



***Proposed District  
Plan Change 47***

**Takapu Island Rezoning**

28 October 2006

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## The Application

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To: Wellington City Council

Applicants: Takapu Island Developments Ltd

The Site: The site is known as Takapu Island, Takapu Rd, Tawa.

Legal Description: Section 1 SO 23462

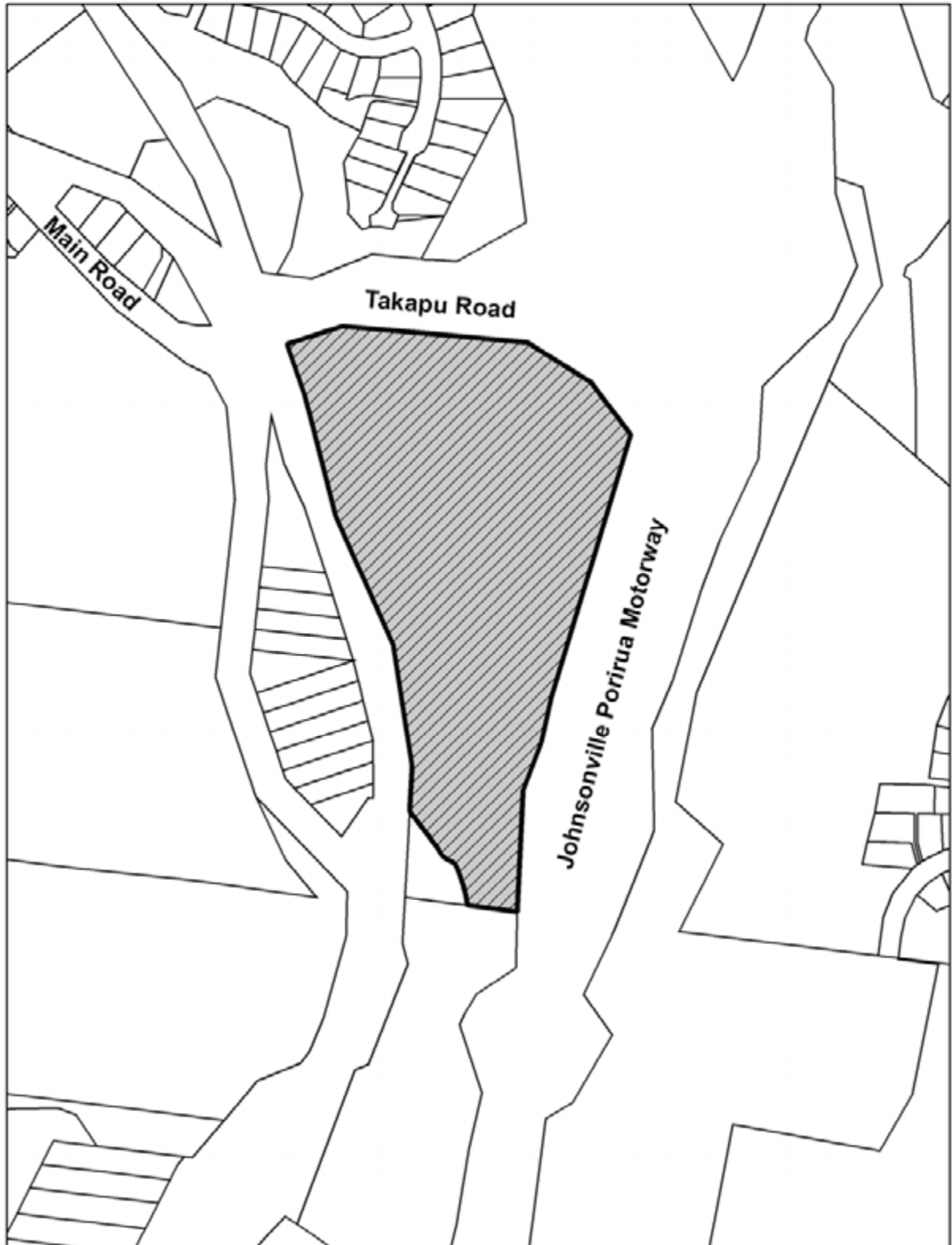
The Application: To rezone the site from Outer Residential to Suburban Centre by amending District Plan Map 30 so that the subject site is within the suburban centre area.

In addition to the rezoning of the site to Suburban Centre, it is proposed that the site be subject to specific provisions relating the design and appearance of buildings and landscaping.

The application is a Plan Change Request in accordance with section 73(2) of the Resource Management Act

Applicant's Address for Service: Spencer Holmes Ltd  
P.O. Box 588  
Wellington  
Attn: Ian Leary

Proposed District Plan Change 47 - Takapu Island Rezoning



 Land currently zoned Outer Residential to be zoned Suburban Centre

0 2.85 50 75 100  
Meters



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## Additions and alterations to Suburban Centre rules

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- 7.1.2 The construction, alteration of, and addition to buildings and structures except for:
- For Pt Lot 2 DP 54434, Grenada refer to Appendix 7*
- those specified as Controlled Activities, Discretionary Activities (Restricted) or Discretionary Activities (Unrestricted)
- are Permitted Activities provided that they comply with the following conditions:.....
- For Section 1 SO 23462 (Takapu Island) refer to Appendix 8*
- 7.3.2 The construction, alteration of, and addition to buildings and structures which do not meet one or more of the following conditions for Permitted Activities in rule 7.1.2:
- For Pt Lot 2 DP 54434, Grenada, refer to Appendix 7
- 7.3.2.1 maximum building height
- 7.3.2.2 height control adjoining Residential Areas
- 7.3.2.3 coastal yards
- 7.3.2.4 verandahs
- 7.3.2.5 display windows
- or, where the building or structure would be a controlled activity under rule 7.2.1 or 7.2.2 but the standards and terms are not met
- are Discretionary (Restricted) Activities in respect of:
- the condition(s) that are not met; and
  - if consent is required because of failure to meet the standards and terms in rule 7.2.1 or 7.2.2; design, external appearance and siting.

**Appendix 8. Particular provisions for that part of the area situated in Tawa, immediately to the south of Takapu Road and west of the motorway mapped suburban centre (being Section 1 SO 23462 on the 1st May 2006)**

**The Suburban Centre Rules shall apply with the following exceptions:**

Rule 7.1.2 - Buildings being permitted activities

Rule 7.3.2 - Buildings being discretionary (restricted) activities

Rule 7.3.5 - Three or more household units at ground level being discretionary (restricted)

**The following additional rules shall apply:**

**1.1 The construction, alteration of, and addition to buildings and structures (excluding all signs, and fences two metres or less in height), or retailing activity that exceed 1000m<sup>2</sup> in floor area per site, is a Discretionary Activity (Restricted) in respect of:**

**1.1.1 building location**

**1.1.2 building materials and design elements**

**1.1.3 Landscaping**

**1.1.4 Earthworks**

**1.1.5 Retailing**

**Assessment Criteria**

**In determining whether to grant consent and what conditions, if any, to impose, Council will have regard to the following criteria:**

**1.1.5 The extent to which any adverse visual effects of buildings or structures on the surrounding environment can be mitigated by building materials and design elements, building location and landscaping.**

**1.1.6 The extent to which the density and height of landscaping between the proposed building and the motorway will mitigate any adverse visual effects of the proposed building(s) when viewed from the motorway and adjoining sites.**

**1.1.7 The extent to which earthworks are treated and landscaped to reduce potential visual effects.**

**1.1.8 The extent to which the effects of the proposed retailing activity is consistent with Council's relevant retail strategies**

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## **Appendix 1**

- A.** Additional information provided to support the application for Proposed District Plan Change 47
- B.** Section 32 Analysis

*\*for further information in support of the proposed plan change, please contact Ian Leary at:*

Spencer Holmes Ltd  
P.O. Box 588  
Wellington

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## 2. Site Description

### 2.1 Legal Description

Section 1 SO 23462

### 2.2 Current Zoning

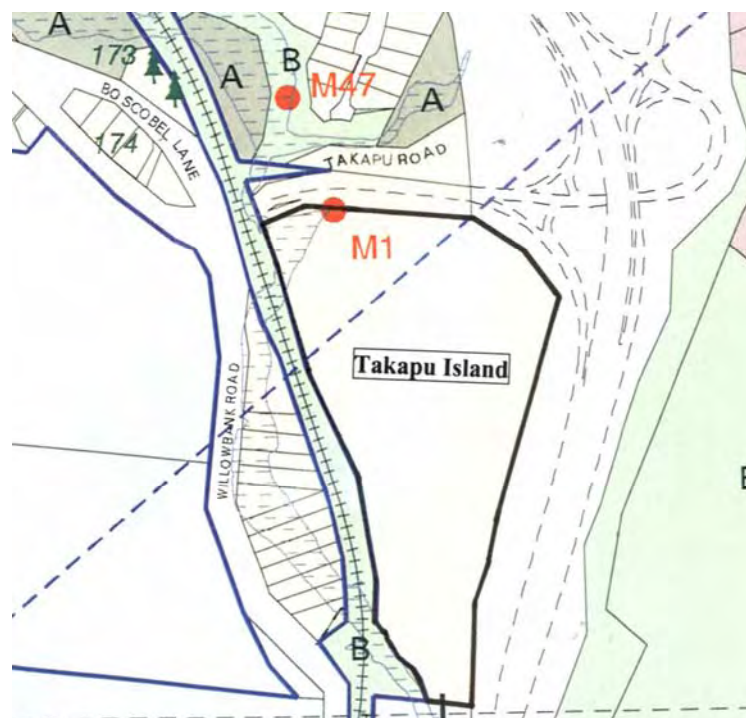
The site is currently shown on District Plan Map 30 as being subject to the Outer Residential Area provisions of the Wellington City District Plan.

The site is not subject to any special designations or character areas.

The site is adjacent to “M1” an annotation within the District Plan to show the locations of Heritage Items of significance to Maori. In this case, it shows the location of the Korokoro-Takapu track and is listed in the District Plan for the purposes of information only.

### 2.3 Site Features

The site has a total area 6.1613 hectares. It is located immediately to the south west of the Wellington-Porirua Motorway Tawa offramp. The extract below is from the Wellington City District Plan and shows the subject site.



The road which forms the northern boundary of the site is known as Takapu Road. Takapu Road from the motorway underpass through to the railway overbridge is gazetted for the purpose of motorway. This part of Takapu is seen as the “entrance” to Tawa.

The site has an existing access point from Takapu Road, with single gate, set back approximately 10 metres from the carriageway of Takapu Road is the only formed access into the site.

The eastern boundary of the site is bordered by the Wellington - Porirua Motorway. The boundary is marked by a post and wire fence and a row of mature pine trees.

The western boundary of the site is adjacent to the Main North Island Railway Line. Further to the west of the railway line is a row of residential houses which have frontage to Willowbank Road. The Porirua stream runs roughly parallel with the site, along this western boundary. The stream bed is generally either within private property or the rail corridor, though one of the banks of the stream is within the subject land, just after the stream flows under the rail bridge adjacent the north western corner of the site. The stream flows northwards past the site under the road/rail overpass at the end of Takapu Road.

The nearest neighbouring property, further to the west of Willowbank Road is the Arohata Womens prison. To the south of the site is rural zoned land.

With respect to the site itself, there is a poorly maintained bitumen track that runs south from the site entrance on Takapu Road, to a cluster of run down buildings located on a plateau on the northern end of the site. The past use of the buildings is somewhat indeterminable and they now appear to serve no particular purpose.

The northern end of the site is traversed by high voltage power lines. The site contains an important gas pipeline regulating (gas gate) facility that is owned by Powerco. This is located adjacent to the Takapu Road entrance to the site and is covered by an easement on the underlying certificate of title.

There is evidence that the site is currently lightly grazed. Other than this very light farming activity, the land is generally laying underutilized and vacant.

The vegetation on the site comprises bands of pine trees, blackberry and gorse clumps together with exotic grass pasture. There are areas of broom and other exotic trees. Native plants are generally isolated and there is little or no native vegetation regeneration occurring over the site at the time.

The land rises from Takapu Road to a high point in the middle of the site, roughly in the vicinity of the transmission pylon. The land falls away relatively quickly from this point towards the west and the railway corridor, but slopes more gently to the south.

### 3. Proposed Site Specific Provisions

The plan change proposal includes the addition of an appendix to the existing Chapter 7 (Suburban Centre) of the Wellington City Council District Plan. This appendix will be known as Appendix 8. It is also proposed that Rules 7.1.2 and 7.3.2 be amended so as to refer to the new appendix into the suburban centre rules.

The proposed Appendix 8 will have site specific provisions that relate to the design, construction and visual appearance of buildings on the site. It is also proposed that the visual appearance of earthworks and landscaping will be assessed for any proposed to development of the site.

The proposed amendments to rules 7.1.2 and 7.3.2 are set out below. The amendments to the rules are shown underlined.

|              |   |   |
|--------------|---|---|
| <b>7.1.3</b> | <b>The construction, alteration of, and addition to buildings and structures except for:</b>  | <i>For Pt Lot 2 DP 54434, Grenada refer to Appendix 7</i> |
|              | <ul style="list-style-type: none"><li>• <b>those specified as Controlled Activities, Discretionary Activities (Restricted) or Discretionary Activities (Unrestricted)</b></li></ul> |   |
|              | <b>are Permitted Activities provided that they comply with the following conditions:.....</b>   | <i>For Section 1 SO 23462 (Takapu Island) refer</i>       |



|                |  |  |
|----------------|--|--|
| <b>7.3.3</b>   | <b>The construction, alteration of, and addition to buildings and structures which do not meet one or more of the following conditions for Permitted Activities in rule 7.1.2:</b> | For Pt Lot 2 DP<br>54434,<br>Grenada, refer to<br>Appendix 7 |
| <b>7.3.2.1</b> | <b>maximum building height</b>   |  |
| <b>7.3.2.2</b> | <b>height control adjoining Residential Areas</b>  | <u>For Section 1 SO<br/>23462 (Takapu Island)</u>            |
| <b>7.3.2.3</b> | <b>coastal yards</b>   | <u>refer</u>   |
| <b>7.3.2.4</b> | <b>verandahs</b>   | <u>to Appendix 8</u>   |
| <b>7.3.2.5</b> | <b>display windows</b>   |  |

**or, where the building or structure would be a controlled activity under rule 7.2.1 or 7.2.2 but the standards and terms are not met**

**are Discretionary (Restricted) Activities in respect of:**

- **the condition(s) that are not met; and**
- **if consent is required because of failure to meet the standards and terms in rule 7.2.1 or 7.2.2; design, external appearance and siting.**

The effect of the proposed changes to Rules 7.1.2 and 7.3.2 is that any development proposed on Section 1 SO 23462 (being the land known as Takapu Island), will be that the Appendix 8 of the Suburban Centre Rules will then apply.

The plan change proposal introduces new rules contained in Appendix 8 that require consideration of the design and external appearance of buildings on the subject land in the resource consent process.

It is intended that the structure of the rules will be similar to the provisions already in the District Plan applying to Suburban Centre Zoned land in Grenada and set out in Appendix 7 of the Suburban Centre Rules. As part of the plan change proposal, the following Appendix to the those rules will apply:

**Appendix 8. Particular provisions for that part of the area situated in Tawa, immediately to the south of Takapu Road and west of the motorway mapped suburban centre (being Section 1 SO 23462 on the 1st May 2006)**

**The Suburban Centre Rules shall apply with the following exceptions:**

Rule 7.1.2 - Buildings being permitted activities

Rule 7.3.2 - Buildings being discretionary (restricted) activities

Rule 7.3.5 - Three or more household units at ground level being discretionary (restricted)

**The following additional rules shall apply:**

**1.1 The construction, alteration of, and addition to buildings and structures (excluding all signs, and fences two metres or less in height) is a Discretionary Activity (Restricted) in respect of:**

**1.1.1 building location**

**1.1.2 building materials and design elements**

**1.1.3 Landscaping**

**1.1.4 Earthworks**

**Assessment Criteria**

**In determining whether to grant consent and what conditions, if any, to impose, Council will have regard to the following criteria:**

1.1.5 The extent to which any adverse visual effects of buildings or structures on the surrounding environment can be mitigated by building materials and design elements, building location and landscaping.

1.1.6 The extent to which the density and height of landscaping between the proposed building and the motorway will mitigate any adverse visual effects of the proposed building(s) when viewed from the motorway and adjoining sites.

1.1.7 The extent to which earthworks are treated and landscaped to reduce potential visual effects.

**4. Anticipated Environmental Results**

The site is currently zoned in the Wellington City District Plan for residential development. The Northern Growth Management Plan was a comprehensive review of the land resources within the northern areas of Wellington and it has identified the site as being suitable for mixed use activity.

The current residential zoning is restrictive in terms of specifically enabling and promoting mixed use development. The underlying residential zoning encourages residential development within the site.

The result of the plan change will be that the land will be rezoned to Suburban Centre and therefore be able to be developed in accordance with the provisions of that zone, including mixed use outcomes.

An important proposed provision of the proposed changes will be the requirement to consider the visual effects on adjoining residential properties and the protection of amenity of the surrounding area. The anticipated environmental results of the plan change include the introduction of specific building and landscape design provisions for the site that ensure that a high quality built environment results from the plan change proposal, while allowing for mixed land use activities.

**5. Statutory Considerations**

Part II (sections 5, 6 and 7) of the RMA sets out the purposes and principles of the legislation. Section 5 of the Act states that:

(1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*

- (2) *In this Act, “sustainable management” means managing the use, developmental and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
- (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
  - (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
  - (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Sustainable management of resources is therefore the primary purpose of the Act and is relevant to this plan change request.

In addition to the primary purpose of the Act, additional guidance is provided and specific matters of national importance are listed in section 6. The matters of national importance are as follows:

6. *Matters of national importance*

*In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognize and provide for the following matters of national importance:*

- (a) *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:*
- (b) *The protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
- (c) *The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*
- (d) *The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:*
- (e) *The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.*
- (f) *The protection of historic heritage from inappropriate subdivision, use, and development.*
- (g) *The protection of recognised customary activities.*

Outside of promoting the sustainable use of natural and physical resources, we do not believe that there are any matters of national importance that relate to this plan change proposal.

Under section 7 of the Act, there is an obligation for persons exercising their functions and powers to manage the use, development and protection of natural resources, and shall have particular regard to the following relevant matters to this application:

- (a) *Kaitiakitanga*
- (aa) *The ethic of stewardship*
- (b) *The efficient use and development of natural and physical resources:*

- (ba) *The efficiency of the end use of energy*
- (c) *The maintenance and enhancement of amenity values*
- (d) *Intrinsic values of ecosystems*
- (f) *Maintenance and enhancement of the quality of the environment*
- (g) *Any finite characteristics of natural and physical resources*
- (i) *The effects of climate change*
- (j) *The benefits to be derived from the use and development of renewable energy.*

The matters raised above in section 7 that are particularly relevant to the proposed plan change are sections (7) (b), (c), (d), (f) and (g).

Under Section 73(1) of the Act, there is an obligation for all territorial authorities to have a district plan.

- (1) *There shall at all times be one district plan for each district prepared by the territorial authority in the manner set out in schedule 1.*

The basis on which a plan change can be requested is set out in section 73 (2) of the Resource Management Act. Section 73(2) states that:

*Any person may request a territorial authority to change a district plan, and the plan may be changed in the manner set out in Schedule 1.*

The matters to be considered by the Wellington City Council in considering a proposed plan change request are set out in section 74 of the Act and are as follows:

*74. Matters to be considered by territorial authority*

*(1) A territorial authority shall prepare and change its district plan in accordance with its functions under section 31, the provisions of Part 2, a direction given under section 25A(2), its duty under section 32, and any regulations.*

- (2) *In addition to the requirements of section 75(3) and (4), when preparing or changing a district plan, a territorial authority shall have regard to –*
  - (a) *Any –*
    - (i) *Proposed regional policy statement; or*
    - (ii) *Proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4; and*
  - (b) *Any –*

- (i) *Management plans and strategies prepared under other Acts; and*
  - (ii) *Repealed.*
  - (iia) *Relevant entry in the Historic Places Register; and*
  - (iii) *Regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taiapure, mahinga mataitai, or other non-commercial Maori customary fishing), - to the extent that their content has a bearing on resource management issues of the district; and*
- (c) *The extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.*
- (2A) *A territorial authority, when preparing or changing a district plan, must –*
- (a) *take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on resource management issues of the district; and*
  - (b) *recognise and provide for the management plan for a foreshore and seabed reserve adjoining its district, once the management plan has been lodged with the territorial authority, to the extent that its contents have a bearing on the resource management issues of the district.*
- (3) *In preparing or changing any district plan, a territorial authority must not have regard to trade competition.*

The authority for Takapu Island Developments Ltd to apply for the plan change is clearly available under s73 of the Act.

As stated above in section 74(1) of the Act, Council has the ability to prepare and change its District Plan. During that process, it is also obligated to consider its Part II of the Act, with the primary issue being the sustainable management of resources.

We note that the relevant documents and matters to be considered under the request for a plan change will include the Greater Wellington Regional Policy Statement and the relevant Greater Wellington Regional Plans. It is recognized that any District Plan and therefore by inference, any district plan change request, should not be inconsistent with the Greater Wellington Regional Policy Statements or any of the existing Regional Plans.

We also note that the Council have consulted on and prepared a planning document which relates to the subject site and the surrounding area. This being the Northern Growth Management Plan. That document is relevant to the plan change request.

## 6. Development Concept

The plan change request submitted to Council specifically relates to a change of zone for the site and the addition of rules which control the design and external appearance of building and site works. The proposed rules do not specifically address the future use of the site, however the zoning will better facilitate the uses identified in the NGMF.

In order to assess the potential environmental effects, several development concept plans have been prepared. The purpose of these plans has been primarily to determine feasibility of development on the site and what that development might look like.

Some discussion during the consultation phase of the plan change considered the preparation of a structure plan. The preparation of a structure plan for such a (relatively) small site was however considered to be impractical. A structure plan, on this scale would basically be required to be a

development plan. The area under consideration is effectively only around 3 to 4 hectares of developable area.

Instead of preparing a structure plan, several aspects of the development have been considered and where possible, indicative plans have been prepared showing how development may be achieved on the subject site. The three plans that have been prepared which show indicative development are as follows:

- ◆ Site Access
- ◆ Earthworks
- ◆ Building Layout and Site Use
- ◆ Landscape Concept Plan

Each of these development concept plans are discussed below.

### Access and Traffic Management

One of the most critical matters to resolve in order to determine the feasibility of development options for this site has been site access. The land has been dubbed "Takapu Island" in reference to its relative isolation.

To the east, all access is prohibited by the Porirua Motorway. Access from the west to Willowbank Road is restricted by topography and the North Island Main Trunk Railway. While some access could be achieved to Willowbank Road via this route, it and is likely to be limited. Access from Willowbank Road was generally thought to be avoided if at all possible so as to avoid significant adverse effects on amenity and road safety on the local environment. Having said this, some limited access may be facilitated from Willowbank Road in future, subject to obtaining all necessary consents and agreements.

If the site is to be rezoned to Suburban Centre, the only practical access point for the site was Takapu Road to the north. The land immediately in front of the site is within land held by Transit for motorway.

Following considerable consultation with Transit NZ officers and Council's Traffic engineers, a practical solution was formally agreed to by these parties.

It is generally recognized that the existing 1960's standard Tawa off ramp is now below the current safety standards. Opus International Traffic engineers have designed a new roundabout that would be constructed to modern standards and alleviate existing safety issues. The new roundabout would accommodate for the additional traffic generated by the subject site as well as accommodating some future growth from Lincolnshire Farm.

Depending on the development options for the site, a second smaller roundabout would be constructed to form actual access into the subject site. This roundabout would safely accommodate the traffic generated from the majority of potential land uses undertaken within the subject site.

The Opus International Consultants Layout Plan is attached and is numbered 5C1019.00 Sheet 01/R0. While this layout, cannot formally be part of the plan change proposal, it is generally accepted by the site owners that any future development options under the Suburban Centre zoning

would be expected to utilize this specific design and layout during development. The proposal shown on the Opus International plan would be a condition of any resource consent to develop the site.

### Earthworks

In an area of 6 hectares, it has been determined that there is likely only to be more or less 3 to 4 hectares of developable land. An earthworks plan has been prepared as part of the feasibility plan for the site.

The earthworks plan will be the subject of the necessary land use consents. The plan is attached to the information included in the request for a plan change. The plan was prepared by Spencer Holmes Ltd and is numbered SO5-0484-02/A. The earthworks plan shows the access into the site, likely earthworks batters and the platforms for development.

An upper development platform of 2.9 hectares, adjacent to the motorway will be formed. A lower platform of 0.37 hectares is formed adjacent to the north western corner, in the vicinity of Takapu Railway Station platform.

The earthworks plan should not be considered to be a final development option and may be subject to modification during the development phase of the project.

The volume of earthworks for the works outlined above, is relatively substantial, at approximately 125,000m<sup>3</sup> of cut will a fill of 108,000m<sup>3</sup>. In this feasibility plan, the surplus cut to fill is of the order of 17,000m<sup>3</sup>. However it is anticipated that a better cut to fill balance could be achieved in the final earthworks development for the project.

It is anticipated that a good quantity of excess material can be utilized during roadworks necessary to upgrade the Tawa off ramp as outlined above. The material may be utilized for filling projects in the vicinity of the site, to minimize vehicle movements during the development works.

In any case, during the resource consent process, it is anticipated that a construction management plan will be required to be developed to consider the potential traffic, noise, siltation and dust effects from the earthworks project.

### Potential Building Layout

In order to assess the potential visual effects of the proposed plan change and in light of the proposed building, landscaping and earthworks criteria, an indicative building layout has been prepared.

The attached plan developed by the architect Graeme Farr, is shown on Spencer Holmes Plan SO5-0484-01/A. This indicative building layout plan has been developed to respond to the earthworks and access proposals discussed above.

We re-iterate that this layout is not part of the formal proposal. While the access layout for the site outlined above, is more or less “fixed”, other parts of the development in terms of earthworks and building development could vary significantly. The actual layout of development on the site may vary considerably, however the layout proposed is illustrative and indicates an option that could occur and would reflect the likely effects of the proposal.

This plan shows how various uses and activity can be integrated into the site. The plan shows The residential land being located in the south of the site, away from the transmission lines. While there may have been some synergies available in terms of the location of residential development in proximity to the Takapu Railway station, the presence of the high voltage transmission lines would more appropriately require location of the residential activity away from the north western corner.

Commercial development of the site is appropriately placed along the eastern boundary adjacent to the motorway. This allows for the greatest degree of separation and screening of residential development on the site. It also allows for landscaping options along the eastern boundary adjacent to the stream and existing residential properties with frontage to Willowbank Road.

### Landscape Concept Plan

A landscape concept plan has been provided with the application, which indicates how planting could be carried out on site which mitigates the potential affects of earthworks and development on the site.

The plan has been developed by Isthmus Group Landscape Architects. Once again, this development concept plan is one which is indicative only and provides an example only, of the type of development that could be undertaken on the site.

## 7. The Northern Growth Management Framework (NGMF)

The Wellington City Council has identified the fact that the majority of the city’s growth over the next 20 years will occur in the northern suburbs of the city. The area from the Ngauranga Gorge north, up to through the Tawa Valley to the boundary with Porirua City Council.

The NGMF describes itself as follows:

The Northern Area Framework for Growth Management (NGMF) provides a ‘strategy for achievement’ for the future development of the northern part of Wellington City. It provides the communities, landowners, developers and Wellington City Council a set of goals and an agreed process for planning urban expansion together. It’s a framework rather than a detailed master plan because although it must provide some certainty for the community, it must also allow appropriate flexibility for refinement. The NGMF describes the themes, values and principles that will help us to reach a vision of an integrated, liveable, sustainable and prosperous community. An implementation programme based on this Framework will identify key initiatives and outline how those initiatives can be made to happen.

The NGMF is therefore not a statutory document under the Resource Management Act, but it is a “recognized” planning document and represents the current policy framework for the area. It was developed through public consultation and submissions were received from interested parties. The NGMF was ratified by Council on the 20 October 2003.



As the NGMF is not a formal planning document, the identified “*strategies for achievement*” are not automatically part of the District Plan. In order to implement the strategies of the NGMF, a number of different implementation methods are to be used. The implementation methods include formal plan changes.

The vision for the NGMF is stated as being:

*“Wellington’s northern suburbs will continue to develop as an integrated, liveable, diverse, sustainable and prosperous community.”*

The objectives of the NGMF are as follows:

- ◆ *To consolidate the northern part of Wellington City into a highly attractive, efficient and accessible urban area that realizes its potential of contributing to the city as a whole.*
- ◆ *To enhance, protect and link significant landscape, ecological and natural features of the area as a foundation for sustainable urban living.*

The themes of the NGMF are identified as follows:

*Liveability - supporting existing communities and ensuring a quality urban form for a quality lifestyle.*

*Sustainability - managing growth in a sustainable way and responding to our environment*

*Accessibility - making it easy to access services and amenities – for work, pleasure, support*

*Connectivity - integrating the movement network and enhancing linkages within and between communities and to the city and region.*

*Prosperity - providing a climate for commercial enterprises and local businesses to thrive*

The NGMF has a number of direct references to the Takapu Island site or to the areas/connections immediately around it.

The site specifically identified several figures within the NGMF document. For example in Figure 9, the site is shown, with mixed use activities, together with identified access options.

The current site development proposal, while not specific in its identified end use, is about facilitating mixed use. Access from Willowbank Road has been investigated and generally found to not be as practical as the option to have access from Takapu Road as outlined above.

Park and ride facilities will improve access to public transport. Figure 8 gives a suggestion for Johnsonville; figure 9 illustrates how facilities could be improved at Takapu.



The NGMF supports to concept of building on existing communities, rather than creating new ones. It identifies several ways of doing this which are relevant to the subject site. These include increasing park and ride capacity at Takapu station. The proposal will allow for the development of Park and Ride facilities.

#### The NGMF

Section 4 of the NGMF introduces the concept of “Creating a Green and Blue Network”. These concepts relate to the protection and enhancement of vegetation and water resources. The site itself does not contain significant vegetation or water resources. It is however adjacent to the Porirua Stream. The development concept includes stormwater retention ponds and potential wetland creation. This concept is consistent with the flooding protection and ecological protection intentions of the NGMF.

The intend upgrade of the Tawa Off ramp will achieve other outcomes sought in section 5 of the NGMF including:

- *Improve the safety and performance of the Tawa motorway interchange.*
- *Improve the safety and ease of flow of traffic along Johnsonville Road, Middleton Road, Willowbank Road and Tawa Main Road.*
- *Support the development of road linkages from Woodridge to Lincolnshire Farm and from Lincolnshire Farm and Grenada Village to Grenada North.*

All three of these abovementioned roading/connections identified in the NGMF are facilitated to some degree by the current proposal. As well as the aesthetics, the NGMF has also identified that support of the local the economy and jobs creation within the NGMF area is an important outcome. This play in together with the building upon existing communities. The creation of jobs adjacent to, or within an existing established residential/commercial area is an outcome sought under the framework.

In this case, the mixed use zoning (suburban centre) potentially facilitates a number of the outcomes sought by the framework in this regard. The site potentially creates sites for employment creation, develops and supports the Takapu Railway station facilities and the wider transport facilities

## 8. Assessment of Environment Effects

When considering the environmental effects of the proposal, it is primarily relevant to consider the purpose of the Resource Management Act (RMA). That is “*to promote the sustainable management of natural and physical resources.*”

Ultimately, any outcomes reached under the RMA, including a district plan change, must be consistent with the over-riding purpose of the Act being the promotion of sustainable management of resources. In this case, the resource under consideration is the land resources within the Wellington City Council Area.

In considering the environmental effects of the proposed plan change, it must be accepted that the site is currently zoned Outer Residential. Therefore, there will be a number of environmental effects which are anticipated by the District Plan. While resource consent would be required to facilitate large residential developments, it would be anticipated by the District Plan that residential development could occur. The resource consent process is primarily required to consider the appropriateness of any proposed residential development within the context of the Outer Residential Zone objectives, policies and rules.

In the case of this proposed plan change, the consideration should be given to whether changing the zoning from Outer Residential to Suburban Centre promotes a more sustainable use of the land resource.

We have identified the following matters as being relevant effects to be considered.

- ◆ Traffic Generation
- ◆ Transportation and Public Transport
- ◆ Efficient Use of Land
- ◆ Amenity Values
- ◆ Visual and Landscape Effects
- ◆ Ecological Effects
- ◆ Flooding and Hazards
- ◆ Historical Value and Heritage
- ◆ Reverse Sensitivity

Each of the identified effects on the environment will be discussed in turn.

### Traffic Generation

In order to assess the environment effects of the proposed plan change, an experienced traffic engineer (Traffic Design Group) has carried out an assessment of the environmental effects of the proposal. A report into traffic and access arrangements has been carried out and is attached to this application.

In light of the proposal to rezone the site from Outer Residential, an assessment of the traffic generated from likely/possible land uses on the site under Suburban Centre was undertaken. The original report and further information requested by Transit during consultation was prepared by Traffic Design Group (TDG). The likely effects on the surrounding area were determined and the report details those effects on the local roading network.

Consultation was undertaken with Council’s traffic engineers and Transit NZ. Transit were consulted on the grounds that the site is adjacent to the motorway and access to the site is via land designated for Motorway access.

During the consultation process, Transit NZ and the WCC traffic engineer identified their desire to see the current Tawa off ramp modified and upgraded. This was seen as an imperative that would allow development to be undertaken on the site.

Modification of the Tawa off-ramp is seen as an important pre-cursor to development on the Takapu Site. Development on the subject could not occur on a large scale unless the matter of access was resolved, be it under the current residential zoning or under the proposed suburban centre zoning.

As part of this consultation, a modified Tawa Off ramp redesign was undertaken by Opus International Consultants. The design for the off ramp was undertaken and a new round-about together with a mini-round-about for access to the subject site was developed.

The capacity of the round-about, detailed in the development concept above, is such that it will have positive functional and safety effects with respect to traffic movement. The development of the round about itself would be essential part of the NGMF implementation plans.

The report by TDG considers the NGMF implementation, particularly the Lincolnshire Farm development (see Lincolnshire Farm proposed structure plan in appendix 6). Lincolnshire farm is a major development area within the NGMF. There are intended links between Lincolnshire Farm and Takapu which will be reliant, at least in part on the Tawa/Takapu inconections.

The upgrading of the Tawa offramp will be a vital component of the implementation of the NGMF, in terms of accommodating the significant volumes of traffic generated in the North Grenada/ Lincolnshire Farm areas during the implementation period of the overall NGMF period .

This proposal will be the construction of the new roundabout which will extend the life of the current off ramp and Takapu Road connections for at least 12 to 15 years.

The site is currently zoned Residential. There will of course be traffic generated by residential development on the site. Those effects would need to be mitigated by traffic improvements to the off ramp and similar measures implemented to gain access to the site.

There will potentially be additional traffic generated by rezoning the site from Residential to Suburban Centre, however we note the conclusions of TDG who confirm that the capacity of the new round-about will easily accommodate the traffic generated by the site, as well as catering for traffic increases in the wider area.

As this proposed plan change will lead indirectly to the construction of the new off ramp, we have concluded that the effects on the local and wider roading network in terms of traffic generation and management, will largely be positive.

### Transportation and Public Transport

The NGMF has identified that increased patronage of the main railway line is an important outcome for growth within the area over the next 15 to 20 years. It was also identified that additional stations were not to be promoted as that would increase traveling times into the city.

The NGMF has recommended focusing connections to existing stations such as Takapu Road Station. In this case, the site itself can potentially connect straight into the platform of Takapu Road.

This potential connection to Takapu Station creates two opportunities. Firstly, there is the possibility that park and ride facilities can be provided on site, adjacent to Takapu Station platform. The rezoning of the site from Outer Residential to Suburban Centre is consistent with this outcome and supports the plan change.

The second opportunity with this site is that future employment development and residential living within close distance from the railway station supports public transport use.

While the residential zoning of the site allows for the positive effects of future residents using the transport links, the suburban centre zoning also promotes commuters who live outside the site, to use public transport when coming to the site for work, or to commute off site to other employment areas.

### Efficient Use of Land

Currently, the site is underutilized. The land itself serves little or no function, being limited to sporadic, very low intensity grazing.

The land is identified within the District Plan as being a site suitable for residential development. Its zoning as Outer Residential must create some expectation in the wider community that it will be developed for that purpose in future.

While it is noted that the land currently provides some rural amenity to the local area, this contribution is not given any statutory status. Further to this, the NGMF has identified that the site would be appropriately used for mixed use purposes.

One of the factors that must be considered with this proposal is that access into the site is very difficult. The land was formerly described by being a “marginal strip”. This description implies that it is a piece of marginal land, cut out of some larger holding, with no purpose or function, with limited access to a formed legal road. Having said this, the total area is some 6 hectares. There are very few, such large residentially zoned areas within the city.

The land is isolated from adjoining land and transport connections (note even a bridge is necessary to connect to Takapu Railway station platform because of Porirua Stream) are very limited. The fact that the motorway (Takapu Road) and the Main North Island Railway cut the site off on 3 sides, has resulted in the land being referred to as an “island”.

The costs of solving the road connection problems will be significant. The cost of upgrading the Tawa off ramp and constructing the roundabout has been estimated to be of the order of \$1.4 million.

As will be discussed further in the S32 analysis below, the costs associated with gaining access to the site for purely residential development on the site, would in practice be prohibitive. The returns and other costs associated with residential development of the site would not enable a feasible return to the owners, therefore the impetus to carry out the development would be lost.

By rezoning to Suburban Centre, the additional potential commercial value of the sites (or part thereof) will allow a return to the owners to justify the capital outlay necessary to resolve the access issues.

Therefore, the current zoning of the land as residential, is in effect a redundant zoning. The land is not of sufficient size to enable a commercial rural activity to be undertaken, therefore rezoning to rural would be also an inefficient or impractical exercise. The site has no particular conservation or open space value that would justify the land being a park and therefore zoned Open Space or Conservation Zone.

The loss of opportunity to develop the land, without any obvious or practical alternative land use, is therefore an efficient use of the land resource with the Wellington City Council area.

We are also aware that the current demand for commercial land within the wider Wellington area is very high. This land, while zoned residential, is at least in part, unsuitable for large scale residential development due to the presence of the gas regulating station, the high voltage power lines, the close proximity to the railway lines and motorway.

The same factors (such as proximity to the motorway) that make the land have a reduced value as a residential site, have the effect of making the land more suitable for commercial due to the exposure given the site by the motorway.

Considering all the factors discussed above, we have reached the conclusion that the rezoning of the land from residential to Suburban Centre will have positive effects on the efficient use of the land and on the land resources within the Wellington City Council area.

### Visual and Landscape Effects

The site will be required to be earthworked to enable a residential or commercial development to be undertaken. During the earthworks period, there would be adverse visual effects from those earthworks.

In order to assess the likely visual effects and outline the likely landscape mitigation measures possible for the site. An assessment of the visual and landscape qualities of the site was undertaken by Isthmus Group Landscape Architects.

We note that under the current residential area rules, any residential development of the site would likely result in earthworks. Under the residential area rules there are rules which require assessment and mitigation measures to be undertaken for earthworks which exceed permitted activity standards.

The “standard” suburban centre rules do not include rules to control earthworks. The current plan change proposal includes criteria for new development which will control the adverse visual effects of the earthworks.

The permitted activity standards of the residential area rules would allow the construction of buildings on the site. There would be an expectation that the site would be subdivided and developed.

Under the proposed Suburban Centre rules applying to this site, it is intended that rules will apply to new buildings so that the materials and design can be controlled. The intention of the plan change is that a high quality built environment will result. This includes a requirement to include landscaping as part of any application to build on the land.

During consultation there has been some concern relating to the loss of rural character as a result of development on the site. We note that the land is of course zoned residential. We accept however that the existing landscape character of the area does provide a rural backdrop to the residential area along Willowbank Road.

A residential development over the site would result in a loss of the rural character. The District Plan does not set out to require development on this site to preserve the existing rural character of the area.

The requirement to have buildings and earthworks assessed in terms of materials, design and landscaping will ensure that adverse visual effects will be mitigated during development on the site.

The general landscape value of the site is severely degraded by the high voltage power lines that cross the site, together with the gas regulation site. The site does not have high landscape values as a result of existing vegetation, though the trees along the Takapu frontage would make some positive contribution. A number of these trees were recently removed from site by Powerco in order to protect their gas station.

Isthmus Group have recognized in their assessment that the removal of vegetation on site, particularly the mature trees, will have some adverse visual effects. This is accepted, however from a planning perspective, the removal of trees is an outcome that could occur from development under the residential area zoning and is a permitted activity. Isthmus have acknowledged that future effects from earthworks will be temporary and that mitigation planting will ensure that the effects of these works is satisfactorily mitigated.

In accordance with the conclusion of Isthmus Group, we are satisfied that the adverse effects on the environment in terms of landscape and visual effects will be minor.

## Amenity Values

Amenity Values are defined under the RMA as

*"means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes."*

The site makes some positive effects to amenity values in the wider area. As discussed above, some residents of Willowbank Road have expressed concerns with respect to the potential loss of rural character.

The existing trees along the northern and eastern boundaries would also add some aesthetic quality to the off ramp and entrance to Tawa, but as discussed above, under landscape effects, the contribution to the wider amenity values is relatively low.

In general terms, however, it must be concluded that the amenity of the site itself is moderate at best. The sites contribution to the amenity values of the wider area is also low to moderate. The proposed rezoning, given the existing residential zoning, would have very minor adverse effects on the amenity values of the site, the immediate area and the wider environment.

The proposed rules for the suburban centre zoning will consider the quality of any built environment and to consider landscaping at the time of development. This is a significant mitigating factor for the amenity values of the surrounding area.

## Ecological Effects

No sites of high or even medium ecological value have been identified within the site during the site inspection and during the consultation process. The only potential ecological effects that could occur from development of the site are limited to the effects on Porirua Stream.

Development on the site, will not in itself affect the stream, however works on the banks and within the site itself could result in siltation entering the stream and therefore having adverse effects on water quality and the stream environment.

These type of effects are generally addressed under the Greater Wellington Regional Council (GWRC) Plans. The development and implementation of a erosion and sediment control plan, enforced under a resource consent from the GWRC (Freshwater Plan) would ensure that any potential effects in this regard are mitigated to such an extent that they can be considered to be minor.

## Flooding and Hazards

The site is identified as being subject to a flood hazard area. The hazard area is immediately adjacent to Takapu Station.

It is recognized that development of the site, which includes roading, buildings and hard surface areas has the potential to increase runoff from the site and reduce the time of concentration of that run off. These factors can lead directly to downstream flooding effects.

We note however that these potential effects could occur under the residential zoning. The only difference is that under suburban centre zoning there is no limit on site coverage. Under the residential zoning building coverage is limited to 35% of overall site area. There is however no restriction on hard surface areas.

It is noted that the Porirua Stream adjacent to the site and further downstream, is already been identified in the District Plan as being subject to a hazard zone.

Flooding is largely a matter controlled by the Greater Wellington Regional Council and the various Regional Plans identify the requirements for discharge and detention of stormwater areas. However, the City Council has in their District Plan identified the areas of the Tawa Valley where flooding occurs as a result of high rainfall within the Porirua Stream.

The consideration in this case is how a change from an Outer Residential zone to Suburban Centre will potentially affect the discharge of stormwater from the site. It is acknowledged that the Outer Residential zone allows a building coverage of 35% while Suburban Centre allows for 100% coverage, thereby potentially allowing for a larger amount of hard surface area.

The hard surface area increases the rate of runoff and therefore reduces the time of concentration for stormwater flows, thereby potentially increasing the risk of flooding occurring.

Engineers for Spencer Holmes have calculated the catchment areas and determined that on site stormwater retention ponds can be provided which will reduce the flooding risks from development on the site to less than that of the current zoning.

In addition to detaining stormwater to reduce flooding risks, the stormwater retention areas have other significant positive effects. The retention areas are planted out and therefore contribute positively on landscaping values. They also provide habitat areas for native birds. Furthermore, they serve as defacto stormwater treatment areas by retaining contaminants, assisting in increasing the water quality that is eventually discharged to the Porirua Stream area.

Therefore, on the basis that adequate stormwater retention/detention areas are provided when development is undertaken on the site, we are confident in concluding that there will be very only minor or no adverse effects on the flooding hazard as a result of the Plan Change.

The site is not within any other identified hazard zone under the District Plan. It is therefore not been identified as being at considerable more at risk of hazards such as from seismic activity than other land in the Wellington City Council area.

#### Historical Value and Heritage

The District Plan does not identify any heritage items within the site, though notes the Maori Heritage item being the Korokoro-Takapu Track to the north. Consultation with the Tenth's Trust and Ngati Toa has not identified this as a significant issue.

Consultation the Historic Places Trust (HPT) has not identified any other heritage matters, though the HPT does raise the issue of the requirements of Section 10 of the Historic Places Act 1993. Section 10 obligates a person wishing to undertake works to obtain an authority from the HPT where there is reasonable cause to suspect an archaeological site is within the affected area. An archaeological site would be one in which there is evidence of human activity prior to 1900.

In this case, the Glenside Progressive Association has provided information relating to a bush hut construction on the site in the 1840 to 1855. According to the information from Claire Bibby, this hut was owned by an early settler CJ Harrison. The site of the hut is currently marked by a small stand of hawthorn trees.

The Glenside Progressive Association has requested that this area be incorporated into a small reserve or community park. In this case however, the location of the trees will be subject to earthworks and the trees removed. The heritage values present in the area, especially as such a proposal would compromise the whole development.

An archaeological permit is about to be sought for the site and an archeologist will be commissioned to carry out the necessary investigation. The archaeological process is separate to the resource consent process, however all due care is being taken to ensure these matters are satisfactorily addressed.

#### Reverse Sensitivity



The potential for reverse sensitivity effects to result from the rezoning of the site from outer residential to suburban centre was raised during consultation. The issue was largely concerned with the operation of the railway line. This noise generated by trains and their passengers, could in theory, cause adverse effects on activity the site. These effects could lead to complaint and curtailment of the operation of the railway line.

In that respect, we are comfortable that there are no adverse effects in that regard. It is relevant to note that the site already has a residential zoning. The change of zone from residential to suburban centre is most likely to actually decrease the sensitivity of the receiving environment from noise generated by the train line.

The permitted noise standards applying to residential (on site generation of noise) activity is more restrictive than those relating the suburban centre.

We are of the opinion that there are no other reverse sensitivity issues relevant to the proposal.

## 9. Consultation

Prior to the preparation of the proposed Plan Change Request, consultation was undertaken with the following parties.

- ◆ The Department of Conservation (DOC)
- ◆ The Wellington Tenth Trust
- ◆ Ngati Toa
- ◆ Greater Wellington Regional Council (GWRC)
- ◆ Transit NZ
- ◆ Wellington City Council – Traffic Engineers
- ◆ Historic Places Trust
- ◆ OnTrack – New Zealand Railways Corporation
- ◆ Tawa Community Board
- ◆ Tawa Progressive & Ratepayers Association
- ◆ Glenside Progressive Association
- ◆ Friends of Tawa Bush
- ◆ Owners of from numbers 1 to 27 Willowbank Road
- ◆ Owner of 420 Middleton Road
- ◆ Owner of 491 Middleton Road

Letters/emails were sent to all parties listed above.

All responses to consultation are attached in Appendix Six below.

DOC did not consider themselves to be an affected party for the proposal.

The recognized Tangata Whenu for the area are represented by the Wellington Tenth Trust and Miria Pomare for Ngati Toa. The Tenth Trust did not have any concerns and no response was received from Ngati Toa.

GWRC raised concerns as to how stormwater would be disposed and the methods used. While this is a resource consent issue, our response to those concerns is contained within the description of the proposal and the assessment of effects above. The provision of the Park and Ride facility was discussed with relevant officer (Kevin Grace) from the Council. Initial discussions confirmed the possibility of the Council supporting the site for a park and ride facility.

Transit NZ were consulted in detail in conjunction with the Wellington City Council's traffic engineer Steve Harte. Support was given to the roundabout detailed in the application above.

The Historic Places Trust raised the possible requirement for an authority to excavate. An archeologist has been instructed to undertake this work. An authority will be sought as required.

OnTrack sought further information in respect to the noise requirements applying to the site and the potential for reverse sensitivity issues to have an effect on their operation. We responded that

the noise requirements of suburban centre are not as stringent as Outer Residential area and therefore the likelihood of reverse sensitivity issues being raised was reduced.

The proposal was presented to a meeting of the Tawa Community Board. The board were able to ask various questions in relation to the proposal. Some concern was expressed about the ability of the new roundabout to accommodate large trucks coming through from Takapu. Confirmation of the ability of the roundabout to meet this demand was sent to the Board and examples of similar roundabouts currently operating in the wider Wellington region were given.

Tawa Progressive & Ratepayers Association raised no issues with respect to the plan change.

The Glenside Progressive Association provided information relating to the historical use of the site and requested that a small public reserve be set aside around an old homestead. They also requested that the main stream remain open and not culverted. Also that the discharge point for stormwater be upstream of the Willowbank Road settlement. The final request was that a bufferzone of trees be planted along the northern end of the development to screen Greer House.

The Friends of Tawa Bush thought the proposal was consistent with the NGMF and therefore did not oppose.

Several responses were received from owners of properties on Willowbank Road. The major issue raised by these residents was the preservation of the existing rural amenity and the request for a buffer zone along the western side of the development area.

A detailed submission was received from Ian Woodmore of 17 Richmond Hill. Mr Woodmore considered the rezoning of the site to Suburban Centre was inconsistent with the workshops and outcomes identified during the Northern Growth Management Framework.

## 10. Conclusion

After considering the matters raised in consultation and the assessment of environment effects given about, we are of the opinion that the proposed plan change will be consistent with the primary purpose of the RMA. That purpose is the sustainable use of natural and physical resources.

The environmental effects resulting from the proposed plan change will allow for a more efficient use of the under utilized site without having any more than very minor adverse effects on the amenity of the surrounding area.

The proposed plan change will be consistent with the outcomes sought in the NGMF and will facilitate the implementation of several important transport and roading projects required under the framework.

We are therefore confident that Council, in exercising their statutory responsibilities must support the plan change.

22<sup>nd</sup> September 2006

Wellington City Council  
District Plan Policy  
P.O Box 2199  
WELLINGTON

ATTN: Brett McKay

Dear Brett

### **Re: Request for Plan Change - Takapu Island, Tawa – Further Information**

We are writing in response to your letter dated the 7<sup>th</sup> August 2006 where you have requested further information with respect to the plan change submitted to Council in July this year. There are two matters on which you have requested further information.

The first of these relates primarily to Council officers concerns that the site could potentially become a retail centre under the suburban centre rules. Council officers appear to have a concern that this could potentially have effects the viability of established retail areas within the city. In particular you have asked for information on the impact on the surrounding area of big box retail activity and how those effects might be mitigated.

The other concern outlined in your letter, is that Council wish to ensure that the site is not developed in an ad hoc or piecemeal fashion. We intend on responding to each of these matters in turn.

### ***Retail Activity***

The proposal to rezone to suburban centre is intended to allow a range of commercial, or industrial or residential uses on the site as of right. The land, as outlined in the information submitted in the request for plan change, is not primarily suited to “outer” residential development. The densities of development “permitted” under the Outer Residential zone are the lowest in the Wellington City area. A suggestion has been made that a retirement village is an option for development on the site. This was discussed with the owners who have indicated that this type of development suffers from the same inherent issues as any residential use.

It was understood from the consultation with officers leading up to the lodging of the request for a plan change, that Council were looking for a mixed use for the site that was likely to include some residential. In meetings with Council officers subsequent to the lodging of the request for a plan change, it was indicated that a residential use of the site was not an imperative. It was indicated that future proposals with no residential component, would still be acceptable in terms of Council’s wider strategic outcomes including the Northern Growth Management Framework (NGMF).

The request for further information specifically raised Council officer concerns over retail use on the site. The use of the site for retail activity (in particular big box retail) was not an imperative outcome of the rezoning proposal. While flexibility in the potential future uses of the land is an advantage in terms of commercial value, the owners of the site are prepared to modify the plan change proposal to address the effects raised in relation to future retail and in particular, big box retail activity.

#### *Adjacent Land District Plan Change*

District Plan Change (DPC) 45 relates to land in the vicinity of the subject site, including Stebbings Valley and Lincolnshire Farm. DPC 45 was only recently notified by Wellington City Council. DPC involved the

replacement of the existing Suburban Centre Area (Appendix 7) rules that are currently operative and within the Lincolnshire Farm Area.

DPC 45 has introduced the concept of an “Urban Development Area” (UDA). This concept works in conjunction with a specific structure plan for the area. The UDA is effectively an ‘all zone, all uses’ area. Land use and building development is to be controlled by the proposed structure plan. It does introduce a restriction on retail uses via standards and terms within relevant rules. The relevant rule in this case, is 28.3.4. The standards and terms of that rule states:

*“In employment areas, any retail activities must be ancillary to the primary activity on the site or not exceed 500m<sup>2</sup> of GFA.”*

*Council’s Relevant Retail Planning Documents – Fragmentation*

You have stated in your letter that the Council’s Retail Strategy, Urban Development Strategy (UDS) and Wellington Regional Strategy (WRS) supports the consolidation of significant new retail in suburban areas and areas adjacent to established suburban centres.

You have also stated that Council officers are concerned that large format, or big box retail areas could be established on this site which is outside an established commercial centre.

The Retail Strategy Document discusses the retail areas in Downtown Wellington, Downtown Wellington Fringe and Suburban areas. Fragmentation of retail centres is specifically discussed in section 5.2.2 (Downtown Fringe) and states:

*“Most significantly, there is a risk that large format retailers will locate wherever sites can be secured, even though they prefer to locate close to an existing shopping base. Large format retailers are already investigation possible locations in out-of-centre sites away from existing retail centres. The main implication of this is the increased fragmentation of the retail network and the associated problems of accessibility and the impact of increased traffic generation.”*

The issues specifically raised are fragmentation of retail activity, access and increased traffic generation. The Takapu Island site is not within the Downtown Fringe. It is also geographically separated from Wellington City downtown areas. It is closer to the Porirua “shopping destination” areas. The Council in its Retail Strategy document recognises that the advantages of facilitation of big box retail in the CBD fringe is “less drive time to other regional centres.”

This site (if it were to become a retail site) would potentially not compete with Wellington CBD fringe areas. It is located (in terms of travelling times) more or less equidistantly between Porirua and Johnsonville centres. One of the advantages of locating retail/employment in this area is the reduced travelling times between the other more distant centres in Johnsonville and in particular Porirua. Such a reduction in travelling times for the soon to be developed Lincolnshire farm growth areas, must be a more positive and sustainable use of land resources than requiring such centres to be located a large distance from the existing Tawa and the proposed Lincolnshire Farm communities.

I note in your letter that Council are of the opinion that “destination” shopping on this site would be “totally dependant on customers arriving by car.” Certainly, the implication that this site is not well connected is simply untrue. The site has a number of advantages in terms of its transport links.

The proximity of the development to the Takapu Railway station would clearly enable shoppers/workers to travel to the site by rail.

It is also in close proximity to existing and proposed “park and ride” facilities which have been an important element of the future development of the site. While park and ride facilities involve car transport, the location of some retail facilities in this location, would potentially result in a reduction of vehicle movements. For example, commuters using the park and ride facilities may incorporate shopping activity prior to or after connecting with train transport to the CBD.

Provision has been made in the site access for bicycle and pedestrian links. The modifications to the road access on Takapu Road submitted with the plan change information are much more pedestrian and bicycle friendly than the existing roading environment.

Furthermore, there would be no impediment to the development of road public transportation options, such as buses, into and adjacent to the site. The slowing of motorway traffic via the new roundabout would facilitate a bus stop immediately adjacent the site, thereby enabling connection to the railway

station. The site is located on one of the links to the future Lincolnshire farm development (Takapu Road). It is therefore almost a certainty that in future, bus links will be developed between Lincolnshire Farm and the Takapu railway station.

#### *Takapu Island Plan Change*

In Council's request for further information, the concerns expressed relate specifically to "big box retail". A definition of big box retail is provided. Typically, we understand that retail areas required for big box retail need floor areas of significantly larger areas than the 500m<sup>2</sup> trigger set out in DPC 45 provisions. Typically, large format retailing requires an area of well in excess of 2000m<sup>2</sup>. It is understood that the floor area for a small supermarket such as the Willis Street New World is around 1500m<sup>2</sup>.

No specific activities have at this stage been identified for the site. It is however intended that there be flexibility to respond to demands from a range of future users.

However, in response to Council's request for further information, it is intended to "narrow" the extent of retail activity "permitted" on the site by the proposed new rules relating to the subject site.

A modification to the suburban centre appendix 8 rules is proposed. The modified rules are attached to the letter. Generally, it is proposed to have a limitation of total floor area for retail on each site within the Takapu Island development area.

The limitation of retail to relatively low gross floor levels, will ensure that the big box retail cannot be established on the site without the wider effects being considered under a resource consent application. The limitation on floor area will however allow mixed use activity, where some retail is associated with other activity on site, or is relatively small in total area.

A provision limiting retail on this site to 1000m<sup>2</sup> will ensure that there are no adverse effects as a result of the proposed plan change with respect to the creation of new retail areas or alternatively the creation of new "destination" retail zones in the Tawa area.

We note that the traffic report submitted with the application has already assessed the full range of activity (including retail) that could potentially be undertaken on this site. The limitation of retail by the restriction on total floor area would be consistent with the that report and the effects already taken into consideration.

## **The Development Concept**

Since the lodgement of the plan change application, the development concept for the site has been refined. It is now proposed to carry out a subdivision of the site, under resource consent, more or less in parallel with the plan change process.

Council's expressed concern that the land may be developed in an ad hoc or piecemeal manner has largely been addressed by this proposed subdivision. A detailed topographic plan has also been completed and the earthworks design plan has been refined from this accurate on site information.

It is intended to lodge the earthworks plan in the very near future for resource consent. The subdivision will follow on after the notification of the plan change. The subdivision, earthworks and landscape plans are all attached and is numbered S050484-20/A.

The attached plan is very similar to the earthworks plan in the original request, however it has been refined to the point where there is effectively a "cut to fill balance". The amount of cut is expected to be of the order of 110,000m<sup>2</sup>.

The subdivision of course, could easily accommodate residential development under the existing zoning, however it has been acknowledged that the subdivision has been designed specifically for mixed use purposes. If residential development be undertaken, it would be more appropriate for a specific residential layout to be designed. For that reason, the subdivision consent is being delayed until the plan change is notified and submissions from the general public received.

As outlined above, the final use on the site has yet to be determined, however it is likely that it will be commercial or industrial use. "Live and work" units are also being considered as a development option.

## Conclusions

In support of the information response outlined above, we provide the following attachments:

- Amended Rules for the Suburban Centre Rules – Amendments to original request highlighted yellow.
- Amended S32 Analysis regarding changes to the rules relating to retail activity.
- A proposed earthworks plan for the site by Spencer Holmes Ltd numbered SO5-0484-20/A
- A proposed subdivision plan for the site by Spencer Holmes Ltd numbered SO5-0484-21/A
- A proposed landscape concept plan for the subdivision and earthworks by Isthmus Landscape Architects EO-01.

The provision of these amendments will now we understand, allow Council to proceed with the public notification of the plan change proposal. The site owners would greatly appreciate Council's most expedient action.

Yours faithfully  
Spencer Holmes Limited

Ian Leary  
Associate - Planning

Enc

CC: Takapu Island Developments Ltd



Johnsonville Porirua Motorway

TAKAPU ROAD

SEC 1  
SO 23462  
CT W936481

Willowbank Rd

North Island Main Trunk

| CUT AND FILL TABLE |                       |
|--------------------|-----------------------|
| TOTAL CUT          | 110000 m <sup>3</sup> |
| TOTAL FILL         | 110000 m <sup>3</sup> |

| NO | REVISION    | BY | DATE     |
|----|-------------|----|----------|
| 1  | FINAL ISSUE | AK | 10/03/20 |
|    |             |    |          |
|    |             |    |          |

CONTOUR INTERVAL = 2.00m  
 LEVELS ARE IN TERMS OF MEAN SEA LEVEL  
 ORIGIN OF LEVELS: TRIG 10050  
 REDUCED LEVEL = 100.00m



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**TAKAPU ISLAND**

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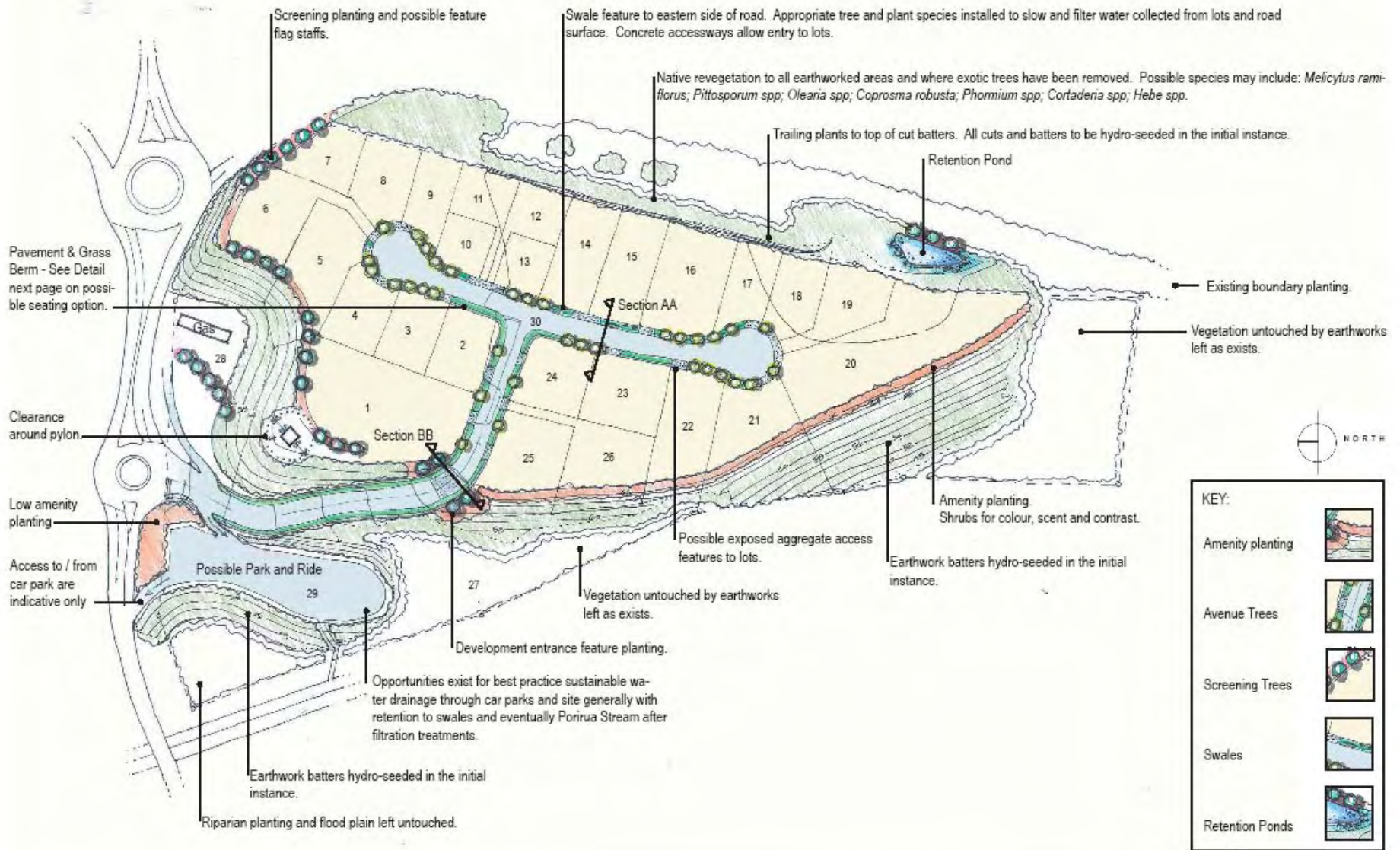
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RESOURCE MANAGEMENT - LAND PLANNING - SURVEYING - STRUCTURAL - CIVIL - FIRE





## Section 32 Analysis – Proposed Plan Change – Takapu Island.

### 1. Introduction

Section 32 of the RMA, in the case of a private plan change request, requires that the person making that request, prepare an evaluation of the relevant matters raised. Section 32(3) requires that an evaluation be made to consider:

*(a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and*

*(b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*

The Takapu Island Plan Change request seeks to implement in part, the policies developed under the Northern Growth Management Framework (NGMF), which were adopted by Council in 2003. The NGMF is fully discussed in the information provided with the plan change request, however in summary, the NGMF was an important planning process that identified the direction and form of growth within the northern Wellington area for the next 20 years.

The plan change relates to land known as Takapu Island and is site specific. The plan change proposal seeks to amend the existing residential zoning of the site to suburban centre zoning. A description of the site and its features is contained within the plan change information.

This report has been prepared to address the requirements set out in section 32 of the RMA with respect to the proposed plan change.

### 2. Context

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management includes managing the use and development of natural and physical resources to enable people to provide for *their social, economic, and cultural wellbeing and for their health and safety.*

Ultimately, the proposal to amend the district plan provision relating to this site, should be one which promotes a sustainable use of resources. In this case, the analysis to be applied is whether the alternative zoning, will ultimately be consistent with the overriding principle of the Act.

### 3. Process & Consultation

## Key documents

The key documents relevant to the plan change proposal are as follows:

- The Wellington City Council District Plan
- Northern Growth Management Framework

### ***Consultation, in accordance with the First Schedule of the RMA 1991***

The parties consulted and the matters raised are fully outlined in the information contained in the plan change information and the following parties were consulted:

- Greater Wellington Regional Council
- Wellington Tenth's Trust
- Te Runanga O Toa Rangatira Inc
- Department of Conservation
- Historic Places Trust
- Transit NZ
- Wellington City Council – Traffic Engineers
- OnTrack – New Zealand Railways Corporation
- Tawa Community Board
- Tawa Progressive & Ratepayers Association
- Glenside Progressive Association
- Friends of Tawa Bush
- Owners of properties known as 1 to 27 Willowbank Road
- Owner of 420 and 491 Middleton Road

#### **4. Appropriateness of the Change**

Wellington City District Plan - Objectives

Pursuant to section 32(3) of the Act, the first test to be applied to a proposed plan or plan change is an evaluation of:

- (a) *the extent to which each objective is the most appropriate way to achieve the purpose of the Act*

In this case, the proposal is to amend the District Plan rules that apply to this specific site.

The wider District Plan provisions themselves are not to be amended, although some site specific provisions are proposed. The objectives, policies and rules applicable are largely already contained within the District Plan.

The appropriateness of the proposed plan change is limited to consideration of whether the site is more appropriately zoned as suburban centre or residential.

Overall, the Wellington City District Plan has identified containment as one of the major outcomes that supports its overall concept of sustainable management. Along with the containment policy, the District Plan contains objectives which seek to protect and enhance the amenity of people within the city and other objectives that relate to ecological outcomes.

The containment policy has seen restrictions on development in “greenfield” areas. Greenfield development areas are the development of predominantly rurally zoned land on the edges of the city for residential or commercial land use. The District Plan has sought to promote infill development, that is development of remnant, under-utilized areas of land within the existing urban periphery.

The Council has recently undertaken two specific reviews of the containment policy. The first being the rural area reviews contained with District Plan Change 33. This plan change effectively reinforced/supported the concept of containment by further restricting rural area subdivisions and development.

The second major review of the containment policy was the Northern Growth Management Framework (NGMF). This identified that the major areas for growth in the city over the next 20 years would be largely those identified within the northern suburbs of the city. The framework has recognised that infill development within the city is limited and that over intensification of the city’s existing established urban areas, could potentially erode existing amenity values.

This site is however effectively within the existing urban periphery of the city and currently zoned residential, therefore is appropriately deemed to be an “infill” site.

The majority of the analysis of the appropriateness of the suburban centre zoning has been undertaken during the NGMF consultation and development. The site is identified as an area suitable for mixed use development. The suburban centre zoning is the most appropriate zone for mixed use developments, outside of the central area of Wellington.

The suburban centre zoning objectives to apply to the site are as follows:

- Objective 6.2.1 To promote the efficient use and development of natural and physical resources within Suburban Centre areas.*
- Objective 6.2.2 To maintain and enhance the amenity values of Suburban Centres and nearby Residential Areas.*
- Objective 6.2.3 to maintain and enhance the physical character, townscape and streetscape of Suburban Centres.*
- Objective 6.2.4 To ensure that the adverse effects of new subdivisions are avoided, remedied or mitigated.*
- Objective 6.2.5 To maintain and enhance the quality of the coastal environment within and adjoining Suburban Centres.*
- Objective 6.2.6 To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.*
- Objective 6.2.7 To prevent or mitigate any adverse effects of the storage, use, disposal, or transportation of hazardous substances, including waste disposal or transportation of hazardous substances, including waste disposal, and formation of contaminated sites*
- Objective 6.2.8 To enable efficient, convenient and safe access for people and goods within the Suburban Centres.*
- Objective 6.2.9 To promote the development of a safe and healthy city.*
- Objective 6.2.10 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.*

When making an evaluation of the appropriateness of the objectives of the District Plan, those of the suburban centre should be compared to the existing residential zone objectives currently applying to the site.

Many of the objectives of the residential zone, mirror those of the suburban centre, with the exception that the residential zone identifies the maintenance and enhancement of residential amenity as one of the primary objectives. The residential objectives, policies and rules are attached to the section 32 analysis.

However under the suburban centre zoning, the objective 6.2.2 identifies the protection of *adjoining* residential amenity as an important objective of the District Plan. With respect to objectives relating to movement of traffic, safety, hazards, health and Maori issues, there is largely a consistency between both the underlying residential and proposed suburban centre District Plan provisions.

It is also noted that the existing residential objectives seek to preserve residential amenity per se, the suburban centre zoning seeks to preserve adjoining residential amenity.

Effectively, it is concluded that in terms of outcomes sought by the objectives on the surrounding residential areas, that a rezoning from suburban centre to residential would have similar results. The objectives in terms of amenity on adjoining residential area are essentially be the same. Both the residential and suburban centre zone objectives, seek to maintain and enhance adjoining residential amenity.

The crux of the issue to be considered, are the differences in outcome, specifically on the actual site use. The existing residential objective 4.2.1 states as follows:

*To promote the efficient use and development of natural and physical resources in Residential Areas.*

Whereas objective 6.2.1 seeks to promote the efficient use and development of suburban centre areas. Therefore, the matter is simply a comparison of whether it is a more efficient and sustainable use of the site under a residential or suburban centre zone.

#### Capital Cost of Residential Development

Under the residential area provisions, the site is currently under-utilized in that there is no residential development being undertaken on it. There are several reasons why the site has not been developed for residential use. Firstly, the capital cost of forming access to the site is very high.

It is necessary to upgrade the Tawa off ramp and form the second small roundabout to gain access to the site. This work has been estimated at approximately \$1.4 to \$1.5 million. Transit NZ and the Wellington City Council are expected to make contributions to the capital cost in light of the significant contribution to wider traffic benefits of the upgrade, however, a large percentage of the cost of construction will fall on the owners and developers of the site.

There are no other practical, access options available for the site, that could be used for large scale residential access. Some light use access could be formed onto Willowbank Road, however it is generally accepted that access from Takapu Road is the best option.

In our experience, the cost of forming an allotment (excluding land purchase and holding costs) is of the order of \$50,000 per allotment. In this case, the topography of the land would restrict the developable area to the order of approximately 40-50 allotments (3-4 hectares of developable area with 500m<sup>2</sup> average lot size)

The access formation adds approximately \$35,000 to the development costs of each allotment, giving a 70% increase in the capital cost. This level of development cost, would generally make this type of development for purely residential purposes, an uneconomic prospect.

### Suitability of the Site For Residential Development

As is outlined above, not only are the capital costs to develop this site significantly greater for residential development than alternative residential sites, large parts of the site are inherently unsuitable for residential development.

The site is adjacent to both the main north island trunk line and the motorway. The northern section of the site is also traversed by high voltage power lines, as well as a gas pumping station. These physical features, detract from the potential to develop quality residential housing.

It is therefore likely, that the market return for allotments developed in the northern part of the site would be significantly reduced. As discussed above, the capital cost of developing these allotments due to the access requirements, is in the order of 70% higher than other alternative residential areas around the immediate area (as identified in the NGMF). Residential activity is most appropriately located at the southern end of the site, away from the utilities and adjacent to existing residential land. Good screening from the motorway can be achieved.

#### *Suitability of the site for Suburban Centre*

*The location of the site adjacent to the motorway and the railway line, while disadvantages under a residential zone, are significant advantages from the perspective of commercial/ retail developments. The visibility and connectivity of the sites to existing transport nodes, are advantages for the site for these types of activities.*

The commercial value of suburban centre land is greater than that of residential land and is therefore a development of this nature is able to be “absorb” the significant development costs, including the required upgrade of the Tawa Off ramp. The construction of the off ramp will have considerable wider benefits to the surrounding area which could not be practically achieved without the rezoning.

#### *Conclusion Regarding the Objectives*

Having established that the land is expensive to develop and is in part, unsuited to residential development, overall it must be conclude that the site is better suited to suburban centre zoning as opposed to a residential zoning.

In terms of the objectives of the District Plan overall, a more efficient and sustainable use of the land will be to rezone to suburban centre.

### Appropriateness of Policies, Rules and Other Methods

The second test under Section 32 is:

*whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*

The applicable suburban centre policies which flow from the objectives discussed above are as follows:

- 6.2.1.1 *Generally contain existing Suburban Centres within defined boundaries*
- 6.2.1.2 *Encourage a wide range of activities by allowing most users or activities within a Suburban Centre provided that the conditions specified in the Plan are satisfied.*
- 6.2.2.1 *Ensure that the effects of activities are managed to avoid, remedy or mitigate adverse effects on other activities within the Suburban Centres or in Nearby Residential Areas.*
- 6.2.2.2 *Require that where activities in Suburban Centres adjoin or face a Residential Area, or where Suburban Centre buildings or structures adjoin the Residential Area, they satisfy additional conditions.*
- 6.2.2.3 *Control the adverse effects of noise within Suburban Centres*
- 6.2.2.4 *Generally permit signs, but control their maximum size and placement on buildings.*
- 6.2.2.5 *Ensure that signs in Suburban Centres do not adversely effect the amenities of nearby Residential Areas.*
- 6.2.2.6 *Ensure that on streets or access routes where there are many pedestrians, verandahs are continuous*
- 6.2.3.1 *Maintain and enhance the streetscape by controlling the siting and design of structures on or over roads, and through continuing programmes of street improvements.*
- 6.2.3.4 *Maintain identified retail frontages within existing Suburban Centres*
- 6.2.4.1 *Ensure the sound design, development and appropriate servicing of all subdivisions.*
- 6.2.6.1 *Identify those hazards that pose a significant threat to Wellington, to ensure that areas of significant potential hazards are not occupied or developed for vulnerable uses or activities.*
- 6.2.6.2 *Ensure that the adverse effects of hazards on critical facilities and lifelines are avoided, remedied or mitigated.*
- 6.2.6.3 *Ensure that the adverse effects on the natural environment arising from a hazard event are avoided, remedied or mitigated.*
- 6.2.6.4 *Ensure that earthworks and buildings do not exacerbate flood hazards.*
- 6.2.7.1 *Require that the storage, use, handling and disposal of hazardous substances are subject to analysis using the Hazardous Facilities Screening Procedure and, where appropriate, the resource consent procedure in order that any potential or actual adverse effects are managed in such a way as to as to safeguard the environment.*



- 6.2.7.2 *Reduce the potential adverse effects of transporting hazardous substances.*
- 6.2.7.3 *Control the use of land for end point disposal of waste to ensure the environmentally safe disposal of solid and hazardous waste.*
- 6.2.7.4 *To require hazardous facilities to be located away from Hazardous Areas.*
- 6.2.7.5 *Co-operate with the Regional Council in compiling a database of all contaminated sites in the City*
- 6.2.7.6 *Control activities on any contaminated site.*
- 6.2.7.7 *Encourage the restoration of contaminated sites.*
- 6.2.8.1 *Seek to improve access for all people, particularly people travelling by public transport, cycle or foot and for those with mobility restrictions.*
- 6.2.8.2 *Require appropriate extensions to the existing road network, and make provision for these. In particular completion.....*
- 6.2.8.3 *Encourage the provision of appropriate parking and require servicing and site access for activities in Suburban Centres.*
- 6.2.8.4 *Manage the road system in accordance with a defined road hierarchy.*
- 6.2.8.5 *Protect and enhance access to public spaces in Suburban Centres.*
- 6.2.9.1 *Improve the design of developments to reduce the actual and potential threats to personal safety and security.*
- 6.2.9.2 *Promote and protect the health and safety of the community in development proposals.*
- 6.2.9.3 *Reduce the risk associated with the effects from high voltage transmission lines by encouraging the location of these away from urban areas and by restricting the location of Suburban Centre development near such lines.*
- 6.2.10.1 *Identify, define and protect sites and precincts of significance to tangata whenua and other Maori using methods acceptable to tangata whenua*
- 6.2.10.2 *Enable a wide range of activities that fulfil the needs and wishes of tangata whenua and other Maori, provided that the physical and environmental conditions specified in the Plan are met.*
- 6.2.10.3 *In considering resource consents, Council will take into account the principles of te Tiriti o Waitangi/the Treaty of Waitangi*

Under the Suburban Centre Zone, the methods used to achieve the identified policies include rules. We are satisfied that the Suburban Centre Objectives and Policies are appropriate for the site. The identified methods outlined in the plan, for suburban centres are generally appropriate.

In particular, the use of regulatory methods (rules) is particularly appropriate in achieving the objectives and policies of the District Plan. Additionally, the plan change does not introduce new rules or regulations that do not exist in similar form, under the District Plan. The site is currently regulated by the Residential Area rules. This proposed plan change simply imposes alternative rules to those currently in place.

We note that policy 6.2.1.1 above, looks at the issue of containing suburban centres to their existing locations. However, we note in the commentary with respect to this policy is as follows:

*Suburban Centres will also be contained to protect established residential neighbourhoods from the effects of non-residential encroachments. Future expansion of Suburban Centres is not prohibited, but extensions may be considered as a Plan Change so that a full assessment may be made of environmental effects. The establishment of new Suburban Centres also requires a Plan Change. Council is particularly concerned to ensure that any new centres are suitably located and that surrounding Residential Areas are protected.*

The District Plan therefore recognises that when suburban centre areas are envisaged to be developed, it is appropriate for this to be done by Plan Change. One of the major factors in this process, is the protection of residential amenity.

In this case, the specific site rules are introduced to require consideration of the design and external appearance of buildings, earthworks and landscaping as an appropriate mitigation to protect the residential amenity of adjoining properties. It is also an appropriate and established methodology in the District Plan.

## **5.0 Alternatives**

In considering the costs and benefits of the proposed plan change, it is relevant to consider the potential alternatives to a plan change. Any alternatives must be considered in light of the fact that the land is not generally suited to residential development and has been identified during the Northern Growth Management Framework as being suitable for mixed use development.

We can therefore exclude the “do nothing” alternative. The current undeveloped status of the land, while contributing to the “rural” amenity of local residents, is effectively under utilised and its “non use” is an inefficient use of the city’s land resource. The site cannot be effectively developed without satisfactory resolution of access issues.

The rezoning will make the access provisions outlined in the proposal a practical option. This will have a significant benefit in that it will make the roading works associated with the development more economically viable.

The only alternative to the plan change is undertaking the development of the site under the resource consent process. However, the District Plan itself states that the development of suburban centres is more appropriately considered under the plan change process.

It is also noted that the resource consent process does not give certainty to the owners or the community as to the type of development likely to be undertaken on the site. From the owners point of view, there is a significant investment in infrastructure required to complete this project and the resource consent process

contains many more uncertainties than undertaking a plan change in the first instance and developing from that point onwards. While resource consent may still be required, they will be in the context of a suburban centre zoning.

## **6.0 Summary and Conclusions**

Section 32 requires a consideration of the costs and benefits of any proposed plan change. In this circumstance, the proposal is not introducing new provisions into the District Plan. The proposal is exchanging the suburban centre for the residential area provisions. The introduction of specific site provisions to mitigate adverse effects on the local residents is appropriate.

There are significant benefits to the wider community to proceeding with the plan change. These primarily relate to roading improvements and the increase in the efficient and sustainable use of resources.

Report Prepared by

**Spencer Holmes Ltd**  
**Ian Leary – Associate – Planning**  
**Date July 2006**

## **S32 Analysis – Retail Rule**

### Section 32 Analysis – Retail Rule

A full section 32 analysis was submitted with the request for plan change. In this case, a minor change is proposed to the rules relating to the site. The change from the original consent addresses Council's concerns with respect to Big Box Retail (BBR) activity. The proposal has been amended so that the Suburban Centre Appendix 8, would require a resource consent for an proposed retail activity that exceeds 1000m<sup>2</sup> in area, within any site.

Section 32 requires an assessment of the appropriateness of proposed objectives, policies and rules. Our original s32 analysis identified the fact that the residential and suburban centre provisions that are in place or could be in place, are existing provisions of the District Plan. There are effectively no new provisions being promoted by the plan change request.

The rule changes for Appendix 8, essentially modify the wider rules and introduce site specific rules that mitigate the potential local effects.

The s32 analysis therefore primarily considered the appropriateness of applying the Suburban Centre Rules to this site, in lieu of the existing Outer Residential Provisions.

Our earlier conclusions with respect to this plan change request were that the application of the Suburban Centre Rules to this specific site was appropriate and was a sustainable and efficient use of the city's land resource.

In this case, the rule being introduced is a modification to the original request. A specific Appendix 8 rule would introduce specific requirements for this site. The modified plan change requests also now places a requirement to obtain a resource consent to undertake retail activity where that activity exceeds a total floor area of 1000m<sup>2</sup>.

In considering the requirements of s32, it is necessary to consider the appropriateness of the rule in achieving the objectives and policies of the District Plan. We have recognised that the District Plan itself is silent on retail activity and in particular, BBR activity. Any mention of BBR falls outside the District Plan itself into other documents produced by the Council. The extent to which any of these documents have been subject to public submission and consultation is unknown.

There are several options that can be considered with respect to the limitation of retail activity. The options are as follows:

- Allow no retail activity
- Restrict retail activity to a certain limit
- Make retail activity a permitted activity

In considering each of these options, it is our opinion that allowing for limited retail activity as a permitted activity, is the most appropriate.

The reason for this is that the wider community (during the NGMF consultation process) have accepted that the site is suitable for mixed use development. Mixed use development would certainly include some retail activity. Therefore in terms of encouraging a wide range of use on the site, requiring a consent for any level of retail, would at least in part, discourage retail use of

the site. It would therefore be an inappropriate method to achieve the NGMF and wider District Plan outcomes.

Council have a concern that the site should not be used for “big box retail” (BBR). There are fears that it would become a “destination” shopping area. The Council’s existing retail strategy promotes the facilitation of BBR on the CBD fringe. It makes “glancing” references to Suburban Sites but is certainly not fully “coherent” in the outcomes sought.

This site is geographically separated from the fringe CDB areas. Tawa and the more northern of the northern suburbs fall more under the influence of the Porirua BBR sites than the Wellington CBD.

The stated reasons for restricting BBR on this site is the potential to fragment existing retailing activity in the city and the potential effects of increasing vehicle movements. Yet BBR does not appear to have established in the existing retail areas in Tawa and other suburban locations. The owners of the site have experienced a high enquiry rate from potential operators, thereby indicating a high demand for this type of site within the Wellington area. This would clearly indicate that town centre locations are unsuitable for this type of activity.

The site is ideally suited as a BBR location. This however excludes for example a supermarket. The large traffic generation that results from a supermarket operation would not be able to be accommodated within the site and the proposed access arrangement.

The site is visible from and adjacent to the motorway. It is located on the edge of Tawa with good vehicle and public transport connections to the nearby areas. There are proposed new connections (under development) to the development areas of Lincolnshire Farm and other Northern Suburbs areas such as Grenada, Paparangi and Newlands. Currently, the nearest BBR sites are located in Porirua. Allowing BBR to establish on this site, would reduce the travelling distances for residents in the northern Wellington suburbs heading to the Porirua shopping sites.

It is noted however, that the site would potentially only allow for one large format operator. The floor space required for large format retailers (based on actual enquiries for the site) would be approximately 10,000m<sup>2</sup>. The parking requirements were to be approximately 200 spaces. It is noted that the rules of suburban centre zones would require consent already as a discretionary restricted activity. This use is thereby already potentially controlled (at least in terms of traffic generation) by the suburban centre rules.

This floor space demand and associated parking required would generally prohibit any additional operator establishing on this site as there is only a total useable area of 2.9 hectares. Therefore, the ability to compete with the established shopping centres and “destination” shopping areas would be limited to that of the establishment of one large format retailer. Any such effect is likely to be a very minor impact on viabilities of existing retail activity in the local and wider surrounding area.

Certainly, the strongest argument in this case for limiting retail and requiring a resource consent for any BBR activity on the site, is that it will give Council time to properly look at the issue and determine the future policy in a clearer way.

The current suburban centre rules would make retail activity in itself, on a suburban centre site, a permitted activity. The proposed rule changes for this site would see a limit on retail of 1000m<sup>2</sup> for any single site. The 1000m<sup>2</sup> would apply to each of the subdivided allotments in future.

It is however very relevant to note that the layout proposed for the site as shown on Spencer Holmes Plan SO5-0484-21/A would not necessarily suit a retail “destination” site. The parking in the site generally, is limited and this in itself would restrict the way retail outlets could operate. The sites are smaller than generally required for most, if not all BBR operators.

Overall, therefore, the proposed changes to the rule are an appropriate method to address the potential adverse effects and achieve the wider objectives and policies of the District Plan.