment.	Disallow the submission in its entirety.

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333	FS71.5	Support	The TRA's principal submissions addressed many (if not all) of the shortcomings the submitter observes in the Proposed District Plan. The submitter declares that they fully support the Thorndon Residents' Association's principal submission, as well as any further submissions by the Association, including their reasons to support or oppose other submission points.	Allow the submission in its entirety.
415	FS76.11	Support	<p>Supports the Submitter's submission (415) in its entirety and consider that the whole submission must be read in full. It is exceptional and outstanding in the detail, in-depth factual supporting evidence, logical arguments and superb data and analysis. The summary issued by the WCC is a very poor reflection of the detail, important findings, and relevant concerns with the Council's processes that relate not only to their home but to my home (the Kahn House).</p> <p>Considers that WCC should not be able to list isolated individual homes (especially when not part of a heritage area, when hidden from public view, and when public access will never be allowed), without a thorough evaluation which includes the costs to the individuals compared to public benefit (if any), and, in particular, without the level of detail and evidence as demonstrated and given in the evaluation from Submitter No. 415.</p>	Delete Item 514 (28 Robieson St) from SCHED1 - Heritage Buildings
284	FS77.1	Support	Supports the submission of Out of Home Media Association in its entirety for the following reasons: <ul style="list-style-type: none"> a. The PWDP proposed amendments to the signage provisions that are unduly prohibitive and will have a significant adverse effect on the out of home media / third party advertising (and the like) industry; and b. For all the reasons set out in OOHMAA's submission. 	Allow the submission in its entirety.
290	FS78.1	Oppose	<p>Support the aspects of the PDP that show Significant Natural Areas and Significant Amenity Landscape on 76 Silverstream Road and 16 Patna Street and therefore I oppose the current outer residential zone for 76 Silverstream Road and 16 Patna Street and oppose the proposed Medium Density Residential Zone for the same locations.</p> <p>The proposal 290 is inconsistent with the Climate Change Response Act and in contradiction to Sections 5, 6 and 7 of the RMA.</p>	Disallow the submission in its entirety.
391	FS80.53	Oppose	Considers the Kāinga Ora submission requests many and extensive changes to the Proposed District Plan to increase densification, justified under broad and sweeping generalisations all with the implication 'so we can do our job'. Submitter opposes this submission in its entirety as well as in the specific areas we identified. Considers that most of the requested changes are narrowly focused on removing restrictions on development rather than creating an essential balance that considers multiple drivers of overall city, community and environmental wellbeing, while extending development beyond the scope of Medium Density Residential Standards and National Policy Statement on Urban Development and that required to meet growth targets.	Disallow
391	FS80.54	Oppose	Opposes all Kāinga Ora submission points that seek to remove design guides from the Proposed District Plan.	Disallow
391	FS80.55	Oppose	Opposes all Kāinga Ora submission points that seek proposed zone changes. The proposed zone changes would lead to a widespread increase in development that is not required, nor appropriate to managing the multiple drivers of overall city, community and environmental wellbeing.	Disallow
391	FS80.56	Oppose	Opposes all Kāinga Ora submission points that seek to remove 'amenity' from the Proposed District Plan.	Seeks to retain 'amenity' in the District Plan.

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391	FS82.1	Oppose	[No specific reason given beyond decision requested - refer to further submission]	Disallow
121	FS82.2	Oppose	[No specific reason given beyond decision requested - refer to further submission]	Disallow
70	FS82.3	Support	[No specific reason given beyond decision requested - refer to further submission]	Allow
389	FS86.1	Oppose	<p>Oppose Taranaki Whanui's request to remove the Open Space zoning which has been in place, uncontested by the owners, for at least 30 years. Considers that The current Open Space B zoning does not anticipate any built development and therefore there is no legal or reasonable expectation that there should be any development here.</p> <p>Oppose the removal of the Ridgelines and Hilltops overlay which has been in place since 2009, again uncontested. Considers that this reflects how highly visible the landscape is from all around the harbour, and that this has been acknowledged by expert landscape advice to Government.</p> <p>Oppose the removal of Special Amenity Landscape overlay. Considers that while this is a new restriction it is based on professional evidence to the Council and has been part of the proposed District Plan from the outset, again because of the visual prominence of the land.</p> <p>Oppose the removal of the Significant Natural Areas overlay. Considers that this reflects the natural biodiversity values of the area. It is particularly important because of the fantastic kaitiaki work that has been done, and all the investment of time, aroha and money, to remove predators from Miramar Peninsula, which is world leading work. Retaining this SNA overlay also fits with the proposed National Policy Statement on Indigenous Biodiversity which is intended to be gazetted shortly.</p> <p>Support the relevant parts of the submission of the Director General of Conservation supporting the maintenance and extension of significant natural areas. Consider that there is further work to do in respect of supporting landowners where significant natural areas are in residential areas, that is not the case here, and Andy Foster submits that the SNA status should remain. Again it is supported by expert assessment.</p> <p>[See original Further Submission for full reasoning].</p>	Disallow
374	FS86.5	Support	Supports submission as it supports the protection of our City's ridgelines and hilltops. [See original Further Submission for full reasoning].	Allow
142	FS86.6	Support	Supports submission as it supports the protection of our City's ridgelines and hilltops. [See original Further Submission for full reasoning].	Allow
189	FS86.7	Support	Supports submission as it supports the protection of our City's ridgelines and hilltops. [See original Further Submission for full reasoning].	Allow
298	FS86.8	Oppose	Opposes the request from PRL to rezone both parts of the site. Opposes the request from PRL to reorder the Ridgeline and Hilltops Policies and Rules. [See original Further Submission for full reasoning].	Disallow

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350	FS87.1	Support	<p>Supports the Retirement Villages Association of New Zealand Incorporated’s primary submission on the Plan Change relating to the use and development of retirement villages and associated infrastructure in the district in full, to the extent it is not inconsistent with the relief sought by Metlifecare. This is because the submission recognises the importance of, and practical realities of, developing land for retirement villages and associated infrastructure in the district. Considers the amendments sought also ensure that the Proposed Plan achieves the following outcomes:</p> <ul style="list-style-type: none"> - will give effect to the objectives and policies of the NPS UD; - will contribute to well-functioning urban environments; - promote the sustainable management of physical resources and the purpose and principles of the RMA; - is consistent and clear; - recognises the crucial role that retirement and aged care facilities have in providing for the health and wellbeing of the New Zealand community and the provision of housing for elderly residents; - will meet the requirements to satisfy the criteria of section 32 of the RMA; - recognises and provides for the differing functional and operational needs of retirement villages; - will meet the reasonably foreseeable needs of future generations; and - represent good resource management practice. 	Allow
472	FS100.22	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters’ original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won’t and can’t lead to ‘affordable housing’ because of the need to maximise profit - see post ‘Affordable housing for Dummies’</p> <p>Housing must be ‘affordable’. Wants ‘affordable housing’ for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren’t lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. ‘We would have built housing but we weren’t allowed’. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

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157	FS100.23	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow
398	FS100.24	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

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138	FS100.25	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow
410	FS100.26	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

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234	FS100.27	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow
378	FS100.28	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

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133	FS100.29	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow
490	FS100.30	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

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422	FS100.31	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow
394	FS100.32	Oppose	<p>The submission is based on the desire for housing and that is seen as a simple case of demand and supply. More supply will mean more housing and an assumption it will be affordable. The further submitters' original submission shows this is simply not the primary way how the market works to price goods and services. Just building more won't and can't lead to 'affordable housing' because of the need to maximise profit - see post 'Affordable housing for Dummies'</p> <p>Housing must be 'affordable'. Wants 'affordable housing' for all.</p> <p>The current case of hundreds and hundreds of empty rentals throughout Wellington (low tourist numbers and student numbers) but prices aren't lower. They hold them empty. The tax system supports them able to do this by allowing losses. These are the real issues that will help bring affordable housing.</p> <p>A lie has been told. Developers told stories of their poorly designed and ill considered developments being held back by local complaints and heritage. 'We would have built housing but we weren't allowed'. But good developments were allowed!</p> <p>There are key problems. Change zoning laws so that more mid-rise can be build in the commercial areas And businesses land banking by underutilising their sites in central wellington. Require them to have residential above them. There are other things as well.</p> <p>The whole submission should be disallowed as it is part of a template submission from Coalition for more homes.</p>	Disallow

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
374	FS109.1	Support	<p>Considers that the WCC’s Ridgelines and Hilltops Overlay (RHO) was adopted as part of Plan Change 33 following due public processes in the expectation that it would be applied across the city. Any departure from or changes to this policy by WCC must necessarily require full plan change processes to be followed and public consultation to occur.</p> <p>Considers that the entire purpose of the RHO is to protect these areas from encroachment by the current ‘issues of the day’ without full consideration of the impacts on other values. As GPA point out “Furthermore, Para 3.3.7 Sub clause 3 (Appendix 2) implies that, if Council wishes to declare an area within the Ridgelines and Hilltops Overlay as defined by the existing District Plan (DPC33) as a (medium density) housing area (MDHA), then Council must change the relevant provision of the District Plan, ie modify DPC33 by following the proper procedures for such a change, not just ignore it.” Considers that any attempt to use the Medium Density Residential Standards to justify not meeting the RHO requirements is flawed and the adoption of the RHO must of necessity require a full and public consultation process.</p> <p>Wellington City Council and its elected members are Trustees of the Wellington Town Belt along with the Citizens of Wellington, and party to the provisions contained in the Wellington Town Belt Management Plan as adopted by the Council. This Plan incorporates the requirements of the Ridgelines and Hilltops Overlay, and failure to follow this plan would appear to be in violation of the Trustees obligations, and the Wellington Town Belt Act.</p> <p>[Refer to Further submission for full reason]</p>	Allow

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
401	FS109.2	Support	<p>Supports original submission as it illustrates the importance of the protection the RHO provides for the Mt Victoria ridgeline, and the value that the citizens of Wellington place on the Town Belt, including the highly visible Mt Victoria precinct.</p> <p>Considers that there is a need to protect the already depleted Town Belt will become increasingly important to the citizens of Wellington in the face of intensification of housing as envisaged under the NPS-UD. The significant impact and value of open space on the wellbeing of citizens is globally recognised and in the interests of the health and well-being of current and future citizens the rezoning of 22 Alexandra Road must be halted.</p> <p>Considers that the Town Belt Management Plan and the Wellington Town Belt Act 2016 clearly articulate the need and intention to protect 22 Alexandra Road as part of the Wellington Town Belt and the intention to acquire 22 Alexandra Road for inclusion in the Town Belt if the opportunity arises.</p> <p>Friends of the Wellington Town Belt submit that the use of the NPS – Urban Development as justification for rezoning 22 Alexandra Road from Open Space C to residential cannot be supported as the very specific provisions relating to the land and the legal protections inherent in the Town Belt Act and the Town Belt Management Plan take precedence and over-ride the general provisions of the NPS-UD.</p> <p>[Refer to Further submission for full reason]</p>	Allow
410	FS109.3	Support	<p>Supports the view importance of the green ridgeline is so important as a backdrop to the built environment of our city and the value of such areas for the health and wellbeing of the citizens and residents.</p> <p>Considers that in an increasingly urbanised environment, open green space becomes critical to the wellbeing of the citizens and residents. Greenspace also become increasingly important in the fight against climate change as green space has been shown to reduce temperatures in urban areas, thus reducing adverse impacts on residents health and damage to infrastructure.</p> <p>[Refer to Further submission for full reason]</p>	Allow
342	FS109.4	Support	<p>Supports the MVRA submission which stresses the importance of protecting as much of the highly valued and iconic townscape of suburban housing blending into the 'soft fringes' of the Town Belt as possible. Considers that this valuable resource must be retained for the wellbeing of the citizens of Wellington.</p> <p>[Refer to Further submission for full reason]</p>	Allow

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
123	FS109.5	Support	<p>Supports the VUWSA submission. The land at 22 Alexandra Road forms a significant and iconic ridgeline directly above the city. The Town Belt is a Special Amenity Area Landscape and the property forms an integral part of the landscape and skyline.</p> <p>Considers that the values of the open space in the face of intensification of building elsewhere in the city only increases. Considers that while the NPS-UD supports intensification of housing development, this cannot be at the expense of other values also covered by National Policy Statements such as the NPS for Biodiversity and the country's addressing of Greenhouse gas emissions.</p> <p>Considers that proposing to (inappropriately) rezone that land as residential clearly signals that the land is to be built upon. The location of the land would suggest that any development would be high value and most likely endeavouring to maximise coverage and financial returns for the landowner. This high cost development will do little or nothing to alleviate the city's need for low to medium cost housing and instead will remove another iconic and much treasured piece of the Town Belt for private benefit, whilst continuing to diminish the area of the Town Belt that remains of the original vision.</p> <p>[Refer to Further submission for full reason]</p>	Allow
391	FS111.210	Oppose	<p>Considers that the notified mapping extent of the Character precincts is too small to adequately protect sites within heritage suburbs from inappropriate subdivision or development under s.6 of the RMA. Considers that the character (or "heritage") precincts must be enlarged, or otherwise protected, to achieve that objective.</p>	Disallow
271	FS112.37	Oppose	<p>WCCERG do not disagree with the request to move Horokiwi to the Special Purpose Quarry zone, in principle. However, the current requirements for Special Purpose Quarry Zone, (see Rules: Land use activities in the Quarry Zone) repeats the directive in every section that, "Notification status: An application for resource consent made in respect of rule (e.g., QUARZ-R3.1) is precluded from being publicly notified."</p> <p>WCCERG strongly disagree with this approach. Any changes to quarrying and mining within the jurisdiction of the WCC that suggests expansion or new developments must be publicly notified so that the public has an opportunity to judge whether the proposals meet the community criteria for climate change and biodiversity impacts, and whether alternative climate-safe and circular economy solutions have been investigated (either by the clients of quarrying and mining industries, or WCC itself).</p>	<p>Seeks that Wellington City Council remove the following directives from the whole of the Special Purpose Quarry Zone:</p> <p>"Notification status: An application for resource consent made in respect of rule (e.g., QUARZ-R3.1) is precluded from being publicly notified."</p> <p>And replace them with the following: "Notification status: An application for resource consent made in respect of rule (e.g., QUARZ-R3.1) must be publicly notified."</p>
290	FS115.1	Oppose	<p>The green area above Silverstream Road to the North East, and above Ngaio to the North West, is a beautiful area of regenerating native bushland. It features several small waterways, and the environment as it is enjoyed by many Wellington residents from the nearby suburbs and from further away around the city, including both children and adults. Kaka from the Zealandia sanctuary have been spending increasing amounts of time in the Crofton Downs and Ngaio suburbs due to this bushland, and signs erected within the bushland suggest some Kaka are even nesting there. Further Submitter grew up in Crofton Downs, and many of their family still live in that area and feel a strong connection with these hills, the bushland, and the streams. Hope future generations will also be able to collectively and freely experience the joy of exploring undisturbed bushland and the wildlife within it across the entirety of the area Submission 290 proposes to develop.</p>	<p>Seeks that Wellington City Council reject any moves to develop housing or other buildings or infrastructure in the area described in section 2.1 of submission 290. This includes felling any existing trees and bush. Acknowledging the housing challenges in Wellington City, Suggest the Council direct developers including the submitter 290 towards densification projects rather than increasing urban sprawl, decreasing green areas, and constructing new reservoirs.</p>

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391	FS119.1	Oppose	Opposes submission as Mt Victoria North Townscape precinct has very significant amenity and cultural value to Wellington City and ought to be retained. This precinct does fulfil the matters of national importance as set out under section 6(f) and the requirements under section 177 L and 77 R of the RMA, to meet the threshold to be applied as a qualifying matter to restrict height and density.	Disallow
290	FS120.1	Support	Support and agree with the overall intent of the submission which will achieve a clear delineation between environmental outcomes (i.e. residential development and special amenity landscapes) and provide access and linkages to spaces identified as Natural Open Space Zone. The submission recognises the strategic importance of providing community infrastructure and housing on the basis that the appropriate planning framework is applied over the submitters land. Accepting the submission gives the best chance at securing land and open space networks for the community.	Allow the submission in its entirety.
290	FS121.1	Support	Support and agree with the overall intent of the submission which will achieve a clear delineation between environmental outcomes (i.e. residential development and special amenity landscapes) and provide access and linkages to spaces identified as Natural Open Space Zone. The submission recognises the strategic importance of providing community infrastructure and housing on the basis that the appropriate planning framework is applied over the submitters land. Accepting the submission gives the best chance at securing land and open space networks for the community.	Allow the submission in its entirety.
182	FS123.1	Support	Considers the submission is an indepth, well though out analysis of what protection is needed for the last 200 years of Wellington's physical history for this city to remain a connected, beautiful and aware place in which to live. Considers that even earlier history needs to be much enhanced and also protected.	Allow submission in its entirety.
154	FS123.2	Support	Considers the submission is a carefully thought out consideration including how little difference adequate protection of wider character areas would make to the number of extra residences needed over the next 30 years in Wellington.	Allow submission in its entirety.
493	FS123.3	Support	Considers the submission is an excellent analysis of the Lower Kelburn area from deep knowledge and contribution to the area, incuding much vegetation planting and tending.	Allow submission in its entirety.
135	FS126.280	Not specified	Ryman supports in part where Design Guides are to be deleted as it is consistent with Ryman's primary submission, which sought to expressly exclude retirement villages from having to apply the Design Guides, as they have substantially different operational and functional needs.	Allow the submission points regarding deletions, subject to the relief sought by Ryman.
63	FS126.281	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with the NPSUD's removal of minimum car parking requirements.	Disallow
135	FS128.280	Not specified	Ryman supports in part where Design Guides are to be deleted as it is consistent with Ryman's primary submission, which sought to expressly exclude retirement villages from having to apply the Design Guides, as they have substantially different operational and functional needs.	Allow the submission points regarding deletions, subject to the relief sought by Ryman.
63	FS128.281	Oppose	Ryman oppose the relief sought in this submission as it is inconsistent with the NPSUD's removal of minimum car parking requirements.	Disallow
297	FS129.15	Support	Further submitter is an active member of and volunteer for Manawa Karioi Society which works with Tapu-te-Ranga Trust in managing the bush areas of their property as one of Wellington City's oldest environmental restoration projects. Further submitter support the endeavours of the Trust in their activities and recognises that environmental restoration such as undertaken by Manawa Karioi can be complementary to the economic, social and cultural aspirations of the Trust for the benefit of all.	Allow

Further Submissions Against Whole Original Submissions

Original Sub No / Point No	Further Sub No / Point No	Position	Summary of Submission	Decisions Requested
456	FS129.16	Support	Support submission points made by a significant number of individuals and groups that essentially support the same proposition "Reinstate the overlay of all properly delineated SNAs or part SNAs on all relevant residential zoned properties".	Allow
135	FS133.1	Support	The McIndoe Urban submission raises similar issues to those raised by the Stratum Management submission. It provides a comprehensive analysis of the Centres and Mixed Use design guide that addresses, in detail, similar concerns as those raised by Stratum. Stratum Management support the relief sought by the McIndoe Urban submission.	Allow the submission in its entirety.
242	FS134.1	Support	Not specified.	Allow the submission in its entirety.
443	FS134.2	Support	Not specified.	Allow the submission in its entirety.
364	FS134.3	Support	Not specified.	Allow the submission in its entirety.
231	FS134.4	Support	Not specified.	Allow the submission in its entirety.
305	FS134.5	Support	Not specified.	Allow the submission in its entirety.
209	FS135.1	Support	Not specified.	Allow the submission in its entirety.
443	FS135.2	Support	Not specified.	Allow the submission in its entirety.
364	FS135.3	Support	Not specified.	Allow the submission in its entirety.
231	FS135.4	Support	Not specified.	Allow the submission in its entirety.
305	FS135.5	Support	Not specified.	Allow the submission in its entirety.
154	FS135.6	Support	Not specified.	Allow the submission in its entirety.