

# **Section 32 Evaluation Report**

## **Part 2: City Centre Zone, Special Purpose Waterfront Zone, Special Purpose Stadium Zone and Te Ngākau Civic Square Precinct**

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## Acronyms:

<b>GWRC</b>	Greater Wellington Regional Council
<b>NPS-UD</b>	National Policy Statement on Urban Development
<b>CCZ</b>	City Centre Zone
<b>STADZ</b>	Special Purpose Stadium Zone
<b>WFZ</b>	Special Purpose Waterfront Zone
<b>Te Ngākau</b>	Te Ngākau Civic Square Precinct
<b>RPS</b>	Regional Policy Statement

<b>RMA</b>	Resource Management Act
<b>NES</b>	National Environmental Standard
<b>NZCPS</b>	New Zealand Coastal Policy Statement
<b>CCSV</b>	Central City Spatial Vision
<b>GNP</b>	Green Network Plan
<b>ODP</b>	Operative District Plan
<b>PDP</b>	Proposed District Plan
<b>DDP</b>	Draft District Plan
<b>CAUDG</b>	Central Area Urban Design Guide
<b>SGDP</b>	Second Generation District Plans
<b>COC</b>	City Outcomes Contribution
<b>CCC</b>	Christchurch City Council
<b>PCC</b>	Porirua City Council
<b>KCDC</b>	Kapiti Coast District Council
<b>MDC</b>	Masterton District Council
<b>HDC</b>	Horowhenua District Council
<b>SWDC</b>	South Wairarapa District Council
<b>MHUD</b>	Ministry of Housing and Urban Development
<b>AC</b>	Auckland Council
<b>HCC</b>	Hamilton City Council
<b>TCC</b>	Tauranga City Council
<b>DCC</b>	Dunedin City Council
<b>AUP</b>	Auckland Unitary Plan
<b>HUCC</b>	Hutt City Council
<b>UHCC</b>	Upper Hutt City Council
<b>OTDP</b>	Operative Tauranga District Plan
<b>OHDP</b>	Operative Hamilton District Plan
<b>OCDP</b>	Operative Christchurch District Plan
<b>PDDP</b>	Proposed Dunedin District Plan
<b>WCC</b>	Wellington City Council
<b>Council</b>	Wellington City Council

<b>LGWM</b>	Let's Get Wellington Moving
<b>GIS</b>	Geographic Information Systems
<b>TRP</b>	Technical Review Panel
<b>PSR</b>	Parks, Sport and Recreation team

# Section 32 Evaluation Report

## Part 2: City Centre Zone, Special Purpose Waterfront Zone, Special Purpose Stadium Zone and Te Ngākau Civic Square Precinct

### 1.0 Overview and Purpose

#### 1.1 Introduction to the resource management issue/s

This section 32 evaluation report is focussed on the City Centre Zone (CCZ) including Te Ngākau Civic Square Precinct (Te Ngākau), the Special Purpose Waterfront Zone (WFZ) and the Special Purpose Stadium Zone (STADZ). Containing Wellington's primary commercial, employment, events and waterfront areas, these zones entail a mixture of environments including high rise development, a waterfront promenade, a civic square and a landmark Stadium building.

The purpose of the CCZ is to enable and reinforce the continued primacy of the Wellington central city area as the principal commercial and employment centre servicing the city and metropolitan region. It is also a major employment hub for the region and contains a vibrant and diverse mix of inner city living, entertainment, educational, government and commercial activity.

Located in the heart of the CCZ, the purpose of Te Ngākau is to provide for civic activities, functions, areas of open space and redevelopment of the precinct while ensuring that any future development respects the special qualities of the area, including the concentration of listed heritage buildings. The Proposed District Plan's (PDP) Te Ngākau Civic Square Precinct (Te Ngākau) presents a shift away from the ODP's approach. The ODP's Civic Square Heritage Area has been removed and replaced with a new precinct approach, consistent with the approved Te Ngākau Civic Precinct Framework.

The purpose of the WFZ is to provide an interface between the city centre and Te Whanganui-a-Tara. It caters to a variety of cultural, recreation and entertainment activities and includes buildings such as Museum of New Zealand Te Papa Tongawera and Te Wharewaka o Pōneke along with residential apartment living. The proposed WFZ also largely reflects the Operative District Plan (ODP) Central Area Zone approach for the Lambton Harbour Area. Council uses the Wellington Waterfront Framework to help manage the waterfront in its role as property owner and manager of the land and public assets. The WFZ has continued the focus on protecting public open spaces and ensuring high-quality public spaces and buildings.

Adjacent to the CCZ and the WFZ, the purpose of the STADZ is to enable the continuing use, operation, and development of the Wellington Regional Stadium in a way that provides for its role as a multi-purpose stadium facility catering to a wide range of events. Wellington Regional Stadium is a landmark building at the entrance to the city and highly visible within the cityscape due to its size, function, and prominence. The proposed STADZ reflects the approach of the ODP Central Area Zone for the Stadium. The ODP provisions have been found to still be largely fit for purpose.

To support the intensification outcomes sought by the National Policy Statement on Urban Development (NPS-UD), Wellington City's Spatial Plan and Wellington's compact urban form objectives, an increase in the scale and intensity of development is enabled across the CCZ. This includes stronger, more targeted objectives and policies, a more enabling rule framework,

and building height, density and urban form standards tailored to maximise development capacity to accommodate projected growth.

## 2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Report	Relationship to this topic
Part 1: Context to s32 evaluation and evaluation of proposed Strategic Objectives	Contains an overview of the PDP background and policy approach including the District Plan response to the requirements of the National Policy Statement on Urban Development. It also provides an evaluation of the Strategic Direction chapter of the PDP.
Transport	Contains provisions relating to transport matters, including traffic generation, micro-mobility parking and site access.
Earthworks	Contains provisions relating to earthworks.
Subdivision	Contains provisions relating to the subdivision process including zone specific requirements relating to natural hazards, coastal environment and coastal margins occupied by the CCZ, STADZ and WFZ.
Infrastructure	Contains provisions relating to the protection and management of significant infrastructure assets in the CCZ, WFZ and STADZ, including natural gas, three waters assets, electricity distribution, and the national grid.
Natural Hazards	Contains provisions relating to the avoidance/mitigation of natural hazards, noting that the Wellington Fault line runs through the zone and that area is subject to Low to High Coastal Tsunami Hazards, Medium and High Coastal Inundation Hazards, Ponding Areas, Liquefaction Hazard Overlay and Overland Flow Paths.
Viewshafts	Contains provisions relating to the protection of viewshafts in the CCZ and WFZ, including the construction of verandahs and new buildings within viewshafts.
Signs	Contains specific provisions relating to the scale, number, illumination, motion and placement of signs in the CCZ, WFZ and STADZ to ensure they are compatible with their location.
Noise	Contains specific controls in relation to noise, including effects standards.
Historic Heritage and Sites and Areas of Significance to Māori	Contains provisions relating to historic heritage buildings and sites, archaeological sites and sites and areas of significance to Māori, noting in particular the concentration of historic heritage buildings within the CCZ and WFZ, as well as dispersant of Māori sites and areas within the City Centre and especially along the Waterfront.
Temporary Activities	Contains provisions to both enable temporary activities and manage their effects. The CCZ, STADZ and WFZ host the majority of temporary activities within the City.

Residential Zones, Open Space Zones and Character Precincts	The provisions of the CCZ and WFZ seek to manage effects on adjacent residential and open space zoned areas, via controls on height in relation to boundaries and sunlight access controls, for example.
Metropolitan Centre Zone, Local Centre Zone, Neighbourhood Centre Zone and Mixed Use Zone	The CCZ sits at the top of the centres hierarchy in the Proposed Plan, with the Metropolitan Centre Zone, Local Centre Zone and Neighbourhood Centre Zone sitting underneath the CCZ in the hierarchy. These zones are subject to a separate S32 evaluation report. Note also, that the 'Part 1' report referred to at the top of this table provides an evaluation of the centres hierarchy underpinning the PDP's approach to centres' planning.  The CCZ abuts the Mixed Use Zone in the Kaiwharawhara area.
Coastal Environment	Activities and developments in the CCZ, WFZ and STADZ may be subject to the provisions of the Coastal Environment Chapter, where Coastal Environment and coastal margin overlays also apply.
Wind	The CCZ is comprised of tall buildings and structures which have the potential to create wind effects for pedestrians and public space users. This is the same for the WFZ, albeit development is of a more reduced height. Provisions in the Wind chapter therefore apply to both the CCZ and the WFZ.
Designations	Sites in the CCZ and WFZ are subject to the provisions of the Designations Chapter.

### 3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the Proposed District Plan that are relevant to this issue/topic are:

<b>AW-04</b>	<b><i>Anga whakamua – Moving into the future</i></b>
<i>The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.</i>	
<b>CC-01</b>	<b><i>Capital City</i></b>
Wellington City continues to be the primary economic and employment hub for the region.	
<b>CC-02</b>	<b><i>Capital City</i></b>
Wellington City is a well-functioning Capital City where: <ol style="list-style-type: none"> <li>1. A wide range of activities that have local, regional and national significance are able to establish.</li> <li>2. Current and future residents can meet their social, cultural, economic and environmental wellbeing.</li> <li>3. Mana whenua values and aspirations are visible, celebrated and an integral part of the City's identity.</li> <li>4. Urban intensification is delivered in appropriate locations and in a manner that supports future generations to meet their needs.</li> <li>5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted.</li> </ol>	



6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.	
<b>CC-03</b>	<b><i>Capital City</i></b>
Development is consistent with and supports the achievement of the following strategic City goals:	
<ol style="list-style-type: none"> <li>1. Compact: Wellington builds on its existing urban form with quality development in the right locations.</li> <li>2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design.</li> <li>3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy.</li> <li>4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets.</li> <li>5. Greener: Wellington is sustainable and its natural environment is protected, enhanced and integrated into the urban environment.</li> <li>6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</li> </ol>	
<b>CEKP-01</b>	<b><i>City Economy, Knowledge and Prosperity</i></b>
A range of commercial and mixed use environments are provided for in appropriate locations across the City to:	
<ol style="list-style-type: none"> <li>1. Promote a diverse economy;</li> <li>2. Support innovation and changes in technology; and</li> <li>3. Facilitate alternative ways of working.</li> </ol>	
<b>CEKP-02</b>	<b><i>City Economy, Knowledge and Prosperity</i></b>
The City maintains a hierarchy of centres based on their role and function, as follows:	
<ol style="list-style-type: none"> <li>1. City Centre – the primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily accessible and easy to navigate for all and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs;</li> <li>2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre;</li> <li>3. Local Centres – these centres service the surrounding residential catchment and neighbouring suburbs. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City's public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more housing with enablers of growth such as walkable access to public transport, and community facilities and services; and</li> </ol>	

4. Neighbourhood Centres - these centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day needs. These centres are generally for small commercial clusters and community services. Neighbourhood Centres are accessible by public transport and active transport modes.	
<b>CEKP-04</b>	<b><i>City Economy, Knowledge and Prosperity</i></b>
Land within the City Centre, Centres, Mixed Use, and General Industrial Zones is protected from activities that are incompatible with the purpose of the zone or have the potential to undermine the City's hierarchy of centres	
<b>CEKP-05</b>	<b><i>City Economy, Knowledge and Prosperity</i></b>
Strategically important assets including those that support Māori culture, tourism, trade education, research, health are provided for in appropriate locations.	
<b>HHSASM-01</b>	<b><i>Historic Heritage and Sites and Areas of Significance to Māori</i></b>
Significant buildings, sites, areas, places and objects that exemplify Wellington's historical and cultural values are identified, recognised and protected.	
<b>HHSASM-02</b>	<b><i>Historic Heritage and Sites and Areas of Significance to Māori</i></b>
Heritage buildings are resilient and have a sustainable long term use while ensuring their heritage and cultural values are recognised and maintained.	
<b>HHSASM-03</b>	<b><i>Historic Heritage and Sites and Areas of Significance to Māori</i></b>
The cultural, spiritual and/or historical values associated with sites and areas of significance to Māori are protected.	
<b>NE-01</b>	<b><i>Natural Environment</i></b>
The natural character, landscapes and features, and ecosystems that contribute to the City's identity and have significance for mana whenua as kaitiaki are identified, recognised, protected, and, where possible, enhanced.	
<b>NE-02</b>	<b><i>Natural Environment</i></b>
Future subdivision and development is designed to limit further degradation of the City's water bodies, and recognises mana whenua and their relationship to water (Te Mana o Te Wai).	
<b>SCA-02</b>	<b><i>Strategic City Assets and Infrastructure</i></b>
New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development: <ol style="list-style-type: none"> <li>1. Can meet the development infrastructure costs associated with the development, and</li> <li>2. Supports a significant increase in development capacity for the City.</li> </ol>	
<b>SCA-03</b>	<b><i>Strategic City Assets and Infrastructure</i></b>
Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.	

<b>SRCC-01</b>	<b><i>Sustainability, Resilience and Climate Change</i></b>
The City's built environment supports: <ol style="list-style-type: none"> <li>1. A net reduction in the City's carbon emissions by 2050;</li> <li>2. More energy efficient buildings; and</li> <li>3. An increase in the use of renewable energy sources.</li> </ol>	
<b>SRCC-02</b>	<b><i>Sustainability, Resilience and Climate Change</i></b>
Natural hazard risks are identified, planned for, mitigated, and, where necessary, avoided.	
<b>SRCC-03</b>	<b><i>Sustainability, Resilience and Climate Change</i></b>
Development and land use activities: <ol style="list-style-type: none"> <li>1. Manage the risks associated with climate change and sea level rise effectively: and</li> <li>2. Support the City's ability to adapt over time to the impacts of climate change and sea level rise.</li> </ol>	
<b>UFD-01</b>	<b><i>Urban Form and Development</i></b>
Wellington's compact urban form is maintained with the majority of urban development located within the City Centre, in and around Centres, and along major public transport corridors.	
<b>UFD-03</b>	<b><i>Urban Form and Development</i></b>
Medium to high density and assisted housing developments are located in areas that are: <ol style="list-style-type: none"> <li>1. Connected to the transport network and served by multi-modal transport options; or</li> <li>2. Within or near a Centre Zone or other area with many employment opportunities; and</li> <li>3. Served by public open space and other social infrastructure.</li> </ol>	
<b>UFD-04</b>	<b><i>Urban Form and Development</i></b>
Sufficient, feasible land development capacity is available to meet the short, medium, and long-term housing and business land needs of the City as identified in the Wellington Regional Housing and Business Capacity Assessment – Chapter 2 Wellington City.	
<b>UFD-05</b>	<b><i>Urban Form and Development</i></b>
A variety of housing types, sizes and tenures, including assisted housing and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.	
<b>UFD-06</b>	<b><i>Urban Form and Development</i></b>
A variety of housing types, sizes and tenures, including assisted housing, supported residential care, and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.	
<b>UFD-07</b>	<b><i>Urban Form and Development</i></b>
Areas of identified special character are recognised and new development within those areas is responsive to the context and, where possible, enhances that character.	

An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report. It is noted that a number of the objectives forming part of the Plan's Strategic Direction and referenced above inform the CCZ, WFZ, STADZ and Te Ngākau provisions but relate more directly to significant and special areas and values. As the genesis for those

provisions lie in other topics (e.g., landscape, natural character, heritage) they are also referenced in the relevant s32 Evaluation Reports relating to those topics.

## 4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management 'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

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

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

### 4.1 Section 6

The s6 matters relevant to this topic are:

Section	Relevant Matter
Section 6 (a)	<p><i>The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:</i></p> <p>A portion of the CCZ and the entirety of the STADZ and WFZ are located within the coastal environment.</p>
Section 6 (d)	<p><i>The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:</i></p> <p>Public access to the coastal marine area is enabled through the Public Access chapter in the PDP. The CCZ, STADZ and WFZ enable un-restricted public access to, along and adjacent to the coastal marine area.</p>
Section 6 (e)	<p><i>The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:</i></p> <p>Numerous sites and places across CCZ, WFZ and STADZ have long traditional, historical, cultural, and spiritual associations and more recent development interests for mana whenua of Te Whanganui ā Tara (Wellington), Taranaki Whānui and Ngāti Toa Rangatira, for example Whairepo Lagoon.</p> <p>Taranaki Whānui and Ngāti Toa Rangatira are acknowledged as the mana whenua of Te Whanganui ā Tara (Wellington) and their cultural associations,</p>

	and landowner and development interests are recognised in planning and developing the CCZ and WFZ.
Section 6 (f)	<p><i>The protection of historic heritage from inappropriate subdivision, use, and development:</i></p> <p>Several heritage buildings, heritage structures and heritage areas are located within the CCZ, WFZ, including within Te Ngākau. Both the CCZ and WFZ seek to effectively manage the adverse effects of activities and development at interfaces with heritage buildings, structures and areas.</p> <p>Te Ngākau precinct seeks to ensure building design respects the form, scale and style of heritage buildings and wider architectural elements within the precinct, including interface treatment with the Town Hall. The CCZ also provides an adjoining site-specific building height to manage development adjoining Residentially Zoned heritage areas. Heritage has been considered through the development of the Historic Heritage Section 32 evaluation report.</p>
Section 6 (h)	<p><i>The management of significant risks from natural hazards.</i></p> <p>The CCZ, WFZ and STADZ are subject to the following natural hazards:</p> <ul style="list-style-type: none"> <li>• Medium and High Coastal Inundation Hazards;</li> <li>• Low, Medium and High Coastal Tsunami Hazards;</li> <li>• The Wellington Fault overlay runs through CCZ zoned Thorndon Quay;</li> <li>• Flood Hazard overlays – Inundation Areas, Overland Flowpaths and Stream Corridors; and</li> <li>• Liquefaction Hazard overlay.</li> </ul> <p>The CCZ and WFZ provisions seek that development responds to identified significant natural hazards risks, including the strengthening of existing buildings and requiring new buildings to be resiliently designed.</p> <p>The CCZ, WFZ, STADZ and Te Ngākau Precinct provisions support a resilient urban environment that effectively adapts and responds to natural hazard risks.</p>

#### 4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
Section 7(b)	<p><i>The efficient use and development of natural and physical resources</i></p> <p>This matter is relevant given the importance of efficiently utilising the physical resource of the existing CCZ, WFZ and STADZ areas and is relevant to the requirement to maximise the development capacity and increased density from the NPS-UD for the CCZ. This is also relevant for protecting the natural resources within the CCZ and WFZ.</p>
Section 7(ba)	<p><i>the efficiency of the end use of energy</i></p> <p>Reflected in the CCZ, WFZ and Te Ngākau provisions that promote compact urban form, provide for public transport activities and building sustainability.</p>

Section 7(c)	<p><i>The maintenance and enhancement of amenity values</i></p> <p>The maintenance and enhancement of amenity values is integral to the CCZ, WFZ and STADZ. The CCZ and WFZ seeks to ensure development positively contributes to creating a high quality, well-functioning urban environment by providing a quality and level of public and private amenity that positively responds to anticipated growth, maintaining and enhancing public space and general amenity of surrounding environments.</p> <p>This is reinforced through sunlight protection controls for public spaces and residential amenity controls. The City Outcome Contribution (COC) mechanism is another means to enhance the amenity of the public realm.</p> <p>The STADZ manages development to ensure adverse effects on amenity values of adjacent sensitive activities are avoided, remedied and mitigated.</p>
Section 7(f)	<p><i>Maintenance and enhancement of the quality of the environment:</i></p> <p>Related to 7(c) above the proposed plan seeks to ensure that the quality of the residential and public environment is maintained within the CCZ, WFZ and Te Ngākau. The STADZ seeks to maintain the quality and amenity of surrounding environment through managing on-site effects. All zones and the Te Ngākau Precinct seek to manage adverse effects when development is adjacent to scheduled heritage items, including sites and areas of significance to Māori.</p>
Section 7(i)	<p><i>The effects of climate change</i></p> <p>The CCZ, Te Ngākau and WFZ contain provisions seeking that buildings respond to climate change effects, including the adaptive reuse of existing buildings, requiring new buildings to be resiliently designed and encouraging micro-mobility and public transport use and connections. Within the CCZ, the COC mechanism encourages development to incorporate a level of building performance that leads to reduced carbon emissions and increased climate change resilience. The STADZ encourages sustainable, seismically and climatically resilient buildings.</p>

#### 4.3 Section 8

Section 8 requires that in managing the use, development, and protection of natural and physical resources the principles of the Treaty of Waitangi are taken into account. In developing the CCZ, WFZ and STADZ provisions the Council has worked in partnership with Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira to actively protect their interests, particularly in relation to the recognition and protection of sites and areas of significance in the area.

In the CCZ and WFZ this also includes recognising and enabling mana whenua's cultural associations and landowner and development interests, including providing for the development of papakāinga, kaumātua housing and affordable Māori housing on their landholdings, and managing development adjoining sites of significance to Māori. The WFZ also provides a method regarding involvement of mana whenua in resource consents and private plan change processes. Te Ngākau and STADZ seek to ensure the cultural, spiritual and historical values and interests and associations of importance to mana whenua are recognised with regards to new development.

## 4.4 National Direction

### 4.4.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020 (NPS-UD)

The instrument/s and associated provisions relevant to this topic are:

NPS	Relevant Objectives / Policies
<p><i>NPS on Urban Development, 2020</i></p>	<p>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p> <p>Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p> <p>Policy 1: Contribution of planning decisions to well-functioning urban environments including <i>‘have or enable a variety of sites that are suitable for different business sectors in terms of location and site size’</i>.</p> <p>Policy 2: Tier 1 authorities (WCC is one), <i>‘at all times, provide at least sufficient development capacity to meet expected demand ... for business land over the short term, medium term, and long term’</i>.</p> <p>Policy 3: In Tier 1 urban environments, and more specifically in city centre zones, district plan enable <i>‘in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification’</i> and also <i>‘building heights of least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones’</i></p> <p>Policy 4: District plans applying to Tier 1 urban environments <i>‘modify the relevant building height or density requirements under Policy 3 only to the extent necessary ... to accommodate a qualifying matter in that area’</i>.</p> <p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to a number of matters.</p> <p>Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must meet consultation obligations.</p>

	Policy 10: Tier 1 local authorities must meet specific obligations to engage with other parties for the purposes of integrated planning.
<i>New Zealand Coastal Policy Statement, 2012</i>	<p>The following objectives and policies from the NZCPS are of relevance to the CCZ, WFZ and STADZ through their inclusion in the Coastal Environment:</p> <ul style="list-style-type: none"> <li>• Objective 3 (<i>'take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment'</i>)</li> <li>• Objective 4 (<i>'maintain and enhance the public open space qualities and recreation opportunities of the coastal environment'</i>)</li> <li>• Objective 5 (<i>'ensure that coastal hazard risks taking account of climate change, are managed'</i>)</li> <li>• Policy 2 (<i>'Treaty of Waitangi, tangata whenua and Māori heritage'</i>)</li> <li>• Policy 4 (<i>'integrated management of natural and physical resources'</i>)</li> <li>• Policy 6 (<i>'consolidation of urban areas', 'functional need'</i>),</li> <li>• Policy 17 (<i>'historic heritage protection'</i>)</li> <li>• Policy 18 (<i>'public open space'</i>)</li> <li>• Policy 19 (<i>'Walking access'</i>)</li> <li>• Policy 20 (<i>'vehicle access'</i>)</li> <li>• Policy 25 (<i>'subdivision, use and development in areas of coastal hazard risk'</i>)</li> <li>• Policy 27 (<i>'protecting significant existing development from coastal hazard risk'</i>).</li> </ul>

#### **4.4.2 Proposed National Policy Statements**

In addition to the five NPSs currently in force there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

Neither are relevant.

#### **4.4.3 National Environmental Standards**

In addition to the NPSs there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020



- NES for Storing Tyres Outdoors 2021

No NES are uniquely relevant where the PDP's provisions relating to the CCZ, WFZ, STADZ and Te Ngākau are concerned.

#### 4.4.4 National Planning Standards

The National Planning Standards provide for a range of zone options to be included in Part 3 – Area Specific Matters of the District Plan. This includes the City Centre Zone and Special Purpose Stadium Zone, the purpose of which are as follows:

Zone	Description
<i>Special Purpose Stadium Zone</i>	Areas used predominantly for the operation and development of large-scale sports and recreation facilities, buildings and structures. It may accommodate a range of large-scale sports, leisure, entertainment, art, recreation, and/or event and cultural activities.
<i>City Centre Zone</i>	Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region.

The National Planning Standards enable additional Special Purpose zones beyond those that they list in Table 4: District Plan structure. The National Planning Standards notes that any additional special purpose zone must only be created when the proposed land use activities or anticipated outcomes of the additional zone meet all the following criteria:

- a. are significant to the district, region or country
- b. are impractical to be managed through another zone
- c. are impractical to be managed through a combination of spatial layers.

The Wellington Waterfront, known under the ODP as 'Lambton Harbour Area', is significant on a district and regional level. The Wellington Waterfront is a modern taonga for Wellington City and the wider Wellington Region, created through reclamation, structures and encroachments into the harbour that are seaward of the original natural shoreline. It is highly significant for Wellington's identity, history, recreation and connectivity to the CCZ.

The Lambton Harbour Area is currently within the Central Area Zone of the ODP. With the introduction of the National Planning Standards and the special purpose zone tool, the Council considered that it would be impractical to manage the Waterfront through any other zone. The appropriateness of other zones is discussed in Section 7 of this report.

#### 4.5 National Guidance Documents

Document	Relevant provisions
<i>Understanding and implementing intensification provisions of the National Policy Statement on Urban Development</i> , MfE, ME 1529, September 2020	This guidance has been developed to help local authorities understand and interpret the provisions for intensification and in the NPSUD. Tier 1 local authorities are required to ensure that in city centre zones, building heights and density of the urban form realise as much development capacity as possible, to maximise benefits of intensification. Additionally building heights of at least

	6 storeys within a walking catchment of existing and planned rapid transit stops, the edge of city centre zones, and the edge of metropolitan centre zones must be enabled.
<i>Guidance on Housing and Business Development Capacity Assessments (HBAs) under the National Policy Statement on Urban Development</i> , MfE, ME 1551, December 2020	This guidance has been developed to help local authorities understand and interpret the provisions for producing a Housing and Business Development Capacity Assessment (HBA) under subpart 5 of the NPSUD.
<i>Evidence-based decision-making under the National Policy Statement on Urban Development</i> , MfE, ME 1550, December 2020	This guidance has been developed to help local authorities understand and interpret the provisions for evidence-based decision-making in subpart 3 of the NPSUD.
<i>National guidelines for crime prevention through environmental design in New Zealand</i> , Ministry of Justice (2005)	These guidelines outline how urban planning, design and place management strategies can reduce the likelihood of crime and deliver numerous social and economic benefits. All four principles and the seven qualities of well designed, safer places in the Guidelines are relevant to the Waterfront and City Centre.

#### 4.6 Regional Policy and Plans

##### Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for the CCZ, WFZ, STADZ and Te Ngākau contained in the RPS.

<b>Regional form, design and function</b>	
<b>Section</b>	<b>Relevant matters</b>
Objective 22	<p><i>A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:</i></p> <p><i>(a) a viable and vibrant regional central business district in Wellington city;</i></p> <p><i>(b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality;</i></p> <p><i>(c) sufficient industrial-based employment locations or capacity to meet the region's needs;</i></p> <p><i>(d) development and/or management of the Regional Focus Areas identified in the Wellington Regional Strategy ;</i></p> <p><i>(e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;</i></p> <p><i>(f) strategically planned rural development;</i></p> <p><i>(g) a range of housing (including affordable housing);</i></p>

	<p><i>(h) integrated public open spaces;</i></p> <p><i>(i) integrated land use and transportation;</i></p> <p><i>(j) improved east-west transport linkages;</i></p> <p><i>(k) efficiently use existing infrastructure (including transport network infrastructure); and</i></p> <p><i>(l) essential social services to meet the region's needs.</i></p>
<p>Policy 31: Identifying and promoting higher density and mixed use development – district plans</p> <p>M</p>	<p>Policy 31 requires district plans to:</p> <ul style="list-style-type: none"> <li>• Identify centres suitable for higher density development</li> <li>• Identify locations with good access to the strategic public transport network, suitable for higher density development</li> <li>• Include policies, rules and methods to encourage higher density development in these areas</li> </ul>
<p>Policy 54: Policy 54: Achieving the region's urban design principles – consideration</p> <p>M</p>	<p>Policy 54 requires district plans to have particular regard to achieving the region's urban design principles. The principles are set out in Appendix 2 to the RPS and include: context, character, choice, connections, creativity, custodianship, and collaboration.</p>
<p>Policy 57: Integrating land use and transportation – consideration</p> <p>R</p>	<p>Policy 57 requires district plans to have particular regard to achieving the key outcomes of the Wellington Land Transport Strategy. One of the key outcomes of the strategy is improved regional freight efficiency.</p> <p>The matters listed in Policy 57 include:</p> <p><i>(c) whether there is good access to the strategic public transport network;</i></p> <p><i>(d) provision of safe and attractive environments for walking and cycling; and</i></p> <p><i>(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for</i></p>
<b>Resource management with tangata whenua</b>	
<b>Section</b>	<b>Relevant matters</b>
Objective 23	<i>The region's iwi authorities and local authorities work together under Treaty partner principles for the sustainable management of the region's environment for the benefit and wellbeing of the regional community, both now and in the future.</i>
Objective 24	<i>The principles of the Treaty of Waitangi are taken into account in a systematic way when resource management decisions are made.</i>
Objective 25	<i>The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region's natural and physical resources.</i>

Policy 48: Principles of the Treaty of Waitangi – consideration  R	<i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to:</i>  <i>(a) the principles of the Treaty of Waitangi; and</i>  <i>(b) Waitangi Tribunal reports and settlement decisions relating to the Wellington region.</i>
Policy 49: Recognising and providing for matters of significance to tangata whenua – consideration  M	<i>When preparing a change, variation or review of a district or regional plan, the following matters shall be recognised and provided for:</i>  <i>(a) the exercise of kaitiakitanga;</i>  <i>(b) mauri, particularly in relation to fresh and coastal waters;</i>  <i>(c) mahinga kai and areas of natural resources used for customary purposes; and</i>  <i>(d) places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua.</i>
Policy 66: Enhancing involvement of tangata whenua in resource management decision-making – non-regulatory  R	<i>To enhance involvement of tangata whenua in resource management decision-making by improving opportunities for iwi authority representatives to participate in local authority decision-making.</i>
<b><i>Regulatory policies – direction to district and regional plans and the Regional Land Transport Strategy</i></b>	
<b><i>Section</i></b>	<b><i>Relevant matters</i></b>
Policy 30: Maintaining and enhancing the viability and vibrancy of regionally significant centres – district plans	District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the:  (a) Sub-regional centres of:  (i) Upper Hutt city centre;  (ii) Lower Hutt city centre;  (iii) Porirua city centre;  (iv) Paraparaumu town centre;  (v) Masterton town centre; and the  (b) Suburban centres in:  (i) Petone;  (ii) Kilbirnie; and

	(iii) Johnsonville
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*M = policies which must be implemented in accordance with stated methods in the RPS*  
*R = policies to which particular regard must be had when varying a district plan*

## Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2021

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to appeal.

The table below identifies the relevant provisions for CCZ, WFZ, STADZ and Te Ngākau contained in the Proposed Natural Resources Plan.

<b>Proposed Natural Resources Plan (Appeals version, 2021)</b>	
<b>Section</b>	<b>Relevant matters</b>
<i>Policy 9</i>	The intent of this policy is to maintain and enhance the extent or quality of public access to and along the coastal marine area except where it is necessary to protect sites with significant mana whenua values, historic heritage value, indigenous biodiversity value, or where necessary to protect public health and safety, or protect Wellington International Airport and Commercial Port Area security. Where it is necessary to permanently restrict or remove existing public access, the loss of public access shall be mitigated or offset by providing enhanced public access at a similar or nearby location to the extent reasonably practicable.
<i>Objective 14</i>	These objectives and policies focus on mauri, mana whenua relationships, Māori values and exercise of kaitiakitanga.
<i>Objective 15</i>	
<i>Policy 17</i>	
<i>Policy 18</i>	
<i>Policy 19</i>	
<i>Policy 20</i>	
<i>Objective 53</i>	This objective and policy enables the Lambton Harbour Area to use and redevelop existing structures.
<i>Policy 132</i>	
<i>Policy 134</i>	<i>The adverse effects of new use and development on public open space and visual amenity viewed within, to and from the coastal marine area shall be avoided, remedied or mitigated by:</i>

	<p>(a) <i>having particular regard to any relevant provisions contained in any bordering territorial authorities' proposed and/or operative district plan, and</i></p> <p>(b) <i>managing use and development to be of a scale, location, density and design which is compatible with the natural character, natural features and landscapes and amenity values of the coastal environment and the functional needs, operational requirements and locational constraints of the Commercial Port Area and the Wellington International Airport, and</i></p> <p>(c) <i>taking account of the future need for public open space in the coastal marine area.</i></p>
<i>Policy 139</i>	Where seawalls are appropriate.
<i>Objective 57</i>	Compatibility of use and development in the Lambton Harbour Area with its surroundings and the Central Area of Wellington City (now WFZ).
<i>Policy 142</i>	<p><i>When considering whether use and development of the Lambton Harbour Area is appropriate, have regard to the extent which it:</i></p> <p>(a) <i>provides for a range of activities appropriate to the harbour/city interface; and</i></p> <p>(b) <i>is compatible with the urban form of the city; and</i></p> <p>(c) <i>recognises where relevant, the heritage character, development and associations the wharf edges, reclamation edges, and finger wharves and their contribution to understanding and appreciation of the Lambton Harbour Area, and</i></p> <p>(d) <i>does not detract from the amenity of the area; and</i></p> <p>(e) <i>recognises that the Lambton Harbour Area is adjacent to the Commercial Port Area, which is a working port; and</i></p> <p>(f) <i>ensures that the development of noise sensitive activities is adequately acoustically insulated in order the manage reverse sensitivity effects; and</i></p> <p>(g) <i>enables social and economic benefits to Wellington City and the wider region; and</i></p> <p>(h) <i>provides for open space, pedestrian and cycle through routes and access to and from the water; and</i></p> <p>(i) <i>recognises mana whenua waka and waka ama uses and enables them to continue; and</i></p> <p><i>addresses provision, including design guides, contained in the Wellington City District Plan and any relevant proposed plan changes or variations, including the following matters: amenity values; noise and vibration; views, traffic; wind; lighting and glare; sunlight and shading; height, bulk and form; and urban design.</i></p> <p>Compatibility of use and development in the Lambton Harbour Area with its surroundings and the Central Area of Wellington City (now Waterfront Zone).</p>

#### 4.7 Iwi Management Plan(s)

There are no Iwi Management Plans relevant to this topic.

## 4.8 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

<i>Accessible Wellington: The Accessible Journey Action Plan, June 2019</i>	WCC	This plan acts as a guide to enhancing people's independence and ability to participate, engage in, and benefit from, key Council services.
<i>Adelaide Road – Planning for the Future: A long-term vision for future growth and development, November 2008</i>	WCC	The framework outlines a vision for the future growth and development of the Adelaide Road area and identifies goals and actions with a view to significant urban change over the next 20+ years to create a prosperous and high-quality mixed-use area.
<i>Central City Framework: Approach to Implementation, updated</i>	WCC	This framework aims to protect and enhance the central city, while also making improvements where they are needed in response to current and future challenges. Prepared under the framework of the Wellington Towards 2040: Smart Capital.
<i>Central City Spatial Vision, 2020</i>	WCC	<ul style="list-style-type: none"> <li>• The Central City Spatial Vision is a specific vision that guides the Spatial Plan for the Central City area. The vision statement is “A thriving, green capital city framed by the harbour and hills, composed of interconnected, cohesive neighbourhoods that support people to lead healthy lives”.</li> <li>• The vision aligns with the “Our City Tomorrow” goals: <ul style="list-style-type: none"> <li>○ Compact</li> <li>○ Inclusive and connected</li> <li>○ Resilient</li> <li>○ Greener</li> <li>○ Vibrant and prosperous.</li> </ul> </li> <li>• There are 5 city scale directions that are also set out: <ul style="list-style-type: none"> <li>○ Neighbourhoods, as a unit of scale within the city centre will be identified</li> <li>○ Connectors – the relationship of ‘place’ and ‘movement’ and how this contributes to the quality of the street.</li> <li>○ Greening – the waterfront is noted as a key open space that will be well connected to the central city.</li> <li>○ Anchors – strong, stable places that will have a constant presence in the city. They are already resilient, or are capable of being made to be, i.e. Te Papa.</li> <li>○ Areas of Change - places where comprehensive redevelopment will be actively encouraged.</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>• In summary, the CCSV: <ul style="list-style-type: none"> <li>○ Reinforces the role of the waterfront in the City's identity and character and in providing one of the largest areas of open space for the City</li> <li>○ Carries through the direction of the CCF in seeking to enhance the connections between the City and the waterfront</li> <li>○ Highlights the various uses along the waterfront (or in close proximity to the waterfront) which are seen to have longevity in this location and therefore play a key role in the City's social and physical resilience.</li> </ul> </li> </ul>
<i>Economic Development Strategy</i> , December 2011	WCC	The strategy provides a long-term economic vision for the City, with a primary focus is on priority areas to be progressed immediately to maximise the City's opportunities for economic growth.
<i>Let's Get Wellington Moving</i>	GWRC, WCC and, Waka Kotahi	A series of cross-agency transport-oriented initiatives under the umbrella of Let's Get Wellington Moving, including mass rapid transit planning, public transport information networks and safety improvements.
<i>Long-term Plan 2021 – 31</i> , adopted June 2021	WCC	The long-term plan sets the direction for the next 10 years, outlines what the Council will be investing in, how much it may cost and how this will be funded.
<i>Our Capital Spaces</i> , 2013	WCC	Provides guidance around the city's open spaces and recreation. The framework aims to get more people utilising the open spaces, including recreational and sport facilities, and being active, as well as preserving ecosystems and landscapes and detailing how Council will make decisions on these spaces from 2013-2023 and beyond.
Our City Tomorrow: He Mahere Mokowā mō Pōneke: A Spatial Plan for Wellington City - An Integrated Land Use and Transport Strategy, June 2021	WCC	<ul style="list-style-type: none"> <li>• The Spatial Plan is an integrated land use and transport strategy that sets the direction for how Wellington City will grow and change over the next 20-30 years</li> <li>• The Spatial Plan sets out key development outcomes for the city, including how additional housing capacity will be provided.</li> <li>• The CCZ and the WFZ in the PDP implement the strategic direction and outcomes set by the Spatial Plan.</li> <li>• The Stadium is detailed in the Spatial Plan as a major infrastructure and facility that contributes to the city's economic base, as well as being an anchor of resilience.</li> </ul>
Our Ten Year Plan: Draft Financial and	WCC	This strategy has been directly guided by the Wellington Towards 2040: Smart Capital (see below) and asset management plans. It aligns with the 10-year priorities that are the foundation



Infrastructure Strategy 2018 - 2048, undated		for the proposed 2018-28 Long-term Plan (see above), and underpins progress towards the City's vision and long-term city outcomes.
Te Atakura – First to Zero, June 2019	WCC	The blueprint sets Wellington's ambition to become a net zero carbon capital by 2050. Accompanied by an implementation plan adopted in August 2020.
Trading in Public Places Policy, adopted 2006, additions in 2014	WCC	The policy is to ensure that the public trading activities in Wellington City make public places more safe, lively and attractive without inhibiting the safety and efficiency of pedestrian movement.
Walking Policy, November 2008	WCC	The purpose of this policy is to provide a framework for initiatives to collaboratively improve the pedestrian walking environment in Wellington.
Wellington Resilience Strategy, March 2017	WCC	This strategy sets out a blueprint to enable Wellingtonians to better prepare for, respond to, and recover from disruptions. Outlines a vision and goals to drive a series of strategic projects designed to shape the future City, such as adapting the City to the effects of sea level rise, and integrating recovery planning for inevitable earthquake strikes.
Wellington Towards 2040: Smart Capital	WCC	A strategy for Wellington that is supported by four city goals: 1) people-centred city, 2) connected city, 3) eco-city, 4) dynamic central city. Each of the city goals is associated with priority outcomes for Wellington to achieve.
Wellington Regional Growth Framework 2021	GWRC, WCC, PCC, KCDC, HUCC, UHDC, HDC, MDC, SWDC, MHUD	<ul style="list-style-type: none"> <li>The Regional Growth Framework provides a long-term vision for how the region will grow, change and respond to key urban development challenges and opportunities.</li> <li>It sets out opportunities and challenges at a regional level in relation to housing, infrastructure, natural hazards and climate change, natural environment, affordable housing choices for Māori, and access to social, education and economic opportunities.</li> </ul>
<i>Housing and Business Development - Capacity Assessment - Wellington City Council</i> , November 2019	WCC, HCC, PCC, KCDC, UHCC, Wellington Water, Property Economics, MRCagney, Sense Partners, Eagle Technology	<ul style="list-style-type: none"> <li>This report presents the results of the Housing and Business Land Capacity Assessment (HBA) for Wellington City Council.</li> <li>The HBA reports on the demand for, and supply of, residential and business development capacity over the 30 years to 2047.</li> </ul>

<p><i>Te Ngākau Civic Precinct Framework, 2021</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>• The purpose of this framework is to provide an integrated and strategic guide for the future of the Te Ngākau Civic Precinct.</li> <li>• The framework provides a comprehensive vision, objectives and policies for the precinct which align with the spatial plan goals of a Wellington that is resilient, greener, compact, vibrant and prosperous, inclusive and connected.</li> <li>• The vision, objectives and policies were developed with key stakeholders, including mana whenua, Councillors, Council staff and advisors and local community.</li> <li>• The vision informed the policy framework of the PDP's Te Ngākau Civic Square Precinct.</li> </ul>
<p><i>Green Network Plan, 2021</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>• The Green Network Plan (GNP) sets the direction and targets for how we green Wellington's central city in the next 30 years to address the current deficit, provide for growth and to address the climate and ecological emergency declared in 2019.</li> <li>• It is a key action out of <i>He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City</i> and focuses on how we can address the current deficit of greening and parks for residents, workers and visitors in the central city as well as provide additional green infrastructure and public amenity as the central city densifies.</li> <li>• The CCZ is aligned with the Green Network Plan as far as possible.</li> </ul>
<p>The Wellington Waterfront Framework, 2001</p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>• The Wellington Waterfront Framework ('the Framework') was adopted by Council in 2001 and is the foundation document for the Lambton Harbour provisions in the operative District Plan.</li> <li>• In recognising the importance of the waterfront to the public, the intention of the Framework was to '<i>...give people clarity and certainty about the overall direction of the development of the waterfront, while still allowing some flexibility in the development of the detail for each area.</i>'</li> <li>• The Framework sets out the following: <ul style="list-style-type: none"> <li>○ A vision for the waterfront</li> <li>○ Principles and values to govern future development of the waterfront</li> <li>○ An urban design framework for the area.</li> </ul> </li> <li>• The Framework sets out 'performance criteria' for the five key areas of the Waterfront, rather than for the Waterfront as a whole. This approach recognises that there are distinct</li> </ul>

		<p>areas of the waterfront which have different characteristics, values and uses that need to be recognised. The areas are:</p> <ul style="list-style-type: none"> <li>○ North Queens Wharf</li> <li>○ Queens Wharf</li> <li>○ Frank Kitts Park</li> <li>○ Whairepo Lagoon/Taranaki St Wharf</li> <li>○ Chaffers Area</li> </ul> <ul style="list-style-type: none"> <li>● The Framework has an important relationship with the ODP. The existing Lambton Harbour provisions are based on the Framework.</li> </ul>
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#### 4.9 Other relevant legislation or regulations

There is no other legislation or regulations relevant to this topic.

### 5.0 Resource Management Issues Analysis

#### 5.1 Background

Wellington is currently experiencing significant housing supply and affordability issues, with high house prices, rental costs, and a lack of affordable options. Recent population projections<sup>1</sup> confirm that between 50,000 to 80,000 more people are expected to live in Wellington City over the next 30 years.

As set out in the 2022 HBA update:

- To cater for this population growth, Wellington will need to provide for an estimated 36,621 new dwellings between 2021 and 2051.
- Wellington City has capacity for 26,399 realisable dwellings over the period between 2021 and 2051.
- This represents a shortfall of 10,222 dwellings from that required to meet projected population growth.

Based on the ODP Plan settings there will not be enough homes to meet the population increase. Changes across the District Plan are therefore needed to address these issues.

#### **City Centre:**

In response to the above context the key issues for the new CCZ in the Wellington PDP are summarised as follows:

- The need to give effect to the NPS-UD to increase housing supply and choice, provide as much development capacity as possible, to maximise benefits of intensification and provide for well-functioning urban environments. The ODP does not give effect to the NPS-UD or to Council's adopted Spatial Plan;

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<sup>1</sup> Wellington Regional Housing and Business Capacity Assessment Update 2022 (HBA)

- Maintaining and reinforcing the primacy of the CCZ as the city and the region's major commercial and employment hub;
- Ensuring the CCZ provides adequate development capacity to accommodate projected residential demand, including around MRT stations, while also offering a range of housing choice and enables more efficient use of available CCZ sites; and
- Adequacy of the level of amenity provided in the CCZ, particularly for inner-city residents in light of projected residential growth.

**Waterfront:**

The key issues for the new WFZ in the PDP are summarised as follows:

- Spatial extent of the Waterfront Zone and potential extensions;
- Mana whenua representation and involvement;
- Measures to preserve the waterfront's distinctive character and identity;
- Requirements of the NPS-UD and impacts on the Waterfront's height limits;
- Ensuring protection of open public space;
- Management of the redevelopment of the remaining non-developed areas on the Waterfront; and
- Resilience to climate change.

**Stadium:**

The key issues for the new STADZ in the PDP are summarised as follows:

- Consideration to be given to the possibility of specific 'bespoke' guideline provisions to apply to the Stadium site and to the Fran Wilde Walkway;
- Whether a potential increase in the number of special entertainment events per calendar year is needed; and
- Implementation of the National Planning Standards.

**Te Ngākau:**

The key issues for the new Te Ngākau precinct in the PDP are as follows:

- Conflict between the Civic Centre Heritage Area ODP approach and future vision for the area and how best to treat this in the new District Plan;
- The current provisions within the ODP present unnecessary consenting implications and risk delaying development and revitalisation of the area. A new approach is needed that enables and facilitates the necessary redevelopment of this space to align with the Te Ngākau precinct Framework;
- Resilience challenges;
- Safety, connections, amenity and design.

**5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken**

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions.

This advice includes the following:

Title	Author	Brief synopsis
<i>Demand for business land in the Wellington Region: From today's economy to future needs, May 2018</i>	Sense Partners	<ul style="list-style-type: none"> <li>• This report is intended to assist councils in the Wellington Region to assess the outlook for the regional economy, demand for business land over 3,10 and 30 year timeframes, and respond to NPSUD requirements.</li> <li>• In summary, the report found that, as a result of a shift from heavy / manufacturing to light / service industries, which use less land, and increasing intensification of industrial use, demand for industrial land in Wellington City will at most modestly increase over the next 30 years.</li> </ul>
<i>Monitoring Report: Review of Lambton Harbour Area Land Use and Trends, Planning for Growth, March 2020</i>	WCC	<ul style="list-style-type: none"> <li>• This report focuses on the Lambton Harbour Area. It is intended to assist the Council in determining whether the existing Lambton Harbour Area Policy is still appropriate.</li> <li>• It assesses the resource consent trends from the Lambton Harbour Area from 2010 to 2020 to inform the review of this zone.</li> <li>• In summary, it found that 28 resource consents had been received for the Lambton Harbour Area, with Jervois Quay and Herd Street having received the most resource consents. The most common consents were temporary activities, minor additions or alterations to buildings, development or modification of open spaces and modification to listed heritage buildings or objects.</li> <li>• Wellington Waterfront Ltd and WCC sought the most consents.</li> </ul>
<i>Monitoring Report: Review of Central Area Land Use and Trends, Planning for Growth, 2019</i>	WCC	<ul style="list-style-type: none"> <li>• This report focuses on the Central Area, and provides a stocktake of the current situation in light of the growth pressures that Wellington will face over the next 30 years.</li> <li>• It is intended to assist the Council in determining whether the existing Central Area Policy is still appropriate.</li> <li>• It assesses the resource consent trends from the Central Area from after Plan Change 48 implementation in October 2013 to July 2019 to inform the review of this zone. This covered 408 consents.</li> <li>• In summary it found that: <ul style="list-style-type: none"> <li>○ The majority of consents were for restricted discretionary activities</li> </ul> </li> </ul>

Title	Author	Brief synopsis
		<p>with 99% being non-notified consents;</p> <ul style="list-style-type: none"> <li>○ Over half of the consents were in Te Aro, with Cuba Street and Lambton Quay having the highest number of consents by street;</li> <li>○ 80% of consents were not close to the boundary of the zone;</li> <li>○ Heritage, areas, precincts, hazards, verandahs &amp; display windows are the most common notations;</li> <li>○ 45% of consents were for additions and alterations to existing buildings (which encompasses everything from minor changes, e.g. windows and verandahs, to additions of new storeys to existing CBD buildings); and</li> <li>○ Central Area building rules were the most commonly triggered rules (67%).</li> </ul> <ul style="list-style-type: none"> <li>● In relation to apartments (33 of the consents), it found: <ul style="list-style-type: none"> <li>○ Nearly a third of developments were for dual key apartments;</li> <li>○ Three quarters of apartments were studios or single bedrooms;</li> <li>○ Studio apartments were generally less than 30m<sup>2</sup>;</li> <li>○ Half of the apartments had only a single aspect;</li> <li>○ Most apartments don't have private outdoor space (66%); and</li> <li>○ For those that do have private outdoor spaces, this space usually less than 10m<sup>2</sup>.</li> </ul> </li> <li>● In relation to height and mass breaches (21 consents) it found: <ul style="list-style-type: none"> <li>○ One quarter of these consents breached both height and mass rules;</li> <li>○ Over half of height breaches were for a breach between 30 and 35%;</li> <li>○ Nearly two thirds of mass breaches were for buildings</li> </ul> </li> </ul>

Title	Author	Brief synopsis
		<p>which were over 90% of total site volume; and</p> <ul style="list-style-type: none"> <li>○ Nearly half of the height and mass breaches were for consents in Te Aro.</li> </ul>
<p><i>Te Ngākau Civic Precinct Draft Framework, October 2021</i></p>	<p>The Property Group</p>	<ul style="list-style-type: none"> <li>• This framework provides an integrated and strategic guide for the future of Te Ngākau Civic Precinct.</li> <li>• The framework’s vision, objectives and policies were developed with key stakeholders, including mana whenua, Councillors, Council staff and advisors, existing users of the precinct and local community.</li> <li>• The vision and objectives were tested with the wider community when the framework was engaged on from 19 May until 16 June 2021.</li> <li>• The framework identified the following issues: <ul style="list-style-type: none"> <li>○ Closure of buildings due to seismic damage or poor seismic performance has meant a loss of people, activity and vibrancy in the precinct;</li> <li>○ Te Ngākau does not reflect Wellington’s unique culture and identity, specifically, it does not reflect mana whenua and Te Ao Māori;</li> <li>○ The precinct has major resilience challenges now and is not equipped to deal with future resilience challenges such as climate change or a major earthquake;</li> <li>○ The precinct fails to integrate with the central city and the waterfront and provide clear, safe and inclusive access between these important places;</li> <li>○ As a public space (even before building closures), civic square is unsuccessful. It lacks activation from the buildings, it is hard and impermeable and there are inherent safety and access issues due to challenging levels, obstructed sightlines and an overall lack of permeability and legibility (access and intuitive wayfinding); and</li> <li>○ The precinct lacks greenery and green open space and does not</li> </ul> </li> </ul>

Title	Author	Brief synopsis
		<p>reflect the natural character of Wellington harbour.</p> <ul style="list-style-type: none"> <li>The Council adopted the Framework on 30 September 2021 with one amendment to reflect the residential/office development planned (via a long-term lease to Willis Bond) for Michael Fowler Centre carpark, as the development agreement was approved at the same Council meeting.</li> </ul>
<p><i>Te Ngākau Civic Precinct Framework Council Meetings, 8 April 2021 and 30 September 2021</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>Council officers presented the Te Ngākau Civic Precinct Framework to Councillors at their Strategy and Policy Committee meeting.</li> <li>The agenda paper referenced that buildings within the precinct are at various states of operation, including the Civic Administration Building (CAB), the Central Library and the Municipal Office Building (MOB). It noted that Council is considering the future of these building, including identifying these areas as areas of change and considering the future resource consent requirements.</li> <li>At the subsequent meeting on 30 September Councillors decided to approve the Precinct Plan, which included the demolition of CAB and MOB.</li> </ul>
<p><i>Planning for Growth: District Plan Review – Central Area – Background Report, March 2019</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>This report relates to an information gathering and reporting exercise for the Central Area Zone. It assesses the ODP provisions, plan changes and variations which have shaped the operative provisions and evidence informing these changes.</li> </ul>
<p><i>Planning for Growth: District Plan Review – Lambton Harbour Area – Background Report, March 2019</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>This report relates to an information gathering and reporting exercise for the Lambton Harbour Area. It assesses the ODP provisions, the plan changes and variations which have shaped the operative provisions, and the evidence informing these changes.</li> </ul>
<p><i>Planning for Growth: District Plan Review – Central Area Chapters, Issues &amp; Options Report, Updated version, February 2020</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>This report draws on existing research undertaken by the Council on the Central Area and the findings of the Monitoring Report to provide conclusions on the existing conditions for the Central Area and recommendations for the subsequent Spatial Plan and District Plan review.</li> <li>Section 3 provides an identification of the key issues derived from the existing research followed by options, confirmation of a preferred option and further work to be undertaken for each issue.</li> </ul>



Title	Author	Brief synopsis
		<ul style="list-style-type: none"> <li>• The key issues identified include: <ul style="list-style-type: none"> <li>○ Wind effects;</li> <li>○ Concerns around apartment size and functionality;</li> <li>○ Current market trends and declining density;</li> <li>○ Relevance of high-city/low-city today its effect on development;</li> <li>○ Risks to the Central Area from natural hazards;</li> <li>○ Infrastructure risks;</li> <li>○ Zone boundary alterations;</li> <li>○ Issues with design excellence in practice;</li> <li>○ The need to amend the extent of viewshafts based on previous viewshaft review findings;</li> <li>○ Heritage areas; and</li> <li>○ Implementing the National Planning Standards.</li> </ul> </li> <li>• This report was completed prior to the NPSUD being released.</li> </ul>
<p><i>Planning for Growth: District Plan Review – Lambton Harbour Area, Issues &amp; Options Report, May 2021</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>• This report draws on existing research undertaken by the Council on the Lambton Harbour Area and the findings of the Monitoring Report to provide conclusions on the existing conditions for the Lambton Harbour Area and recommendations for the subsequent Spatial Plan and District Plan review.</li> <li>• Section 3 provides an identification of the key issues derived from the existing research followed by options, confirmation of a preferred option and further work to be undertaken for each issue.</li> <li>• Section 4.1 of this report provides overall conclusions and confirms the next steps in terms of the Spatial Plan and District Plan review given the preferred options and further work identified in the preceding section of the report.</li> <li>• Key issues identified include: <ul style="list-style-type: none"> <li>○ Decisions to “Translate” existing provisions from Lambton Harbour Area or have new ones;</li> <li>○ Spatial extent of Waterfront Zone;</li> <li>○ Cross-boundary management across mean high water springs;</li> <li>○ Mana whenua representation and involvement;</li> <li>○ Distinctive character and identity;</li> <li>○ NPS for Urban Development;</li> <li>○ Protection of open public space;</li> </ul> </li> </ul>

Title	Author	Brief synopsis
		<ul style="list-style-type: none"> <li>○ Redevelopment of remaining non-developed areas;</li> <li>○ Resilience to climate change;</li> <li>○ Transfer of the Port Redevelopment; and Precinct to the new plan.</li> </ul>
<p><i>Planning for Growth: District Plan Review – Stadium, Issues &amp; Options Report, November, 2020</i></p>	<p>Hill Young Cooper and Urban Perspectives</p>	<ul style="list-style-type: none"> <li>● This report focuses on the Stadium and was commissioned to enable Council to understand the effectiveness of the current Stadium provisions and what changes were needed, if any.</li> <li>● The report reviewed the current ODP provisions, including the anticipated environmental outcomes, it reviewed resource consents granted to identify resource consent triggers, the issues addressed and outcomes achieved, provisions in other district plans and included workshops with Council consent planners and Regional Stadium Trust management.</li> <li>● It assesses the resource consent trends from the Stadium since it was built in 1999. In summary it found that the principal resource consent applications have been for additions and alterations to the Stadium, provision for temporary seating (on a long-term basis), retrospective consent to use the main public car park as a commuter car park, location of coach parking and signage.</li> <li>● This report provides conclusions on the existing conditions for the Stadium and recommendations for the subsequent Spatial Plan and District Plan review.</li> <li>● Section four provides an identification of the key issues derived from the existing research followed by options, confirmation of a preferred option and further work to be undertaken for each issue.</li> <li>● Section five provides comparative analysis of other Councils' District Plan approaches.</li> <li>● In summary, the report found that the Operative Plan provisions have been generally effective. Small changes to were suggested to address identified issues including regarding noise requirements, reviewing special entertainment events and access standards, and to align with the National Planning Standards.</li> </ul>

Title	Author	Brief synopsis
<i>Housing and Business Development - Capacity Assessment - Wellington City Council, November 2019</i>	WCC, HCC, PCC, KCDC, UHCC, Wellington Water, property Economics, MRCagney, Sense Partners, Eagle Technology	<ul style="list-style-type: none"> <li>• This report presents the results of the Housing and Business Land Capacity Assessment (HBA) for Wellington City Council.</li> <li>• The HBA reports on the demand for, and supply of, residential and business development capacity over the 30 years to 2047.</li> </ul>
<i>Retail and Market Assessment for WCC, November 2020</i>	Colliers International and Sense Partners	<ul style="list-style-type: none"> <li>• WCC commissioned a retail and market assessment of the City Centre and other Centres zones within the District Plan. This assessment needed to clearly show the current state of these markets and the future state based on expert analysis of supply and demand trends.</li> <li>• This assessment was undertaken to assist the evidentiary basis to set District Plan controls for business and commercial activity across Wellington City. Outcomes informed mechanisms, the methods and evidence base for each zone chapter of the District Plan.</li> <li>• A summary of this can be found in the reports executive summary on page 2. This report is discussed in section 6 of this report.</li> </ul>
<i>Planning for Growth: District Plan Review – Central Area Massing Mass Control Provisions – Urban Design Report, Draft - Issues &amp; Options Report, October 2020</i>	Urban Perspectives Ltd	<ul style="list-style-type: none"> <li>• Council has commissioned Urban Perspectives Ltd to carry out an evaluation of the massing control provisions in the Central Area (Chapters 12 &amp; 13).</li> <li>• The purpose of the review was to establish whether: the current massing provisions are working as intended and good design outcomes are being achieved; or they needed to change in response to current issues or deficiencies and/or in response to the anticipated growth and densification of the Central Area and the associated need to manage adverse effects.</li> <li>• This report reviewed a sample of resource consents from 2013 to 2020, undertook a survey completed by relevant Council staff and external advisors, consultants and developers to gain insight on the massing provisions from different perspectives and developed high-level issues and options.</li> <li>• This report identified seven issues relating to matters such as the effectiveness of the current provisions, the appropriateness of the 75% allowable massing, the mass/height relationship,</li> </ul>

Title	Author	Brief synopsis
		relationship with the Central Area Design Guide (CAUDG), design excellence, wind and alternatives. Four high-level options were provided that ranged from status quo, amending the control to alternative methods for managing building mass.
<i>Testing and analysis of City Centre Zone and Metropolitan Centre Zone Draft District Plan standards, October 2021</i>	Jasmax	<ul style="list-style-type: none"> <li>• Jasmax were engaged by WCC to undertake modelling and testing of WCC's DDP provisions for the CCZ and MCZ across three sites (Paddington(97 Taranaki Street), 3-5 Broderick Street and 37-39 Hania Street). These sites were selected to ensure a mix of controls across both zones were tested.</li> <li>• Jasmax test 2-3 scenarios across each site to help WCC understand the efficiency of standards and design guidance proposed, issues with the standards or metrics proposed and what may need to be altered.</li> </ul>
<i>G.I.S Review of City Centre Lot Averages (widths, lengths and square meters), April 2021</i>	WCC	<ul style="list-style-type: none"> <li>• WCC's Geographic Information System (GIS) team completed an analysis of the City Centre lot averages to inform site selection for modelling and testing of CCZ standards.</li> <li>• To produce these results, a City Engine rule file was used to create maximum inner rectangles within City Centre parcels. A further GIS process then adds total lengths and widths to these inner rectangles.</li> <li>• These lots are divided by suburb (Te Aro, Wellington Central, Mount Cook, Thorndon, Mount Victoria, Pipitea) and the median area, length and width are found.</li> <li>• The team identified 10 'Typical' lots per suburb which are representative of the median Lot area/length/width. A map viewer was created to show this analysis results.</li> </ul>
<i>Modelling of Draft District Plan City Centre Zone standards – City Centre Test Site Models, September 2021</i>	WCC's Urban Design Team	<ul style="list-style-type: none"> <li>• WCC's Urban Design team undertook extensive modelling and testing for the District Plan team over six sites within the CCZ. This included one site for every CCZ model with typical sites analysed and the most typical site per suburb assessed to test.</li> <li>• This testing was comprehensive and helped to test and ultimately decided upon potential mechanisms and standards in terms of the cumulative outputs produced in these feasible developments models, of which complied with the permitted standards. Each</li> </ul>

Title	Author	Brief synopsis
		<p>scenario identified the number of floors, number of units, number and size of studio units, number and size of 1, 2 and 3 bedroom units.</p> <ul style="list-style-type: none"> <li>• The testing compared three scenarios: <ul style="list-style-type: none"> <li>○ ODP provisions (current height limits and massing control);</li> <li>○ DDP proposal (heights, max. building length, min. building separate within sites, min. building separation and min unit sizes) – Studio, 1 bedroom and 2 bedroom unit types; and</li> <li>○ DDP proposals (heights, max. building length, min. building separate within sites, min. building separation and min unit sizes) – Studio, 1 bedroom, 2 bedroom and 3 bedroom unit types.</li> </ul> </li> <li>• The testing looked at realistic development versus permitted development. All outputs/data were recorded and models provided.</li> </ul>
<i>Planning for Residential Amenity, July 2021</i>	Boffa Miskell	<p>This report assessed measures that can be used to achieve a balance between amenity and the increased density envisaged by the NPS-UD.</p> <p>It provided recommendations on a suite of controls and standards that could be incorporated into the new District Plan for Residential Zones.</p>
<i>Residential Amenity Controls Benefits and Costs Report, July 2022</i>	The Property Group	<p>This report provided a cost benefit analysis of the proposed amenity provisions in the Draft District Plan.</p> <p>The analysis found that in most cases where the amenity provisions have been applied the development remains profitable.</p> <p>The report recommended that the building depth and separation rules and the street edge height control be reviewed to assess if the design outcomes sought could be achieved using a different tool.</p>
<i>City Centre Zone – Zone Boundary Review – District Plan Zoning Analysis, August 2020</i>	WCC	<ul style="list-style-type: none"> <li>• As part of the District Plan review 2020, the zone boundaries of the Centre City are being reviewed to ensure they are fit for purpose and reflect the existing and future land uses of the area.</li> <li>• Specifically, the draft Spatial Plan highlighted two areas bordering the existing Central City zone where the zone could change to become Centre City zone. These areas included the parts of</li> </ul>

Title	Author	Brief synopsis
		<p>Thorndon east of State Highway 1 (currently Inner Residential zone in the ODP) and the area around Adelaide Road between Rugby Street and the junction with Riddiford Street (currently Centres Zone in the ODP).</p> <ul style="list-style-type: none"> <li>• The methodology for this review included: <ul style="list-style-type: none"> <li>○ The GIS team building a land survey collection app for the District Plan team for the survey in Thorndon and Adelaide Road. This app included data entry ability speaking to land use, land ownership, current zoning, building height, site coverage and on-site parking. It also allowed for various land use categorisations i.e. retail, hospitality, residential, office space etc, private carparking, vacant etc.</li> <li>○ District Plan team members surveying all identified streets within the areas of Thorndon and Adelaide Road to 'ground-truth' information.</li> <li>○ Collected data was analysed with graphs and percentages shown.</li> <li>○ 373 parcel surveys undertaken.</li> <li>○ Assessment of existing situation against possible zones, assessment of the development trends and applicability of potential zones and a weighting exercise.</li> </ul> </li> </ul>
<p><i>Underutilised sites and qualifying matter analysis – 3D model and analysis, 2021</i></p>	<p>WCC</p>	<ul style="list-style-type: none"> <li>• This involved an internal review from WCC's GIS team looking at the impact of qualifying matters on development capacity and the extent of enabled development under the ODP provisions versus actual development.</li> <li>• The qualifying matters assessed, amongst others included: <ul style="list-style-type: none"> <li>○ Designations;</li> <li>○ Viewshafts;</li> <li>○ Public open spaces;</li> <li>○ Natural Hazards;</li> <li>○ Sites and areas of significance to Māori;</li> <li>○ Heritage areas, buildings and structures; and</li> <li>○ Notable trees.</li> </ul> </li> <li>• The analysis found that there was currently an under-utilisation of CCZ sites including vacant sites, sites used for car-</li> </ul>

Title	Author	Brief synopsis
		parking and the majority of existing development that had not built up to or exceeded ODP height limits.
<i>Underutilised sites internal review, 2022</i>	WCC	<ul style="list-style-type: none"> <li>• Analysis was undertaken of underutilised sites within the PDP CCZ. This analysis determined overall site utilisation across three metrics: building height of existing buildings compared to the allowable height, % of overall site coverage, and the ratio of capital value to land value (referred to as improvement value within the assessment).</li> <li>• The key findings included: <ul style="list-style-type: none"> <li>○ Out of the 1,221 total assessed sites within the CCZ, 384 sites (31.5%) were determined to have low or very low overall utilisation of the developable potential of the site.</li> <li>○ The assessment area covered a total of 99.7 hectares (996,880m<sup>2</sup>), 29.1 hectares of this area (29.2%) was determined as being low or very low utilisation sites.</li> <li>○ The average size of sites assessed as low utilisation is 913m<sup>2</sup>, the average size of sites assessed as very low utilisation is 523m<sup>2</sup>. Compared with Very High utilised sizes which have an average size of 1,196m<sup>2</sup>.</li> <li>○ 353 sites within the CCZ were excluded from this analysis based on their location being within a heritage area, containing a heritage building or structure, or being occupied by public open space within the CBD. The average size of these excluded sites is 1,207m<sup>2</sup>, covering a combined total area of 42.9 hectares (428,556.9m<sup>2</sup>).</li> </ul> </li> </ul>
<i>CCZ narrow streets viewer and analysis to inform Street Edge Height Control, 2021</i>	WCC	<ul style="list-style-type: none"> <li>• On the back of some feedback on the Draft Spatial Plan, Council decided to identify all the street widths within the CCZ to inform the DDP Street Edge control provisions.</li> <li>• WCC's GIS team created a 'Street Width Viewer' which showed the estimated width of road reserve from 0m to 20.1m or wider. The road widths were displayed in five classes of width size.</li> <li>• This helped WCC to understand the extent of narrow streets within the Zone.</li> </ul>

Title	Author	Brief synopsis
<i>Modelling of the effects of Street Edge Height, 2022</i>	WCC	<ul style="list-style-type: none"> <li>• Modelling by the Council’s Urban Design team was undertaken to understand the sunlight effects from the DDP’s proposed Street Edge Height control.</li> <li>• The model compared three scenarios for the control on Haining Street (an identified narrow street). The three scenarios included: <ul style="list-style-type: none"> <li>○ A 42m max. height with no setback (sans Street Edge Height control)</li> <li>○ A 42m max. height with 4m setback (as per DDP Street Edge Height control)</li> <li>○ A 42m max. height with 3m setback (to understand if a reduced setback, to provide for more development, still enabled good outcomes).</li> </ul> </li> <li>• The modelling showed that minimal sunlight access was provided in all three scenarios.</li> </ul>
<i>Modelling of the CCZ edge treatment control for Character Precincts, 2021</i>	WCC	<ul style="list-style-type: none"> <li>• Modelling by the Council’s Urban Design team was undertaken to understand the impact of the CCZ’s PDP’s ‘Character precincts and Residentially Zoned heritage areas – Adjoining site specific building height’ control upon development capacity.</li> </ul>
<i>Design excellence control review, pre-2020</i>	WCC	<ul style="list-style-type: none"> <li>• A review was undertaken of the current design excellence mechanism in the ODP. This included discussions with key internal and external stakeholders, review of resource consents and a look at best practice. Alternative drafting was considered.</li> <li>• This was not implemented in light of impending District Plan review.</li> </ul>
<i>City Outcomes Contribution internal review, 2021</i>	WCC	<ul style="list-style-type: none"> <li>• In 2021 the Council reviewed the ODP’s design excellence control to understand its efficiency in achieving intending outcomes and the need for changes.</li> <li>• Various issues in the mechanism’s definition, interpretation and application were identified.</li> <li>• Council reviewed existing resource consents, undertook best practice analysis across New Zealand and around the world and came up with the alternative COC outcome. This solution was socialised with internal stakeholders.</li> </ul>
<i>Review of extent of Central Area active</i>	WCC	<ul style="list-style-type: none"> <li>• A review was undertaken of ODP Map 49E which shows the ODP’s display</li> </ul>



Title	Author	Brief synopsis
<i>frontages and verandah coverage, 2021</i>		<p>window, verandah, verandah and display window, and heritage override requirements within the Central Area. The practicality of existing control extents were analysed.</p> <ul style="list-style-type: none"> <li>• Almost the full extent of active frontages and verandahs were retained except for a few pockets in Thorndon.</li> <li>• Decisions were made to extent these controls in almost all CCZ suburbs to reflect change in land uses, pedestrian uses and rates, the One Network Plan findings, LWGM MRT considerations etc. along the CCZ streets.</li> </ul>
<i>Green Network Plan – public space review, 2021</i>	WCC	<ul style="list-style-type: none"> <li>• Data and reports from the Green Network Plan were utilised by Council officers to inform the list of protected public spaces in the CCZ and WFZ for the PDP sunlight protection control, and to inform the CCZ open space provisions and references.</li> </ul>
<i>City Centre Zone and Waterfront Zone sunlight to public space geographic information system shading analysis, 2022</i>	WCC	<ul style="list-style-type: none"> <li>• Council's GIS team undertook analysis for each listed park in the ODP, DDP and ultimately PDP and also all adjacent properties with regards to the 'minimum sunlight access – public space requirements control' for the CCZ and WFZ.</li> <li>• The GIS team used the 2017 3D building dataset of wellington to analyse the sun shadow volume. Based on this layer and 3D analysis toolbox, they were able to model and identify the shadow cast by each building using sunlight for a given date and time (for example, 8 Feb between 12 and 2 pm).</li> <li>• They then used the overlap between the shadow volume layer and public spaces to identify which part of each public space does not have access to sunlight at a specific time of a day and which building blocks the sunlight.</li> <li>• This helped inform the final controls and time periods in the PDP CCZ and WFZ and also Appendix 9.</li> </ul>
<i>Central City Apartment Amenity and Capacity Report, March 2010</i>	WCC	<ul style="list-style-type: none"> <li>• This report covered three key aspects of the central city residential amenity issue: residential apartment amenity, capacity and location of future central city residential development, and lifestyles of inner city residents. Current policy regimes and planning tools were reviewed.</li> <li>• The report includes research on central city residential amenity, growth capacity</li> </ul>

Title	Author	Brief synopsis
		model updates and central city residential lifestyles.
<i>Central City Apartment Research Findings</i> , March 2017	WCC	<ul style="list-style-type: none"> <li>• The report details reasons for pursuing some form of District Plan intervention, research undertaken to date including a review of apartment amenity provisions of other District Plans and provides initial conclusions for key areas that warrant District Plan intervention.</li> <li>• It concluded that more guidance is needed on particular apartment aspects such as outdoor living space, size and functionality of spaces.</li> </ul>
<i>Draft Central Area Apartment Design Guide</i> , May 2017	WCC	<ul style="list-style-type: none"> <li>• Proposed provisions relating to apartment size and layout, outdoor living space, privacy and outlook, daylight, sunlight, natural ventilation, storage, common areas, apartment mix and service areas and parking.</li> <li>• Complementing the Central Area Urban Design Guide, the guidance was intended to form the basis of the resource consent assessments for new developments, non-residential buildings conversions or mixed-use developments.</li> <li>• This was not implemented in light of impending District Plan review.</li> </ul>
<i>Wellington Central Area – Commercial Property Market Composition Report</i> , April 2017	CBRE	<ul style="list-style-type: none"> <li>• CBRE were engaged to undertake market research to establish if the issues in Variation 5 were still live. The study aimed to provide a snapshot of the current retail situation and future trends for retail activity in the CBD and Te Aro.</li> <li>• Amongst other conclusions the report found that the prevalence of the Golden Mile remains unchanged and that for Large Format Retail to occur within the Central City boundaries, existing barriers i.e. land prices need to be addressed.</li> </ul>
<i>Wellington Public Space Public Life Study</i> , 2021	Gehl	In 2021 Gehl Architects completed a 'Wellington Public Space Public Life' study for WCC and LGWM. In 2004, Gehl conducted a Public Space, Public Life Study. It identified Wellington's strengths as well as growing pains, proposing a number of strategic moves to enable the waterfront city to become a better place for people. In 2021, Gehl returned to conduct a similar survey, initiated by Let's Get Wellington Moving (LGWM) to support and challenge an ambitious programme of change.
<i>Green Space in Wellington's Central City: Current provision, and design</i>	New Zealand centre for Sustainable Cities - Paul Blaschke, Ralph Chapman,	<ul style="list-style-type: none"> <li>• This report speaks to the findings of a detailed study of the provision of public green space in central Wellington City in</li> </ul>

Title	Author	Brief synopsis
<i>for future wellbeing, 2020</i>	Elaine Gyde, Philippa Howden-Chapman, Jenny Ombler, Maibritt Pedersen Zari, Meredith Perry, Ed Randal.	<p>relation to current and projected future population levels.</p> <ul style="list-style-type: none"> <li>• The study focused on the three Census Area Units (CAU) of central Wellington City.</li> <li>• The study found: <ul style="list-style-type: none"> <li>○ More than half of the central city's public green space is located not in City parks and gardens but in road reserves or in other non-council areas, and some is of relatively low quality and poorly accessible.</li> <li>○ There is a very significant lack of greenspace within Te Aro.</li> <li>○ Green space amount per capita in central Wellington City declines substantially with project population growth.</li> </ul> </li> </ul>

### 5.2.1 Analysis of Operative District Plan provisions relevant to this topic

For the purposes of this report the key provisions in the ODP of relevance to this topic are summarised below.

Topic	Summary of relevant provisions
Central Area Zone	<p>Chapters 12 and 13 comprise the provisions relating to the City's Central Area and Lambton Harbour Area. The Central Area has 16 objectives which broadly seek the following:</p> <ul style="list-style-type: none"> <li>• Enhance the Central Area's natural containment, accessibility, and highly urbanised environment by promoting the efficient use and development of natural and physical resources;</li> <li>• Facilitate a vibrant, dynamic Central Area by enabling a wide range of activities whilst managing their effects;</li> <li>• Recognise and enhance characteristics, features and areas of the Central Area that contribute positively to the City's distinctive physical character and sense of place;</li> <li>• Ensure future development is undertaken in a manner that is compatible with and enhances the Central Area's contained urban form;</li> <li>• Encourage development of new buildings provided that any potential adverse effects can be avoided, remedied or mitigated;</li> <li>• Ensure new buildings maintain and enhance the amenity and safety of the public environment in the Central Area, and the general amenity of any nearby Residential Areas;</li> <li>• Promote energy efficiency and environmental sustainability in new building design;</li> <li>• Ensure that the development of the Lambton Harbour Area, and its connections with the remainder of the city's Central Area, maintains and enhances its unique and special components;</li> <li>• Support the use and development of the regional stadium so that it continues to contribute to the well-being of the local and regional community;</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Achieve signage that is well integrated with and sensitive to the receiving environment, and that maintains public safety;</li> <li>• Ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated;</li> <li>• Maintain and enhance access to, and the quality of the coastal environment within and adjoining the Central Area;</li> <li>• Avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment;</li> <li>• Prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal;</li> <li>• Enable efficient, convenient and safe access for people and goods within the Central Area; and</li> <li>• Facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Māori.</li> </ul> <p>These objectives are implemented by a framework of 101 supporting policies that:</p> <ul style="list-style-type: none"> <li>• Seek that the extent of the Central Area is defined and activities contained within the zone;</li> <li>• Encourage a mix of activities, including providing for temporary activities;</li> <li>• Seek to manage adverse effects of activities within and outside the zone including noise effects;</li> <li>• Seek that development preserves the 'high city/low city' general urban form of the Central Area;</li> <li>• Promote a strong sense of place and identity within the zone;</li> <li>• Ensure future development is consistent with the existing urban form;</li> <li>• Provide for the future integrated development of the Pipitea Precinct;</li> <li>• Ensures development within the Te Aro Corridor assists to integrate the inner city bypass into Te Aro's urban fabric;</li> <li>• Manage building heights in order to reinforce the 'high city/low city', to respect the form of existing neighbourhoods and have appropriate height and mass for identified heritage and character areas;</li> <li>• Manage building mass to avoid adverse building effects and with height to ensure quality design outcomes;</li> <li>• Require design excellence for any building that is higher than the height standard;</li> <li>• Ensure that buildings are designed to avoid, remedy or mitigate the wind problems that they create;</li> <li>• Enhance the public environment of the Central Area;</li> <li>• Require high quality building design within the Central Area;</li> <li>• Ensure new buildings and structures do not comprise adjacent listed heritage items;</li> <li>• Protect sunlight access to identified public spaces;</li> <li>• Protect, and where possible enhance, identified public views of the harbour, hills and townscape;</li> <li>• Encourage the provision of pedestrian shelter along streets and public spaces;</li> <li>• Maintain and enhance the visual quality and design of ground floor level developments;</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Improve the design of developments to reduce the actual and potential threats to personal safety;</li> <li>• Maintain and enhance the streetscape by controlling the creation of vacant or open land and ground level;</li> <li>• Promote a sustainable built environment in the Central Area;</li> <li>• Maintain and enhance the public environment of the Lambton Harbour Area;</li> <li>• Provide for new development which adds to the waterfront character and quality of design;</li> <li>• Maintain and enhance the Lambton Harbour Area as an integral part of the working port of Wellington;</li> <li>• Seek to provide for and facilitate public involvement in the waterfront planning process;</li> <li>• Enable the continuing development and operation of the regional stadium;</li> <li>• Provide for a limited number of special entertainment events;</li> <li>• Guide the design of signs (and their associated structures and affixtures);</li> <li>• Ensure the sound design, development and servicing of all subdivisions;</li> <li>• Maintain the public's ability to use the coastal environment;</li> <li>• Identify those hazards that pose a significant threat to Wellington;</li> <li>• Ensure that the use, storage, handling and disposing of hazardous substances does not result in any potential or</li> <li>• actual adverse effects;</li> <li>• Seek to improve access for all people;</li> <li>• Identify, define and protect sites and precincts of significance to tangata whenua and other Māori; and</li> <li>• Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi.</li> </ul> <p>Rules and standards relating to land use activities, buildings, signs, subdivision, earthworks, heritage, utilities, contaminated sites are co-located in the chapter. In addition, rules relating to the Lambton Harbour Area, Wellington Regional Stadium, Operational Port Area, Pipitea Precinct, Port Redevelopment Precinct and Te Aro Corridor are located in this chapter.</p> <p>Activities are generally permitted subject to compliance with permitted activity standards relating to noise generation, parking, servicing and site access, lighting, hazardous substances and other matters, with exceptions to this including:</p> <ul style="list-style-type: none"> <li>• Activities involving the use, storage and handling of hazardous goods</li> <li>• Any activity involving the provision of more than 70 carparks</li> <li>• Any critical facility in a hazard area</li> <li>• Helicopter landing areas</li> <li>• Activities involving the creation of vacant land, open land or parking areas (all at ground level</li> <li>• Commercial sex premises in the Courtenay Place Area</li> <li>• Office and retail activities in the Pipitea Precinct</li> <li>• The modification of existing open space and creation of new open space in the Lambton Harbour Area</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Office activities in the Port Redevelopment Precinct in excess of net lettable floor office space requirement</li> </ul> <p>The rule framework permits some signage and subdivision (subject to conditions, including the provision of a Certificate of Compliance). Apart from in a small number of circumstances, all new buildings, and additions and alterations to existing buildings, require resource consent under a catch-all building and structures rule (rule 13.3.4). Where specific building standards relating to height, yard provision, noise insulation and other matters are not met, an additional rule applies (rule 13.3.8). Where the conditions within this discretionary (restricted) rule is not met, a higher activity status (discretionary unrestricted or non-complying) will apply.</p> <p>Exemptions where a controlled activity status is required include:</p> <ul style="list-style-type: none"> <li>• Additions and alterations to existing building in the Queens Wharf Special Height Area, subject to standards</li> <li>• Buildings for operational port activities that exceed 100m<sup>2</sup> and are within the southern end of the Port Redevelopment Precinct</li> <li>• The construction, alteration of and addition to buildings and structures within the Port Redevelopment Precinct, subject to standards</li> <li>• Subdivision within the Pipitea Precinct and the Port Redevelopment Precinct</li> </ul> <p>Generally, activities and buildings unable to comply with the relevant conditions within the controlled activity rules default to restricted discretionary activity status. However, exemptions where discretionary (unrestricted) resource consent is required include:</p> <ul style="list-style-type: none"> <li>• The construction, alteration of and addition to buildings and structures for retail or office activities in the Pipitea Precinct</li> <li>• Buildings and structure located above the street that exceed 25 percent of the width of the road at any point.</li> <li>• The construction, alteration of and addition to buildings and structures on any site subject to the H2 designation (Inner City Bypass).</li> </ul> <p>Separate rules within chapter 13 apply with respect to activities, signs and subdivision. Activities or building work affecting heritage, and utilities, are addressed in separate chapters.</p> <p>Throughout the rules, notification statements are provided (e.g., buildings unable to meet permitted activity standards need not be publicly notified unless special circumstances apply).</p> <p>The Central Area chapter concludes with appendices relating to:</p> <ul style="list-style-type: none"> <li>• The Courtenay Place Area;</li> <li>• Port Redevelopment Precinct;</li> <li>• Pipitea Precinct;</li> <li>• Queens Wharf Special Height Area;</li> <li>• Noise and Noise Insulation Construction Schedule;</li> <li>• Sunlight Protection of Listed Public Spaces;</li> <li>• Wind;</li> <li>• Pipitea Precinct Masterplan;</li> <li>• Panoramic View and Central Area Viewshafts;</li> <li>• Indicative list of activities under Schedule 3 of the Health Act 1956;</li> <li>• Building Height and General Development Controls – Ghuznee Street off-ramp area;</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Port Noise Management Plan; and</li> <li>• Comprehensive Development at 360-366 Lambton Quay</li> </ul> <p>Key activity and building and structure standards include:</p> <ul style="list-style-type: none"> <li>• Noise (fixed plant) and insulation and ventilation</li> <li>• Vehicle parking, servicing and site access</li> <li>• Height</li> <li>• Mass (volume)</li> <li>• View protection</li> <li>• Sunlight protection</li> <li>• Wind</li> <li>• Verandahs</li> <li>• Ground floor frontages</li> <li>• Site coverage</li> <li>• Signs</li> <li>• Subdivision.</li> </ul> <p>During the course of reviewing the operative provisions for the purposes of preparing the Central Area, Waterfront and Stadium Issues and Options Reports referred to in Section 5.2 above, various key issues were identified which are detailed in 5.3 below. In addition to those identified in Section 5.3, other issues include: These include:</p> <ul style="list-style-type: none"> <li>• The requirements of the National planning Standards 2019; and</li> <li>• The need to give effect to the NPS-UD and its direction to maximise development capacity in Tier 1 Council's City Centres.</li> </ul>
Central Area Design Guide	<p>The purpose of the statutory Central Area Urban Design Guide is to <i>“achieve high quality buildings, places and spaces in the Central Area of the city”</i>.</p> <p>The design guide is to be read in conjunction with Chapter 12 and 13 of the District Plan, and applies to new buildings, additions and alterations. It has four appendices which address: Pipitea Precinct, Te Aro Corridor, Heritage Areas and 9-13 Stout Street.</p> <p>The Heritage Area appendix (Appendix 3) covers the Civic Centre Heritage Area. It includes a description of the area and the following objectives and policies:</p> <ul style="list-style-type: none"> <li>• (CC) O1.1 <i>To maintain and enhance the values of this area, and its special civic status, by protecting the special configuration of the public space, and protecting and conserving its heritage buildings.</i></li> <li>• (CC) G1.1 <i>Retain all existing heritage buildings.</i></li> <li>• (CC) G1.2 <i>Reinstate lost features and decoration on heritage buildings.</i></li> <li>• (CC) G1.3 <i>Maintain and enhance the relatively low scale and relationship of existing buildings to the square.</i></li> <li>• (CC) G1.4 <i>The construction of new buildings in the open space of the square is not appropriate.</i></li> <li>• (CC) G1.5 <i>Retain and enhance the key entrances to the square.</i></li> <li>• (CC) G1.6 <i>Promote the development of new active edges in existing buildings on the edge of the square.</i></li> <li>• (CC) G1.7 <i>Maintain views into, around, and from the square.</i></li> <li>• (CC) G1.8 <i>Maintain the openness and access to sunlight in the square.</i></li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• (CC) G1.9 The placement of artworks and signage should respect the heritage values and fabric of the buildings.</li> <li>• (CC) G1.10 Consider the possibility of uncovering archaeological material when any earthworks or subsurface investigation are planned.</li> </ul>

### 5.2.2 Analysis of other District Plan provisions relevant to this topic

Current practice has been considered in respect of the CCZ, WFZ, STADZ and Te Ngākau with a review undertaken of the following District Plans. It is noted that none these plans have been prepared in accordance with the National Planning Standards and the NPS-UD.

#### Analysis of other District Plan provisions relevant to the CCZ:

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan (AUP) 2016	Auckland Council (AC)	<ul style="list-style-type: none"> <li>• The AUP was made operative in part in November 2016 and pre-dates the National Planning Standards and the NPS-UD. The AUP has a Business - City Centre Zone and various City Centre precincts.</li> <li>• The Business CCZ seeks to ensure the city centre is an international centre for business and learning, innovation, entertainment, culture and urban living.</li> <li>• The zone has some general objectives and policies which apply to all AUP centres and business zones. It also has 6 specific CCZ objectives relating to business, 24-hour vibrancy, managing development to accommodate growth, distinctive built form and accessibility.</li> <li>• It has 24 policies which cover land use activities, precincts, historic heritage and special character.</li> <li>• It has a long list of permitted land use activities relating to residential, commerce, community, industrial and mana whenua. New buildings and additions and alterations are a restricted discretionary activity.</li> <li>• The CCZ has various standards including height, admission of sunlight to public spaces, height control planes and bonus floor area ratios etc.</li> </ul>
Operative Hamilton District Plan (OHDP) 2016	Hamilton City Council (HCC)	<ul style="list-style-type: none"> <li>• The OHDP has a Central City Zone which includes three precincts being Downtown Precinct, City Living Precinct and Ferrybank Precinct. Hamilton's plan pre-dates the National Planning Standards and the NPS-UD.</li> <li>• The Central City Zone has 7 objectives (including precinct objectives) that speak to it being a vibrant and sustainable metropolitan and regional centre, having appropriate form, scale and</li> </ul>



		<p>diversity of activities, amenity values, increase development opportunities and being pedestrian-orientated.</p> <ul style="list-style-type: none"> <li>• These objectives are accompanied by 44 policies.</li> <li>• New buildings and key development site development are a restricted discretionary activity, whilst some additions and alterations are permitted.</li> <li>• Like WCC's PDP approach, under the OHDP's Central City Zone apartments at ground floor without an active frontage, are permitted.</li> <li>• Standards include, amongst other things, site coverage, permeable surfaces, max. height controls, through site-links, height in relation to boundary and street walls (street edge heights).</li> <li>• Hamilton's maximum height overlay heights range from no height, 20m and 13m.</li> </ul>
Operative Tauranga City Plan (OTCP) 2013	Tauranga City Council (TCC)	<ul style="list-style-type: none"> <li>• The OTCP has a Central City Zone which pre-dates the National Planning Standards and the NPS-UD. The zone covers three areas of distinct character and function.</li> <li>• The purpose of the Central City Zone is to maintain and enhance the role and function of the City Centre of the City.</li> <li>• The zone has five objectives and five policies relating to the City Centre role and function, bulk and scale of buildings, site layout and building design, accessibility and the waterfront.</li> <li>• Residential activities and demolition are a permitted activity subject to ground floor conditions and buildings are restricted discretionary activities.</li> <li>• Standards relate to building height (which ranges from 12-48.7m), pedestrian environment streets, streetscape, boundary controls etc.</li> </ul>
Operative Christchurch District Plan (ODCP) 2017	Christchurch City Council (CCC)	<ul style="list-style-type: none"> <li>• The ODCP pre-dates the National Planning Standards and the NPS-UD. It has three Central City Zones (Commercial Central City Business Zone, Commercial Central City Mixed Use Zone and a Commercial Central City (South Frame) Mixed Use Zone).</li> <li>• There is one specific objective and subsequent policies relating to the role of each of these Zones. These covers matters such as diversity of activities, adaptability, amenity, residential intensification and comprehensive development.</li> <li>• In these zones, residential activity is permitted except on ground floor on identified streets, new</li> </ul>

		<p>buildings and additions and alterations range from controlled to discretionary activity status.</p> <ul style="list-style-type: none"> <li>Standards include building heights (ranging from 8m to 30m), setbacks, sunlight and outlook for the street, minimum floor numbers (two), minimum residential boundary setbacks etc.</li> </ul>
Proposed Dunedin District Plan (PDDP) 2015	Dunedin City Council (DCC)	<ul style="list-style-type: none"> <li>Dunedin's second generation district plan (SGDP) was notified in September 2015.</li> <li>The PDDP has a Central Business District (CBD) Zone, the focus of which is for employment, retail, entertainment, leisure, visitor accommodation and art and culture activities.</li> <li>The plan has combined objectives and policies relating to the various Centre Zones. There are three objectives and 45 policies relating to various matters including the function of each zone, enabling a wide range of activities, minimising potential conflicts.</li> <li>Depending on the scale, Commercial activities range from permitted to non-complying activities, with residential activities being permitted.</li> <li>New buildings and additions and alterations to buildings are restricted discretionary activities. Standards include maximum gross floor areas, boundary treatments and other landscaping, maximum and minimum heights (minimum 8m/2 storeys and maximum 12-16m/3-4 storeys), height in relation to boundaries etc.</li> </ul>

Analysis of other District Plan provisions relevant to the WFZ:

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan (AUP) 2016	Auckland Council (AC)	<ul style="list-style-type: none"> <li>The AUP's Auckland's waterfront area sits within the City Centre Zone and is covered by various precincts within this zone including the Central Wharves Precinct, Port Precinct, Viaduct Harbour Precinct and Wynyard Precinct.</li> <li>Each of these precincts have different functions. For example, the purpose of the Central Wharves Precinct is to provide for ongoing maritime operations, whereas the Wynyard Precinct provides for the comprehensive and integrated redevelopment of large brownfield areas.</li> <li>Each precinct has tailored objectives and policies. The Central Wharves, Viaduct</li> </ul>

		<p>Harbour and Wynyard Precincts all seek to make the waterfront a world-class visitor destination, enable appropriate development, public open space and public access to the coastal environment.</p> <ul style="list-style-type: none"> <li>• Most provide for some residential activity as a permitted activity. Development ranges from permitted to non-complying status.</li> <li>• Standards include height limits, gross floor area limits, public space requirements etc.</li> </ul>
Operative Tauranga District Plan (ODTP) 2013	Tauranga City Council (TCC)	<ul style="list-style-type: none"> <li>• Under the ODTP, the waterfront is managed under the City Centre Zone, known as the special waterfront policy area. This has two precincts – Dive Crescent (with a commercial fishing focus) and The Strand (that supports recreation and entertainment <i>activities</i>, particularly events associated with the inner harbour or City Centre itself).</li> <li>• This waterfront area has a specific objective and policy which seeks that development of the City Centre waterfront area in an integrated way with buildings, structures and public areas that support a range of commercial, recreational, cultural activities and events of a temporary nature.</li> <li>• This includes detailed design of sites and buildings using a Council-led design brief process.</li> <li>• In the waterfront area, business, retail and community activities are permitted but residential activities are non-complying activities. Building activities are restricted discretionary activities, with compliance required with height limits and sunlight admission to public spaces requirements.</li> </ul>
Operative Christchurch District Plan (OCDP) 2017	Christchurch City Council (CCC)	<ul style="list-style-type: none"> <li>• The OCDP has an Open Space Coastal Zone – this zone protects the natural environment of the sandy beaches and rocky shorelines of the Christchurch coast, whilst providing for the restoration and enhancement of indigenous vegetation and habitats, compatible coastal recreation activities, public access to the coast and existing surf lifesaving, yacht club and coast guard facilities.</li> </ul>

		<ul style="list-style-type: none"> <li>• Objectives and policies apply to all open space zones and cover aspects like provision of open spaces and recreation facilities, character, quality, heritage and amenity provision, natural open space, water bodies and their margins, safety and accessibility.</li> <li>• Permitted activities include conservation work, customary harvesting, coastal recreation activities, public amenities and artwork amongst other activities. Buildings and other building activities are considered restricted discretionary activities unless otherwise specified.</li> <li>• Standards relate to bach numbers, building scale, building height (maximum 4.5m), site coverage and vehicle access.</li> </ul>
Proposed Dunedin District Plan (PDDP) 2015	Dunedin City Council (DCC)	<ul style="list-style-type: none"> <li>• The PDDP has a Harbourside Edge Zone (HEZ), which extends to the waterfront.</li> <li>• The HEZ's objectives and policies are a set of combined objectives and policies relating to the various Centre Zones. There are three objectives and 45 policies relating to various matters including the function of each zone, enabling a wide range of activities, minimising potential conflicts between activities and enhancing streetscape amenity.</li> <li>• There are three HEZ specific policies relating to campus mapped area activities within the zone and requiring new buildings and additions and alterations to be of high-level of amenity in the zone.</li> <li>• In this zone commercial activities range from permitted to non-complying activities, residential, industrial and residential activities range from permitted to restricted discretionary activities.</li> <li>• Standards specific to this zone include minimum height of 6m and maximum heights ranging from 16-20m, public pedestrian access requirements, public walkway requirements and coastal marine area requirements.</li> </ul>

Analysis of other District Plan provisions relevant to the STADZ:

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan (AUP) 2016	Auckland Council (AC)	<ul style="list-style-type: none"> <li>• The AUP has a Special Purpose - Major Recreation Facility Zone and stadium precincts including the Eden Park Precinct and Mount Smart Stadium Precinct.</li> <li>• Objectives focus on three key themes: the efficient operation of the Stadium, recognition of social and economic contribution and avoiding adverse effects on surrounding areas.</li> <li>• Objectives for the Eden Park Precinct recognise Eden Park as a regionally, nationally, and internationally important venue, and recognise that primary activities generate adverse effects on surrounding land uses which are not able to be fully internalised.</li> <li>• For the Eden Park Precinct primary activities are limited to sport and recreation, whilst the Mount Smart Stadium Precinct additionally includes, among other things, concerts, conferences and exhibitions.</li> <li>• Policies can be generally categorised as enabling and providing for major recreation activities, providing for compatible/accessory activities, and policies seeking to maintain and/or minimise adverse effects.</li> <li>• Permitted activities relate to recreation facilities and sporting events and ancillary retail, offices and conferences.</li> <li>• Events during the daytime are permitted and controlled activities during the night time.</li> <li>• Under the AUP, up to 6 concerts within a 12-month period is a discretionary activity.</li> <li>• Standards relate to things like minimum parking, lighting and height control.</li> <li>• For evening events Council requires specific information requirements around community consultation be prepared.</li> </ul>
Operative Hamilton District Plan (OHDP) 2016	Hamilton City Council	<ul style="list-style-type: none"> <li>• The OHDP includes stadium provisions within their Major Facility Zone chapter.</li> <li>• Objectives focus on three key themes: the efficient operation of the Stadium, recognition of social and economic contribution and avoiding adverse effects on surrounding areas.</li> <li>• Policies can be generally categorised as enabling and providing for major recreation</li> </ul>

		<p>activities, providing for compatible/accessory activities and policies seeking to maintain and/or minimise adverse effects .</p> <ul style="list-style-type: none"> <li>• Permitted activities relate to recreation facilities and sporting events and ancillary retail, offices and conferences.</li> <li>• Stand-alone car parking and buildings are a Permitted Activity under the DP, as are filming, broadcasting and fireworks.</li> </ul>
Proposed Dunedin District Plan (PDDP) 2015	Dunedin City Council	<ul style="list-style-type: none"> <li>• The PDDP includes stadium provisions within their Major Facility Zone chapter.</li> <li>• Objectives focus on three key themes: the efficient operation of the Stadium, recognition of social and economic contribution and avoiding adverse effects on surrounding areas.</li> <li>• Policies can be generally categorised as enabling and providing for major recreation activities, providing for compatible/accessory activities and policies seeking to maintain and/or minimise adverse effects.</li> <li>• PDDP policy enables car parking areas to be used for stand-alone car parking when not required for major recreation facility activity.</li> <li>• Permitted activities relate to recreation facilities and sporting events and ancillary retail, offices and conferences.</li> <li>• Stand-alone car parking and buildings are a Permitted Activity under the PDDP.</li> <li>• The PDDP includes a standard that stadium noise events exceeding the relevant limits must be publicised by an advertisement in the Star and Otago Daily Times or a leaflet drop in the <i>stadium noise leaflet drop mapped area</i> 10 days prior to the event.</li> </ul>

Analysis of other District Plan provisions relevant to Te Ngākau:

Plan	Local Authority	Description of approach
Operative Auckland Unitary Plan (AUP) 2016	Auckland Council (AC)	<ul style="list-style-type: none"> <li>• The AUP has an Arts, Civic and Entertainment Precinct located within the City Centre. Within the precinct are major arts and entertainment venues including the Aotea Centre, Civic Theatre, Central Public Library, and private galleries.</li> <li>• The purpose of the precinct is to provide for civic activities, ceremonies, functions, entertainment and performing arts, while</li> </ul>

		<p>ensuring development respects the special character and historic heritage places.</p> <ul style="list-style-type: none"> <li>• The precinct contains four objectives and four policies which focus on encouraging and promoting the precinct as the primary location for civic events, ceremonies and functions as well as arts and entertainment events.</li> <li>• There is also a focus on ensuring built form respects the distinctive form and scale of special character buildings and historic heritage places as well as enhancing pedestrian linkages and public spaces.</li> <li>• The precinct permits temporary activities for up to 21 consecutive days, and two temporary activities per calendar year that are up to 49 consecutive days.</li> <li>• The precinct also permits markets.</li> </ul>
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These plans were selected because:

- They have been subject to relatively recent plan reviews that have addressed similar issues relating to this topic;
- The associated Councils are of a similar scale to Wellington City, are Tier 1 councils (under the NPS-UD) and are confronting similar issues relating to this topic.

A summary of the key findings follows:

- A lot of other SGDP are still to implement the NPS-UD and some the National Planning Standards;
- Most SGDP's have City Centre Zones and accompanying precincts, albeit without the intensification required to give effect to the NPS-UD in terms of heights;
- There is symmetry across City Centre Zones with regards to objective and policy focuses around accommodating growth and amenity and design quality;
- There is significant variety across SGDP's with regards to how waterfront environments are provided; and
- Stadiums are managed through a mix of major facility zones and precincts but there is a lot of symmetry across objectives, policies and standards; and
- There are limited precincts or zones across SGDP that solely focus on managing civic precincts or squares. However, WCC's approach aligns with the AUP's approach.

### **5.2.3 Advice received from Taranaki Whānui and Ngāti Toa Rangatira**

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

#### 5.2.3.1 *Mana whenua feedback on the CCZ*

Taranaki Whānui and Ngāti Toa did provide written advice on CCZ. The advice received and Council’s response to this advice is detailed in the table below.

<b>Topic</b>	<b>Advice Received</b>	<b>Response</b>
Initial conversations	<ul style="list-style-type: none"> <li>• An initial conversation was had with mana whenua advisors to understand mana whenua’s connections to the CCZ and aspirations for this area.</li> <li>• The use of Ahi Kā was discussed and ensuring Taranaki Whānui and Ngāti Toa have a living and enduring presence and are secure and valued within their rohe. This included acknowledging Taranaki Whānui and Ngāti Toa as mana whenua and their connections.</li> <li>• A discussion was also had around design guidance, Pipitea marae, statutory acknowledgement and needing</li> </ul>	<ul style="list-style-type: none"> <li>• On the back of this discussion Council staff then drafted provisions to incorporate this feedback and shared these with mana whenua’s advisors for comment.</li> </ul>



	to weave mana whenua considerations in.	
Definition for 'well-functioning urban environments'	<ul style="list-style-type: none"> <li>Includes as a minimum for a well-functioning urban environment 'to enable Māori to express their cultural traditions and norms'.</li> <li>Could Ahi Kā and papakāinga be included here, as they were mentioned in the chapter?</li> </ul>	<ul style="list-style-type: none"> <li>The PDP has to use the definition of 'well-functioning urban environment' verbatim from the PDP. However, Ahi Kā and papakāinga have been incorporated into the CCZ's objectives and policies. Particularly, CCZ-P7.</li> </ul>
Cross-referencing	<ul style="list-style-type: none"> <li>Has cross-referenced the Historic Heritage and Sites and Areas of Significance to Māori chapters as 'the City Centre contains archaeological sites and sites and areas of significance to Māori'.</li> <li>Mana whenua advisors noted that a cross-reference was needed to the Tangata Whenua chapter</li> </ul>	<ul style="list-style-type: none"> <li>In previous iterations the chapter made a cross-reference to the Tangata Whenua and Sites and Areas of significance to Māori chapters. However, for consistency and to streamline the plan the cross-references section of each chapter has been replaced with an 'other relevant District Plan provisions' section.</li> </ul>
Referencing significant sites for mana whenua	<ul style="list-style-type: none"> <li>Council officers worked with mana whenua officers to ensure sites of particular significance in the CCZ were referenced in the introduction.</li> </ul>	<ul style="list-style-type: none"> <li>Sites such as Pipitea Marae and Pā, Kumutoto Kāinga and stream, Te Aro Kainga, Waitangi and Whairepo Lagoons are referenced in the introduction as areas of important cultural, historical and cultural connections for mana whenua. These were checked with mana whenua for appropriate inclusion.</li> </ul>
Policy framework	<ul style="list-style-type: none"> <li>Regarding the new Ahi Kā policy mana whenua advisors queried whether there was any stronger wording than 'provide for' in the opening sentence?</li> <li>Mana whenua also advised that it was important that this policy didn't just acknowledge mana whenua but also provided for their landowner and development interests, including papakāinga housing.</li> </ul>	<ul style="list-style-type: none"> <li>Council officers have undertaken numerous discussions with mana whenua advisors regarding the CCZ provisions to ensure Taranaki Whānui and Ngāti Toas' acknowledgements, values and aspirations are reflected in the provisions and to ensure mana whenua are comfortable with the CCZ PDP provisions.</li> </ul>

		<ul style="list-style-type: none"> <li>• The introduction reinforces the CCZ’s long established traditional, cultural, historical and spiritual connections and notes that more recent development interests that the mana whenua of Te Whanganui ā Tara (Wellington), Taranaki Whānui and Ngāti Toa Rangatira, have with many places and sites across the City Centre Zone. The CCZ has a specific mana whenua policy ‘Ahi Kā’ which acknowledges Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington) and their cultural associations, and landowner and development interests are recognised in planning and developing the City Centre Zone.</li> <li>• Objective CCZ-05 seeks that development in the CCZ acknowledges and sensitively response to adjoining areas and sites of significance to Māori.</li> <li>• CCZ-07 seeks that adverse effects of activities and development are effectively managed at interfaces with areas and sites of significance to Māori.</li> <li>• CCZ-P1 identifies ‘Marae activities’ as a permitted activity.</li> <li>• CCZ-P7 took this feedback on board and changed ‘provide for’ to recognise and enable, ensured developer and landowners interests were noted and provides for papakāinga, kaumātua housing and affordable Māori housing. Mana whenua</li> </ul>
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		<p>advisors noted they were happy with this changed text.</p> <ul style="list-style-type: none"> <li>• CCZ-P7 recognises and enables Taranaki Whānui and Ngāti Toa Rangatira cultural associations and landowner and development interests in the City Centre Zone by: <ul style="list-style-type: none"> <li>○ Providing for the development of papakāinga, kaumātua housing and affordable Māori housing on their landholdings;</li> <li>○ Managing new development adjoining scheduled sites of significance to Māori; and</li> <li>○ Collaborating on the design and incorporation of traditional cultural elements into public space within the zone.</li> </ul> </li> <li>• CCZ-P8 speaks to providing for good quality new development and supporting public places the reinforce the CCZ's identity and sense of place including its rich Māori and tauwiwi/non-Māori history.</li> <li>• CCZ-P9 requires that development responds to site context including a scheduled site of significance to Māori.</li> </ul>
Marae definition	<ul style="list-style-type: none"> <li>• Marae definition needs to be provided. Mana whenua advisors acknowledged that they are comfortable with the use of the AUP definition and this is good for consistency across SGDPs.</li> </ul>	<ul style="list-style-type: none"> <li>• CCZ-P1 identifies 'Marae activities' as an enabled activity that supports the role and function of the zone and enhances its vitality. This</li> </ul>

		definition is consistent with the AUP.
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### 5.2.3.2 *Mana whenua feedback on the WFZ*

Taranaki Whānui and Ngāti Toa did provide written advice on the WFZ. The advice received and Council's response to this advice is detailed in the table below.

Topic	Advice Received	Response
Context, statutory acknowledgement and areas of particular importance	<ul style="list-style-type: none"> <li>• Mana whenua advisors provided context regarding our mana whenua's interest in the Waterfront and applicable statutory acknowledgement areas and connections for mana whenua.</li> <li>• Statutory acknowledgment needed for both Iwi entities (Taranaki Whānui and Ngāti Toa) for the harbour area.</li> <li>• The waterfront is identified as being of huge significance to Te Āti Awa in particular, identified as being the home people of the waterfront.</li> <li>• Mana whenua advisors discussed the importance of and connection to Whairepo Lagoon and Te Whanganui-a-Tara for Iwi.</li> </ul>	<ul style="list-style-type: none"> <li>• Council officers have undertaken numerous discussions with mana whenua advisors regarding the WFZ provisions to ensure Taranaki Whānui and Ngāti Toas' acknowledgements, values and aspirations are reflected in the provisions and to ensure mana whenua are comfortable with the end WFZ PDP provisions.</li> <li>• The introduction identifies that mana whenua, particularly Te Āti Awa, have an important connection with Te Whanganui-a-Tara and the Whairepo Lagoon.</li> <li>• It also identifies that both Taranaki Whānui and Ngāti Toa's Claims Settlement Acts identify the Wellington Harbour as a statutory area.</li> <li>• The introduction notes that WCC must have regard to these statutory acknowledgments.</li> <li>• It identifies that the Natural Resources Plan for the Wellington Region (Schedule C4 Map 6) identifies a coastal site adjoining the Waterfront Zone with significant mana whenua values linked to the historic Te Aro Pā. The WFZ recognises the landward side of this site as also having particular significance to mana whenua, anchored by Te Wharewaka o Pōneke. The zone introduction details that the Management of the Waterfront area needs to be</li> </ul>
Changes needed to the WFZ introduction	<ul style="list-style-type: none"> <li>• Mana whenua reference is needed in the introduction.</li> <li>• There is a need reference in the introduction the importance of Te Whanganui-a-Tara and Whairepo Lagoon for Iwi.</li> <li>• Marae definition needs to be provided. Mana whenua advisors acknowledged that they are comfortable with the use of the AUP definition and this is good for consistency across SGDPs</li> <li>• Te Whanganui-a-Tara – need to reference statutory acknowledgement for Whairepo Lagoon.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Te Wharewaka o Pōneke - this is Te Ati Awa's development.</li> <li>• Te Wharewaka o Pōneke needs to be raised and acknowledged in this chapter.</li> <li>• Mana Whenua advisors urged that the policy intention for waterfront needs to be proactive – work together with iwi – across the whole waterfront.</li> </ul>	<p>integrated across mean high water springs and actively engage mana whenua.</p> <ul style="list-style-type: none"> <li>• WFZ-P1 identifies 'Marae activities' as an permitted activity that supports the role and function of the zone and enhances its vitality. This definition is consistent with the AUP.</li> </ul>
Cross-referencing	<ul style="list-style-type: none"> <li>• Mana whenua advisors noted that a cross-reference was needed to the Tangata Whenua chapter, Water Sensitive Urban Design chapter and the values Ngāti Toa have recommended for the plan.</li> </ul>	<ul style="list-style-type: none"> <li>• In previous iterations the chapter made a cross-reference to the Tangata Whenua and Sites and Areas of Significance to Māori chapters. However, for consistency and to streamline the plan the cross-references section of each chapter has been replaced with an 'other relevant District Plan provisions' section.</li> </ul>
Policy Framework	<ul style="list-style-type: none"> <li>• Mana Whenua advisors noted that objectives and policies need to be connected to the design guide.</li> <li>• Policy 1 needs to reflect mana whenua design guide references and values.</li> <li>• Policy 3 – history and culture – this needs to reflect the values, Māori place identity and historical context of mana whenua.</li> </ul>	<ul style="list-style-type: none"> <li>• Objective 2 acknowledges Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington) and their cultural associations and landowner and development interests are recognised in planning and developing the Waterfront Zone.</li> <li>• Policy 1 speaks to Marae activities as an enabled activity.</li> <li>• Policy 5 talks to requiring development of public spaces, buildings and other structures to maintain or enhance sense of place including, the areas rich Māori and tauwiwi/non-Māori history.</li> <li>• Policy 10 recognises and provides for the cultural and development interests of Taranaki Whānui and Ngāti Toa Rangatira in the WFZ by</li> </ul>

		managing new development adjoining sites and areas of significance to Māori and collaborating on the design and incorporation of Māori cultural elements into public open space within the zone.
Methods, sites of significance and changes needed	<ul style="list-style-type: none"> <li>• Feedback received from mana whenua advisors was that the current ODP Māori Precincts do not reflect the intention for mana whenua and have not been an effective tool beyond identification of the areas.</li> <li>• Key area of focus for meaningful outcomes for mana whenua in this space is the 'Sites and Areas of Significance to Māori' chapter and 'methods' in this chapter.</li> <li>• Regarding Method 1 a – mana whenua advisors have queried the extent of this method. Noting this method needed to be discussed with mana whenua as it may extend beyond this area.</li> <li>• Method 1 b – mana whenua advisors have queried whether this applies to Ngāti Toa also.</li> <li>• Mana whenua advisors noted that there are no sites of significance currently in the waterfront space but that it is a Statutory Acknowledgement area.</li> </ul>	<ul style="list-style-type: none"> <li>• Method 1 'Mana whenua involvement in managing the Waterfront Zone' is a specifically targeted method to ensure mana whenua are actively involved in key planning and decision making for the WFZ.</li> <li>• This method details that for all resource consent applications and private plan change requests in the WFZ from Te Papa to Frank Kitts inclusive and everywhere in the WFZ that affects Te Whanganui-a-Tara, WCC will require an applicant to include a record of engagement with Te Aro Pā Trust and Te Rūnanga o Toa Rangatira.</li> <li>• In addition, if a public hearing is required, the PDP will enable Te Aro Pā Trust and Te Rūnanga o Toa Rangatira to select up to half of the hearing commissioners on the panel to hear submissions and make recommendations or delegated decisions.</li> </ul>

#### 5.2.3.3 *Mana whenua feedback on the Stadium*

Taranaki Whānui and Ngāti Toa did provide written advice on the STADZ. The advice received and Council's response to this advice is detailed in the table below.

Topic	Advice Received	Response
Cross-references to the Tangata Whenua chapter	<ul style="list-style-type: none"> <li>• It was noted that the chapter has cross-referenced to Historic Heritage and Sites and Areas of Significance to Māori</li> </ul>	<ul style="list-style-type: none"> <li>• In previous iterations the chapter made a cross-reference to the Tangata Whenua chapter. However,</li> </ul>

	<p>chapters as the Stadium zone could potentially contain archaeological sites and sites and areas of significance to Māori.</p> <ul style="list-style-type: none"> <li>Taranaki Whānui and Ngāti Toa Rangatira have queried if this chapter should also make a cross reference to the Tangata Whenua chapter.</li> </ul>	<p>for consistency and to streamline the plan the cross-references section of each chapter has been replaced with an 'other relevant District Plan provisions' section.</p>
<p>Provisions to protect sites and areas of significance to Māori</p>	<p>Taranaki Whānui and Ngāti Toa Rangatira have queried that if the zone could potentially contain sites and areas of significance to Māori, could there then be provisions to protect these? (e.g., managing adverse effects)</p>	<p>In response to this point raised, STADZ-P6 seeks to ensure that use and development within the Zone recognises and has regard to the cultural, spiritual and historical values and interests and associations of importance to tangata whenua and other Māori, including scheduled sites and areas of significance within or adjoining the site.</p>

#### 5.2.3.4 *Mana whenua feedback on Te Ngākau*

Taranaki Whānui and Ngāti Toa did not provide written advice on Te Ngākau due to this precinct being brought in relatively late in the process. However, the Te Ngākau provisions are based off the Te Ngākau Civic Precinct Framework which involved active engagement with mana whenua. Further targeted work is required to specifically identify and incorporate mana whenua's interests in and connection to Te Ngākau into the Te Ngākau provisions.

#### 5.2.4 *Consultation undertaken to date*

There have been four rounds of community engagement since 2017 leading to the PDP. These are summarised as follows:

- Our City Tomorrow 2017: the purpose of this engagement was to begin a discussion with the community about what their aspirations are for the City's future given population growth, seismic risks, climate change and sea level rise. From this engagement the following city goals emerged: compact, inclusive and connected, resilient, greener, and vibrant and prosperous. A total of 724 submissions were received through this engagement.
- Growth Scenarios 2019: this City-wide engagement sought the community's views on where and how the City could accommodate 50,000-80,000 more people over the next 30 years, given the city goals. Four scenarios were presented (Inner City, Suburban Centres, and two greenfield scenarios) which represented different forms of development with a range of costs and benefits. A total of 1372 submissions were received on this engagement. This engagement showed strong support for a compact city approach, with future growth concentrated in the City Centre, inner suburbs and in and around suburban centres. There was limited support for further unplanned greenfield development. The Strategy and Policy Committee approved this growth approach in June 2019.

- Draft Spatial Plan 2020: the draft spatial plan engagement was an opportunity for the community to see more detail about the preferred growth scenario and what this could mean for their suburb. The draft spatial plan included a number of key actions that would be needed to realise the preferred scenario, and achieving the City’s goals. A total of 2900 submissions were received. The Spatial Plan was adopted by Council in June 2021.
- Draft District Plan (DDP): this was consulted on in late 2021 with 1034 submissions received. This included consultation with our two Community Boards, Councils advisory groups (Accessibility, Environmental, and Youth), a significant number of meetings and webinars etc with residents’ associations, numerous community and advocacy groups. The DDP included all relevant objectives, policies and rules to enable a full assessment by the community of the likely provisions to be included in the PDP.

The following is a summary of the primary consultation undertaken in respect of the CCZ and Te Ngākau:

Who	What	When	Relevant Issues Raised
General Public - Feedback on Draft District Plan	Public engagement on Draft District Plan, including an associated submissions process and programme of roadshow events	November - December 2021	<p>A detailed report on the submissions received on the Draft District Plan is available here: <a href="https://planningforgrowth.wellington.govt.nz/district-plan-review">https://planningforgrowth.wellington.govt.nz/district-plan-review</a></p> <p>In relation to the City Centre zone, the above report provides the following overall summary on the feedback received on the residential zones :</p> <p><i>“The majority of submissions on the City Centre Zone were general, and almost all objected to the proposed zoning of the Hobson precinct as City Centre Zone. Opposition was centred on perceptions that rezoning would adversely impact character, access, liveability, light and infrastructure pressure. Irrespective of a named location, submitters expressed general concern about aesthetics of new, tall building, and the retention of and access to green space in a densified city. Support was offered for some height subsections, with one submission from a property developer arguing that planned increases to maximum heights at one address did not go high enough. An additional submission from an overseas consulate opposed increased maximum heights around their address and the removal of the requirement to notify this, citing security reasons.”</i></p> <ul style="list-style-type: none"> <li>• A considerable number of submissions argued that Hobson Street and Hobson Crescent should be rezoned Medium Density Residential Zone with character precinct. A lot of submissions used a pro forma statement.</li> <li>• An equally large number of submitters sought for unlimited building heights in the CCZ to align with NPS-UD direction, which also used a</li> </ul>



			<p>two proforma statements. These pro forma submissions also advocated for more accessibility consideration throughout the Plan and generally supported Ahi Ka provisions.</p> <ul style="list-style-type: none"> <li>• Some submitters argued that there should be a greater provision for green space in the CCZ.</li> <li>• Concern regarding CCZ height limits along the CCZ and MRZ boundary. Reduction in recession plane provisions sought.</li> <li>• Some submissions sought the removal of street edge height control noting design, engineering and cost implications.</li> <li>• There was a mixed reaction to the proposed City Outcomes Contribution.</li> </ul> <p>See Appendix 2 for the summary of submissions.</p>
Councillor Working Group	Draft Plan and Proposed District Plan workshops	2021 and 2022	<p>There have been regular workshops with Councillors throughout the course of preparing the Draft and Proposed District Plans. These workshops covered a wide range of topics and allowed Councillors to provide feedback on key policy directions and to input into the development of the Draft and Proposed District Plans.</p> <p>The CCZ was specifically discussed at these workshops on a number of occasions. High-level points raised by Councillors included but were not limited to:</p> <ul style="list-style-type: none"> <li>• Some concern regarding the change in heights from the ODP ‘high city/low city’ approach;</li> <li>• Support for street edge height control and amenity controls;</li> <li>• Concern regarding how to address underutilised land;</li> <li>• Questions regarding the extent of CCZ zoning; and</li> <li>• Questions regarding street edge height control removal.</li> </ul>
Technical Review Panel	Draft Plan workshops	22 April 2021	<p>A Technical Review Panel (TRP) was appointed by WCC for the purpose of testing and providing feedback on the Draft District Plan chapters. The TRP included a range of design, planning, heritage, architecture and economic experts.</p> <p>The new CCZ chapter was considered by the TRP on 22 April 2021. Overall, the Panel considered that the chapters were clear and fit-for-purpose</p>

			<p>with some suggested refinements. Amongst other elements, feedback largely spoke to:</p> <ul style="list-style-type: none"> <li>• Needing to refine the comprehensive development rule;</li> <li>• Clarifying definitions;</li> <li>• Making sure the objectives referenced the CCZ as the location for the greatest and highest density in the city;</li> <li>• Ensuring strategic direction reflected the role of the City Centre and its primacy; and</li> <li>• Streamlining policies where possible.</li> </ul>
Landowners and developers	Feedback on the draft district plan and discussions	2020-2021	<ul style="list-style-type: none"> <li>• Feedback from developers and the Inner City Residents Association can be found in the DDP Submissions table in Appendix 2.</li> <li>• Informal discussions were had with developers during the drafting of provisions and as part of the Draft District Plan engagement. A lot of discussion was had regarding the CCZ rules and standards, and where the DDP differed from the ODP including amenity standards.</li> <li>• Developers were also surveyed through the Massing Control Issues and Options paper.</li> </ul>
Architects	Feedback on Massing control	2020-2021	<ul style="list-style-type: none"> <li>• Workshops were held with architects as part of engagement on the Draft District Plan particularly for Residential and Centres Zones.</li> <li>• In addition, architects were surveyed through the Massing Control Issues and Options paper.</li> </ul>
Internal WCC teams	Discussions with internal teams to inform DDP provisions	2020-2021	<ul style="list-style-type: none"> <li>• Extensive and continuous discussions were had with the Council's Te Ngākau, Build Wellington, Resource Consents, Heritage, Urban Design and Parks Sport and Recreation (PSR) teams to understand existing issues within the Central Area and to identify areas of change.</li> <li>• Provisions were socialised with these teams and feedback sought.</li> </ul>
Civic Trust	Feedback on the Draft District Plan and Te Ngākau PDP provisions	June 2022	<p>The Civic Trust's feedback on the CCZ can be found in Appendix 2. Council officers met with the Civic Trust in June 2022 to discuss the Trust's submission on the CCZ, particularly with regards to Te Ngākau. The discussion canvassed the changes from the ODP heritage area approach for the square to the PDP Te Ngākau Civic Square Precinct approach. The key elements of heritage area guidance and how they've been applied to the Precinct were discussed, in addition to the</p>

			framework, the proposed policy framework, bulk and form of potential new developments and public space provision.
Te Ngākau Precinct Draft Framework engagement	Engagement during the Te Ngākau Framework consultation process	19 May – 16 June, 2021	<ul style="list-style-type: none"> <li>Between Wednesday 19 May until 5pm, Wednesday 16 June 2021 WCC as part of engagement on the Draft Framework invited people to share their views on the Framework's proposed vision and objectives.</li> <li>WCC received 76 submissions from 61 individuals and 15 on behalf of an organisation who represented inner city residents and businesses.</li> <li>There was strong overall support for the vision - with 64.5% of submissions strongly or somewhat supporting the vision and 7.9% opposing it. All of the seven supporting objectives received strong support ranging from a low of 56.8% to a high of 86.3%, with the highest opposition at 10.9%.</li> </ul>

The following is a summary of the primary consultation undertaken in respect of the WFZ:

Who	What	When	Relevant Issues Raised
General Public - Feedback on Draft District Plan	Public engagement on Draft District Plan, including an associated submissions process and programme of roadshow events	November - December 2021	<p>A detailed report on the submissions received on the Draft District Plan is available here: <a href="https://planningforgrowth.wellington.govt.nz/district-plan-review">https://planningforgrowth.wellington.govt.nz/district-plan-review</a></p> <p>In relation to the WFZ, the above report notes that the WFZ received five submissions, which each contained specific suggestions and amendments. The report summarised feedback on the zone as follows:</p> <p><i>Submissions were in favour of increasing permitted activities in the Waterfront Zone, or suggested amendments, deletions or clarifications on text to enable more people to make use of these areas</i></p> <ul style="list-style-type: none"> <li>The submissions provided specific text changes. One submitter sought that introduction incorporate the principles of the Waterfront Framework more clearly.</li> <li>The submitter also noted that the introduction and cross-references lacked recognition of natural hazards.</li> <li>Another submission from Queens Wharf Holdings Ltd showed general support for the specific approach to buildings on Queens Wharf. Offering some suggested changes to planning maps and specific rules.</li> </ul>

			<ul style="list-style-type: none"> <li>• There was general support for the objectives and policies with some specific changes sought by submitters to WFZ-03, WFZ-P1, WFZ-P2, WFZ-P4, WFZ-P6 and WFZ-P7 in particular.</li> <li>• One submission was made on the WFZ rules with suggested alterations/deletions to various provisions. Noting in particular their opposition to Visitor Accommodation and Industrial Activities in the Zone.</li> </ul> <p>See Appendix 2 for the summary of submissions.</p>
Councillor Working Group	Draft Plan and Proposed District Plan workshops	28 July 2021	The WFZ was specifically discussed at a workshop on 28 July 2021. Discussions were had regarding mana whenua content and the Waterfront Framework amongst other points, but no concerns were raised.
Technical Review Panel	Draft Plan workshop for the WFZ	7 April 2021	<p>The new WFZ chapter was considered by the TRP on 7 April 2021. Overall, the Panel considered that the chapters were clear and fit-for-purpose with some suggested refinements. Amongst other elements, feedback largely spoke to:</p> <ul style="list-style-type: none"> <li>• Some concern about the continued reference to the Waterfront Framework, given that the document is now 20 years old.</li> <li>• A recommendation to continue the use of the 'zero height limit' given it is well understood by developers, the Council and the public.</li> <li>• Discussion around public open space and how to treat this in the zone.</li> <li>• Discussion around 'Areas of Change'.</li> <li>• The proposed buildings and structures rules and the need to be enabling of minor structures.</li> <li>• The deterrence of ground level carparking.</li> </ul>
Landowners and Developers	Feedback on the DDP and discussions	2020-2021	<ul style="list-style-type: none"> <li>• Feedback from developers that submitted on the DDP can be found in Appendix 2.</li> <li>• Informal discussions were had with developers during the drafting of provisions.</li> <li>• Council officers met Willis Bond Ltd and a representative of Queens Wharf Holdings Ltd to understand their experiences with the operative provisions.</li> </ul>
Internal WCC teams	Discussions with internal teams to inform DDP provisions	2020-2021	<ul style="list-style-type: none"> <li>• Discussions were had with the Build Wellington, Resource Consents and PSR teams to understand existing issues within the Lambton Harbour Area and areas of change.</li> </ul>

			<ul style="list-style-type: none"> <li>Provisions were socialised with these teams and feedback sought.</li> </ul>
GWRC	Discussions regarding integrated management across mean high water springs	2021	<ul style="list-style-type: none"> <li>Council officers met with GWRC to brief GWRC on their considerations for the CCZ and WFZ DDP chapters.</li> <li>Integrated management across mean high water springs was discussed between the two authorities and an agreement made to continue to work together as per current practice.</li> </ul>
CentrePort and KiwiRail	Discussions ahead of the DDP release	May 2021 – 2022	<ul style="list-style-type: none"> <li>An initial meeting was held with KiwiRail and CentrePort to discuss the WFZ chapter formation.</li> <li>The short, medium and long-term plans for the relocation of the Bluebridge ferry to the future Kaiwharawhara shared terminal was discussed and what the area could become in the long term once this transition was enabled.</li> <li>Council officers have continued to engage with CentrePort regarding the Inner Harbour Port Precinct and the WFZ boundaries.</li> </ul>
Wellington Waterfront Urban Design Technical Advisory Group (TAG)	Engagement pre DDP formation	2021	<ul style="list-style-type: none"> <li>Council met with TAG to discuss the ODP provisions and implementation over the last 20 years.</li> <li>Discussions centred on key issues and options and the need to carry Waterfront Framework principles through into the DDP chapter.</li> </ul>
Heritage NZ	Discussion ahead of the DDP chapter formation	19 May 2021	<ul style="list-style-type: none"> <li>Council officers met with members of the WCC Heritage team and Heritage NZ staff to discuss the Waterfront's history of development, tensions that exist with preservation of heritage on the waterfront and the interaction between retention of heritage items and buildings and enabling new development.</li> <li>Heritage NZ sought that development recognise settings, surrounding of buildings, effects on heritage of new proposed development next to heritage buildings.</li> <li>Also sought that access be guaranteed to the promenade.</li> </ul>
Wellington Civic Trust	Discussion ahead of the DDP chapter formation	July 2021	Council officers met with members of Wellington Civic trust during the WFZ DDP chapter formation to discuss key concerns and aspirations held by

			the Civic Trust for the DDP management of the waterfront area.
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The following is a summary of the primary consultation undertaken in respect of the STADZ:

Who	What	When	Relevant Issues Raised
General Public - Feedback on Draft District Plan	Public engagement on Draft District Plan, including an associated submissions process and programme of roadshow events	November-December 2021	<p>A detailed report on the submissions received on the Draft District Plan is available here: <a href="https://planningforgrowth.wellington.govt.nz/district-plan-review">https://planningforgrowth.wellington.govt.nz/district-plan-review</a></p> <p>In relation to the STADZ, only one submission was received from Waka Kotahi supporting the policy framework.</p> <p>See Appendix 2 for the summary of submissions.</p>
Councillor Working Group	Draft Plan and Proposed District Plan workshops	2021	The STADZ was specifically discussed at a workshop in 2021. No concerns were raised with the proposed approach.
Technical Review Panel	Draft Plan workshop for the STADZ	7 April 2021	<p>The new Stadium Zone chapter was considered by the TRP on 7 April 2021. Overall, the Panel considered that the chapters were clear and fit-for-purpose with some suggested refinements. Amongst other elements, feedback largely spoke to:</p> <ul style="list-style-type: none"> <li>• The merits regarding the Fran Wilde Walkway being zoned either Stadium Zone or City Centre Zone;</li> <li>• The need to review the existing resource consents for the walkway to understand any limitations imposed on the walkway;</li> <li>• Carefully consider the environmental outcome desired and/or likely to be realised in the southern part of the zone and adjacent to rail area;</li> <li>• Discussion around the definition and associated standards for 'special entertainment events';</li> <li>• General support for the objectives but the need to rationalise the policies; and</li> <li>• The use of non-complying activity status as a default for activity and building rules and the need to soften this.</li> </ul>
Landowners –	Feedback on the draft	2020-2021	<ul style="list-style-type: none"> <li>• Discussions were had with trust executives of the Wellington Regional Stadium to understand</li> </ul>

Wellington Regional Stadium Trust	district plan and discussions		<p>how the trust found the ODP provisions and the outcomes being achieved.</p> <ul style="list-style-type: none"> <li>• Feedback from the trust executives was that the provisions were generally effective.</li> <li>• Furthermore, the trust executives did not identify the need for an 'expansion' to the range of activities currently permitted. Nor did they anticipate any development in the foreseeable future for the Stadium Zone.</li> </ul>
Internal WCC teams	Discussions with internal teams to inform DDP provisions	2020-2021	<ul style="list-style-type: none"> <li>• Discussions were had with the Resource Consent and Urban Design teams to understand existing issues within the Stadium under the ODP provisions and whether there were any areas for potential change needed.</li> <li>• Feedback from both teams was that the provisions were generally effective.</li> <li>• Provisions were socialised with these teams and feedback sought.</li> </ul>

A summary of specific feedback on these topics received during consultation on the Draft District Plan is contained in Appendix 2, including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

### 5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
<b>Central Area (excluding the Stadium, Lambton Harbour Area and Te Ngākau)</b>		
<p>Issue 1: Reinforcing the identity and role of the City Centre</p>	<ul style="list-style-type: none"> <li>• There is a need to maintain and reinforce the primacy, vibrancy and vitality of the CCZ as the city and the region’s major commercial and employment hub. This also aligns with the National Planning Standards structure.</li> <li>• Clearer definitions of the roles and functions of the City Centre relative to other centres throughout the city (e.g. metropolitan centres such as Johnsonville/Kilbirnie, town centres such as Newtown/Tawa) are needed, including sustainably accommodating projected residential and business growth.</li> <li>• There is a need to reconcile the tension between the existing and evolving character/identity of the City Centre, particularly in response to the intensification envisaged by the NPS-UD.</li> <li>• The NPS-UD directs a significant increase in intensification and a maximisation of the development capacity of the Zone. It also directs that urban environments (and their amenity values) will change over time.</li> </ul>	<ul style="list-style-type: none"> <li>• The explicit purpose of the CCZ is to ‘enable and reinforce the continued primacy of the Wellington central city area as the principal commercial and employment centre servicing the city and metropolitan region’.</li> <li>• Continued focus from ODP on commercial heart of the city, mixture of activities, urban form etc.</li> <li>• National Planning Standards have resulted in the carve out of current Central Area provisions and unique areas into separate district wide chapters, i.e. Viewshafts, and also standalone zones or precincts, i.e. STADZ.</li> <li>• The introduction, objectives and policies of the CCZ speak to the City Centre being the primary centre servicing Wellington. Current focus on ensuring consistency where possible in all Centres zones with policy and standards alignment to reinforce hierarchy.</li> <li>• Step away from use of ‘character’ and a focus on current surrounds. Whilst still focusing on the city’s identity and unique sense of place. Informed by NPS-UD direction on changing environments over time.</li> </ul>
<p>Issue 2: Accommodating</p>	<ul style="list-style-type: none"> <li>• Need to ensure availability of adequate development capacity to accommodate projected residential demand while also offering a range of housing choice. This is a direct response to the NPS-UD’s directive</li> </ul>	<ul style="list-style-type: none"> <li>• Strong focus across the chapter on accommodating growth and enabling more development capacity.</li> <li>• An increase in the scale and intensity of development is enabled across the zone.</li> </ul>



<p>more growth within the Zone</p>	<p>to intensify, maximise development capacity and respond to residential and commercial demands.</p> <ul style="list-style-type: none"> <li>• The operative provisions have enabled inefficient/non-strategic use of available City Centre development capacity, particularly on large, narrow and/or vacant development sites.</li> <li>• The new provisions need to anticipate and accommodate projected growth demand for development near locations where LGWM mass transit investment has been signaled.</li> <li>• New provisions need to manage the tension between ongoing commercial activation of street edges within the City Centre, particularly along key pedestrian routes, and providing opportunities at street level to accommodate projected residential growth.</li> </ul>	<ul style="list-style-type: none"> <li>• This includes a response to building height, density and urban.</li> <li>• Need to meet short, medium and long term residential and commercial needs.</li> <li>• Policy focus on: <ul style="list-style-type: none"> <li>○ Enabling denser high-quality development to occur for a greater range of housing</li> <li>○ Enabling ground floor residential use along identified streets</li> <li>○ Enabling integrated, comprehensive, well-designed intensification</li> <li>○ More efficient optimisation of the available development capacity of large, narrow and vacant sites and ground level parking areas.</li> </ul> </li> <li>• Rules and standards that encourage greater intensification.</li> <li>• Rapid transit development and enabling activities and development near existing and planned rapid transit stops.</li> <li>• Discouraging use of sites for ground-level car parking through demolition and removal</li> <li>• Enabling building conversions for residential activities.</li> <li>• Heights and density: <ul style="list-style-type: none"> <li>○ No longer enforcing 'high-city/low-city'</li> <li>○ Minimum height limit</li> <li>○ Transitional heights along residential interface</li> <li>○ Height controls for qualifying matters.</li> </ul> </li> <li>• Zoning decisions <ul style="list-style-type: none"> <li>○ Portland Crescent and Selwyn Terrace – change to CCZ; and</li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>Adelaide Road – incorporated into the CCZ.</li> </ul>
Issue 3: Activities	<ul style="list-style-type: none"> <li>The City Centre needs to attract and retain a diverse range and distribution of activities that contribute to the vitality and vibrancy of the CC and reinforce the roles and functions of the area.</li> <li>The NPS-UD directs Council's to enable a "<i>well-functioning urban environment</i>" that enables people to communities to provide for their social, economic, and cultural wellbeing, and for their health and safety.</li> </ul>	<ul style="list-style-type: none"> <li>Continued focus from operative plan on enabling a wide range of activity to complement the commercial and governmental focus and vibrancy of the zone.</li> <li>The applicable policies focus on explicitly identifying activities to be enabled, and also identifying activities that are discouraged which are incompatible with the role and function of the CCZ. Clear rule framework.</li> <li>Also a particular focus on enabling activities throughout the whole zone i.e. encouraging day and night time economies and use.</li> </ul>
Issue 4: Resilience and sustainability	<ul style="list-style-type: none"> <li>Vulnerability of City Centre areas to the effects of climate change, particularly sea level rise, and natural hazards such as liquefaction, earthquakes, flooding and tsunamis.</li> <li>The need for adaptive reuse of buildings identified as a seismic risk.</li> <li>The need to encourage increased uptake of building and energy efficiency measures.</li> <li>This responds to direction from Te Atakura First to Zero, the Spatial Plan, the NPS-UD, and the Climate Change Response (Zero Carbon) Amendment Act.</li> <li>Identifies natural hazards and anticipated climate change effects.</li> </ul>	<ul style="list-style-type: none"> <li>Policy direction focus on: <ul style="list-style-type: none"> <li>Resilient development capacity.</li> <li>Producing and requiring a resilient urban environment that effectively adapts and responds to natural hazard risks and the effects of climate change.</li> <li>Requiring new development to respond to natural hazard and climate change effects.</li> </ul> </li> <li>Incorporating resilience into matters of discretion.</li> </ul>
Issue 5: Design	<ul style="list-style-type: none"> <li>The ODP provisions have variable standards regarding design in the Central City.</li> <li>The quality of some of the building design/works and public space provision compromises the City Centre's roles and functions and diminishes the existing and evolving character of the area.</li> <li>There is a need to manage the tension between retaining/enhancing existing City Centre character and enabling greater design ingenuity/creativity.</li> <li>The NPS-UD provides for "<i>well-functioning urban environments</i>".</li> </ul>	<ul style="list-style-type: none"> <li>No reference to 'design excellence' – new COC mechanism introduced in the PDP to achieve key city outcomes in a clear, matrix point system. Integrated through policies, rules and the Centres and Mixed Use and Residential Design Guides.</li> <li>Clearer 'high quality' design considerations through policy, matters of discretion and assessment criteria, for example, focus on design, scale and configuration of proposed development, visual and</li> </ul>

	<ul style="list-style-type: none"> <li>• There are identified issues with current provisions and perverse design outcomes are being seen.</li> <li>• The design excellence policy has been found to be ineffective, difficult to interpret and administer.</li> </ul>	<p>architectural qualities and relationship of the proposed building to the streetscape etc.</p> <ul style="list-style-type: none"> <li>• Updated design guides and new requirement to consider the Residential Design Guide where there is a residential activity.</li> <li>• Scope of matters of discretion are significantly expanded to focus on improving design outcomes.</li> </ul>
Issue 6: Amenity	<ul style="list-style-type: none"> <li>• Concerns have been raised regarding the adequacy of the level of amenity (e.g. noise, acoustic insulation (refitting), outlook, daylight, usability, storage, clothesline, waste disposal, bike parking) provided in the City Centre, particularly for inner-city residents in light of projected residential growth.</li> <li>• The new provisions need to provide ongoing comfort, attractiveness, safety and activity for active users (e.g. pedestrians, cyclists and e-scooter users) along key movement routes and public spaces that reinforce the roles and functions of the City Centre (i.e. premiere city/regional commercial area).</li> <li>• There is a need to manage the effects of City Centre activities and building heights anticipated by the NPS-UD along boundary interfaces with residentially zoned properties.</li> <li>• Identified issues with current provisions resulting in perverse design and residential amenity outcomes i.e. small units and poor daylight access to residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Strong policy direction regarding providing amenity for the public realm and residential amenity, including: <ul style="list-style-type: none"> <li>○ Ensuring development contributes to creating a high quality, well-functioning urban environment.</li> <li>○ Providing a quality and level of amenity in the CCZ that evolves and positively responds to anticipated growth and changing needs.</li> <li>○ Maintain and enhancing the amenity and safety of the public realm.</li> <li>○ Discouraging activities that will have adverse effects.</li> <li>○ Achieving a high standard of residential amenity through various listed means i.e. minimum unit size etc.</li> </ul> </li> <li>• Explicit residential amenity standards: <ul style="list-style-type: none"> <li>○ Residential unit size – minimum net floor area requirements per residential unit type.</li> <li>○ Residential outdoor living or communal space – minimum area and dimension requirements.</li> <li>○ Residential outlook/privacy - minimum separation distances.</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>Residential storage space.</li> </ul>
Issue 7: Open Space	<ul style="list-style-type: none"> <li>Concerns raised regarding the adequacy, location and quality of private open space provided in the City Centre, particularly for inner-city residents in light of projected residential growth.</li> <li>The new provisions need to encourage greater provision of adequate accessible public open space in the City Centre to offset the increased levels of intensification anticipated by the NPS-UD.</li> <li>Identified issues with current open space provision in the City Centre, including a severe deprivation in Te Aro in particular.</li> <li>Alignment with the Green Network Plan required.</li> </ul>	<ul style="list-style-type: none"> <li>Focus on managing the need for higher, denser development in the City Centre by completing this with measures to ensure buildings and spaces are designed to enhance public realm, access to open spaces and sunlight and active and passive recreation.</li> <li>Strong policy direction regarding: <ul style="list-style-type: none"> <li>Meeting residential and commercial growth needs through convenient open space access</li> <li>Protecting current areas of open space and providing greater choice</li> <li>Managing adverse effects</li> <li>Ensuring new development contributes to the visual interest of adjoining open space</li> <li>Enabling well-designed and safe open spaces</li> </ul> </li> <li>Open space being a qualifying matter.</li> <li>Standards, including: <ul style="list-style-type: none"> <li>Sunlight access</li> <li>Verandah provision</li> <li>Active building frontages</li> <li>Screening of outdoor storage and service areas.</li> </ul> </li> <li>Residential outdoor living space requirement</li> </ul>
Issue 8: Tangata Whenua	<ul style="list-style-type: none"> <li>Appropriate recognition and integration of mana whenua values into the City Centre is needed.</li> </ul>	<ul style="list-style-type: none"> <li>Objectives and policies regarding Ahi Kā .</li> <li>Enabling residential activities including papakainga and kaumatua housing and marae activities.</li> </ul>

	<ul style="list-style-type: none"> <li>New objectives and policies are required to give greater effect to Te Tiriti o Waitangi, the RMA and the NPS-UD.</li> </ul>	<ul style="list-style-type: none"> <li>Requiring new development to respond to a .sites and areas of significance to Māori – policy direction and matters of discretion.</li> </ul>
<b>Te Ngākau</b>		
Issue 1: Conflict between the Civic Centre Heritage Area ODP approach, future vision and the need for a new approach that enables necessary redevelopment and revitalisation	<ul style="list-style-type: none"> <li>Currently the area is managed as a heritage area under the ODP. In 2020, Council developed a vision and objectives for the Precinct which looks to enhance Te Ngākau Civic Precinct's role as the thriving heart of our growing capital city, while protecting its iconic or heritage features.</li> <li>The current provisions within the ODP present unnecessary consenting implications and risk delaying development and revitalisation of the area. A new approach is needed that enables and facilitates the necessary redevelopment of this space to align with the Te Ngākau precinct Framework.</li> <li>The area faces seismic, climate change and other issues and a new vision was determined to guide re-development. The seismic effects on the square has meant a loss of use, activity and vibrancy in the square.</li> <li>The current Heritage Area approach retains the status quo and doesn't easily enable change to this area.</li> </ul>	<ul style="list-style-type: none"> <li>Creation of a Te Ngākau Civic Square Precinct to give effect to the Te Ngākau Civic Precinct Framework which was adopted by Councillors in October 2021.</li> <li>Retention of key policy content from Civic Centre Heritage area and policy direction to respect existing historic heritage buildings and the square's history.</li> <li>The purpose of the Te Ngākau Civic Square Precinct is to provide for civic activities, functions, areas of open space and redevelopment of the precinct while ensuring that any future development respects the special qualities of the area, including the concentration of listed heritage buildings.</li> </ul>
Issue 2: Resilience challenges	<ul style="list-style-type: none"> <li>This area was significantly impacted during the 2013 Seddon and 2016 Kaikoura earthquakes, with closure of buildings due to seismic damage or poor seismic performance.</li> <li>This area also has major resilience challenges now and will face future resilience challenges such as climate change i.e. sea level rise and seismic issues.</li> </ul>	<ul style="list-style-type: none"> <li>One of the key aims of the precinct is to ensure that it is equipped to respond to significant seismic and climate change resilience challenges.</li> <li>This is supported by objectives and policies, specifically CCZ-PREC-O1, CCZ-PREC-02 and CCZ-PREC-P3.</li> </ul>
Issue 3: Mana Whenua	<ul style="list-style-type: none"> <li>Te Ngākau does not reflect Wellington's unique culture and identity, specifically, it does not reflect mana whenua and Te Ao Māori.</li> </ul>	<ul style="list-style-type: none"> <li>Introducing specific introduction text acknowledging Taranaki Whānui and Ngāti Toa Rangatira and their connection to Te Ngākau.</li> </ul>

		<ul style="list-style-type: none"> <li>Introducing objectives and policies that seek to integrate mana whenua values into design and recognise mana whenua cultural values in the design of public spaces.</li> </ul>
Issue 4: Safety, connections, amenity and design	<ul style="list-style-type: none"> <li>Civic square lacks activation from buildings, it is impermeable and there are safety and access concerns due to challenging levels and obstructed sightlines and a lack of green open space.</li> </ul>	<ul style="list-style-type: none"> <li>Introducing objectives and policies (CCZ-PREC-O1-CCZ-PREC-O3 and CCZ-PREC01-P2) focused on the use and development of the precinct, maintain the precinct's special character, enhancing its public function, requiring accessible, safe and convenient connections and development to contribute positively to the square's visual quality, amenity and safety.</li> </ul>
<b>Lambton Harbour Area</b>		
Issue 1: Translating existing provisions from Lambton Harbour Area or the decision to create new ones, as well as responding to the NPS-UD	<ul style="list-style-type: none"> <li>The Wellington Waterfront Framework (adopted 2001) has remained a guiding document for how the Waterfront should develop. However, since the Environment Court determined that its reference in the district plan was ultra vires, its status under the RMA is unclear.</li> <li>This raises a broader question about whether this district plan review is the right time and place to reconsider this Framework, the planning controls in the district plan, and how the Waterfront should develop.</li> <li>The Waterfront Framework anticipated two stages of district plan controls (pages 43-44). In the first stage, new buildings and significant alterations to existing buildings would be discretionary activities. In the second stage, the district plan would provide greater direction on design of new buildings and structures, allowing some developments to proceed non-notified.</li> <li>Case law has meant that district plan controls have not proceeded beyond stage one, due to community opposition and disagreement about how the location, bulk and design of buildings on the Waterfront should be managed.</li> </ul>	<ul style="list-style-type: none"> <li>The Lambton Harbour Area becomes a special purpose zone called the Waterfront Zone, using the new structure and format from the National Planning Standards. Plan provisions are generally carried through from the current plan to the draft plan, with some updates where needed.</li> <li>The Framework remains a guiding document for new development in the Zone. WCC decided that the District Plan review was not the right method or timing to review the framework.</li> <li>Any major new buildings or structures, or major alterations to existing structures, will remain at least discretionary and publicly notified until a plan change or variation introduces site or zone-specific controls for these developments.</li> </ul>

<p>Issue 2: Spatial extent of Waterfront Zone and potential extension</p>	<ul style="list-style-type: none"> <li>• The current Lambton Harbour Area extends from Shed 21 to Waitangi Park. Eventually the Waterfront Zone should extend to the Fran Wilde Walkway ramp, but this is dependent on the timeframes CentrePort have for redeveloping the area.</li> <li>• As part of Council's deliberations around the extent of the WFZ and potential extensions options, a suggestion was made that the land including the Clyde Quay boat sheds, Freyberg Pool and Freyberg Beach play area could be considered for inclusion in the Waterfront Zone.</li> <li>• The Waterfront Zone covering all of Cable Street, Jervois Quay, Customhouse Quay, and Waterloo Quay north to Shed 21, is inconsistent with the general DDP approach for the zones to go to the centre of the road corridor.</li> </ul>	<ul style="list-style-type: none"> <li>• The Waterfront Zone covers the same extent as the Lambton Harbour Area, except that it extends to the middle of the Quays (and Cable Street) only on its landward boundary.</li> <li>• The PDP's Inner Harbour Port Precinct's (IHPP) introduction identifies that the eventual vision for the precinct is that it becomes an extension of the WFZ. As such the WFZ expected to be extended in the future north up to Hinemoa Street and Fryatt Quay to include the IHPP. This is anticipated to occur once the area is no longer needed for passenger and port purposes, with the anticipated shifting of the Bluebridge ferry operations to the new multi-user ferry terminal in Kaiwharawhara. Once this occurs the IHPP is expected to become more of a mixed-use environment with public space and access, akin to the current WFZ. In the interim the IHPP is zoned Port Zone in the PDP.</li> <li>• In order to achieve this IHPP rezoning, any future comprehensive redevelopment and rezoning of the area would be progressed through a plan change process, including the preparation of a companion masterplan to guide anticipated development.</li> </ul>
<p>Issue 3: Cross-boundary management across mean high water springs</p>	<ul style="list-style-type: none"> <li>• Activities at the Waterfront practically impact both the land and harbour environments. The reclaimed land in the Waterfront Zone falls under the district plan jurisdiction. However, areas on wharves seaward of mean high water springs fall within the coastal marine area, and their use and development is controlled by Wellington Regional Council's Regional Coastal Plan. As the major wharves are essentially</li> </ul>	<ul style="list-style-type: none"> <li>• A method for WCC and GWRC to work towards consistent administration across MHWS, in particular where structures or effects cross the MHWS boundary.</li> </ul>

	<p>extensions of the land area, the two councils are working closely together to ensure consistency in administration of the coastal environment.</p> <ul style="list-style-type: none"> <li>• There should be a consistent vision and planning approach for land use activities on either side of mean high water springs. Control of other activities involving the disturbance of the seabed and discharge of contaminants will remain with the Wellington Regional Council.</li> <li>• Ngāti Toa and Taranaki Whānui both have memoranda of understanding with Wellington City Council. In these MOU, the parties agree to work together in partnership towards the sustainable prosperity of Wellington City. Partnership, participation and protection are the three main ways how the parties will engage with each other.</li> </ul>	
Issue 4: Mana whenua representation and involvement	<ul style="list-style-type: none"> <li>• The Council recognises Ngāti Toa Rangatira and Taranaki Whānui ki te Upoko o te Ika as holding mana whenua status in the Wellington City area.</li> <li>• Mana whenua representatives have identified the area of Te Papa to Whairepo Lagoon as having particular value. They would like mana whenua to be involved in the ongoing operation and development of this area. The Tenth's Trust also have a long-term lease and building for the Wharewaka on Taranaki Wharf.</li> <li>• Taranaki Whānui ki Te Upoko o Te Ika and Ngāti Toa Rangatira both have statutory acknowledgements over the Wellington Harbour.</li> </ul>	<ul style="list-style-type: none"> <li>• Represent and celebrate the identity of Ngāti Toa and Taranaki Whānui as mana whenua, and their culture and traditions as urban coastal iwi and hapū through Waterfront features, developments and activities.</li> <li>• In area from Te Papa to Whairepo Lagoon, enable Port Nicholson Settlement Trust to pre-consult with new applications, provide reports to hearing panels, and select up to half the hearing commissioners.</li> </ul>
Issue 5: Distinctive character and identity	<ul style="list-style-type: none"> <li>• The Waterfront is Wellington's most visible, most prominent public space. It is a key attraction to the City. This means the design of buildings and their surrounding space need to be exemplars of architecture and urban design, while representing the distinctive character and identity of the Waterfront.</li> <li>• This issue is not just for the remaining areas of potential redevelopment, but also for buildings and public spaces that may be altered or replaced over the coming years.</li> </ul>	<ul style="list-style-type: none"> <li>• Retain tight controls on the design of open spaces and buildings, with clear outcomes for urban form and new/altered buildings to meet.</li> </ul>



<p>Issue 6: Protection of open public space</p>	<ul style="list-style-type: none"> <li>• The Waterfront has parks, plazas, wharves, promenades and other open public spaces that are heavily used and highly valued.</li> <li>• The Waterfront’s value for many different activities also generates high demand for publicly and privately-run buildings to be on the waterfront. It’s a prestigious location for buildings with great access, amenity and views. However, buildings can take over the public space that makes the Waterfront so valuable.</li> <li>• The Wellington Waterfront Framework and general public opinion (based on the reaction to Variation 17) support protecting existing popular public spaces from new permanent buildings.</li> </ul>	<ul style="list-style-type: none"> <li>• Clearly identify Waitangi Park and Frank Kitts Park as public open spaces, with new large buildings being Discretionary or Non-Complying activities.</li> <li>• New buildings on other existing public open space are non-complying, with policy limiting them to where they are a functional necessity or to improve the urban environment.</li> </ul>
<p>Issue 7: Redevelopment of remaining non-developed areas</p>	<ul style="list-style-type: none"> <li>• While most of the Waterfront redevelopment is complete, there are remaining areas that could be redeveloped to improve the public’s overall appreciation and enjoyment of the Waterfront. These areas include: <ul style="list-style-type: none"> <li>○ The Barnett Street carpark east of Te Papa;</li> <li>○ The outer ‘T’ of Queens Wharf (managed by the Regional Coastal Plan);</li> <li>○ Land north of Shed 21; and</li> <li>○ The northern wharves: Wool Jetty, Railway, Glasgow, Kings (managed by the Regional Coastal Plan).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Redevelopment of surface level carparks are a restricted discretionary activity. The matters of discretion would be based on the Wellington Waterfront Framework, and other outputs of previous planning processes.</li> <li>• Public notification would still be mandatory for permanent buildings and public spaces, given the public interest and involvement in these sites. Design criteria could be included specific to the individual areas. Work on heritage buildings is managed by the historic heritage overlay chapter.</li> </ul>
<p>Issue 8: Resilience to climate change</p>	<ul style="list-style-type: none"> <li>• Natural hazard risks, including earthquakes, liquefaction, and coastal inundation exacerbated by sea level rise will be addressed in the natural hazards chapter. However, given the Waterfront’s interface with the sea and it being on reclaimed land, this zone must address how its development can be resilient to climate change generally.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy ensuring climatically resilient building design that is adaptable to change in use over time. Policy on use of sustainable building technologies that increase energy efficiency and reduce greenhouse gas emissions.</li> <li>• New provisions for coastal inundation from sea level rise, and other coastal hazards, in the coastal environment chapter.</li> </ul>

<p>Issue 9: Building heights and the NPS for urban development</p>	<ul style="list-style-type: none"> <li>• The NPS-UD directs district plans to enable building heights of at least 6 storeys within a walkable catchment of the edge of city centre zones (Policy 3(c)(ii)). This includes all of the Waterfront Zone. This requirement can be modified to the extent necessary to accommodate a qualifying matter.</li> <li>• The Waterfront Zone contains a large collection of historic heritage.</li> </ul>	<ul style="list-style-type: none"> <li>• Retain the maximum building heights. The term “zero building height” may or may not be retained, but the effect will be carried through.</li> <li>• Utilise qualifying matter with regard to historic heritage across the whole zone to retain current building heights.</li> </ul>
<p><b>Stadium Zone:</b></p>		
<p>Issue 1: Effectiveness of current provisions</p>	<ul style="list-style-type: none"> <li>• Drawing on the review of six resource consent applications and discussions with the Council’s resource consent planners and Regional Stadium Trust executives, the overall conclusion was that the operative District Plan provisions have been generally effective.</li> <li>• No significant issues have been identified in relation to the operative District Plan objectives, policies and rules that apply to the Stadium site.</li> <li>• Where applications have been necessary to accommodate changes to the Stadium operation, these have been processed on a non-notified basis.</li> </ul>	<ul style="list-style-type: none"> <li>• Retain operative District Plan provisions, subject to potential amendments to address matters relating to: <ul style="list-style-type: none"> <li>○ Reviewing the noise limit allowance by one hour (11pm to 12pm).</li> <li>○ Deleting the on-site coach parking requirements and rely on consent conditions.</li> <li>○ Reviewing the number of events per calendar year.</li> <li>○ Reviewing access standards.</li> </ul> </li> </ul>
<p>Issue 2: Design Guidance</p>	<ul style="list-style-type: none"> <li>• Under PC48 the Stadium site became subject to the new CAUDG.</li> <li>• The CAUDG does not include any ‘bespoke’ objectives or guidelines that apply specifically to the Stadium site.</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration to be given to the possibility of specific ‘bespoke’ guideline provisions to apply to the Stadium site.</li> </ul>
<p>Issue 3: Future development proposals</p>	<ul style="list-style-type: none"> <li>• Discussions with the Regional Stadium Trust management did not identify any specific development proposals likely to be initiated by the Trust.</li> <li>• In the past, consideration has been given to the option of enclosing the Stadium with a roof cover. However, this is not an option that the Trust is pursuing given the design and engineering challenges, and the associated project costs.</li> <li>• Proposals that have in the past been mooted by parties aside from the Trust include: <ul style="list-style-type: none"> <li>○ indoor arena (possible location on the Fran Wilde Walkway); and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Any development on the Fran Wilde Walkway would necessitate a seismic/structural upgrade of the walkway structure.</li> <li>• No changes to the District Plan regarding future development opportunities as none have been identified.</li> </ul>

	<ul style="list-style-type: none"> <li>○ apartment developments on the southern end of the Fran Wilde Walkway.</li> </ul>	
Issue 4: Aligning with the National Planning Standards	<ul style="list-style-type: none"> <li>• The National Planning Standards (the Standards) were introduced as part of the 2017 amendments to the RMA, with the first set of Standards coming into force on 3 May 2019.</li> <li>• <i>Section 8: Zone Framework Standard</i> sets out that a district plan must only contain the zones listed in Table 13 where consistent with the description of these zones.</li> </ul>	<ul style="list-style-type: none"> <li>• To align with the Standards a <i>Stadium Zone (STADZ)</i> section will need to be included within the chapter <i>Special Purpose Zones (SPZ)</i>, under the heading <i>Part 3 - Area-Specific Matters</i>.</li> <li>• Consideration needed for how to address pedestrian access to and from the Stadium in terms of the footbridge connection over the railyards.</li> </ul>

## 6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

### 6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below. Given this S32 evaluation report addresses four topics – CCZ, WFZ, STADZ and Te Ngākau – which have all experienced some change but vary in terms of extent of change, two separate scale and significance tables have been provided below. The first covers the CCZ and Te Ngākau, and the second WFZ and STADZ. These have been grouped to reflect differences between the two in terms of extent of change, scale and significances.

#### City Centre Zone and Te Ngākau:

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change			✓	<ul style="list-style-type: none"> <li>The proposal forms part of the full review of the ODP, the purpose of which is to ensure that resource management issues affecting the urban city centre area are appropriately addressed.</li> <li>It has been identified that the ODP does not provide sufficient housing development capacity. It also does not implement the requirements of the NPS-UD, where Wellington as a Tier 1 urban environment under Policy 3 within its CCZ must enable building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensifications.</li> <li>In addition, the ODP provisions do not go far enough to enable planning decisions that contribute to well-functioning urban environments under Policy 1 of the NPS-UD.</li> <li>The ODP does align with the directions under the National Planning Standards and vision under Wellington's Spatial Plan.</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> <li>Wellington City Council as a Tier 1 authority must give effect to Policy 3 of the NPS-UD through an ISPP process that must be notified before 20 August 2022.</li> <li>Although the ODP has contributed to successful outcomes for the City Centre up until now, particularly with regards to public amenity and managing adverse effects, the current provisions are outdated. They do not reflect the current and future change occurring for the CCZ and Te Ngākau and future priorities around accommodating growth, quality design and residential amenity.</li> <li>There is some evidence to suggest that some ODP provisions are having adverse effects in relation to inefficient utilisation of City Centre sites and residential amenity.</li> <li>Some changes to ODP provisions including standards are of a technical nature arising from plan effectiveness monitoring. Others involve the imposition of new policy considerations and standards to address additional growth, amenity and quality design outcomes.</li> </ul>
Addresses a resource management issue			✓	<ul style="list-style-type: none"> <li>There is clear evidence of significant housing supply and affordability issues for Wellington City, and that the ODP does not provide sufficient housing development capacity to meet projected population growth.</li> <li>The proposal is centred on resource management issues relating to accommodating growth, providing housing choice, enabled urban form and scale, providing for social, economic and cultural wellbeing, maintaining and enhancing the quality and amenity of the CCZ and Te Ngākau Precinct and managing adverse effects.</li> <li>Although the area covered by the CCZ (including Te Ngākau) includes s6 RMA matters that present issues from a resource management perspective (e.g. coastal environment, historic heritage and natural hazards) these are</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				recognised and provided for in other chapters of the PDP.
Degree of shift from the status quo			✓	<ul style="list-style-type: none"> <li>• The proposed provisions for managing land use activities in the CCZ and Te Ngākau are comparable to the ODP approach, and they align with the National Planning Standards.</li> <li>• The proposed provisions to increase housing supply and provide for a changing urban environment are more significant, with the proposal representing a moderate to significant departure from the ODP, with the most noticeable changes being: <ul style="list-style-type: none"> <li>○ The introduction of the Te Ngākau Civic Square Precinct and removal of the Civic Centre Heritage Area;</li> <li>○ Increase in heights in Te Aro and along zone boundaries;</li> <li>○ The introduction of a minimum building height across the CCZ;</li> <li>○ Extension of the CCZ into Adelaide Road and pockets of Thorndon;</li> <li>○ Removal of the massing control;</li> <li>○ Changes to ground level carparking and demolition rules;</li> <li>○ Enabling more ground floor residential activity;</li> <li>○ Change to rule framework with no Discretionary or Non-Complying construction, additions or alteration activity status;</li> <li>○ Introduction of residential amenity controls; and</li> <li>○ Replacement of design excellence with COC mechanism.</li> </ul> </li> <li>• However, it must be acknowledged that these changes are mandated by the need for Council to meet its statutory obligations under the NPS-UD to enable an uplift in development capacity.</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> <li>Changes to address additional quality design, amenity, mana whenua, adverse effects and resilience outcomes represent a moderate shift from the status quo, with new standards.</li> </ul>
Who and how many will be affected/ geographical scale of effect/s			✓	<ul style="list-style-type: none"> <li>This factor scores moderate to high as the CCZ occupies a reasonably significant area of land in the City, and is the primary commercial and employment centre in the region.</li> <li>As shown through the feedback received throughout the Planning for Growth Programme, the issues of housing supply and residential amenity effects have a high level of public interest.</li> <li>Property owners and the development community will be affected by proposed changes to the CCZ and Te Ngākau provisions.</li> <li>The wider community, including the users of such areas (residents, workers and consumers) and adjacent residents will be affected by proposed changes to CCZ and Te Ngākau provisions.</li> </ul>
Degree of impact on or interest from iwi/ Māori		✓		<ul style="list-style-type: none"> <li>Specific advice has been received from Taranaki Whānui and Ngāti Toa Rangatira regarding the CCZ provisions, specifically regarding the Ahi Kā objective and policy (CCZ-O4 and CCZ-P7).</li> <li>These objectives and policies have been designed to acknowledge Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington). They acknowledge their cultural associations, and landowner and development interests.</li> <li>This is a more developed and specified objective and policy than in the ODP.</li> <li>This includes providing for the development of papakāinga, kaumātua housing and affordable Māori housing on mana whenua landholdings, recognising and managing development adjoining scheduled sites of significance to Māori, and collaborating on the design</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				and incorporation of traditional cultural elements into public space.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> <li>The CCZ and Te Ngākau will be subject to the ISPP process, thus enacted by the end of 2023.</li> <li>While the proposal represents a high degree of change, the associated impacts will be ongoing rather than immediate given the large number of factors, including those that sit outside the District Plan, that influence the economic drivers and the type of development that takes place across the city as well as when this will occur.</li> </ul>
Type of effect/s			✓	<ul style="list-style-type: none"> <li>This factor scores highly as there will be a high degree of impact on the social and economic wellbeing of the community, particularly in relation to enabling greater housing supply and housing choice.</li> <li>Changes to enable greater development capacity, amenity and quality design outcomes should, if effective, have a positive impact on the social, cultural, environmental and economic wellbeing of residents, workers and consumers as well as bringing better functionality, vitality and vibrancy to these areas.</li> <li>There will also be a range of permanent effects on built form in the CCZ and Te Ngākau, which will alter urban environment in this area over the medium to long term.</li> </ul>
Degree of risk and uncertainty		✓		<ul style="list-style-type: none"> <li>There is a low to moderate risk of adverse community reaction to the proposed provisions, with risk being more present along the CCZ interface with residential zones. However, this may be tempered with amendments made to the provisions post DDP submissions i.e. changes to zoning extent in Thorndon and lowering the recession plane adjoining character precincts.</li> <li>There is moderate risk of adverse reaction from property owners and the</li> </ul>



Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<p>development community where additional standards and consideration relating to amenity and quality design outcomes are concerned. However, this may be tempered with amendments made post DDP submissions, i.e. removal of the street edge height.</p> <ul style="list-style-type: none"> <li>• The degree of risk and uncertainty has been mitigated as far as possible through the extensive public consultation that has been carried out through the last 5 years of engagement leading up to notification of the PDP.</li> <li>• Engagement on the DDP attracted a significant number of submissions on the CCZ regarding a range of issues, as detailed in Appendix 2.</li> <li>• It is also noted that the CCZ and Te Ngākau are giving effect to the statutory direction set by the NPS-UD.</li> <li>• The degree of uncertainty associated with proceeding is low given the comprehensiveness of the information base.</li> </ul>

Overall, the scale and significance of the proposed provisions are considered to be medium - high for the following reasons:

- A high-level of change and large area and number of people potentially affected has been identified. There is clear evidence to support the need for change;
- There is clear higher order direction of how, when and where this change needs to be provided for through this District Plan review, with the proposal helping Council to achieve its obligations under the NPS-UD and National Planning standards and the Final WCC Spatial Plan and the Central City Spatial Vision, through reinforcing the Centres hierarchy;
- The proposal helps Council to meet its obligations under sections 6-8 of the RMA. Where proposed rules and standards may have some impact on s6 RMA matters (a)-(f) and (h), the CCZ and Te Ngākau provisions already recognise and provide mitigation and management measures in policies and standards. Proposed quality design and amenity provisions will assist Council in achieving its obligation under s7 (b), (c), (f) and (i) of the RMA;
- They will give effect to the RPS by encouraging a more compact and sustainable urban form and recognising and managing activities that may have adverse impacts;
- Changes to ODP provisions represented by the proposal will 'release' current constraints on development yield, enable more efficient utilisation of CCZ land, accommodate greater residential growth and improve the amenity and design outputs of development to the benefit of resource users – as directed by NPS-UD.

- The proposal will impose new and more onerous standards focused on amenity and design-led outcomes for resource users than exists at present. However, these changes will ultimately be beneficial for those living in the CCZ and provide clear direction for landowners and plan users.
- Effects will be ongoing rather than immediate given the large number of factors that influence the type of development that takes place across the city, and as well as when this will occur; and
- There has been extensive public consultation and awareness of the issues for the residential areas through the last 5 years of engagement leading up to notification of the PDP.

Consequently, a medium-high level evaluation of these provisions has been identified as appropriate for the purposes of this report as detailed in section 6.2. Given the degree of change and significance, the Council has commissioned a series of reports which are available for reference and have been used to inform the scale of significance for change in CCZ and Te Ngākau. These reports have also helped to inform objectives and evaluation methods.

Waterfront Zone and Stadium Zone:

<b>Criteria</b>	<b>Scale/Significance</b>			<b>Comment</b>
	<b>Low</b>	<b>Medium</b>	<b>High</b>	
Basis for change		✓		<ul style="list-style-type: none"> <li>• The proposal forms part of the full review of the ODP, the purpose of which is to ensure that resource management issues affecting the waterfront and stadium areas are appropriately addressed.</li> <li>• It has been identified that the ODP does not go far enough to enable planning decisions that contribute to well-functioning urban environments under Policy 1 of the NPS-UD. The waterfront technically falls within the walkable catchment of the city centre. Under Policy 3(c)(ii) of the NPS-UD it directs district plans to enable building heights of at least 6 stories. However, the WFZ current approach has been retained due to qualifying matters as identified in section 9.</li> <li>• The ODP does sufficiently align with the vision under He Mahere Mokowā mō Pōneke - a Spatial Plan for Wellington City.</li> <li>• Although the current provisions for the Wellington Regional Stadium and Lambton Harbour Area have been identified as generally working effectively as intended, further adjustments have been introduced to comply with the</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<p>National Planning Standards and to improve their effectiveness relative to issues identified.</p> <ul style="list-style-type: none"> <li>Wellington regional stadium will continue to operate efficiently and effectively as a multi-purpose facility. Land use and development in the Waterfront will continue to contribute to Wellington's identity and sense of place.</li> </ul>
Addresses a resource management issue	✓			<ul style="list-style-type: none"> <li>The area covered by the WFZ and STADZ includes s6 RMA matters (e.g. coastal environment, historic heritage and natural hazards).</li> <li>These are addressed in the STADZ and WFZ and also other chapters of the PDP. The proposal is centred on resource management issues relating to: <ul style="list-style-type: none"> <li>Providing for mana whenua recognition and involvement,</li> <li>Enabling a mix of activities,</li> <li>Enabling the stadium to operate effectively,</li> <li>Managing urban form, development and scale impacts,</li> <li>Resilience to climate and natural hazard impacts,</li> <li>Protecting public open space, providing for social, economic and cultural wellbeing,</li> <li>Maintaining and enhancing the quality and amenity of the zones and managing adverse effects.</li> </ul> </li> </ul>
Degree of shift from the status quo	✓			<ul style="list-style-type: none"> <li>The proposal represents a minor-moderate departure from the ODP, for both the STADZ and WFZ the current ODP provisions have been largely carried over with some updates made to respond to identified issues.</li> <li>The most noticeable changes being: <ul style="list-style-type: none"> <li>Changes to zone frameworks to align with National Planning Standards and consequent improvements to plan usability that will reduce inefficiencies;</li> <li>For the WFZ:</li> </ul> </li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> <li>▪ a targeted zone framework (separating it from the CCZ structure);</li> <li>▪ the introduction of three specific controls and associated rules (areas of change, public open spaces and Queens Wharf buildings) which are current ODP controls but now align with the National Planning Standard's spatial tools;</li> <li>▪ mana whenua objectives, policies and methods;</li> <li>▪ rules discouraging ground floor carparking; and</li> <li>▪ the introduction of new standards relating to minimum sunlight access and residential amenity.</li> </ul> <ul style="list-style-type: none"> <li>○ For the STADZ <ul style="list-style-type: none"> <li>▪ a targeted zone framework (separating it from the CCZ structure);</li> <li>▪ introduction of a comprehensive stadium activities definition; and</li> <li>▪ enabling stadium activities rule for primary and ancillary activities, targeted objectives and policies including recognising and protecting the Fran Wilde Walkway.</li> </ul> </li> </ul> <ul style="list-style-type: none"> <li>• The WFZ aligns with the Waterfront Framework and brings in core principals and policy direction into the PDP from the framework to give it more weight.</li> </ul>
Who and how many will be affected/ geographical scale of effect/s		✓		<ul style="list-style-type: none"> <li>• The WFZ and STADZ do not occupy a significant footprint of land in the City.</li> <li>• The feedback received throughout the Planning for Growth Programme showed that the issues of housing supply and residential amenity effects have a high level of public interest. This affects the</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<p>WFZ with its provision of residential developments to limited degree and not the STADZ.</p> <ul style="list-style-type: none"> <li>• These are areas of significant importance to Wellington and high public interest. Both the Stadium and Waterfront contribute to the city's identity, sense of place, and social, economic, environmental and cultural wellbeing.</li> <li>• However, no significant changes are proposed.</li> <li>• Property owners and the development community will be affected by proposed changes to the WFZ provisions in only a minor manner due to the majority of bulk and form controls being ODP provisions including the zero height limit retention. Some minor residential amenity changes. No bulk and form changes are proposed for the stadium so the impact will be very minor.</li> <li>• The wider community, including the users of such areas (residents, workers, tourists and consumers) and adjacent residents will be positively affected by proposed changes to WFZ and STADZ through enabled activities, public open space and connections being protected and careful management of urban form and scale.</li> </ul>
Degree of impact on or interest from iwi/ Māori		✓		<ul style="list-style-type: none"> <li>• No specific advice has been received from Taranaki Whānui or Ngāti Toa Rangatira regarding this proposal for the STADZ. However, STADZ-P6 seeks that use and development in the STADZ recognises and has regard to the cultural, spiritual and historical values and interests and associations of importance to tangata whenua and other Māori, including scheduled sites and areas of significance.</li> <li>• Specific advice has been received from Taranaki Whānui and Ngāti Toa Rangatira regarding the WFZ provisions, specifically regarding the zone introduction, Ahi Kā objective and policy (WFZ-O2 and WFZ-P10) and method</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<p>WFZ-M1 Mana whenua involvement in managing the Waterfront Zone.</p> <ul style="list-style-type: none"> <li>• These objectives and policies have been designed to acknowledge Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington).</li> <li>• This is a more developed and specified approach than in the ODP for the Lambton Harbour Area, which does have existing policies. This includes managing new development adjoining scheduled sites and areas of significance to Māori, and collaborating on the design and incorporation of Māori cultural elements into public space within the zone.</li> <li>• WFZ-M1 requires applicants to include a record of engagement with Te Aro Pā Trust and Ngāti Toa Rangatira with the application for resource consent or request for private plan change.</li> </ul>
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> <li>• Changes effected by the proposed provisions will be experienced over the longer term (i.e. the operative life of the proposed plan). However, the nature of associated effects is likely to be intermittent given that no substantial development is anticipated in the STADZ, that there has been a lot of recent WFZ development but only two areas of change remain to be developed with no identified plans for development at present.</li> <li>• Some parts of the WFZ will be subject to the ISPP process, thus enacted by the end of 2023. The rest of WFZ and all of STADZ will be subject to the Part One Schedule 1 process, which will take longer to enact.</li> </ul>
Type of effect/s		✓		<ul style="list-style-type: none"> <li>• This factor scores on a minor scale for the STADZ due the lack of changes to bulk and form controls. However, the zone framework allows the Stadium to continue to function as a multi-purpose facility and permits more primary and ancillary</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<p>activities and better connectivity with surrounding environments which positively impact the wellbeing of people and communities.</p> <ul style="list-style-type: none"> <li>For the WFZ, this is minor to moderate, as there will be a minor to moderate degree of impact from changes to enable more amenity, resilience and quality design outcomes which should, if effective, have a positive impact on the social, cultural, environmental and economic wellbeing of residents, workers and consumers as well as bringing better functionality, vitality and vibrancy to these areas.</li> <li>This is enabled through bringing in controls from the Waterfront framework including standards for WFZ site coverage, provisions regarding areas of change, managing development on public spaces and increasing residential amenity.</li> </ul>
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> <li>The proposal is largely a 'roll over' of relevant provisions in the ODP for the Stadium and the Waterfront, with feedback to date and analysis of monitoring data indicating that the current provisions are generally working as intended.</li> <li>Engagement on the DDP attracted a relatively small number of submissions on the WFZ, which largely focused on support for retention of current height limit (either 'zero' or the height of existing buildings), managing adverse effects, involving mana whenua, public involvement in decision making, and protection of public space.</li> <li>Only one submission, in support, was received for the STADZ.</li> </ul>

Overall, the scale and significance of the proposed provisions are considered to be low-medium for the following reasons:

- The proposed provisions seek to protect s6 RMA matters through their policy framework and through WFZ standards, in particular the protecting the coastal environment, historic heritage, public access, the relationship of mana whenua to their

culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga and management of risks from natural hazards through buildings resilience;

- The proposed provisions will assist the Council in achieving its obligations under s7 (b), (c), (f) and (i) of the RMA by contributing to amenity values in the city, maintaining and enhancing the quality of the environment and managing the effects of climate changes;
- They have been introduced to comply with the National Planning Standards and to improve their effectiveness relative to the resource management issues identified.
- They will give effect to the RPS by encouraging a more compact and sustainable urban form and recognising and managing activities that may have an adverse impact on the aesthetic values of the zones.
- They provide clear direction on the outcomes sought in relation to amenity and the quality of the waterfront and coastal environment and therefore greater certainty for landowners and plan users.
- They present a low-level risk as they are largely a 'roll over' of the current approach applied to managing activities in the Lambton Harbour and Stadium areas in the ODP, particularly at a rule/standards level.

Consequently, a high level evaluation of these provisions has been identified as appropriate for the purposes of this report.

## 6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

### **Retail and Market Assessment for Wellington City Council**

The report "*Retail and Market Assessment for Wellington City Council (June 2020)*" should be read in conjunction with this Section 32 Evaluation. This report was commissioned by WCC in order to provide a retail and market assessment of the Centres Zones within the District Plan.

This report was needed to help WCC understand the current state of the market and the future state based on supply and demand trends. Ultimately the assessment was to assist the evidentiary basis of the controls proposed for business and commercial activity.

The report advised that demand for residential floorspace across the city centre increases the marginal cost of constraints or controls. It advised that to reduce these costs WCC could relax controls on density i.e. such as maximum height restrictions, extend the Central Area zone, apply more flexible zone provisions and facilitate mixed use development to increase residential capacity. This would provide the potential benefit of increased capacity and potential cost to amenity of impacts on sunlight, views and amenity. Additional floorspace for retail was not needed.

The report also advised that a mix of retail providers or large public areas can activate streets in a way in which residential premises cannot. This supports retail at the ground level. The report acknowledged that large format retail is likely to be cost prohibitive for the city centre,



including service stations and large supermarkets. The report encouraged council to promote greater efficiency of existing floorspace first rather than allocating for just retail activities.

To enable greater density the report advised WCC to:

- Relax maximum height restrictions across much of the CCZ, noting that relaxing maximum building height restrictions would increase capacity within the zone, increasing density and reducing the city footprint.
- Consider whether minimum building height should be implemented or not. They identified the potential benefits of possible increases in capacity under certain conditions but that impacts are uncertain – capacity could fall in some cases being contingent on the business environment. Minimum building heights may have some limited impacts on the efficiency of land use. But it is also possible for unintended consequences of a reduction in floorspace where developers delay construction.
- The report advised that low-grade office buildings, which have become financially unviable, are prime conversion targets, particularly in residential appeal areas such as Te Aro. Conversions improve land use efficiency, reducing the cost of residential space while increasing the viability of higher-quality new office developments. This will also drive resident population growth, which will provide a modest boost to demand for retail in the CBD.

The report also reviewed the benefits and costs of extending the CCZ into Thorndon and Adelaide Road. It found that:

- The change in zoning would permit greater intensification and the development of a wider range of properties within Thorndon, including commercial and residential.
- The primary inhibitor to development in the Thorndon extension area is the current pattern of fractured land ownership within the area and low foot traffic, challenging any large-scale development that needs to compete with development elsewhere in the city.
- Instead, proposed zoning changes for Adelaide Road that allow for more intensive development, will accelerate change from light industrial activities to high end uses. Expect mixed used development with ground floor retail to lift quality of the building stock in the area. Population growth will support existing and new retail development.

### **Proposed Amenity and Design Provisions:**

The report “*Proposed Amenity and Design Provisions – Cost Benefit Analysis (June 2022)*” should be read in conjunction with this Section 32 Evaluation.

The above report was commissioned by WCC in order to understand the costs associated with the new CCZ and residential zone provisions.

The report assessed the new CCZ zone standards using case studies on a range of sites across the CCZ in terms of direct impact on development costs and what this means for development feasibility. Costs to the economy included increased direct cost of housing per household in terms of loss of rental income, increased costs for households unable to occupy future units due to reduced yield and impact on agglomeration benefits i.e. risk of residents having to live further away.

This report also considered the value increased residential amenity has on a development and its contribution to the revenues that can be generated. It found that a high standard of development with good amenity would also support a higher price point achievable for each apartment.

In terms of benefits, the assessment demonstrates that providing a residential development with a high level of amenity is not only linked to health and wellbeing benefits for residents directly, but it also contributes to broader community, environmental and urban character benefits. Benefits to solar access, provision of open space, privacy, outlook, more functional living spaces and broader benefits such as reduced carbon emissions from less car use.

The analysis demonstrates that in most cases where the amenity provisions have been applied the development remains profitable.

The report also highlights a number of challenges facing the construction sector which are outside the scope and control of the District Plan.

### **Massing Issues and Options Report**

The report "*Wellington District Plan Review – Building Mass Control Provisions – Urban Design Report – Draft (October 2020)*" should be read in conjunction with this Section 32 Evaluation. Council commissioned this report to carry out an evaluation of the massing control provisions in the Central Area (Chapters 12 & 13). These provisions dictate the siting, design and appearance of new building developments within the Central Area so that the existing urban form is preserved and enhanced.

The report found that the current massing provisions generally work well in that they seem to be effective in managing effects on the surrounding environment. However, that is not always the case in relation to on-site amenity (e.g. daylight and outlook) - an issue that is most relevant for residential developments.

The report advised that WCC could acknowledge the importance of residential amenity for the successful outcome of the anticipated densification of the City Centre through new Plan provisions. The report recommended four high-level options for massing provisions each with benefits and costs considered, with the options including:

- Status quo - Retain the current provisions and translate them over the proposed increased building heights; or
- Retain the current mass standard but introduce appropriate on-site amenity provisions for residential activity to be applied in combination with the mass standard; or
- Utilise a site-specific approach to massing controls; or
- Introduce alternative methods for managing building mass.

With regard to on-site amenity provisions for residential activity the report noted that the benefits would include addressing residential amenity, a matter which would become more important under anticipated densification and increased heights.

The report advised that appropriate amenity controls for residential activity (daylight, outlook, privacy, with emphasis on amenity of main living areas) would need to be developed and incorporated into the new District Plan provisions under this option.

Possible costs from on-site amenity controls could include potentially reducing development potential (especially on internal sites) which could be seen as a hurdle to densification. The

report noted that relaxing discretion over height breaches could be a way to counterbalance potential loss of development potential.

### **Jasmax modelling of standards**

In addition to internal modelling of PDP standards, external WCC District Plan tests were undertaken by Jasmax. The testing scenarios “WCC District Plan Tests (October 2021)” should be read in conjunction with this Section 32 Evaluation. The testing undertaken created different development scenarios for various sites across the CCZ and the MCZ and tested different CCZ standards to understand the benefits and costs of potential developability of sites under these standards.

These tests provided an understanding of potential yield, mixes of housing provision, how the outdoor living spaces could be provided and the number of dwellings possible with the minimum unit sizes. The testing identified the costs created from the use of street edge height controls in terms of the ground floor area (GFA) loss potential. The testing identified particular concerns with use of this control for some inner city sites that are narrow or have multiple street frontages which could lead to a loss in development potential.

In addition to the report referred to above, the later evaluation sections of this report (Sections 11 and 12) also provide a qualitative assessment of the costs and benefits associated with the new CCZ provisions. Overall, it is considered the benefits significantly outweigh the costs.

## **7.0 Zone Framework**

Based on the issues analysis in section 5.3 of this report and the National Planning Standard zone options set out in section 4.4.5 the following zone framework has been selected in relation to this topic:

<b>Zone</b>	<b>Reason/s</b>
<i>City Centre Zone (supplemented by a precinct applying to Te Ngākau)</i>	<ul style="list-style-type: none"> <li>• This option has been selected as it represents the most applicable zone category to cover a mixture of activities within this area.</li> <li>• This area of the district plan is consistent with the description of City Centre Zone under Section 8: Zone Framework Standard of the National Planning Standards.</li> <li>• The CCZ is considered the most appropriate zoning to cover the city’s primary commercial centre and densest urban environment, as it provides for a wide range of housing types, associated activities and services and built forms to meet housing demands and the highest scale of development of all the zones.</li> <li>• The CCZ reinforces the ODP’s Centres hierarchy and identifies the CCZ as the primary commercial, retail and business area.</li> <li>• The CCZ also provides an appropriate distinction from the areas of the wider central city, currently included as Central Area under the ODP, below and the increased scale of development that is provided for in the CCZ compared to these zones.</li> <li>• The option of applying a specific precinct to Te Ngākau has been selected, rather than carrying through the ODP’s Civic Centre Heritage Area, as it represents the most applicable approach to</li> </ul>

	<p>enabling redevelopment of the precinct in accordance with the Te Ngākau Precinct Framework and the most applicable approach to managing the distinct character and amenity of the area and civic function relative the current ODP approach.</p>
<p><i>Special Purpose Waterfront Zone (WFZ)</i></p>	<p>Six different spatial approaches were considered for managing the Waterfront environment. These are discussed below:</p> <p><u><i>City Centre Zone:</i></u></p> <p>The Waterfront is managed as an ‘area’ within the ODP Central Area. The equivalent spatial layer in the Standards is a ‘precinct’ in the City Centre Zone. It would be impractical to manage the area in this way, primarily because of the NPS-UD.</p> <p>In city centre zones, the NPS-UD requires district plans to enable, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification. This is inconsistent with the vision for the Wellington Waterfront.</p> <p>To achieve the “<i>beautiful and inspiring spaces and architecture</i>” of the vision, and the Waterfront Framework’s other principles and objectives on prioritising public open space, lower building heights and design standards, WCC does not intend to maximise density and heights in this area.</p> <p>Auckland City Council has chosen to apply the City Centre Zone to its equivalent waterfront areas. These areas are much denser than Wellington’s waterfront, with tall buildings and greater site coverage. Auckland’s example is different to what Wellington has achieved on its waterfront. Wellington’s waterfront is a more open space with a mix of connected large parks and smaller plazas, and development that highlights and reflects the remaining heritage buildings and structures. The CCZ is impractical to manage the waterfront area.</p> <p><u><i>Open Space Zone (OSZ):</i></u></p> <p>An Open Space Zone has limited facilities and structures. However, the waterfront is defined by them: museums, wharf access, apartments, bars and cafes. The ODP provisions allow for buildings to take up to 35% of the land area.</p> <p>The Open Space Zone enables car parking to improve access for people to enjoy large open space public areas. The Waterfront has smaller public spaces with high public use and visibility. Car-parking is an inefficient use of space here because of the high demand, high land value, high amenity value, good public transport access, and conflict between vehicles and high pedestrian/multi-modal use.</p> <p>The Open Space Zone is impractical to manage the waterfront area.</p> <p><u><i>Mixed-Use Zone (MUZ):</i></u></p>

The waterfront does contain a compatible mixture of residential, commercial, light industrial, recreational and community activities. However, the MUZ is already being used in the district plan as a zone for enabling large numbers of mixed-use buildings with few design controls or building constraints. This is different from the purpose of the Waterfront Zone to be a highly controlled built environment, optimised for public use and enjoyment, with areas of public open space.

The MUZ is impractical to be applied to the waterfront area and be consistent with its use elsewhere in Wellington City.

*Special Purpose Port Zone (PORTZ):*

The ODP Lambton Harbour Area used to be the location where Wellington's port operated from. However, port activities have long since moved north to where the PDP PORTZ now applies. The Lambton Harbour Area now contains recreation, commercial and residential activities which are incompatible with anticipated port activities under the Operational Port Activities definition.

The Port Zone is now an impractical and inappropriate zoning for the waterfront area given the PORTZ provides for heavy industry, warehousing, and servicing of large ships.

*City Centre Zone with a Waterfront overlay:*

While this was practical in the past, the NPS-UD directives to maximise building density in the City Centre now means that this option is impractical as the directives would negatively impact upon the public space, recreation and place-making characteristics of the waterfront. These are core values to Wellingtonians and maximising development density here would be unacceptable to most of Wellington's communities.

*Special Purpose Waterfront Zone:*

- This option has been selected as it represents the most applicable zone category to recognise the area's strategic importance, provide for the waterfront activities within this area of the city. As well as the best zone framework to ensure development aligns with the Waterfront Framework, is of an appropriate form and scale for the waterfront environment and that the extensive public environment is protected and maintained and that Council works efficiently with GWRC and mana whenua across mean high water springs boundaries.
- The above discussion details why various other zones and spatial approaches were discounted for this area.
- The National Planning Standards allow for additional special purpose zones beyond those provided for in Table 4 of the standards. As per section 8 of the standards, using a WFZ meets the detailed criteria as Wellington's waterfront is significant to the city, region and country, it has been proven to be impractical to be

	managed through a different National Planning Standards zone or combination of spatial layers.
<i>Special Purpose Stadium Zone (STADZ)</i>	<ul style="list-style-type: none"> <li>• The National Planning Standards provide for a Stadium Zone as a Special Purpose Zone where consistent with the following definitions: <i>Areas used predominantly for the operation and development of large-scale sports and recreation facilities, buildings and structures. It may accommodate a range of largescale sports, leisure, entertainment, art, recreation, and/or event and cultural activities.</i></li> <li>• A STADZ as proposed is appropriate to replace the operative Central Area zone.</li> <li>• This option has been selected as it represents the most applicable zone category to cover stadium activities within the city, along with special entertainment events and to ensure the continued protection of the Fran Wilde Walkway to continue to provide connectivity between the stadium, waterfront, port and CCZ.</li> </ul>

The CCZ occupies a large, prominent area at the core of the city extending from Kaiwharawhara in the north to the interface with Mount Cook and Riddiford Street in the South. The CCZ covers Te Aro, Wellington Central, Pipitea and parts of Thorndon. Parts of the CCZ sit within the coastal environment. The CCZ is bordered by Medium Density Residential Zone, Tertiary Education Zone, WFZ, Stadium Zone and Port Zone. It also includes pockets of open space zone within its core which apply to the listed public spaces in Appendix 9.

The CCZ contains a variety of environments ranging from high-rise office towards and residential apartments through to distinct heritage area, open spaces, Old Government Buildings, Pipitea Marae and the Parliament Heritage Precinct. Also centrally located within the City Centre Zone is Te Ngākau Civic Square – a distinct civic precinct that abuts Victoria Street, Wakefield Street, Harris Street and Jervois Quay and acts as a key connector to the city’s waterfront. Te Ngākau is home to Wellington’s major civic and entertainment venues including but not limited to the Wellington Town Hall, City Gallery Wellington (Te Whare Toi), Wellington City Library (Te Matapihi) and Michael Fowler Centre.

The WFZ provides an interface between the city centre and Te Whanganui-a-Tara. It contains one of the city’s primary promenades along with two major parks: Frank Kitts Park and Waitangi Park. It includes buildings such as Te Papa, Te Wharewaka o Pōneke and the Events Centre along with residential apartment living. The Waterfront Zone covers the ODP’s Lambton Harbour Area extent.

The STADZ covers the Wellington Regional Stadium as well as the Fran Wilde Walkway which connects the Stadium to the Waterfront, Railway Station and City Centre.

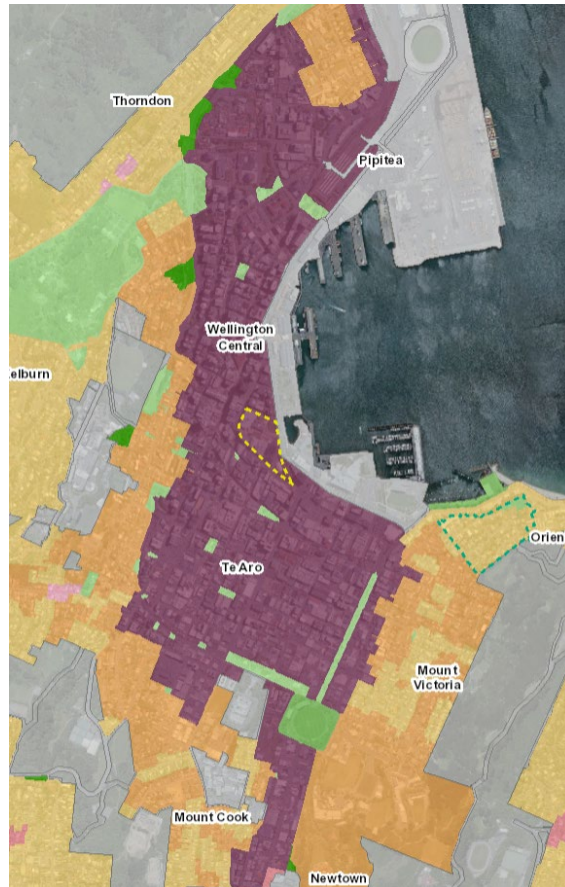


Figure 1: Extent of the CCZ (shown in purple), WFZ (shown in grey), STADZ (shown in grey to the north) and Te Ngākau (shown in yellow hatch lines).

## 8.0 Overview of Proposal/s

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report.

In summary, the proposed provisions include:

### City Centre Zone

- Definitions
  - A set of relevant definitions, including:
    - Community Activities
    - Industrial Activities
    - Yard-based Retail Activities
    - Heavy Industrial Activities
    - Comprehensive Development
    - Development Capacity
    - Active Frontage
    - Marae
    - Public space
    - Reverse sensitivity
    - Rapid Transit Stops
    - Community Facility

- Well-functioning Urban Environment
  - Transport Network
  - Residential Activity
  - Education Facility
  - Arts, Culture and Entertainment Activities
  - Community Corrections Activities
  - Public Transport Activities
  - Visitor Accommodation
  - Repair and Maintenance Services
  - Recreational Activities
  - Ground level
  - Demolition
  - Vacant land
  - Adaptive Re-use
  - Assisted Housing
  - Streetscape
  - Outdoor Living Space
  - Amenity values
  - Functional Needs
  - Operational Needs
  - Net Floor Area
  - Habitable Room
- 7 Objectives that address:
  - The purpose of the City Centre Zone – being that it continues to be the primary commercial and employment centre servicing Wellington and the wider region, supported by residential and a diverse mix of other compatible activities that reflect its role and function in the hierarchy of centres.
  - Accommodating residential, business and supporting community service growth, and having sufficient serviced development capacity to meet its short, medium and long term residential and business growth needs.
  - The scale and form of development in the City Centre Zone.
  - Taranaki Whānui and Ngāti Toa Rangatira are acknowledged as the mana whenua of Te Whanganui ā Tara (Wellington).
  - Development in the City Centre Zone positively contributing to creating a high quality, well-functioning urban environment.
  - Activities and development near existing and planned rapid transit stops.
  - Effective management of adverse effects.
- 12 Policies that:
  - Enable a range and diversity of activities that support the purpose and ongoing viability of the City Centre Zone and enhances its vibrancy and amenity.
  - Only allow potentially incompatible activities where they will not have an adverse effect on the vitality, vibrancy and amenity of the Zone, and avoiding heavy industrial activities.
  - Enable high density, good quality residential development that achieves a high standard of amenity that reflects and responds to the evolving, higher density scale of development.
  - Recognise the benefits of intensification by enabling greater overall height and scale of development and requiring efficient optimisation of development capacity.



- Encourage new development and redevelopment in the City Centre Zone that is sustainable, resilient and adaptable to change in use over time.
  - Recognise and enable Taranaki Whānui and Ngāti Toa Rangatira cultural associations and landowner and development interests.
  - Provide for good quality new development and supporting public space that reinforces the City Centre's identity and unique sense of place at a city scale.
  - Require new development, and alterations and additions to existing development, at a site scale to positively contribute to the sense of place and distinctive form, quality and amenity.
  - Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guide guideline G107.
  - Recognise the evolving, higher density development context anticipated in the City Centre Zone, while managing any associated adverse effects.
- A rule framework that manages land use and building and structure activities as follows:
    - Land use activities
      - Commercial activities – permitted.
      - Community facilities – permitted.
      - Educational facilities – permitted.
      - Recreation activities – permitted.
      - Art, culture, and entertainment activities – permitted.
      - Emergency service facilities – permitted.
      - Marae activities – permitted.
      - Community corrections activities – permitted.
      - Public transport activities – permitted.
      - Visitor accommodation activities – permitted.
      - Repair and maintenance service activities – permitted.
      - Residential activities – permitted where located above ground floor, or at ground level where not along an active frontage or street requiring verandah coverage, or withing a Natural Hazard Overlay, or otherwise discretionary.
      - Industrial activities – restricted discretionary.
      - Heavy industrial activities – non-complying.
      - Carparking activities – permitted in certain situations or otherwise discretionary.
      - Yard-based retailing activities – discretionary.
      - All other activities – discretionary.
    - Building and structure activities
      - Maintenance and repair – permitted.
      - Demolition or removal – permitted in certain situations or otherwise non-complying.
      - Additions and alterations – permitted where any new building or structure does not alter the external appearance, is below verandah level, does not result in the creation of new residential units, are not visible from public spaces and comply with the relevant standards, or otherwise restricted discretionary.

- Construction – permitted where any new building or structure will have a gross floor area of 100m<sup>2</sup> or less and a building coverage of no more than 20 percent, and complies with the relevant standards. Otherwise restricted discretionary except where the minimum building height standard is not complied with and construction becomes non-complying.
  - Conversion of buildings, or parts of buildings, for residential activities – restricted discretionary.
- A complementary set of effects standards that address:
  - Maximum height that varies by height control areas
  - Old St Paul’s Church – Adjoining site specific building height
  - Character precincts and Residentially Zoned heritage areas
  - Adjoining site specific building and structure height
  - Minimum building height
  - Minimum ground floor height – 4m
  - Minimum sunlight access – public space
  - Verandahs
  - Active frontage control
  - Minimum residential – unit size
  - Residential – outdoor living space
  - Minimum separation distance
  - Maximum building depth
  - Outlook space.
- Design guides:
  - CCZ-P11 City outcomes contribution refers to Centres and Mixed-Use Design Guideline G107 specifically. This houses the direction for implementing this mechanism.
  - The CCZ rule framework for construction of a new building and additions and alterations to existing buildings lists the Centres and Mixed-Use Design Guide and the Residential Design Guide as matters of discretion.
  - The CCZ rule framework for conversions of buildings, or parts of buildings, for residential activities lists the Residential Design Guide as a Matter of Discretion.
- Appendices:
  - The CCZ rule framework (specifically CCZ-S6 Minimum sunlight access – public space) refers to Appendix 9. Appendix 9 sets out the CCZ and WFZ – Minimum sunlight access and wind comfort control – public space requirements. This appendix relates to and is to be read in conjunction with CCZ-S6, WFZ-S2 and WIND-S3 – minimum sunlight access and wind comfort – public space standards.
  - This appendix lists all the public spaces that these controls apply to, what zone they are located within i.e. CCZ or WFZ (despite some of these having open space zoning themselves) and the time period to be calculated using New Zealand Standard Time at either equinoxes (i.e. 21 March or 23 September). For example, Cuba Mall 11:30am-1:30pm.

### **Te Ngākau Civic Square Precinct**

- Definitions
  - A set of relevant definitions, including:
    - Arts, culture and entertainment activities
- 3 Objectives that address:

- The purpose of the precinct as a vibrant, safe, resilient, connected and inclusive environment supported by a range of activities that complement its primary civic function.
- Scale, form and positioning of development within the Precinct including to reinforces the distinctive form and scale of existing associated historic heritage buildings, architecture and public space.
- Integration with the City Centre, Waterfront and wider transport network.
- 4 Policies that:
  - Enable a range of activities and temporary events that support the civic purpose and ongoing vibrancy and amenity of the Precinct.
  - Provide for the staged redevelopment of the Precinct, and its connections with the transport network, wider City Centre Zone and Waterfront Zone.
  - Require new use and development is accessible and connected to existing and planned transport networks and provides well-designed, safe and accessible public and green open space.
  - Require development within the Precinct to contribute positively to its visual quality, amenity, interest and public safety.
- A rule framework that manages land use and building and structure activities as follows:
  - Land use activities
    - Civic activities – permitted.
    - Arts, culture and entertainment activities – permitted.
    - Community activities – permitted.
    - Commercial facilities – permitted.
    - Recreation activities – permitted.
    - Residential activities – permitted where located above ground floor.
    - All other activities – discretionary.
  - Building and structure activities
    - Construction, additions and alterations – restricted discretionary with public notification status.
- A complementary set of effects standards that address:
  - Maximum height – 40m.
- Design guides:
  - The Te Ngākau rule framework for construction of a new building and additions and alterations to existing buildings lists the Centres and Mixed-Use Design Guide and the Residential Design Guide as matters of discretion.

#### **Stadium Zone:**

- Definitions
  - A set of relevant definitions, including:
    - Landmark
    - Sensitive Activities
    - Stadium activities
    - Special entertainment events
- 4 Objectives that address:
  - The stadium's efficient and effective operation as a multi-purpose facility that contributes to the economic, social, and cultural wellbeing of the local and regional community.

- The positive contribution of the development in the Stadium Zone to a well-functioning urban environment as a landmark building within the cityscape.
- The retention and enhancement of the Fran Wilde Walkway.
- The appropriate management of adverse effects.
- 6 Policies that:
  - Enable stadium activities and provide for compatible activities.
  - Require that the use, development, and operation of the stadium is accessible and connected, including providing for access and connections to other transport modes and networks, and maintaining and enhancing the Fran Wilde Walkway.
  - Require new development to positively contribute to the quality and amenity of the Stadium Zone and adjoining zones and have regard to the cultural and historical significance of the area.
- A rule framework that manages land use and building and structure activities as follows:
  - Land use activities
    - Stadium activities – permitted.
    - All other activities – discretionary.
  - Building and structure activities
    - Maintenance, repair, demolition or removal – permitted
    - Construction, additions and alterations – permitted where the building or structure is not visible from public spaces and compliant with the standards, or otherwise restricted discretionary.
    - Demolition or removal – permitted in certain situations or otherwise discretionary.
- A complementary set of effects standards that address:
  - Maximum height – 60m (lighting towers associated with the stadium) and 27m (all other buildings and structures)
  - Site access.

### **Waterfront Zone:**

- Definitions:
  - A set of relevant definitions, including:
    - Community Activities
    - Industrial Activities
    - Yard-based Retail Activities
    - Heavy Industrial Activities
    - Comprehensive Development
    - Development Capacity
    - Active Frontage
    - Marae
    - Public space
    - Reverse sensitivity
    - Rapid Transit Stops
    - Community Facility
    - Well-functioning Urban Environment
    - Natural Hazards
    - Pedestrian
    - Transport Network
    - Residential Activity
    - Education Facility
    - Arts, Culture and Entertainment Activities
    - Community Corrections Activities
    - Public Transport Activities

- Visitor Accommodation
  - Repair and Maintenance Services
  - Recreational Activities
  - Ground level
  - Vacant land
  - Adaptive Re-use
  - Assisted Housing
  - Streetscape
  - Outdoor Living Space
  - Amenity values
  - Functional Needs
  - Operational Needs
  - Net Floor Area
  - Habitable Room
  - Temporary Activities
  - Maritime
  - Coastal Hazard.
- 7 Objectives that address:
  - The purpose of the Waterfront Zone – to contribute to Wellington’s identity and sense of place, with public spaces, buildings and other structures that reflect the unique and special components and elements that make up the waterfront.
  - Taranaki Whānui and Ngāti Toa Rangatira are acknowledged as the mana whenua of Te Whanganui a Tara (Wellington).
  - Protection of public open spaces, including for temporary activities and recreation activities.
  - Redevelopment of areas of change into high-quality public spaces and buildings.
  - Active transport and micro-mobility connections between the edge of Te Whanganui-a-Tara, public transport and the City Centre.
  - A diverse and vibrant mix of activities that collectively provide and encourage public interest, use and enjoyment of the Zone during the day and night.
  - The appropriate management of adverse effects.
- 10 Policies that:
  - Enable a range and diversity of activities that support the role and function of the Waterfront Zone and enhance the Zone’s vitality, vibrancy and amenity during the day and night.
  - Manage the location and scale of activities which could result in cumulative adverse effects on the vitality, vibrancy and amenity of the Waterfront Zone.
  - Avoid activities that are incompatible with the role and function of the Waterfront Zone.
  - Require that the use, development, and operation of the Waterfront Zone provides attractive, safe and efficient access, connections and public space.
  - Require development of public spaces, buildings and other structures to maintain or enhance the sense of place and distinctive form, quality and amenity of the Waterfront Zone.
  - Require new and altered buildings to be of a high quality.
  - Protect public open spaces.
  - Enable re-development of Areas of Change from car parking to high quality buildings and/or public spaces.
  - Encourage new development and redevelopment in the Waterfront Zone to be sustainable, resilient and adaptable to change in use over time.

- Recognise and provide for the cultural associations and development interests of Ngāti Toa Rangatira and Taranaki Whānui ki te Upoko o te Ika in the Waterfront Zone.
- 2 Methods that address:
  - Mana whenua involvement in managing the Waterfront Zone
  - Integrated management across mean high water springs
- A rule framework that manages land use and building and structure activities as follows:
  - Landuse activities
    - Commercial activities – permitted.
    - Community facilities – permitted.
    - Recreation activities – permitted.
    - Emergency service facilities – permitted.
    - Marae activities – permitted.
    - Public transport activities – permitted.
    - Visitor accommodation activities – permitted.
    - Residential activities – permitted where located above ground floor, otherwise non-complying.
    - Industrial activities – restricted discretionary.
    - Heavy industrial activity – non-complying.
    - Carparking activities – permitted in certain situations, otherwise non-complying.
    - All other activities – discretionary.
  - Building and structure activities
    - Maintenance, repair, and public open spaces – permitted
    - Demolition or removal – permitted in certain situations or otherwise non-complying.
    - Additions and alterations – varies dependant on location in the zone.
    - Construction – varies dependant on location in the zone.
    - Development of new public space, or modification of existing public open space in the Public Open Space – discretionary.
    - Conversion of buildings or parts of buildings to residential activities – restricted discretionary.
- A complementary set of effects standards that address:
  - Maximum building height outside of Public Open Space and Areas of Change
  - Minimum Sunlight Access - Public Space
  - Outlook space (per residential unit)
  - Minimum residential unit size
  - Building separation distance
  - Waterfront Zone site coverage.
- Design guides:
  - The WFZ rule framework notes that for Restricted Discretionary, Discretionary and Non-Complying Activities for rules WFZ-R13 to WFZ-R17 the assessment of activities must have regard to the Principles and Outcomes in the Wellington City Council Design Guides Introduction [2022].
  - Additionally rule WFZ-R17 lists the Residential Design Guide as a Matter of Discretion.
- Appendices:
  - The WFZ rule framework (specifically WFZ-S2 Minimum sunlight access – public space) refers to Appendix 9. Appendix 9 sets out the CCZ and WFZ – Minimum sunlight access and wind comfort control – public space requirements. This appendix relates to and is to be read

- in conjunction with CCZ-S6, WFZ-S2 and WIND-S3 – minimum sunlight access and wind comfort – public space standards.
- This appendix lists all the public spaces that these controls apply to, what zone they are located within i.e. CCZ or WFZ (despite some of these having open space zoning themselves) and the time period to be calculated using New Zealand Standard Time at either equinoxes (i.e. 21 March or 23 September). For example, Kumutoto Park 12pm-2pm.

## 9.0 Qualifying Matters

For the purposes of preparing this evaluation report for the CCZ, WFZ, STADZ and Te Ngākau, Council is required, under section 77P(2) of the RMA, to satisfy the following in relation to applying a less permissive approach than that required under Policies 3(a)-(c) of the NPS-UD in an area to accommodate any of the qualifying matters listed in section 77O(a)-(i):

- (a) To demonstrate why –
  - (i) it considers that any area proposed is subject to a qualifying matter; and
  - (ii) the qualifying matter is incompatible with the level of development provided for in the other intensification policies; and
- (b) Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- (c) Assess the costs and broader impacts of imposing those limits.

Within the spatial extent of the area covered by CCZ, WFZ, STADZ and Te Ngākau, areas have been identified as subject to a qualifying matter. These include:

- Wellington Fault Overlay
- Liquefaction Hazard Overlay
- Coastal Hazard Inundation Overlay
- Coastal Hazard Tsunami Overlay
- Stream Corridor Overlay
- Overland Flowpath Overlay
- Ponding Overlay
- Heritage Buildings and Structures
- Notable Trees
- Heritage Areas
- Character Precincts (one Character Precinct is located within the High Density Residential Zone on the boundary with the CCZ along Hania Street)
- Sites of Significance to Māori
- Coastal Environment Overlay and Public Access
- Designations
- Transmission Lines and Transmission Lines Buffer
- Viewshafts
- Open Spaces (those with Open Space Zone zoning in the CCZ area as well as those in Te Ngākau)
- Public Open Space (Waterfront specific control separate to Open Space Zoned public spaces in the CCZ area)
- Noise

- Minimum Sunlight Access to Public Spaces.

An evaluation setting out how these areas meet the requirements outlined above is contained in the following supporting section 32 evaluation reports:

- Natural Hazards and Coastal Hazards
- Historic Heritage, Notable Trees, Sites and Areas of Significance to Māori
- Coastal Environment and Public Access
- Viewshafts
- Noise
- Infrastructure and Transport
- Character Precincts and Mt Victoria North Townscape Precinct.

The associated benefits, costs, effectiveness and efficiency of identifying these areas as a qualifying matter forms part of the evaluation of reasonably practicable options in section 11 of this report.

Qualifying matter analysis which is either in addition to analysis in the above reports, or is not addressed in the above report, for example the minimum sunlight access to public spaces in the CCZ and WFZ, is included within Appendix 3 of this report.

## **10.0 Evaluation of Proposed Objective/s**

### **10.1 Introduction**

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

### **10.2 Thematic approach to evaluation**

Given that this report covers three distinct zones and an associated precinct, common related objectives have been aggregated and grouped under the following themes for the purpose of this evaluation:

- General objectives:



- These objectives set the strategic directions for the three zones and precinct, and outline anticipated activities and key elements that contribute to making these areas unique.
- These objectives also acknowledge Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington), recognising their landowner and development interests in planning.
- Providing for anticipated growth and intensification:
  - The City Centre and the Waterfront areas are anticipated to experience noticeable change over time in response to projected growth, national direction to maximise development capacity (for the CCZ) and the need to more efficiently utilise land within these environments.
  - These objectives speak to accommodating population growth, enabling and managing urban form and scale to provide for this growth and development near rapid transit and providing for areas of change.
- Density done well – providing for amenity and managing effects:
  - Anticipated growth in inner city living and greater density of urban form requires a balance to be struck between intensification and ensuring buildings and spaces are designed to a good quality and contribute positively to public and residential amenity.
  - These objectives seek to provide for amenity and quality design outcomes, protect public open space, enable building resilience and manage adverse effects.

### **10.3 Evaluation of Objectives CCZ-01, CCZ-PREC-01, WFZ-01, WFZ-06, STADZ-01, CCZ-04, WFZ-02, WFZ-05, CCZ-PREC-03 and STADZ-03 (general objectives)**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objectives are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two sets of potential objectives:

1. The proposed objectives
2. The current most relevant objectives - the status quo.

<b>Proposed objectives CCZ-01, CCZ-PREC-01, WFZ-01, WFZ-06, STADZ-01, CCZ-04, WFZ-02, WFZ-05, CCZ-PREC-03 and STADZ-03</b>		
Ten objectives that address the purpose of each zone and precinct, appropriate activities within the zone concerned that complement its primary functions and identity, the role of the zones in accommodating growth and servicing needs, the acknowledgement of Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua and the need to provide for active transport and micro-mobility connections between different zones and precincts.		
<b>General intent:</b>		
<ul style="list-style-type: none"> <li>• To articulate the intended purpose of the CCZ, WFZ, STADZ and Te Ngākau.</li> <li>• To articulate what mix of activities are anticipated within the CCZ, WFZ, STADZ and Te Ngākau.</li> <li>• To acknowledge Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua of Te Whanganui ā Tara (Wellington) and their cultural associations, and landowner and development interests, particularly within the CCZ and WFZ.</li> <li>• To ensure safe and accessible pedestrian and micro-mobility connections between the STADZ, CCZ, WFZ and Te Ngākau are maintained or enhanced.</li> </ul>		
<b>Other potential objectives</b>		
<p>Status quo – eight directly relevant objectives in the ODP:</p> <ul style="list-style-type: none"> <li>• 12.2.1 To enhance the Central Area’s natural containment, accessibility, and highly urbanised environment by promoting the efficient use and development of natural and physical resources.</li> <li>• 12.2.2 To facilitate a vibrant, dynamic Central Area by enabling a wide range of activities to occur, provided that adverse effects are avoided, remedied or mitigated.</li> <li>• 12.2.3 Urban Form and Sense of Place - To recognise and enhance those characteristics, features and areas of the Central Area that contribute positively to the City’s distinctive physical character and sense of place.</li> <li>• 12.2.8 To ensure that the development of the Lambton Harbour Area, and its connections with the remainder of the city’s Central Area, maintains and enhances the unique and special components and elements that make up the waterfront.</li> <li>• 12.2.9 To support the use and development of the regional stadium so that it continues to contribute to the well-being of the local and regional community.</li> <li>• 12.2.12 To maintain and enhance access to, and the quality of the coastal environment within and adjoining the Central Area.</li> <li>• 12.2.15 To enable efficient, convenient and safe access for people and goods within the Central Area.</li> <li>• 12.2.16 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington’s tangata whenua and other Māori.</li> </ul>		
	<b>Preferred objective</b>	<b>Status quo</b>
<b>Relevance:</b>		
Addresses a relevant resource management issue	The preferred objectives directly address five clear issues:	The current objectives are generic in nature and seek to manage the Central Area as a ‘physical resource’ and address broader Part 2

	<ul style="list-style-type: none"> <li>• Recognising the variation in the types of environment that exist within the Central City by delineating and distinguishing the distinct, affiliated purposes of the CCZ, WFZ, STADZ and Te Ngākau Civic Square.</li> <li>• Maintaining the vibrancy and commercial vitality of the CCZ, WFZ, STADZ and Te Ngākau Civic Square, including the primacy of the City Centre as the region's major commercial and employment centre.</li> <li>• Having regard to the purpose of the RMA, namely the efficient use and development of physical resources.</li> <li>• Providing appropriate recognition and integration of mana whenua values into the CCZ and WFZ.</li> <li>• Providing ongoing activation, comfort, attractiveness and safety for active users (e.g. pedestrians, cyclists and e-scooter users) along key movement routes and public spaces that reinforce the roles and functions of the CCZ (i.e. premiere city/regional commercial area), WFZ, STADZ and Te Ngākau.</li> </ul>	<p>obligations. There is some recognition of the variation in types of environment that exist within the Central City, as exemplified by the specific objectives for Lambton Harbour Area and Wellington Regional Stadium.</p>
Assists the Council to undertake its functions under s31 RMA	The proposed objectives will assist the Council to undertake its functions under s31 of the RMA, particularly the integrated management of resources through controlling any actual or potential effects of the use and development of land in CCZ, WFZ, STADZ and Te Ngākau.	Although the objectives provide some direction to assist Council to undertake its integrated management function under s31 of the RMA, they lack sufficient clarity regarding the purpose of the CCZ, WFZ STADZ and associated Te Ngākau Precinct.
Gives effect to higher level documents	The proposed objectives give effect to higher level documents, particularly policies 1,2,3, 9 and 10 of the NPSUD, policy 6 of the NZCPS	Although the objectives give effect to the RPS and NZCPS they do not give sufficient effect to the NPS-UD and are less well aligned with

	and objectives 3-8, 22, 25-28 and related policies 31, 54, 57 and 49 RPS. They are also consistent with the purpose and principles of the RMA, particularly ss6(a), (d) and (e) and ss7(a), (b) and (f), reflect relevant directions in the National Planning Standards and align with the Mana Whenua Partnership, Vibrant and Prosperous and Inclusive and Connected goals and related directions in the Our City Tomorrow: A Spatial Plan for Wellington City.	relevant directions in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City.
<i>Usefulness:</i>		
Guides decision-making	<p>In conjunction with the proposed policies the proposed objectives will effectively guide decisions on resource consent applications as they provide clear direction regarding the purpose of the CCZ, WFZ, STADZ and associated Te Ngākau Precinct and the outcomes sought in relation to commercial and residential vitality, vibrancy and access within these areas.</p> <p>These are further supported by accompanying rules that clearly delineate those activities identified as compatible/incompatible with the purpose of the central city, waterfront and stadium areas.</p>	In conjunction with the policies the objectives in the ODP guide decisions on resource consent applications in a reasonably sufficient manner, but provide less clarity and direction regarding the purpose of the CCZ, WFZ, STADZ and Te Ngākau precinct. Some of the objectives also speak to district wide matters, contrary to relevant directions in the National Planning Standards.
Meets best practice for objectives	Identifying the purpose of the CCZ, WFZ, STADZ and Te Ngākau and associated outcomes aligns with current best practice and the intent underlying the National Planning Standards.	Unlike the preferred objectives the status quo objectives are more generic in nature and lack specificity concerning the outcomes sought. Although similar provisions were common in a number of 'first generation' district plans, these have generally been replaced in subsequent plan reviews or specific plan changes with clearer and more instructive provisions.
<i>Reasonableness:</i>		

<p>Will not impose unjustifiably high costs on the community/parts of the community</p>	<p>As these proposed objectives do not represent a radical departure from the current direction regarding purpose, primary activities and connectivity in the ODP it is unlikely that significant additional compliance costs will be incurred by landowners/ developers or the community to achieve the outcomes sought. The proposed objectives are intentionally enabling in nature to meet the requirements of the NPS-UD.</p>	<p>The existing objectives do not appear to have resulted in significant compliance costs being incurred by landowners/developers.</p>
<p>Acceptable level of uncertainty and risk</p>	<p>There is a high level of certainty around the proposal and its effects as the proposed objectives provide greater clarity of intent regarding the outcomes sought in the CCZ, WFZ, STADZ and Te Ngākau. The specific objectives do not radically depart from the current direction, they are specific, state what is to be achieved and are founded on a comprehensive information/evidence base.</p>	<p>There is a lesser degree of certainty around the existing objectives given their generic nature and lack of clear direction regarding the outcomes anticipated.</p> <p>The objectives are founded on a dated information/evidence base and are misaligned with the NPS-UD, National Planning Standards or Our City Tomorrow: A Spatial Plan for Wellington City direction, thereby increasing the level of uncertainty and risk associated with their retention.</p> <p>Some feedback on the DDP particularly supported new objectives in the CCZ which provided recognition of the City Centre as the primary centre serving the wider Wellington region, the creation of well-functioning urban environments and the recognition of the need to ensure the CBD is resilient to the risks of natural hazards and coastal hazards. This potentially suggests that some submitters feel that the current ODP Central Area objectives do not sufficiently address these matters and that there is a lack of certainty currently in the ODP.</p>
<p><i>Achievability:</i></p>		
<p>Consistent with identified tangata whenua and community outcomes</p>	<p>The proposed objectives have been drafted in conjunction with tangata whenua, particular the Ahi Kā objective, in order to support tangata whenua outcomes of recognition of their status as mana whenua and their cultural associations with the CCZ and WFZ, as well as their landowner and development interests. The intent to support</p>	<p>Although the proposed objectives include a broad directive to facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Māori, more specific aspirations identified through recent engagement with mana whenua are not reflected in the operative objectives.</p> <p>The objectives reflect community aspirations of a diverse mix of activities, recognising sites that add to the Central City's sense of place, and enabling safe pedestrian connections.</p>

	well-functioning urban centres reflects the aspirations of the general public and stakeholders.	
Realistically able to be achieved within the Council's powers, skills and resources	The objectives are realistically able to be achieved within the Council's powers, skills and resources, with any additional skills or resources required able to be sourced either in-house or on a contract basis.	The status quo objectives are currently being implemented within the Council's powers, skills and resources.
<b>Summary</b>		
<p>The proposed objectives provide clear direction regarding the respective roles that the CCZ, WFZ, STADZ and Te Ngākau precinct assume in the context of the PDP and the city more generally. They also set out the Council's expectations concerning the anticipated nature of activities within the zones and precinct that are consistent with their roles. Additionally, they provide acknowledgement of Mana Whenua's connection to the WFZ and CCZ in particular, as well as recognising the inter-relationship between these zones and encouraging greater connectivity between them.</p> <p>The above analysis indicates that the preferred objectives are the most appropriate way to achieve the purpose of the Act and the Council's functions under s31 RMA, give the greatest effect to the higher-level planning instruments, particularly the NPS-UD, align with the directional intent of the National Planning Standards and provide greater certainty for decision-makers and Plan users. They are also unlikely to result in significant additional administrative or compliance costs being incurred.</p>		

#### **10.4 Evaluation of Objectives CCZ-02, CCZ-03, CCZ-06 and WFZ-04 (providing for anticipated growth and intensification)**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objectives are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two sets of potential objectives:

1. The proposed objectives
2. The current most relevant objectives - the status quo.

**Proposed objectives CCZ-02, CCZ-03, CCZ-06 and WFZ-04:**

City Centre Zone:

**CCZ-02 Accommodating Growth**

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

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

**CCZ-03 Urban form and scale**

The scale and form of development in the City Centre Zone reflects its purpose as Wellington's primary commercial and employment centre, with the highest and most intensive form of development concentrated in the zone relative to other parts of the city.

**CCZ-06 Development near rapid transit**

Activities and development near existing and planned rapid transit stops:

1. Are located to enable convenient access by local residents, workers and visitors, particularly around transport hubs;
2. Are of sufficient residential scale and intensity to support a frequent and rapid transit network and associated mixed use development; and
3. Provide vibrant, attractive and easily accessible public space.

Special Purpose Waterfront Zone:

**WFZ-04 Areas of change**

Areas of change are redeveloped over time into high-quality public spaces and buildings.

**General intent:**

- To articulate what level and form of development is anticipated within the CCZ to accommodate future growth and meet development capacity.
- To articulate what urban form and scale is anticipated within the CCZ and WFZ to reflect the zones roles and purposes.
- To articulate what outputs are expected to accompany new development in the CCZ, including for development near rapid transit.
- To promote the development of high quality public spaces and buildings in the WFZ for identified areas of change.

**Other potential objectives**

Status quo - three directly relevant objectives in the ODP:

- 12.2.1 – Containment and Accessibility - To enhance the Central Area's natural containment, accessibility, and highly urbanised environment by promoting the efficient use and development of natural and physical resources.



<ul style="list-style-type: none"> <li>• 12.2.4 – Sensitive Development Areas - To ensure that any future development of large land holdings within the Central Area is undertaken in a manner that is compatible with, and enhances the contained urban form of the Central Area.</li> <li>• 12.2.8 – Lambton Harbour Area- To ensure that the development of the Lambton Harbour Area, and its connections with the remainder of the city's Central Area, maintains and enhances the unique and special components and elements that make up the waterfront.</li> </ul>		
	Preferred objective	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	<p>The preferred objectives directly address five clear issues:</p> <ul style="list-style-type: none"> <li>• Accommodating redevelopment of the remaining areas of change on the waterfront in a manner that enables high-quality development outcomes and are sympathetic with the surrounding environment;</li> <li>• Availability of adequate development capacity in the CCZ to accommodate projected residential demand whilst also offering a range of housing choice;</li> <li>• Inefficient/non-strategic use of available CCZ development capacity, particularly on large, narrow and/or vacant development sites;</li> <li>• Anticipating and accommodating projected growth demand for development near locations where mass transit investment has been signaled in the CCZ; and</li> <li>• Managing the tension between ongoing commercial activation of street edges within the CCZ, particularly along key pedestrian routes, and providing opportunities at street level to accommodate projected residential growth.</li> </ul>	<p>The current objectives are generic in nature and seek to manage the Central Area as a 'physical resource' and address broader Part 2 obligations.</p> <p>For the CCZ, the objectives touch on the issues of enhancing the Central Area's highly urbanised environment by promoting the efficient development of physical resources and ensuring development of large land holdings is compatible with the existing contained form. For the WFZ, the objectives seek to ensure development maintains and enhances the waterfront's special components.</p> <p>However, unlike the preferred objectives there is a lack of clarity and direction concerning the outcomes sought.</p>
Assists the Council to undertake its functions under s31 RMA	The proposed objectives will assist the Council to undertake its functions under s31 of the RMA, particularly s31 (a) and (aa), the integrated management of resources through controlling any actual or potential effects of the use and development of land in the CCZ and WFZ, and ensuring there is sufficient development capacity in	Although the objectives provide some direction to assist Council to undertake its integrated management function under s31 (a) of the RMA, they lack sufficient clarity for Council to meet its responsibilities under s31 (aa), namely providing for sufficient development capacity and efficient and strategic utilisation of CCZ and WFZ land.

	respect of housing and business land to meet the expected demand in the CCZ.	
Gives effect to higher level documents	The proposed objectives give effect to higher level documents, particularly policies 1,2,3 and 4 of the NPSUD, policy 6 of the NZCPS and objectives 22 and related policies 30, 31, 54, and 57 RPS. They are also consistent with s7(b) of the RMA, reflect relevant directions in the National Planning Standards, align with the Compact and Vibrant and Prosperous goals and related directions in the Our City Tomorrow: A Spatial Plan for Wellington City, and respond to the projected housing demand identified in the Wellington Housing and Business Development Capacity Assessment.	Although the objectives give effect to the RPS and NZCPS they give insufficient effect to the NPS-UD and are less well aligned with relevant directions in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City.
<i>Usefulness:</i>		
Guides decision-making	<p>In conjunction with the proposed policies the proposed objectives will effectively guide decisions on resource consent applications as they provide clear direction regarding anticipated growth, levels of development and urban form and scale anticipated in the CCZ and WFZ.</p> <p>These are further supported by accompanying building rules that support the growth, development and urban form that is compatible with the purpose and role of the zones. These objectives also align with the PDP's strategic direction objectives.</p>	In conjunction with the policies the objectives in the ODP provide a reasonable degree of direction to guide decisions on resource consent applications. However, they provide less clarity and direction in relation to achieving adequate development capacity in CCZ, enabling a range of housing choice, strategic use of CCZ sites, and increasing opportunities for residential growth. The objectives are also silent regarding redevelopment of areas of change on the waterfront and do not directly align with the strategic direction objectives in the PDP.
Meets best practice for objectives	The objectives are specific and state the level, scale and form of development and growth that is to be achieved. They are framed as clear outcome statements, consistent with best practice and the intent underlying the National Planning Standards. They also respond to national legislative requirements including the NPS-UD's requirement to maximise development capacity and enhance development capacity.	<p>Unlike the preferred objectives the status quo objectives are more generic in nature and lack specificity concerning the outcomes sought.</p> <p>Although similar provisions were common in a number of 'first generation' district plans, these have generally been replaced in subsequent plan reviews or specific plan changes with clearer and more instructive provisions. They also fail to address the</p>

		directives under the NPS-UD to accommodate growth and increase development capacity.
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	These objectives do represent a reasonably significant shift from the current direction in the ODP. However, it is unlikely that these objectives will impose unjustifiably high costs on property owners and developers to achieve the outcomes sought.	The existing objectives do not appear to have resulted in significant compliance costs being incurred by landowners/developers.
Acceptable level of uncertainty and risk	There is a high level of certainty around the proposal and its effects as the proposed objectives provide greater clarity of intent regarding the outcomes sought in the CCZ and WFZ. Whilst the objectives depart from the current direction, they are specific, state what is to be achieved and are founded on a comprehensive information/evidence base.	There is a lesser degree of certainty around the existing objectives given their generic nature and lack of clear direction regarding the outcomes anticipated.  The objectives are founded on a dated information/evidence base and are misaligned with the NPS-UD and the directional intent in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City direction, thereby increasing the level of uncertainty and risk associated with their retention.
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	The proposed objectives have been reviewed by tangata whenua, with no further need for additional tangata whenua specific outcomes identified. The intent to support well-functioning urban centres reflects the aspirations of the general public and stakeholders.	The intent to support well-functioning urban centres reflects the aspirations of the general public and stakeholders and tangata whenua.
Realistically able to be achieved within the Council's powers, skills and resources	The objectives are realistically able to be achieved within the Council's powers, skills and resources, with any additional skills or resources required able to be sourced either in-house or on a contract basis.	The status quo objectives are currently being implemented within the Council's powers, skills and resources.
<b>Summary</b>		
Proposed Objectives CCZ-02, CCZ-03, CCZ-06 and WFZ-04 provide clear direction regarding accommodating growth, efficient utilisation of land and urban and form anticipated within the CCZ and WFZ. They also set out the Council's expectations concerning the form and scale of development and change within the zones consistent with their roles and intended purpose.		

The above analysis indicates that the preferred objectives are the most appropriate way to achieve the purpose of the Act and the Council's functions under s31 RMA, give the greatest effect to the higher-level planning instruments, particularly the NPS-UD, align with the directional intent of the National Planning Standards and provide greater certainty for decision-makers and Plan users. They are also unlikely to result in significant additional administrative or compliance costs being incurred.

#### **10.5 Evaluation of Objectives CCZ-05, WFZ-03, STADZ-02, CCZ-07, WFZ-07 and STADZ-04 (density done well – providing for amenity and managing effects)**

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objectives are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two sets of potential objectives:

1. The proposed objectives
2. The current most relevant objectives - the status quo.

<b>Proposed objectives CCZ-05, WFZ-03, STADZ-02, CCZ-07, WFZ-07 and STADZ-04:</b>		
Six objectives that seek that development in the CCZ, WFZ, STADZ and Te Ngākau contributes to creating a high quality, well-functioning urban environment, contributes to the zone or precinct's identity and sense of place, provides a quality and level of public and private amenity, maintains and enhances the safety and amenity of public space, provides for resilient urban environments that respond to natural hazards and climate change effects and acknowledge and sensitively respond to adjoining residential and open space zoned land, heritage buildings, areas, character areas and sites of significance to Māori.		
<b>General intent:</b>		
<ul style="list-style-type: none"> <li>• To highlight the anticipated amenity values of the CCZ, WFZ, STADZ and associated Te Ngākau Precinct.</li> <li>• To articulate what is anticipated within the CCZ, WFZ, STADZ and associated Te Ngākau Precinct regarding the management of adverse effects.</li> <li>• To provide for resilient urban environments that respond to natural hazards and climate change effects within the CCZ, WFZ, STADZ and associated Te Ngākau Precinct</li> </ul>		
<b>Other potential objectives</b>		
<p>Status quo - five directly relevant objectives in the ODP:</p> <ul style="list-style-type: none"> <li>• 12.2.2 – Activities - To facilitate a vibrant, dynamic Central Area by enabling a wide range of activities to occur, provided that adverse effects are avoided, remedied or mitigated.</li> <li>• 12.2.5 – Effects of New Building Works - Encourage the development of new buildings within the Central Area provided that any potential adverse effects can be avoided, remedied or mitigated.</li> <li>• 12.2.6 – Buildings and Public Amenity - To ensure that new building works maintain and enhance the amenity and safety of the public environment in the Central Area, and the general amenity of any nearby Residential Areas.</li> <li>• 12.2.7 Building Amenity To promote energy efficiency and environmental sustainability in new building design.</li> <li>• 12.2.13 – Natural and Technological Hazards -To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.</li> </ul>		
	<b>Preferred objective</b>	<b>Status quo</b>
<b>Relevance:</b>		
Addresses a relevant resource management issue	<p>The preferred objectives directly address eight clear issues:</p> <ul style="list-style-type: none"> <li>• Identifying the amenity values associated with CCZ, STADZ, WFZ and Te Ngākau areas that need to be maintained or enhanced.</li> </ul>	<p>The ODP objectives specify outcomes to be achieved within the scope of s7 amenity value and environmental quality considerations as well as broader obligations. Whilst the objectives speak to amenity and managing potential adverse effects, they are generic in nature</p>

	<ul style="list-style-type: none"> <li>• Adequacy of the level of amenity (e.g. outlook, daylight, usability, storage) provided in the CCZ and WFZ, particularly for inner-city residents in light of projected residential growth.</li> <li>• Variable standards and quality of building design/works and public space provision compromise the CCZ's roles and functions and diminish the existing and evolving character of the area and the quality of the urban environment.</li> <li>• Managing the tension between retaining/enhancing existing CCZ, WFZ and Te Ngākau character and enabling greater design ingenuity/creativity.</li> <li>• Managing the effects of CCZ activities and building heights anticipated by the NPS-UD along boundary interfaces with residentially zoned properties.</li> <li>• Adequacy and quality of amenity offered by public open space in the CCZ and WFZ. Particularly in light of the increased levels of intensification anticipated by the NPS-UD for CCZ (e.g. shading).</li> <li>• Providing adequate accessible, attractive, safe and comfortable public open space in the CCZ and WFZ, including retention of existing spaces, to offset the increased levels of intensification anticipated by the NPS-UD in the CCZ.</li> <li>• Vulnerability of CCZ, WFZ and Te Ngākau areas to the effects of climate change, particularly sea level rise, and natural hazards such as earthquakes, and the need for strengthening and adaptive reuse of buildings identified as a seismic risk.</li> </ul>	<p>and lack clarity and direction regarding the specific outcomes sought.</p>
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Assists the Council to undertake its functions under s31 RMA	The proposed objectives will assist the Council to undertake its functions under s31 of the RMA, particularly the control of any actual or potential effects of the use, development and protection of land in regards to section s31(b),s31(b)(i) and s31(b)(iia).	Although more generic in nature the ODP objectives reasonably articulate and encapsulate the Council's s31(b) responsibilities. However, unlike the preferred objectives they lack clarity regarding amenity, adverse effects and natural hazard outcomes anticipated within the CCZ, WFZ and Te Ngākau precinct.
Gives effect to higher level documents	The proposed objectives give effect to higher level documents, particularly policies 1, 4, 6 and 10 of the NPSUD, policy 6 of the NZCPS and objectives 4, 6, 7, 8, 15, 19 – 22, 23-26 and 28 and associated policies 20, 21, 29, 30, 31, 33, 35, 36, 46, 51, 52, 54, 55, and 57 of the RPS. They are also consistent with the purpose and principles of the RMA, particularly s6(a), (d) – (f) and (h) and s7(c), (f) and (i), reflect the relevant directions in the National Planning Standards, align with the Mana Whenua Partnership, Inclusive and Connected, Greener and Vibrant and Prosperous goals and related directions in the Our City Tomorrow: A Spatial Plan for Wellington City, Central City Spatial Vision and the Green Network Plan.	Although the objectives give effect to the RPS and NZCPS they are less well aligned with relevant directions in the NPS-UD, National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City, as well as relevant Council plans including the Central City Spatial Vision and Green Network Plan.
<i>Usefulness:</i>		
Guides decision-making	<p>In conjunction with the proposed policies the proposed objectives will effectively guide decisions on resource consent applications as they provide clear direction regarding the design and amenity outcomes anticipated within the CCZ, WFZ, STADZ and Te Ngākau precinct.</p> <p>These are further supported by accompanying rules that clearly delineate those activities identified as compatible/incompatible with the amenity values and anticipated design quality of these areas.</p>	In conjunction with the policies the objectives in the ODP provide a reasonable degree of direction to guide decisions on resource consent applications. However, they provide less clarity and direction regarding the amenity outcomes anticipated within the CCZ, WFZ, STADZ and Te Ngākau precinct. In particular, amenity considerations are generalised and not specific to individual zones or areas. Additionally, matters over which the objectives are attempting to avoid the adverse impacts of development are neither identified nor spatially specific, for example residential zone interfaces or open space zoned land.



Meets best practice for objectives	Identifying the amenity values of the CCZ, WFZ, STADZ and Te Ngākau precinct, encouraging high quality and resilient development and managing adverse effects aligns with current best practice, and the well-functioning urban environment intentions of the NPS-UD.	<p>Unlike the preferred objectives the status quo objectives are more generic in nature and lack specificity concerning the outcomes sought.</p> <p>Although similar provisions were common in a number of 'first generation' district plans, these have generally been replaced in subsequent plan reviews or specific plan changes with clearer and more instructive provisions. They also fail to align with the directive under the NPS-UD to enable well-functioning urban environments.</p>
<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	<p>As the proposed objectives do not generally represent a radical departure from the current direction in the ODP it is unlikely that they will impose unjustifiably high costs on property owners and developers to achieve the outcomes sought.</p> <p>However, a distinct point of difference with the ODP objectives is specific reference to residential amenity outcomes in addition to those relating to adjacent zones and the public more generally.</p> <p>Development feasibility analysis undertaken by The Property Group in their report<sup>2</sup> demonstrates that in most cases where the amenity provisions have been applied the development remains profitable. It does note that there are feasibility impacts by including amenity controls. However, the report identifies that the feasibility impacts are also present when the new controls have not been applied, are reflective of the challenges facing the construction sector currently.</p>	The existing objectives do not appear to have resulted in significant compliance costs being incurred by landowners/developers.

<sup>2 2</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report

<p>Acceptable level of uncertainty and risk</p>	<p>There is a high level of certainty around the proposal and its effects as the proposed objectives provide greater clarity of intent regarding the outcomes sought in the CCZ, WFZ, STADZ and Te Ngākau precinct. Whilst there is some departure from the current direction, they are also specific, state what is to be achieved and are founded on a comprehensive information/evidence base.</p>	<p>There is a lesser degree of certainty around the existing objectives given their generic nature and lack of clear direction regarding the outcomes anticipated.</p> <p>The objectives are founded on a dated information/evidence base and are misaligned with the NPS-UD and directional intent in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City, thereby increasing the level of uncertainty and risk associated with their retention.</p>
<p><b>Achievability:</b></p>		
<p>Consistent with identified tangata whenua and community outcomes</p>	<p>The overall focus on enhancing the design and amenity outcomes of these zones and associated Te Ngākau precinct, and maintaining the amenity of areas adjacent to these zones, reflects the aspirations of the general public, stakeholders, and tangata whenua.</p> <p>The objectives were developed with tangata whenua to ensure adverse effects of activities and development that interfaces with sites and areas of significance to Māori are managed effectively.</p> <p>They also reflect community outcomes by ensuring development positively contributes to providing a quality and level of public and private amenity, managing sunlight access to public spaces and managing adverse effects at interfaces with heritage and character areas.</p>	<p>The generic focus on maintaining and enhancing amenity in the CCZ, WFZ, STADZ, Te Ngākau precinct and adjacent areas, and avoiding, remedying or mitigating development related effects, reflects the aspirations of the general public, stakeholders, tangata whenua.</p>
<p>Realistically able to be achieved within the Council's powers, skills and resources</p>	<p>The objectives are realistically able to be achieved within the Council's powers, skills and resources, with any additional skills or resources required able to be sourced either in-house or on a contract basis.</p>	<p>The status quo objectives are currently being implemented within the Council's powers, skills and resources.</p>
<p><b>Summary</b></p>		

Proposed Objectives CCZ-05, WFZ-03, STADZ-02, CCZ-07, WFZ-07 and STADZ-04 provide clear direction regarding amenity values anticipated within the CCZ, WFZ, STADZ and Te Ngākau precinct. They also set out the Council's expectations concerning quality design outcomes, managing adverse effects within these zones and at zone interfaces, and encouraging greater seismic and climate change resilience.

The above analysis indicates that the preferred objectives are the most appropriate way to achieve the purpose of the Act and the Council's functions under s31 RMA, give the greatest effect to the higher-level planning instruments, align with the directional intent of the National Planning Standards and provide greater certainty for decision-makers and Plan users. They are also unlikely to result in significant additional administrative or compliance costs being incurred.

## 11.0 Evaluation of Reasonably Practicable Options and Associated Provisions

### 11.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective(s).

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering and analysis undertaken in relation to this topic reasonably practicable alternative options to achieve the objectives.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

### 11.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objectives.

Where practicable, benefits and costs have been quantified. Additionally, any obvious opportunities for economic growth and employment arising from the proposed provisions have also been identified and assessed.

This evaluation is contained in sections 11.3, 11.4 and 11.5 below, noting that the provisions evaluated in each of these sections correspond with their aggregated objective counterparts in sections 10.2, 10.3 and 10.4 of this report as follows:

1. Section 11.3 contains an evaluation of the relevant options against proposed objectives centred on general matters relating to the CCZ, WFZ, STADZ and Te Ngākau, namely the purpose of each of these areas, associated activities, mana whenua partnership and connections;
2. Section 11.4 contains an evaluation of the relevant options against proposed objectives relating to anticipated growth and intensification. However, it is important to note that:
  - Te Ngākau does not have specific objectives that relate to anticipated growth and intensification, however these objectives within the CCZ apply to Te Ngākau as the precinct is located within in and is subject to CCZ zoning. Te Ngākau provisions prevail over the CCZ provisions where there is a clash, and also refine the outcomes sought. This instance is an example of this where redevelopment is anticipated (as per the Te Ngākau Precinct Framework) but to a lesser extent of growth and intensification than in the CCZ.
  - The STADZ does not have any specific objectives relating to accommodating growth or intensification, its objectives instead focus on the zone's purpose, amenity and design, Fran Wilde Walkway and managing effects; and
3. Section 11.5 contains an evaluation of the relevant options against proposed objectives relating to density done well, specifically amenity, adverse effects management and resilience CCZ, WFZ, STADZ and Te Ngākau.

**11.3 Provisions to achieve Objectives CCZ-01, CCZ-PREC-01, WFZ-01, WFZ-06, STADZ-01, CCZ-04, WFZ-02, WFZ-05, CCZ-PREC-03 and STADZ-03 (general objectives)**

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo.

**Proposed Objectives CCZ-01, CCZ-PREC-01, WFZ-01, WFZ-06, STADZ-01, CCZ-04, WFZ-02, WFZ-05, CCZ-PREC-03 and STADZ-03**

Ten objectives that address the purpose of each zone and precinct, appropriate activities within the zones, the acknowledgement of Taranaki Whānui and Ngāti Toa Rangatira as the mana whenua and the need to provide for active transport and micro-mobility connections between different zones and precincts.

Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><b>Policies:</b></p> <p>Eighteen policies (CCZ-P1-P3, CCZ-P7-P8, CCZ-PREC-P1, CCZ-PREC-P3-P4, WFZ-P1-P5, WFZ-P10, STADZ P1-4 and STADZ-P6) relating to the CCZ and associated Te Ngākau precinct, WFZ and STADZ that seek to:</p> <ul style="list-style-type: none"> <li>• Provide clear direction as to the range of activities that are compatible/incompatible with the purpose role, vibrancy and amenity of the zones and associated precinct.</li> <li>• Avoid heavy industrial activities.</li> <li>• Recognise and enable Taranaki Whānui and Ngāti Toa Rangatira’s cultural associations, landowner and developer interests.</li> <li>• Ensure that activities and development contribute to identity and sense of place.</li> <li>• Protect and maintain the Waterfront’s public open spaces.</li> <li>• Maintain and enhance active transport and micro-mobility connections between the edge of Te Whanganui-a-Tara, public transport, the CCZ, STADZ, WFZ and Te Ngākau precinct, including the Fran Wilde Walkway.</li> <li>• Ensure that STADZ development recognises and has regard to the area’s cultural and historical significance.</li> </ul> <p><b>Rules:</b></p> <p>A framework of land use rules that:</p> <ul style="list-style-type: none"> <li>• Permit key activities anticipated in the zones and precinct subject to meeting specified conditions, including residential activity at ground floor level in the CCZ subject to specified conditions.</li> <li>• Discourage carparking activities at ground level through a discretionary status.</li> <li>• Provide for other potentially compatible activities as a restricted discretionary or discretionary activity.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• The provisions allow for a wider range of permitted activities which, depending on the level of intensification that occurs over the life of the PDP, may result in a change in the level of amenity experienced within the CCZ, WFZ, STADZ and Te Ngākau precinct.</li> <li>• Adequacy of the rules/standards to anticipate and effectively manage the effects of the full range of activities enabled.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Administrative and compliance costs associated with activities that do not meet the relevant effects standards, including proposed requirements relating to minimum building height, ground level carparking and creation of vacant land.</li> <li>• Short term costs to plan users and Council consenting teams while building familiarity with the new provisions.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Increased exposure to potential risk of reverse sensitivity effects given the rise in residential activity anticipated in the CCZ (e.g. areas where ground floor residential activity is proposed to be permitted).</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• No direct or indirect costs have been identified. Although there are sites and areas of significance to Māori and statutory acknowledgement areas within the CCZ and WFZ, Council has been working in partnership to develop these Zone provisions, especially the Ahi Kā provisions, and the policy framework seeks to manage adverse effects on sites and areas of significance to Māori.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Aligns with the purpose and principles of the RMA, particularly ss6(a), (d) and (e) and ss7(a), (b), (c) and (f).</li> <li>• Reflects with the zoning framework specified in the National Planning Standards, including application of special purpose zones to the stadium and waterfront areas and a precinct approach to the Te Ngākau area.</li> <li>• Inclusion of the waterfront and stadium areas as stand-alone zones recognises their distinctiveness relative to the wider city centre and the important contribution they make to the city and region.</li> <li>• Gives effect to relevant policy directives in the NPS-UD and NZCPS.</li> <li>• Gives heightened effect to the policy intent articulated in policies 30,48,49, 66, 31 and 57 of the RPS through: <ul style="list-style-type: none"> <li>○ Clearly aligning with and reflecting the urban growth direction set out in Our City Tomorrow: A Spatial Plan for Wellington City</li> <li>○ Maintaining and enhancing the viability and vibrancy of a regionally significant centre</li> <li>○ Giving effect to the principles of the Treaty of Waitangi</li> <li>○ Recognising and providing for matters of significance to tangata whenua</li> <li>○ Enhancing involvement of tangata whenua in resource management decision-making</li> </ul> </li> <li>• Aligns with the Compact, Mana Whenua Partnership, Vibrant and Prosperous, Inclusive and Connected goals and related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>• Aligns with the PDP’s Strategic Direction objectives outlined in section 3 of this report.</li> <li>• Specifically aligns with and responds to the proposed objectives, including the purpose of the CCZ, WFZ, STADZ and the Te Ngākau precinct.</li> <li>• Provides greater strategic recognition than currently provided in the ODP of these areas through chapter introduction, policy framework and stand-alone zone application, that aligns with the National Planning Standards.</li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> <li>• Whilst there was an array of feedback on the Draft District Plan (see Appendix 1), feedback generally supported the proposed approach for the CCZ, WFZ and STADZ.</li> <li>• The PDP provisions align with direction in the Our City Tomorrow: A Spatial Plan for Wellington City which has been widely engaged upon with the public, stakeholders and tangata whenua.</li> <li>• The evidence base for acting is comprehensive. There is also clear national direction that necessitates change, and many of the changes required for CCZ, WFZ, STADZ and Te Ngākau are mandated through the National Planning Standards and the NPS-UD.</li> <li>• Overall, the risk of not acting is considered to be greater than the risk of acting.</li> </ul>

- Permit the repair, maintenance, demolition or removal of a building or structure.
- Zoning Spatial Layer:**
- Application of CCZ to bulk of the ODP Central Area to manage land use activities, development, amenity and adverse effects in the City Centre.
  - Extension of the CCZ to include Adelaide Road (from Rugby Street to Riddiford Street) to provide for a mix of activities, greater intensification and to support LGWM MRT development uplift.
  - Extension of the CCZ to include Selwyn Terrace and Portland Crescent, as these areas currently have a mix of land uses, to support a mixture of activities and growth in these areas.
  - Application of the STADZ to Wellington Regional Stadium and Fran Wilde Walkway. The application of STADZ to the walkway will support consistency in decision making with a singular zone approach.
  - Application of WFZ to the Waterfront (ODP Lambton Harbour Area) to support a mixture of activities, protecting existing heritage and effective redevelopment of remaining areas of change whilst minimising adverse effects.
  - The ODP Central Area zoned Pipitea Precinct has been removed and the Port Redevelopment Precinct has been replaced with the Inner Harbour Port Precinct, with these areas, plus the commercial port, being rezoned under the PDP to Port Zone.
- Precinct Spatial Layer:**
- Application of a precinct approach to managing land use activities, redevelopment, amenity and heritage values in the Te Ngākau Civic Square.
- Other Methods:**
- The Centres and Mixed Use and Residential Design guides are relevant with respect to provisions relating to access, connectivity and the effects of activities, development and buildings.
  - Two methods within the WFZ:
    - Mana Whenua involvement in managing the WFZ, including supplying a record of engagement with Mana Whenua with any application for resource consent or private plan change request and enabling Mana Whenua to select up to half of the hearing panel commissioners where a public hearing is required.

- Provides a clearer policy framework to enable compatible land use activities to locate and operate in the CCZ, WFZ, STADZ and Te Ngākau area with certainty, and for Council to determine the appropriateness of less compatible activities and whether it has the potential to undermine the intent of the zone.
- Provisions provide for a range of land use activities within the CCZ, WFZ, STADZ and Te Ngākau, which maintain and enhance vitality and vibrancy in these spaces.
- Provision for increased residential activity within the CCZ and Te Ngākau precinct satisfies relevant policy directives in the NPS-UD and will also enhance the level of activation experienced in these areas.
- In relation to land use, the proposed approach is similar to the ODP, whereby appropriate activities are provided for and other activities are managed through a resource consent process. This supports the needs of local communities and contributes to achieving well-functioning urban environments.

**Economic**

- Provides clarity and certainty concerning the range of compatible activities permitted within the CCZ, WFZ, STADZ and Te Ngākau precinct.
- Potential reduction in administrative and compliance costs as there is a wide range of activities enabled across the zones, greater clarity concerning the range of permitted activities and most areas of non-compliance are proposed to be treated as a restricted vs full discretionary activity.
- Permits a wide range of compatible activities, thereby creating opportunities for increased economic growth and employment related benefits to be realised.
- Helps to maintain and enhance the primacy of the CCZ as the main commercial and employment centre and its place within the Centres hierarchy.
- With a stand-alone zone, policy and rule framework Wellington Regional Stadium can operate efficiently and effectively as a multi-purpose facility, continuing to contribute to the economic, social, and cultural wellbeing of the local and regional community.

**Social**

- The CCZ, WFZ, STADZ and Te Ngākau precinct continue to provide for the social needs and wellbeing of existing communities and future residents, including the protection of public open space along the waterfront.

<ul style="list-style-type: none"> <li>○ Integrated management across the mean high water springs, with WCC working with Mana Whenua, GWRC and other agencies on integrated management of resources.</li> </ul>		<ul style="list-style-type: none"> <li>• General retention of the current direction and intent of provisions to manage the waterfront and stadium offers a level of familiarity and consistency regarding the likely development outcomes anticipated in these areas.</li> <li>• Simple and clear plan structure that provides increased certainty and will be easier for people to understand and apply.</li> <li>• Provisions allow for healthcare, educational and community facilities, and arts, culture and entertainment activities thereby improving accessibility of these activities for local communities.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Specific Ahi Kā mana whenua objectives and policies within the CCZ, WFZ and the STADZ developed in partnership with mana whenua that recognise their cultural associations and developer and landowner interests.</li> <li>• Specific recognition of the cultural and historic values associated with the Te Ngākau/Civic Square and Stadium through incorporation into a distinct precinct, including associated targeted provisions.</li> </ul>	
<p><b><u>Effectiveness and efficiency</u></b></p>	<p><b><i>Effectiveness</i></b></p> <p>It is considered that the provisions will effectively achieve the proposed objectives because:</p> <ul style="list-style-type: none"> <li>• They provide a clear and integrated framework to achieve the intended purpose of the CCZ, WFZ, STADZ and Te Ngākau precinct and the related outcomes sought.</li> <li>• They are based on sound evidence, and have been developed through an extensive consultation process.</li> <li>• They create increased opportunities for residential activity within the CCZ and Te Ngākau precinct alongside provisions to achieve quality living environments and well-functioning urban environments.</li> <li>• They maintain the Centres hierarchy and the primacy of the CCZ.</li> <li>• They enable a mixture of activities to enhance the vibrancy and vitality of the zones and precinct.</li> <li>• They effectively implement the higher order directions in the NPS-UD and the National Planning Standards.</li> </ul>	<p><b><i>Efficiency</i></b></p> <p>It is considered that the proposed approach is the most efficient means of achieving the relevant objectives. The approach is efficient in terms of the level of certainty provided to landowners, mana whenua and plan users generally. It is also efficient from the point of view of enabling a broad range of activities as of right, supplemented by land use consent where baseline effects standards are exceeded.</p> <p>Overall, the costs are considered negligible relative to the benefits derived from the proposal.</p>	
<p><b><u>Overall evaluation</u></b></p>	<p>Overall, this approach is the most appropriate means of achieving the proposed objectives as it provides an appropriate balance between enabling opportunities for growth and development to occur in the CCZ, WFZ, STADZ and Te Ngākau precinct while achieving a quality, well-functioning urban living environment and safeguarding distinct elements that contribute to their identity and sense of place. It also allows the Wellington Regional Stadium to operate efficiently and effectively, enables the Te Ngākau precinct to be redeveloped whilst respecting its civic purpose and associated cultural and heritage values and provides for buildings to incorporate natural hazard and climate change resilience. Additionally, it satisfies relevant policy directives in the NPS-UD and RPS and reflects relevant directions in the National Planning Standards.</p>		



	The benefits of the approach outweigh the costs, there are considerable efficiencies to be gained from adopting the proposed provisions and there is sufficient information on which to act.		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><b><u>Policies:</u></b></p> <p>36 policies broadly (or more specifically) speak to the topics of purpose, activities, and access. These policies cover a wide array of matters including:</p> <ul style="list-style-type: none"> <li>• Encourage a wide range of activities.</li> <li>• Taking into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi.</li> <li>• Enable a wide range of activities that relate to the needs and wishes of tangata whenua and other Māori.</li> <li>• Protecting and enhancing access to public spaces.</li> <li>• Improve access for all people.</li> <li>• Maintaining access along and to the Coastal Environment.</li> <li>• Providing for special entertainment events in the stadium.</li> <li>• Ensuring adverse environmental effects are avoided, remedied or mitigated.</li> <li>• Facilitating public involvement in the waterfront planning process.</li> </ul> <p><b><u>Rules:</u></b></p> <p>Rules that provide for activities compatible with the zones' purpose as permitted activities with defaults to either Restricted Discretionary or Discretionary Activity status.</p> <p>The range of relevant rules and standards that apply in the CCZ, STADZ, WFZ and Te Ngākau are set out in Section 5 of this report.</p> <p><b><u>Other Methods:</u></b></p> <p>The Central Area design guide.</p>	<p><b><i>Environmental</i></b></p> <ul style="list-style-type: none"> <li>• Misaligns with the zoning framework specified in the National Planning Standards.</li> <li>• Conflicts with the NPS-UD directive that the Council, as a tier 1 local authority, needs to provide for well-functioning urban environments that have sufficient development capacity to meet the different needs of its people and communities.</li> <li>• Contrary to the urban growth direction set out in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>• Less effectively and deliberately responds and supports the outcomes sought in the proposed objectives.</li> <li>• Less clear and directive policy framework within which to consider the effects of activities on the role, scale, amenity and character anticipated within the CCZ, WFZ, STADZ and Te Ngākau precinct.</li> <li>• Inadequately recognises and distinguishes the differing roles and characteristics of the city centre, waterfront, stadium and Te Ngākau/civic centre within the broader context of the central area.</li> <li>• Built form standards do not necessarily reflect the anticipated role, scale, amenity and character anticipated within these zones and the intensification outcomes sought by the NPS-UD.</li> <li>• Adequacy of the rules/standards to anticipate and effectively manage the effects of the full range of activities enabled across the CCZ, WFZ, STADZ and Te Ngākau precinct.</li> <li>• Maintaining the current approach would not address housing needs and is likely to exacerbate housing affordability issues.</li> <li>• Existing issues identified with the ODP provisions would not be addressed and may be exacerbated.</li> </ul> <p><b><i>Economic</i></b></p> <ul style="list-style-type: none"> <li>• Administrative and compliance costs associated with activities/development that do not meet the relevant effects standards.</li> </ul>	<p><b><i>Environmental</i></b></p> <ul style="list-style-type: none"> <li>• Although less directive than the proposed approach it broadly aligns with the purpose and principles of the RMA, particularly ss6(a), (d) and (e) and ss7(a), (b), (c) and (f).</li> <li>• Aligns with the Compact, Vibrant and Prosperous, Inclusive and Connected goals and related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</li> </ul> <p><b><i>Economic</i></b></p> <ul style="list-style-type: none"> <li>• Relatively cost effective to implement as limited drafting required and landowners, developers and the community are already familiar with the provisions.</li> </ul> <p><b><i>Social</i></b></p> <ul style="list-style-type: none"> <li>• Continuation of the existing approach provides familiarity along with a level of certainty to the community as to the likely development outcomes anticipated.</li> </ul> <p><b><i>Cultural</i></b></p> <ul style="list-style-type: none"> <li>• No direct or indirect benefits have been identified.</li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as the existing provisions and associated implications/issues are well documented and understood.</p> <p>A key risk of acting on the status quo provisions is that the current policy framework lacks detail and clear direction on the purpose of the different areas, amenity values attributable to the different areas with the zone and associated Te Ngākau precinct and matters to inform the determination of compatible/incompatible activities and development within the zones.</p>

	<ul style="list-style-type: none"> <li>Unlikely to be responsive or flexible enough to accommodate anticipated growth pressures in the city and to satisfy NPS-UD policy directives.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Potential for reverse sensitivity effects.</li> <li>More difficult to understand and apply given the relatively complex and less integrative structure and construction of provisions.</li> <li>Built form standards may unduly restrict some types or scale of buildings and structures, which could limit the ability to meet anticipated housing demand.</li> <li>Although offering a degree of familiarity the provisions are dated and inconsistent with the high order direction.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect costs have been identified.</li> </ul>		
<b><u>Effectiveness and efficiency</u></b>	<p><b>Effectiveness</b></p> <p>The status quo is not considered to be an effective method of achieving the intent of the proposed objectives as it will not, relative to the proposed approach, enable the uplift in development density and/or residential activity in the CCZ needed to meet anticipated growth demand and higher order policy direction or provide for the necessary redevelopment of Te Ngākau, the comprehensive mix of activities for the STADZ nor the relationship and partnership with mana whenua in the CCZ and WFZ.</p> <p>The current policy framework has limited effectiveness as it is somewhat ambiguous and lacks clear direction. Consequently, it is open to interpretation and could inadvertently compromise the outcomes sought by the proposed objectives.</p>	<p><b>Efficiency</b></p> <p>The status quo presents some efficiencies in the sense that it is familiar to regular plan users, however, its relatively complex and less integrative structure and construction can present challenges to new or casual users and it addresses a number of matters best dealt with in district-wide chapters.</p> <p>Overall it is considered that the status quo, relative to the proposed provisions, is not an efficient method of meeting the proposed objectives given the relative costs versus benefits outlined above.</p>	
<b><u>Overall evaluation</u></b>	<p>This approach is not an appropriate means to achieve the proposed objectives as the current policies are somewhat ambiguous regarding the purpose of the CCZ, WFZ, STADZ and Te Ngākau precinct and factors to help inform what constitutes compatible/incompatible activities and development within the zones and precinct. Consequently, they lend themselves to more open interpretation and are less likely, relative to the proposed provisions, to constructively assist the Council in determining the appropriateness of activities or development that could undermine the intent of the zones and precinct. The approach would also be less effective in delivering on relevant NPS-UD and National Planning Standards directives and objective and policies in the RPS.</p>		

#### 11.4 Provisions to achieve Objectives CCZ-02, CCZ-03, CCZ-06 and WFZ-04 (providing for anticipated growth and intensification)

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions applying to CCZ and WFZ (and Te Ngākau through CCZ Zoning, see Te Ngākau comment in Section 11.2). The Stadium Zone does not have specific objectives relating to accommodating growth and intensification as outlined in section 11.2
2. The status quo
3. A more permissive approach to addressing the need to maximise development capacity, provide for anticipated growth and intensification and more efficiently utilise land within the CCZ and WFZ, including a less stringent regulatory approach to design, amenity and adverse effects matters. This involves:

In the CCZ:

- DDP CCZ comprehensive development rule to enable amalgamation of land in CCZ
- No adjoining site specific building height control limits (i.e., no PDP CCZ-S2 and CCZ-S3).

In the WFZ:

- Making development in the WFZ a Restricted Discretionary Activity (RDA) with use of an RDA default setting for activities not compliant with relevant standards (akin to CCZ proposed approach)
- Removing PDP WFZ site coverage standard (WFZ-S6).

In the CCZ and WFZ:

- Unlimited buildings heights
- A minimum building height in WFZ and CCZ (akin to CCZ-S4 proposed approach)
- Removing PDP depth, internal site separation and outlook requirements (removing WFZ-S3, WFZ-S5, CCZ-S11, CCZ-S12 and CCZ-S13)
- Removing public notification for both CCZ and WFZ
- No COC/design excellence requirements.

<b>Objectives CCZ-02, CCZ-03, CCZ-06 and WFZ-04:</b>			
<p><i>Four objectives that address the roles of the zones in accommodating growth, meeting residential and commercial demands, maximising development capacity, supporting a housing choice, enabling development near mass transit in the CCZ and ensuring urban form and scale reflect the CCZ and WFZs' purposes, whilst managing redevelopment of areas of change in the WFZ.</i></p>			
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p><b>Policies:</b></p> <p>Five policies (CCZ-P4-CCZ-P6, CCZ-P11 and WFZ-P8) relating to CCZ and the WFZ that seek to:</p> <ul style="list-style-type: none"> <li>• Enable high density, good quality residential development within the CCZ which contributes to accommodating anticipated growth and offers a range of housing choice</li> <li>• Recognise the benefits of intensification by enabling greater overall height and scale of development to occur in the CCZ and requiring the development capacity of land to be efficiently optimised</li> <li>• Encourage new development and redevelopment in the CCZ that is adaptable to change in use over time including, sufficiently flexibility for ground floor conversions and residential activities at ground floor subject to certain conditions</li> <li>• Require over and under height, large-scale residential, non-residential and comprehensive development to deliver City Outcomes Contributions (replaces ODP Design Excellence)</li> <li>• For the WFZ enabling redevelopment of Areas of Change from car parking to high quality buildings and/or spaces.</li> </ul> <p><b>Rules:</b></p> <p>A framework of land use and development rules:</p> <ul style="list-style-type: none"> <li>• Permits key activities anticipated in the zones and precinct subject to meeting specified conditions, including residential activity at ground floor in the CCZ subject to specified conditions</li> <li>• Carparking activities at ground level are discouraged through a discretionary status</li> <li>• Provides for other potentially compatible activities as a restricted discretionary or discretionary activity</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Likely to result in gradual, incremental changes to the form and appearance of Te Aro and, to a lesser degree, the South-East, South-West zone edge of the CCZ (Mount Victoria, Mount Cook and Aro Valley interfaces).</li> <li>• Likely associated change in amenity levels within the CCZ, noting however that the level of change proposed is largely driven and mandated by national direction.<sup>3</sup></li> <li>• Will lead to changes in the city scape and is likely to lead to a reduction in sunlight / daylight access to residents, pedestrians and workers in particular locations as a result of increased height limits.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Administrative and compliance costs associated with activities/development that do not meet the relevant effects standards.</li> <li>• Short term costs to plan users and Council consenting teams while building familiarity with the new provisions.</li> <li>• Increased costs to developers if they seek to exceed height limits due to introduction of the COC points based system.</li> <li>• As detailed in the Market and Retail Assessment Report imposition of a maximum height control could inhibit realisation of the full development potential of some sites within the CCZ, contrary to the direction in the NPS-UD to 'enable maximum development capacity'<sup>4</sup>.</li> <li>• As detailed in the Market and Retail Assessment Report imposition of a minimum building height control could potentially reduce development in certain environments due to increased costs of construction to meet this minimum including fire wall and lift requirements and the economic viability of larger scale development,</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Aligns with the purpose and principles of the RMA, particularly s7(b), and reflects relevant directions in the National Planning Standards.</li> <li>• Gives effect to relevant policy directives in the NPS-UD and NZCPS.</li> <li>• Gives heightened effect to the policy intent articulated in policies 30, 31, 54, and 57 of the RPS through: <ul style="list-style-type: none"> <li>○ Clearly aligning with and reflecting the urban growth direction set out in Our City Tomorrow: A Spatial Plan for Wellington City</li> <li>○ Having provisions which enable greater levels of residential growth which will in turn enhance the viability and vibrancy of the CCZ, WFZ, Te Ngākau and in turn STADZ through more activation and investment in these areas.</li> <li>○ Enabling greater densification in the CCZ and WFZ which provides greater housing supply and choice for Wellingtonians (and New Zealanders), as well as more people living closer to work which reduces their car dependency and increases active and public transport use.</li> <li>○ This in turn will encourage investment in, supply and use of safe and attractive environments for walking and cycling and greater access to public services, activities, employment and open spaces.</li> <li>○ Aligns with LWGM's MRT plans and objectives as well as supporting LWGM's investment in CCZ and WFZ streets and public spaces.</li> </ul> </li> </ul>	<p>It is considered that there is certain and sufficient information to support the proposed approach.</p> <p>There is compelling evidence regarding the current housing supply and affordability issues which will be exacerbated by anticipated population growth if action is not taken.</p> <p>There is also clear national direction that necessitates change, with many of the changes in the CCZ in particular mandated through the National Planning Standards and the NPS-UD.</p> <p>The provisions have also been informed by a wide range of reports and studies as set out in Section 5 of this report.</p>

<sup>3</sup> Policy 6 of the NPS-UD states that, "...the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and  
(ii) are not, of themselves, an adverse effect". While there may be perceived environmental and social costs associated with the proposed approach, these are largely negated by the requirements placed on Council to meet the higher order direction to provide for increased density and changing urban environments, particularly for Wellington City as a tier 1 authority.

<sup>4</sup> Refer to the Retail and Market Assessment for WCC, November 2020

<ul style="list-style-type: none"> <li>In the CCZ permits the construction, alteration or addition of buildings and structures subject to compliance with specified effects standards, otherwise are a restricted discretionary activity. No fall back status, developments remain Restricted Discretionary</li> <li>In the CCZ development under the minimum building height is a Discretionary Activity</li> <li>No full public notification of additions, alterations and construction applications</li> <li>In the CCZ and WFZ conversion of buildings for residential activities are enabled through a restricted discretionary consent</li> <li>Tight demolition controls in CCZ and WFZ</li> <li>In the WFZ, construction of new buildings and structures is only permitted for specific conditions, otherwise are Discretionary activity status, with Discretionary Activity consents required to be publicly notified (same as Operative approach)</li> <li>Introduction of City Outcomes Contribution (COC) mechanism in policies, rules and design guides to replace ODP design excellence. Enables substantial height increases if city outcome contributions are given.</li> </ul> <p><b>Standards:</b></p> <ul style="list-style-type: none"> <li>CCZ Maximum Height: ODP height of 27m (8 storeys) increased in Te Aro (Height Control 8) to 42.5m (10 storeys) and ODP South-East, South-West zone edge ODP height of 14.4m and 18.6m (3-5 storeys) increased to 28.5m (8 storeys)</li> <li>Minimum building height of 22m (6 storeys) for all of CCZ</li> <li>Minimum ground floor height of 4m</li> <li>WFZ heights as per ODP.</li> </ul> <p><b>Other Methods:</b></p> <ul style="list-style-type: none"> <li>The Centres and Mixed Use and Residential Design guides are relevant with respect to provisions relating to quality design outcomes, COC and the effects of activities, development and buildings.</li> </ul> <p><b>Zoning:</b></p> <ul style="list-style-type: none"> <li>Extension of CCZ along Adelaide Road and in pockets of Thorndon (Selwyn Terrace and Portland Crescent).</li> </ul>	<p>potentially leaving some land parcels underdeveloped or vacant<sup>5</sup>.</p> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Gradual potential change in amenity levels experienced by residents/pedestrians in the CCZ (e.g. sunlight / daylight access).</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect costs have been identified, noting that cultural and historic heritage values are subject to consideration under separate chapters of the PDP.</li> </ul>	<ul style="list-style-type: none"> <li>Aligns with proposed intensification related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>Specifically aligns with and responds to the proposed objectives.</li> <li>More enabling for new housing developments via enabling greater densities compared to the ODP.</li> <li>Supports LGWM's vision and plans for MRT route through the CCZ and along Adelaide Road, allowing for significant uptake in development capacity along the future route and around yet to be confirmed station locations.</li> <li>Efficient use of existing infrastructure and physical resources, particularly with the more enabling policy and rule framework relating to residential conversions in the CCZ and WFZ.</li> <li>Clear environmental and social benefits from increasing housing supply and choice to meet existing and projected future housing demand.</li> <li>Will help reduce major reliance on greenfield land for future housing through adoption of a distributive approach to addressing anticipated growth pressures in the city.</li> <li>Provides an appropriate level of control over built form and scale of development relative to the role and purpose of the zones, along with a level intensification that is consistent with its predominant character, amenity values and historical patterns of development capacity uptake.</li> <li>Provides for additional development capacity to meet anticipated growth through increased height limits, a minimum building height and the controlled COC mechanism (which allows for height exceedances in return for positive public space, affordability, accessibility and sustainability outcomes).</li> <li>Ensures that the limited number of areas of change in the WFZ are appropriately re-developed to provide high quality buildings and/or public spaces in a manner that manages potential adverse effects and ensures new development is consistent with existing development on the WFZ.</li> <li>The WFZ and STADZ maximum height limits provide consistency with the ODP, and familiarity for plan users, as there is no material change to the proposed heights in these zones relative to the ODP.</li> <li>Changing the zoning of Adelaide Road to allow for more intensive development in the area and to</li> </ul>	
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<sup>5</sup> Refer to the Retail and Market Assessment for WCC, November 2020

		<p>support LGWM's plans will accelerate change in use from industrial to mixed-use with residential.</p> <ul style="list-style-type: none"> <li>• Reduces the likelihood and extent of vacant and underutilised land in the WFZ and CCZ through tighter demolition rule requirements, which in turn improves streetscape amenity and encourages increased levels of site optimisation.</li> <li>• Provides for alignment with the Te Ngākau Precinct Framework and vision for the precinct, as well as the anticipated redevelopment and activity that this area needs to enhance its vibrancy, vitality, use and resilience to natural hazards and climate change risks.</li> <li>• Provides for the more small-scale anticipated growth and re-development anticipated in Te Ngākau that the ODP provisions do not currently enable through the current Civic Centre Heritage Area control.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• The non-notification clause with respect to building development increases the level of certainty for property owners and developers reduces the associated cost of compliance.</li> <li>• Increased height limits in certain areas of the CCZ provide opportunities to realise greater development potential, apart from sites/areas subject to qualifying matters.</li> <li>• Clear and directive standards reduce uncertainty during the consenting process.</li> <li>• Provides greater certainty regarding expected building densities and acceptable effects.</li> <li>• Increased building densities provide opportunities to increase inner city housing supply, enabling greater choice and improved affordability.</li> <li>• Increased building densities provide for additional commercial capacity, thus creating additional economic growth and employment opportunities.</li> <li>• Minimum building height control encourages increased optimisation of site development potential.</li> <li>• Increased height limits and COC provides developers with greater opportunities to maximise development capacity and increase returns.</li> <li>• Increased house building activity and supply of housing will support employment in construction and associated support services such as real estate, development finance and other activities associated with the construction, purchase and sale of property.</li> <li>• Improved development capacity opportunities that enable greater levels of residential growth in the CCZ</li> </ul>	
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		<p>will increase the commercial viability of the CCZ, including more people investing in CCZ business, retail, hospitality etc.</p> <ul style="list-style-type: none"> <li>• Enabling conversion of office space to residential will improve land use efficiency and help to counteract the growing housing shortage in the city.</li> <li>• Enabling greater levels of residential growth in the CCZ and WFZ will increase the use of the Stadium and attendance numbers at Stadium events, therefore having positive effects on the Stadium's vitality and vibrancy.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Enables more flexibility and choice of housing type that better aligns with people's needs and lifestyle preferences.</li> <li>• Increase in the vitality and vibrancy of the CCZ and surrounding areas (i.e. WFZ) resulting from uptake of the development opportunities enabled.</li> <li>• Supports more 24/7 activity, particularly night time activity, thereby enhancing the vibrancy and safety of the CCZ.</li> <li>• Allowing residential activity along 'non-active' street frontages enhances the vibrancy, vitality and safety of these streets, with more movement and eyes on the street.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• No direct or indirect benefits have been identified, noting that cultural and historic heritage values are subject to consideration under separate chapters of the PDP.</li> </ul>	
<p><b><u>Effectiveness and efficiency</u></b></p>	<p><b><i>Effectiveness</i></b></p> <p>The proposed provisions are the most appropriate method of achieving the objectives relating to the intensification, accommodation of growth, efficient utilisation of sites and urban form of the CCZ, WFZ and Te Ngākau precinct. They provide for additional densities and bulk of development while also giving clear direction and guidance regarding the expected quality of the built environment.</p>	<p><b><i>Efficiency</i></b></p> <p>It is considered that the proposed approach is the most efficient means of achieving the relevant objectives. It provides a clear and integrated framework to achieve the outcomes sought for the CCZ, WFZ and Te Ngākau. In particular, it increases opportunities for housing alongside provisions to achieve quality living environments and well-functioning urban environments.</p> <p>It is based on sound evidence, and has been developed through an extensive consultation process. It also offers an efficient approach to implementing higher order direction and provides a high level of certainty to landowners, residents, developers, the community and Council.</p> <p>Overall, the costs are considered negligible relative to the benefits derived from the proposal.</p>	

<p><b>Overall evaluation</b></p>	<p>Overall this approach is the most appropriate means of achieving the proposed objectives as it provides an appropriate balance between enabling opportunities for growth and development to occur in the CCZ, WFZ and Te Ngākau precinct while ensuring measures are in place to preserve amenity and manage adverse effects. It also satisfies relevant policy directives in the NPS-UD and RPS and relevant directions in the National Planning Standards.</p> <p>Additionally, the benefits of the approach outweigh the costs, there are considerable efficiencies to be gained from adopting the proposed provisions and there is sufficient information on which to act.</p>		
<p><b>Option 1a: Alternative approach to provisions (more permissive approach)</b></p>	<p><b>Costs</b></p>	<p><b>Benefits</b></p>	<p><b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b></p>
<p>This option is a variation on Option 1 and involves the introduction of more permissive approach including:</p> <p>In the CCZ:</p> <ul style="list-style-type: none"> <li>• DDP CCZ comprehensive development rule to enable amalgamation of land in CCZ as proposed in the CCZ DDP chapter</li> <li>• No adjoining site specific building height control limits (i.e., no PDP CCZ-S2 and CCZ-S3).</li> </ul> <p>In the WFZ:</p> <ul style="list-style-type: none"> <li>• Making development in the WFZ RDA with use of an RDA default setting for activities not compliant with relevant standards (akin to CCZ proposed approach)</li> <li>• Removing PDP WFZ site coverage standard (WFZ-S6).</li> </ul> <p>In the CCZ and WFZ:</p> <ul style="list-style-type: none"> <li>• Unlimited buildings heights</li> <li>• A minimum building height in WFZ and CCZ (akin to CCZ-S4 proposed approach)</li> <li>• Removing PDP depth, internal site separation and outlook requirements (removing WFZ-S3, WFZ-S5, CCZ-S11, CCZ-S12 and CCZ-S13)</li> <li>• Removing public notification for both CCZ and WFZ</li> <li>• No COC/design excellence requirements.</li> </ul>	<p>Further to the costs already outlined in Option 1 the following additional costs have been identified:</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Less effectively responds and supports the outcomes sought by the proposed objectives, particularly those relating to amenity and design quality.</li> <li>• Fails to adequately address strong community concerns relating to the scale and effects of change resulting from proposed intensification, something that would be exacerbated by this option.</li> <li>• Fails to adequately address complementary objectives that seek positive change and amenity outcomes.</li> <li>• Adverse amenity outcomes such as shading, building dominance, lack of privacy etc would be exacerbated relative to the proposed approach.</li> <li>• This approach would result in poor on-site amenity and greater amenity impacts within the CCZ and WFZ and on surrounding residential areas.</li> <li>• Considerable change to the scale and urban form of the CCZ and WFZ due to the relatively unmanaged exercise of ad hoc development height, form and scale.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Premised on an assumption that increased yield equates to increased feasibility and profit, noting that a high standard of development with good amenity also supports a higher price point.<sup>6</sup></li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Perverse health and wellbeing outcomes due to lack of bulk and location controls to maintain a reasonable level of amenity for users and residents of the CCZ and WFZ.</li> </ul> <p><b>Cultural</b></p>	<p>Further to the benefits already outlined in Option 1 the following additional benefits have been identified:</p> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Significantly enables a level of development capacity that more closely aligns with the policy directives in the NPS-UD.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Imposes fewer constraints on development rights.</li> <li>• Reduced administrative and compliance costs, including cost savings to developers of not having to comply with height related bulk and location controls and COC and avoiding associated public notification requirements.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Potential to accommodate more people in the city centre if development capacity is significantly increased.</li> </ul>	<p>There is considered to be insufficient information to support this approach.</p> <p>The current approach of having maximum height limits in the CCZ, a zero height limit in the WFZ, adjoining site specific building height limits and bulk and location controls is well-established within the ODP, is entrenched in case law and supported by evidence.</p> <p>The evidence base and consultation carried out does not support the need to move away from this approach.</p> <p>There is also a lack of testing and evidence that supports a conclusion that the alternative approach would achieve the outcomes sought for the CCZ, and it is clear this is likely to generate significant perverse environmental and social costs if implemented.</p>

<sup>6</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report



	<ul style="list-style-type: none"> <li>Inadequate recognition and maintenance of the important open space values associated with the waterfront.</li> </ul>		
<b>Effectiveness and efficiency</b>	<p><b>Effectiveness</b></p> <p>This is not considered to be the most appropriate approach for achieving the CCZ and WFZ zone objectives.</p> <p>While it enables increased development capacity in the CCZ and WFZ and is likely to result a reduction in consenting and compliance costs, it is anticipated that this would come at a significant adverse environmental and social cost. The relative costs significantly outweigh the benefits as outlined above.</p> <p>It not considered to be an effective method of meeting the proposed objectives as it untested in both the local and national context and is unsupported by evidence and consultation feedback received to date.</p>	<p><b>Efficiency</b></p> <p>Although the approach would be an efficient means to optimise development capacity in the CCZ and WFZ it would be contrary to other outcomes sought within these zones relating to quality design, amenity and managing adverse effects.</p> <p>It also presents significantly greater uncertainty for communities and Council in relation to the degree and effects of change compared to the preferred option.</p>	
<b>Overall evaluation</b>	<p>This option is not considered an appropriate means to achieve the proposed intensification and growth objectives as it would act to significantly undermine the proposed purpose of the CCZ and WFZ along with the quality design, amenity values and managing adverse effects outcomes sought. Overall it would create perverse outcomes. Whilst the approach supports the intensification policy direction of the NPS-UD, it potentially overcompensates on this aspect of the NPS at the expense of creating 'well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future'. The approach would also be ineffective in delivering on the relevant objective and policies in the RPS and the goals and related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</p>		
<b>Option 2: Status Quo</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p><b>Policies:</b></p> <p>11 policies broadly speak to the topics of urban form and new development (not growth or land use efficiency). These policies cover a wide array of matters including:</p> <ul style="list-style-type: none"> <li>Defining the extent of the Central Area to enhance its compact character.</li> <li>Contain development within the Central Area.</li> <li>Preserve the present 'high city/low city' general urban form of the Central Area.</li> <li>Provide for the future integrated development of the Pipitea Precinct, ensuring it complements the established part of the central city and reinforces its urban form.</li> <li>Manage building height in the Central Area to reinforce the high city/low city.</li> <li>Manage building mass in conjunction with building height.</li> <li>Allowing height exceedances in certain situations</li> <li>Requiring design excellence for any building higher than the height standard.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Conflicts with the NPS-UD directive that the Council, as a tier 1 local authority, needs to provide for well-functioning urban environments that have sufficient development capacity to meet the different needs of its people and communities, including ensuring capacity is maximised in CCZs.</li> <li>Contrary to the urban intensification direction set out in Our City Tomorrow: A Spatial Plan for Wellington City, particularly in the CCZ.</li> <li>Gives only partial effect to RPS objectives and policies.</li> <li>Less effectively and deliberately responds and supports the outcomes sought by the proposed objectives.</li> <li>Less clear and directive policy framework within which to consider the effects of building activities on the role, scale, amenity and character anticipated within the CCZ, WFZ, STADZ and Te Ngākau precinct.</li> <li>Built form standards do not necessarily reflect the anticipated role, scale, amenity and character anticipated within these zones and the intensification outcomes sought by the NPS-UD.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Although less directive than the proposed approach it broadly aligns with the purpose and principles of the RMA, particularly s7(b)</li> <li>Maintaining the current bulk, location, amenity and character controls addresses some of the community concerns regarding the scale and effects of change proposed in the preferred option.</li> <li>Aligns with the Compact goal and related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>The current approach to the waterfront area aligns with case law outcomes and the Wellington Waterfront Framework.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Relatively cost effective to implement as limited drafting required and landowners, developers and</li> </ul>	<p>The operative provisions have largely been in place since 2000, supplemented by amendments largely made through Plan Change 48 in 2013.</p> <p>There is clear information and evidence that confirms that the current provisions:</p> <ul style="list-style-type: none"> <li>- Are out of date and not fit for purpose in terms of meeting requirements under the NPS-UD;</li> <li>- Do not give effect to higher order direction; and</li> <li>- Do not provide sufficient development capacity.</li> </ul>

<p><b>Rules and standards:</b></p> <ul style="list-style-type: none"> <li>Rules that provide for activities compatible with the zones' purpose as permitted activities with defaults to either RDA or DA status.</li> <li>Rule flexibility where maximum building height must not be exceeded by more than 35% and no massing standard exceedance, or both maximum building height and massing standard by 15% only.</li> <li>Height limits ranging from 55-95m.</li> </ul> <p>The different rules and standards that apply in the CCZ and WFZ are set out in Section 5 of this report.</p> <p><b>Other Methods:</b></p> <ul style="list-style-type: none"> <li>Design excellence.</li> <li>Central Area design guide.</li> </ul>	<ul style="list-style-type: none"> <li>Fails to adequately address existing and projected housing needs and would exacerbate current issues relating to housing affordability and choice.</li> <li>Inadequately recognises and distinguishes the differing roles and characteristics of the city centre, waterfront, stadium and Te Ngākau/civic centre and the development outcomes sought relative to their respective purpose.</li> <li>Offers reduced clarity and certainty regarding how the CCZ will meet anticipated residential and commercial growth and demand in the area.</li> <li>Presents a risk of ad-hoc and inefficient development due to the absence of adequate policy guidance relating to accommodating growth and efficient utilisation sites in the CCZ, particularly those that are vacant or underutilised.</li> <li>Continuation of a design excellence policy that lacks clarity regarding Council's policy intent or outcomes anticipated, thereby creating a lack of certainty for Council, developers and the wider community.</li> <li>Lack of clear policy direction for Areas of Change on the Waterfront presents a risk that ad-hoc development could occur in this area that is inconsistent with existing development, the Wellington Waterfront Framework direction and the zone's unique identity.</li> <li>Retention of the Civic Centre Heritage Area and lack of clear policy direction for enabling redevelopment of Te Ngākau to respond to and align with the Te Ngākau Precinct Framework direction, natural hazard and climate change effects and to add more vibrancy and vitality to the precinct, presents a risk that ad-hoc development could in this area that is inconsistent with the framework or that redevelopment could be prevented all together and this area continues to lack the vitality and vibrancy it needs and deserves.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Failing to address the lack of housing supply to meet current and future needs will have wider economic implications for the city.</li> <li>Does not enable housing choice and will result in more people being driven to live outside of the CCZ and potentially even outside the city due to transport costs.</li> <li>Misaligns with LGWM's MRT development capacity and uplift requirements and could compromise the ability for MRT to come to fruition.</li> <li>Restricts the redevelopment anticipated in Te Aro through the retention of more restrictive development standards.</li> </ul>	<p>the community are already familiar with the provisions.</p> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Continuation of the existing approach provides familiarity along with a level of certainty to the community as to the likely development outcomes anticipated.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect benefits have been identified, noting that cultural and historic heritage values are subject to consideration under a separate chapter of the ODP.</li> </ul>	<p>The key risks of maintaining the current approach is that:</p> <ul style="list-style-type: none"> <li>It will exacerbate the city's housing supply and affordability issues; and</li> <li>Is likely be found to be an inappropriate and unsupportable approach to meeting Councils higher order statutory requirements.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Increased administrative and compliance costs associated with activities/development that do not meet relevant standards relative to the proposed provisions.</li> <li>• Limits the commercial viability and economic benefits derived from accommodating the level of growth anticipated in the CCZ.</li> <li>• Unlikely to be responsive or flexible enough to accommodate anticipated growth pressures in the city and to satisfy NPS-UD policy directives.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Limits the exercise of residential locational choice within the city. Particularly for residents seeking to live in the City Centre, in more denser developments such as apartments.</li> <li>• More difficult to understand and apply given the relatively complex and less integrative structure and construction of provisions.</li> <li>• Built form standards may unduly restrict some types or scale of building, which could limit the ability to meet anticipated housing demand.</li> <li>• Although offering a degree of familiarity the provisions are dated and inconsistent with the high order direction.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• No direct or indirect costs have been identified, noting that cultural and historic heritage values are subject to consideration under separate chapters of the ODP.</li> </ul>		
<b><u>Effectiveness and efficiency</u></b>	<p><b>Effectiveness</b></p> <p>The current policy framework has limited effectiveness as it is somewhat ambiguous and lacks clear direction, particularly in relation to intensification, accommodation of growth, efficient utilisation of sites and urban form of the CCZ, and future development of the Te Ngākau precinct and Areas of Change in the WFZ.</p> <p>Consequently, it is open to interpretation and could inadvertently compromise the outcomes sought by the proposed objectives. The status quo is not the most effective method of meeting the proposed objectives based on the costs outlined above.</p>	<p><b>Efficiency</b></p> <p>The status quo is not the most efficient method of meeting the proposed objectives given the relative costs versus benefits identified above. There is clear information and evidence that confirms that the current provisions are out of date, not fit for purpose in a number of respects, and fail to implement higher order direction.</p> <p>The approach does not enable the efficient use of CCZ and WFZ areas as a physical resource and is unlikely to be an efficient vehicle to facilitate the increase in housing supply required to meet anticipated demand and to effect positive urban change in the CCZ.</p>	
<b><u>Overall evaluation</u></b>	<p>This approach is not an appropriate means to achieve the proposed objectives to enable sufficient development capacity within the zone. It lends itself to more open interpretation and is less likely, relative to the proposed provisions, to constructively assist the Council in determining the appropriateness of development that could undermine the intent of the CCZ and WFZ to an extent. The approach would also be less effective in delivering on the relevant NPS-UD and National Planning Standards directives and objective and policies in the RPS.</p>		

**11.5 Provisions to achieve Objectives CCZ-05, WFZ-03, STADZ-02, CCZ-07, WFZ-07 and STADZ-04 (density done well – providing for amenity and managing effects)**

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo

<b>Proposed objectives CCZ-05, WFZ-03, STADZ-02, CCZ-07, WFZ-07 and STADZ-04:</b>			
<i>Six objectives that seek that development in the CCZ, WFZ, STADZ and Te Ngākau contributes to creating a high quality, well-functioning urban environment, contributes to the zone or precinct's identity and sense of place, provides a quality and level of public and private amenity, maintains and enhances the safety and amenity of public space, provides for resilient urban environments that respond to natural hazards and climate change effects and acknowledge and sensitively respond to adjoining residential and open space zoned land, heritage buildings, areas, character areas and sites of significance to Māori.</i>			
<b>Option 1: Proposed approach (recommended)</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p><b>Policies:</b></p> <p>Ten policies (CCZ-P8-CCZ-P12, CCZ-PREC-P2, CCZ-PREC-P4, WFZ-P5-WFZ-P7, WFZ-P9 and STADZ-P5) relating to CCZ, WFZ, STADZ and Te Ngākau that seek to:</p> <ul style="list-style-type: none"> <li>• Provide for good quality new development and supporting public space that reinforces the CCZ, WFZ and Te Ngākau precinct identity and unique sense of place.</li> <li>• Require new development to positively contribute to sense of place, visual quality, safety and amenity of the CCZ, WFZ, STADZ and Te Ngākau precinct.</li> <li>• Achieve a high standard of amenity for residential activities that reflects the higher density scale of development anticipated in the CCZ.</li> <li>• Require over and under height, large-scale residential, non-residential and comprehensive development to deliver COC (replaces ODP Design Excellence).</li> <li>• Whilst recognising the density of development anticipated in respective zones and Te Ngākau, manage associated adverse effects.</li> <li>• Provide for the staged redevelopment of the Te Ngākau Civic Square Precinct.</li> <li>• Ensure development responds to any identified significant natural hazard risks and climate change effects, including strengthening and adaptive reuse.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Potential reduction in overall land use efficiency resulting from proposed design and amenity controls, which could have a negative impact on development viability and uptake.</li> <li>• Proposed Te Ngākau provisions represent a moderate shift away from the current ODP approach of applying a heritage area and related provisions to manage development and amenity in the precinct.</li> <li>• Enables greater maximum buildings heights on sites adjoining character and heritage areas than the current ODP approach.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Potential impacts on development yield and the economic viability of new development resulting from the mix of current and new bulk and location standards proposed.<sup>7</sup></li> <li>• Reasonably significant opportunity cost for new developments on sites abutting listed open space zoned public spaces due to sunlight access control (maintenance of sunlight access during certain hours), with new sites also added in CCZ and WFZ.</li> <li>• Reasonably significant opportunity cost for new developments on sites abutting character precincts or residentially zoned heritage areas (height in relation to boundary restriction), noting that the impact is very</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Aligns with the purpose and principles of the RMA, particularly ss6(a), (d)-(f) and (h) and ss7(c), (f) and (i), and reflects relevant directions in the National Planning Standards.</li> <li>• Gives heightened effect to the policy intent articulated in policies 20, 21, 29, 30, 31, 33, 35, 36, 46, 51, 52, 54, 55, and 57 of the RPS through: <ul style="list-style-type: none"> <li>○ Managing potential adverse effects from development on historic heritage buildings, areas and structures, sites and areas of significance to Māori, character precincts and public spaces.</li> <li>○ Seeking that buildings and public spaces are designed to be resilient to the impacts of natural hazards and climate changes, thus minimising risks and consequences of natural hazards and climate change in these areas.</li> <li>○ Having provisions that seek to enable higher density and mixed-use development whilst also maintaining and enhancing the vibrancy and vitality of the CCZ, WFZ, STADZ and Te Ngākau through enhancing amenity and design quality outcomes and managing adverse effects.</li> </ul> </li> </ul>	<p>It is considered that there is certain and sufficient information to support the proposed approach.</p> <p>The provisions have also been informed by a wide range of reports and studies as set out in Section 5 of this report. The evidence base for acting is comprehensive.</p> <p>There is also clear national direction that necessitates change, and many of the changes for the CCZ, WFZ, STADZ and Te Ngākau are mandated through the National Planning Standards and the NPS-UD.</p> <p>In the case of Te Ngākau, this is supported by a vision in the Te Ngākau Framework which has undergone extensive community, councillor and mana whenua engagement.</p> <p>The Central City, Waterfront, Stadium and Te Ngākau (to a degree) already have a strong policy framework focussed on</p>

<sup>7</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report, section 6.2

<ul style="list-style-type: none"> <li>• Protect the WFZ’s mapped public open spaces by avoiding new permanent buildings above-ground on public open space except where they improve space.</li> <li>• Maintaining and enhancing the Stadium’s landmark status.</li> </ul> <p><b>Rules:</b></p> <p>A framework of land use and development rules:</p> <ul style="list-style-type: none"> <li>• Permits residential activity at ground floor in the CCZ subject to specified conditions.</li> <li>• Carparking activities at ground level are discouraged through a discretionary status.</li> <li>• Tight demolition controls in CCZ, WFZ, STADZ and Te Ngākau. With conditions being threat to life, creation of public or private space or if there’s an approved consent. If conditions are not met it become a non-complying activity.</li> <li>• Introduction of COC mechanism in policies, rules and design guides to replace ODP design excellence. Enables five potential positive city outcomes to be provided for additional height.</li> <li>• Substantial matters of discretion and assessment criteria’s if permitted standards are breached.</li> <li>• Outdoor storage screening rule.</li> </ul> <p><b>Standards:</b></p> <ul style="list-style-type: none"> <li>• Some consistent CCZ and WFZ standards that address: minimum sunlight access – public space, minimum residential unit size, outlook space, building separation distance.</li> <li>• The WFZ also has a unique zone site coverage based of Waterfront Framework.</li> <li>• The CCZ has the following unique standards: Adjoining site specific buildings heights for Old St Paul’s Church, Character Precincts and Residentially Zoned Heritage Areas, verandahs, active frontage control, outdoor living space and a maximum building depth.</li> <li>• STADZ and Te Ngākau precinct have maximum height standard, with STADZ also having an access standard. No specific amenity standards.</li> </ul> <p><b>Precinct Spatial Layer:</b></p> <ul style="list-style-type: none"> <li>• Application of a precinct approach to managing the land use activities, redevelopment, amenity and heritage values of the Te Ngākau Civic Square.</li> </ul> <p><b>Other Methods:</b></p>	<p>limited in the CCZ as it only abuts one character precinct and a limited number of residentially zoned heritage areas.</p> <ul style="list-style-type: none"> <li>• Potential additional compliance costs associated with new screening requirements at the time of redevelopment.</li> <li>• Imposes consenting and assessment costs on property owners and developers where design and amenity related standards and policy considerations apply.</li> <li>• Proposed depth and internal site setback standards reduce the potential to optimise the full development capacity of sites in the CCZ to a minor to moderate degree.</li> </ul> <p><b>Social and Cultural</b></p> <ul style="list-style-type: none"> <li>• The shift in provisions for Te Ngākau away from a heritage area in the ODP may be perceived as a social and cultural cost by some within the community.</li> </ul>	<ul style="list-style-type: none"> <li>○ Having provisions that support a compact, well and designed and sustainable urban form, as well as supporting an increased up take in active and public transport and reduction in car dependency.</li> <li>○ Preserving the natural character of the coastal environment and managing any adverse impacts from development and activities.</li> <li>○</li> </ul> <ul style="list-style-type: none"> <li>• Aligns with related directions in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>• Specifically aligns with and responds to the proposed objectives.</li> <li>• Aligns with the current ODP approach which includes an existing policy framework to manage design, amenity and adverse effects and carries over some associated standards i.e. sunlight control to public space and recession plane control for Old St Paul’s.</li> <li>• Provides much more targeted policies, standards and a COC mechanism to achieve good amenity, design, mitigation and resilience outcomes and to meet the well-functioning urban environment objective and associated policy directive in the NPS-UD.</li> <li>• Strikes an appropriate balance between enabling intensification, achieving good design, amenity and wellbeing outcomes and mitigating adverse effects.</li> <li>• Improved residential and non-residential. development standards and design guidance will result in enhanced amenity values and high quality urban environments and potentially reduce reverse sensitivity effects resulting from increased residential development in mixed-use environments.</li> </ul> <ul style="list-style-type: none"> <li>• The proposed Te Ngākau precinct offers an effective means to manage the area, particularly as it is reinforced and underpinned by the Te Ngākau Framework which was widely engaged on and has community, Councillor and Mana Whenua support.</li> <li>• The Te Ngākau precinct approach retains the best aspects of the current ODP approach with heritage retention, quality design outcomes and a civic purpose, while providing greater opportunities for regeneration including a sharper focus on mixed use, design quality and amenity, management of adverse effects, and resilience to hazards and climate change events.</li> </ul>	<p>supporting amenity outcomes and managing adverse effects. The proposed provisions build on this with targeted methods, and provide specific direction for Te Ngākau.</p> <p>The costs and benefits associated with the imposition of design and amenity outcomes are reasonably well understood. Overall, the risk of not acting is considered to be greater than the risk of acting.</p>
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<ul style="list-style-type: none"> <li>The Centres and Mixed Use and Residential Design guides are relevant with respect to provisions relating to amenity, quality design outcomes, COC and the effects of activities, development and buildings.</li> </ul>		<ul style="list-style-type: none"> <li>The proposed STADZ PDP approach offers an effective means to manage the Stadium and Fran Wilde Walkway, particularly as it provides the Stadium with a standalone zone framework which aligns with the National Planning Standards and is only focused on the Stadium, unlike the ODP approach.</li> <li>Through having a Stadium Zoning, it recognises the strategic importance and benefits of the Stadium to the city and region, which is recognised in the tailored objectives, policies and rule framework. It also is more enabling of Stadium activities (primary and ancillary) through a new stadium activities definition and enabling rule framework.</li> <li>The STADZ zoning approach for the Stadium retains the best aspects of the current ODP approach with a policy framework seeking to support the continuing operation of the Stadium, encouragement of public and active transport over car use, maintenance of existing pedestrian access, management of adverse effects and provision for special entertainment events. However, it also includes a stronger focus on urban form, quality design and amenity outputs, specific recognition of the Fran Wilde Walkway, resilience to natural hazards and climate change and recognition of cultural and historical values, including those of importance to tangata whenua.</li> <li>The PDP STADZ specifically refers to and provides targeted objectives and policies for the Fran Wilde Walkway. Unlike the ODP, which stays silent on the walkway. This PDP approach seeks to ensure that Wellington Regional Stadium is well integrated with existing and any future public transport nodes and pedestrian routes to maintain high quality pedestrian access, particularly via the Fran Wilde Walkway. This has positive impacts upon the STADZ, WFZ and CCZs' connectivity to one another.</li> <li>Provides greater certainty and an improved zone interface between the CCZ and WFZ and adjoining residential/open space properties resulting in a reduced impact on their associated amenity values.</li> <li>Grounded by a comprehensive evidence base, with proposed standards subject to robust internal and external testing and review.</li> <li>Increase in the number of public spaces in the CCZ and WFZ with protected sunlight access (28 in total, up from 13 in the ODP), with this contributing to the well-functioning urban environment outcome sought</li> </ul>	
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		<p>by the NPS-UD and aligning with the vision of the Council's Green Network Plan.</p> <ul style="list-style-type: none"> <li>Proposed amenity and bulk and location standards potentially result in greater solar access, lower carbon emissions, greater provision of open space and increased living spaces.<sup>8</sup></li> <li>COC mechanism provides a clear, well defined mechanism for Council to negotiate improved city outcomes with developers in return for additional building height.</li> <li>The COC matrix system provides transparency around Council's expectations, flexibility for developers regarding the choice of outcome they want to contribute to and encourages the achievement of multiple outcomes.</li> <li>The COC mechanism is based on overseas best practice approaches to achieving improved design outcomes, supported by evidence and lessons learnt from implementing, evaluating and implementing current design excellence provisions.</li> <li>Retains important quality outcome related controls from the ODP, including active street frontages and verandahs, enhancing the public vs private interface and public amenity and safety of the street.</li> <li>Introduces improved development standards to enhance residential and public amenity outcomes, including minimum unit size, outdoor living space and outlook standards.</li> <li>The proposed building depth standard contributes to privacy and averting overdominance by preventing buildings overlooking each other and enables improved sunlight access into the centre of sites.</li> <li>Protects sunlight access to open space areas, with a degree of flexibility built in response to addressing identified intensification needs.</li> <li>Introduces enhanced policy direction centred on urban resilience to earthquakes and climate change, supported by complementary COC outcomes like green star buildings and seismic resilience.</li> <li>Provides greater certainty regarding anticipated screening requirements and boundary treatment where CCZ sites abut residentially zoned properties.</li> </ul> <p><b>Economic</b></p>	
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<sup>8</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report

		<ul style="list-style-type: none"> <li>• Provision of a high standard of development with good amenity supports and increases the potential achievement of a higher return.<sup>9</sup></li> <li>• Introduction of the new minimum 70% sunlight method as part of the CCZ and WFZ sunlight control enables more development capacity than the current ODP approach and balances intensification with amenity objectives.</li> <li>• Proposed amenity and bulk and location standards have the potential to lower household costs (i.e. heating and drying) through improved solar access.<sup>10</sup></li> <li>• Potential reduction in health costs resulting from improved sunlight access and outdoor space provision and increased living space/reduced overcrowding.</li> <li>• Through having a clear definition for stadium activities, which includes primary and ancillary activities, and a more enabling framework, this potentially reduces resource consent requirements and costs to the Stadium as there is a clearer framework about what activities are enabled or not.</li> <li>• This in turn has a positive effect on the Stadium's (and Wellington's) economic wellbeing, and also assists WCC's resource consent team with a clearer understanding of what activities are permitted within the STADZ.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Creation of more attractive public spaces and urban form.</li> <li>• Potentially greater provision of activities and events at the Stadium if they fall within the definition of stadium activities definition.</li> <li>• Provision of a high level of residential amenity not only creates direct health and wellbeing benefits for residents but also contributes to broader community, environmental and urban character benefits.<sup>11</sup></li> <li>• Enhanced residential amenity resulting from proposed amenity (minimum unit size, outlook and living space) and depth and internal setback standards.</li> <li>• Potential improvements in public health related outcomes (mental and physical) i.e. dryer, warmer</li> </ul>	
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<sup>9</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report

<sup>10</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report

<sup>11</sup> Refer to The Property Group (2022) Wellington City District Plan Proposed Amenity and Design Provisions Cost Benefit Analysis report



		<p>homes and greater sense of community through shared outdoor spaces.</p> <ul style="list-style-type: none"> <li>• Enables, via the COC, opportunities to: <ul style="list-style-type: none"> <li>○ Increase the extent of assisted housing in the CCZ.</li> <li>○ Integrate greater universal accessibility design into the CCZ through introducing a lifemark rating system.</li> <li>○ Address the current open space deficiency and increase public space amenity in the CCZ via methods such as public open space, laneways, gardens, playgrounds etc.(aligning with the Council's Green Network Plan).</li> <li>○ Enhance the CCZ's urban sustainability and resilience, encouraging green star ratings, adaptive reuse, reduction in embodied carbon and additional seismic resilience.</li> </ul> </li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Continues and builds on current ODP approach to managing adverse effects, ensuring development responds to site context where located adjacent to things like scheduled sites of significance to Māori, heritage buildings and character precincts.</li> </ul>	
<b><u>Effectiveness and efficiency</u></b>	<p><b>Effectiveness</b></p> <p>The proposed approach provides a clear and integrated framework to achieve the outcomes sought for the CCZ, STADZ, WFZ and Te Ngākau. Although it broadly aligns with the current ODP framework more targeted policies, rules, standards and design guidance are provided.</p> <p>This approach is based on sound evidence, has been developed through an extensive consultation process and effectively implements all higher order directions. It also enables improved residential amenity outcomes in the CCZ, WFZ and Te Ngākau precinct relative to the ODP, whilst also continuing the current focus on public amenity outcomes.</p> <p>The proposed provisions provide the most appropriate method to meet the objectives regarding management of the use and scale of development at the CCZ and STADZ zone interface. They also provide effective direction regarding the interface treatment for new development within the CCZ, WFZ and STADZ.</p>	<p><b>Efficiency</b></p> <p>This approach strikes an appropriate balance between enhancing amenity, design and resilience outcomes and mitigating building effects within the CCZ, WFZ, STADZ and Te Ngākau precinct while also enabling greater intensification and more efficient use of sites in these areas.</p> <p>The approach is efficient in terms of the level of certainty provided to landowners and plan users generally, with the costs considered negligible relative to the benefits identified above.</p>	
<b><u>Overall evaluation</u></b>	<p>The proposed policies, rules, standards, design guidance and COC mechanism are the most appropriate way of achieving the objectives relating to creating a high quality, well-functioning urban environment, contributing to the zone or precincts' identity and sense of place, providing a level of public and private amenity, providing resilient environments and managing adverse effects through sensitive design treatment. They encourage increased development densities while providing clear guidance on the anticipated level of amenity and quality of built development. Along with retaining important quality outcome controls from the ODP like active street frontages and verandahs, they also provide new development standards and the COC to enhance residential and</p>		

	public amenity outcomes. They place a stronger focus on urban resilience through stronger policy direction and COC outcomes and build on existing zone interface controls. The approach also satisfies relevant policy directives in the NPS-UD and RPS and relevant directions in Our City Tomorrow: A Spatial Plan for Wellington City.		
<b>Option 2: Status Quo</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</b>
<p><b>Policies:</b></p> <p>45 policies broadly speak to the topics of quality design outcomes, amenity, resilience and managing adverse effects (this excludes policies relating to noise, wind and signs and hazardous substances). These policies cover a wide array of matters including:</p> <ul style="list-style-type: none"> <li>Enhance the public environment.</li> <li>Require high quality building design.</li> <li>Ensure that new buildings and structures do not compromise the context, setting and streetscape.</li> <li>Ensure that new buildings acknowledge and respect the form and scale of the neighbourhood and achieve appropriate height adjacent to heritage and character.</li> <li>Manage building mass in conjunction with building height to ensure quality design outcomes.</li> <li>Require design excellence for any building that is higher than the height standard specified.</li> <li>Advocate for new building work to be designed in a way that minimises overshadowing of any public open space.</li> <li>Ensure that activities are managed to avoid, remedy or mitigate adverse effects.</li> <li>Ensure that the adverse effects on the natural environment arising from a hazard event are avoided, remedied or mitigated.</li> </ul> <p><b>Rules and standards:</b></p> <p>The different rules and standards that apply in the Central Area are set out in Section 5 of this report.</p> <p><b>Other Methods:</b></p> <ul style="list-style-type: none"> <li>Design excellence.</li> <li>Central Area design guide.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Misaligns with the purpose and principles of the RMA, particularly ss7(c) and (f).</li> <li>Conflicts with the NPS-UD directive that the Council, as a tier 1 local authority, needs to provide for a well-functioning urban environments that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</li> <li>Contrary to relevant directions set out in Our City Tomorrow: A Spatial Plan for Wellington City.</li> <li>Gives only partial effect to RPS objectives and policies.</li> <li>Less effectively and deliberately responds and supports the outcomes sought by the proposed objectives.</li> <li>Offers reduced policy direction, clarity and certainty regarding the character and amenity values anticipated within the zones and precinct.</li> <li>Achievement of quality design and amenity outcomes in the Central Area has been internally assessed by Council as patchy.</li> <li>Unlike the proposed COC mechanism the current design excellence mechanism lacks clarity and certainty for developers, communities and the Council, resulting in mixed success.</li> <li>The current massing control has been identified as ineffectively achieving the residential amenity outcomes anticipated in the central area and additional amenity controls should be considered.<sup>12</sup></li> <li>While there is an objective and various policies relating to the Stadium in the ODP approach, which covers aspects such as the continuing operation of the Stadium, there is no policy direction relating to the Stadium's urban form, quality design and amenity outputs, resilience to natural hazards and climate change, historical and cultural values, including for tangata whenua, or specific recognition of the Fran Wilde Walkway.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Maintaining the current bulk, location, amenity and character controls would address some of the community concerns regarding likely amenity effects arising from proposed increases in intensification.</li> <li>Intent of the current design excellence mechanism is to create high quality building design and provides an opportunity for Council to negotiate good outcomes with developers.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>No additional amenity related administrative and compliance costs.</li> <li>Relatively cost effective to implement as limited drafting required and landowners, developers and the community are already familiar with the provisions.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Continuation of the existing approach provides familiarity along with a level of certainty to the community as to the likely development outcomes anticipated.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect benefits have been identified, noting that cultural and historic heritage values are subject to consideration under a separate chapter of the ODP.</li> </ul>	<p>The operative provisions have largely been in place since 2000, with some amendments largely made through Plan Change 48 in 2013.</p> <p>There is clear information and evidence that confirms that the current provisions:</p> <ul style="list-style-type: none"> <li>Are out of date and not fit for purpose in some respects;</li> <li>Do not give effect to higher order direction; and</li> <li>Are not providing for residential amenity outcomes.</li> </ul> <p>The key risks of maintaining the current approach is that:</p> <ul style="list-style-type: none"> <li>It does meet the NPS-UD direction to provide a well-functioning urban environment;</li> <li>Perverse amenity, quality design, resilience and protection of areas and sites of importance outcomes; and</li> <li>Is likely be found to be an inappropriate and unsupportable approach to meeting Councils higher order statutory requirements.</li> </ul>

<sup>12</sup> Refer to *Wellington District Plan Review – Building Mass Control Provisions – Urban Design Report – Draft (October 2020)*

	<ul style="list-style-type: none"> <li> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Potential economic impact on property values or returns due to inadequate amenity provision or poor quality design.</li> </ul> </li> <li> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>Lack of residential amenity policies and/or standards in the central area has resulted in poor amenity outcomes, particularly inner city residents.</li> </ul> </li> <li> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No direct or indirect costs have been identified, noting that cultural and historic heritage values are subject to consideration under separate chapters of the ODP.</li> </ul> </li> </ul>		
<b>Effectiveness and efficiency</b>	<p><b>Effectiveness</b></p> <p>There is clear information and evidence that confirms that the current provisions are out of date, insufficiently fit for purpose in a number of respects and fail to implement higher order direction. This approach is not the most effective means of enabling a well-functioning urban environment under the NPS-UD direction.</p>	<p><b>Efficiency</b></p> <p>The status quo approach is not efficiently providing for residential amenity, high quality design outcomes or building resilience mechanisms. It is considered that the status quo, relative to the proposed provisions, is not an efficient method of meeting the proposed objectives given the relative costs versus benefits outlined above.</p>	
<b>Overall evaluation</b>	<p>Whilst there are existing policies and measures in the ODP, the status quo is not the best means to achieve a high quality, well-functioning urban environment with the necessary focus on enabling public and private amenity, resilient building design or managing adverse effects. The status quo approach is also an inappropriate and unsupported approach to meeting Councils higher order statutory requirements.</p>		

## 12.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as it:

- Gives effect to all relevant higher order direction and requirements including the RMA and the NPS-UD.
- Aligns with the National Planning Standards.
- Implements the directions in Our City Tomorrow: A Spatial Plan for Wellington City.
- It is based on sound evidence, and has been developed through an extensive consultation process.
- The objectives and policies provide certainty and clear direction regarding the purpose, character and level of amenity anticipated within the zones and precinct, supported by a framework of rules and standards that align with the built development and amenity outcomes sought.
- The benefits of the proposed approach significantly outweigh the costs.

## **Appendix 1: Advice Received from Taranaki Whānui and Ngāti Toa Rangatira**

## **Appendix 2: Feedback on Draft District Plan 2021**

City Centre Zone Extracts – Draft District Plan Consultation

Topic	Submitter	Submission Point No.	Provision	Feedback	Change/s Sought		Proposed Change/s (Note: specific text changes sought are either <u>underlined</u> or struck through)	Response:
Planning Maps	Foodstuffs North Island Ltd	777.11	Planning Maps	<p>Support zoning and permitted supermarket activity for:</p> <ul style="list-style-type: none"> <li>• New World Railway Metro, 2 Bunny Street, Pipitea, 6011</li> <li>• New World Willis Street Metro, 70 Willis Street, Wellington Central, 6011</li> <li>• New World Wellington City, 279 Wakefield Street, Te Aro, 6011</li> <li>• New World Thorndon, 150 Molesworth Street, Thorndon, 6011</li> </ul>			N/A	Support noted. <b>No response needed.</b>
Definitions	Z Energy	1101.20	Definitions	<p>COMMERCIAL ACTIVITY</p> <p>With the absence of a specific objective, policy and/or rule relating to service stations, yard-based retail, or drive-through activities in some chapters of the dDP the retail sale of fuel (including service stations and truck-stops) would need to fall into another activity definition.</p> <p><b>Clarify</b> that in the absence of a specific objective, policy or rule relating to service stations, yard-based retail, or drive-through activities, the retail sale of fuel (including service stations and truck-stops) would fall into the definition of a commercial activity.</p>			Change to 'Commercial Activity' sought or the creation of specific objective, policy and/or rule relating to service stations.	<b>No change.</b> Retention of approach to embedding provisions for other activities within broader activity definitions.
Definitions	Z Energy	1101.21	Definitions	<p>SERVICE STATION</p> <p>The definition is supported and Z assume the definition includes truck stops. <b>Retain</b> the definition of Service Station is currently worded.</p>				Support noted. <b>No response needed.</b>
Definitions	Z Energy	1101.22	Definitions	<p>YARD BASED RETAIL</p> <p>Z Energy is not opposed to the definition of yard based retail. However, given Zs concerns raised above regarding the rules for yard-based retail activities in the Centre zones of the Draft Plan, a revised definition of yard based retail and new rule for new and alterations to service stations could be established in each of the relevant land use zones.</p> <p>This suggested approach is an alternative to the relief sought to Rules CCZ-R14, MCZ- R14 and LCZ-R14. Given that service stations are separately defined, they need not be included in the definition of yard-based retail activities if an appropriate alternative rule framework supported the activity of service stations.</p> <p>Amend the definition of Yard-based retail as follows:</p>			Change to the definition of 'Yard-based retail' is sought, and a new rule is sought in all land use zones that otherwise control yard-based retail.	<b>No change.</b> Retention of current approach which recognises these as a form of yard based retail and Council's policy position is to deter yard based retail in the CCZ and seek efficient use of land consistent with the NPS-UD requirement for intensification and growth in residential accommodation.

				<p>means any retail activity which supplies goods or services primarily from an open or semi-covered yard, and where the yard comprises at least 50% of the total area used for retail activities. This includes but is not limited to:</p> <ul style="list-style-type: none"> <li>• garden centres</li> <li>• <del>service stations</del> ....</li> </ul> <p><b>And ADD a new rule</b> in all land use zones that otherwise control yard-based retail to capture the activity of establishment of new and alterations to existing service stations as a discretionary activity with no requirement for notification.</p>			
<b>General support for general objectives of the Plan</b>	Argosy NO1 Property Ltd	881.1	General	<p>Argosy supports the general objectives of the Draft Plan to the extent described below, and in particular:</p> <p>(a) the recognition of the City Centre as the primary centre serving the wider Wellington region;</p> <p>(b) the creation of well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (NPS-UD)); and</p> <p>(c) the recognition of the need to ensure the CBD is resilient to the risks of natural hazards and coastal hazards.</p>			Support noted. <b>No response needed.</b>
<b>General – Recognise the benefits of existing investment in the CBD</b>	Argosy NO1 Property Ltd	881.1	General	<p>Amendment sought to recognise the benefits of existing investment in the CBD in relation to natural hazards and coastal hazards. ...apply appropriate provisions to reflect the probability and limitations in mitigating risks of liquefaction and tsunamis;... (d) provide consistency in the default activity statuses for activities in the Natural Hazards and Coastal Hazards Overlays;</p> <p>...</p> <p>The Draft Plan should recognise the benefits of existing investment in the CBD in relation to natural hazards and coastal hazards</p> <p>6.5 The strategic direction of the Draft Plan recognises that the CBD is the primary centre for the Wellington region and is a significant hub of commercial and community activities. However, the Natural Hazards and Coastal Hazards Overlays fail to take into account the existing significant investment and built development in the CBD and necessity for the CBD to continue to develop over time.</p> <p>6.6 The Draft Plan recognises that the port, airport and rail activities are excluded from the hazard classification system in recognition of the social and economic benefits that these activities have and that their position in the city is largely fixed.</p> <p>6.7 The economic and social benefits of the significant existing investment in the Wellington CBD should also be recognised. As we respond and adapt to climate change and other hazard risks decisions will be made on where we retreat and what is protected. That these decisions still need to be made is not recognised in the Draft Plan.</p>		Changes sought to natural hazards chapter and coastal environment chapter to recognise and provide for the existing significant investment in the CBD.	<b>No change.</b> Activities in the City Centre are still enabled and are a different consideration when compared to the Airport, Port etc. These are lifeline facilities that must be enabled no matter what. The approach to natural hazards in the CCZ is to reduce risk to life and property and ensure new buildings are resilient.

				<p>6.8 Retreat from the Wellington CBD is unlikely to occur, and therefore it would be more appropriate for the Draft Plan to anticipate a protection or adaptation approach to climate change hazards.</p> <p>6.9 Land owners in the CBD are generally aware of the risks of natural hazards and are already subject to pressure to take steps to ensure their properties are as resilient as possible. It is not appropriate for the Draft Plan to apply an objective, policy and rule framework that is overly precautionary and not practical.</p> <p>...</p> <p>Our comments on the existing significant investment in the CBD made in relation to Natural Hazards chapter also apply to the Coastal Environment chapter.</p>			
<b>General – Character overlay</b>	WCC Environmental Reference Group	979.3	N/A	<p>Mount Victoria:</p> <ul style="list-style-type: none"> <li>The edge of Kent Terrace should be zoned Mount Victoria Medium Density Residential Zone, not City Centre. This means that high-rise buildings can be built on Cambridge Terrace, and buildings adjacent to Kent Terrace will be slightly lower, which provides a more nuanced edge to the city, rather than a sudden change. It also protects the degree of sunlight available to the character areas of Moir Street, etc.</li> </ul>		<ul style="list-style-type: none"> <li>Re-zone the edge of Kent Terrace to MDRZ not CCZ.</li> </ul>	<b>No change.</b> CCZ for Kent Terrace is to be retained, as it is in the Operative District Plan. Kent Terrace is more fitting with CCZ zoning and activities than the now High Density Residential Zone. Already under the Draft Plan the heights have been stepped down from 42.5m in Te Aro to 28.5m on Kent Terrace. So there is a reduction of height from higher Te Aro heights.
<b>General support for Centres Zone provisions</b>	Ministry of Education Te Tahuu o Te Matauranga	1129.1	General	The Ministry supports these provisions as it is important to recognise and provide for social infrastructure (such as schools) which will service the surrounding residential catchments and other community/commercial activities. The Ministry considers the permitted activity standards for education facilities and the assessment criteria for non-compliance with those standards and the flow-on activity status to be acceptable.			Support noted. <b>No response needed.</b>
<b>General – Allowing height exceedances</b>	Darko Petrovic	18.1	City Outcomes Contribution	<p>As a replacement for the current plan I support the new district plan in particular as it will create a more active development environment in Wellington City without unnecessary, restrictive regulation. In order to ensure that a higher densification of the central area will occur, the city council should make it easier for developers to construct buildings that exceed height limits if required. This will provide a higher concentration of dwellings in a single building and with a controlled, modern and environmentally friendly design this would add to the liveability and design appeal of the Central Area.</p> <p>I am aware that the Design Guide (Centres &amp; Mixed Use) allows for this so it would be great to see the council utilising this in future to allow for higher building construction in the central area despite unlimited heights not being adopted.</p> <p>Current earthquake strengthening standards allow for this with the use of base isolation.</p>		Notes that the city council should make it easier for developers to construct buildings that exceed height limits if required. Also acknowledged that the Design Guide already does this.	Support noted and acknowledgement that the City Outcomes Contribution enables developers to exceed height limits if city outcome contributions are made. <b>No response needed.</b>



<p><b>General – costs of development</b></p>	<p>Stratum Management Ltd – Craig Stewart</p>	<p>1115.14</p>	<p>General</p>	<p>Summary</p> <p>Stratum concerns centre around the potential for increased costs stemming from the District Plan. Based on a typical apartment building of 120 units, the following costs can be ascribed from some of the standards and guidelines being considered:</p> <ul style="list-style-type: none"> <li>• Private outdoor space: \$10M</li> <li>• Communal outdoor area: \$2M</li> <li>• Bike storage: \$7.5M</li> <li>• Assisted Housing Financial Contribution: \$1.6M based on an \$SOM building value.</li> </ul> <p>These are very real costs that impact on the viability of built development.</p>		<p>Concerns raised re costs of the new standards and the impact on the viability of built development.</p>	<p>Council commissioned The Property Group to undertake a ‘Proposed Amenity and Design Provisions – Cost Benefit Analysis Report (June 2022)’ to assess the benefits and costs of the proposed amenity provisions in the City Centre and Medium Density Residential Zone based on the Draft District Plan provisions.</p> <p>The report assessed the new CCZ zone standards using case studies on a range of sites across the CCZ in terms of direct impact on development costs and what this means for development feasibility. Costs to the economy included increased direct cost of housing per household in terms of loss of rental income, increased costs for households unable to occupy future units due to reduced yield and impact on agglomeration benefits i.e. risk of residents having to live further away.</p> <p>This report also considered the value increased residential amenity has on a development and its contribution to the revenues that can be generated. It found that a high standard of development with good amenity would also support a higher price point achievable for each apartment.</p> <p>In terms of benefits, the assessment demonstrates that providing a residential development with a high level of amenity is not only linked to health and wellbeing benefits for residents directly, but it also contributes to broader community, environmental and urban character benefits. Benefits to solar access, provision of open space, privacy, outlook, more functional living spaces and broader benefits such as reduced carbon emissions from less car use.</p> <p><u>The analysis demonstrates that in most cases where the amenity</u></p>
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							<p><u>provisions have been applied the development remains profitable.</u></p> <p>This report also considered the value increased residential amenity has on a development and its contribution to the revenues that can be generated. <u>It found that a high standard of development with good amenity would also support a higher price point achievable for each apartment.</u></p> <p><u>The report also highlights a number of challenges facing the construction sector which are outside the scope and control of the District Plan.</u></p> <p>The report recommended Council review the current street edge height control, depth and internal setback standards. <b>Some changes made.</b> Council has made the following changes:</p> <ul style="list-style-type: none"> <li>Deleted the Street Edge Height Control.</li> <li>Increased the depth standard parameters from 20m to 25m to allow more development.</li> <li>Reduced the site setback standard from 10m to 8m, increasing development capacity.</li> </ul>
<b>General – Residential developments</b>	Property Council	686.1	N/A	9.3 The Draft District Plan also looks to set new standards for residential developments to ensure that new apartments and townhouses are pleasant places to live in. We support this inclusion and encourage the Council to work with the sector to ensure that these are workable.			Support noted. <b>No response needed.</b>
<b>General – Parking</b>	Amber Smith	771	N/A	<p>Parking:</p> <p>The pedestrianisation of the CBD and an increase in residential spaces in the CBD will have an impact on the accessibility for parking. I believe this is the right move forward and applaud councillors for getting behind this type of policy. I hope they will take into account that cars are the least efficient mode of transportation and a reprioritisation of these vehicles will only be beneficial for our inner city. I believe emphasis should be placed on electric vehicles and given the district plan dictates the eligibility for residents permits a move to make radical change to the eligibility of these permits is necessary to change driver behaviours and encourage the use of public transport and impact the viability of owning more than one vehicle in the fringe suburbs. Not only will this positively impact urbanisation and make our streets more accessible to foot</p>			Support noted. <b>No response needed.</b>

				traffic it make a huge impact to reduce our emissions as a city and put climate change at the forefront of our city planning.			
<b>Climate change and concentrating growth in the CCZ</b>	Bruce White	1088.1	General	Climate change is another. It appears that this is taken by some as making it essential that city growth be concentrated close to the city centre (to assist with reducing transport emissions). But this view appears to have little regard for what seems to be a phasing out of hydro-carbon fuelled vehicles, in favour of electric (and/or possibly hydrogen-fuelled) vehicles, a transition that is already well underway. Assuming this trend continues, it is far from self-evident that intensification close to the city centre is necessary for achieving transport emission reduction objectives.			Support noted. <b>No response needed or changes made.</b>
<b>Climate change</b>	Wellington Chamber of Commerce - Joe Pagani	1111.1	General	Also concerning, are discussions from the Council to remove parking and access to the central city for cars – including electric vehicles. This will make it harder for shops in the city centre to get customers and slow the EV transition – particularly for lower income Wellingtonians.			Concerns raised re removal of parking in the central city.  Concern noted. <b>No change.</b> Council considers its carparking approach aligns with NPS-UD direction.
<b>General – Aotea Fault Risk to Kent Tce, Cambridge Tce, Hania St and Moir St</b>	Tracey Paterson	29.1	N/A	<p>Aotea Fault</p> <p>It is my understanding that geological investigations by NIWA Scientists over recent years have confirmed that the Aotea fault line runs from harbour, ashore at Chaffers, past Waitangi Park and down Kent Tce.</p> <p>In particular, I reference a paper, by Master of Science student Alistair Stronach and Professor Tim Stern from Te Herenga Waka – Victoria University of Wellington.</p> <p>The main issue identified is that it showed that the thickness of soft sediments beneath Wellington city is up to two times greater than previously thought. This sediment information is available in particular for the Kent Tce &amp; Cambridge Tce, Hania St and Moir St areas.</p> <p>When earthquake waves passed through layers of sediment – as opposed to basement rock – they increased in intensity and led to more shaking. The makeup of the ground beneath Kent Terrace, could be putting the city at an increased risk of destructive shaking during an earthquake. We saw extensive evidence of this during the Kaikoura earthquake. We would not want the district plan to facilitate this to be repeated.</p>			Recognition of the Aotea fault sought and a re-think about enabling development in particular for Kent Tce, Cambridge Tce, Hania St and Moir St.  <b>No change made</b> to height controls in the City Centre for this area. Council has used the latest data and modelling from GNS and NIWA and has mapped the Ohariu, Shappard Gully, Terawhiti and Wellington Faults. The rule framework in the Natural Hazard chapters applies a risk based approach.
<b>General – Affordable housing in Te Aro and WCC focus</b>	Matthew Plummer	403.1	N/A	<p>My submission is made in a personal capacity, and as someone who has enjoyed living in an apartment in Te Aro and a warm, dry 1900s house in Mount Cook. I walk, bike and skateboard around town – and I don't have a drivers licence – so I know how important it is to incentivise high quality lifestyles in our central city that enable 'active transport'.</p> <p>Affordable housing will be delivered by Council focusing on our 'brownfield' inner-city sites. A failure to do this will mean Wellington will not be able to attract the young professionals our businesses need to drive growth; or support those on low incomes who need to live centrally to reduce transport costs and pay an affordable rent.</p> <p>I would like to see the City Council focus on the development of land at the top of Te Aro (Taranaki Street and Tory Street) as well land along Kent and Cambridge Terraces, and Adelaide Road. This could be incentivised by streamlining the City Council's development red-tape, and by the City Council helping turn unappealing spaces into attractive neighbourhoods –</p>			<ul style="list-style-type: none"> <li>• Supports affordable housing.</li> <li>• Seeks that Council focus on enabling development along Taranaki Street, Tory Street, Kent and Cambridge Terraces, and Adelaide Road.</li> <li>• Wants small unit sizes removed in inner suburbs and character protection returned.</li> </ul> <p><b>No change made.</b> Under the Spatial Plan direction and District Plan heights enabled in Te Aro, as well as rezoning Adelaide Road to City Centre, Council has already signalled it anticipates growth in Te Aro and along future MRT routes. Councillor decisions on the Proposed District Plan sign-off removed the Assisted Housing chapter but assisted housing is still an output sought under the City Outcomes Contribution mechanism in the City Centre and other zones.</p>

				<p>this was previously done in 2014/15 on Victoria Street, where the increase in three waters capacity and mini-parks unlocked major residential developments by developers Willis Bond and Stratum.</p> <p>Adelaide Road, in particular, has the potential to be a new inner city suburb – with high density housing built on solid ground and a lack of neighbouring residential owners allowing a genuinely ambitious approach to creating an exciting, vibrant new residential quarter. Proximity to the city centre means minimal car-parking would be required, but with great cycle infrastructure laid on by the City Council.</p> <p>These sites are better able to support low-carbon, affordable, quality residential options so desperately needed by younger Wellingtonians.</p> <p>I am concerned that the focus on intensifying Wellington’s inner-city suburbs is seen as a panacea for the shortage of housing.</p> <p>Small unit sizes, cost of land, lack of capacity in infrastructure and topography means the proposed changes will not deliver affordable housing, particularly of the kind required by graduates and young professionals.</p> <p>By way of example, a character house on Wallace Street (Mount Cook) was demolished a couple of years ago and replaced with four townhouses. These were thoughtfully designed and integrate well with the surrounding buildings, and replaced a house that had suffered decades of neglect – but they are now valued at well over \$1.1m each, so clearly this type of development isn’t going to be ‘affordable’.</p> <p>In line with this, I also support the submission by ‘Keep Wellington’s Character’ – it is shortsighted to demolish family homes and replace them with smaller residential units; moreover we must keep our focus on developing the car yards and low grade commercial units that are dotted around the inner city if we are to make Wellington an affordable place to live.</p> <p>Much of Wellington’s ‘character’ inner city suburbs are already ‘medium density’. Conversely the City Council has permitted developments on Taranaki Street and Willis / Victoria Street that are in some cases only two storeys high: far from the high density housing that should have been built in such central locations.</p> <p>I am also concerned that growth in Wellington’s tertiary sector has been driven with little thought to where the students will live. Too many of Wellington’s family homes have students living in them, with a lack of student accommodation closer to our major tertiary campuses. Wellington needs more ‘Halls of Residence’ in Te Aro so student budgets aren’t gobbled up by bus fares and heating bills for young people living some distance from their campuses in perfectly decent houses that should be enjoyed by families.</p>			
<b>General – Population Diversity</b>	Inner City Wellington (ICW) – voice of Te Aro and Wellington Central	450.1	N/A	<p>ICW has consistently expressed our concern about the quality of the lived environment being delivered in the current intensification of residential building, both through conversions and new builds.</p> <p>ICW believes that a diverse population living in a healthy mixed neighbourhood will provide the best environment for business to succeed in the Inner City. Housing Development must foster that and not allow degradation of the area through domination of high-density rental properties that promote a suburb of poverty.</p>		<ul style="list-style-type: none"> <li>• Largely supports Draft Plan direction.</li> <li>• Seeks that a regulated maximum population density per hectare for a mesh block is established.</li> </ul>	<b>No change.</b> Council does not have the imperative to have a maximum density control. No work, analysis etc. has been done to support or rationalise a density control.

				<p>Te Aro and Wellington Central are expected to accommodate an additional 14,148 people which we are told will require around 6200 new dwellings (which equates to 2.28 persons per dwelling). Assuming apartment buildings of 100 units (i.e. average 2 persons per unit) we would need an additional 70 high rise buildings. Again, we express our concern that spatial issues are being considered without being driven by demographics of the communities we want to develop in them.</p> <ul style="list-style-type: none"> <li>ICW SUBMITS that a regulated maximum population density per hectare for a mesh block is essential so that monitoring could ensure consent is not given to any new build or conversion that would result in that maximum being exceeded.</li> </ul> <p>ICW is committed to the UN Sustainable Development Goals, and we fully endorse the Human Rights Commission views on the 'The human right to adequate housing in New Zealand'.</p> <ul style="list-style-type: none"> <li>ICW MAINTAINS that the current wave of inner-city residential development is not delivering the socially, economically, and generationally diverse residential communities that are the hallmark of successful residential urban neighbourhoods across the world.</li> </ul>			
<b>General – Introduction and fact sheet</b>	The Property Council	686.1	N/A	<p>8.1 With an expected 50,000-80,000 more people over the next 30 years, we support the Draft District Plan's proposal to encourage more inner city living, greater density of urban form, and more efficient use of sites within the City Centre. We note that the District Plan Fact Sheet City Centre states "We also want to continue to have a vibrant City Centre to live, work and play in." It is important to note that the words "shop" is missing, and we encourage its incorporation to ensure ongoing commercial activity within the City Centre.</p>		Change sought to City Centre fact sheet not chapter.	<b>No change.</b> This relates to the fact sheet not the chapter.
<b>General – Wind, Minimum Height</b>	The Property Council	686.1	Wind provisions and CCZ-S5	<p>8.2 The Draft District Plan recommends retaining the current building height limits in most areas, while increasing heights in Te Aro and along a portion of Adelaide Road. Although supportive, we are concerned that there are some adverse outcomes that would need to be resolved within the draft. Proposing minimum building heights that sit above the 20 metre City Centre wind test threshold could have adverse effects for development within the City. For example, a minimum building height of 21.5 metres in Te Aro would mean all future developments would have to undertake a wind test which costs around \$20,000 - \$25,000 and adds approximately six to nine months to a project. We recommend increasing the wind test requirements to allow for a buffer in addition to the newly proposed minimum building heights. Increasing the wind test level will likely encourage more large-scale developments in Wellington and would also simplify the Council's and applicant's overall development process.</p>		Change sought to the Wind chapter to reconcile the height trigger in the wind chapter with the minimum building height.	<p><b>No change.</b> Wind experts have advised that their recommendation for the trigger for the City Centre Zone stay at 20 metres (as per the Draft District Plan).</p> <p>The rationale for this is that isolated buildings can generate significant wind effects above 20m, and this height provides a reasonable balance between avoiding unnecessary cost (of formally assessing wind effects) and allowing badly performing buildings (less than the trigger height that never-the-less cause significant deterioration in wind conditions).</p> <p>The updated Wind Best Practice Guidelines will encourage designers to consider wind effects, but the wind trigger is the "hook" that compels designers to think about wind effects. It is important to remember that a wind tunnel test is not always required if a planner considers a</p>

								development will have minimal effects on wind conditions.
<b>General – Encouraging Building Conversions</b>	Su-Wuen Ong	813.1	CCZ-S5	9. City Centre - Agree about the 6 storey minimum to have a compact and sustainable city. As part of that, maybe you should actively encourage more building or conversion to apartments of all sizes and costs. You should do more active than just "discouraging" ground-level parking. Doing more will appear the mode change to active forms of transportation.			Stricter wording required for CCZ-P2.3.	<b>No change.</b> The policy and rule framework are clear that ground floor parking is not a sought outcome City Centre Zone. Council already has new strong objectives and policies that speak to efficient utilisation of land and accommodating growth but deterring vacant sites and ground floor carparking use. As well as a minimum building height.
<b>General – Sequenced Development</b>	Jane Szentivanyi and Ben Briggs	Jane Szentivanyi and Ben Briggs	N/A	<p>Sequenced development</p> <p>We submit that the District Plan needs to set out a clear sequence for intensification, and use zoning appropriately to achieve this, rather than upzoning broad areas of land; in particular we submit that:</p> <ul style="list-style-type: none"> <li>• this sequence ought to focus first on major areas of underutilised land and smaller groups of underutilised sites close to public transport;</li> <li>• the next priority ought to be land identified for intensification through community-planning processes which also aligns with infrastructure and transport investments;</li> <li>• this sequencing needs to be clearly aligned with infrastructure investment to provide certainty, avoid unintended consequences with insufficient infrastructure and avoid dispersing Council efforts across the whole city;</li> <li>• Council needs to make full use of all methods available to support faster, high quality development on these sites and to explicitly identify these methods and the expected results in the draft District Plan.</li> <li>• Council needs to make full use of the qualifying matters provisions in the NPS-UD in order to better locate and sequence land for intensification.</li> </ul> <p>The length of Cambridge Terrace, the south end of Taranaki Street and the northern end of Adelaide Road are clear examples of a major brownfields sites suitable out for a masterplan coupled with a collaborative approach to development to ensure appropriate orientation and alignment of individual developments. Coordination rather than simply including these areas in the CCZ is needed to ensure great urban design outcomes in terms of sunlight, building design and greenspace.</p> <p>We submit that the draft District Plan ought to be amended to reflect this approach for Cambridge Terrace Taranaki Street and Adelaide Rd.</p> <p>Other examples of underutilised land can be found in Abel Smith St east of Victoria St and undeveloped "air space" along Thorndon Quay - adjacent to and north of the Railway Station yards.</p>			Seek sequenced development of parts of Te Aro and Adelaide Road.	<p><b>No change.</b> The intent of the Spatial Plan was to provide equitable, serviced growth distribution across the city. Adelaide Rd and Te Aro has been signalled as intending to accommodate more growth through increased heights and rezoning Adelaide Road to City Centre.</p> <p>The District Plan already seeks great urban design outcomes re sunlight, building design and greenspace via policies, standards and design guides.</p> <p>There is a stronger policy direction on the more efficient utilisation of City Centre land and follow-up action points from the Spatial Plan.</p>
<b>General – Sequenced Development</b>	Jane O'Loughlin	1109.1	General	Ø I submit that the implementation of the spatial plan agreed in June 2021 should be done in stages, as indicated in the spatial plan itself. This means that the areas upzoned for medium density development should be the central city (including Te Aro and Adelaide Rd), Newtown,				<b>No change.</b> The intent of the Spatial Plan was to provide equitable, serviced growth distribution across

				<p>Johnsonville and Tawa. Other inner city suburbs should (largely*) remain zoned as residential, but earmarked for future development in the longer term.</p> <p>*there are fringes of these suburbs that are clearly ripe for development and can be zoned medium density – in Mt Victoria, this includes the Home and Hania street area.</p>			<p>the city. Adelaide Rd and Te Aro has been signalled as intending to accommodate more growth through increased heights and rezoning Adelaide Road to City Centre.</p> <p>The District Plan already seeks great urban design outcomes re sunlight, building design and greenspace via policies, standards and design guides.</p> <p>There is a stronger policy direction on the more efficient utilisation of City Centre land and follow-up action points from the Spatial Plan.</p>
<b>General – Tensions between service stations and zoning</b>	Z Energy	1101.1	General	<p>Z Energy owns and operates retail fuel facilities (service station as defined in the dDP, which we have interpreted as also including truck stops) in the CCZ on Taranaki and Vivian Streets.</p> <p>The CCZ is considered appropriate in a wider sense but there is an inherent tension between service stations and zonings that are pedestrian and streetscape orientated. Service stations are by nature vehicle orientated and whilst these developments can be attractive, they have operational requirements which mean that they do not conform to traditional “streetscape” standards (eg: provision of verandahs and building to the front boundary). This is reflected in the specific comments in relation to policies and rules below. In addition, Z seeks clarity that service stations are considered under the broader term ‘commercial activities’, except where service stations are specifically referenced (such as in the ‘Yard-based retail activity’ definition).</p>		Clarity sought regarding how service stations are considered in the plan definitions.	<b>No change.</b> Service stations fall under the definition of ‘yard based retail activities’ which is a sub-set of commercial activities.
<b>Suggestion to reduce the size of the CCZ to recognise the surplus of low grade office accommodation within in it, and brownfields sites</b>	DJ Cranko	1038.1	Zoning changes	<p>I suggest reducing the size of the city centre zone to recognise the surplus of low grade office accommodation within in it, and brownfields sites. This building stock can and is being re-purposed as residential, which is a more sustainable approach to building. Fewer high rise buildings (more than eight storey) need to be built in the city. The inner city is already the largest residential suburb in Wellington as result of demographic changes such as baby-boomers releasing their suburban properties (in outer residential suburbs) to live in apartments, the rise of working-from-home due to COVID and GIG and agile work/life patterns .</p> <p>The Council’s own planning assessment work also confirms that there is sufficient quality residential development in the existing outer residential areas that to sustain the protection of these inner-city areas -as a qualifying matter under the National Policy Statement-Urban Development.</p>		Reduction in City Centre Zone site.	<b>No change.</b> The City Centre Zone allows residential development and conversion from office space to residential use. So there is no valid reason to re-zoning this area to residential.
<b>Accessibility</b>	VicLabour	1056	General	<p>We want to see accessibility be a consistent principle throughout the district plan, including in central city design, as it is important that the central city can be enjoyed and utilised by all of us.</p> <p>Noting the suggestion that buildings on narrow streets be constrained by this fact, we emphasise that narrow streets provide an opportunity to promote active and public transport as the primary means of transport, with accessibility for disabled people, emergency services, and</p>		Seeks that it is made clearer in the District Plan that narrow streets provide an opportunity to promote active and public transport.	<b>No change.</b> The benefits of narrow streets to active and public transport are acknowledged. However, no change is made as it is believed that

				any other important considerations being much more important than concerns about personal vehicle use.			this is adequately covered by the Transport Chapter and Design Guide.
<b>General – the future of Te Aro</b>	Guy Marriage	829	General	The future of Te Aro is once again to be what it once was: a desirable residential area for a mixture of people, including workers, retirees, families, students, and visitors. As such, housing provided in Te Aro must be good quality and will be multi-unit, medium density by nature. The present situation of mixed residential / light commercial will likely change to primarily residential, and the City must ensure that the general area supports and enhances residential amenities. This means providing quality green spaces, sunlight in streets, reduced traffic volumes, enhanced pedestrian environments, control of noise and other pollution.			Seeks that the District Plan enhances residential amenities. <b>No change.</b> Submission aspirations are acknowledged. However, this is already supported by the District Plan and Design Guides.
<b>General – Residential growth in Centres</b>	Wellington City Youth Council	1123.1	General	28. Youth council is also in huge favor of enabling more residential development in centres as it will set better and new standards for new apartments and townhouses to be built and to live in.			<b>No change.</b> Support noted. No response needed
<b>General – Demand for Housing</b>	Kainga Ora	1126	General	In terms of its role as a public landlord, there has been a marked change in the type of housing that is required by Kainga Ora's tenant base:  a) Demand in particular for the Wellington City area has increased for apartments, terraced housing and for single and 2 bedroom housing required for single persons/couples. Currently the demand for a 1 bedroom typology sits at 62% of the waiting list total. The demand for a 2 bedroom typology sits at 22% of the waiting list total.  b) As a result, the size of many public houses does not match the changing demand for public housing, with a large proportion of the Kāinga Ora's current housing typologies comprising of 3-4 bedroom homes on large lots; this can be too large for smaller households and potentially considered not fit for purpose for some tenants.			<b>No change.</b> Feedback noted re demand for different unit types. The City Centre Zone's policy CCZ-P4 speaks to enabling a range of housing type, price, size and tenure accessible to all.
<b>Removing Maximum Building Heights</b>	Kainga Ora	1126	CCZ-S1	Remove height controls across the City Centre zone and simplify and increase the height controls across the Commercial and Mixed Use Zones;			<b>No change.</b> Submitters' request for removing maximum height limit is acknowledged. The Councillors in their decisions on the final spatial plan made the decision to retain maximum building height limits.
<b>Removing Maximum Building Heights</b>	Terence Priggen	551.1	CCZ-S1	Remove the maximum height restrictions in the central city.			Currently there is significant under development in the City Centre, in that developers are largely not building to (or extending beyond) the Operative Draft District Plan or Draft District Plan heights. Internal analysis shows the difference between Draft District Plan Height control and the buildings actual heights.
<b>Removing Maximum Building Heights</b>	VicLabour	1056.1	CCZ-S1	We are pleased by the proposal for a minimum building height, but are disappointed by the imposition of upper height limits, against the advice of officials. The concerns about the various potential effects and risks of very high buildings can and should be managed in design requirements and consent processes. All around the world, cities build up in innovative ways to support booming cities and this restriction imposes an unnecessary restriction on our city's development and may contribute to a more sprawled out intensification. We recommend the removal of height limits in CCZ-S1.			There has been much stronger policy intent in the Draft District Plan showing that Council and the CCZ
<b>Removing Maximum Building Heights</b>	A City for People	1076	CCZ-S1	Remove height limits in City Centre per NPS-UD  We believe Council's decision on the final Spatial Plan to restore height limits in the City Centre was a mistake, and inconsistent with the NPS-UD. Removing height limits allows us to continue growing as a compact city, with housing adjacent to work, transport and amenities. Councillors			



				<p>raised a number of concerns about design, reflection, and other factors, but these can all be worked out through the resource consenting process and through Design Guides. We should be enabling architects to be creative, and design beautiful buildings that provide urban living for thousands, instead of closing the door and imposing rules that hold us back as a 21st century capital city.</p> <p>Placing height limits on the city centre is also inconsistent with Policy 3(a) of the NPS-UD, which requires District Plans to enable “building heights and density of urban form to realise as much development capacity as possible” in city centre zones.</p> <p>We also recognise that sightlines to maunga can be significant for Māori, so we support retaining viewshafts that are important for mana whenua.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>• Remove height limits in the City Centre zone to be compliant with the NPS-UD</li> <li>• Retain viewshafts significant to mana whenua</li> </ul>			<p>are a lot more enabling of growth and greater intensification in the CCZ and the outcomes we expect are clearer. Both in the policy and rule framework. This aligns with the intent of the NPS-UD.</p> <p>Having unlimited heights would compromise the City Outcome Contribution mechanism as it would mean developers can build to any height with no city outcome benefit being achieved. This mechanism allows for taller buildings which exceed the maximum building height but achieves a greater public good outcome through the process.</p>
<b>Removing Maximum Building Heights</b>	A City for People - SamKate Douglass, Aaron Tily, Chad Wappes, Tony Cairns, Alexander Savchuk, Megan Salole, Janet Caroline Williams, Jean Sergent-Shadbolt, Ralf Schwate, Tegan van der Peet, Hayley Jones, Alexis Crockett, Peter Cockrem, Isabella Cawthorn, Parents for Climate Aotearoa - Alicia Hall	63.1, 65.1, 235.1, 240.1, 244.1, 246.1, 359.1, 699.1, 788.2, 927.1, 960, 1033.1, 952.1, 346.1	CCZ-S1	I support removing maximum height limits in the City Centre Zone to enable more housing in a compact city centre, and to comply with the National Policy Statement on Urban Development.			
<b>Removing Maximum Building Heights</b>	Peter Cockrem	1033.1		Remove maximum height limits in the City Centre Zone - it doesn't really make a difference to anyone whether a building is 12 storeys or 50 storeys so we may as well enable more homes and jobs where there is the lowest additional need for transport infrastructure - most trips can be made by walking.			
<b>Removing Maximum Building Heights</b>	VUWSA – Grace Carr	862.2	CCZ-S1	The council must implement the height limits, character precincts, and other aspects agreed to in the Spatial Plan, except where not consistent with the NPS-UD. We believe the District Plan needs to focus on how to implement the Spatial Plan as opposed to changing what was agreed to. However, we believe that the District Plan needs to remove height limits in the City Centre as			

				<p>this is inconsistent with the NPS-UD. This will allow for more growth that is adjacent to supporting infrastructure such as transport, amenities etc.</p> <p>The status quo of housing typologies does not serve the diverse needs of our communities. The District Plan has the opportunity to change this and enable different types of housing that better reflects the desires of the community, especially housing such as: townhouses, co-housing, papakāinga, block housing and more.</p>			
<b>Removing Maximum Building Heights</b>	Peter Cockram	1033.1	CCZ-S1	Remove maximum height limits in the City Centre Zone - it doesn't really make a difference to anyone whether a building is 12 storeys or 50 storeys so we may as well enable more homes and jobs where there is the lowest additional need for transport infrastructure - most trips can be made by walking.			
<b>Rezone properties on the West side of Willis St between Aro St and Abel Smith St</b>	Aro Valley Community Council Incorporated - AVCCI	1133.6	Zoning of Willis St properties	<p>There are a number of specific boundary issues and omissions in the draft District Plan which ought to be remedied before a proposed Plan is released.</p> <p>Reclassify the sites on the west side of Willis Street between Aro Street and Abel Smith Street from City Centre zone to Aro Valley medium density residential. These sites are only included in the City Centre zone due to an historical mapping error repeatedly acknowledged but unaddressed by WCC. In essence this area was covered by the 1960s designation for the Te Aro motorway, but when that designation was removed the boundary was not adjusted. Ten storeys over 100% of the site is not appropriate for this location. These sites would still be zoned up to six storeys once rezoned.</p>		Rezone specific sites from City Centre Zone to Medium Density Zone.	<p><b>No change.</b> Whilst these sites are no longer included in the Te Aro motorway designation, there is justification for retaining them in the City Centre Zone.</p> <p>This includes the fact that the CCZ has an adjacent character control recession plane which will manage height adjacent to these character precinct sites. It is the same control as the Medium Density Residential Zone standard.</p> <p>Additionally, there is a mix of uses within these sites including the Lychgate funeral home, multi-storey flats, stand-alone dwellings and retail shops. The wider area (on the City Centre edge) is of mixed-use and has seen more dense development recently. It would be optimal to retain City Centre zoning.</p>
<b>Selwyn Street CCZ Zoning concerns</b>	The Trustees of the Eldin Family Trust - Sir Douglas John White	589.1	Zoning of Selwyn Street	<p>The first section of this letter relates to the changes proposed to properties in Selwyn Terrace, Thorndon. The second section contains matters which are specific to 9 Selwyn Terrace.</p> <p>Opposition to proposed changes to Selwyn Terrace</p> <p>- In relation to Selwyn Terrace, the Spatial Plan proposes to:</p> <p>a) Change the zoning of Selwyn Terrace from Inner Residential to Central Area;</p> <p>b) Impose a minimum building height of 6 storeys on new buildings in the Central Area (no maximum building height is provided); and</p>		Submission seeks that Selwyn is re-zoned back to a residential zoning from City Centre Zoning.	<p><b>No change.</b> Whilst the majority of properties on the western and north-western edge of Selwyn Terrace are residential in nature, there are a mixture of uses along the eastern portion of Selwyn Terrace and the surrounding area more widely. This includes the British High Commission, The Catholic Institute of Aotearoa NZ, and St Mary's College.</p> <p>The height limit for Selwyn Terrace and the surrounding area is 27m</p>

			<p>c) Remove the Pre-1930 Character Area overlay from Selwyn Terrace. This would remove the current restriction on demolition in this area.</p> <p>- I consider it is appropriate to maintain an Inner Residential zoning to suit the primary use of Selwyn Terrace, rather than change the zoning to Central Area. I also ask that the Pre-1930 Character overlay is retained and that Selwyn Terrace be a sub area within the overlay (which would limit the height of new buildings to three storeys).</p> <p>- In summary, this is because:</p> <p>a) Apart from the British High Commission, all of the buildings in Selwyn Terrace have a residential land use;</p> <p>b) The area is a reminder of the original extent of the residential suburb of Thorndon, prior to construction of the Wellington motorway. Some of the properties lost land to construction of the motorway, making the remaining historic residential character all the more valuable;</p> <p>c) The heritage values and character of the area are significant. The National Policy Statement on Urban Development 2020 ('NPS-UD') permits local authorities to over-ride the general direction for a 6 storey minimum in their district plans if this is necessary to protect historic heritage; and</p> <p>d) The narrow access to the properties on Selwyn Terrace also makes them unsuitable for large developments as proposed by the Spatial Plan.</p> <p>Character of Selwyn Terrace</p> <p>- The NPS-UD allows Councils to modify the requirement for a minimum of 6 storeys to 'accommodate a qualifying matter'.(1) WCC correctly recognises, as shown in the Spatial Plan, that continued protection of pre-1930s character is a qualifying matter under the NPS-UD.</p> <p>- Selwyn Terrace has local and regional significant heritage values which should be enhanced and preserved rather than destroyed. Selwyn Terrace is a unique area of Wellington, being a surviving island of residential character surrounded by largely ecclesiastical, educational, diplomatic and government land uses. It has significant pre-1930s character, especially for the houses in Selwyn Terrace itself. It is disappointing to see the WCC proposing to undermine these values by removing the Pre-1930 Character Area overlay which currently exists in the Wellington City District Plan.</p> <p>- In 2019 the WCC commissioned a report on pre-1930s character by the consultancy firm Boffa Miskell. This report found that the character of Selwyn Terrace is still largely intact and coherent (with the exception of some properties fronting Hill Street).(2) Selwyn Terrace's character is predominantly seen from within the Street itself, rather than from Hill Street, highlighting the exclusive nature of its character.</p> <p>- In the view of Boffa Miskell, the majority of properties in Selwyn Terrace have a 'Primary' level of character contribution which means they have attributes that define the character of the area.</p> <p>Properties in Selwyn Terrace with this level of character are 9, 11, 19, 20, 21 and 22.(3)</p> <p>- To Boffa Miskell's list of properties in this category should be added the properties at 15, 16, 17 and 18 Selwyn Terrace all of which still have their original houses built in the 19th century.(4)</p>			<p>(roughly 8 stories). This is only an extra 7m from what would be allowed under the High-Density Residential Zone alternative for this site.</p>
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			<ul style="list-style-type: none"> <li>- Boffa Miskell also consider that some of the properties in Selwyn Terrace have a 'Contributory' level of character which means they have attributes that support the character of the area. Properties in Selwyn Terrace with this level of character are: 14, 15 and 17.(5)</li> <li>- The majority of the houses in Selwyn Terrace were built before 1930 and display a range of architectural styles.(6) The Boffa Miskell report noted that Selwyn Terrace has "steep topography and a diversity of building types".(7)</li> <li>- The existing character of the area, particularly the height of the existing houses, supports recognition of the important nearby land uses. Even though the area is elevated, the comparatively low height of the buildings ensures that the prominence of the government buildings is not reduced, including in views from lower elevations (such as from the Old Government Buildings or the waterfront).</li> <li>- In summary, the special pre-1930s character of the majority of the houses in Selwyn Terrace has been recognised by the community and expert reports. This character should continue to be recognised and protected.</li> </ul> <p>History of 9 Selwyn Terrace</p> <ul style="list-style-type: none"> <li>- The property at 9 Selwyn Terrace has been in my family for nearly 100 years. My grandfather Charles White purchased the vacant section at 9 Selwyn Terrace in 1922.</li> <li>- 9 Selwyn Terrace is an excellent example of the work of one of Wellington's pre-eminent architects of the 20th century, William Gray Young. Gray Young was engaged by my grandfather to design the two storey brick house which still stands on the section. Gray Young's designs include Wellington Railway Station, Wellesley House and Weir House.(8) Gray Young is best known for his work in designing neo-georgian houses and 9 Selwyn Terrace is a well preserved and elegant example of a neo-georgian house that should be protected.(9)</li> <li>- The house was built by Horace Collins in 1)923/24. The White family moved into the new house in August 1924. Four generations of the White family have lived in the house since that time.</li> <li>- The following houses were already in Selwyn Terrace in 1922, with several having been built in the 19th century: <ul style="list-style-type: none"> <li>a Number 14;</li> <li>b Number 15;</li> <li>c Number 16;</li> <li>d Number 17;</li> <li>e Number 18;</li> <li>f Number 19;</li> <li>g Number 21.</li> </ul> </li> <li>- The house at 11 Selwyn Terrace was built in 1927 for Mrs MER Tripe, a Wellington portrait painter of national importance in the 1920s and 30s.(10) The house at 20 Selwyn Terrace was</li> </ul>				
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			<p>built in the early 1930s.<sup>11</sup> The house at 23 Selwyn Terrace, designed by Sir Michael Fowler, was built by my parents in 1980/81.</p> <p>Height restriction matters specific to 9 Selwyn Terrace</p> <ul style="list-style-type: none"> <li>- The Spatial Plan proposes to impose a minimum building height of 6 storeys on new buildings in the Central Area. Selwyn Terrace is proposed to become part of the Central Area.</li> <li>- These proposed minimum heights conflict with height restrictions currently imposed on two properties, 23 Selwyn Terrace and 54 Hill Street. The restrictions are imposed by registered covenants, which would prevent development of these properties to the proposed 6 storey minimum (without the agreement of the owners of the beneficial land).</li> <li>- The effect of the covenant on the title of 23 Selwyn Terrace is that any new or existing buildings at - Selwyn Terrace must not exceed a height of 48.16 metres above the Wellington City Datum 1953 (mean sea level).</li> <li>- The effect of the covenant on the title of 54 Hill Street is that any new or existing buildings at 54 Hill Street must not exceed a height of 48.81 metres above the mean sea level.</li> <li>- A building height of 6 storeys would exceed these restrictions.</li> <li>- Both of these covenants are for the benefit of 9 Selwyn Terrace. If the owner(s) of 23 Selwyn Terrace or 54 Hill Street wanted to build higher than the current height restrictions, the owner(s) of 9 Selwyn Terrace would need to agree to discharge the covenant from the relevant title.</li> <li>- The minimum height of 6 storeys is therefore inappropriate for 9 Selwyn Terrace and its two neighbouring properties as this would be subject to these covenants. Rather, an Inner Residential zone and Pre-1930s Character Overlay would better align with the constraints imposed through property law.</li> </ul> <p>Is it necessary to sacrifice heritage?</p> <ul style="list-style-type: none"> <li>- I understand that Wellington needs to change in order to accommodate its growing population, and that government direction obliges the Council to plan for these changes. I also accept that people now desire a wider range of housing options than was the case in the past. I support the Council's efforts to start a conversation about these issues.</li> <li>- As the COVID-19 pandemic has demonstrated, however, the ways in which society lives and works can change quickly and in unexpected ways.<sup>(12)</sup> A greater number of people have found that working from home suits their lifestyle, and are continuing to do this on a full or part time basis. As a consequence, the demand for office space in Wellington has reduced. These changes present an opportunity to repurpose existing office and parking buildings for residential purposes.</li> <li>- The pandemic has also demonstrated that heritage and character buildings and spaces are valued by the whole community — not just those who live in them. They create interest, delight, and visual variation to those who live and work nearby. Those qualities are all the more important during times when travel is restricted.</li> <li>- In my view the recent changes to our working styles and available sites elsewhere will free up more than enough residential space. It is not necessary to sacrifice the history and special</li> </ul>				
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				<p>character of our City in order to provide sufficient housing. A blanket requirement for six storey apartment buildings is not warranted.</p> <p>Further points;</p> <p>The relevant background documents which I have obtained under the Local Government Official Information and Meetings Act 1987 indicate that in making its decision to change the zoning for Selwyn Terrace the Council did not consider the submissions made in 2020 by the residents of Selwyn Terrace, the environmental impacts of its decision on Selwyn Terrace itself or the feasibility of the zoning change. The decision was made in the context of wider housing concerns without separate consideration of the unique position and character of the enclave of homes in Selwyn Terrace.</p> <p>In particular, there is no mention in the Council's documents of the following factors which militate against the construction of six to nine storey buildings in Selwyn Terrace:</p> <ol style="list-style-type: none"> <li>1. Selwyn Terrace is a cul-de-sac with a single carriageway for much of its length. Access, turning and parking is therefore already limited for existing residents, their visitors, service providers and emergency services, and would be problematic for a developer.</li> <li>2. The proximity of the Wellington earthquake faultline and the urban motorway gully would in any event have significant effects on the costs of construction and insurance.</li> <li>3. The cost of purchase or renting apartments in such buildings would be likely to deter first home buyers and tenants.</li> <li>4. Such buildings would have adverse environmental impacts on the neighbouring Parliamentary, educational and ecclesiastical precincts.</li> </ol>			
<b>Selwyn Street CCZ Zoning concerns</b>	Marilyn Powell	615.1	Rezoning of Selwyn	<p>I wish for it to be known that the WCC is out of order to be trying to rezone the Hobson Precinct and Selwyn Terrace as Central.</p> <p>The Hobson Precinct; being Hobson St, Hobson Cres, Katherine Ave, Turnbull St, and the Eastern side of Murphy St are <b>residential</b>. There is no commercial use in the Hobson Precinct nor Selwyn Tce.</p> <p>Hobson Street is shown on the <b>WCC's tourist map</b> as a street with Heritage houses and the indicated route for tourists to walk from Old St.Paul's to Katherine Mansfield House.</p> <p>Hobson Precinct and Selwyn Tce residents are part of the Thorndon community. Thorndon is part of our <b>cultural identity</b> and Thorndon must be unified under one set of planning controls.</p> <p>The Hobson Precinct and Selwyn Terrace are <b>not "pockets" to be stitched up</b> by the Councillors.</p>			<p><b>Hobson Street and Hobson Crescent rezoned. No change to Selwyn Terrace or Portland Crescent.</b></p> <p>Hobson Street and Hobson Crescent have been re-zoned to High Density Residential Zone due to the large residential activity in this area and the current pattern of fractured land ownership within the area.</p> <p>Whilst the majority of properties on the western and north-western edge of Selwyn Terrace are residential in nature, there are a mixture of uses along the eastern portion of Selwyn Terrace and the surrounding area more widely. This includes the British High Commission, The Catholic Institute of Aotearoa NZ, and St Mary's College.</p>

							The height limit for Selwyn Terrace and the surrounding area is 27m (roughly 8 stories). This is only an extra 7m from what would be allowed under the High-Density Residential Zone alternative for this site.
<b>Selwyn Terrace and Portland Crescent CCZ Zoning concerns</b>	Historic Places Wellington - Vivienne Morrell; DJ Cranko	640.1, 1038.1	Rezoning of Selwyn and Portland	<p>Thorndon: Central City Zone</p> <p>HPW does not support the rezoning of Thorndon residential areas on the east side of the motorway to central city.</p> <p>No evidence has been provided for that rezoning and HPW proposes that the residential nature of the Hobson St area, Selwyn Terrace and Portland and Hawkestone Streets should remain part of the residential Thorndon suburb.</p> <p>HPW has previously proposed a shrinkage or “right-sizing” of the city centre zone in order to recognise the surplus of low grade office accommodation in it. This building stock can, and is in some cases, being repurposed as residential, which is a more sustainable approach to building; especially given the changes in patterns of living and working post-COVID.</p> <p>The Council’s own planning assessment work also confirms that there is a high percentage of quality residential buildings in the existing residential enclaves of the east side of the motorway in Thorndon sufficient to justify the protection of these areas as a qualifying matter under the National Policy Statement-Urban Development.</p>			<p><b>Hobson Street and Hobson Crescent rezoned. No change to Selwyn Terrace or Portland Crescent.</b></p> <p>Hobson Street and Hobson Crescent have been re-zoned to High Density Residential Zone due to the large residential activity in this area and the current pattern of fractured land ownership within the area.</p> <p>Whilst the majority of properties on the western and north-western edge of Selwyn Terrace are residential in nature, there are a mixture of uses along the eastern portion of Selwyn Terrace and the surrounding area more widely. This includes the British High Commission, The Catholic Institute of Aotearoa NZ, and St Mary’s College.</p> <p>The height limit for Selwyn Terrace and the surrounding area is 27m (roughly 8 stories). This is only an extra 7m from what would be allowed under the High-Density Residential Zone alternative for this site.</p>
<b>Selwyn Terrace and Portland Crescent CCZ Zoning concerns</b>	Denise Almao	652.1	Rezoning of Selwyn and Portland	C I am opposed to the proposal to re-zone as City Centre all existing residentially zoned land east of the motorway (eg Hobson Street, Portland Crescent and Selwyn Terrace).			<p><b>No change to Selwyn Terrace or Portland Crescent.</b> See above rationale for retaining Selwyn Terrace in the City Centre Zone. The same rationale applies to Portland Crescent.</p>
<b>Selwyn Terrace and Portland Crescent CCZ Zoning concerns</b>	Wellington’s Character Charitable Trust - Felicity Wong	1054.2	Character precinct overlay	<p>Keep Wellington’s Character (KWC):</p> <p>3.For zoning in character inner suburbs, KWC:</p> <ul style="list-style-type: none"> <li>Proposes that Hobson St, Hobson Cres, Selwyn Tce, Portland St and the south side of Hawkestone St be character precincts.</li> </ul>			<p><b>Hobson Street and Hobson Crescent rezoned.</b> Acknowledge feedback regarding Hobson Street. After reviewing the City Centre Zone</p>

<p><b>Hobson Street Rezoning to MDRZ</b></p>	<p>Thorndon Society</p>	<p>581.1</p>	<p>Zoning of Hobson Street</p>	<p>The Thorndon Society believes the proposals in the Draft District Plan will subvert everything the Society has fought to achieve to protect and enhance the heritage and residential character of Thorndon for almost 50 years. We have two major concerns:</p> <p>1. The proposal to rezone as City Centre all existing residentially zoned land on the east side of the motorway...</p> <p><b>PROPOSED CITY CENTRE ZONING</b></p> <p>To date no compelling justification has been produced to extend the City Centre zoning to the boundary of the Urban Motorway. We believe there is sufficient City Centre land to provide for future needs over the life of the Plan without impinging on the residential areas of Thorndon.</p> <p>It appears that the zoning has been proposed in the misguided belief that it will promote residential development when there is nothing in the City Centre zoning to require the provision of new housing. The Society requests the proposed City Centre zoning over existing residential areas in Thorndon be withdrawn and that the Council work constructively with the community to seek acceptable planning solutions.</p>				<p>Purpose, the current land uses and economic advice, Council has decided to return Hobson Street and Hobson Crescent to a Residential Zone. This would be High Density Residential Zone due to this area being in the Walking Catchment. This means that the maximum height limit would be 21m.</p>
<p><b>Hobson Street Rezoning to MDRZ</b></p>	<p>Angie &amp; James Whyte, Jennifer Langford, Mark Alexander Lamerton, Graham Archer, Pat Thorn, Kathryn Lethbridge, Victor (Alan) Langford, Richard Murcott, Charlotte von Dadelszen, Kali Amanda Gazley, Susan Du Chateau, Isabella Smith, Sue Elliot, Hugo Lethbridge, Gabrielle Anne Rongen, Jane McCort, Jack E. Smith, Rob Taylor, Rhys Weyburne, Michael Craig Smith, Guy Montogomerie Lethbridge, David and Hillary Young, Anthony Sturrock, Myles Gazley, Katherine Mansfield</p>	<p>258.1, 424.1, 454.1, 460.1, 489.1, 503.1, 523.1, 527.1, 570.1, 647.1, 659.1, 756.1, 766.1, 834.1, 886, 894.1, 906, 943, 956, 986.1, 1009.1, 677.1, 761.1, 976.1, 610.1, 586.1, 1000.1</p>	<p>Zoning of Hobson Street</p>	<p>The Draft District Plan has the Hobson precinct (defined below) included in the City Centre Zone. It is my submission that this zoning should be amended to the zoning recommended in the Officer Recommended Spatial Plan (also known as the "Preapproved Spatial Plan 2021"), i.e., to the Medium Density Residential Zone with character protection as noted in that Spatial Plan.</p> <p>The term "Hobson precinct" has been used to include the area currently zoned Inner Residential in the block bordered by Murphy St, Fitzherbert Tce, Pipitea St, Moturoa St and Hobson St and including the north side of Davis St.</p> <p>The reasons for my views are set out below:</p> <ul style="list-style-type: none"> <li>• The area is not one or two 'special buildings' but an entire community of buildings that share and reflect a common history: a history of the city itself and its development from a small town to one bustling with merchants.</li> <li>• The area is entirely residential excepting two embassies and three schools.</li> <li>• Appropriate intensification of this area and land use is better achieved through Medium Density Residential zoning, in accord with the rest of Thorndon.</li> <li>• Larger scale City Centre intensification is not readily achievable; this Hobson precinct is made up of small, often cross-titled, individually owned parcels of land.</li> <li>• The staggering infrastructure costs to meet three water requirements make the City Centre Zone development in this area unrealistic.</li> <li>• Intensification of the area happened in the 1930s, where now the once grand homes with grand gardens, are now large homes with subdivided sections. The average property size is 500sqm.</li> <li>• The suitability of City Area Zoning is also called into question, with the mandatory development of 6+ storeys to new buildings. The Hobson precinct along with the rest of Thorndon follows and, in some cases, on top of the Wellington fault line. Seismic resilience of tall buildings in this area has been proven by the 2016 earthquake to not be a good idea.</li> <li>• Hobson precinct in and of itself provides a link to our past and enhances the city's character and liveability. There is not a single pre-1930s building that is no longer fit for purpose, but rather homes of excellent quality and restored.</li> </ul>				



	<p>Birthplace Society - Cherie Jacobson,</p>		<ul style="list-style-type: none"> <li>• The Hobson precinct's make up of small individually owned parcels of land and the area's astronomical infrastructure costs to meet three water requirements makes City Centre Zone development in this area unrealistic.</li> <li>• The potential loss in the Hobson precinct of historically and architecturally significant houses, established greenery and permeable surfaces makes City Centre development in this area inappropriate.</li> <li>• Hobson precinct sits within the definition of Medium Density Residential Zone in the Draft District Plan. It does not fit the City Centre Zone characteristics of the "principal commercial and employment centre for the City and metropolitan area". The regulations appropriate to Taranaki St, Courtney Place and Thorndon Quay are incompatible with the Hobson precinct.</li> <li>• Council planners, in response to further work following submissions on the Draft Spatial Plan, recommended the Hobson precinct retain residential zoning with a subset of character protection. This advice should not be rejected unless evidence, based on sound town planning principles, can be provided to justify not following those recommendations.</li> <li>• Allowing unrestricted City Centre intensification in the Hobson precinct risks opportunistic development creating a pepper pot cityscape and could lead to the loss of this area of Thorndon, considered by many to be an architectural and historical gem.</li> <li>• There are significant areas of underutilized land in Wellington that would allow large scale intensification to take place in a harmonious and considered way, repurposing existing buildings, developing complementary green spaces and resulting in improvement to areas that currently contribute little or indeed have a negative impact on the existing urban landscape.</li> <li>• The National Policy Statement – Urban Development 2020 ("NPS-UD") does NOT require that the Hobson precinct be zoned as City Centre Zone. The requirements of the NPS-UD requirements are met if the Hobson precinct is zoned Medium Density Residential Zone.</li> <li>• The inclusion of the Hobson precinct in City Centre does not increase the estimated new dwellings or estimated number of people in the City Centre so what is the justification for the zone change?</li> <li>• Sound town planning and place-based evidence should shape the direction of our city, not an unquestioning adherence to an "intensification at all costs" political ideology.</li> </ul> <p>[Redacted name]</p> <p>There are three schools in the Hobson precinct with children attending from Pre-School to Year 13. Changing the zoning to City Centre Zone would be a safety risk for these children and their whanau.</p> <p>[From Angie &amp; James Whyte]</p> <p>In summery, the view of my family is that it is appalling to propose a change to this heritage neighbourhood which is unique in so many ways. Instead of attempting to destroy an historical and charming part of Wellington, our view is that we should strive to protect this precinct. While I understand the need for urban development and increased housing options, this is not the area to select.</p> <p>There is no way to recreate an area such as the Hobson Precinct - with heritage wooden homes/buildings, greenery and bird life. Wellington is so lucky to have such beauty so near to the city. Our city needs to treasure such areas and intensify other more appropriate areas within the urban footprint. Hobson precinct is well looked after by its residents who take great pride in their homes and gardens, it is therefore appreciated by all who pass by or visit.</p>				
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				Please take a step back and reflect that it would be heartbreaking not only for residents but for the wider public and Wellington City to lose such a gem in the city and at such a huge cost to us all.			
<b>Hobson Street Rezoning to MDRZ</b>	Susan Du Chateau	647.1	Zoning of Hobson Street	<ul style="list-style-type: none"> <li>• Sound town planning and place-based evidence should shape the direction of our city, not an unquestioning adherence to an “intensification at all costs” political ideology. Kourtit, Nijkamp and Whalstrom (Land Use Policy vol 111, December 2021) undertook an analysis of urban attractiveness in relation to making cities the home of the people. They identified two factors SOUL -the spirit, history, cultural identity, ambience and BODY – the infrastructure, amenities, housing supply, green areas.</li> <li>• The authors concluded that BOTH FACTORS MATTER. The Hobson precinct is a collection of buildings and spaces which are the fabric of this first suburb in Wellington. Thorndon has the distinction of being an ‘historic’ suburb based on the prolific writings about it. It must not be destroyed and lost to future generations....</li> <li>• The political decision to rezone this precinct is not democratic and is unacceptable.</li> </ul>			
<b>Hobson Street Rezoning to MDRZ</b>	Kathryn Lethbridge, Xun Duan, Sue Elliot, Jane McCort	503, 706, 756, 906.1	Zoning of Hobson Street	<p>The Draft District Plan has the Hobson precinct (defined below) included in the City Centre Zone. It is my submission that this zoning should be amended to the zoning recommended in the Officer Recommended Spatial Plan (also known as the “Preapproved Spatial Plan 2021”), i.e., to the Medium Density Residential Zone with character protection as noted in that Spatial Plan.</p> <p>The term “Hobson precinct” has been used to include the area currently zoned Inner Residential in the block bordered by Murphy St, Fitzherbert Tce, Pipitea St, Moturoa St and Hobson St and including the north side of Davis St.</p> <p>The reasons for my views are set out below:</p> <p>The Draft District Plan changes the zoning for the Hobson precinct in Thorndon from Inner Residential (with pre-1930 rules) to a City Centre Zone “CCZ”. This represents a radical change and no robust evidence has been offered to justify it. It is my submission that retaining a residential zoning, as is proposed for the rest of Thorndon, will enable appropriate intensification of land use in this area and lead to significantly better outcomes than the proposed change to CCZ.</p> <p>The Hobson precinct has many specific characteristics that make intensification on the nature intended for CCZ untenable. The fragmented ownership of small parcels of land (see “Land ownership”) and the high cost of meeting the three water requirements (see “Infrastructure”) make CCZ development unrealistic. Additionally, the large number of historically and architecturally significant houses, established greenery and permeable surfaces that would be lost make CCZ development inappropriate.</p> <p>Following consultation on the draft Spatial Plan, the Council planners recommended that the Hobson precinct NOT be zoned CCZ and instead be zoned (the equivalent of) Medium Density Residential Zone “MRZ” and that character recognition and protection be applied to a subset of the precinct (see “WCC planners’ advice”). For the Council to arbitrarily reject this advice for political reasons and revert to zoning the area CCZ does not reflect the evidence and place-based town planning approach needed if Wellington is to retain its charm, character and vibrancy. Instead, it creates a real risk of opportunistic development creating a pepper pot cityscape that will result in the loss of an area of Thorndon considered by many to be an architectural and historical gem.</p>			

			<p>There are significant areas of underutilized land in Wellington that would allow large scale intensification to take place in a harmonious and considered way, repurposing existing buildings, developing complementary green spaces and resulting in improvement to areas that currently contribute little or indeed have a negative impact on the existing urban landscape.</p> <p>Despite often being used as a justification for politically motivated decisions supporting an “intensification at all costs” approach, the National Policy Statement – Urban Development 2020 (“NPS-UD”) does NOT require that the Hobson precinct be zoned as CCZ. The requirements of the NPS-UD requirements are met if the Hobson precinct is zoned MRZ (see “National Policy Statement – Urban Development”).</p> <p>It is my submission that the proposed rezoning of the Hobson precinct as CCZ is unjustified and risks a great deal for no tangible gain. Appropriate intensification and protection of this important area can be achieved by reinstating the Council planners’ recommendations to zone the area MRZ, with character protection.</p> <p><b>Land ownership</b></p> <p>Once the campuses of Wellington Girls’ College, Queen Margaret College and Thorndon School are removed from the Hobson precinct, the land remaining is very limited in terms of size and development potential. This land is predominantly held in small individually owned residential parcels, unsuitable for large scale development or is already in a multi-unit residential development with cross-titles, that preclude single ownership (and therefore development).</p> <p>On page 9 of the document “Central City Spatial vision for Wellington City Council” (February 2020) the example used as a benchmark for Centre City development to address issues around residential growth is the Sanctum Apartments. This development of 94 units has a site area of 6500m2.</p> <p>Centre City development of this nature is not a reality for the Hobson precinct where the average single dwelling land parcel is under 500m2. The type of intensification that would be realistic in the Hobson precinct (and that meets the NPS-UD requirements) is enabled in the MRZ and as such, it is my submission that MRZ is the appropriate zoning for the Hobson precinct.</p> <p><b>Draft District Plan zone definitions</b></p> <p>The Draft District Plan refers to the MRZ as encompassing: ...</p> <p>This description is entirely appropriate for the Hobson precinct.</p> <p>In contrast, the Draft District Plan refers to the CCZ as being the “principal commercial and employment centre for the City and metropolitan area”, using terminology like “commercial heart” and “major employer”. These are not characteristics of the Hobson precinct as it is currently and nor, for the reasons contained in this submission, are they likely to ever be.</p> <p>It is my submission that correct application of the Draft District Plan definitions requires that the Hobson precinct be included in the zone that most accurately describes it, which is MRZ.</p> <p><b>Hobson precinct as an “Area of Change”</b></p>				
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			<p>These recommendations arose out of “further work undertaken” in response to the good faith consultation process undertaken in respect of the Draft Spatial Plan, and reflect the neutral and considered professional advice of the Council’s planning section. At the Planning and Environment Committee meeting on 24 June 2021 a 9:6 majority of Councillors rejected all of the changes to the Draft Spatial Plan recommended by the Council’s planning team. There is nothing in the meeting minutes to indicate that any consideration was given to the impact of that political decision on areas affected or if any alternative evidence was produced or considered to support that rejection.</p> <p>Such disregard for the Council’s planners’ recommendations on how Wellington should be thoughtfully and appropriately developed quite frankly beggars belief! The circumstances of the rejection, i.e., with no justification provided, suggests that the consultation process on the Draft Spatial Plan was not undertaken in good faith by the majority of Councillors.</p> <p>In September 2021, the Council released a document “Our City Tomorrow, Spatial Plan for Wellington City, Updated City-wide Estimated Growth Distribution Figures” (September 2021) that reviewed the impact of the Councillors’ rejection of their Planners’ advice i.e., the difference in outcomes between the Officer Recommended Spatial Plan and version adopted after the June meeting (where the changes were rejected). The document states that the rejection of the Planners’ recommendations resulted in the potential capacity for new housing development increasing, “from an estimated 23,000 – 29,700 additional dwellings presented in the Officer Recommended version of the Spatial Plan, to 24,600 – 31,100”.</p> <p>This represents an increase in dwellings of between 7% and 4.9%, however, the document shows that between the two versions there was NO increase in the estimated dwellings or estimated number of people in the City Centre.</p> <p>In the absence of an increase in estimated dwellings or estimated people in the City Centre, what justification can be given for the Councillors’ decision to ignore their planners’ advice and zone the Hobson precinct in CCZ and to remove the recommended character protection?</p> <p>Unless there is a robust evidence to support the Councillors’ rejection of their planners’ advice, I submit that the planners’ recommendations for the Hobson precinct should be reinstated and as a result, the Hobson precinct should be taken out of CCZ</p> <p>and instead be zoned MRZ and the sub-areas identified as appropriate for character protection within the Hobson precinct should also be reinstated.</p> <p><b>Infrastructure issues</b></p> <p>The “Wellington City Council – 3 Waters Assessment” (March 2021) puts the 3 waters upgrade costs per new dwelling in Thorndon at around \$520,000 (compared to Newtown at around \$180,00 or Johnsonville at around \$120,000 or Khandallah at around \$60,000). The document concludes that significant upgrades to 3 water infrastructure will be undertaken in the Te Aro and Adelaide Rd areas of the Central City as an “immediate” priority, however, the upgrade to infrastructure in Thorndon was considered a “medium term” project to create development capacity in the “long term”, i.e., not happening any time soon.</p> <p>The excessive cost to meet infrastructure requirements is a significant impediment to intensification in the Hobson precinct. This is very relevant when assessing the likelihood of intensification. These factors affect the estimated uptake of development and Council’s ability</p>			
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				<p>to consider significant development in the Hobson precinct as “infrastructure ready” or “feasible and reasonably expected to be realized” under the NPS-UD.</p> <p>This is another reason why there is no likelihood of significant development of the nature of CCZ and I submit that this reinforces the lack of evidence to support zoning the Hobson precinct CCZ.</p> <p><b>The National Policy Statement – Urban Density (NPS-UD)</b></p> <p>Despite being repeatedly put forward as a justification for any decision that increases intensification, including presumably the Council’s decision to include the Hobson precinct in CCZ, the NPS-UD does not require the Hobson precinct to be zoned CCZ. The only requirement that the NPS-UD places on the Hobson precinct (Policy 3 (d)) is that the District Plan should enable:...</p> <p>This is met if the Hobson precinct is zoned as MRZ. It is my submission that not only does the NPS-UD not require that the Hobson Precinct be zoned CCZ, the objectives of the NPS-UD are more likely to be achieved by zoning the Hobson precinct as MRZ, as intensification of the type envisaged for that zone is a more realistic prospect for this area.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Richard Murcott, Sue Elliot	523.1, 756.1	Zoning of Hobson Street	<p>2. The Draft District Plan proposes a radical change; that the Hobson precinct of Thorndon be treated completely differently from the rest of residential Thorndon by being zoned City Centre Zone (CCZ).</p> <p>3. I request an amendment to the draft District Plan; that the zoning is returned to at least that recommended in the <i>Pre-approved Spatial Plan of June 2021</i> (recommended by officers following wide public consultation) i.e. to the Medium Density Residential Zone (MDRZ) and <b>with character protection</b> over much of the Hobson precinct (i.e. extended).</p> <p>4. The Spatial Plan has a 30yr planning horizon; the District Plan a 10yr perspective. I cannot reconcile how, a few months ago, devoid of further public consultation, the Hobson precinct abruptly flopped from being recommended as an inner residential zone to being proposed as City Centre in the draft DP. Such a radical is not an imperative within the next 10yrs. No robust rationale has surfaced for this proposal. The consultation process has run off the rails, and the decision-making become non-transparent.</p> <p>5. The Hobson precinct is a significant spatial area of inner residential Thorndon, situated on the easternmost boundary of the suburb. On this map it is coloured orange. The red line is Thorndon’s boundary, so this illustrates that the precinct represents a fair proportion of the suburb. The area has numerous factors that qualify it as an important character precinct with distinctive features involving high character and heritage values, and more.</p> <p>6. The precinct is a significant part of Thorndon’s heritage trail, being situated between Katherine Mansfield House &amp; Garden (her birthplace) to the north and Old Saint Pauls which lies south of the precinct. There is a strong connection between the history of the Hobson precinct, and both Katherine Mansfield and Old Saint Pauls.</p> <p>7. Retaining a residential zoning, similar to the rest of Thorndon, can still enable appropriate intensification of land use in this area and encourage significantly better outcomes than the proposal to rezone this area City Central.</p>			

			<p>8. The Hobson precinct has numerous specific characteristics that make intensification untenable on a City Centre scale. Aside from the character and heritage values, the fragmented ownership of small parcels of land (see the section below on 'Land ownership') and the high cost of meeting the three water requirements (see 'Infrastructure') make a CCZ type development quixotic. Additionally, the large number of historically and architecturally significant houses, established greenery and permeable surfaces that would be lost or adversely impacted, also makes CCZ an incompatible option.</p> <p>9. Following consultation on the draft Spatial Plan, the Council planners recommended that the Hobson precinct be zoned (the equivalent of) Medium Density Residential Zone "MDRZ" and, significantly, that character recognition and protection were appropriate for parts of the precinct (ref. the section below entitled 'WCC planners' advice).</p> <p>10. For the Council to reject this advice does not reflect the evidence and place-based town planning approach needed if Wellington is to retain its charm, character and vibrancy. Instead, it creates a real risk of permissive, opportunistic development creating a pepper pot cityscape that would unnecessarily risk the loss of an important part of Thorndon that is considered an architectural and historical gem.</p> <p>11. Yet there are significant other areas of underutilized<sup>1</sup> land in Wellington that would allow large scale intensification to take place in a harmonious and considered way, rebuilding/repurposing existing buildings, developing complementary green spaces and resulting in improvement to areas that currently contribute little or may even have a negative impact on the existing urban landscape.</p> <p>Thorndon Quay is adjacent to the Hobson precinct. The Quay is already in the City Centre Zone. The area has significant unrealised potential for additional dwellings and is not encumbered with the residential character, heritage and other values associated with the Hobson precinct.</p> <p>12. Despite often being used as a justification for politically motivated decisions supporting an 'intensification at all costs' approach, the NPS-UD does <b>not</b> require that the Hobson precinct be zoned as CCZ. It's requirements are met if the Hobson precinct is zoned MDRZ and qualifying matters applied (see further comments in the section on NPS-UD).</p> <p>13. Accordingly, I contend that the proposed rezoning of the Hobson precinct as CCZ is unjustified and that it risks a great deal for no tangible gain for Thorndon nor the city. Appropriate intensification and protection of this important area can be achieved by reinstating the Council planners' recommendations to zone the area MDRZ, with character protection.</p> <p><b>Land ownership</b></p> <p>14. Once the campuses of Wellington Girls' College, Queen Margaret College and Thorndon School are accounted for, the remaining land in the precinct is limited in terms of size and development potential. 30 individually owned residential parcels are well less than 600m<sup>2</sup> each in area, which means they are unsuitable for large (city scale) development. Other parcels are already in multi-unit residential development or cross-lease, that preclude single ownership (and therefore development).</p> <p>15. For comparison, on p9 of the document <i>Central City Spatial vision for Wellington City Council</i> (February 2020) the example used as a benchmark for Centre City development to</p>			
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			<p>address issues around residential growth is the Sanctum Apartments. This development of 94 units has a site area of 6500m<sup>2</sup>.</p> <p>16. Centre City development of this nature is not a reality for the Hobson precinct where the average single dwelling land parcel area is less than 500m<sup>2</sup>.</p> <p>17. The type of intensification that would be realistic in the Hobson precinct (and that meets the NPS-UD requirements) is enabled in the MDRZ. Therefore, MDRZ is the appropriate zoning for the Hobson precinct.</p> <p><b>Draft District Plan zone definitions</b></p> <p>18. The Draft District Plan refers to the MDRZ as encompassing: ... This description is appropriate for the Hobson precinct.</p> <p>19. In contrast, the Draft District Plan refers to the CCZ as being the ... These are not characteristics of the Hobson precinct.</p> <p>20. An application of the Draft District Plan definitions requires that the Hobson precinct be included in the zone that most accurately describes it, which is MDRZ.</p> <p><b>Hobson precinct as an “Area of Change”</b></p> <p>21. The <i>Central City Spatial Vision for Wellington City Council</i> (February 2020) envisaged that there would be “Areas of Change” incorporated into the Central City as a result of town planning changes.</p> <p>22. The document identified the type of factors for determining an “Area of Change”. Applying these factors to the Hobson precinct is incongruent. The document refers to: “<i>groups of poor quality existing buildings that can be repurposed or removed, conducive land/property values, owner aspirations, proximity to transport, infrastructure capacity, or renewal opportunities</i>”.</p> <p>23. The Hobson precinct dwellings consist predominantly of high quality, high value, lovingly renovated and architecturally significant homes (externally &amp; internally). As such, it does not present an opportunity for renewal in the way that many run down and underutilised areas in or adjacent to the current city centre zone do. Residents like me in my neighbourhood do not identify with or want to be included in the city centre. Plus, there are the suburb’s infrastructure woes which mean that the per new dwelling cost of meeting 3 water infrastructure requirements are over twice that of most suburbs (see the section on ‘Infrastructure issues’). The document also states that “Areas of Change” will be “<i>multiple sites or at least sites of a size that support a comprehensive approach to amenity</i>” – again, this is entirely counter to the reality of the Hobson precinct.</p> <p>24. Additionally, the document refers to including “place-based planning” where “Areas of Change” are proposed. The change from the current zoning of Inner Residential (with protections for pre-1930 character) to CCZ is extreme. The town planning regulations for CCZ are designed for areas like Taranaki Street, Courtney Place, Lambton Quay and Thorndon Quay. Those areas contain commercial, retail, hospitality, large scale apartment developments (e.g., Sanctum Apartments) and Government activities and are incompatible with the Hobson precinct (see “<i>Draft District Plan Zone definitions</i>”).</p>			
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			<p>25. Such a radical change as suggested for the existing residential Hobson precinct should not be undertaken as a cookie cutter exercise of applying straight lines to a map or to adopt a political ideology 'intensification at all costs', without consideration of impact and <b>evidence</b> of significant benefit.</p> <p>A place-based approach to town planning demands that due regard be given to the unique nature of an area and requires that questions be asked like "Is this change appropriate?", "What will the city/this area gain from the change?", "What does the city/this area risk losing as a result of this change?". This sort of evidence-based process resulted in the Council planners recommending that the Hobson precinct be zoned MDR with character protection where appropriate, following consultation on the Draft Spatial Plan (see section on 'WCC planners' advice)</p> <p>26. The Hobson precinct has none of the factors identified in this document as characterising an Area of Change and given that the only place-based planning that has occurred since this document's publication resulted that the Council recommending that the Hobson precinct NOT be zoned City Centre, the area cannot be rightly considered an Area of Change appropriate for inclusion in the CCZ. As such, the Hobson precinct should retain its residential zoning.</p> <p><b>WCC planners' advice</b></p> <p>27. The Draft Spatial Plan introduced increased intensification across the city and represented a significant change in the Council's approach to recognizing and protecting character for inner residential housing. The Council ran an extensive (and expensive) consultation process and this year nearly 3000 Wellingtonians made submissions on the Draft Spatial Plan. Following due consideration of the submissions, the Wellington City Council's planning team released the Officer Recommended Spatial Plan (also known as the "Pre-approved Spatial Plan 2021").</p> <p>28. Officer Recommended Spatial Plan moved things somewhat nearer to the mark for the Hobson precinct:</p> <p><i>"... as a result of further work undertaken, it is recommended that in terms of Thorndon, only the currently Inner Residential zoned properties in the vicinity of Selwyn Terrace and Portland Crescent be integrated into the Central City area, and that the Hobson Street/Hobson Crescent/Turnbull Street areas be excluded from the Central City because of their character values. The Selwyn Terrace and Portland Crescent areas are surrounded by the existing Central Area zone and abut existing office blocks and a range of other uses. The Hobson Street/Hobson Crescent/Turnbull Street areas are recommended to be excluded from the Central City because of their more coherent character values. These areas will instead be identified as medium density residential areas under the new District Plan, with some Character Precinct identification in the Hobson Street area."</i></p> <p>29. These recommendations arose out of "further work undertaken" in response to the good faith consultation process undertaken in respect of the Draft Spatial Plan and reflect the neutral and considered professional advice from the Council's planning division.</p> <p>30. But at the Planning and Environment Committee meeting on 24 June 2021 a 9:6 majority of Councillors rejected all the recommendations. There is nothing in the meeting minutes to indicate that any consideration was given to the impact of that political decision on areas affected or if any alternative evidence was produced at that time to support that rejection. It</p>				
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			<p>illustrated a disregard for all who make thoughtful contributions through that consultation process, and of those who forged recommendations out of the complexity. With the circumstances of the rejection being devoid of justifications at that time, this suggested that the consultation on the Draft Spatial Plan was not undertaken in good faith by many Councillors.</p> <p>31. I submit that, as a minimum, the planners' recommendations for the Hobson precinct be reinstated as a starting point and that the Hobson precinct should be taken out of CCZ and instead be zoned MDRZ and the character sub-areas identified within the Hobson precinct reinstated (as a minimum).</p> <p>32. A major concern is that extent of the character sub-area recommended by officers was still too constrained. Their sub-area abandoned many significant contributors to the character of the Hobson precinct.</p> <p>33. There are numerous aspects to character of this precinct. Hobson St alone has character that has evolved over 150yrs of inner residential design, and the pre-1930 residences alone do not hold all the keys to the character and charm of this precinct. There is an interplay of a complex range of residences, and associated green spaces, which, all together, form the delightful coherence and charm of this valued residential place in the city.</p> <p>34. A fresh analysis, actively involving community, would reveal the full extent of the elements of this urban environment and all the contributors to the character of the precinct. All factors need to be accounted as qualifying matters with respect to character and heritage sub-area of this precinct.</p> <p>35. The following images illustrate just a few of the <i>other</i> significant elements (residences, streetscapes, etc) that were inexplicably <b>excluded</b> from the character sub-area recommended by the officers June 2021.</p> <p>The extent of the Hobson precinct character sub-area needs to be addressed to ensure important contributors are not 'orphaned'.</p> <p>36. Any policy or planning that jeopardises such quality, and predominantly wooden buildings (carbon in the wood), also needs to factor impacts on the city's carbon accounting and greening policies. As an established residential zone the Hobson precinct's mature trees and gardens (assist carbon sequestration) have also significantly encouraged the native bird population in this part of the city; another a widely enjoyed amenity in this precinct.</p> <p>37. A set of comprehensive amenity planning controls are needed to accompany the character sub-areas. This means the existence of comprehensive, detailed design guidelines for density done well, with community involvement. Good urban design arises from designers working with developers <b>and</b> community.</p> <p>I have heard the Chief City Planner publicly explain that this is "... <i>done with a scalpel not a mallet</i>". To deliver the diversity and quality urban design the community is a key stakeholder who can help guide some of the scalpels. Near community, especially neighbours to developments, need be actively woven into the process. If this is not done well we're likely to end up with less than optimal outcomes, for everyone. All the appropriate hooks to create opportunities to talk about design with communities must exist in the District Plan.</p> <p><b>Infrastructure issues</b></p>				
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				<p>38. The <i>Wellington City Council – 3 Waters Assessment</i> (March 2021) puts the 3 waters upgrade costs per new dwelling in Thorndon at around \$520,000 (compared to Newtown at around \$180,00 or Johnsonville at around \$120,000 or Khandallah at around \$60,000).</p> <p>39. The document concludes that significant upgrades to 3 water infrastructure will be undertaken in the Te Aro and Adelaide Rd areas of the Central City as an “immediate” priority, however, the upgrade to infrastructure in Thorndon was considered a “medium term” project to create development capacity in the “long term” i.e. not happening any time soon.</p> <p>40. The excessive cost to meet infrastructure requirements is a significant impediment to intensification in the Hobson precinct. This is very relevant when assessing the likelihood of intensification.</p> <p>41. These factors affect the estimated uptake of development and Council’s ability to consider significant development in the Hobson precinct as “<i>infrastructure ready</i>” or “<i>feasible and reasonably expected to be realized</i>” under the NPS-UD.</p> <p>42. This is another reason why there is no likelihood of significant development of the nature of CCZ and this reinforces the lack of evidence to support zoning the Hobson precinct as CCZ.</p> <p><b>National Policy Statement – Urban Development (NPS-UD)</b></p> <p>43. Despite being repeatedly put forward as a justification for any decision that increases intensification, including presumably (?) the Council’s decision to include the Hobson precinct in CCZ, the NPS-UD does not require the Hobson precinct to be zoned CCZ. The only requirement that the NPS-UD places on the Hobson precinct (Policy 3 (d)) is that the District Plan should enable building heights of least 6 storeys within a walkable catchment of the following:</p> <ul style="list-style-type: none"> <li>Existing and planned rapid transit stops</li> <li>The edge of city centre zones</li> <li>The edge of metropolitan centre zones</li> </ul> <p>This is met if the Hobson precinct is zoned as MDRZ.</p> <p>44. Not only does the NPS-UD not require that the Hobson Precinct be zoned CCZ, the objectives of the NPS-UD are more likely to be achieved by zoning the Hobson precinct as MDRZ, as intensification of the type envisaged for that zone is a more realistic prospect for the Hobson precinct. But it is also time to recognise and apply the special qualifying matters concerning the Hobson precinct.</p>		
<b>Hobson Street Rezoning to MDRZ</b>	Charlotte von Dadelszen	527.1	Zoning of Hobson Street	<p>I oppose the Council's intention to rezone land in Thorndon on the City side of the motorway from 'Residential' to 'Central Area'. This will result in the total loss of heritage housing stock over time. There are much better areas on the railway side of Thorndon Quay that are already ready for such development, and in keeping with the existing buildings. By re-classifying Thorndon in particular Davis Street and Hobson Street and surrounding areas 'central' and losing the protection of a residential zoning (and consequently the pre 1930's demolition rule) will only increase all of the factors residents have already said are reasons why they want to move out of the city. The development made possible under the Plan will create extensive shady areas, sound amphitheatres and wind tunnels.</p>		

				<p>The residential housing in these areas is now nearly completely refurbished, and many family occupied. These streets are not full of cold dilapidated housing or transient populations; families have invested significant amounts of money to restore and refurbish this housing, maintaining and protecting the existing character and heritage nature of these properties and their gardens. We have friendly, stable family orientated communities – our gardens are full of native trees, bees, tui, piwakawaka and at night even rurururu; we are central city but have worked hard to preserve encourage, promote and protect the natural environment. The development in this area of Thorndon that has been left to developers have resulted in leaky buildings, NBS issues and architectural monstrosities – refer the apartment blocks on both corners of Thorndon Quay and Davis Street, Hobson Street Flats, Hobson Court to name a few. Is this the Council's vision?</p> <p>While I am not opposed to in-fill housing, minimum 6 storey apartments or commercial offices up and down these streets would create noise, create shading issues, wind tunnels, destroy the wildlife and birdlife, and consume the very little green space and gardens that exist. This conflicts quite strongly with the No 1 policy intent from the Ministry for Environment: “Vibrant cities that support wellbeing of the people” (MFE, 2020). Tower blocks do not necessarily make for a good city – careful urban design does (see further very good points made by architect Guy Marriage - <a href="https://www.stuff.co.nz/dominionpost/comment/122919845/how-high-is-too-high-for-wellington">https://www.stuff.co.nz/dominionpost/comment/122919845/how-high-is-too-high-for-wellington</a>). Infill housing and townhouses can be constructed in sympathy with the existing character and heritage houses that already exist, and also achieve the additional housing for those that need it.</p> <p>I am particularly concerned that heritage considerations have been specifically excluded from the formulation of proposals for Thorndon. The focus has been limited to matters pertaining solely to residential character which is wrong. Thorndon's historic heritage and residential character are inextricably linked and cannot be artificially separated. Separation is clearly designed to negate arguments supporting the protection of heritage and to favour intensification and the development of more intensive forms of housing.</p> <p>I support the retention of existing planning controls and zoning on both sides of the motorway, particularly the pre 1930 demolition rule which has worked well to preserve Thorndon's heritage and residential character.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Michael Kay	267.1	Zoning of Hobson Street	I would respectfully submit that the area around Hobson Street in Thorndon should be amended to be a medium density residential zone with character protection, as recommended in the Officer Recommended Spatial Plan. Hobson is a small street and wouldn't be able to hold the infrastructure necessary (like new water pipes, parking, etc.) to become part of the CBD. It makes sense to extend the CBD North on Thorndon Quay, but not include Hobson Street.			
<b>Hobson Street Rezoning to MDRZ</b>	Mark Alexander Lamerton	454.1	Zoning of Hobson Street	<p>[In addition to standard Hobson rezoning submission above]</p> <p>The reasons for my views are set out below:</p> <p>...</p> <ul style="list-style-type: none"> <li>The current infrastructure can't cope, much less further intensification. For example - the stormwater system has a capacity problem at the bottom of Hobson/Davis Street where repeated flooding has occurred over decades and Wellington Water haven't done anything to fix it.</li> </ul>			

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<b>Hobson Street Rezoning to MDRZ</b>	Graham Archer	460.1	Zoning of Hobson Street	<p>[In addition to standard Hobson rezoning submission above]</p> <p>The reasons for my views are set out below:</p> <p>...</p> <ul style="list-style-type: none"> <li>• The potential loss in the Hobson precinct of historically and architecturally significant houses, established greenery and permeable surfaces makes City Centre development in this area inappropriate. There has already been significant loss over the years with demolition of significant old houses for the Motorway, Wellington Girls College and Thorndon school prior to restrictions been placed on further house demolition. This protection is now going to be lost.</li> <li>• Council planners, in response to further work following submissions on the Draft Spatial Plan, strongly recommended the Hobson precinct retain residential zoning with a subset of character protection. This advice should not be rejected unless evidence, based on sound town planning principles, can be provided to justify not following those recommendations. This has been an arbitrary and poor decision by WCC councilors, against the well researched advice of Council Planners.</li> <li>•</li> </ul>			
<b>Hobson Street Rezoning to MDRZ</b>	Graeme Fogelberg	821.1	Zoning of Hobson Street	<p>I have lived at this location for more than 15 years and are totally opposed to your proposal to change the Thorndon area from a Medium Density Residential Zone to a City Centre Zone .This unique Thorndon area is totally different from say The Terrace or Lambton Quay and your proposal will destroy one of Wellington s unique historical residential areas. Ifind it hard to believe that the Council could make such a stupid decision by showing no empathy for the historical heritage of New Zealand's capital city ,its not too late for you to reverse your planned zoning change and to preserve one of Wellingtons truly unique areas .</p>			
<b>Hobson Street Rezoning to MDRZ</b>	D B McKAY		Zoning of Hobson Street	<p>Concern regarding the proposal to rezone as City Centre all existing residentially zoned land on the east side of the motorway.</p> <p>To date no compelling evidence or justification has been produced to support the need for extending the City Centre zoning to the boundary of the Urban Motorway. I believe that there is more than sufficient City Centre land to provide for future needs over the life of the Plan without impinging on the residential areas of Thorndon.</p> <p>It appears that the zoning has been proposed in the misguided belief that it will promote residential development when there is nothing in the City Centre zoning to require the provision of new housing.</p>			

				<p>The Council's own planning assessment work also confirms that there is a high percentage of quality residential development on the east side of the motorway sufficient to sustain the protection of this development as a qualifying matter under the National Policy Statement-Urban Development.</p> <p>I submit that the proposed City Centre zoning over existing residential areas in Thorndon be withdrawn and that the Council work constructively with the community to seek acceptable planning solutions.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	N/A/Retracted	834.1	Rezoning of Thorndon	<p>[Same as Thorndon Society submission in addition to points below]:</p> <p>The reasons for my views are set out below:</p> <ul style="list-style-type: none"> <li>• Three schools covering all ages from preschool to year 13 occupy the Hobson precinct. An increase in intensification to City Centre Zone will increase the risk of harm to children and parents due to increased vehicle traffic and potentially other major negative factors brought by city zones (increased crime).</li> <li>• Reduction in wellbeing for existing landowners, schools, embassies, and parents due to increased traffic, making it harder to access properties, creating longer commute times, greater ambient noise increasing stress and reducing sleep, smell, loss of privacy, reduction in natural green spaces and increased pollution.</li> <li>• Infrastructure such as roading and associated parking will not be suitable (the roads have limited width) with minimal parking (parking is at a premium and usually fully occupied). This will lead to greater congestion and risk to pedestrians.</li> <li>• An increase city zone area will likely increase population density (permanent and transient working populations) leading to further traffic delays when commuting to and from outer suburbs. This may lead to further exacerbating the city/urban sprawl.</li> <li>• The uncertainty on land / building values and quality of life due to proposed changes to city zone has not been fully communicated nor researched.</li> <li>• The Hobson precinct's make up of small individually owned parcels of land and the area's astronomic infrastructure costs to meet three water requirements makes .ity Centre Zone development in this area unrealistic.</li> <li>• The potential loss in the Hobson precinct of historically and architecturally significant houses, established greenery and permeable surfaces makes City Centre development in this area inappropriate. Thorndon is the oldest suburb in New Zealand.</li> <li>• ...</li> <li>• The regulations appropriate to Taranaki St, Courtney Place and Thorndon Quay are incompatible with the Hobson precinct.</li> <li>• Council planners, in response to further work following submissions on the Draft Spatial Plan, recommended the Hobson precinct retain residential zoning with a subset of character protection. This advice should not be rejected unless evidence, based on sound town planning principles, can be provided to justify not following those recommendations.</li> <li>• ...</li> <li>• There are significant areas of underutilized land in Wellington that would allow large scale intensification to take place in a harmonious and considered way, repurposing existing buildings, developing complementary green spaces and resulting in improvement to areas that currently contribute little or indeed have a negative impact on the existing urban landscape. The primary purpose of zoning is to segregate uses that are thought to be</li> </ul>			

				<p>incompatible. In practice, zoning is also used to prevent new development from interfering with existing uses and/or to preserve the "character" of a community.</p> <p>...</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Marilyn Powell	615.1	Rezoning of Thorndon	<p>I wish for it to be known that the WCC is out of order to be trying to rezone the Hobson Precinct and Selwyn Terrace as Central.</p> <p>The Hobson Precinct; being Hobson St, Hobson Cres, Katherine Ave, Turnbull St, and the Eastern side of Murphy St are <b>residential</b>. There is no commercial use in the Hobson Precinct nor Selwyn Tce.</p> <p>Hobson Street is shown on the <b>WCC's tourist map</b> as a street with Heritage houses and the indicated route for tourists to walk from Old St.Paul's to Katherine Mansfield House.</p> <p>Hobson Precinct and Selwyn Tce residents are part of the Thorndon community. Thorndon is part of our <b>cultural identity</b> and Thorndon must be unified under one set of planning controls.</p> <p>The Hobson Precinct and Selwyn Terrace are <b>not "pockets" to be stitched up</b> by the Councillors.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Sue Elliot	756.1	Rezoning of Thorndon	<p>An Historic Area Worth Protecting:</p> <p>This area is not one or two 'special' buildings that need individual attention – the area is an entire community of buildings which share a common history, and which together form an expression of the history of the City itself. Liveable cities need a patina of age that provides not only a link to its past, but provides for its character and associated liveability. The entire streetscape in this precinct offers not a single pre 1930s building that is no longer fit for purpose.</p> <p>These streets tell a different, but important story regarding the post-colonial development of Wellington – one not told in any of the suggested sub-groups, and worth protecting to enhance the fabric and character of Wellington.</p> <p>Hobson Street in particular forms a character corridor from the government precinct to the Thorndon Character area that is entirely residential excepting two embassies and two schools.</p> <p>This area is a showcase of a special historic character reflecting a post colonial time when Wellington grew as a city and the first merchants established themselves at the turn of the century.</p> <p>The Ramifications of Re-zoning from Character to Central City:</p> <p>It beggars belief that the Council cares so little for the historic fabric and green elements of our city that this sweeping and drastic change from Inner City Residential Character to Central City Zone can be done with so little thought or consideration.</p> <p>A more considered approach, and one that would take credence of the robust evidence that has been provided to Council, would be to retain the residential zoning, as is proposed for the rest of Thorndon, enabling appropriate intensification of this area and land use through the Medium Density Residential Zone.</p>			

			<p>The heritage value of not only the individual houses, but also the streetscape can and has been maintained by townhouse developments of three stories appropriately set back within the property boundaries.</p> <p>In streets that contain 100% of homes of excellent quality that have been lovingly restored by conscientious owners, Central City zoning will mean a prescribed minimum of six storey apartment blocks, where no consideration need be given to light, sun or closeness to the boundary with regard to site coverage.</p> <p>These streets that represent an important part of Wellington's history will be transformed to something similar to The Terrace and the neighbourhood community destroyed.</p> <p>Land Ownership</p> <p>Although many of the houses may be large within the Hobson precinct the sites they sit on are small. Aside from the schools (Wellington Girls' College, Queen Margaret College and Thorndon School) the remaining land in this area is very limited in terms development potential.</p> <p>The land is predominantly held in small individually owned residential parcels. Many of the properties with back sections reflect the residential housing intensification that happened in the 1930s when the original large sections were developed with cross-titles. The average single dwelling properties in the Hobson precinct are under 500sqm.</p> <p>The sections are unsuitable for large scale development, although as already stated there have been townhouse multi-unit residential developments in the precinct, as allowed for in the Medium Density Residential Zone, that have been suited to the make-up and character of the existing properties and the land ownership.</p> <p>Centre City Zone development, given the size of the sections is not a reality for the Hobson precinct. The type of intensification that would be realistic in the Hobson precinct, with its 500sqm section size, is the Medium Density Residential Zone.</p> <p>Recycling, Repurposing and Intensifying:</p> <p>As already stated, intensification of the area happened in the 1930s with back sections developed from the large grounds of the early homes. The homes themselves have gone through several cycles, and this has been testament to their quality. They have been recycled and repurposed in the recent past – post war up until the 1970s many of the homes were converted into multi apartment dwellings.</p> <p>This may well happen again with the rise of cooperative living – people may well convert large homes back into places to be shared by two or more families.</p> <p>These families are not looking for high-rise apartments, but rather the spaces and access provided by 2-3 storey homes where they can raise families and share resources: The character area a big part of the appeal.</p> <p>The Suitability of the infrastructure:</p>				
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			<p>The water and other infrastructure requirements of large 6+ apartment buildings could not possibly be met without significant expenditure by Council. Zoning to Central City Area is unrealistic in the medium to long-term.</p> <p>The “Wellington City Council – 3 Waters Assessment” (March 2021) puts...</p> <p>The excessive cost to meet infrastructure requirements is a significant impediment to intensification in the Hobson precinct.</p> <p>These factors affect the estimated uptake of development and Council’s ability to consider significant development in the Hobson precinct as “infrastructure ready” or “feasible and reasonably expected to be realized” under the National Policy Statement on Urban Design (see the section below on Political Motivation).</p> <p>This is another reason why there is no likelihood of significant development of the nature of the Central City Zone, and reinforces the lack of evidence to support such a zoning.</p> <p>Seismic Resilience:</p> <p>Given the proximity to the Wellington faultline, and the experience provided by the 2016 earthquake that saw several high rises on Murphy Street, and Aitken Streets condemned, it seems extraordinary that this precinct should be ear-marked as City Centre and a prerequisite for 6+ story apartment buildings placed in this neighbourhood.</p> <p>The appropriateness of this kind of development in an area so close to the fault-line is heavily in question. It is a fact that low-rise wooden structures do inordinately better when situated on or near a fault-line. Again, this makes Medium Density Residential housing much more appropriate for the Hobson Precinct.</p> <p>Political Motivation:</p> <p>Following consultation on the draft Spatial Plan, the Council planners recommended that the Hobson precinct NOT be zoned Central City and instead be zoned (the equivalent of) Medium Density Residential Zone' and that character recognition and protection be applied to a subset of the precinct.</p> <p>For the Council to arbitrarily reject this advice for political reasons and revert to zoning the area Central City does not reflect the evidence and place-based town planning approach needed if Wellington is to retain its charm, character and vibrancy. Instead, it creates a real risk of opportunistic development creating a cityscape that meets their commercial imperatives rather than attention to a comprehensive urban design that takes into account character, liveability and community while also creating more housing.</p> <p>The result will be the loss of an area of Thorndon considered by many to be an architectural and historical gem. A justification for this extreme position has been the National Policy Statement – Urban Development 2020, however this policy statement does NOT require that the Hobson precinct be zoned as Central City. The requirements of the National Policy Statement – Urban Development are met if the Hobson precinct is zoned Medium Density Residential.</p> <p>WCC’s Planners advice...</p>				
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				<p>Draft District Plan Zone Definitions...</p> <p>It is my submission that correct application of the Draft District Plan definitions requires that the Hobson precinct be included in the zone that most accurately describes it, which is the Medium Residential Density Zone.</p> <p>Hobson Precinct as an "Area of Change" ...</p> <p>It is my submission that the Hobson precinct has none of the factors identified in this document as characterising an Area of Change and given that the only place-based planning that has occurred since this document's publication resulted in the Council Planners recommending that the Hobson precinct NOT be zoned City Centre, the area cannot be rightly considered an Area of Change appropriate for inclusion in the Central City Zone. As such, the area should retain residential zoning.</p> <p>IN SUMMARY:</p> <p>It is my submission that the proposed re-zoning of the Hobson precinct as Central City zone is unjustified and risks a great deal for no tangible gain. Appropriate intensification and protection of this important area can be achieved by reinstating the Council planners' recommendations to zone the area Medium Density Residential with character protection.</p> <p>Such a radical and unconsidered change to a precinct should not be undertaken as a cookie cutter exercise of applying straight lines to a Google map or to adopt a political ideology "intensification at all costs", without consideration of impact and evidence of benefit.</p> <p>A place-based approach to town planning demands that due regard be given to the unique nature of an area and requires that questions be asked like "Is this change appropriate?", "What will the city/this area gain from the change?", "What does the city/this area risk losing as a result of this change?". This sort of evidence-based process resulted in the Council planners removing the Hobson precinct from the Central City zone and recommending it be zoned Medium Density Residential with character protection where appropriate, this followed the extensive consultation process that has now been made a mockery of.</p> <p>It is my submission that not only does the National Policy Statement – Urban Design not require that the Hobson Precinct be zoned Central City, the objectives of the Policy Statement are more likely to be achieved by zoning the Hobson precinct as Medium Density Residential, as intensification of the type envisaged for that zone is a more realistic prospect for this area.</p>		
<b>Hobson Street Rezoning to MDRZ</b>	Helen Heffernan	786.1	Rezoning of Thorndon	<p>Threat to Thorndon's heritage areas and residential character</p> <p>I believe the measures being proposed in the draft district plan will result in the inevitable and irrevocable loss of Thorndon's heritage and residential character. The whole MDRZ regime, premised on promoting intensification and new residential development, will deliberately and methodically dismantle all existing measures which have worked to maintain Thorndon's heritage and residential character. I totally oppose in-fill and multistorey (4-6 stories) developments in Thorndon where such developments will result in loss of sunlight for 1-2 storey neighbouring houses. Given climate change, it seems incredible that the Council would promote policies that will result in people needing to use more energy to warm their homes because neighbouring multistorey new builds, that block sunlight, have been allowed and even promoted.</p>		

				<p>Specifically, I object to:</p> <ol style="list-style-type: none"> <li>1. The proposed Thorndon heritage area covering significantly less than the area covered by the existing Thorndon Character Area with the reduced heritage area equating to the area as it was first defined in the 1970s. At the last review of the District Plan, the boundaries were extended north to the motorway intersection opposite Harriett St and along the west side of Tinakori Road. The boundaries shown in the Operative District Plan should be retained.</li> <li>2. Any removal of the pre-1930s demolition controls.</li> <li>3. The whole of Thorndon east of the motorway being rezoned as Central. Thorndon has already sacrificed large tracts of land and former residential streets to commercial activities. It appears that the central zoning has been proposed in the misguided belief that it will promote residential development when there is nothing in the City Centre zoning to require the provision of new housing.</li> </ol> <p>The Council does not need to destroy Thorndon's unique heritage and character to provide additional housing in inner suburbs. This heritage is visited by many visitors to Wellington each year. There appears to be ample underutilised land in inner city areas, such as Te Aro, Adelaide Rd and Thorndon Quay, where carefully designed and planned multistorey housing could be developed. I support such development, specifically as has been proposed by LIVE WELLington.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Rob Taylor	986.1	Rezoning of Thorndon	<p>...</p> <p>The draft plan, particularly as it relates to Thorndon, is short sighted lacks vision. There are better options for accommodating growth, which enable appropriate intensification of land use without sacrificing the inevitable and irrevocable loss of Thorndon's heritage and residential character. The large number of historically and architecturally significant houses, established greenery and permeable surfaces would be lost if CCZ were to proceed. The Council has only to recall the 1973 destruction of a large part of Thorndon for the construction of Wellington's Urban Motorway if they wish to reflect on bad urban planning. The proposed change will repeat this mistake.</p> <p>Following consultation on the draft Spatial Plan, the Council planners recommended that the Hobson precinct not be zoned CCZ and instead be zoned (the equivalent of) Medium Density Residential Zone "MRZ" and that character recognition and protection be applied to a subset of the precinct (see "WCC planners' advice"). For the Council to arbitrarily reject this advice for political reasons and the obvious influence of developers and revert to zoning the area CCZ ignores best-practice models for good urban development and regeneration.</p> <p>As we have experienced in the past, by zoning of Thorndon as CCZ will inevitably lead to a range of ills including:</p> <ul style="list-style-type: none"> <li>• Loss of streetscape, identity, and community. Over time CCZ zoning will result in heritage and character housing in the area and the small collection of parks being replaced by the form of commercial development now seen on Molesworth Street and along Thorndon Quay. While character precincts are proposed which purport to maintain character in identified areas, the land costs and the lack of an open planning/consent process will lead to the inevitable construction of cheap in-appropriate townhouses and apartments. There will be little if no consultation by Council as to what gets built in the area as is already</li> </ul>			

			<p>evidenced by a number of recently approved high rises under construction (i.e., 172 Thorndon Quay). The Council conducts many of its planning/consent process by stealth and often works in the direct interests of developers with vested interests and links to existing Council members.</p> <ul style="list-style-type: none"> <li>• Elderly and those who cannot afford it will deliberately be forced out by substantive rate hikes and council regulation making it easier for developers to move in.</li> <li>• Historical buildings become surrounded by high rises as we have already seen for example, Old St Pauls and Pipitia Marae.</li> <li>• Substantive environmental impacts. We are already seeing with the construction of eleven story building along Thorndon Quay and Molesworth St high rise barriers between the city and the sea. Other impacts will include, light degeneration, the loss of trees and green spaces, wind tunnelling, noise from constant construction, traffic and further congestion – Thorndon has very few arterial routes, loss of residential car parking, and a significant increase and tax on infrastructure and utilities. Wellington is already seeing the results of years of neglect in sewage, water and power reticulation and the impact of intensified housing.</li> <li>• The construction of high-rise apartments and medium density housing on land unsuitable for development. Recent major earthquakes in Wellington have once again demonstrated the risks of building medium to high rise development within Thorndon which following the last earthquake has seen no less that eleven major buildings red-stickered. It is ironic that the Council's own website contains the following comment: "Over the past year we have been investigating and updating our information on natural hazards in Wellington. This work has been vital for informing the Draft District Plan and we are now proposing a much more proactive approach to preparing and dealing with natural hazards in our city." Despite that comment, the Council continues to grant licenses to build on reclaimed land subject to liquefaction and tsunami risk.</li> </ul> <p>Good planning</p> <p>Designing a good environment suitable for housing intensification ought not to be about simply building three to six times as many houses on any given site as the draft district plan suggests. It is about having a vision as to what a city should look like in the future.</p> <p>Higher density housing, if it is to be successful will require a much higher level of planning, design input and public consultation as to what represents good than currently envisioned by the Councils 'do as we say' approach. While they purport to be undertaking a consultation process, evidence suggests, as we have already seen with the changes in the plan, a matter of simply going through the motions.</p> <p>The current make-up of the Council also gives little confidence that they will listen. While they wish to be seen promoting their 'environmental' credentials, the reality is vastly different. As opposed to taking a regeneration approach to urban development, their vision is to simply look at what surrounds the Railway Station as their way forward.</p> <p>There are significant areas of underutilized land in Wellington and areas of run-down commercial space, that would benefit from and allow large scale intensification to take place in a harmonious and considered way. This would constitute repurposing existing buildings, developing complementary green spaces and resulting in improvement to areas that currently contribute little or indeed have a negative impact on the existing urban landscape.</p> <p>With greater investment in rail links which offer cheaper urban transport options, planners could also look further afield to develop new purposebuilt communities. There are substantive areas of land around townships such as Greytown or Carterton which are close to a major rail link. You</p>			
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				<p>don't need to pull a city apart and generate many of the ills which come with urban intensification to create the 60,000 to 80,000 additional houses Wellington needs over the next ten years. What is required is a stronger vision than currently contained in the present draft District Plan. If the Council's vision is to place areas such as Thorndon into the Central City zone for reasons which lack both substance or sense, we will as a community continue to struggle with the multitude of problems we currently face as a city, including a lack of a viable plan, little or no investment in infrastructure or the creation of jobs, and a Council with little or no vision subject to constant infighting.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Rhys Weyburne	1009.1	Rezoning Thorndon	<p>The Draft District Plan has the Hobson precinct included in the City Centre Zone. It is my submission that this zoning should be amended to the zoning recommended in the Officer Recommended Spatial Plan (also known as the "Pre-approved Spatial Plan 2021"), i.e. to the Medium Density Residential Zone with character protection as noted in that Spatial Plan.</p> <p>While it may be convenient from a straight lines perspective to connect the Thorndon area east of the motorway to the City Centre Zones on Mulgrave Street and Thorndon Quay, it misses the point that there are no commercial or industrial activities in the area currently.</p> <p>If this zoning change goes ahead it is inevitable that, over time, the houses will be demolished to be replaced by blocks of flats. As soon as one apartment block is built the domino effect will begin as the overshadowed neighbours sell. Before too long a lovely part of Wellington will be gone. It is not as though there are not large areas of underutilised land in Wellington that would allow for intensification. It seems a shame to wreck a part of Wellington that isn't broken.</p>			
<b>Maximum Building Height Standard</b>	United States Embassy – Chris Pritchard	89.1	CCZ-S1	<p>The Embassy wishes to make a submission on rezoning of the area in which the Embassy is located, as the Draft District Plan proposes to rezone the area from an "Inner Residential Zone" (as zoned by the Operative Wellington District Plan) to a "City Centre Zone". In particular, the Embassy opposes both the increase in height limits, and the minimum heights for new buildings proposed for the land that is adjacent to the Embassy.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Mary Graham	832.1	Rezoning of Thorndon	<p>Thorndon: there is no reason to move the city side of Tinakori Rd into the CBD. There is nothing to be gained; the CBD does not need to expand. Hobson St contains some of Wellington's most historical/heritage housing, which to a large extent have been lovingly maintained by their owners. I realise it is seen as elitist or a symbol of colonialism by some, but it still a lovely restful part of the city that should be protected. The pipes are old, it is earthquake prone, there are embassies and schools. Throwing multi-storeyed buildings into this area will simply destroy it, for no reason.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Denise Almao	652	Rezoning of Thorndon	<p>My concerns with the Draft District Plan are centred on the following three issues:</p> <p>...</p> <p>C. The residentially zoned land east of the motorway should NOT be re-zoned as City Centre.</p> <p>The proposed Medium Density Residential Zone (MDRZ) seems intended to promote intensification and new residential development and would in my view, methodically dismantle all existing measures which have worked to maintain Thorndon's heritage/residential character.</p>			

				<p>The historic streets and housing of Thorndon are also key visitor attractions used to promote Wellington, including by Wellington City Council. The suburb is visited and appreciated by both New Zealanders and international visitors...</p> <p>An increase in density can be, and is being achieved, without repeating the mistakes of the past and allowing multi-story buildings to crowd out the existing character stock and undermine the character of the area.</p> <p>I am not against more housing or more affordable housing in Wellington, but such development should be phased, so that it first takes place in areas which need regeneration eg Adelaide Road and from Kent Terrace through to Willis Street. In these areas the effect of multi-storey apartments can be blended with other similar buildings.</p> <p>C I am opposed to the proposal to re-zone as City Centre all existing residentially zoned land east of the motorway (eg Hobson Street, Portland Crescent and Selwyn Terrace). To date no compelling evidence or justification has been produced to support the need for extending the City Centre zoning to the boundary of the Urban Motorway. I support the position of the Thorndon Society that there is more than sufficient City Centre land to provide for future needs over the life of the Plan without impinging on the residential areas of Thorndon.</p> <p>It appears that the zoning has been proposed in the misguided belief that it will promote residential development when there is nothing in the City Centre zoning to require the provision of new housing.</p> <p>The Council's own planning assessment work also confirms that there is a high percentage of quality residential development in the existing residential enclaves sufficient to sustain the protection of these areas as a qualifying matter under the National Policy Statement-Urban Development. I endorse the view of the Thorndon Society and the Thorndon Residents' Association that the proposed City Centre zoning over existing residential areas in Thorndon be withdrawn and that the Council work constructively with the community to seek acceptable planning solutions.</p>			
<b>Hobson Street Rezoning to MDRZ</b>	Brian and Minako O'Hagan	672	Rezoning of Thorndon	<p>As longstanding Thorndon residents we would like to register our strong objections to the proposal in the Draft District Plan to include the area encompassing Hobson St, Hobson Crs, Fitzherbert Tce, Katherine Avenue and Turnbull Street, eastern side of Murphy St, Pipitea St and Moturoa St in the City Centre zone. We feel that it should be zoned as Medium Density Residential Zone with character protection, as recommended in the Officer Recommended Spatial Plan.</p> <p>This small and historic part of Thorndon includes schools and child-care centres (with significant green space), embassies and residential buildings, both stand-alone classic homes and newer town houses and apartments, all maintained to an excellent standard. It is a safe area within walking distance of the city centre, parliament, shops, a swimming pool, and several historic places.</p> <p>Re-zoning as City Centre will almost inevitably mean the loss of historical and architecturally significant homes along with schools and their playing fields and natural environment. Remaining homes will lose sunlight and find themselves surrounded by office blocks and other business premises, and with reduced green space. As a consequence, the quality of life of the residents in this area will be significantly degraded.</p>			

				We can see no justification for the proposed rezoning, as there are other areas of land in Wellington that would allow City Centre intensification without causing destruction of an established residential area of notable heritage value. We therefore ask that the Council please reconsider this unpopular proposal.			
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Peter David Preston	463.1, 108.1	N/A	<p>Although the area around Kent Terrace, Home and Hania Streets is a logical area for further development, given its proximity to the city and currently low-rise semi-industrial usage, incorporating it into the Central City zone allows for buildings 28.5 metres high without a resource consent. This could result in a high wall of buildings blocking Mt Victoria from the city.</p> <p>A better approach would be to treat this as a transition zone between city and the suburb. On 3 September 2020, the Mt Victoria Planning Group presented an outline to a Mt Victoria residents public meeting which would see a very large increase in dwellings along Kent Terrace, but with density done well for such a medium density residential zone.</p>			<p><b>No change.</b> CCZ for Kent Terrace is to be retained, as it is in the Operative District Plan. Kent Terrace is more fitting with CCZ zoning and activities than the now High Density Residential Zone. Already under the Draft Plan the heights have been stepped down from 42.5m in Te Aro to 28.5m on Kent Terrace. So there is a reduction of height from higher Te Aro heights.</p> <p>6 storey heights are enabled along Mount Victoria under the High Density Residential Zone provisions. This is a 2 storey height difference between the CCZ's 28.5m and HDRZ's 21m height.</p>
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Tracey Paterson, Karen Wong	29.1	N/A	<p>The draft District Plan rules will fail to protect the character and heritage values of Moir St and do not align with the objectives and policies of the plan which seek to protect the important character and heritage areas and values of the City from inappropriate development and design. The rules will also not encourage or enable development in line with the draft Heritage design guides, in particular policies G8-G12.</p> <p>This is due to the draft rules for the Central City Zone (CCZ) on the eastern side of Hania St allowing very high buildings (up to 28.5m high) directly to the rear of the homes on Moir St. The outcome would be a wall of 8 storey builds directly overlooking and dominating 1-2 storey cottages.</p> <p>Such development would have a significant adverse effect on the character, heritage and amenity of houses on both sides of Moir St. This includes loss of sunlight, overlooking, shading, wind, over-dominance of building form and loss of privacy.</p> <p>The draft district plan needs to acknowledge and respond to this very sensitive boundary transition in order to avoid detriment to the heritage and character area of Moir St.</p> <p>A similar principle also needs to be applied at the interface of the CCZ and MDRZ.</p> <p>The draft District Plan rules fail to take into account adequately new information now available regarding the Aotea fault, and in particular the impact of the thicker layers of sediment on proposed building structures in the Kent Terrace and Hania St areas.</p> <p><b>Grounds for amendments required to draft District Plan</b></p>			<p>No change as above to CCZ edge zone heights. 6 storey heights are enabled along Mount Victoria under the High Density Residential Zone provisions. This is a 2 storey height difference between the CCZ's 28.5m and MDRZ's 21m height. Sunlight modelling is underway to model these effects.</p> <p><b>Change made to CCZ-05.</b></p> <p><b>No change</b> to CCZ-P5 as this is addressed in CCZ-P10.2.</p> <p><b>Change made</b> regarding CCZ-S3, the standard will be changed to apply to Character Precincts and Heritage Areas to capture the intent of the proposed new rule in the submission point.</p> <p>There is a sloping topography from Kent Terrace upwards which makes the properties in Moir Street etc.</p>

			<p>Amendments are required to the draft policies and rules as well as new rules are required for the CCZ. This would only have impacts on small number of properties on the eastern side of Hania St adjacent to Moir St. The changes proposed will help to ensure an appropriate level of development which respects and responds to the character and heritage value of Moir St.</p> <p>The amendment required will help ensure that the CCZ rules align with the policies and objectives of the plan and draft heritage design guide. These seek to protect the important heritage and character values of the City.</p> <p>In relation to the CCZ there is an overall policy goal to ensure there are "...measures to manage activities and development that have the potential to adversely affect public and private amenity or to create reverse sensitivity effects, including along the boundary with adjoining residentially zoned areas...".</p> <p>The draft plan includes policies CCZ-07, CCZ-P10 and CCZ-P13 which specifically seek to ensure adverse effects from scale and dominance of new buildings are managed in the CCZ where this zone interfaces with heritage areas and with residentially zoned areas. To give effect to this intent, the following amendments are required to the draft policies and rules:</p> <p><b>Amendments - the draft plan should be amended as follows:</b></p> <p>It is not clear to me how best to amend the district plan to take into account the sediment issue. I will leave this to geo-technical advice from the appropriate engineers.</p> <p><b>Amend</b> Policy CCZ-05: Sub-clause 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to tangata whenua.</p> <p>Policy CCZ-P5: <b>Add</b> new sub-clause 3: "Ensuring an appropriate scale of development where the CCZ interfaces with heritage areas and residentially zoned areas"</p> <p>Rule CCZ-S3. <b>Amend</b> rule to state</p> <p>Identified character precinct:</p> <p>For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p>Add <b>new rule</b> (to follow CCZ-S3).</p> <p>CCZ-SX – Heritage Areas in MDRZ – adjoining site specific building height Identified heritage area:</p> <p>For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p><b>Amend</b> rule CCZ-S5 Minimum height to ensure compliance with changes above.</p> <p><b>Other matters</b></p>			<p>Higher and reduces the impact of the edge treatment somewhat. However, Council has listened to concerns and given that Moir Street is the only character precinct which abuts the City Centre Zone Council considers that it is appropriate to reduce the recession plane height from 12m to 8m. This also aligns with the approach taken in the High Density Residential Zone for sites adjacent to Character Precincts where Council has reduced the height of the recession plane. It is appropriate that the height for the City Centre Zone is 3m higher than the Height of the High Density Residential Zone because the zones have different purposes, density expectations and NPS-UD direction.</p> <p><b>Amend CCZ-O5 sub-clause 7 as follows:</b></p> <p>7. Acknowledging and sensitively responding to adjoining heritage buildings, <u>heritage areas</u> and areas and sites of significance to tangata whenua.</p> <p>Amend CCZ-S3 as follows:</p> <p><b>CCZ-S3 Character Precincts and Heritage Areas – Adjoining Site Specific Building Height</b></p> <p>Identified <u>character</u> precinct <u>and Heritage Area</u>:</p> <ol style="list-style-type: none"> <li>1. For any <u>site</u> adjoining a <u>site</u> identified within a <u>Character</u> Precinct <u>or Heritage Area</u>: no part of any <u>building, accessory building</u> or <u>structure</u> may project beyond a line of 60° measured from a <u>height</u> of <del>12m</del> <u>8m</u> above <u>ground level</u> from all side and rear boundaries that adjoin that precinct.</li> </ol>
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				<p>Moir St / Hania St is one of the lowest areas of Mt Victoria. We suffer from flooding and sewerage overflows in heavy rain events. Before any significant development is enabled along Hania St sufficient stormwater / waste water capacity will be required.</p> <p>Moir St is a very narrow 19th century one laned road which acts as a shared space and transport route for walking, bikes, scooters and cars. This road has no capacity for additional residential car parking or traffic. Any new development in the area (including Hania St) will need careful controls on allowance to on-street parking permits.</p>			
<p><b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b></p>	<p>Karen and James Fairhall, Karen Wong</p>	<p>907.1, 289.1</p>	<p>N/A</p>	<p>The draft District Plan rules will fail to protect the character and heritage values of Moir St and do not align with the objectives and policies of the plan which seek to protect the important character and heritage areas and values of the City from inappropriate development and design. The rules will also not encourage or enable development in line with the draft Heritage design guides, in particular policies G8-G12.</p> <p>This is due to the draft rules for the Central City Zone (CCZ) on the eastern side of Hania St allowing very high buildings (up to 28.5m high) directly to the rear of the homes on Moir St. The outcome would be a wall of 8 storey builds directly overlooking and dominating 1-2 storey cottages.</p> <p>Such development would have a significant adverse effect on the character, heritage and amenity of houses on both sides of Moir St. This includes loss of sunlight, overlooking, shading, wind, over-dominance of building form and loss of privacy. The draft district plan needs to acknowledge and respond to this very sensitive boundary transition in order to avoid detriment to the heritage and character area of Moir St.</p> <p>A similar principle also needs to be applied at the interface of the CCZ and MDRZ. Grounds for amendments required to the draft District Plan Amendments are required to the draft policies and rules as well as new rules are required for the CCZ. This would only have impacts on a small number of properties on the eastern side of Hania St adjacent to Moir St. The changes proposed will help to ensure an appropriate level of development, which respects and responds to the character and heritage value of Moir St.</p> <p>The amendment required will help ensure that the CCZ rules align with the policies and objectives of the plan and draft heritage design guide. These seek to protect the important heritage and character values of the City. In relation to the CCZ there is an overall policy goal to ensure there are "...measures to manage activities and development that have the potential to adversely affect public and private amenity or to create reverse sensitivity effects, including along the boundary with adjoining residentially zoned areas...".</p> <p>The draft plan includes policies CCZ-07, CCZ-P10 and CCZ-P13, which specifically seek to ensure adverse effects from scale and dominance of new buildings are managed in the CCZ where this zone interfaces with heritage areas and with residentially zoned areas.</p> <p>... [See above amendments].</p>			
<p><b>Zone edge of Kent Terrace Mount Victoria, Medium</b></p>	<p>Sam Vennell</p>	<p>1074.1</p>	<p>N/A</p>	<p>The edge of Kent Terrace should not be rezoned to City Center – perhaps a compromise could be reached by changing it to Medium Density Zone which transitions between the city and suburb.</p>			

<b>Density Residential, not City Centre</b>							
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Jane Szentivanyi & Ben Briggs	1077	N/A	<p>Transition between City Centre Zone and Medium Density Residential Zone</p> <p>As the Central City Zone (CCZ) allows for buildings 28.5 metres high without a resource consent consideration needs to be given to the impact this would have on adjacent suburbs. There is a need for a transition zone between the CCZ and adjoining Medium Density Residential Zones (MDRZ).</p> <p>For example, incorporating the area Kent Terrace, Home and Hania Streets into the CCZ could result in a high 'wall' of buildings blocking Mount Victoria from the city. A better approach is to treat this as a transition zone between the city and the suburb, allowing medium density development (up to 6 storeys) in this zone – this would be achieved if it remains part of the suburb of Mount Victoria.</p> <p>The logical boundary for the Central City at its extreme eastern edge is Cambridge Terrace. The green boulevard between Cambridge and Kent Terraces historically and geographically marks the most appropriate transition from city building heights to residential suburb. The boundary for the official, New Zealand Geographic Board-defined suburb of Mount Victoria is down the middle of Kent and Cambridge Terraces, with Kent Terrace firmly within the bounds of Mount Victoria<sup>1</sup>. We submit that the line down the middle of Kent and Cambridge Terraces is made the Mount Victoria suburb boundary to allow a sympathetic transition from the CCZ to MDRZ in Mount Victoria. <sup>1</sup> <a href="https://gazetteer.linz.govt.nz/place/31852">https://gazetteer.linz.govt.nz/place/31852</a></p>			
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Jane O'Loughlin	1109.1	N/A	<p>Mt Victoria boundary</p> <p>The draft District Plan has the area around Kent Terrace, Home and Hania streets as part of the central city zone. This allows for buildings 28.5 metres high without a resource consent, and could result in a high 'wall' of buildings blocking Mount Victoria from the city.</p> <p>This area is very suitable for development, however a better approach is to treat this as a transition zone between the city and the suburb, allowing medium density development (up to 6 storeys) in this zone – this would be achieved if it remains part of the suburb of Mount Victoria.</p> <p>Ø I submit that the edge of Kent Terrace should be zoned Mount Victoria Medium Density Residential Zone, not City Centre.</p>			
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Patricia Briscoe	1130.1	N/A	<ul style="list-style-type: none"> <li>The edge of Kent Terrace should be zoned Mount Victoria Medium Density Residential Zone, not City Centre.</li> </ul> <p>While the area around Kent Terrace, Home and Hania streets is a logical area for further development, given its proximity to the city and currently low-rise semi-industrial usage, incorporating it into the Central City zone allows for buildings 28.5 metres high without a resource consent. This could result in a high 'wall' of buildings blocking Mount Victoria from the city. A better approach is to treat this as a transition zone between the city and the suburb, allowing medium density development (up to 6 storeys) in this zone – this would be achieved if it remains part of the suburb of Mount Victoria.</p>			

				<p>The logical boundary for the Central City at its extreme eastern edge is Cambridge Terrace. The green boulevard of The Terraces historically and geographically marks the most appropriate transition from city building heights to residential suburb.</p> <p>The boundary for the official, New Zealand Geographic Board-defined suburb of Mount Victoria is down the middle of Kent and Cambridge Terraces, with Kent Terrace firmly within the bounds of Mount Victoria. This is supported by the Board's guiding principles:</p> <p>"The New Zealand Geographic Board Ngā Pou Taunaha o Aotearoa recognises the importance of locality and suburb names and their extents. . . .They [suburbs] are also important for government administration and provide identity and association for local communities – giving a sense of place and belonging.</p> <p>The Board also recognises that populated places are bounded by naturally defined geographic boundaries or infrastructures. . . . Having official suburb and locality names provides certainty, protects community identity, minimises the risk of incorrect naming, and ensures that the official name is used in official publications. . . .</p> <p>The Mt Vic Planning Group has previously provided an outline (presented to a Mount Victoria residents public meeting on 3 September 2020) which would see a very large increase in dwellings along Kent Terrace, but with density done well and appropriately for such a medium-density residential zone. This option would address more than the likely growth in demand for housing in this area, while preserving important character of great historical significance in the rest of Mount Victoria</p>		
<p><b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b></p>	Craig Forrester	576.2	N/A	<p>This submission is made in opposition to the draft District Plan rules pertaining to the Medium Density Residential Zone (MDRZ) areas and City Centre Zone (CCZ).</p> <p>This submission focuses on the impact of these rules in relation to Moir St, Mt Victoria. Our principal objection is not so much to the plan in general and its objectives, but specific parts of the plan which don't appear to apply with consistency such as with Moir St.</p> <p>The proposed plan as has been released has Character and Heritage covenants that protect Moir St (being within the Medium Density Residential Zone). That is great, however Moir St interfaces directly to a central area zone (CCZ) on the eastern side which allows buildings up to 28.5m high abutting to and towering over the character and heritage classified properties on Moir St. These buildings would be on Hania St in the CCZ.</p> <p>As the plan would allow in its proposed state, this would lay ground to an adjoining array of 8 or more storey buildings all the way down Hania St hard up against character and heritage properties.</p> <p>Currently there are several buildings on Hania St directly adjacent to Moir St properties that already compromise light and afternoon sun such as:</p> <ul style="list-style-type: none"> <li>· The Lexington apartments at 33 Hania ~ 4 levels (with basement) backing directly on to the properties of 11 through 17 Moir St</li> <li>· The building at 39-41 Hania ~ 3 levels backing immediately on to No's 5 and 7 Moir St</li> </ul>		

			<ul style="list-style-type: none"> <li>· The building at 45 ~ 3-4 storeys backing immediately on to No 3 Moir St</li> </ul> <p>The proposed plan would allow structures double the height of these existing buildings. Also taking into consideration the northern end of Moir St falls in gradient giving an even further towering affect from any buildings adjacent to them on Hania St.</p> <p>Allowing 8 storey buildings directly behind the Moir St properties would bring about severe loss of sunlight, increased shading, loss of privacy and an over-bearing structure imposing over residents at their back door.</p> <p>It seems conflicting to have character and heritage status for Moir St, but directly adjacent to it is in complete contrast. The draft plan includes policies CCZ-07, CCZ-P10 and CCZ-P13 which specifically seek to ensure adverse effects from scale and dominance of new buildings are managed in the CCZ where this zone interfaces with heritage areas and with residentially zoned areas.</p> <p>It is not a matter of being averse to having new higher and more dense developments in the CCZ, but rather something to ensure a graduation in height from a MDRZ to a CCZ, especially where the MDRZ also has character and heritage status. This would be in accord with the intent of these policies (CCZ-07, CCZ-P10 and CCZ-P13).</p> <p>My suggestion is the draft district plan needs to acknowledge and respond to sensitive boundary transition cases such as between Moir St and Hania St</p> <ol style="list-style-type: none"> <li>1. in order to avoid detriment to the heritage and character area of Moir St, and</li> <li>2. simply to enable softer transitions between boundaries where there are extreme differences in what is allowed to be protected and built within these boundaries.</li> </ol> <p>This acknowledgement can be via some further qualification added to policy and rules in the proposed plan which impact cases of a hard interface of CCZ and MDRZ zones. To give effect to this intent, amendments such as the following are required:</p> <ul style="list-style-type: none"> <li>· Amend Policy CCZ-05: Sub-clause 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to tangata whenua.</li> <li>· Add to Policy CCZ-P5: new sub-clause 3: "Ensuring an appropriate scale of development where the CCZ interfaces with heritage areas and residentially zoned areas"</li> <li>· Amend Rule CCZ-S3. To state o Identified character precinct: <ul style="list-style-type: none"> <li>o For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</li> </ul> </li> <li>· Add new rule (to follow CCZ-S3). <ul style="list-style-type: none"> <li>o CCZ-SX – Heritage Areas in MDRZ – adjoining site specific building height</li> <li>o Identified heritage area: <ul style="list-style-type: none"> <li>o For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary</li> </ul> </li> </ul> </li> </ul>			
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			<p>or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <ul style="list-style-type: none"> <li>· Amend rule CCZ-S5 Minimum height to ensure compliance with changes above.</li> </ul> <p>Having these further amendments and additions will give significant benefit to those cases where there is a hard MDRZ/CCZ boundary but not affect the wider region because there are so few areas in the region that face this potential dilemma.</p> <p>Other matters</p> <p>Greenspace</p> <p>The properties on the eastern side of Moir St form a corridor of a substantial amount of greenery with mature trees in an otherwise non-green, densely built-up and/or road covered area. This also provides a bird corridor extending from the basin reserve. On my own property there are many birds that occupy the trees at the back of the property or fly through to neighbouring properties and there is always a ring of birdsong. Higher buildings bearing over much of this treeline will have an adverse effect on the greenery currently in this corridor, principally due to shading.</p> <p>Following on this, there is a general lack of green space at the lower (eastern) end of Mt Victoria through to Te Aro (up to Cambridge Terrace). There are very small snippets of greenspace that offer very little for public use such as between the basin roundabout and the Lexington apartments (which is NZTA land and more in waiting for future road developments) and then there is the Basin Reserve, but it only has the banks available to the public and then only within certain hours and not accessible to the public when there are events on, so can't really be classified as a public usable green space.</p> <p>What would be ideal is to have some of Hania St designated as a public park area to compliment the green corridor that the eastern Moir St properties currently provide and provide some valuable green space for the intended increased population in this area that the proposed district plan is intending to promote.</p> <p>Geological concerns</p> <p>As more recent detail has emerged about the Aotea fault (refer Stuff article), we find this comes ashore at Chaffers Wharf, under Waitangi park and down along Kent Terrace – noting Hania St runs parallel at only a stone's throw away to Kent Tce.</p> <p>We also learn that the layer of sediment across most of Wellington is twice as thick as originally believed and as a result the earthquake risk in Wellington is a lot higher than originally believed. The Aotea fault has an estimated 6.3 to 7 magnitudes when it ruptures. Given the lower lying land from western Mount Victoria through Te Aro which encompasses Hania St, Kent and Cambridge terraces:</p> <ul style="list-style-type: none"> <li>· Is highly prone to liquefaction exacerbated by</li> </ul> <ul style="list-style-type: none"> <li>§ An underground water tributary from the basin reserve down to Chaffers Dock under Cambridge/Kent terraces, and</li> <li>§ Having a significant amount of reclaimed land at surface level, particularly Kent and Cambridge terraces, and</li> </ul>		
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				<p>§ Sediment layers twice as thick as originally believed</p> <p>· And to top it off, has a Faultline right below which has significant magnitude damage when rupturing it is questionable whether any structures over 3 storeys, especially residential where people can be residing 24/7, should be built in this vicinity at all.</p> <p>This gives further weighting to the previous suggestion that much</p>			
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Andrea Jewell	729.1	N/A	<p>Accordingly, the areas of Kent Terrace, Home Street and Hania Street should not be captured by the City Centre Zone, which would allow for buildings of up to 28.5 metres (8-storeys).</p> <p>If the Draft District Plan went ahead unchanged, this would mean that houses on streets including Moir Street, Brougham Street, Pirie Street and Roxburgh Street, where the maximum build height is 11 metres (or in some areas the maximum of 22 metres) would be right next to buildings up to 28.5 metres height - over 2.5 times bigger. This would have the effect of creating a "wall" of buildings blocking Mount Victoria from the city. This would be extremely detrimental to Mount Victoria as a suburb, significantly affect sunlight to residential buildings in the Medium Density Zone (and in particular in the Character Precinct) and the sense of connectedness of Mount Victoria to the City.</p>			
<b>Zone edge of Kent Terrace Mount Victoria, Medium Density Residential, not City Centre</b>	Matt Levine Alicia Blaikie	954.41	N/A	Seeks the rezoning of the edge of Kent Terrace to Medium Density Residential Zone, from City Centre Zone.			
<b>Bicycle and micro-mobility device parking requirements for commercial and community facilities</b>	A City for People - SamKate Douglass, Aaron Tily,	63.1, 65.1	Transport provisions	I support the new bicycle and micro-mobility device parking requirements for commercial and community facilities in the Centres and Mixed Use zones.			<b>No change.</b> Support noted. No response needed.
<b>Green space and public amenities in the Central City</b>	Matthew Plummer	951.1	N/A	Central Wellington's green spaces must be protected, in particular Waitangi Park and Frank Kitts Park. Development of these sites would further erode the livability of our central city, and these green spaces should be protected (e.g. gazetting) as a balance to the increasing number of people living and working in Central Wellington.			Concern noted. <b>No change</b> as there are strict rules and policy direction in the Open Space Zone and Waterfront Zone chapters preventing larger scale development on these parks. Council seeks to prevent development of an adverse nature on these parks.
<b>Green space and public amenities in the Central City</b>	Amber Smith	771	N/A	<p>Green spaces:</p> <p>I agree with the statements made in the info sheet on the impacts of design has on residents mental and physical health and wellbeing.  <a href="https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0020/17066/Quality-design-mental-healthwellbeing-info-sheet-WCC.pdf">https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0020/17066/Quality-design-mental-healthwellbeing-info-sheet-WCC.pdf</a></p>			<b>Some changes:</b>  The City Centre Zone encourages more green space in the city centre, both public and private green and outdoor space. This works with and

				<p>'There is a substantial evidence base that shows the built environment has a significant influence on human health and wellbeing. The built environment defines the spaces and places in which we live, work, and play and how we use, move around and interact with these spaces and places. Wellington's compactness and proximity to the natural environment are often cited as important features that support Wellingtonians' mental and physical health and wellbeing.'</p> <p>I see the opportunity for more green spaces to be linked with the pedestrianisation of our city and the car free CBD policy announced. As we endeavour to be car free in the CBD by 2025 I believe that green space should come hand in hand with pedestrianisation and should be prioritised.</p>			<p>aligns with Spatial Plan direction and the Green Network Plan.</p> <p>The Council does not intend for the Green Network Plan to be a statutory document instead it is a policy and guidance document. Including it in the District Plan via chapters or design guidance would change this intention.</p>
<p><b>Green space and public amenities in the Central City</b></p>	<p>Inner City Wellington (ICW) – voice of Te Aro and Wellington Central</p>	<p>450.1</p>	<p>We contend that while the speed of future population growth can be argued, the intensification of residential dwellings within the City Center Zone is current fact and a future certainty. ICW accepts that our inner-city neighbourhoods will continue to grow and be the city's most dense residential area.</p> <p>Therefore, ICW urges this Council to do everything in its power to ensure that the quality of the built environment that will encompass these rapidly growing inner city neighbourhoods contain all the public amenities necessary to support thriving, diverse, sustainable residential communities.</p> <p>ICW has consistently highlighted the reality that the existing level of public amenities available to what is already the largest residential community in the city, falls well short of an appropriate level, and that the current level of intensification already occurring is exacerbating the existing deficit in amenities available to inner-city residents living in 'vertical streets'.</p> <p>The actions or inactions of this Council in supporting how these rapidly growing inner-city neighbourhoods develop, with the amenities that are available to the thousands of people who don't leave the city to go home, will determine whether these neighbourhoods are places that families with children, our seniors, our key workers, the most vulnerable, our students, want to live in. That is what is at stake in this draft plan.</p> <p>ICW believe that this Council has the responsibility to do all in its power to ensure a future where our inner-city neighbourhoods are places where Wellingtonians want to live.</p> <p>The Warren Mahoney/Boffa Miskell report "Central City Spatial Vision" commissioned by WCC in 2020 states that "Te Aro park is approximately 1500 square metres (0.15 hectares) in area. Green space the equivalent to another 10 Te Aro parks would be required to meet the space needs of the new central city population. New spaces will need to be different from Te Aro Park to provide different user amenity value. There is also a deficit of space for existing residents of the central city which additional space should be provided for."</p> <p>In addition the report points out that the total available green space in Lambton (Wellington central) is 15.61 hectares but when hard surfaces which we contend should not be considered green spaces, are removed, this reduces to 12.74. In Te Aro the situation is dire NOW: 7.03 hectares total but only 4.73 hectares when hard surfaces are removed. (In our view there is now even more hard surface)</p> <p>ICW believes that the draft Green Networks plan, adopted on 27 October 2021, provides a comprehensive vision for the provision of green spaces, open spaces, and community spaces, necessary to correct the current deficit within the inner-city neighbourhoods, and provide for the</p>			<p>It is not the directive of the District Plan team to have Frank Kitts Park, Waitangi Park, Jack Illot Green gazetted under the Reserves Act.</p> <p>Regarding Paul M Blaschke amendments, Council agrees to add the references to 'green space'. However, not to the recommendation to include 'harbourside' references, as the Lambton Harbour Area is no longer included in the City Centre Zone and is now covered by the Waterfront Zone. Hence, harbour references have been moved to this chapter.</p> <p>Proposed changes:</p> <ul style="list-style-type: none"> <li>• Amend CCZ-02.4 as follows: Convenient access to a range of open space options <b>including green space</b>;</li> <li>• Amend CCZ-05.6 as follows: Protecting current areas of open space <b>including green space</b>;</li> <li>• Amend CCZ-P9.6 as follows: Diversity of accessible, well designed civic and public space <b>including green space</b>.</li> </ul> <p>Council is very aware of the deprivation of green spaces in the City Centre Zone, and Te Aro in particular. It's policy framework, standard CCZ-S11 and City Outcomes Contribution mechanism seeks to aid and increase the provision of open space in the Zone. It works in alignment with non-District Plan mechanisms like the Green</p>	

				<p>necessary increase in such spaces required to support a rapidly growing inner city residential community.</p> <ul style="list-style-type: none"> <li>• ICW IS GRAVELY CONCERNED that neither the city centre zone or the centres and mixed-use design guides provide any explicit reference to the Green Network Plan.</li> <li>• ICW MAINTAINS that, for the Green Network Plan to influence planning decisions, it must be directly referenced within the city centre zone, and the centres and mixed-use design guides.</li> </ul> <p>We cannot see how Council in good conscience can advocate unconstrained intensification in the inner city at the same time as claiming the reality of fiscal constraints in the provision of the necessary infrastructure required to support such intensification.</p> <p>You cannot uncouple intensification of residential development from the provision of the appropriate level of community amenities required to support the people who will live there.</p> <p>Whether or not in the future our inner-city will support, along with business, hospitality and entertainment, the socially, economically, and generationally diverse residential communities that are the hallmark of successful residential inner-city neighbourhoods across the world depends on Council's willingness to make some challenging decisions that will deliver development with necessary infrastructure and amenities to support the diversity necessary for those communities to thrive.</p> <p>This Council has the responsibility to do all in its power to ensure a future where our inner-city neighbourhoods are places where Wellingtonians want to live</p>			Network Plan and Council investment in public spaces. The District Plan cannot be the only tool.
<b>Green space and public amenities in the Central City</b>	Greater Brooklyn Residents Association Inc (GBRAI)	637.1	N/A	<p>The central city is 56 tennis courts worth of green spaces short with the current population.</p> <p>As part of this process, the GBRAI would like to see specific green areas identified now and created rather than later when it is too late.</p> <p>We would like to see Frank Kitts Park, Waitangi Park, Jack Illot Green gazetted under the reserves act as green spaces.</p>			
<b>Green space and public amenities in the Central City</b>	Ralf Schwate	699.1	N/A	<p>The city centre zone needs green spaces and care should be taken around the waterfront and other council owned spaces. Doesn't oppose commercial spaces (e.g. cafes, shops) or residential spaces (affordable housing owned by Council ) in Waitangi or Frank Kitts Park.</p>			
<b>Green space and public amenities in the Central City</b>	Paul M Blaschke	744.13	CCZ-02.4, CCZ-05.6, CCZ-P9.6, CCZ-P12	<p>The purpose of the central city zone as a commercial and employment centre is accepted, but nevertheless it is also a large and rapidly growing residential area, and as such must satisfy the housing, amenity and wellbeing needs of its residents and visitors.</p> <p>These include adequate and accessible open space including green space. Green spaces also provide many resilience services including nature-based adaptation to some climate change effects and spaces to respond to natural disasters. These matters are all excellently dealt with in the Green Network Plan.</p> <p>Adequate open space including green space should be specified in several objectives including CCZ-02.4 ("Convenient access to a range of open space options including green space"); CCZ-05.6 ("Protecting current areas of open space including green space and harbour access");</p>			



				CCZ-P9.6 ("Diversity of accessible, well designed civic and public space including green and harbourside space" ). This is especially relevant in CCZ-P12 recognising the contribution of green and harbourside space to city outcomes including resilience; in this case the provision of green or harbourside space could be significant enough to warrant a separate mention viz: 1ai Vesting and/or restoring a portion of the site as public green or habourside space for the use and enjoyment of the public". Incentives or development rights can be useful ways of balancing good environmental outcomes with development or densification objectives. A basic principle is that development needs in this and other city zones need not and should not come at the expense of environmental quality and especially at the expense of loss of green space, large amenity trees (whether Notable Trees or trees on public spaces) or streams/natural waters.			
<b>Green space and public amenities in the Central City</b>	Wellington Civic Trust – Jim McMahon	875.1	N/A	<p>Adequate central city green space network</p> <p>It is very clear from looking at the Plan Maps (and from previous investigations undertaken by the Council – e.g. the recent Green Networks Plan) how impoverished the City Centre Zone is in terms of open space. The Civic Trust examined this issue in its “Avenues and Oases” Seminar in 2014 and if anything the situation had worsened since then with the increased and increasingly poorly-served population of the Central City. It is not good enough for the Council to try to rely on developments and developers to volunteer or be incentivised to provide small green spaces, or to convert small street spaces into green sitting areas.</p> <p>We do not see why the Council cannot use the District Plan to designate new complementary green spaces for central Wellington. This would seem quite possible under both the Public Works and Resource Management Acts. It would provide certainty for intensification proposals and can be funded for development levies. It is essential to include this framework within the District Plan if the Council is to have any credibility in terms of the open space needs of present and future generations.</p>			
<b>Green space and public amenities in the Central City</b>	Craig Forrester	576.1	General	<p>Eastern Te Aro better designated park/recreational space?</p> <p>There is a lack of green space at the lower (eastern) end of Mt Victoria through to Te Aro (up to Cambridge Terrace). There are very small snippets of greenspace that offer very little for public use such as between the basin roundabout along Dufferin St (which is NZTA land and more in waiting for future road developments). The Basin Reserve only has non-flat banks available to the public and not all hours.</p> <p>This will become more significant given the principal objective of the spatial plan is to have more people accommodated in the city (including families) and a heightened need to have access to such public green spaces.</p> <p>The land from the Basin Reserve down Kent/Cambridge terraces is low lying, has underground water tributaries, has a recently identified fault line beneath (Aotea fault, refer Stuff article) and has a sediment layer twice as thick as previously believed. It is questionable whether the land in this corridor should be used for any residential accommodation of high-rise nature</p> <p>Given the current lack of green space in this region and the geological unsuitability of the land for high rise structures, having a tract of land down the corridor of Hania St and Kent Terrace instead designated as public park space (including play area for kids) would be an ideal classification for this land. It would also fit in as an improved corridor for pedestrians and cyclists bridging from the northern of the Basin Reserve.</p>			

<p><b>Request to make land at 153 Cuba Street a public park</b></p>	<p>Garth Baker, Greater Brooklyn Residents Association Inc (GBRAI)</p>	<p>531.1, 637.1</p>	<p>CCZ-05; CCZ-P11</p>	<p>I urge the WCC to purchase the land at 153 Cuba St for a public park. [Diagram of DDP maps included]. The arguments for WCC to purchase and development a green park are:</p> <p>The established need for parks:</p> <ul style="list-style-type: none"> <li>The many benefits of urban parks are detailed in WCC's Green Space in Wellington's Central City: Current provision, and design for future wellbeing<sup>1</sup>, while the United Nations promotes green urban spaces for "Sustainable Urban Health" in this time of increasing urbanisation and climate change<sup>2</sup>.</li> </ul> <p>The need for action:</p> <ul style="list-style-type: none"> <li>WCC documents have been stating there's a need for more green spaces in Te Aro since at least 19983.</li> <li>With the projected population increases for this area the provision of public green spaces is now crucial.</li> <li>The WCC 2019 Green Space in Wellington's Central City<sup>4</sup> report clearly advocates for more green space in Te Aro. This report actually includes 153 Cuba St as a significant part of a conceptual 'Cuba Quarter Green Nexus' (see photo, right). With the planned improvements in Swan Lane and Garrett St, WCC is making a small step towards this goal.</li> <li>Decisive action - not more reports - is needed now.</li> </ul> <p>The time for action is NOW:</p> <ul style="list-style-type: none"> <li>Currently 153 Cuba St is a carpark. WCC's recent move to close this section of Cuba S to vehicles effectively makes this function redundant<sup>5</sup>. This gives WCC a unique, once-in-a-lifetime opportunity to purchase this land. Seize it!</li> <li>153 Cuba St would be immediately useable for a small improvement costs and further enhancements could be staged over time. This area has already demonstrated its potential as an effective public gathering place during the Cuba Dupa festivals. And it is accessible for all. It would be a valued public green space in a popular and populated area of the city that benefits visitors and residents.</li> </ul> <p>I urge the WCC to include the purchase of 153 Cuba St for a future public park into the latest District Plan.</p> <p>This submission relates to the City Centre Zone of Part 3 of the Draft District Plan, particularly to CCZ05, Amenity and Design, along with CCZ-P11, Quality and Amenity</p> <p>Greater Brooklyn Residents Association Inc</p> <p>With the plan to make Cuba Street carless, the car park next door to Floriditas, opposite Garrett Street, should be made into a green space.</p>				<p>This is not within the remit of the District Plan and relates to forces outside of the Plan. <b>No change to the Plan.</b></p>
<p><b>Civic Square</b></p>	<p>Matthew Plummer</p>	<p>951.1</p>	<p>N/A</p>	<p>Regarding Civic Square, I understand 'heritage' protection is only being applied to the City Art Gallery building, and the Town Hall. I support this - the overall Civic Precinct has no heritage value, with many of the 1990s buildings done at the wrong scale and location to the 1970s Kennedy masterplan. Indeed, Nintendo's 'Game Boy' handheld console came out two years before the Central Library and CAB were opened - 'heritage' they are not. Extending heritage</p>				<p>This relates to the heritage status of buildings in the Civic Square. Feedback noted.</p>

				<p>categorisation to assets beyond these two buildings to the wider Italianate pastiche will bind WCC's hands in its asset management practises.</p>			<p><b>Changes made.</b> Post Draft District Plan, Council received Councillor support to remove the Civic Centre Heritage Area and replace it with the Te Ngākau Civic Square Precinct. A lot of the guidance has been retained in policies but this now gives effect to redevelopment and policy direction in the Te Ngākau Framework.</p>
<b>Civic Square</b>	Wellington Civic Trust – Jim McMahon	875.1	N/A	<p><b>PLANNING FOR TE NGAKAU</b></p> <p>In the Operative District Plan, the area now called Te Ngākau is identified as The Civic Centre Heritage Area, within the Central Area Activity Area, and also identified as one of the “unique neighbourhoods and precincts crucial to the Central Area’s cultural heritage and sense of place” provided for in the Plan as a Heritage and Character Area. As a heritage area, it has its own specific rules (including height and sunlight protection) and design guidance to help to maintain and enhance its special character. Only two buildings within the Area are identified as having specific heritage values – the Town Hall and the City Art Gallery.</p> <p>The objective and Design Guidance for the area are set out below...</p> <p>In the Draft Plan the area is within the City Centre Zone, and the same area, Te Ngākau, is identified in Schedule 3 as Heritage Area No 29, identified for Values A,B,C,E,F (i.e all recognised values except for tangata whenua values). The notes relating to the Heritage Area include the following statement: “Exclusions - The following buildings, structures and sites are identified as non-heritage: Wellington Library, 57-71 Victoria St; Administration building (new), and portico (already demolished); Ilott Green (foundations of building);</p> <p>Approaches to bridge (and associated buildings &amp; structures)”. The same two buildings are recognised as having heritage values, with the MFC being identified as a contributing building.</p> <p>The Plan Maps also show the area of the Heritage Area as the Te Ngākau Precinct.</p> <p>The area has a maximum height of 27m specified, and as a Heritage area is protected to a certain extent by rules controlling height relating to boundaries and street widths for adjacent development. A minimum height of 15m is also included.</p> <p>Te Ngākau Precinct</p> <p>The Introduction to the Plan states that “A precinct spatially identifies and manages an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone(s).”</p> <p>While Te Ngākau Precinct is clearly shown on the Plan Maps, we have not been able to find any description, definition or specific objectives, policies or stated outcomes for this Precinct.</p> <p>There is one rule that refers to precincts, but this is limited to controlling building height adjacent to a character precinct. There is also a policy CCZ-P10, which seeks to manage development adjoining a character precinct. However, Te Ngākau Precinct is not identified as a character precinct (in the plan maps) and even though it is the only precinct within the City Centre Zone, it</p>		<p>Objectives and policies are sought in the City Centre Zone that are specific to the Te Ngakau Precinct.</p>	<p>Agree with sentiments raised regarding the need for Civic Precinct specific objectives and policies.</p> <p><b>Changes made.</b> Post Draft District Plan, Council received Councillor support to remove the Civic Centre Heritage Area and replace it with the Te Ngākau Civic Square Precinct. A lot of the guidance has been retained in policies but this now gives effect to redevelopment and policy direction in the Te Ngākau Framework.</p> <p>Amend as follows:</p> <ol style="list-style-type: none"> <li><a href="#">1. Remove the Civic Centre Heritage Area from the PDP.</a></li> <li><a href="#">2. Replace it with a precinct within the CCZ titled Te Ngākau Civic Square Precinct with separate introduction, policies and objectives.</a></li> <li>Add content to the City Centre Zone introduction as follows:</li> </ol> <p><b>Also centrally located within the City Centre Zone is Te Ngākau Civic Square – a distinct civic precinct that abuts Victoria Street, Wakefield Street, Harris Street and Jervois Quay and acts as a key connector to the city’s waterfront. The precinct is entering a phase of transition, with some of its associated civic buildings and assets requiring either earthquake strengthening or redevelopment. In addition to seismic resilience challenges it also faces significant climate and water management related issues including flooding and inundation.</b></p>

			<p>is not clear whether the policy and rule provision is intended to apply. In any case, as it is not stated what the attributes of any of the precincts are (character or otherwise), it is not apparent how this policy would be measured or achieved.</p> <p>This is of great concern to the Trust, given the Te Ngākau Precinct's very significant cultural, social and functional importance to the City. This was very clearly demonstrated at a Civic Trust Seminar in May 2021[1] when numerous and diverse presenters provided their perspectives on this extremely important area. The Trust seeks that at the very least the Precinct is mentioned specifically in the City Centre Zone and an objective and guidelines are provided for the redevelopment of this very important area.</p> <p>Heritage Area</p> <p>In the present draft of the Plan, it appears the Te Ngākau Precinct is therefore primarily to be managed as a Heritage Area under the Historic Heritage chapter of the plan – see objectives and policies. We have looked for anything specific in the Design Guide Heritage (in Part 4 of the Plan) that might relate to or illustrate the importance of this particular Heritage Area, and find nothing at all – not even a photograph. This is a serious omission for a place of such significance to Wellingtonians. We do not have any specific comments on the 51 pages of the current Draft Design Guide (due to lack of relevant content and lack of time to comment), however, we will be looking for some recognition in the next version of the Plan.</p> <p>We have a number of other comments about the provisions that relate to the Civic Centre Heritage Area (No 29 in Schedule 3).</p> <p>We note that only two buildings, the Town Hall and the City Art Gallery, are identified as having historic heritage values (and are listed in the Appendix) with the Michael Fowler Centre being identified as a contributing building. The Wellington Central Library has been classified this year by Heritage New Zealand Pouhere Taonga as a Category 1 Historic Place. This building needs to be added as an individually listed item, and as a historic building in Schedule 1, and as a protected building in Te Ngākau Historic Area in Schedule 3 (and removed from the list of unprotected items in that schedule).</p> <ul style="list-style-type: none"> <li>· The Trust also seeks that the two other existing buildings and one structure which help form the highly-regarded and well-used Civic Centre open space (Civic Square) are recognised and identified as contributing buildings – the former Municipal Office Building, the Civic Administrative Building and the City to Sea Bridge. These buildings and structure should be retained and reused, and such recognition will foster that outcome.</li> <li>· We consider that this Area may have tangata whenua values, given that it has recently been given a specific name by mana whenua, and given the documented use of this area (see item in footnote 1 of this submission) and this should be added to the attributes applying to this area.</li> <li>· In the rules for Historic Areas, we consider that the rules for demolishing existing buildings and structures, and building new buildings and structures should be modified for the Te Ngākau Historic Area so that they are all fully discretionary activities and resource consent applications are subject to public notification. It is highly inappropriate to expect that there is no public interest in the removal of the several buildings and many structures that are shown as having no historic values, and to make such activities permitted. There is a strong case that such structures have contributed to the recognition of the place (and its sense of place). In Te</li> </ul>			<p>A long-term vision for the Te Ngākau Civic Square Precinct has been developed and approved by the Council, the focus of which is ensuring the precinct becomes a vibrant, safe and inclusive area that enables creative, cultural, civic and arts activities to flourish. The City Centre Zone aligns with this vision by enabling a level of redevelopment to occur that accommodates the range of activities anticipated.</p>
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				Ngākau, they have all got there on the basis of public expenditure (even the former Circa foundations), and therefore have importance to the wider community.			
<b>Civic Square</b>	Ralf Schwate	699.1	N/A	Te Ngakau/Civic Centre should not be opened for private development but be revitalised. I do not oppose commercial spaces (e.g. cafes, shops) or residential spaces (affordable housing owned by the council) in this space.			
<b>All provisions</b>	Waka Kotahi	1131	All provisions	Support all CCZ provisions. In particular, Waka Kotahi supports provision for public transport, consideration of function of the transport network, the discouragement of carparking visible at street edge along an active frontage and the quality design outcomes.			<b>No change.</b> Support noted. No response needed.
<b>Change to the introduction to reference “shop”</b>	Wellington Chamber of Commerce - Joe Pagani	1111.1	Intro	<p>A City Centre for Business</p> <p>The Draft District Plan’s vision for a denser, more efficient city centre is one which the Chamber wholeheartedly endorses. But we note our concern at the absence of central city from the vision.</p> <p>The Draft District Plan’s vision for a city in which we can live, work and play, is welcome, but unfortunately absent is the word “shop.” For a denser Wellington to work, we need a strong business environment in the city centre -with residents able to access the array of services they need within a short walk.</p> <p>We call for the Council to include consideration on how to facilitate the growth of these businesses within the city centre.</p>		Seeks more consideration for businesses in the City Centre Zone.	<p><b>No change.</b> Council agrees that we need a strong business environment. However, no change is made as Council believes this is already being achieved through:</p> <ul style="list-style-type: none"> <li>• Strategic Direction CEKP-O2 details that the City Centre is the primary centre serving the City and the wider region for sopping, employment, city-living etc. A direct reference is made to shopping.</li> <li>• The purpose of the zone talks about the area being the principal commercial and employment centre which includes shopping. Given commercial covers shopping there is not a need to spell this out in the zone.</li> <li>• Commercial Activities are a Permitted Activity in the zone as well.</li> </ul>
<b>General support for Objectives and Policies</b>	Fabric Property Limited - Bianca Tree	1139.4	General	Fabric supports the objectives and policies for the City Centre zone generally.			<b>No change.</b> Support noted. No response needed.
<b>Support for Objective 1</b>	Fabric Property Limited - Bianca Tree	1139.4	CCZ-O1	Fabric specifically supports the recognition of the City Centre as the primary commercial and employment centre for the wider region (CCZ-O1).			<b>No change.</b> Support noted. No response needed.
<b>Support for Objective 1</b>	Z Energy	1101.2	CCZ-O1	Z Energy supports CCZ-O1 (Purpose) recognising that the CC is the primary commercial and employment centre serving Wellington and the wider region.			<b>No change.</b> Support noted. No response needed.

<b>Support for Objective 1</b>	Kainga Ora	1126	CCZ-O1	Kāinga Ora supports the introduction and application of a City Centre Zone in the Draft District Plan. Kāinga Ora supports this objective.			<b>No change.</b> Support noted. No response needed.
<b>Support for Objective 2</b>	Fabric Property Limited - Bianca Tree	1139.4	CCZ-O1	Fabric specifically supports the recognition of the role of the City Centre in accommodating growth (CCZ-O2).			<b>No change.</b> Support noted. No response needed.
<b>Support for Objective 2</b>	Kainga Ora	1126	CCZ-O2	Kāinga Ora supports this objective.			<b>No change.</b> Support noted. No response needed.
<b>Support for and amendments to Objective 2</b>	Z Energy	1101.2	CCZ-O2	<p>Z Energy supports CCZ-O2 (Accommodating Growth) recognising the role of the CC to accommodate future growth in residential, commercial and community services and agrees that providing such development capacity should include the matters included in 1-4 of the Objective. However, the City Centre also need to enable a broad range of commercial activities that support the business and residential intensification sought.</p> <p>Retain the City Centre zoning of the listed Z sites and the objectives, policies, rules, standards and assessment criteria of the CCZ Chapter, except as follows:</p> <p>Amend Objective CCZ-O2 (Accommodating Growth)</p> <p>The City Centre Zone plays a significant role in accommodating residential, business and supporting community service growth, and has sufficient serviced development capacity to meet its short, medium and long term residential and business growth needs, including:</p> <ol style="list-style-type: none"> <li>1. A choice of building type, size, affordability and distribution, including forms of medium and high-density housing;</li> <li>2. Convenient access to active and public transport activity options;</li> <li>3. Efficient, well integrated and strategic use of available development sites; and</li> <li>4. Convenient access to a range of <u>commercial service</u> and open space options.</li> </ol>		Submitters seeks an addition to reference 'commercial service'.	<p>Business activities are referenced in the first sentence of the objective. However, Council can understand the benefit of referencing commercial activities and community facilities in addition to open space in the convenience access portion of this objective.</p> <p>The National Planning Standards defines 'Commercial Activity' not 'commercial service'. Hence, the former needs to be referenced.</p> <p><b>Amend CCZ-O2 as follows:</b></p> <p>Accommodating Growth</p> <p>The City Centre Zone plays a significant role in accommodating residential, business and supporting community service growth, and has sufficient serviced development capacity to meet its short, medium and long term residential and business growth needs, including:</p> <ol style="list-style-type: none"> <li>1. A choice of building type, size, affordability and distribution, including forms of medium and high-density housing;</li> <li>2. Convenient access to active and public transport activity options;</li> <li>3. Efficient, well integrated and strategic use of available development sites; and</li> <li>4. Convenient access to a range of open space, <u>and supporting commercial activity and community facility</u> options.</li> </ol>

Support for Objective 3	Kainga Ora	1126	CCZ-04	Fabric specifically supports the enablement of the most intensive form of development concentrated in the zone (CCZ-03).			No change. Support noted. No response needed.
Support for Objective 3	Kainga Ora	1126	CCZ-03	Kāinga Ora supports this objective.			No change. Support noted. No response needed.
Support for Objective 4	Kainga Ora	1126	CCZ-04	Kāinga Ora supports this objective.			No change. Support noted. No response needed.
Support for Objective 4	VicLabour	1056	CCZ-04	<p>We are supportive of the Ahi Kā provisions, particularly around development of papakāinga housing. Māori should lead this. We are very supportive of WCC taking a partnership approach within a Te Tiriti framework, especially in relation to areas and sites of significance to Māori. In our view there is a saturation of colonial/settler monuments in the city, and mana whenua should be partnered with and empowered to shape the future of the city.</p> <p>As part of this, it is important that WCC is willing to change current design rather than only taking a Te Tiriti approach for future developments.</p>			No change. Support noted. No response needed.
Changes to Objective 5	Karen and James Fairhall	907.1	CCZ-05	<p>The draft plan includes policies CCZ-07, CCZ-P10 and CCZ-P13, which specifically seek to ensure adverse effects from scale and dominance of new buildings are managed in the CCZ where this zone interfaces with heritage areas and with residentially zoned areas. To give effect to this intent, the following amendments are required to the draft policies and rules:</p> <p>Amendments - the draft plan should be amended as follows:</p> <p>1. <b>Amend</b> Policy CCZ-05: Sub-clause 7. Acknowledging and sensitively responding to adjoining heritage buildings, <u>heritage areas</u> and areas and sites of significance to tangata whenua.</p>		Seeks amendment to objective to include reference to heritage areas.	<p>Agree with amendment.</p> <p>Amend Objective CCZ-05 as follows:</p> <p>7. Acknowledging and sensitively responding to adjoining heritage buildings, <u>heritage areas</u> and areas and sites of significance to tangata whenua.</p>
Support for Objective 5	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	CCZ-05	HNZPT supports the inclusion of reference to adjoining heritage buildings/areas and sites of significance			No change. Support noted. No response needed.
Support for Objective 5	Kainga Ora	1126	CCZ-05	Kāinga Ora supports this objective.			No change. Support noted. No response needed.
Support for Objective 6	Kainga Ora	1126	CCZ-06	Kāinga Ora supports this objective.			No change. Support noted. No response needed.

<b>Support for Objective 7</b>	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	CCZ-O7	HNZPT supports this objective, including the reference to interfaces with heritage and scheduled sites			<b>No change.</b> Support noted. No response needed.
<b>Support for Objective 7</b>	Kainga Ora	1126	CCZ-O7	Kāinga Ora supports this objective.			<b>No change.</b> Support noted. No response needed.
<b>Support for P1</b>	Z Energy	1101.3	CCZ-P1	Z Energy Supports CCZ-P1 (Enabled Activities) which enables a wide-range of activities including commercial activities (as defined).			<b>No change.</b> Support noted. No response needed.
<b>Support for P1</b>	Ministry of Education Te Tahuu o Te Matauranga	1129.16	CCZ-P1	The Ministry supports this policy as it recognises and enables Educational Facilities as enabled Activities that positively contribute to the purpose of the zone.			<b>No change.</b> Support noted. No response needed.
<b>Support for P1</b>	Kainga Ora	1126	CCZ-P1	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for P2</b>	Kainga Ora	1126	CCZ-P2	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for P2</b>	Z Energy	1101.3	CCZ-P2	<p>Policy CCZ-P2 identifies activities potentially incompatible with the purpose of the CCZ, including industrial activities, yardbased retail, ground level carparking and residential activities, and vacant sites and seeks to only allow these activities where they will not have an adverse effect on its vitality, vibrancy and amenity. Z Energy agrees with the intent of the policy in relation to new activities but considers it is too specific and it will impact on the continued operation, maintenance and upgrade of a range of existing activities.</p> <p>Amend Policy CCZ-P2 (Potentially incompatible activities)</p> <p>Only allow <u>new</u> activities that are potentially incompatible with the purpose of the City Centre Zone, where they will not have an adverse effect on its vitality, vibrancy and amenity. Potentially incompatible activities include:</p> <ol style="list-style-type: none"> <li>1. Industrial activities;</li> <li>2. <u>Some</u> yard-based retail activities;</li> <li>3. Carparking at ground level;</li> <li>4. Demolition of buildings that result in the creation of vacant land; and</li> <li>5. Ground floor residential activities on streets identified as having either an active frontage or verandah coverage and in any identified hazard risk areas.</li> </ol>		Seeks a slight tweak to CCZ-P2 to note that 'some' yard-based retail activities are potentially incompatible to reflect	<b>No change.</b> Council does not think the proposed change is warranted and use of the word 'some' is vague.



<b>Support for P3</b>	Kainga Ora	1126	CCZ-P3	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for P4</b>	Kainga Ora	1126	CCZ-P4	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for P5</b>	Kainga Ora	1126	CCZ-P5	Kāinga Ora strongly supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Changes to Policy 5</b>	Karen and James Fairhall	907.1	CCZ-P5	2. Policy CCZ-P5: <b>Add</b> new sub-clause 3: “Ensuring an appropriate scale of development where the CCZ interfaces with heritage areas and residentially zoned areas”			<b>No change</b> to CCZ-P5 as this is addressed in CCZ-P10.2.
<b>Support for P7</b>	Kainga Ora	1126	CCZ-P7	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for P8</b>	Kainga Ora	1126	CCZ-P8	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support for and amendments to P8</b>	Z Energy	1101.3	CCZ-P8	<p>Z Energy supports CCZ-P8 (Comprehensive Development) which seeks to provide for integrated, comprehensive and well-designed intensification where some specific design outcomes are identified. The policy should also recognise the existing environment and that alternative design responses are necessary for functional requirements of a range of activities, including existing service stations.</p> <p>Amend Policy CCZ-P8 (Comprehensive Development)</p> <p>Provide for integrated, comprehensive, well-designed intensification throughout the City Centre Zone that:</p> <ol style="list-style-type: none"> <li>1. Optimises the development capacity of land, particularly sites that are: a. Large; or b. Narrow; or c. Vacant land; or d. Ground level carparking areas; and</li> <li>2. Acts as a positive catalyst for future change by reflecting the nature and scale of development proposed within the Zone and in the vicinity;</li> <li>3. Makes a positive contribution to the amenity and evolving identity of the area;</li> <li>4. Provides for the increased levels of residential accommodation anticipated;</li> <li>5. Provides for a range of supporting business, open space and community facilities;</li> <li>6. Has good pedestrian connectivity built s, public spaces and existing and planned rapid transit stops; and</li> <li>7. Activates ground floors and outdoor spaces for public access and use, <u>or</u></li> <li>8. <u>Recognises that alternative design responses are necessary for functional requirements of a range of activities, including existing service stations.</u></li> </ol>			<b>No change as a response of this submission. However, change made in that</b> comprehensive development policy and associated rule has been deleted and policy direction relating to comprehensive development has been integrated into CCZ-P9 Quality design outcomes. The definition of Comprehensive Development has been retained.

<b>Support for P9</b>	Kainga Ora	1126	CCZ-P9	Kāinga Ora supports this policy.			<b>No change.</b> Support noted. No response needed.
<b>Support in Part and Amendments to P10 sought</b>	Kainga Ora	1126	CCZ-P10	Kāinga Ora seeks amendment to change the word “require” to “promote”.  <del>Require</del> <u>Promote</u> new development, and...		Slight wording tweak sought	<b>No change made.</b> It is our intention to use strong wording through ‘require’ and ‘promote’ is too soft. We expect good design outcomes and ‘promote’ is not assertive enough.
<b>Amendments to P10</b>	Z Energy	1101.3	CCZ-P10	Similarly, CCZ-P10 (Quality Design Outcomes) requires new development and additions and alterations, to positively contribute to the sense of space and form, quality and amenity of the CCZ. This being through, where relevant, providing continuous pedestrian shelter along streets requiring verandah coverage, requiring active frontages and ground floor glazing along identified street edges. The policy should also recognise that alternative design responses are necessary for functional requirements of a range of activities, including existing service stations.  Amend Policy CCZ-P10 (Quality Design Outcomes) Require new development, and alterations and additions to existing development, at a site scale to positively contribute to the sense of place and distinctive form, quality and amenity of the City Centre Zone by ensuring that, where relevant, it: ....  <u>17 Recognises that alternative design responses are necessary for functional requirements of a range of activities, including existing service stations.</u>			<b>No change.</b> Council anticipates development certain development outcomes i.e. building up to the street edge in achieving efficient use of land. If these requirements are not met they are considered in the resource consent process.
<b>Support for Policy 10</b>	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	CCZ-P10	HNZPT supports this policy, particularly the requirement to be responsive to the site context, including adjacent heritage and character areas.			<b>No change.</b> Support noted. No response needed.
<b>Support in Part and Amendments to P11 sought</b>	Kainga Ora	1126	CCZ-P11	Kāinga Ora supports this policy in part but seeks amendments to remove communal outdoor space requirements, and to change “achieve” to “promote”.  <del>Achieve</del> <u>Promote</u> a high standard of on-site amenity in the City Centre Zone by:  1. Providing building occupants with access to an adequate level of daylight;  2. Ensuring access to convenient outdoor space, <del>including private and shared communal living areas and pocket parks;</del>  3. Providing for the storage needs of building occupants; and...		Seeks to change wording and to remove communal outdoor space requirements.	<b>No change.</b> It is our intention to use strong wording through ‘achieve’ and ‘promote’ is too soft. We expect to achieve a high standard of on-site amenity and ‘promote’ is not assertive enough.  To align with the associated standard, Council is retaining reference to ‘private and shared communal living areas’. However <b>change made</b> to ‘pocket parks’ reference as it is not required.
<b>Delete Policy 12</b>	Kainga Ora	1126	CCZ-P12	Kāinga Ora opposes requiring ‘City Outcomes Contribution’ for ‘over height’ development. This policy has the potential to disincentives residential development. ‘Over height’ developments should instead be considered on their own merits and effects. Deletion sought.		Seeks that City Outcome Contribution mechanism is deleted.	<b>No change.</b> Council is retaining this mechanism for the benefits it will provide.

<p><b>Opposition to Policy 12</b></p>	<p>Fabric Property Limited - Bianca Tree</p>	<p>1139.4</p>	<p>CCZ-P12</p>	<p><b>7. CITY OUTCOMES CONTRIBUTIONS</b></p> <p>7.1 Policy CCZ-P12 and related rules require over height, large-scale residential, non-residential and comprehensive development in the City Centre zone to deliver City Outcomes Contributions as detailed in the Design Guide guideline G107.</p> <p>7.2 Fabric is opposed to the 'City Outcomes Contributions' provisions, and specifically is opposed to requiring 'City Outcomes Contribution' for 'over height' development. While Fabric recognises the intent of these provisions in providing publicly beneficial outcomes, it is inappropriate for the provision of these publicly beneficial outcomes to be connected to non-compliance with height rules. Developments that breach height standards should instead be considered on their own merits and effects. The provision of beneficial outcomes in any development should be considered as part of the merits of a development, and should not be confined to a specified and required list.</p> <p>7.3 The 'City Outcomes Contributions' have the potential to act as a disincentive for development, which conflicts with the Draft Plan strategic objectives and NPS-UD requirements of providing development capacity and urban intensification. This would not achieve the aim of "density done well" as stated in the Design Guide.</p> <p>7.4 Furthermore, it is considered that some of the listed City Outcomes Contributions, such as seeking that a portion of the site be vested as public space, are ultra vires the Council's functions and duties under the Resource Management Act 1991 (RMA).</p> <p>7.5 Accordingly, Fabric seeks that all references to the City Outcomes Contributions be removed from the Draft Plan and design guides.</p>		<p>Seeks that City Outcome Contribution mechanism is deleted.</p>	<p><b>No change to COC mechanism itself.</b> Council is retaining this mechanism.</p> <p><b>Change made,</b> 'vesting a portion of the site as public space' has been changed to "accessible as public space" in the design guides.</p> <p><b>Amend CCZ-P12 as follows:</b></p> <p>CCZ-P12 becomes CCZ-P10 as Comprehensive Development policy deleted and reworked into CCZ-P9.</p> <p>Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the <a href="#">Centres and Mixed Use Design Guide</a> guideline G107, including through either:</p> <ol style="list-style-type: none"> <li>1- Positively contributing to public space provision and the amenity of the site and surrounding area by: <ol style="list-style-type: none"> <li>a. <del>Vesting a portion of the site as public space for the use and enjoyment of the public;</del></li> <li>or</li> <li>b. <del>Providing publicly accessible space such as a laneway or through block connection; or</del></li> <li>c. <del>Providing a building frontage or set back that helps activate street life and encourage social interaction;</del></li> <li>or</li> <li>d. <del>Providing access to permanent on-site amenities such as public toilets;</del></li> <li>and/or</li> </ol> </li> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> </ol>
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<b>Support for and amendments to P12</b>	Z Energy	1101.3	CCZ-P12	<p>Z Energy supports CCZ-P12 (City Outcomes Contribution) which seeks to deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guide guideline G107. However the policy should also recognise the existing environment and the functional requirements of a range of activities.</p> <p>Amend Policy CCZ-P12 (City Outcomes Contribution)</p> <p>Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guide guideline G107, <u>while recognising the existing environment</u>, including through either:</p>		Seeks reference to the existing environment in CCZ-P12.	<b>No change.</b> The intent of City Outcomes Contribution is to enable new development that contributes positively to city outcomes. Council does not believe this mechanism will negatively impact the functional requirement of activities. In addition, the existing environment will be recognised through the resource consent application process with consideration given to the effect of the new proposal on the surrounding environment. The City Centre will evolve over time and change can be positive if effectively managed.	
<b>Concerns regarding minimum sunlight protection hours</b>	Inner City Wellington - Stephen King	450.1	CCZ-P13	<p>Sunlight Protection</p> <p>ICW has consistently advocated for consideration to be given in the planning process to the needs of Inner-City residents whose use of inner-city green space and open space extends beyond Monday to Friday business hours.</p> <p>We note that policy CCZ-P13. Appendix 9 lists a number of city centre and waterfront zone areas with similar sunlight protection requirements, ranging in length from 1.5 hours to 6 hours. 2 hours appears to be the predominant figure proposed.</p> <p>2 hours does not in our opinion offer appropriate support to the extended use requirements of residential users. ICW believes that both existing green and open spaces and potential spaces identified in the Green Network Plan require sunlight protection at the higher end of the proposed scale.</p> <p>ICW MAINTAINS that for the green network plan to deliver the quality of open spaces necessary to support the needs of the inner-city neighbourhoods, current and future green and open spaces must have their sunlight protected from development. Justification should be required for anything less than 6 hours in public open spaces.</p>		The submitter seeks that Appendix 9 should be amended to ensure sunlight access to parks for 6 hours, not 2 hours.	<b>No change.</b> Whilst the submitters concern is recognised and it is Council's desire to maintain as much sunlight to public spaces as possible, having a 6 hour requirement on spaces is just not practical or possible. Some parks currently do not receive a full 6 hours sunlight based on existing surrounding development. Requiring 6 hours would not be attainable for some small parks and it also places a large burden on future development to reduce building capacity to meet these shading restrictions. This would not be in accordance with the NPS-UD requirements.	

<b>Policy regarding functional and operational needs</b>	Foodstuffs North Island Ltd	777.6	New policy	Request that the following policy is included in the Centre zones: Recognise the functional and operational requirements of activities and development including for the need for loading zones, back of house areas, truck deliveries, rubbish and recycling and other such activities necessary to support the operation of business, residential and community activities.		Seeks a new policy be added.	<b>No change.</b> This policy should be targeted at the Transport chapter, not Centres Zones.
<b>Suggestion for change to rule framework to permit supermarkets</b>	Woolworths NewZealand Limited - Andrew Macleod/Rachel Ritchie	1112.1.	New rules	<p>b) The Draft Plan does not explicitly enable supermarkets in any zone without resource consent - be it for the activity itself or the construction of the building. This is at odds with both the higher order enabling framework set out in the Draft Plan and the National Policy Statement on Urban Development 2020 ("NPSUD").</p> <p>c) To support the "centres plus" approach, Woolworths considers the appropriate activity status for supermarkets, as essential services and catalysts for well-functioning urban environments, should be:</p> <p>a. Permitted in all Commercial and Mixed Use Zones (including the Neighbourhood Centre, Local Centre, Commercial, Mixed Use, Metropolitan Centre and City Centre Zones);</p> <p>...</p> <p>e) Woolworths supports the approach taken in the Commercial and Mixed Use Zones which provides for standard infringements in respect of built form and site layout, to be considered a restricted discretionary activity as this supports a more efficient consenting process. While Woolworths supports the provisions that encourage good urban design for buildings in Commercial and Mixed Use Zones, it is important that the Draft Plan does not undermine the operational needs of activities, such as supermarkets</p>			<b>No change.</b> Council anticipates that Supermarkets fall under the definition of 'Commercial Activity' from the National Planning Standards. Thus the activity (not the building) would be permitted already under the CCZ.
<b>Support for R1</b>	Z Energy	1101.4	CCZ-R1	Z Energy supports Rule CCZ-R1 (Commercial Activities) which provides for commercial activities (as defined) as a permitted activity with no limitation as to the land use activity. It is understood that any new building or structure to be erected on would still need to comply with the applicable permitted activity performance standards under Standards CCZ-S1 - S14, or require consent as a restricted discretionary activity where those standards cannot be met			<b>No change sought.</b> Support noted. Correct in that the standards would need to be met/ resource consent required for the building.
<b>Support for R3</b>	Ministry of Education Te Tahuu o Te Matauranga	1129.16	CCZ-R3	The Ministry supports this rule as it provides for Educational Facilities as permitted activities within the zone. The Ministry considers it important to recognise and provide for social infrastructure (such as schools) which will service the surrounding residential catchments and other community/commercial activities.			<b>No change.</b> Support noted. No response needed.
<b>Support for R11</b>	Kainga Ora	1126	CCZ-R11	Kāinga Ora supports this rule			<b>No change.</b> Support noted. No response needed.
<b>Carpark buildings approval</b>	VicLabour	1056	CCZ-R13	The district plan must play a key role in supporting the shift away from car-dependency and gridlock to public and active transport and efficient travel that minimises emissions. Carpark buildings should not be automatically approved should the minimal specifications set out in section CCZ-R13 be met. We are concerned that carpark buildings detract from the vibrancy of central cities, and lock in and encourage private vehicle transport on a scale that is not sustainable to meet our climate goals.			<b>No change.</b> This Draft Plan rule is a more restrictive approach than the Operative Plan. A carparking building would require consent and is not permitted. It is only the activity of car parks either above ground in other mixed use buildings or in carparking buildings that are permitted. Not the

				<p>Instead, criteria should be established for any new carpark buildings, which should include whether there are already carparks provided in reasonable proximity, the effect on traffic flow and air pollution in the relevant area, the main function of the area (i.e. if it is a business or commercial-oriented, or arts and recreational-oriented, part of the city), and accessibility. The provision of ground-level parking should be minimised, and we urge consideration of whether any new parking buildings should be excluded from using the ground floor for parking purposes.</p>			<p>buildings itself. We are trying to minimise ground-level carparking through Rule 13.</p> <p>The criteria mentioned are things that would be worked through as part of the resource consent and design review process.</p>
<b>Discouraging parking at ground floor level</b>	Su-Wuen Ong	813.1	CCZ-R13	<p>City Centre - Agree about the 6 storey minimum to have a compact and sustainable city. As part of that, maybe you should actively encourage more building or conversion to apartments of all sizes and costs. You should do more active than just "discouraging" ground-level parking. Doing more will appear the mode change to active forms of transportation.</p>		Seeks that building conversions are encouraged.	<p><b>No change.</b> The Draft Plan's CCZ chapter actively encourages building conversion under CCZ-P6, unlike the Operative District Plan. It is also enabled through CCZ-Rule 20 where resource consents to covert buildings for residential activities is precluded from being notified.</p>
<b>Disagreement with Rule 13</b>	Woolworths NewZealand Limited - Andrew Macleod/Rachel Ritchie	1112.1.		<p>Carparking</p> <p>22. As noted above, the reality of Woolworths' customer base and behaviour is that private vehicles are a critical part of its operations. In this regard, the provision of carparking is a critical component of Woolworths' supermarket operations.</p> <p>23. Woolworths opposes the rules in the City Centre, Metropolitan Centre and Local Centre Zones which require that carparking that is visible at street edge along an active frontage or non-residential activity frontage require resource consent as a discretionary activity. The Local Centre (LCZ-R13) and City Centre (CCZ-R13) zones require automatic public notification under the respective rules.</p> <p>24. The visibility of carparking areas is necessary for Woolworths' supermarkets in that it enables wayfinding and pedestrian access, thereby increasing accessibility and convenience for customers. Visibility also ensures safety and security for customers and pedestrians which complies with Woolworths' goal to ensure that its developments create a safe environment for our communities and reflect the principles of crime prevention through environmental design.</p> <p>25. If Council consider that consent should be required for carparking that is visible from a street edge along an active frontage or non-residential activity frontage, Woolworths considers that this should be assessed as a controlled or restricted discretionary activity as the matters relevant to the assessment are limited to design and amenity considerations and should be assessed on a site specific basis taking into account the surrounding environment and the nature of the proposal. There is no justification in the objectives and policies in these zones for why the visibility of carparking should automatically require public notification.</p> <p>Woolworths considers that these rules will unnecessarily add complexity, cost and time to the resource consenting process for new supermarkets in Wellington City.</p>			<p><b>No change.</b> Council is enforcing NPS-UD carparking direction and generally wants to deter this in the CCZ in favour of seeking efficient use of land and intensification. Car parking can take place behind street edge and above and below ground levels.</p>

<b>Support for R14 and amendments sought</b>	Z Energy	1101.4	CCZ-R14	<p>Z Energy supports CCZ-R14 (yard-based retail activities) in so much as it provides for yard-based retail activities (the definition of which includes service stations) as a discretionary activity. It is understood that an application for resource consent made in respect of rule CCZ-R14 must, however, be publicly notified. Z Energy does not support this notification requirement and consider it may have a range of unintended outcomes, for instance activities locating in areas which are less suitable and create unrealistic expectations that changes, upgrades to and redevelopment of existing service station sites will not occur in the future without notification. It may also discourage existing activities from undertaking important maintenance and upgrades, for instance to better accord with good practise, introduce new technologies, or change to meet demand.</p> <p>To address this issue, Z Energy seeks clarity that operation, maintenance, and upgrade of existing service station / yard-based retail activity are not subject to this requirement, which is not considered appropriate for existing activities.</p> <p>Z Energy also considers there should be another exception to the notification analysis and that is where an existing or new activity is located on the edge of the zone. In particular, noting that the predominant zone which adjoins the CCZ is the MDRZ which does not require public notification for yard-based retail activities.</p> <p><b>Retain</b> Rule CCZ-R14 for yard-based retail activities as a discretionary activity with no activity specific standard, except <b>amend</b> notification status as follows:</p> <p>Notification Status: An application for resource consent <u>for a new activity</u> made in respect of rule CCZ-R14 must be publicly notified, <u>except where the new activity is established on a site that adjoins another commercial zone, the Medium Density Residential Zone or an arterial or collector Road.</u></p>				<b>No change.</b> Retention of current approach which recognises these as a form of yard based retail and Council's policy position is to deter yard based retail in the CCZ and seek efficient use of land consistent with the NPS-UD requirement for intensification and growth in residential accommodation.
<b>Support for R16</b>	Kainga Ora	1126	CCZ-R16	Kāinga Ora supports this rule				<b>No change.</b> Support noted. No response needed.
<b>Support in Part for R17</b>	Kainga Ora	1126	CCZ-R17	<p>Kāinga Ora supports this rule in part but seeks clarification, and any necessary amendments, to ensure that this rule will not have an unintended consequence of constraining staged developments.</p> <p>Amend as necessary to avoid potential unintended consequence of constraining staged developments.</p>				<b>No change based on submission</b> as Comprehensive Development rule has been deleted, as was found to be difficult to implement and can otherwise be implemented through building a building policy (CCZ-P9).
<b>Oppose in Part R18</b>	Kainga Ora	1126	CCZ-R18	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification. Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the "City Outcomes Contribution".</p> <p>Amend CCZ-R18 as follows:</p> <p>.....</p> <p>Matters of discretion are restricted to:</p>			Seeks that the Design Guide and City Outcome Contributions be removed in the matters of discretion.	<b>No change.</b> Council is not going to remove reference to the Design Guide or City Outcomes Contribution.

				<p>1. The matters in CCZ-P4, CCZ-P5, CCZ-P6, CCZ-P7, CCZ-P9, CCZP10, CCZ-P11, CCZ-P12 and CCZP13;</p> <p>2. The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard; and</p> <p>3. <u>The following urban design outcomes:</u></p> <p>a. <u>Provides an effective public private interface;</u></p> <p>b. <u>Provides a well-functioning site;</u></p> <p>c. <u>Provides high quality buildings; The Centres and Mixed-Use Design Guide, including guideline G107—City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 50 or more residential units or is a non-residential building.</u></p>			
<b>Support in Part R19</b>	Kainga Ora	1126	CCZ-R19	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the “City Outcomes Contribution”.</p> <p>Amend CCZ-R19 as follows:</p> <p>.....</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in CCZ-P1, CCZ-P2, CCZ-P3, CCZ-P4, CCZ-P5, CCZ-P6, CCZ-P7, CCZ-P8, CCZ-P9, CCZP10, CCZ-P11, CCZ-P12 and CCZP13;</p> <p>2. The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard;</p> <p>3. <del>The Centres and Mixed-Use Design Guide, including guideline G107—City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 25 or more residential units or is a non-residential building;</del> <u>The following centres and residential urban design outcomes:</u></p> <p>a. <u>Provides an effective public private interface;</u></p> <p>b. <u>Provides a well-functioning site;</u></p> <p>c. <u>Provides high quality buildings.</u></p> <p>4. The extent and effect of any identifiable site constraints; and</p> <p>5. The availability and connection to existing or planned three waters infrastructure.</p>		Seeks that the Design Guide and City Outcome Contributions be removed in the matters of discretion.	<b>No change.</b> Council is not going to remove reference to the Design Guide or City Outcomes Contribution.
<b>Construction Rule – R19</b>	Stratum Management Ltd – Craig Stewart	1115.4	CCZ-R19	<p>A new City Centre zone building (with a floor area of 100m2 or more) would require resource consent under Rule CCZ-R19.2 as a restricted discretionary activity.</p> <p>It is understood that the standards listed by Rule CCZ-R19.1 are also to be applicable to Rule CCZ-R19.2. This could be clearer in the rule as Rule CCZ-R19.2 appears to rely on CCZ-R19.1.</p>		Changes sought to CCZ-R19.2 and matters of discretion.  Clarity sought regarding how shading effects will be	<b>No change made to the link.</b> It is clear in the ePlan that CCZ-R19.2.a links back to CCZ-R19.1.



				<p>However, if a building has a floor area of 100m2 or more or exceeds 20% coverage as per subsection (a) of Rule CCZ-R19.1, then the link to subsection (b) appears to be broken and therefore it is unclear that the standards listed in CCZ-R19.1 remain applicable to CCZ-R19.2.</p> <p>Additionally, the matters of discretion for the rule are extensive. Some, like reference to Policies CCZ-PI - P3 are not required given the specific resource consent triggers for the activities covered by Policies CCZ-P2 and P3.</p> <p>CCZ-PI enables a range of activities, so is not relevant to a resource consent for a new building. CCZ-P8 only applies to Comprehensive Development which is addressed by a subsequent rule so can be removed here.</p> <p>A significant concern to Stratum is how the District Plan considers shading and the consequential impact on notification and the consideration of a proposal. As drafted, a building that complies with the various standards will be processed on a non-notified basis. Should the maximum height standard be breached, it is unclear from the assessment criteria and policies, how shading effects will be considered and the consequential impacts on the Council's notification decision. Stratum seeks strong clarity in the Proposed District Plan about this matter.</p>		considered and the impacts on notification decision.	<p>Council agrees with the references to policies P1-P3, and P8. Amend as follows:</p> <p><b>Change made to policy references.</b></p> <p>CCZ-R19.2</p> <p>...</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in <del>CCZ-P1, CCZ-P2, CCZ-P3, CCZ-P4, CCZ-P5, CCZ-P6, CCZ-P7, CCZ-P8, CCZ-P9, CCZ-P10, CCZ-P11, CCZ-P12</del> and <del>CCZ-P13</del>;</p>
<b>Support for R19</b>	Ministry of Education Te Tahu o Te Matauranga	1129.60	CCZ-R19	The Ministry supports this rule as it permits additions and alterations to buildings and structures that may be used as Educational Facilities. The Ministry considers the permitted activity standards for Educational Facilities to be acceptable as well as the matters.			<b>No change.</b> Support noted. No response needed.
<b>Support in Part R20</b>	Kainga Ora	1126	CCZ-R20	<p>Kāinga Ora supports this rule in part, and particularly supports the preclusion public and limited notification. Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought.</p> <p>Amend CCZ-R20 as follows:</p> <p>1. Activity status: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>4. The matters in CCZ-P11;</p> <p>5. The extent of compliance with standards CCZ-S10 and CCZ-S11 and satisfaction of associated assessment criteria;</p> <p>6. <del>The Residential Design Guide;</del> <u>The following residential urban design outcomes:</u></p> <p><u>a. Provides an effective public private interface;</u></p> <p><u>b. Provides a well-functioning site;</u></p> <p><u>c. Provides high quality buildings;</u></p> <p>and</p> <p>7. The availability and connection to existing or planned three waters infrastructure.</p> <p>...</p>		Seeks to remove reference to the Design Guide.	<b>No change.</b> Council retains reference to the Design Guide.

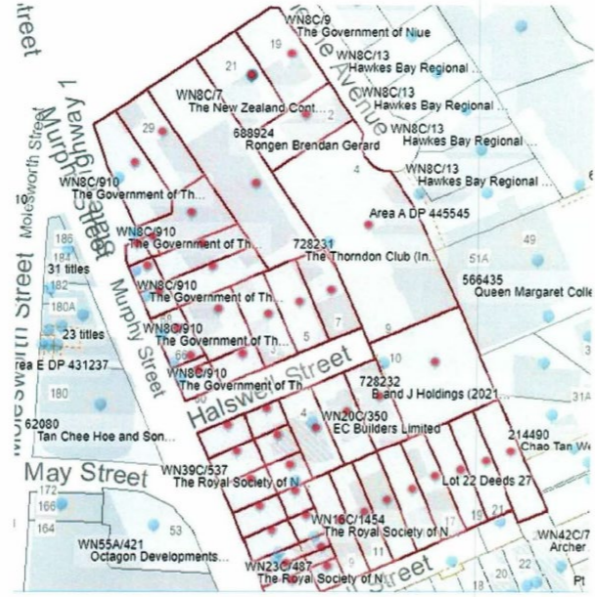
<p><b>Support in Part Comprehensive Development Rule – R21</b></p>	<p>Kainga Ora</p>	<p>1126</p>	<p>CCZ-R21</p>	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the “City Outcomes Contribution”.</p> <p>Amend CCZ-R21 as follows:</p> <p>1. Activity status: Restricted Discretionary</p> <p>Matters of discretion are restricted to:</p> <p>...</p> <p>3. <del>The Centres and Mixed Use Design Guide, including guideline G107— City Outcomes Contribution for any buildings or buildings within the development that:</del></p> <p><del>a. Exceed the maximum height requirements; or</del></p> <p><del>b. Are below the minimum height requirement; and</del></p> <p><del>c. Comprise 50 or more residential units;</del></p> <p><u>The following centres urban design outcomes:</u></p> <p><u>a. Provides an effective public private interface;</u></p> <p><u>b. Provides a well-functioning site;</u></p> <p><u>c. Provides high quality buildings.</u></p> <p>...</p>		<p>Seeks removal of the City Outcomes Contribution reference.</p>	<p><b>No change.</b> Council is retaining the City Outcomes Contribution mechanism.</p>
<p><b>Comprehensive Development Rule – R21</b></p>	<p>Stratum Management Ltd – Craig Stewart</p>	<p>1115.5</p>	<p>CCZ-R21</p>	<p>Rule CCZ-R21 provides for comprehensive development of land which is sized 2000m2 or greater. Policy CCZ-P8 supports the rule. A key aspect of this rule is the size of the underlying site, as opposed to Rule CCZ-R19.2 which otherwise provides for the construction of a new building.</p> <p>A key difference between the two rules, is that Rule CCZ-R21 provides a notification statement that precludes both public and limited notification in all situations. Rule CCZ-R19.2 provides two different notification alternatives depending on where non-compliances occur.</p> <p>The approach proposed under Rule CCZ-R21 provides a higher degree of certainty than CCZ-R19.2 and appears to try to incentivise land agglomeration to enable more comprehensive redevelopment.</p> <p>While that goal is laudable, in our view the prospect of land of that size being successfully agglomerated is small. The City Centre Zone is highly fragmented and held in multiple ownerships. Achieving agglomeration of that size in our experience would be challenging. Therefore, we encourage the Council to consider whether the rule is workable in practice, or whether it would largely be unutilised. The rule could be changed to lower the threshold, or other changes considered so as to not lose the benefits provided by the rule.</p>		<p>Proposes that the Comprehensive Development rule be removed, threshold altered or other changes made to incentivise use of the rule.</p>	<p><b>Change made</b> in that Comprehensive Development rule has been deleted. Comprehensive Development rule has been deleted, as was found to be difficult to implement and can otherwise be implemented through building a building policy (CCZ-P9).</p>

				It is also noted that there is some inconsistency in the drafting of Rules CCZ-R19 and CCZ-R21 which are for all intents and purposes equivalent rules. This could be streamlined in preparing the Proposed District Plan.			
<b>Comprehensive Development Rule – R21</b>	Fabric Property Limited - Bianca Tree	1139.4	CCZ-R21	Comprehensive development  8.6 Fabric supports the preclusion of public and limited notification in CCZ-R21 for comprehensive development and seeks that this rule is retained as drafted.			<b>No change.</b> Support noted. No response needed.
<b>Opposition to Maximum Building Height Standard</b>	Kainga Ora	1126	CCZ-S1	<p>Kāinga Ora opposes the City Centre building height controls as drafted and seeks that the building heights are simplified.</p> <p>The Central Wellington City and the City Centre Zone should provide for unlimited building heights to encourage intensification and development. There are rules and standards in the District Plan that will control bulk, location and height of buildings in the city centre. Height should not be limited in the City Centre.</p> <p>Kāinga Ora seeks simplification of the height controls.</p> <p>Amendments sought</p> <p>Amend CCZ-S1 as follows:</p> <p><u>There is no maximum height for buildings and structures in the City Centre zone except in the:</u></p> <p><u>- Adelaide Road height control area where buildings and structures must not exceed a maximum height of 42.5m above ground level.</u></p> <p><u>Location Limit</u></p> <p>a. <del>Height Control Area 1 – Thorndon Quay 35.4m</del></p> <p>b. <del>Height Control Area 2 – Waterloo Quay section 50m</del></p> <p>c. <del>Height Control Area 3 – Bulk of Thorndon 27m</del></p> <p>d. <del>Height Control Area 4 – Mid and Upper Molesworth Street 43.8m</del></p> <p>e. <del>Height Control Area 5 – CBD 55–95m</del></p> <p>f. <del>Height Control Area 6 – Eastern edge of CBD 43.8m</del></p> <p>g. <del>Height Control Area 7 – Te Aro 42.5m</del></p> <p>h. <del>Height Control Area 8 – SouthEast, South West Zone Edge 28.5m</del></p> <p>i. <del>Height Control Area 9 – Adelaide Road 42.5m</del></p>		Seeks removal of the maximum building heights in the City Centre.	<p><b>No change.</b> Councillors voted to retain City Centre maximum height limits as part of the Spatial Plan approval. Heights have increased in parts of the City Centre Zone. In addition, Council’s monitoring has shown that there has been significant under-development to date in the City Centre with the majority of buildings being built below the maximum building height which indicates that these maximum building heights are largely appropriate to retain apart from Te Aro.</p> <p><b>No change apart from the increase in maximum building heights</b> in one block in Te Aro along the South-East zone extent from 28.5m to 42.5m.</p> <p>In addition, the rule framework is enabling with no public notification for maximum height breaches and the introduction of the City Outcomes Contributions which allow for height exceedances beyond the maximum height.</p>
<b>Maximum Building Height Standard</b>	VicLabour	1056.1	CCZ-S1	We are pleased by the proposal for a minimum building height, but are disappointed by the imposition of upper height limits, against the advice of officials. The concerns about the various potential effects and risks of very high buildings can and should be managed in design requirements and consent processes. All around the world, cities build up in innovative ways to support booming cities and this restriction imposes an unnecessary restriction on our city’s			

				development and may contribute to a more sprawled out intensification. We recommend the removal of height limits in CCZ-S1.			
<b>Maximum Building Height Standard</b>	Guy Marriage	829.1	CCZ-S1	<p>Te Aro height limit is too tall at 42.5m</p> <p>The Draft District Plan is far too big to be able to be digested, tested and understood in such a short period of time, and coherently commented on. The timeline is ridiculously short for such a major redrafting and as such, I cannot comment with any validity on any part of the District Plan except for the area I have studied the most, as I live and work there: Te Aro.</p> <p>WCC have made a major change to the way the city has operated and been built on for the past hundred years. What was formerly clearly understood, the concept of the High City vs the Low City has now been destroyed. The proposal for 42.5m height in Te Aro is far too high, especially for what used to be known as the Low City.</p> <p>The Low City is based on sensible fact – the ground plane of Te Aro is a former swamp, with poor quality soil which is unsuitable for tall buildings. Witness fact 1: the proposed 35m high tower on the corner of Frederick St and Taranaki St have spent almost a year on foundations and have still not poured the ground floor slab. Total of 70 piles going well over 20m into the ground (each) and over a metre thick concrete slab indicate that this area is NOT the area for tall buildings. There is NO solid ground below the mud and shingle and the Te Aro basin is unsuitable for tall heavy buildings. By contrast, other nearby buildings 4-6 storeys tall can be made from much lighter construction systems and can be lighter. Buildings 4 storeys high in Martin’s Square have been started and completed during the time for the piling of foundations of the Frederick St project.</p>		Submitter seeks that the maximum building heights are reduced in Te Aro.	<p>Submitters concern is acknowledged. However, <b>no change</b> to the height limit for Te Aro. The Low City concept was a concept that existed before the introduction of the NPS-UD and without the growth pressures felt today, as well as before Let’s Get Wellington moving MRT routes were proposed.</p> <p>The Spatial Plan signals Te Aro as an area of growth and it will be on a key future LGWM MRT spine leading along Adelaide Road into Newtown. There is already a lot of growth occurring in Te Aro. The Operative District Plan heights for Te Aro do not respond to the scale of intensification and density anticipated under the City Centre Zone nor the growth needs.</p>
<b>Maximum Building Height Standard</b>	The Trustees of the Eldin Family Trust - Sir Douglas John White	589.1	CCZ-S1	<p>Height restriction matters specific to 9 Selwyn Terrace</p> <ul style="list-style-type: none"> <li>- The Spatial Plan proposes to impose a minimum building height of 6 storeys on new buildings in the Central Area. Selwyn Terrace is proposed to become part of the Central Area.</li> <li>- These proposed minimum heights conflict with height restrictions currently imposed on two properties, 23 Selwyn Terrace and 54 Hill Street. The restrictions are imposed by registered covenants, which would prevent development of these properties to the proposed 6 storey minimum (without the agreement of the owners of the beneficial land).</li> <li>- The effect of the covenant on the title of 23 Selwyn Terrace is that any new or existing buildings at - Selwyn Terrace must not exceed a height of 48.16 metres above the Wellington City Datum 1953 (mean sea level).</li> <li>- The effect of the covenant on the title of 54 Hill Street is that any new or existing buildings at 54 Hill Street must not exceed a height of 48.81 metres above the mean sea level.</li> <li>- A building height of 6 storeys would exceed these restrictions.</li> <li>- Both of these covenants are for the benefit of 9 Selwyn Terrace. If the owner(s) of 23 Selwyn Terrace or 54 Hill Street wanted to build higher than the current height restrictions, the owner(s) of 9 Selwyn Terrace would need to agree to discharge the covenant from the relevant title.</li> <li>- The minimum height of 6 storeys is therefore inappropriate for 9 Selwyn Terrace and its two neighbouring properties as this would be subject to these covenants. Rather, an Inner</li> </ul>			<p><b>No change.</b></p> <p>The height discussed in the submission of 48.16m is above minimum height which the submitter is concerned about.</p> <p>Whilst the majority of properties on the western and north-western edge of Selwyn Terrace are residential in nature, there are a mixture of uses along the eastern portion of Selwyn Terrace and the surrounding area more widely. This includes the British High Commission, The Catholic Institute of Aotearoa NZ, and St Mary’s College.</p> <p>The height limit for Selwyn Terrace and the surrounding area is 27m (roughly 8 stories). This is only an extra 7m from what would be allowed under the High-Density Residential Zone alternative for this site.</p>

				<p>Residential zone and Pre-1930s Character Overlay would better align with the constraints imposed through property law.</p> <p>Is it necessary to sacrifice heritage?</p> <p>- I understand that Wellington needs to change in order to accommodate its growing population, and that government direction obliges the Council to plan for these changes. I also accept that people now desire a wider range of housing options than was the case in the past. I support the Council's efforts to start a conversation about these issues.</p> <p>- As the COVID-19 pandemic has demonstrated, however, the ways in which society lives and works can change quickly and in unexpected ways.(12) A greater number of people have found that working from home suits their lifestyle, and are continuing to do this on a full or part time basis. As a consequence, the demand for office space in Wellington has reduced. These changes present an opportunity to repurpose existing office and parking buildings for residential purposes.</p> <p>- The pandemic has also demonstrated that heritage and character buildings and spaces are valued by the whole community — not just those who live in them. They create interest, delight, and visual variation to those who live and work nearby. Those qualities are all the more important during times when travel is restricted.</p> <p>- In my view the recent changes to our working styles and available sites elsewhere will free up more than enough residential space. It is not necessary to sacrifice the history and special character of our City in order to provide sufficient housing. A blanket requirement for six storey apartment buildings is not warranted.</p>			
<b>Maximum Building Height Standard</b>	Guy Marriage	829.1	CCZ-S1	Disagree with height in location G) – this should still be 27m max height in Te Aro unless on Taranaki St.		Seeks change to Te Aro Heights.	<p><b>No change.</b> Submitters concern is acknowledged. However, no change to the height limit for Te Aro. The Low City concept was a concept that existed before the introduction of the NPS-UD and without the growth pressures felt today, as well as before Let's Get Wellington moving MRT routes were proposed.</p> <p>The Spatial Plan signals Te Aro as an area of growth and it will be on a key future LGWM MRT spine leading along Adelaide Road into Newtown. There is already a lot of growth occurring in Te Aro. The Operative District Plan heights for Te Aro do not respond to the scale of intensification and density anticipated under the City Centre Zone nor the growth needs.</p>

<p><b>Maximum Building Height Standard</b></p>	<p>Matthew Plummer</p>	<p>951.1</p>	<p>CCZ-S1</p>	<p>While I support the concept of height limits across the city, the proposed limits for the commercial heart of the city (roughly the area covered by Lambton Quay, Lower Willis Street, the land side of Jervois and Customhouse Quay, and up to Bunny Street) are inconsistent and too conservative.</p> <ul style="list-style-type: none"> <li>• In particular, the land south of the railway station (Featherston St and the Quays) is high value, close to a major public transport hub, and has a number of 90+ metre high buildings already in place - yet the limits seem to be arbitrarily low, at 60 metres and 75 metres. A mechanism for developers being able to push higher than this would make sense, as high quality, resilient structures will help bring people back into the CBD.</li> <li>• The height limits should not impose an arbitrary barrier to the best use of the land in Wellington's CBD, and progress in structural engineering and earthquake-resilient design has opened the door to new buildings that are taller and more resilient than previously possible, and would increase the rates paid to WCC by their owners.</li> </ul>				<p><b>No change.</b> Councillors voted to retain City Centre maximum height limits as part of the Spatial Plan approval. Heights have increased in parts of the City Centre Zone. In addition, Council's monitoring has shown that there has been significant under-development to date in the City Centre with the majority of buildings being built below the maximum building height which indicates that these maximum building heights are largely appropriate to retain apart from Te Aro.</p> <p><b>No change apart from the increase in maximum building heights</b> in one block in Te Aro along the South-East zone extent from 28.5m to 42.5m.</p> <p>In addition, the rule framework is enabling with no public notification for maximum height breaches and the introduction of the City Outcomes Contributions which allow for height exceedances beyond the maximum height.</p>
<p><b>Maximum Building Height Standard</b></p>	<p>United States Embassy – Chris Pritchard</p>	<p>89.1</p>	<p>CCZ-S1</p>	<p>The Embassy wishes to make a submission on rezoning of the area in which the Embassy is located, as the Draft District Plan proposes to rezone the area from an "Inner Residential Zone" (as zoned by the Operative Wellington District Plan) to a "City Centre Zone". In particular, the Embassy opposes both the increase in height limits, and the minimum heights for new buildings proposed for the land that is adjacent to the Embassy.</p> <p>In terms of the increase in height limits, standard CCZ-S1 (Maximum Height) in the Draft District Plan provides that the height limit for the properties surrounding the Embassy will be 27 metres. It is understood that CCZ-R19 means that construction of a building that complies with that height standard (and the other matters in that rule) will be a permitted activity and will not require resource consent (though note that resource consent may be required for other matters under the District Plan).</p> <p>...</p> <p>For security reasons, the Embassy has serious concerns about any property adjacent to the Embassy being able to build new buildings to 27 metres, particularly without any requirement for</p>				<p><b>No change.</b> Council understands the embassies concerns. Based on numerous reasons detailed in this table already Council has decided to rezone the land surrounding the Embassy (Hobson Street and Hobson Crescent) from City Centre Zone to High Density Residential Zone. The area is in the city centre walking catchment so has to have a maximum height limit of 21m as it will under the Proposed Plan. This represents a drop in height from 27 to 21m.</p> <p>As noted the MDRS standards have now been implemented.</p>

				<p>the Embassy to be notified of the proposal. This concern is also relevant to the minimum height of 21 metres for new buildings.</p> <p>Under the operative Wellington City Council District Plan, the maximum height for buildings in the Inner Residential Area zone is 10 metres (Standard 5.6.2.5.), with no minimum height specified. The Embassy would be comfortable with this height limit continuing to apply for those buildings surrounding the Embassy.</p> <p>The Embassy therefore wishes to indicate that it intends to make submissions opposing the new building height limit and minimum height for new buildings at the relevant properties through the formal district plan review process, should they be retained in the proposed District Plan. Attached to this submission is a map which outlines in red the land to which the Embassy would like the 10 metre height limit for buildings to remain.</p> <p>The Embassy acknowledges that the Resource Management (Enabling Housing and Other Matters) Amendment Bill is currently going through Parliament, and that the Medium Density Residential Standards proposed would permit dwellings up to three stories in height in all 'relevant residential zones'. The Embassy understands the properties listed above would be subject to those Standards if the Bill is passed into legislation in its current form. The Embassy would be happy to provide further detail as to the particular provisions in the Draft District Plan that we would like to see amended if that would assist.</p> 			
<p><b>Maximum Building Height Standard</b></p>	<p>Stratum Management Ltd – Craig Stewart</p>	<p>1115.8</p>	<p>CCZ-S1</p>	<p>Willis and Victoria Street Height Change</p> <p>Stratum seeks that the height limit for the following block be increased from 28.5m to 42.5m.</p> <p>Such a change will be more consistent with the blocks to the north and east, still allows for a transition to a lower City Centre height to the south and west, allows for the continued redevelopment of the area along Willis Street and Victoria Street which have been experiencing significant change in recent years, and better gives effect to the direction of the NPS-UD to maximise development capacity.</p>			<p><b>Change made.</b> Council has reviewed the height for this block and decided it is appropriate to increase the height to 42.5m. Council is seeing an uptake in development along Victoria Street and it is a natural extension of the high city back. The blocks to the north and east are 42.5m so it is in keeping with this. This still allows for a reduced height down to 28.5m to the West and South of this block to</p>

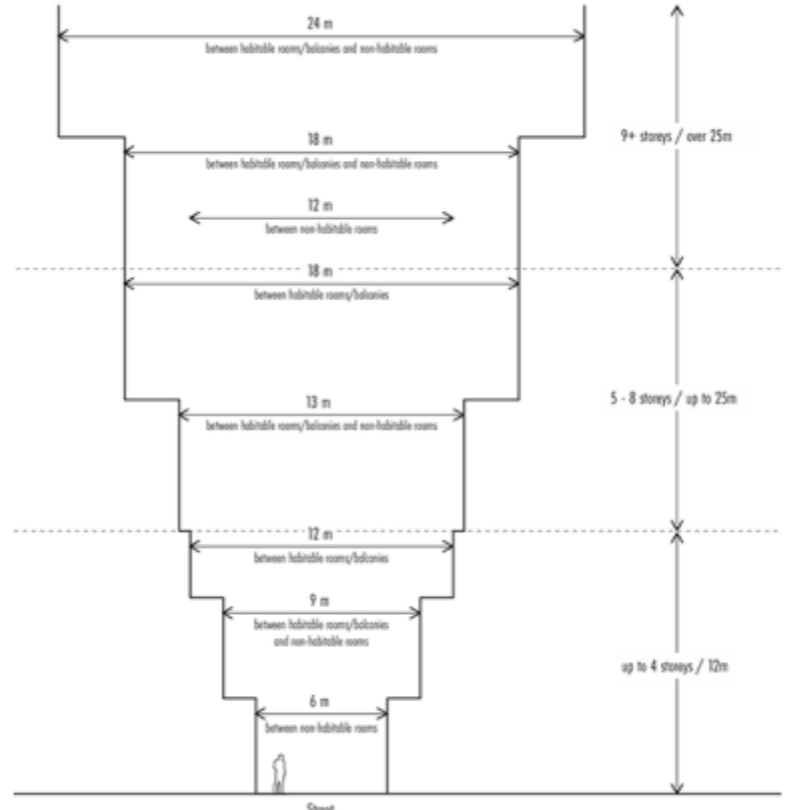
							transition to surrounding residential zones.
<b>Maximum Building Height Standard</b>	Argosy NO1 Property Ltd	881.1	CCZ-S1	<p>Argosy seeks for height limit for 360 Lambton Quay to reflect the height of the existing building</p> <p>5.6 The Draft Plan provides the following height limits in CCZ-S1:</p> <p>(a) 7 Waterloo Quay – 60m;</p> <p>(b) 143 Lambton Quay – 50m;</p> <p>(c) 147 Lambton Quay – 75m;</p> <p>(d) 15 Stout Street – 50m;</p> <p>(e) 8 Willis Street – 95m; and</p> <p>(f) 360 Lambton Quay – 12m.</p> <p>5.7 The current height of the building at 360 Lambton Quay is approximately 15.5m, which is lower than the permitted height under the Draft Plan.</p> <p>5.8 Argosy seeks for the height limit at 360 Lambton Quay to be increased to 16m.</p> <p>Argosy otherwise supports the height limits in the Draft Plan for its sites and seeks for those height limits to be retained.</p>		Seeks height change for 360 Lambton Quay.	<b>Change made.</b> Council agrees that the height limit is not correctly referenced in the Draft District Plan height layer. This has been increased to 15.5m to reflect the height of the building as per standard HH-S4.
<b>Maximum Building Height Standard</b>	Fabric Property Limited - Bianca Tree	1139.4	CCZ-S1	<p>Height limits in the City Centre zone</p> <p>8.3 Fabric seeks amendments to CCZ-S1 to provide unlimited building heights in the City Centre zone as it applies to the “High City” area that was identified in the Wellington Spatial Plan, and as it applies to 22 The Terrace, 1 Grey Street, 20 Customhouse Quay, and 215 Lambton Quay.</p> <p>8.4 Policy 3 of the NPS-UD requires district plans of Tier 1 urban environments such as Wellington to enable “building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification” in city centre zones. We interpret this to mean that the City Centre, or at minimum parts of the City Centre, should have no maximum building heights.</p> <p>8.5 Unlimited building heights in the central City Centre area are appropriate given the emphasis in the Spatial Plan and Draft Plan on the City Centre for accommodating future growth, recognising the height of existing buildings in these areas, and taking into account the absence of any directly adjoining residential areas that could potentially be adversely affected.</p>			<p><b>No change made re unlimited heights.</b> Councillors voted to retain City Centre maximum height limits as part of the Spatial Plan approval. Heights have increased in parts of the City Centre Zone. In addition, Council’s monitoring has shown that there has been significant under-development to date in the City Centre with the majority of buildings being built below the maximum building height which indicates that these maximum building heights are largely appropriate to retain apart from Te Aro.</p> <p><b>No change apart from the increase in maximum building heights</b> in one block in Te Aro along the South-East zone extent from 28.5m to 42.5m.</p> <p>In addition, the rule framework is enabling with no public notification for</p>



								maximum height breaches and the introduction of the City Outcomes Contributions which allow for height exceedances beyond the maximum height.
<b>Old ST Paul's View Protection Standard</b>	Guy Marriage	829.1	CCZ-S2	Agree. It is notable that an ex church gets more recognition and sunlight than a live human being.				<b>No change.</b> Support noted. No response needed.
<b>Old ST Paul's View Protection Standard</b>	D B McKAY, Thorndon Society	581.1	CCZ-S2	Comparing the special protections for Old St Paul's in the Operative District Plan and the Draft District Plan reveals that the at grade view controls along Mulgrave Street appear to have been deleted. These controls were established as a result of a Planning Tribunal decision in the 1980s. They are designed to enhance the view of Old St Paul's, one of Wellingtons most iconic heritage buildings, and must be retained.				Council did not intend to remove the at grade view controls along Mulgrave Street, this was an error in the diagram and text of the standard and will be corrected.
<b>Old ST Paul's View Protection Standard</b>	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	CCZ-S2	HNZPT supports the site specific height limits (height control plane)in the vicinity of Old St Pauls.  However the third point of this standard does not protect the views of Old St Pauls when approaching the church from both directions on Mulgrave Street. HNZPT submits that the building line restriction as currently written in the Operative District Plan (Rule 13.6.3.1.8) is retained in the District Plan.				
<b>Character Precincts – Adjoining Site Specific Building Height Control Standard</b>	Guy Marriage	829.1	CCZ-S3	Agree. It is notable that a heritage property gets more recognition and sunlight than a live human being.				<b>No change.</b> Support noted. No response needed.
<b>Character Precincts – Adjoining Site Specific Building Height Control Standard</b>	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	CCZ-S3	HNZPT supports this standard controlling heights on sites adjoining character precincts.				<b>No change.</b> Support noted. No response needed.
<b>New Standard proposed</b>	Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui	1116.18	New Standard	HNZPT supports the height controls in relation to character precincts and the site-specific control for Old St Paul's (CCZ-S2 and CCZ-S3). However, there should also be a height control standard for sites adjoining other heritage buildings and heritage areas.  This could be drafted in a similar format and content to CCZ-S3, but it would apply to scheduled heritage buildings, items, and areas. Assessment criteria would include effects on heritage values of the adjacent scheduled heritage. Rules CCZ-R18, CCZ-R19 and CCZR21 would also need to be amended to refer to this new standard.				<b>Change made.</b> Council has added heritage areas to CCZ-S3 so that the standard refers to Character Precincts and Heritage Areas.
<b>Amendment to Character Precincts Standard</b>	Tracey Paterson, Jeremy Young	29.1, 286.1	CCZ-S3	<b>Amendments - the draft plan should be amended as follows:</b>  It is not clear to me how best to amend the district plan to take into account the sediment issue. I will leave this to geo-technical advice from the appropriate engineers.				<b>Some changes made but no reduction in height or zone change to Kent and Cambridge Terrace.</b>

				<p><b>Amend</b> Policy CCZ-05: Sub-clause 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to tangata whenua.</p> <p>Policy CCZ-P5: <b>Add</b> new sub-clause 3: “Ensuring an appropriate scale of development where the CCZ interfaces with heritage areas and residentially zoned areas”</p> <p>Rule CCZ-S3. <b>Amend</b> rule to state</p> <p>Identified character precinct:</p> <p>For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p>Add <b>new rule</b> (to follow CCZ-S3).</p> <p>CCZ-SX – Heritage Areas in MDRZ – adjoining site specific building height Identified heritage area:</p> <p>For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p><b>Amend</b> rule CCZ-S5 Minimum height to ensure compliance with changes above.</p>			<p>6 storey heights are enabled along Mount Victoria under the High Density Residential Zone provisions. This is a 2 storey height difference between the CCZ’s 28.5m and HDRZ’s 21m height. Sunlight modelling is underway to model these effects.</p> <p>Comfortable with proposed change to CCZ-05.</p> <p>No change to CCZ-P5 as this is addressed in CCZ-P10.2.</p> <p>Regarding CCZ-S3 the standard will be changed to apply to Character Precincts and Heritage Areas to capture the intent of the proposed new rule in the submission point.</p> <p>There is a sloping topography from Kent Terrace upwards which makes the properties in Moir Street etc. Higher and reduces the impact of the edge treatment somewhat. However, Council has listened to concerns and given that Moir Street is the only character precinct which abuts the City Centre Zone Council considers that it is appropriate to reduce the recession plane height from 12m to 8m. This also aligns with the approach taken in the High Density Residential Zone for sites adjacent to Character Precincts where Council has reduced the height of the recession plane. It is appropriate that the height for the City Centre Zone is 3m higher than the Height of the High Density Residential Zone because the zones have different purposes, density expectations and NPS-UD direction.</p> <p>Amend CCZ-S3 as follows:</p>
<b>Amendment to Character Precincts Standard</b>	Jeremy Young	286.1	CCZ-S3	<p>This submission focuses on the impact the City Centre Zone (CCZ) rules have in relation to adjoining Moir St, Mt Victoria (not just character area but also proposed HERITAGE area)</p> <p>....</p> <p>Issues with draft district plan</p> <p>The draft District Plan rules will fail to protect the character and heritage values of Moir St and do not align with the objectives and policies of the plan which seek to protect the important character and heritage areas and values of the City from inappropriate development and design. The rules will also not encourage or enable development in line with the draft Heritage design guides, in particular policies G8-G12.</p> <p>This is due to the draft rules for the Central City Zone (CCZ) on the eastern side of Hania St allowing very high buildings (up to 28.5m high) directly to the rear of the homes on Moir St. The outcome would be a wall of 8 storey builds directly overlooking and dominating 1-2 storey cottages.</p> <p>Such development would have a significant adverse effect on the character, heritage and amenity of houses on both sides of Moir St. This includes loss of sunlight, overlooking, shading, wind, overdominance of building form and loss of privacy. The draft district plan needs to acknowledge and respond to this very sensitive boundary transition in order to avoid detriment to the heritage and character area of Moir St.</p>			

				<p>A similar principle also needs to be applied at the interface of the CCZ and MDRZ. Grounds for amendments required to draft District Plan:</p> <p>Amendments are required to the draft policies and rules as well as new rules are required for the CCZ. This would only have impacts on small number of properties on the eastern side of Hania St adjacent to Moir St. The changes proposed will help to ensure an appropriate level of development which respects and responds to the character and heritage value of Moir St.</p> <p>The amendment required will help ensure that the CCZ rules align with the policies and objectives of the plan and draft heritage design guide. These seek to protect the important heritage and character values of the City.</p> <p>In relation to the CCZ there is an overall policy goal to ensure there are "...measures to manage activities and development that have the potential to adversely affect public and private amenity or to create reverse sensitivity effects, including along the boundary with adjoining residentially zoned areas...".</p> <p>The draft plan includes policies CCZ-07, CCZ-P10 and CCZ-P13 which specifically seek to ensure adverse effects from scale and dominance of new buildings are managed in the CCZ where this zone interfaces with heritage areas and with residentially zoned areas. To give effect to this intent, the following amendments are required to the draft policies and rules:</p> <p>[See amendments suggested in submission above]</p>				<p><b>CCZ-S3 Character Precincts and Heritage Areas – Adjoining Site Specific Building Height</b></p> <p>Identified character precinct:</p> <p>2. For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may project beyond a line of 60° measured from a height of 42m <del>8m</del> above ground level from all side and rear boundaries that adjoin that precinct.</p>
<b>Amendment to Character Precincts Standard</b>	Karen and James Fairhall	907.1	CCZ-S3	<p>3. Rule CCZ-S3. <b>Amend</b> rule to state Identified character precinct:</p> <p>For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure <u>may be higher than 8m high within 5m of the adjoining boundary or project</u> beyond a line of 60° measured from a height of <u>8m</u> above ground level from all side and rear boundaries that adjoin that precinct.</p>				
<b>Add a new rule – Edge treatment adjacent to a heritage building</b>	Karen and James Fairhall	907.1	CCZ-S3	<p>4. <b>Add</b> new rule (to follow CCZ-S3).</p> <p>CCZ-SX – Heritage Areas in MDRZ – adjoining site specific building height Identified heritage area:</p> <p>For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure <u>may be higher than 8m high within 5m of the adjoining boundary or project</u> beyond a line of 60° measured from a height of <u>8m</u> above ground level from all side and rear boundaries that adjoin that precinct.</p>				
<b>Street Edge Height Standard</b>	Argosy NO1 Property Ltd	881.1	CCZ-S4	<p>Argosy opposes the street edge height controls</p> <p>5.9 Standard CCZ-S4 of the Draft Plan provides that the street edge height of any new building or addition to an existing building must not exceed a height of 16m or the width of the street (whichever is greater) for the first 4m of frontage depth. This control applies to the following sites:</p> <p>(a) 143 Lambton Quay;</p>				<p>On the back of submissions regarding the Street Edge Height control Council undertook further analysis work.</p> <ul style="list-style-type: none"> <li>Modelling by the Council's Urban Design team was undertaken to understand the sunlight effects</li> </ul>

				<p>(b) 15 Stout Street; and</p> <p>(c) 8 Willis Street / 360 Lambton Quay.</p> <p>5.10 We understand the intention of this rule is to provide building setbacks on narrow streets to increase light. However this rule is not effective, due to the analogous requirement to provide verandas. The rule also restricts efficient building design.</p> <p>5.11 Argosy seeks for standard CCZ-S4 and the corresponding map to be deleted.</p>			<p>from the DDP's proposed Street Edge Height control.</p> <ul style="list-style-type: none"> <li>The model compared three scenarios for the control on Haining Street (an identified narrow street). The three scenarios included: <ul style="list-style-type: none"> <li>A 42m max. height with no setback (sans Street Edge Height control)</li> <li>A 42m max. height with 4m setback (as per DDP Street Edge Height control)</li> <li>A 42m max. height with 3m setback (to understand if a reduced setback, to provide for more development, still enabled good outcomes).</li> </ul> </li> </ul> <p>The modelling showed that minimal sunlight access was provided in all three scenarios.</p> <p>On the back of this modelling work, Council decided to remove the Street Edge Height as it wasn't able to achieve the benefits sought regarding sunlight access.</p>
Street Edge Height Standard	Guy Marriage	829.1	CCZ-S4	<p>I applaud that the setback distance of 4m each side has been brought in for narrow streets under 21m wide, but would note that this has little effect when several Te Aro streets are in the region of only 8m - 10m wide. I would refer the drafters of the District Plan to the Sydney Design Guide, which has multiple setbacks, as shown in the accompanying diagram.</p>  <p><b>Figure 2 – Sydney Design Guide. Setbacks.</b></p>			
Street Edge Height Standard	Guy Marriage	829.1	CCZ-S4	Agree, but request that it be extended further as per Sydney.			
Street Edge Height Standard	Stratum Management Ltd – Craig Stewart	1115.1	CCZ-S4	Section CCZ-S4 requires a set back a minimum of 4m from the street frontage once the building height exceeds 16m, or the width of the street. When considering a typical apartment (or commercial) building design, this 4m set back will impact the efficiency, and therefore cost of the building structure.			

				<p>Structural efficiency in a multistorey building is reliant on the structure being well distributed and vertically aligned through the building. In a shear wall apartment building structure, the lateral system is typically inset from the building façade on the street frontages of the building. The available locations for this structure need to then align with a rational apartment layout.</p> <p>A 4m set back on the building façade causes significant issues with apartment layouts in this case as the walls would need to be set at least 8m back into the building to avoid the façade at the upper levels. In many cases this will mean an inefficient structure, resulting in larger walls and potential need for frames to control torsional drifts in a building, driving the construction costs up.</p> <p>Recently, there has been a number of buildings built with a structural steel bracing system located on the façade of the building. We have recently been investigating a similar system to be fabricated in engineered timber to provide more sustainable building solutions. A perimeter braced structure is a very efficient structural form but relies on the bracing being on the outer edge of the building to avoid braces being located within apartment spaces.</p> <p>The proposed 4m setback will not allow this to occur or would require significant transfer structures at the set back location which would be uneconomical in most cases. It is my view that the proposed rules for Section CCZ-S will add significant cost to design of multistorey buildings in Wellington.</p>			
<b>Street Edge Height Standard</b>	Stratum Management Ltd – Craig Stewart	1115.1	CCZ-S4	<p>This standard is opposed. It will impose significant building engineering costs on a new building proposal, adding significant design complexity and cost, and potentially making it impossible to affordably design a building. These costs in turn will either be passed on and thereby impact on affordability, or it will mean buildings will not be viable for construction.</p> <p>The standard should be removed. A supporting letter from Aurecon is provided with this submission.</p>			
<b>Street Edge Height Standard</b>	Fabric Property Limited - Bianca Tree	1139.4	CCZ-S4	<p>Street Edge Height Controls</p> <p>8.7 Fabric opposes the Street Edge Height Control as set out in CCZ-S4, particularly in relation to additions to existing buildings. This standard will constrain new development capacity in the city centre and require inefficient building design.</p> <p>8.8 As drafted, it also contradicts other provisions of the City Centre Zone such as verandah requirements and minimum building heights which will have the effect of blocking light to the street. Therefore, this standard will not achieve its intention of managing scale and dominance effects on the streetscape.</p> <p>8.9 Accordingly, Fabric seeks that CCS-S4 is deleted.</p>			
<b>Minimum Building Height Standard</b>	Guy Marriage	829.1	CCZ-S5	<p>Agree with 21.5m except on small side streets, where it may be better to be lower in height.</p>			<p><b>No change other than to bring the minimum height to 22m to correct an error of using 21.5m.</b> Support noted. Council needs to enable six storey given the walking catchment</p>



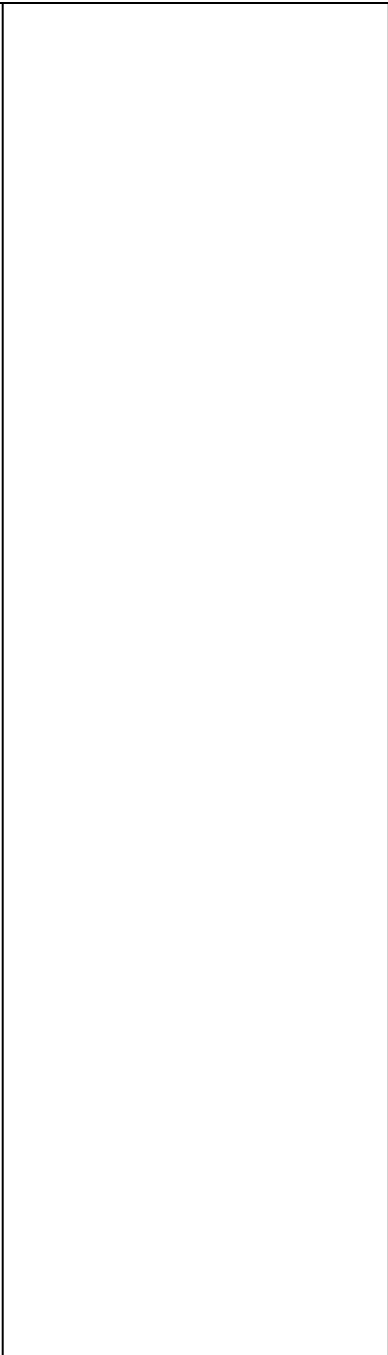

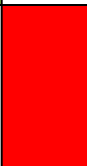





							requirement for six storeys so it will stay at 22m.
<b>Minimum Building Height Standard</b>	Su-Wuen Ong	813.1	CCZ-S5	<p>City Centre - Agree about the 6 storey minimum to have a compact and sustainable city. As part of that, maybe you should actively encourage more building or conversion to apartments of all sizes and costs. You should do more active than just "discouraging" ground-level parking. Doing more will appear the mode change to active forms of transportation.</p>			<b>No change.</b> Support noted. Building conversion is enabled through the policy and rule framework.
<b>Minimum Building Height Standard</b>	Stratum Management Ltd – Craig Stewart	1115.1	CCZ-S5	<p>Section CCZ-S5 notes a minimum structure height of 21.5m, which we note is above the height where a setback is required. For buildings that just meet this minimum height, a set back upper floor would be required and, further to the discussion above would have issues with maintaining an efficient structural system. This would lead to different structural system, or curtailed system, becoming more common for the upper floors of 4-6 storey buildings to allow for the required setback in conjunction with this minimum height.</p> <p>Both a new or curtailed system is likely to result in a significant difference in stiffness between the floors at the level, leading to the upper floor being required to be considered a "part" in accordance with NZS1170.5 and subject to significantly higher lateral loading. This would add significant cost to the building at this level when compared to being a continuous lateral system from below.</p> <p>As written, Section CCZ-S5 will force developers to build inset upper floors that will be inefficient both in terms of spatial use and structural form.</p>			<b>Change made.</b> See previous comments a few rows up. Street Edge Height control removed.
<b>Minimum Building Height Standard</b>	Tracey Paterson	29.1	CCZ-S5	<p><b>Amendments - the draft plan should be amended as follows:</b></p> <p>It is not clear to me how best to amend the district plan to take into account the sediment issue. I will leave this to geo-technical advice from the appropriate engineers.</p> <p><b>Amend</b> Policy CCZ-05: Sub-clause 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to tangata whenua.</p> <p>Policy CCZ-P5: <b>Add</b> new sub-clause 3: "Ensuring an appropriate scale of development where the CCZ interfaces with heritage areas and residentially zoned areas"</p> <p>Rule CCZ-S3. <b>Amend</b> rule to state</p> <p>Identified character precinct:</p> <p>For any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p>Add <b>new rule</b> (to follow CCZ-S3).</p> <p>CCZ-SX – Heritage Areas in MDRZ – adjoining site specific building height Identified heritage area:</p>			<p><b>Some changes made but no reduction in height or zone change to Kent and Cambridge Terrace.</b></p> <p>6 storey heights are enabled along Mount Victoria under the High Density Residential Zone provisions. This is a 2 storey height difference between the CCZ's 28.5m and HDRZ's 21m height. Sunlight modelling is underway to model these effects.</p> <p>Comfortable with proposed change to CCZ-05.</p> <p>No change to CCZ-P5 as this is addressed in CCZ-P10.2.</p> <p>Regarding CCZ-S3 the standard will be changed to apply to Character Precincts and Heritage Areas to capture the intent of the proposed new rule in the submission point.</p>

				<p>For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p> <p><b>Amend</b> rule CCZ-S5 Minimum height to ensure compliance with changes above.</p>			<p>There is a sloping topography from Kent Terrace upwards which makes the properties in Moir Street etc. Higher and reduces the impact of the edge treatment somewhat. However, Council has listened to concerns and given that Moir Street is the only character precinct which abuts the City Centre Zone Council considers that it is appropriate to reduce the recession plane height from 12m to 8m. This also aligns with the approach taken in the High Density Residential Zone for sites adjacent to Character Precincts where Council has reduced the height of the recession plane. It is appropriate that the height for the City Centre Zone is 3m higher than the Height of the High Density Residential Zone because the zones have different purposes, density expectations and NPS-UD direction.</p> <p>Amend CCZ-S3 as follows:</p> <p><b>CCZ-S3 Character Precincts and Heritage Areas – Adjoining Site Specific Building Height</b></p> <p>Identified <a href="#">character</a> precinct:</p> <p>3. For any <a href="#">site</a> adjoining a <a href="#">site</a> identified within a <a href="#">Character</a> Precinct: no part of any <a href="#">building</a>, <a href="#">accessory building</a> or <a href="#">structure</a> may project beyond a line of 60° measured from a <a href="#">height</a> of <del>12m</del> <b>8m</b> above <a href="#">ground level</a> from all side and rear boundaries that adjoin that precinct.</p>
<b>Minimum Building Height Standard</b>	Foodstuffs North Island Ltd	777.17	CCZ-S5	<p>OPPOSE</p> <p>Provisions should be more streamlined. The basic bulk and location controls should apply to all Commercial and Mixed Use zoned sites however it is unnecessary to have a 'Minimum building height' standard. More appropriate to have within the Design Guide or as matters of discretion.</p>			<p><b>No change.</b> Council requires a minimum building height to ensure efficient use of sites as well as to match the walking catchment 6 storey requirement.</p>

<b>Amendment to Minimum Building Height Standard</b>	Karen and James Fairhall	907.1	CCZ-S5	<p>5. Amend rule CCZ-S5 Minimum height to ensure compliance with changes above.</p> <p>Other matters</p> <ul style="list-style-type: none"> <li>• <u>Waste water</u></li> </ul> <p>Moir St / Hania St is one of the lowest areas of Mt Victoria. We suffer from flooding and sewerage overflows in heavy rain events. Before any significant development is enabled along Hania St sufficient stormwater / waste water capacity will be required.</p> <ul style="list-style-type: none"> <li>• <u>Parking</u></li> </ul> <p>Moir St is a very narrow 19th century one laned road which acts as a shared space for walking, bikes, scooters and cars. This road has no capacity for additional residential car parking or traffic. Any new development in the area (including Hania St) will need careful controls on allowance to on-street parking permits.</p>				<b>No change.</b> Council requires a minimum building height to ensure efficient use of sites as well as to match the walking catchment 6 storey requirement.
<b>Minimum Ground Floor Height Standard</b>	Guy Marriage	829.1	CCZ-S6	Agree				<b>No change.</b> Support noted. No response needed.
<b>Sunlight Protection Standard</b>	Guy Marriage	829.1	CCZ-S7	Agree, but request that the Council be proactive on this Policy, particularly around Swan Lane (future public square).				<b>No change.</b> Support noted. No response needed.
<b>Support for Verandah Standard</b>	Guy Marriage	829.1	CCZ-S8	Agree.				<b>No change.</b> Support noted. No response needed.
<b>Amendments to Verandah Standard</b>	Z Energy	1101.5	CCZ-S8	<p>CCZ-S8 Verandahs relate to specific sites identified on the Planning Maps with a 'verandah control'. The performance standard would apply if Z Energy was seeking consent for a building or structure, and requires a verandah to extend the full width of the building elevation. This is not practical in the context of a service station, where the buildings on the site are usually a canopy over the refuelling area and the ancillary retail building to one side or to the rear. Greater recognition of these existing activities and their operational and functional requirements that prevent compliance is needed, noting the investment associated with the existing commercial activities, the benefits they provide to the community and the need for them to be maintained and upgraded from time to time.</p> <p><b>Amend</b> performance standard CCZ-S8 to acknowledge that in some circumstances it may not be appropriate for verandahs to be provided on building elevations as follows:</p> <ol style="list-style-type: none"> <li>1. Verandahs must be provided on building elevations on identified street frontages <u>except where there is a functional requirement for a building to not contain a verandah.</u></li> <li>2. Any verandah must: <ol style="list-style-type: none"> <li>a. Extend the full width of the building elevation;</li> <li>b. Connect with any existing adjoining verandah;</li> <li>c. Have a minimum clearance of 2.5m directly above the footpath or formed ground surface;</li> </ol> </li> </ol>				<b>No change.</b> Council anticipates development building up to the street edge in achieving efficient use of land. If these requirements are not met they are considered in the resource consent process.



				<p>d. Not exceed a maximum height of 4m measured between the base of the verandah fascia and the footpath or formed ground surface directly below;</p> <p>e. Be setback a minimum of 450mm from any point along the kerbing extending back to the site boundary;</p> <p>and f. Not exceed a maximum width of 3m from the front of the building.</p> <p><b>OR amend</b> the applicability statement as follows</p> <p>This standard does not apply to:</p> <p>a. Any scheduled building identified in SCHED1 - Heritage Buildings;</p> <p>b. Any building where compliance with the standard results in an encroachment into the dripline of an existing street tree.</p> <p><u>c. Service stations</u></p> <p><b>And amend</b> the assessment criteria against Standard CCZ-S8 to include:</p> <p><u>3 – the extent to which there is a functional requirement for a building to not contain a verandah.</u></p>			
<b>Amendments to Active Frontage Control Standard</b>			CCZ-S9	<p>Argosy seeks amendments to make the active frontages control more workable</p> <p>5.12 The Draft Plan maps show that 7 Waterloo Quay is subject to the active frontages control on the Whitmore Street and Waterloo Quay frontages.</p> <p>5.13 Control CCZ-S9.1.a provides that any new building or addition to an existing building adjoining an identified street with an active frontage control must be built up to the street edge on all street boundaries and along the full width of the site bordering any street boundary.</p> <p>5.14 We consider that this control is overly restrictive and fails to recognise that there are robust reasons for a frontage to not be built up to the street edge along the full width of the site. For example, there may be a need for a vehicle or pedestrian entrance or public space.</p> <p>5.15 Argosy seeks that control CCZ-S9.1.a is amended as follows:</p> <p>“Be built up to the street edge <del>on all street boundaries and along the full width of the site bordering any street boundary, excluding vehicle and pedestrian access and public open spaces.</del>”</p>			<b>No change.</b> The standard applies to a building up to the street edge. This does not apply to vehicle and pedestrian access or public open space because these don't include buildings. It only applies to where a building is proposed.
<b>Amendments to Active Frontage Control Standard</b>	Foodstuffs North Island Ltd	777.27	CCZ-S9	<p>Provisions should be more streamlined. The basic bulk and location controls should apply to all Commercial and Mixed Use zoned sites however 'Active frontage controls' are overly prescriptive'. More appropriate to have within the Design Guide or as matters of discretion. In our experience, centres and commercial areas have a mixture of street typologies. Most have at least one main shopping street and while it is appropriate that these streets have high levels of activation, there are secondary frontages or streets are less important retail streets and have lower levels of pedestrian activity.</p>			<b>No change.</b> Active Frontages are fundamental for enabling attractive, safe and vibrant streets and will be retained.

<p><b>Amendments to Active Frontage Control Standard</b></p>	<p>Z Energy</p>	<p>1101.5</p>	<p>CCZ-S9</p>	<p>Amendments to similar effect are required in relation to CCZ-S9 Active Frontage Control which requires that buildings are built up to the street edge along the full width of the site, that glazing is provided and that the principal entrance is located on the front road boundary.</p> <p><b>Amend</b> performance standard CCZ-S9 to acknowledge that in some circumstances it may not be appropriate for a building to be located on the front boundary of the site or contain 60% glazing, as follows:</p> <p>2. Any new building or addition to an existing building adjoining an identified street with an active frontage control must:</p> <p>a. Be built up to the street edge on all street boundaries and along the full width of the site bordering any street boundary <u>except where there is a functional requirement for that building to be set back from the street edge. In this case, 1b would not apply;</u> and</p> <p>b. Provide a minimum of 60% of continuous display windows or transparent glazing along the width of the ground floor building frontage; and</p> <p>c. Locate the principal public entrance on the front boundary <u>except where there is a functional requirement for the principal entrance to not front the street.</u></p> <p><b>OR amend</b> the applicability statement as follows:</p> <p>Except: This does not apply to any heritage building identified in SCHED1-heritage buildings. <u>This does not apply to service stations.</u></p> <p><b>And amend</b> the assessment criteria against Standard CCZ-S9 to include:</p> <p><u>2 – the extent to which there is a functional requirement for the building to be set back from the street edge.</u></p> <p><u>3 - the extent to which there is a functional requirement for the principal entrance to not front the street.</u></p>				<p><b>No change.</b> Council anticipates development building up to the street edge in achieving efficient use of land. If these requirements are not met they are considered in the resource consent process.</p>
<p><b>Support for Active Frontage Control Standard</b></p>	<p>Guy Marriage</p>	<p>829.1</p>	<p>CCZ-S9</p>	<p>Agree.</p>				<p><b>No change.</b> Support noted. No response needed.</p>
<p><b>Support for Active Frontage Control Standard</b></p>	<p>Wellington City Youth Council</p>	<p>1123.1</p>	<p>CCZ-S9</p>	<p>27. Youth Council believes that by enabling growth within areas of day to day services such as requiring the ground floor of buildings on main streets to be used for businesses, there will be more and better employment opportunities, especially for Rangatahi in our city.</p>				<p><b>No change.</b> Support noted. No response needed.</p>
<p><b>Support in Part for Minimum</b></p>	<p>Kainga Ora</p>	<p>1126</p>	<p>CCZ-S10</p>	<p>Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility.</p>				<p><b>No change.</b> Council seeks to require a minimum unit size for 2+ bedrooms</p>

<b>Residential – Unit Size Standard</b>				Amend CCZ-S10 as follows:  .....  Residential Unit Type: Minimum Net Floor Area a. Studio unit 35m2 b. 1 <u>or more</u> bedroom unit 45m2 c. <del>2+ bedroom unit 55m2</del>			to ensure sufficient amenity and internal space is provided.
<b>Minimum Unit Size Standard</b>	The Property Council	686.1	CCZ-S10	8.3 The Council are looking to introduce minimum unit sizes. Minimum unit sizes, coupled with increased height density, run the risk of buildings that are smaller in floor space but greater in height. This could have adverse design outcomes of small, skinny buildings with less total floor space. We recommend the Council consider the overall design outcomes to ensure no adverse effects occur.			Concern noted. <b>However, no change made.</b> Minimum unit sizes are best practice across NZ Second Generation District Plans.
<b>Support for Minimum Unit Size Standard</b>	Guy Marriage	829.1	CCZ-S10	Agree, totally, completely, utterly. I would note that two-bedroom unit minimum size is recommended to be 70m2, not 55m2. Any minimum you stipulate will in effect become the maximum over time.			Support noted. However, Council considers 70m2 to be too restrictive on developers.
<b>Opposition to Minimum Unit Size Standard</b>	Peter Cockram	1033.1	CCZ-S10	Reduce the barriers to granny flats, auxiliary dwelling units, tiny houses and other forms of low-cost small housing. Remove minimum dwelling size rules - people can see what they're getting.			<b>No change made.</b> Minimum unit sizes are best practice across NZ Second Generation District Plans.
<b>Residential – Outdoor Living Space Standard</b>	Stratum Management Ltd – Craig Stewart	1115.7	CCZ-S11	<p>This standard requires that each residential unit must be provided with an outdoor living space of a minimum size, or that communal living space is provided. In an apartment context, private outdoor living space would be provided in the form of balcony space. There is no equivalent provision currently in the operative District Plan.</p> <p>Stratum has developed various buildings, both with and without balcony space. Our experience suggests that balcony spaces are rarely used in Wellington, often become storage areas, and that they are generally incompatible given typical weather conditions.</p> <p>At a practical level, this requirement will impose additional costs on development. The requirement to provide a 5m2 balcony for an apartment will add an additional \$60,000 to the sale price of each apartment. For an 8m2 balcony, this cost will be in the order of \$100,000. For a typical building of some 100 units, this is a \$10M cost addition. A communal open space of some 150m2 would add about \$2M of cost.</p> <p>This results directly from the construction cost of this additional floor area noting that this is additional to the minimum unit size being required. The requirement will have a significant and direct impact on housing affordability. The provision of communal open space will have a similar effect.</p> <p>Stratum's recent development experience proves that the requirement is not necessary. The provision of Juliet balconies and fully openable sliding doors provide apartments with a strong connection to the outdoors.</p>			<p>Council retains this standard. This standard increases residential amenity and access to outdoor space. There is a deficit in the City Centre Zone of green space and this will help alleviate this for residents.</p> <p><b>Slight tweaks have been made to the wording of the standard</b> to provide clarity to plan users.</p>

				Moreover, the significant amenity provided within the public environment is a driving factor for the growth in central city residents, including public parks, the waterfront, Oriental Bay and Mt Victoria as examples.				
<b>Opposition to Residential – Outdoor Living Space Standard</b>	Kainga Ora	1126	CCZ-S11	Kāinga Ora opposes this standard and considers the City Centre is a zone where it may be appropriate to develop residential units without outdoor living space given the access to public spaces and facilities.  Delete CCZ-S11.				<b>No change. Council retains this standard.</b> This standard increases residential amenity and access to outdoor space. There is a deficit in the City Centre Zone of green space and this will help alleviate this for residents.
<b>Support for Residential – Outdoor Living Space Standard</b>	Guy Marriage	829.1	CCZ-S11	Agree, totally.				<b>No change.</b> Support noted. No response needed.
<b>Opposition to Building Separation Distance Standard</b>	Kainga Ora	1126	CCZ-S12	Kāinga Ora opposes this standard as it constrains design flexibility and it is not clear what positive outcome it achieves.  Deletion sought.				<b>No change. Council retains this standard.</b> This standard tries to alleviate building dominance and shadowing effects from two residential buildings located on the same site.
<b>Support for Building Separation Distance Standard</b>	Guy Marriage	829.1	CCZ-S12	Agree.				<b>No change.</b> Support noted. No response needed.
<b>Opposition to Maximum Building Depth Standard</b>	Kainga Ora	1126	CCZ-S13	Kāinga Ora opposes this standard as it constrains design flexibility and it is not clear what positive outcome it achieves.  Deletion sought.				<b>No change.</b> This standard intends to break up the bulk of buildings so that there is not one continuous building that runs the full length of the site. The benefit it provides is that it reduces privacy, shadowing and building dominance.
<b>Support for Maximum Building Depth Standard</b>	Guy Marriage	829.1	CCZ-S13	Agree.				<b>No change.</b> Support noted. No response needed.

<p><b>Opposition to Maximum Building Depth Standard</b></p>	<p>Fabric Property Limited - Bianca Tree</p>	<p>1139.4</p>	<p>CCZ-S13</p>	<p>Maximum Building Depth</p> <p>8.10 Fabric is opposed to MCZ-S13, which sets a maximum building depth of 20m.</p> <p>8.11 This standard will act as a constraint on appropriate development and design, and it is not clear what positive outcome it achieves.</p>				<p><b>No change.</b> This standard intends to break up the bulk of buildings so that there is not one continuous building that runs the full length of the site. The benefit it provides is that it reduces privacy, shadowing and building dominance.</p>
<p><b>Support in Part for Building Setbacks Standard</b></p>	<p>Kainga Ora</p>	<p>1126</p>	<p>CCZ-S14</p>	<p>Kāinga Ora supports the intent of this standard but consider that it should be framed as ‘outlook space’ for consistency with equivalent provisions in other plans and to clarify the purpose of the standard.</p> <p>Amendments sought.</p> <p>Amend CCZ-S14 as follows:</p> <p>.....</p> <p><del>CCZ-S14 Building Setbacks</del> <u>Outlook space</u></p> <p>1. Living rooms facing onto any non-road boundary must <del>have a setback</del> <u>provide an outlook space of of 3m depth.</u></p> <p>Assessment Criteria where the standard is infringed:</p> <p>1. The extent of dominance and shading related effects on adjoining sites.</p>				<p><b>Changes made.</b> CCZ-S14 Building Setbacks is being altered to be an outlook space standard and the separation reduced between buildings from 3m setback for all living room spaces as in the Draft District Plan to a 1x1 outlook requirement.</p> <p>Amend as follows:</p> <p><del>CCZ-S14 Building Setbacks</del> <u>Outlook space</u></p> <p>1. <u>All habitable rooms</u> <del>Living rooms facing onto any non-road boundary must have a setback</del> <u>Living rooms facing onto any non-road boundary must have an outlook space with a minimum dimension of 1m in depth and 1m in width.</u> <del>setback of 3m.</del></p> <p>Assessment Criteria where the standard is infringed:</p> <p>The extent to which:</p> <p>1. <u>Acceptable levels of natural light are provided to habitable rooms;</u></p> <p>2. The extent of dominance and shading related effects on adjoining sites.</p>
<p><b>Support for Building Setbacks Standard</b></p>	<p>Guy Marriage</p>	<p>829.1</p>	<p>CCZ-S14</p>	<p>Agree.</p>				<p><b>No change.</b> Support noted. No response needed.</p>
<p><b>Design Guides</b></p>	<p>Inner City Wellington (ICW) –</p>	<p>450.1</p>	<p>Design Guides</p>	<p>ICW ABSOLUTELY SUPPORTS the inclusion of the Design Guides into the District Plan because it is essential they have statutory weight to ensure the development of thriving, diverse, sustainable residential communities.</p>				<p><b>No change.</b> Support noted. No response needed.</p>

	voice of Te Aro and Wellington Central						
<b>City Outcomes Contribution</b>	A City for People	1076	City Outcomes Contribution	<p>Support accessibility and Universal Design</p> <p>We welcome the Design Guide policies on accessibility, and support the City Outcomes Contribution consideration of Universal Design. There is a dire shortage of accessible housing. Only 2% of current housing stock is accessible, while one in six people need some adjustment to their house for it to be accessible. Disabled people not only have a right to live in accessible and affordable housing, but should also be able to visit the houses of their friends and family without barriers.</p> <p>We support placing greater weighting on Universal Design in the City Outcomes Contribution, and creating an incentives programme to make lift provision in 3 story development less cost prohibitive. Council should also work with the Government to reform the Building Code to better mandate Universal Design.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>• Place greater weighting on Universal Design in the City Outcomes Contribution</li> <li>• Provide incentives for lifts in 3 story developments</li> <li>• Work with Central Government to reform the Building Code to better mandate Universal Design.</li> </ul>			Support noted. <b>No change.</b> Council supports universal design, however, it does not place the weighting of one outcome above another. Neither does it see it as the right place to provide incentives for lifts.
<b>City Outcomes Contribution</b>	A City for People - SamKate Douglass, Aaron Tily, Chad Wappes, Tony Cairns, Alexander Savchuk, Megan Salole, Janet Caroline Williams, Jean Sergent-Shadbolt, Ralf Schwate, Tegan van der Peet, Hayley Jones, Alexis Crockett	63.1, 65.1, 235.1, 240.1, 244.1, 246.1, 248.1, 359.1, 699.1, 788.2, 927.1, 960.1,	City Outcomes Contribution	I support the accessibility and Universal Design requirements in the Design Guides and the incentives in the City Outcomes Contribution, I support easier consenting and density bonuses for accessible developments, and I support providing incentives for lifts in multi-story developments.			<b>No change.</b> Support noted. No response needed.
<b>City Outcomes Contribution</b>	Property Council	686.1	City Outcomes Contribution	<ul style="list-style-type: none"> <li>• Introduce incentives for large developments that can demonstrate a City Outcomes Contribution (such as; priority consenting); ...</li> <li>• 9.1 The Draft District Plan proposes a requirement for any large or tall development to demonstrate a 'City Outcomes Contribution' which involves either; providing a public space, using materials that have less environmental impact or providing a public good outcome in other ways. Although we are supportive of this principle, it will likely result in adverse effects.</li> <li>• 9.2 For example, additional requirements for a large-scale development will likely result in a smaller development occurring in its place. As a result, developers will focus on smaller projects to resolve our immediate growth issues, which does not help our long-term or</li> </ul>			<b>No change.</b> Council is happy with current approach.

				future growth needs. (I.e. building six or seven storeys instead of building 10 to 15). We recommend the Council introduce incentives for large developments that can demonstrate a City Outcomes Contribution (such as priority consenting). This would establish a quid pro quo system and enable growth rather than placing additional obstacles for large-scale development to occur.			
<b>City Outcomes Contribution</b>	Darko Petrovic	18.1	City Outcomes Contribution	<p>As a replacement for the current plan I support the new district plan in particular as it will create a more active development environment in Wellington City without unnecessary, restrictive regulation. In order to ensure that a higher densification of the central area will occur, the city council should make it easier for developers to construct buildings that exceed height limits if required. This will provide a higher concentration of dwellings in a single building and with a controlled, modern and environmentally friendly design this would add to the liveability and design appeal of the Central Area.</p> <p>I am aware that the Design Guide (Centres &amp; Mixed Use) allows for this so it would be great to see the council utilising this in future to allow for higher building construction in the central area despite unlimited heights not being adopted.</p> <p>Current earthquake strengthening standards allow for this with the use of ase isolation.</p>			<b>No change.</b> Support noted. No response needed.
<b>City Outcomes Contribution</b>	Inner City Wellington (ICW) – voice of Te Aro and Wellington Central	450.1	City Outcomes Contribution	ICW SUPPORTS the introduction of a City Outcomes Contribution policy where exceptions can be made to height restrictions if the result is a quality living outcome. ICW STRONGLY SUPPORTS the introduction of a points system to ensure that contributions to that quality are made whenever there is an exception. We believe that one of the major obstacles to the creation of diverse inner-city neighbourhoods is affordability...			<b>No change.</b> Support noted. No response needed.
<b>City Outcomes Contribution</b>	Investore		City Outcomes Contribution	<p>7. CITY OUTCOMES CONTRIBUTIONS</p> <p>7.1 Policies MCZ-P11 and LCZ-P11 and related rules require over height, large- scale residential, non-residential and comprehensive development in the Metropolitan Centre zone and Local Centre zone respectively to deliver City Outcomes Contributions as detailed in the Design Guide guideline G107.</p> <p>7.2 Investore is opposed to the City Outcomes Contributions provisions, and specifically is opposed to requiring a City Outcomes Contribution for ‘over height’ development. While Investore recognises the intent of these provisions in providing publicly beneficial outcomes, it is inappropriate for the provision of these publicly beneficial outcomes to be connected to noncompliance with height rules. Developments that breach height standards should instead be considered on their own merits and effects. The provision of beneficial outcomes in any development should be considered as part of the merits of a development, and should not be confined to a specified and required list.</p> <p>7.3The ‘City Outcomes Contributions’ have the potential to act as a disincentive for development, which conflicts with the Draft Plan strategic objectives and NPS-UD requirements of providing development capacity and providing for urban intensification. This would not achieve the aim of “density done well” as stated in the Design Guide.</p> <p>7.4 Furthermore, it is considered that some of the listed City Outcomes Contributions, such as seeking that a portion of the site be vested as public space, is ultra vires the Council’s functions and duties under the Resource Management Act 1991 (RMA).</p>			<p><b>Council is retaining this mechanism.</b></p> <p>Reference to ‘vesting a portion of the site as public space’ has been changed to “accessible as public space” in the design guides.</p> <p><b>Amend CCZ-P12 as follows:</b></p> <p>Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the <a href="#">Centres and Mixed Use Design Guide</a> guideline G107, including through either:</p> <p>1. Positively contributing to public space provision and the amenity of the site and surrounding area by:</p>

				7.5 Accordingly, Investore seeks that all references to the City Outcomes Contributions be removed from the Draft Plan and Design Guides.			<ul style="list-style-type: none"> <li>a. <del>Vesting a portion of the site as public space for the use and enjoyment of the public;</del></li> <li>or</li> <li>b. <del>Providing publicly accessible space such as a laneway or through block connection;</del> or</li> <li>c. <del>Providing a building frontage or set back that helps activate street life and encourage social interaction;</del></li> <li>or</li> <li>d. <del>Providing access to permanent on-site amenities such as public toilets;</del> and/or</li> </ul> <ol style="list-style-type: none"> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li>4. Incorporating a feasible range and quantity of affordable housing options; and/or</li> <li>5. Enabling ease of access for people of all ages and mobility.</li> </ol>
<b>City Outcomes Contribution</b>	Guy Marriage	829	City Outcomes Contribution	<p>A 42.5m high limit that is then possible to extend by increments up to a further 50% higher is beyond ridiculous – 42.5m will enable housing 14 storeys tall, and a further 50% to 63m would then be one of the tallest buildings in Wellington. This is not suitable for the low-rise nature of Te Aro.</p> <p>...</p> <p>I note the remark from London architects on the effort to densify their city:</p> <p>“We are sleep-walking into hyperdense development without proper regard for the long-term consequences. Mid-rise street-based alternatives can meet all London’s housing needs and create popular and sustainable places.” (SuperDensity, 2015).</p> <p>The same comment can be addressed at Wellington’s city planners and urban designers – there is simply no need to permit residential towers anywhere in Te Aro at 42.5m high, let alone 50% higher. They are unnecessary and unwanted, and would not create a friendly comfortable living environment. We are only a small city and what we have achieves its greatness by its small size and general ambience. Permitting /mandating multiple towers would be a mistake that the city would never recover from.</p>			<p><b>No change.</b> Concern noted. However, the 42.5m height limit is being retained. This was signalled in the Spatial Plan and aligns with anticipated growth in this area.</p>



City Outcomes Contribution	Argosy NO1 Property Ltd	881.1	City Outcomes Contribution	<p>delete the City Outcomes Contribution and incorporate design outcomes directly into the Draft Plan;</p> <p>...</p> <p>The City Outcomes Contribution is inappropriate</p> <p>5.2 Policy CCZ-P12 provides for a City Outcomes Contribution, which requires over and under height development, non-residential and comprehensive development to deliver City Outcomes Contributions as detailed in the Centres and Mixed Use Design Guide (Design Guide).</p> <p>5.3 This provision elevates what is normally a design guide into a rule, and provides a mechanism for the Council to require these aspects as part of a development. This is inappropriate. A development should be assessed on its merits. Argosy opposes the City Outcomes Contributions.</p> <p>5.4 Further, a design guide should be separate to a plan. The Design Guide should be an external document to the District Plan and be referenced as a guide only.</p> <p>5.5 Argosy seeks for policy CCZ-P12 to be deleted, and for the design outcomes sought by the Design Guide to be directly provided in the Draft Plan. The Design Guide can be appropriately referenced in the relevant plan provisions in the following way: "For Guidance, refer to the Centres and Mixed-Use Design Guide".</p>				<p><b>Council is retaining this mechanism.</b></p> <p><b>Small change made.</b> Reference to 'vesting a portion of the site as public space' has been changed to "accessible as public space" in the design guides.</p>
City Outcomes Contribution	Wellington City Youth Council	1123.1	City Outcomes Contribution	<p>29. We also believe that the 'City Outcome contribution' for any large or tall development is an important step to ensure every development within the centers are using materials that have less negative impact on the environment and it is providing the best outcomes for the public.</p>				<p><b>No change.</b> Support noted. No response needed.</p>
City Outcomes Contribution	Kainga Ora	1126	City Outcomes Contribution	<p>Kāinga Ora is opposed to the 'City Outcomes Contributions' provisions, and in particular is opposed to requiring 'City Outcomes Contribution' for 'over height' development. While Kāinga Ora supports the intent of these provisions in seeking to provide 'publicly beneficial outcomes', it is inappropriate for the provision of these public goods to be connected to non-compliance with height rules. Any noncompliance with height standards should instead be considered on the basis of its effects, and any positive effects of the development should be considered simply on the merits of the proposal. The 'City Outcomes Contributions' have the potential to act as a disincentive for development, which conflicts with the strategic directions of providing development capacity and urban intensification in the District Plan.</p> <p>...</p> <p>Kāinga Ora opposes requiring 'City Outcomes Contribution' for residential development. This policy has the potential to disincentive residential development. 'Over height' developments should instead be considered on their own merits and effects. Deletion sought.</p>				<p><b>Council is retaining this mechanism.</b></p> <p><b>Small change made.</b> Reference to 'vesting a portion of the site as public space' has been changed to "accessible as public space" in the design guides.</p>
City Outcomes Contribution	Fabric Property Limited - Bianca Tree	1139.5	City Outcomes Contribution	<p>7. CITY OUTCOMES CONTRIBUTIONS</p> <p>7.1 Policy CCZ-P12 and related rules require over height, large-scale residential, non-residential and comprehensive development in the City Centre zone to deliver City Outcomes Contributions as detailed in the Design Guide guideline G107.</p>				<p><b>Council is retaining this mechanism.</b></p> <p>Reference to 'vesting a portion of the site as public space' has been</p>

				<p>7.2 Fabric is opposed to the 'City Outcomes Contributions' provisions, and specifically is opposed to requiring 'City Outcomes Contribution' for 'over height' development. While Fabric recognises the intent of these provisions in providing publicly beneficial outcomes, it is inappropriate for the provision of these publicly beneficial outcomes to be connected to non-compliance with height rules. Developments that breach height standards should instead be considered on their own merits and effects. The provision of beneficial outcomes in any development should be considered as part of the merits of a development, and should not be confined to a specified and required list.</p> <p>7.3 The 'City Outcomes Contributions' have the potential to act as a disincentive for development, which conflicts with the Draft Plan strategic objectives and NPS-UD requirements of providing development capacity and urban intensification. This would not achieve the aim of "density done well" as stated in the Design Guide.</p> <p>7.4 Furthermore, it is considered that some of the listed City Outcomes Contributions, such as seeking that a portion of the site be vested as public space, are ultra vires the Council's functions and duties under the Resource Management Act 1991 (RMA).</p> <p>7.5 Accordingly, Fabric seeks that all references to the City Outcomes Contributions be removed from the Draft Plan and design guides.</p>			<p>changed to "accessible as public space" in the design guides.</p> <p><b>Amend CCZ-P12 as follows:</b></p> <p>Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the <a href="#">Centres and Mixed Use Design Guide</a> guideline G107, including through either:</p> <ol style="list-style-type: none"> <li>1. Positively contributing to public space provision and the amenity of the site and surrounding area by: <ol style="list-style-type: none"> <li>a. <del>Vesting a portion of the site as public space for the use and enjoyment of the public;</del></li> <li>or</li> <li>b. <del>Providing publicly accessible space such as a laneway or through block connection;</del></li> <li>or</li> <li>c. <del>Providing a building frontage or set back that helps activate street life and encourage social interaction;</del></li> <li>or</li> <li>d. <del>Providing access to permanent on-site amenities such as public toilets;</del></li> <li>and/or</li> </ol> </li> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li>4. Incorporating a feasible range and quantity of affordable housing options; and/or</li> <li>5. Enabling ease of access for people of all ages and mobility.</li> </ol>
<b>Appendix 9 – CCZ and WFZ – Minimum</b>	WCC Environmental	571.181	Appendix 9	We agree with these requirements.			<b>No change.</b> Support noted. No response needed.

Sunlight Access and Wind Comfort	Group - Lynn Cadenhead							
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Stadium Zone Extracts – Draft District Plan Consultation

Submission #	Submitter	Submission Point/s#	Submission Summary	Change/s Sought		Proposed Change/s (Note: specific text changes sought are either <u>underlined</u> or <del>struck through</del> )	Response
				Y	N		
1131	Waka Kotahi	1131.26	Support for Policy 2, Policy 3 and Policy 5.				Support noted. No response needed.
668	Transpower NZ Ltd. - Trudi Burney - Senior Environmental Planner	668.45	Supports Rule 9 of the Infrastructure chapter				Support noted. No response needed.

**Waterfront Zone Extracts – Draft District Plan Consultation**

Submission #	Submitter	Submission Point/s#	Submission Summary	Change/s Sought		Proposed Change/s (Note: specific text changes sought are either <u>underlined</u> or <del>struck through</del> )	Response
				Y	N		
1139	Fabric Property Ltd	1139.6	Supports WFZ-S1, but also seeks building height at least equivalent to existing 33 Customhouse Quay, or a permitted height of 20m for Meridian Building.	Y			<b>Change made.</b> Support noted. Building height of 33 Customhouse Quay (Meridian Building) adjusted to 17.7 m above ground level, to reflect updated survey of current building height.
1116	Heritage New Zealand Pouhere Taonga	1116.19	Supports WFZ-07, P5, P6, M1, all Rules		N		<b>No change made.</b> Support noted. No response needed.
938	Queens Wharf Holdings Ltd.	938.1	Notes that “Queens Wharf Buildings” are not identified on Planning Maps. Support for the specific Queens Wharf rules. Notes a few reference errors within the rules. Notes that any change in building height measurement must not reduce the real-world maximum height of Queens Wharf buildings, and that the maximum height applies both Queens Wharf Buildings.	Y			Identify Queens Wharf buildings as a specific control on the Planning Maps.
875	Wellington Civic Trust	875.1	Support Lambton Harbour Area being included as part of a Special Purpose Waterfront Zone.  Inconsistencies within text and mapping to be addressed.  general support for WFZ-03 (see submission point)  General support for WFZ-05- although objective seems to conflict with having public transport in the zone itself.	Y			<b>No change</b> at this point, as it is a summary of the later submission points. Support noted.
		875.2	Introduction needs to incorporate the principles of the Framework more clearly.  Intro section needs to mention natural hazards and in the cross references section.	Y			<b>Changes made:</b>  Added that the Waterfront Zone is predominantly a public area, noting this is a principle from the Wellington Waterfront Framework.  Deleted “generally” from “Applications for significant new development in the Waterfront Zone are generally publicly notified.” Reflects the Framework’s principle of notification. In line with this, applications for additions and alterations that do not

							<p>comply with controlled or restricted discretionary activity standards, and discretionary and non-complying new buildings in public open space, are publicly notified.</p> <p>Added cross-reference to the coastal natural hazard overlay provisions in the District Plan.</p>
		875.4	<p>Support O3 although objective should refer to the defined term of Recreational Activity so that it clearly incorporates passive recreation.</p> <p>Should acknowledge role of these areas in times of civic emergency</p>	Y			<p><b>Changes made:</b></p> <p>Support noted. Changed the term from “recreation” to “recreation activity”.</p> <p>Emergency service facilities and activities are already provided for in the zone, so no changes made to acknowledge the area in times of civic emergency.</p>
		875.5	<p>WFZ-P1 should remove public transport and visitor accommodation as enabled activities. This should be a managed activity under WFZ-P2.</p> <p>Visitor Accommodation should not be able to occupy new buildings and ground floors of any buildings in the zone. Provisions should be worded similarly to Residential activities- ie above ground only and only to occupy existing buildings.</p> <p>Industrial activities should not be permitted in Waterfront Zone land. Item 1 in WFZ-P2 should be shifted to WFZ-P3 (incompatible activities).</p> <p>Suggestions to add to WFZ-P4 to highlight public open space role and clarify 'harbours edge'</p> <p>WFZ-P6 clarify meaning of 'reflect their visual prominence'.</p> <p>WFZ-P7- map changes sought (see separate point) and words 'individually' be added before 'cumulatively'</p>	Y			<p>Disagree that visitor accommodation is inappropriate in new buildings and ground floors, as it can be part of overall vibrancy and public use of the Zone and enhances the Zone's purpose.</p> <p>Public transport needs to be provided for as an MRT station may be located within the zone, around the Post Office Square.</p> <p>Industrial activities are not permitted outright, but require resource consent to manage their location, scale, and adverse effects on the Zone. This is appropriate given the mixed-use and historic light industrial activities (e.g. warehousing, repairs) in the Zone.</p> <p><b>Some changes made:</b></p> <p>Replaced in P4 “harbour’s edge” with “edge of the coastal marine area and structures within it”.</p> <p>Clarified in P6 building forms and facades to be of a high quality “especially those that are visually prominent.”</p>
		875.6	<p>Concerned that mapping of Public Open Space areas has left out some such as: the space between buildings opposite the end of Brandon St, the area south of Shed 21, the area between the boatshed and the sea, the area between the Circa building and Te Papa, and the area between Te Papa and the proposed area of change to the east.</p> <p>Lambton Harbour Area is inherently a public open space network with buildings within it. Concerned that the rules will allow the areas not shown as Public Open Space to be gradually filled up with buildings and structures. Seek that the plan includes a clarification</p>	Y			<p><b>Change made.</b> Mapped areas of public open space have been modified and expanded in some locations to address this point.</p> <p>Public open space is not mapped into Te Papa's property as this is managed effectively as part of national management plans. Service lanes are excluded as are needed for vehicle movements primarily.</p> <p>The zone still has an overall standard of site coverage of less than 35%, so this will limit new building expansion.</p>

			of the purpose of these areas and how they are intended to be managed in the future in the zone introduction or policy.				
		875.9	<p>Public transport activities should be permitted unless just for transit stops on city edge of zone only. Concern that definition of Public Transport is so broad there would be no ability to consider the impact of potentially major facilities.</p> <p>Oppose visitor accomodation within waterfront- delete WFZ-R7 and include in WFZ-R8 above ground and in existing buildings only. Full discretionary otherwise.</p> <p>Industrial activities should be non-complying (delete WFZ-R9)</p> <p>Buildings- WFZ-R12 do not permit alterations to buildings within the public open space. Unclear how to apply the 200m2 restriction.</p> <p>Port equipment (beyond what is already there) should not be permitted- make controlled or restricted discretionary</p> <p>Oppose restricted discretionary activity status of alterations and additions (item 5). Particularly in its northern area, many very large buildings have been able to be built on this public land. Any building extension should be discretionary and notified</p> <p>Oppose the rule providing for new small buildings in public open space as permitted activities in WFZ-R13. The public open space is limited and particularly valued. Any small building should be at least restricted discretionary, with discretion focussed on impacts on the usability and availability of open space, shading and impacts on pedestrian and micro-mobility movement and flow. We have particular concerns about the interpretation of the aggregate area rule, particularly give that many of the public open spaces are very small already.</p>	Y			<p><b>No changes made.</b> Disagree that visitor accommodation is inappropriate in new buildings and ground floors, as it can be part of overall vibrancy and public use of the Zone and enhances the Zone's purpose.</p> <p>Public transport needs to be provided for as an MRT station may be located within the zone, around the Post Office Square.</p> <p>Industrial activities are not permitted outright, but require resource consent to manage their location, scale, and adverse effects on the Zone. This is appropriate given the mixed-use and historic light industrial activities (e.g. warehousing, repairs) in the Zone.</p> <p>The 200 m2 restriction sets a bottom line for overall density of buildings in public open spaces, to avoid adverse cumulative effects in these areas.</p> <p>Disagree that port equipment should need resource consent – port equipment is part of the character of the Zone and often has a functional need to be in specific locations.</p> <p>Additions are limited now to only 5% of the floor area present at time of the Proposed District Plan notification, to avoid cumulative additions over time without it being discretionary and notified.</p> <p>The permitted activity status for small buildings in public open space is appropriate as they can enhance the use of the space, still require WCC approval as landowner/manager of the land, and have limits on their cumulative expansion. If it's a small public space, the maximum collective building area permitted is correspondingly smaller.</p>

## Appendix 3: CCZ and WFZ Qualifying Matter Analysis

### 12.1 Historic Heritage Qualifying Matter application to the whole of the WFZ

The whole Waterfront Zone has a historic heritage qualifying matter that modifies the NPS-UD direction to enable 6+ storeys that would otherwise apply in the Zone.



Figure 2: The Waterfront Zone in the PDP covers the area of land shown in grey between the two thicker black lines.

NPS-UD Policy 3 gives specific directions on building densities and heights in tier 1 urban environments, including Wellington City. Under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (RM Enabling Act), the Council must give effect to Policy 3 using an intensification streamlined planning process. This will be done as part of the PDP, to be notified in mid-2022.

NPS-UD Policy 3(c) states that the district plan must enable building heights of at least 6 storeys within at least a walkable catchment of existing and planned rapid transit stops, and the edge of the city centre zone and metropolitan centre zones. This policy applies to all of the Waterfront Zone, as described below. The other parts of Policy 3 (a, b and d) do not apply to the Waterfront Zone.

The purple colour on the picture above indicates the City Centre Zone. All points of the Waterfront Zone are less than 300 m walking distance from the City Centre Zone, so Policy 3(c)(ii) applies to the Waterfront Zone.

The yellow shading on the picture below indicates the 10-minute walkable catchment from the Wellington Station rapid transit stop (purple star), which includes the northern part of the Waterfront Zone outlined in black. Policy 3(c)(i) applies to this part of the Waterfront Zone. Note this walkable catchment shown in yellow does not have a regulatory function in the PDP so is not precisely calibrated.



*Figure 3: Showing the 10-minute walking catchment from the Wellington Station rapid transit stop.*

The metropolitan centre zone walkable catchment mentioned in Policy 3(c) does not apply to the Waterfront Zone.

This NPS-UD requirement to enable 6+ storeys can be modified to accommodate “qualifying matters”. The qualifying matters in NPS-UD subpart 6 3.32 that apply to the Waterfront Zone are:

- the protection of historic heritage from inappropriate subdivision, use, and development
- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
- open space provided for public use, but only in relation to the land that is open space
- any other matter that makes high density development as directed by Policy 3 inappropriate in an area, but only if the requirements of clause 3.33(3) are met.



## Existing protected historic heritage



Figure 4: The historic heritage items and areas (excluding areas of significance to Māori discussed below) protected by the PDP are outlined in red. The equivalent items and areas protected in the Proposed Regional Natural Resources Plan are also outlined in red for context. Note these outlines are not precisely calibrated so should be used for identification not regulatory purposes.

All the PDP notified historic heritage items and areas in the Waterfront Zone are also protected in the operative district plan, so the 'alternative process for existing qualifying matters' in section 77MA of the RM Enabling Act will be used for this assessment.

### *The alternative height standards proposed*

The heights of the existing heritage buildings are also the maximum heights for any redevelopment of the sites. The part of the Post Office Square Heritage Area within the Waterfront Zone does not enable 6+ storeys, but defers to the height controls in the Zone itself. The Zone does not specify a maximum height, except for Queens Wharf buildings at 18.5 m above sea level. Instead, buildings require a discretionary resource consent to demonstrate they are low-rise buildings of a scale appropriate to existing nearby buildings, particularly heritage buildings.

### *Why the items and areas are subject to this qualifying matter*

The protection of historic heritage from inappropriate subdivision, use, and development is a qualifying matter under NPS-UD section 3.32(1)(a). The historic heritage items and areas shown in the picture above are protected in the operative district plan and PDP. Enabling 6+ storeys to be built on these locations would significantly degrade the historic heritage values described in the PDP Schedules 1, 2 and 3.

### *The level of development prevented (in general terms)*

If a heritage building were removed, and notwithstanding the other qualifying matter controls, the PDP would enable buildings 6+ storeys high. Buildings 6-18 storeys are commercially viable to construct given the very high land values here (around \$6,000/m<sup>2</sup>), even accounting for appropriate foundations to minimise natural hazard risk from ground shaking, coastal inundation and tsunami. The 18 storey buildings on the other side of Customhouse and Jervois Quays illustrate the level of development being prevented by this qualifying matter.

*Other Waterfront Zone historic heritage values in the existing Lambton Harbour area*

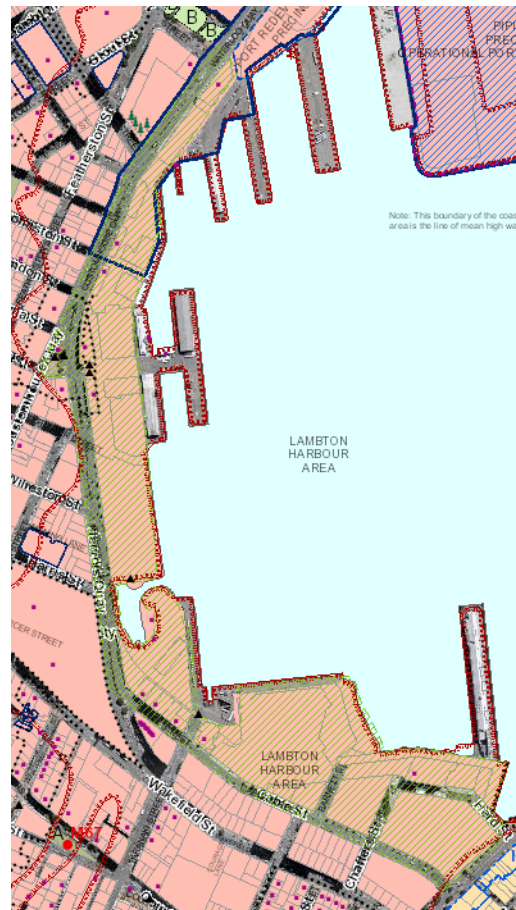


Figure 5: Lambton Harbour Area in the Operative Wellington City District Plan



Figure 6: Heritage New Zealand nomination of Wellington Harbour Board Historic Area

As historic heritage values are operative matters in the Operative District Plan, the 'alternative process for existing qualifying matters' in section 77MA of the RM Enabling Act will be used for this assessment.

*Why the area is subject to this qualifying matter*

The Operative District Plan requires that all new buildings in the Lambton Harbour Area [now the Waterfront Zone] to have a discretionary resource consent, with policies to:

- 12.2.8.4 Maintain and enhance the heritage values associated with the waterfront.
- 12.2.8.5 Recognise and provide for developments and activities that reinforce the importance of the waterfront's Māori history and cultural heritage.
- 12.2.8.7 Maintain and enhance the Lambton Harbour Area [the Waterfront Zone in the PDP] as an integral part of the working port of Wellington.

Height limits are either the heights of existing buildings, or zero metres above mean sea level. The "zero metre limit" was a method to remove any enabling assumptions about height. Resource consent applications must demonstrate that new buildings are low-rise of a scale appropriate to existing nearby buildings, particularly heritage buildings. Queens Wharf buildings have a specified maximum height 18.5 m above mean sea level which is equivalent to historic warehousing on the site.

The [Wellington Waterfront Framework](#) identifies the Waterfront as an area of high public and harbour uses that are based on its Māori history and industrial maritime heritage. The Framework has principles and policy for development to express the heritage and history of the area. While the Courts determined the Framework does not have legal standing in the Operative Plan, it is still an important management document that the Council, and the Courts, have regard to when applying the Operative District Plan.



The waterfront area in central Wellington.  
 Figure 7: Exert from the Wellington Waterfront Framework.

Heritage New Zealand nominated the historic Wellington Harbour Board area as a Historic Area, though this has not been confirmed. Council can have regard to the *Registration Report for a Historic Area – Wellington Harbour Board Historic Area (2012)* when assessing the area’s historic heritage values.

These existing statutory and non-statutory information and directions mean it is not just the remaining heritage buildings in the Waterfront Zone that are important for historic heritage, but also that new buildings must maintain and enhance the history of the Lambton Harbour Area/Waterfront Zone.



Figure 8: Photos from the Wellington Waterfront in (clockwise from top left) 1899, 1865 and 1913. First three images are from the Alexander Turnbull Library ID: 1/2-065775-F; 1/2-048782-G; 1/2-110849-F. Permission of the Alexander Turnbull Library, Wellington, New Zealand, must be obtained before any re-use of these images. Fourth image is from the Wellington Waterfront Framework page 8.

Historically, harbour buildings were smaller than buildings on the other side of the Quays (now the City Centre), typically 2 – 4 storeys as illustrated in the photos above.

Enabling 6+ storey buildings in this area would overshadow the prominence of the remaining heritage buildings in this area. Tall buildings would also bring the City Centre towards the waterfront, changing the historic nature of the area.

Environment Court decision NZEnvC 74 upheld the application of this qualifying matter. For example:

- [43] “Notably, all three experts agreed that a place or object does not need to be listed or registered to be of heritage value.”
- [47] “In summary then, we conclude that in order to be consistent with the NZCPS the variation should protect historic heritage in the coastal environment

from inappropriate subdivision, use and development ... while some of these [heritage] features fall outside of the development area, they nevertheless influence, and will be influenced by, what will take place within the development area. In NZCPS terms they set part of the context for use and development in this area.”

- [49] “While, overall, Variation 11 may not be *contrary* to the NZCPS it nevertheless does not meet that document’s expectations of identifying and protecting historic heritage from inappropriate development.”
- [124] “We find that the balance of building to open space and visual connections characteristic of the heritage values will be better served by the deletion of Block C and its nomination as open space.”
- [135] “While the Variation removes an *ultra vires* reference to the Waterfront Framework as a district plan method it does not encapsulate key features of this Framework which reflect established public policy for the development of the waterfront. The basis for the Variation was in part to carry this policy through into the district plan and that has not occurred particularly in relation to building development appropriate to the protection of historic heritage.”
- [139] “The Variation as drafted sets in place rules which will not necessarily protect historic heritage from inappropriate development. There is the potential for new development to overwhelm existing registered historic buildings.”

#### *The alternative height standards proposed*

In the PDP, to retain the heritage values of the historic Harbour Board area and the Waterfront Zone generally, new and altered buildings are discretionary, or non-complying if buildings on public open space exceed 200 m<sup>2</sup>. Applications for new/altered buildings must demonstrate they are at a bulk, scale and height complementary to and of a scale appropriate to adjacent buildings, and of a design that responds positively to adjacent heritage buildings.

The Queens Wharf buildings have a maximum height control of 18.5 m above sea level. This retains building height at a level that reflects historic warehousing on the site.

#### *The level of development prevented (in general terms)*

Without discretionary controls on height to retain the heritage values of the Waterfront Zone, and notwithstanding the other qualifying matter controls, the PDP would enable buildings 6+ storeys high. Buildings 6-18 storeys are commercially viable to construct given the very high land values here (around \$6,000/m<sup>2</sup>), even accounting for appropriate foundations to minimise natural hazard risk from ground shaking, coastal inundation and tsunamis. The 18 storey buildings on the other side of Customhouse and Jervois Quays illustrate the level of development being prevented by this qualifying matter.

## **12.2 The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.**

### *Why the area is subject to this qualifying matter*

Treaty of Waitangi settlements for Taranaki Whānui ki Te Upoko o Te Ika and for Ngāti Toa Rangatira identify the iwi’s special association with Te Whanganui ā Tara (Wellington Harbour) in statutory acknowledgments.

The PDP identifies Te Raukura-Te Wharewaka o Poneke as a site of significance to Māori. Also important are the Waimapihi, Waitangi, Waikoukou and Kumutoto Streams which historically drained to the Waterfront.



Figure 9: Te Aro Pā sites of significant mana whenua value. Solid orange site is in the Proposed Regional Natural Resources Plan (in January 2022 was beyond challenge, treated as operative). The dotted orange and white box, and solid orange outline box (Te Wharewaka) are notified in the Proposed District Plan.

From consultation with mana whenua, the PDP identifies that the Waterfront Zone has particular importance to mana whenua, particularly the land area (dotted orange and white box above) and coastal area (solid orange box above) of significant mana whenua value relating to Te Aro Pā, and Te Wharewaka o Pōneke in between them.

Mana whenua have also identified the landward areas of the Te Aro pā coastal area within the Waterfront Zone as an area where mana whenua should have particular involvement in management and development of the waterfront, given their strong relationship, culture and traditions with this area.

*Why this qualifying matter is incompatible with the level of development directed by NPS-UD Policy 3(c)*

Buildings 6+ storeys high are not necessarily always incompatible with Māori relationships and culture in this area. However, some development at this height may be incompatible, depending on its design, shading, and function. Mana whenua want to have full scope to co-manage this area of significance, which means that all significant developments should be full discretionary, with no “enabling” of 6+ storeys height.

This is consistent with Policy 2 of the New Zealand Coastal Policy Statement: “provide opportunities in appropriate circumstances for Māori involvement in decision making”, and “provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment”.

*The costs and impact of limiting building height in this area (overview only)*

There is limited development potential in the Waterfront Zone adjoining the Te Aro Pā coastal site of significance, as most sites are protected heritage buildings and protected public open spaces. The other qualifying matters also limit the scope for buildings to be 6+ storeys high.

The benefits of enabling 6+ buildings in these areas of significance to Māori is less than the benefits of retaining the flexibility for mana whenua to co-manage this area with lower heights as appropriate.

### 12.3 Open space provided for public use, but only in relation to the land that is open space



Figure 10: Public open space protected in the Waterfront Zone are the green boxes.

The Operative District Plan and the PDP specify that at least 65% of the Waterfront Zone must be free from buildings (i.e. maximum 35% site coverage across the whole Zone). As well as this, the PDP has specific controls protecting areas of open space provided for public use – areas shown in the pictures above.

#### *Why these areas are subject to this qualifying matter*

The areas in green above are “open space provided for public use”, and the qualifying matter applies “only in relation to the land that is open space” (refer section 3.32 NPS-UD). Within these areas, the PDP generally limits buildings to those less than 4 m high and less than 30 m<sup>2</sup>, and the areas are developed and maintained as pedestrian-friendly open spaces for the public to enjoy.

#### *Why this qualifying matter is incompatible with the level of development directed by NPS-UD Policy 3(c)*

WFZ-P7 of the PDP states “Protect the Waterfront Zone’s public open spaces by avoiding new permanent buildings above-ground on public open space except where they improve the space for public use and enjoyment and do not dominate or cumulatively diminish the

public open space.” Enabling 6+ storey buildings in these areas is incompatible with this policy direction as they would dominate and diminish the open space for public to enjoy.

#### *The costs and impact of limiting building height in this area*

Without restrictions on building height, design and density in public open space in the Waterfront Zone, and notwithstanding the other qualifying matter controls, buildings 6+ storeys high. Buildings 6-18 storeys are commercially viable to construct given the very high land values here (around \$6,000/m<sup>2</sup>), even accounting for appropriate foundations to minimise natural hazard risk from ground shaking, coastal inundation and tsunamis. In practice, the Council’s Parks Sport and Recreation team currently manages these public open spaces for public recreation and events. This purpose tends to discourage proposals for tall buildings in these spaces.

The public open spaces provide views, sunlight, and access to recreation, parks and urban amenity for people living and working in the City Centre and Waterfront Zones. Enabling 6+ storey buildings on these open spaces would considerably decrease these values, and may correspondingly decrease property values in the City Centre.

The loss of public space and amenity would also significantly adversely affect the benefits of the Waterfront Zone to Wellington’s identity and sense of place, recreational and cultural opportunities, and the urban amenity of parkland to offset the density of the City Centre.

#### **12.4 Any other matter that makes high density development as directed by Policy 3 inappropriate in an area, but only if the requirements of clause 3.33(3) are met.**

Two other qualifying matters affecting building height apply in the WFZ and the CCZ: sunlight to public spaces and viewshafts.

##### **12.4.1 Minimum Sunlight Access – public spaces – CCZ and WFZ:**

The CCZ and WFZ have a minimum sunlight access to public spaces standard (CCZ-S6 and WFZ-S2) which is a carryover of an ODP provision. This provision has been in the ODP since it was first made operative in 2001.

The intent of the standard and thus qualifying matter under the NPS-UD, is to require buildings and structures to be designed and located in manner which maintains direct sunlight access to Central Area (CCZ and WFZ under the PDP) parks. The control itself is associated and thus mapped with the specific public space. But it applies to the adjacent development.

This controls requires that new buildings and additions or alterations to existing buildings are designed to ensure sunlight is protected for certain periods of the day. Larger parks are protected for longer periods (typically from 10am-3pm or 4pm) and the smaller parks are protected for shorter time periods (typically 12-2pm).

This control was brought in post introduction of the RMA 1991 when the District Plan first became operative as part of period when Council had chosen to dispense with plot ratio systems for managing development intensity, and instead developed plan provision to manage the effects of new buildings through a combination of design assessment and environmental standards i.e. sunlight to parks<sup>13</sup>. The control was brought in to ensure new

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<sup>13</sup> District Plan Change 48: Central Area Review – Section 32 Report (Part C), 2006, WCC



buildings did not adversely impact the public environment. Figure 11 below identifies the PDP's extent of the sunlight access specific control.



Figure 11: Minimum sunlight access requirements control applying to the WFZ and CCZ public spaces as shown in yellow hatching.

Table one below identifies the current spaces being protected, the additional spaces added as part of the Draft District Plan, additional spaces added as part of the Proposed District Plan and time periods where sunlight access should be maintained.

Table 1: Table comparing minimum sunlight controls under the ODP vs PDP.

<b>Public spaces:</b>	<b>Time period protected under the ODP:</b>	<b>Time period protected under the Proposed District Plan:</b>
Cuba Mall	12:00 noon to 2:00pm	11.30am to 1.30pm
Manners Mall	1:30pm to 3:00pm	1.30pm to 3.00pm
Midland Park	12 noon to 2:00pm	12.00pm to 2.00pm
Civic Square	12 noon to 2:00pm	10.00am to 4.00pm
Denton Park	12:30pm to 2:00pm	12.00pm to 2.00pm
Glover Park	12 noon to 2:00pm	12.00pm to 2.00pm
Cobblestone Park	12 noon to 2:00pm	12.00pm to 2.00pm
Te Aro Park	12 noon to 2:00pm	12.00pm to 2.00pm
'Clock Park' Southeast corner Courtenay Place/ Taranaki Street intersection	12 noon to 2:00pm	12.00pm to 2.00pm

Kumutoto Park	12 noon to 2:00pm	12.00pm to 2.00pm
Post Office Square	12 noon to 1:30pm	12.00pm to 2.00pm
Frank Kitts Park	10:00am to 4:00pm	10.00am to 4.00pm
Taranaki St Wharf/Lagoon Area	12 noon to 2:00pm	12.00pm to 2.00pm
<b>New spaces added through the DDP and PDP</b>		
Katherine Mansfield Memorial Park	N/A	10.00am to 4.00pm
Hungarian Garden (Called "Magyar Millennium Park")	N/A	12.00pm to 2.00pm
NZ Parliament Grounds – Green space within Parliament Precinct facing Molesworth Street	N/A	10.00am to 4.00pm
Waititi Landing (ANZAC Corner)	N/A	10.00am to 4.00pm
The Cenotaph – War Memorial Park	N/A	10.00am to 4.00pm
Railway Station Forecourt	N/A	10.00am to 4.00pm
Flagstaff Hill/Terrace Gardens	N/A	12.00pm to 2.00pm
Volunteer Corner	N/A	11.30am to 1.30pm
Te Niho Park	N/A	12.00pm to 2.00pm
Frederick Street Site	N/A	12.00pm to 2.00pm
Pukeahu National War Memorial Park	N/A	10.00am to 4.00pm
Basin Reserve	N/A	10.00am to 4.00pm
Te Papa East green space	N/A	10.00am to 3.00pm
Waitangi Park	N/A	10.00am to 4.00pm
Clyde Quay Park	N/A	12.00pm to 2.00pm

The PDP has included more public spaces for protection than currently provided for in the ODP. The ODP has 13 public spaces, which has been increased to 28 in the PDP. Council officers worked with urban design and green network plan officers to identify the new parks for inclusion in the PDP. This is a reflection of new spaces being created but also the need to protect sunlight to public spaces as the CCZ and WFZ intensifies, as well as to give effect to the well-functioning environment directive of the NPS-UD and the Green Network Plan vision.

The introduction of the new minimum 70% sunlight method as part of the PDP CCZ and WFZ sunlight control enables more development capacity than the current approach and more flexibility for developers in their designs.

Both the ODP parks and the new PDP parks were analysed for sun shadow volume to understand the current level of shading on the public spaces from existing development.

Modelling of shading impacts by existing buildings affirmed this approach. Council GIS officers worked on the 2017 3D building dataset of Wellington to analyse the sun shadow volume. The latest 3D building layer Council has access to is the 2017 dataset. Based on this layer and 3D analysis toolbox, Council was able to model and identify the shadow cast by each building using sunlight for a given date and time ( for example, 21 March between 12 and 2 pm). See figures 12 and 13 below showing 3D modelling of shading impacts upon identified parks.

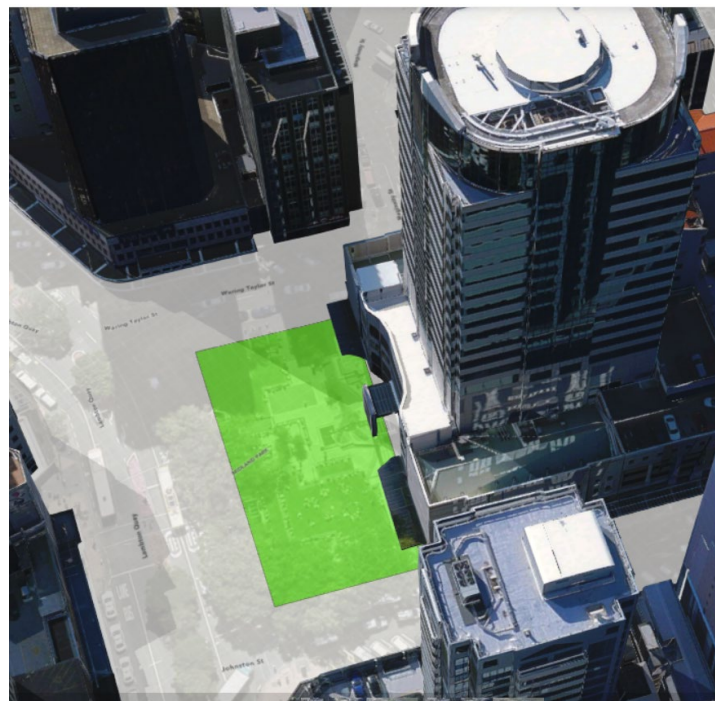


Figure 12: Showing shadow analysis for Midland Park undertaken as part of the DP review.

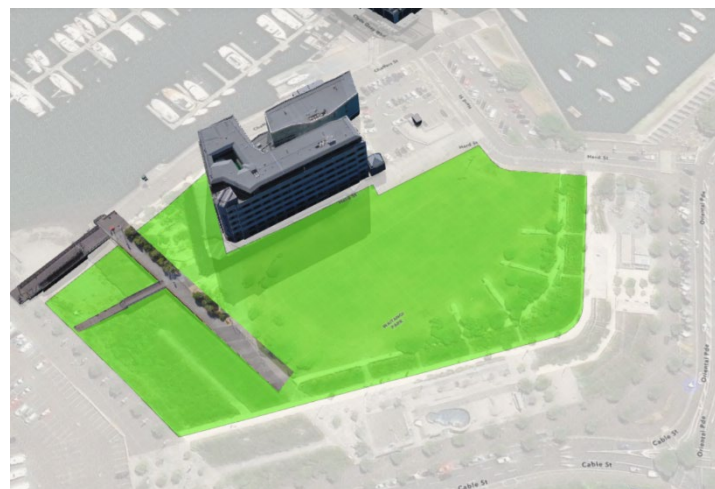


Figure 13: Showing shadow analysis for Waitangi Park undertaken as part of the DP review.

Council then analysed the overlap between the shadow volume layer and public spaces to identify which part of each public space does not have access to sunlight at a specific time of a day and which building blocks the sunlight. Council officers then used this information to assess whether changes to sunlight protection hours needed to be adjusted given current shading impacts and sunlight access during the ODP hours. Some adjustments were made to the following public spaces as identified in Table one:

- Post Office Square
- Civic Square
- Cuba Mall
- Denton Park.

The following commentary is required by section 77K and 77Q:

(a) identify by location (for example, by mapping) where an existing qualifying matter applies:

- The Sunlight access control is contained to sites within the CCZ and WFZ as per Figure 11 above. All of the public spaces to which these controls apply to adjacent sites have been modelled and included in the Proposed District Plan maps.
- The Council's GIS and District Plan team attempted to understand if they could identify specific sites surrounding these public spaces that would be directly impacted by the control should they be developed, rather than the public spaces themselves. However, this required extensive time and resourcing to achieve this, which unfortunately the Council could not undertake due to timeframes required to notify the PDP. Melbourne is an example of a City having completed this work.
- This is something Council is considering in the future. It would require a fan type identification of all sites that building up to the maximum height limit could potentially impact adjacent parks. This would need to be calculated to identify the end point. Another complication is that height limits can be exceeded through the City Outcomes Contribution mechanism.
- As such, the PDP applies the control to all sites in the PDP. Should developers wish to develop their site they will need to undertake shading analysis as part of their resource consent application to show their compliance with these standards.

(b) specify the alternative density standards proposed for those areas identified under paragraph (a):

- Explicit alternative height and density standards are not specified in the PDP to manage impacts upon sunlight access to identified public spaces (in Appendix 9).
- Alternatively, developments have to be designed to ensure they do not create a bulk and form that would shade these public spaces during these time periods.

(c) *identify in the report prepared under [section 32](#) why the territorial authority considers that 1 or more existing qualifying matters apply to those areas identified under paragraph (a):*

- Because this sunlight protection control is contained in the ODP.
- Further to this the council is undertaking an assessment (detailed below) to quantify the costs and impacts, both on development capacity and more broadly of including sunlight protection controls to public spaces to satisfy the requirements of the RMA.

(d) describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3:

- This will be quantified by the report detailed below as a site specific analysis is required.

**NOTE: At date of publication the Council is awaiting a detailed assessment that meets and goes beyond the requirements of 77K and 77Q of the RMA to demonstrate the net effect of each qualifying matter on the provision of development capacity, including those new scheduled items that are not currently scheduled in the operative district plan.**

**This report will be published approximately August 2022 and made publicly available to support this section 32 report.**

#### 12.4.2 Viewshafts:

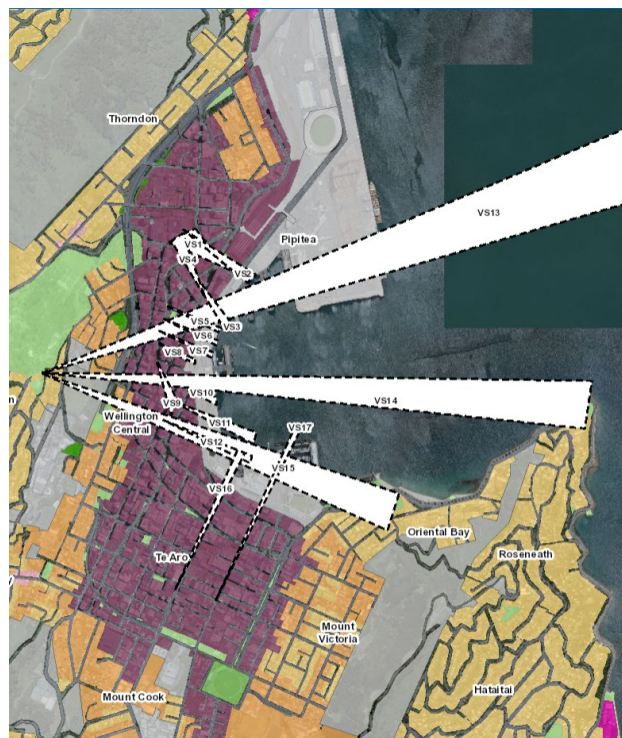


Figure 14: Viewshafts covering the CCZ and WFZ.

The viewshafts that affect the height of buildings in the WFZ are the smaller grey shafts intersecting with the Waterfront Zone in the picture above. The three large viewshafts expanding from left to right start from 122.2 m above sea level and extend to Somes Island, Point Jerningham and Oriental Parade so do not have a significant effect on building heights beyond the other qualifying matters discussed above.

Viewshafts do not impinge upon height of buildings in the CCZ. Viewshafts either site above the maximum height limit levels in the CCZ or run along road corridors. As part of the District Plan review the existing viewshafts included in the Operative District Plan were reviewed with amendments made and the list of final viewshafts for incorporation into the Proposed District Plan made. These were modelled in a 3D viewer as part of qualifying matter analysis for the City Centre Zone.

As part of the District Plan review, no new viewshaft was added. All viewshafts are views carried over from the Operative District Plan. The clause 3.33(3) tests for qualifying matters for viewshafts are discussed in the Viewshaft Section 32 report.

***NOTE: At date of publication the Council is awaiting a detailed assessment that meets and goes beyond the requirements of 77K and 77Q of the RMA to demonstrate the net effect of each qualifying matter on the provision of development capacity, including those new scheduled items that are not currently scheduled in the operative district plan.***

***This report will be published approximately August 2022 and made publicly available to support this section 32 report.***