



# 42a Riddiford Street Newtown

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Chuni Govan

Private Plan Change Application

Reference: 28423

## PART 1

## INTRODUCTION

### 1.1 WHAT IS PROPOSED PLAN CHANGE XX

The purpose of Proposed Plan Change XX is to rezone 42A Riddiford Street from its current Inner Residential Area zoning to Centres Area zoning under the Wellington City District Plan. The Proposed Plan Change also proposes to adjust the boundary of the overlay identified as “Areas Subject to Special Building Standards” so that it no longer encompasses the application site and continues to follow the boundary between the Inner Residential and Centres Area (which will follow the cadastral boundaries).

The majority of the site is zoned Inner Residential Area in the District Plan. However, the eastern portion of the site (which is an access leg) is zoned Centres Area. As such, this Proposed Plan Change is seeking to rezone the portion of the site that is zoned Inner Residential Area to the Centres Zone so that the site has a consistent zoning across its entirety.

The application site currently contains a two storey dwelling in the western portion of the property. The dwelling is vacant and is in a state of disrepair. The site has a total area of 345m<sup>2</sup> and has frontage to Riddiford Street via a 1.75m wide 30.60m long access strip. The extent of the proposed rezoning is depicted on the Cuttriss Consultants Plan 28423PC Rev-A contained in Appendix 1. Appendix 1 also contains the proposed changes required to Wellington City Council District Plan Map 6 if this plan change was to be approved by the Council.

No new District Plan provisions, e.g. objectives, policies, rules or standards, will be introduced as a result of this proposal. The only amendments required will be a change to the Wellington City Council District Plan Map 6 to reflect the new Centres Area over the entirety of 42A Riddiford Street and the adjustment to the “Areas Subject to Special Building Standards” overlay so that it no longer encompasses the application site and continues to follow the boundary between the Inner Residential Area and Centres Area.

### 1.2 REASONS FOR PROPOSED PLAN CHANGE

The application site has traditionally been used for residential purposes, with the current dwelling being on the site since the 1920’s. In recent years the residential use of the site has ceased and the dwelling has fallen into a state of disrepair. Any future residential use of the site has a number of limitations including the restricted access to the property. The applicant owns the two properties to the immediate east of the site (40 and 42 Riddiford Street), which are zoned Centres Area. The applicant is considering a variety of development options for 42A Riddiford Street. The applicant considers that the best potential future use of the site involves the property being developed in conjunction with the neighbouring properties at 40 and 42 Riddiford Street as the three parcels combined would provide a roughly rectangular shaped site. To facilitate the use of the property in a comprehensive development, the applicant is seeking to rezone the site from its current Inner Residential Area to Centres Area. The proposed Centres Area zoning would result in

the site having the same zoning as 40 and 42 Riddiford Street to the east, thereby ensuring greater flexibility in the future development options of the site.

## PART 2

# SECTION 32 EVALUATION

## 1. INTRODUCTION

Section 32 of the Resource Management Act 1991 requires an evaluation of the Proposed Plan Change, and the preparation of a report outlining the basis and outcome of the evaluation. Section 32 of the Resource Management Act 1991 states:

*An evaluation report must—*

- (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
- (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
  - (i) *identifying other reasonably practicable options for achieving the objectives; and*
  - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
  - (iii) *summarising the reasons for deciding on the provisions; and*
- (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

*The assessment contained in the report must—*

- (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
  - (i) *economic growth that are anticipated to be provided or reduced; and*
  - (ii) *employment that are anticipated to be provided or reduced; and*
- (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
- (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

This document is the evaluation report that is required under s.32 of the Resource Management Act 1991. This report explores and identifies the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the proposed Plan Change.

## 2. DESCRIPTION OF THE SITE

### Physical Description

The application site is a 345m<sup>2</sup> property situated at 42A Riddiford Street, Newtown (Appendix 1 identifies the location of the subject property). The site is located to the rear of 40 and 42 Riddiford Street. Access to the property is via a 1.75m wide 30.60m long access leg along its southern boundary. This access leg is only wide enough to provide pedestrian access to the property. This access leg is zoned Centres Area in the District Plan.

The western portion of the property contains a derelict two storey wooden dwelling that was constructed in the 1920's. This dwelling is currently unoccupied and in a poor state of repair. The dwelling is located close to, or on its respective northern, western and southern boundaries. The site slopes up from Riddiford Street to the rear of the property. There are a series of retaining walls and earth worked benches bisecting the site. The height difference between the front (eastern) boundary of the property on Riddiford Street and the rear (western) boundary is approximately 10m. The remaining portion of the site that is not covered by the dwelling is covered with overgrown grass. The majority of the site is zoned Inner Residential Area.

The northern, southern, and eastern western boundaries of the site are largely delineated by neighbouring buildings and/or walls. The rear boundary of the site is delineated by a 1.5m bank.

The character of the surrounding area is a mix of residential and commercial development with a diverse range of architectural styles and ages. The properties to the south and west that front on to Adelaide Road and Nikau Street are zoned Inner Residential Area. These properties typically contain a residential building between one and two stories in height.

The properties situated to the north and south that front onto Riddiford Street are zoned Centres Area. To the north of the site is Ronald McDonald House. This building is of a modern design and is approximately 14m high. Situated to the south of the site (46 Riddiford Street) is the Ascot Motor Lodge. The Ascot Motor Lodge is a modern building with corrugate iron cladding. This building is constructed up to the shared boundary with the application site. Both of these properties are zoned Centres Area.

Situated to the south east of the site (and sharing the common boundary with the access leg) is an older style wooden, two storey building that contains a dairy on the ground floor, with the first floor used for residential purposes (44 Riddiford Street). This building is also constructed up to the shared boundary with the application site. This property is in the Centres Area zone.

Situated to the immediate east of the property are two buildings which front onto Riddiford Street. One of these is a single storey wooden dwelling (42 Riddiford Street) and the other (40 Riddiford Street) is constructed in a mixture of brick and wood. The front half of the brick and wooden building is two stories while the rear is singled storied.

The application site is currently spilt zoned. The majority of the site is zoned Inner Residential Area. However, the eastern portion of the site (the access leg) is zoned Centres Area. The boundary of the “Area Subject to Special Building Standards” overlay runs along the interface between the Inner Residential and Centres Areas. This special building standard relates to the permitted height allowed in the Inner Residential Area in Newtown. The standard limits the height of buildings in the Newtown Inner Residential Area to 9 metres. It is proposed to shift the boundary of this overlay to the west of the application site so that it continues to follow the Inner Residential Area/Centres Area interface. There are no other special notations or restrictions registered within the District Plan which would affect this proposal.

### **Legal Description**

The application site is legally described as Lot 1 Deposited Plan 9703, is 345m<sup>2</sup> in area, and is held in Computer Freehold Register WN417/161 (A copy of the Computer Freehold Register is contained in Appendix 3). There are no restrictions or interests registered on the title that would affect this proposal.

## **3. HISTORICAL PLANNING REVIEW OF THE SITE**

A review has been undertaken of the previous Wellington City District Schemes and District Plans. The findings of this review can be summarised as follows:

- In the 1972 City of Wellington Operative District Scheme and the 1979 City of Wellington District Scheme Review, the site and surrounding properties were zoned Residential C2. This zoning allowed residential development up to 12 metres in height.
- In the 1984 City of Wellington Operative District Scheme, the site continued to be zoned Residential C2, allowing for residential development up to a maximum height of 10 metres.
- In 1985 the properties adjoining the site along Riddiford Street and the access leg of the subject site were rezoned under the District Scheme Change 88/13 to ‘Mixed Use H Zone’.
- Under the 2000 Operative Wellington City District Plan that part of the site that was zoned ‘C2’ became Inner Residential Area and the ‘Mixed Use H Zone’ became Suburban Centre. The boundary between the Inner Residential Area and Suburban Centre zones reflected the boundary shown in the District Scheme Change 88/13 ‘Mixed Use H Zone’. The Inner Residential Area zoning allowed for residential developments up to a height of 9 metres and the Suburban Centre zoning provided for a wide range of Permitted Activities and buildings up to a maximum height of 12m.

## **4. ENVIRONMENTAL EFFECTS**

### **Amenity effects on Inner Residential Area properties**

The Proposed Plan Change is seeking to rezone the majority of the site from Inner Residential Area to Centres Area. The current Inner Residential Area zoning provides for residential development of the site as a Permitted Activity. Residential dwellings could be constructed up to 9m in height (or 10m with a roof slope of 15 degrees or

greater that rises to a central ridge), subject to compliance with the building recession planes. The proposed dwelling could be located on the boundaries of the property and cover up to 50% of the site. The Inner Residential Area predominantly encourages residential activities on the site, with limited ability for non-residential activities to be undertaken.

The proposed Centres Area zoning would enable a variety of retail, commercial and apartment style developments to be undertaken on the application site, subject to obtaining resource consent (as all new buildings on Centres Area zoned land require resource consent). The standards associated with the Centres Area seek to ensure that development supports a variety of activities. The standards recognise that Centres Area zoning often adjoins Residential Area zoning and therefore more stringent standards apply at the interface with the Residential Area. These standards seek to achieve a balance between allowing development of properties in the Centres Area, while maintaining the amenity values of adjoining residential properties. The standards in the Centres Area used to protect residential amenity include:

- Any building or structure must comply with the applicable building recession plane standard of the Residential Area at any point along a boundary adjoining the Residential Area;
- No building or structure in the Centres Area can be higher than 3 metres within 5 metres of the Residential Area boundary;
- Lux limits for direct or indirect illumination of outdoor areas at the windows of residential buildings;
- Screening of outdoor storage and activities as well as screening of external waste storage areas;
- Windows above ground floor level located within 5m of, and facing a Residential Area shall have privacy glazing;
- Any deck, terrace or balcony with a finished floor level 1.5m above ground level shall not be closer than 5m from an adjoining Residential Area boundary; and
- Limits on fixed plant noise.

These standards limit the potential effects of shading, reduced sunlight access, building bulk and dominance, privacy and overlooking on adjoining Residential Area zoned properties. These standards ensure that any building constructed between approximately 0.5m and 5m from any adjoining Residential Area boundary would be lower under the proposed Centres Area zoning than what could be constructed under the existing Inner Residential Area zoning.

It is acknowledged that the proposed Centres Area zoning would enable a 12m high building to be constructed 5m from the boundaries of the surrounding residential properties, an increase of 3m (or 2m depending on roof pitch) when compared to the existing zoning of the site. The application site is lower than the surrounding Residential Area zoned properties by approximately 1.5m along the western boundary and 3m along the southern boundary. This means that any effects in terms of building dominance or shading on the neighbouring properties arising from additional height are reduced. It is also considered that the increased overall height allowed for under the Centres Area zoning, and the effects on the neighbouring residential properties, is offset by the

requirement for buildings to be lower in height for the first 5m from any Residential Area properties, when compared to the existing zoning. Building bulk and location drawings showing indicative buildings that could be constructed on the site under the current and proposed zoning are included in Appendix 4.

The existing Centres Area provisions also ensure that any future building on the application site would require resource consent as a Restricted Discretionary Activity. As part of the assessment of any future resource consent is the requirement for future buildings to meet the outcomes of the Design Guide for Newtown. The design guide will ensure that any future building on the site will be designed in a manner that is sympathetic to the local environment, including the neighbouring Residential Area properties. The requirement for a resource consent for any future building provides a significant safety net in ensuring that any development of the site is undertaken in a manner that maintains the amenity of the adjoining Residential Area properties to an acceptable standard. It is considered that the protection afforded in the District Plan under the Centres Area rules is appropriate for the site and as such the applicant is not seeking to amend or add to these provisions as part of this Proposed Plan Change.

The standards for the Centres Area in the District Plan have been created to ensure the amenity values of Residential Area properties are maintained along the boundary with the Centres Area and the site will be subject to these standards on rezoning. These standards will avoid, remedy or mitigate any potential effects on the amenity values of the surrounding Residential Area properties from any potential future development of the site. It is therefore considered that the effects on the amenity of the surrounding properties will be less than minor as a result of the Plan Change.

#### **Amenity effects on Centres Area properties**

This assessment will consider the potential amenity effects arising from the proposed Plan Change on the adjoining properties that are already in the Centres Area Zone. The proposed Centres Area Zone would allow for future buildings on the site to be higher, be constructed up to respective boundaries and have greater site coverage, when compared to the existing zoning. The adjoining properties zoned Centres Area contain a number of activities including:

- Ronald McDonald House (30-38 Riddiford Street);
- a residential dwelling (42 Riddiford Street);
- a vacant building (40 Riddiford Street);
- Ascot Motor Lodge (46 Riddiford Street); and
- a dairy with a dwelling on its second floor (44 Riddiford Street).

Given the predominantly non-residential, but noise sensitive nature of these activities, the amenity values held by these properties may be similar to those in the neighbouring Inner Residential Area. They may also have an underlying expectation of what activities are likely to occur on the site given its Inner Residential Area zoning.

The neighbouring properties in the Centres Area Zone have open areas adjacent to, and windows overlooking, the site. While the application site is currently overgrown and the

dwelling has little visual appeal, it does provide an open area for the surrounding properties to overlook. However, it is considered that the windows of the surrounding Centres Area properties are far enough away from the site boundary that there will still be sufficient distance between the windows and any future buildings on the site. Also many of the windows on the neighbouring buildings do not face directly towards the site, which means that the effects from future development on the site are reduced

It is considered that the extra building bulk of between 2m and 3m of height permitted under the Centres Area standards when compared to the existing zoning is acceptable given the site is located in a highly built up urban area where people have an expectation they will see large buildings and structures on neighbouring properties. The effects of shading and reduced sunlight access on the open space at the rear of Ronald McDonald House will be minimal given the subject site is on the southern side of this property. It is therefore considered that any effects on the amenity of the surrounding Centres Area properties will be less than minor.

The Proposed Plan Change also has a number of positive benefits for the adjoining properties that are in the Centres Area Zone, the most notable being that they will adjoin one less Residential Area property. This means that the maximum height, building height recession plane restrictions and the other limitations that apply under the Centres Area rules where sites adjoin properties zoned Residential Area, will no longer apply to 38, 40, 42 or 46 Riddiford Street. This in turn means that the possible development potential of the neighbouring properties zoned Centres Area will increase as a result of this proposal.

### **Character Effects**

The properties that adjoin the site and also front onto Riddiford Street are zoned Centres Area, whereas the properties that front onto Adelaide Road and Nikau Street are zoned Inner Residential Area. The application site is small in size and the proposal would result in a nominal change in the boundary between the Inner Residential Area and Centres Area zones. Due to the topography of the site, the property naturally appears to be more connected with Riddiford Street as opposed to the residentially zoned properties in Adelaide Road or Nikau Street.

The Inner Residential Zone has been identified due to its close proximity to Wellington's city centres. There are a large number of properties zoned Inner Residential Area that share a boundary with a property zoned Centres Area. It is considered that there is an expectation for occupants of properties zoned Inner Residential Area (particularly those situated close to the interface with the Centres Area) that commercial buildings will be visible when viewed from their site. The Residential Area properties that adjoin the subject site already have views of the backs of a number of buildings located on Centres Area zoned properties that front on to Riddiford Street and of the Hospital buildings located across Riddiford Road. The proposed rezoning would mean that any additional building bulk could potentially be located closer to their boundary. However, given the existing outlook from the site, and the potential outlook from these sites if 40 and 42 Riddiford Street were developed to their full potential height, the potential for additional building bulk to be located closer to these Residential Area properties does not



constitute a significant change in the character of the local environment and would not significantly decrease available views towards the east.

Most of the properties along Riddiford Street in the vicinity in the site, which are visible and accessed from Riddiford Street, are occupied by non-residential and/or commercial activities. This site remains one of the few properties which still contains a residential dwelling. Any development of the site is therefore be considered to be more in keeping with the character of Riddiford Street than the current situation.

Under Rule 7.1.4 of the District Plan, the construction or alteration of any building which alters the external appearance or is visible from public spaces becomes a Discretionary (Restricted) Activity and requires a resource consent. This allows Council to refuse consent or impose conditions on any application relating to the building design, site layout, access, and landscaping. Applications will also be assessed against the Centres Design Guide and Appendix 1 of this Guide relates to Newtown. The intention of the Centres Design Guide is to achieve high quality buildings and spaces by setting design objectives regarding:

- heritage values;
- visual effects;
- quality living and working environments;
- integration of environmental sustainability principles; and
- safety and access.

The effect of the Design Guide on the site is that any new building will need to be designed in such a way that it complements the local character of the existing environment.

The location and topography of the site, the requirement to consider the Centres Design Guide, and the minimal change in the zone boundary mean that the effects on the character of the surrounding area will be less than minor as a result of the Proposed Plan Change.

In conclusion, it is considered that given the factors described above, any potential amenity or character effects arising from rezoning of the property to Centres Area will be less than minor and any adverse effects resulting from any future development on the site can be appropriately addressed by the existing rules of the District Plan.

### **Noise Effects**

The permitted noise levels for the Centres Area, when measured at the boundary of the existing Inner Residential Area properties is the same as if the property was to remain zoned Inner Residential Area. As such, the Proposed Plan Change will not result in the adjoining Inner Residential Area properties being subjected to higher noise levels than when compared to the existing zoning of the site. It is therefore considered that the effects of noise on the surrounding Inner Residential Area properties as a result of the Proposed Plan Change will be less than minor.

The properties zoned Centres Area surrounding the subject site could potentially be subject to higher noise levels as a result of the proposed rezoning due to higher noise levels being allowed on the boundaries they share with the subject site. The surrounding properties zoned Centres Area already share boundaries with other sites zoned Centres Area and so are already subject to the higher noise emission levels permitted under the Centres Area zoning. While the proposed rezoning will increase the lineal length of boundary that they would share with Centres Area zoned sites, it will be a relatively small increase due to the size of the subject site in relation to the adjoining size of the adjoining properties. The subject site will share a proportionally large lineal length of its boundaries with properties zoned Inner Residential Area and activities will be required to comply with the Inner Residential Area standards relating to noise emissions along those boundaries. This will have a flow on effect for the neighbouring Centres Area properties in reducing the noise emissions experienced by them. It is therefore considered that the effects of noise on the surrounding Centres Area properties as a result of the Proposed Plan Change will be less than minor.

### **Light Spill Effects**

There are no standards for light emissions within the Inner Residential Area under the District Plan. However, there are lux limit standards for outdoor areas in the Centres Area that limit direct or indirect illumination at the windows of any residential building in any Residential Area to 10 Lux. This standard will limit any illumination from the site under the proposed rezoning to a level that is considered to be acceptable. It is therefore considered that the effects of light spill on Inner Residential Area properties as a result of the Proposed Plan Change will be less than minor.

The Centres Area is not subject to any standards that limit illumination onto other Centre Area properties. There is potential for an increase in illumination levels coming from the site due to the wider range of activities permitted under Centres Area. However, the surrounding Centres Area properties already share boundaries with the Centres Area and are therefore not subject to any standards for illumination along those boundaries. The increased length of boundaries that the surrounding properties zoned Centres Area share with the Centres Area will be relatively small in relation to their entire properties. It is therefore considered that the effects of light spill on the surrounding Centres Area properties as a result of the Proposed Plan Change will be less than minor.

### **Infrastructure Effects**

The proposed Centres Area zoning would enable a variety of retail, commercial, and residential type of developments to be undertaken on the site (subject to compliance of the District Plan standards).

A review has been undertaken by Cuttriss Consultants Limited of the services available to the site within the local environment (see Appendix 5). This report investigates whether the existing infrastructure (wastewater, stormwater, and water) is able to accommodate the increased range of activities that would be permitted on the site under the proposed Centres Area zoning. The report concludes that the foreseeable range of future development options for the site could be appropriately serviced, subject to final design.

Overall, no issues were identified with the availability and capacity of services to the site and therefore the proposed Centres Area is considered to be an appropriate zoning for the site.

### **Heritage Effects**

The demolition of any building constructed before 1930 in the Inner Residential Area of Newtown is a Discretionary (Restricted) Activity under Rule 5.3.6. Under the proposed Centres Area zoning this rule does not apply and the existing dwelling could be demolished as a permitted activity without resource consent.

If the dwelling was demolished under the existing Inner Residential Area rules, the matters that Council has restricted its discretion to are as follows:

- *5.3.6. 1 the contribution made by the existing building to the townscape character of the neighbourhood*
- *5.3.6.2 the physical condition of the existing building*
- *5.3.6.3 the design of any proposed works (including any replacement building, or additions and alterations to an existing building), and the impact of these works on the townscape character of the neighbourhood*

In considering the effects associated with being able to demolish the dwelling without the need for resource consent (as would be allowed if the site was rezoned) it is noted that, the dwelling is in a poor state of repair and is generally isolated from the Inner Residential Area. The dwelling is also well separated from Riddiford Street, as it located on a rear site, and is largely screened from Riddiford Street by the existing development on 38, 40, 42 and 44 Riddiford Street, Newtown. The main views of the existing dwelling, when viewed from Riddiford Street, is down the narrow pedestrian walkway onto the site, which significantly limits the views of the site. This screening and separation distance, means that the existing dwelling makes little contribution to the streetscape values of the local environment. It is therefore considered that there will be minimal effects on the integrity of the heritage values of the Inner Residential Area of Newtown as a result of being able to demolish the dwelling without resource consent under the proposed Centres Area.

It is also noted that the existing dwelling is not an identified heritage building as identified by Heritage New Zealand. The applicant has previously had a heritage assessment undertaken of the proposed development (Appendix 6). This heritage assessment was prepared for a different purpose than to support this plan change (the assessment looks at whether the archaeological provisions of the Historic Places Act 1993 would be triggered if the dwelling on the site was demolished (the Historic Places Act 1993 was the precursor to the current Heritage New Zealand Pouhere Taonga Act 2014). However, the findings of this assessment are relevant, in that it demonstrates that the dwelling has been highly modified throughout its life and therefore any heritage values associated with this structure are significantly reduced.

It is considered that given the above factors, there are no significant heritage effects resulting from this Proposed Plan Change. In particular, it is considered that the ability to demolish the existing dwelling as a result of the change in rules arising from the

proposed plan change will have minimal effects on the character and heritage values of the local environment.

### **Traffic Effects**

The applicant has commissioned a traffic assessment which considers the potential traffic effects associated with the proposed plan change. This traffic assessment considers the potential traffic effects resulting from the existing zoning of the site and compares it to the potential traffic effects that could result from the proposed zone. A copy of this traffic assessment is provided in Appendix 7.

The traffic assessment considers the potential traffic effects that could arise from a development being undertaken in conjunction with the existing Inner Residential Area zoning of the site and the potential traffic effects that could arise from development undertaken under the proposed Central Area zoning.

The current Inner Residential Area zoning requires a minimum of one car park per house hold unit, and more car parks are required for residential activities that create more than one house hold unit. Currently, there is no on-site car parking or vehicle access arrangements for the site, and it is not possible to obtain either of these due to the width of the access strip to the site. Whether the site is zoned Inner Residential Area or Centres Area, the existing configuration of the allotment precludes on-site parking and/or on-site loading in the case of Central Area zoning.

Activities in the Centres Area are not required to provide on-site vehicle parking, although they are required to provide an on-site loading area. If the site was to be developed on its own, the parking and access situation would be the same as under its Inner Residential Area zoning, and an on-site loading area would not be able to be provided. This would need to be taken into consideration when designing any future development and/or establishing an activity on the site. This is not considered to preclude the Proposed Plan Change from progressing due to the reality that there is already no on-site parking or loading area space available. However, if the site is developed in conjunction with 40 and 42 Riddiford Street this will offer the opportunity to undertake a comprehensive development over all three properties that will provide sufficient space for on-site parking and an on-site loading area.

The area of Riddiford Street where the site is located is part of an area of restricted road frontage identified on District Plan Map 45. This means no new vehicle access is able to be constructed as a Permitted Activity along this road frontage and it applies to both the Inner Residential Area and Centres Area zones. It is a Restricted Discretionary Activity to construct a new vehicle crossing over a restricted road frontage. Currently, the site does not have a vehicle crossing and the existing access strip is too narrow to enable the construction of a vehicle crossing to the site. This would need to be taken into account when designing any future development of the site and would potentially restrict development to activities that do not require vehicle access. This is not considered to preclude the Proposed Plan Change as there will be no change to the existing situation and it can be addressed by developing the site for an appropriate activity.

42 Riddiford Street has an existing vehicle crossing to Riddiford Street which can be utilised in a comprehensive development over the three properties of 40, 42A and 42 Riddiford Street. This will offset any increase in the need for vehicle access to the site as a result of the Plan Change, and a Discretionary (Restricted) Activity resource consent application would not be required.

The applicants Traffic Engineer has discussed the proposal with Brendon Stone, Principal Transport Planner at Wellington City Council. Mr Stone, was comfortable with the Proposed Plan Change. Mr Stone did identified several relevant matters as identified in the traffic assessment that would need to be considered in the resource consent application process. Given these matters are relatively general, and their applicability will depend on the form of development that proceeds, it is considered that these matters do not need to be imposed as specific conditions for the site. It is expected that any development on the site would require a specific traffic assessment and the matters raised by Mr Stone would be addressed as a matter of course as part of the preparation of this assessment.

The Traffic Engineer considers that the proposed rezoning of 42A Riddiford Street to Centres Area would enable the site to be development in conjunction with 40 and 42a Riddiford Street. The ability for the site to be developed in this manner would allow for a development that is consistent with the District Plan traffic and transportation requirements and the related objectives and policies for the Centres Area zoning.

Given these factors, it is considered that while there will be no on-site loading area or vehicle access for the site under the Centres Area, it is no different to the situation under the current Inner Residential Area zoning of the site, and the effects of this will be managed by developing the site for an appropriate activity. Vehicle access and on-site loading requirements as a result of the Proposed Plan Change will be offset by developing the site in conjunction with 40 and 42 Riddiford Street. It is therefore considered that any adverse access and on-site loading area effects will be less than minor as a result of the Proposed Plan Change.

Given the above factors, it is considered that any potential traffic effects associated with the proposed Plan Change are no more than minor.

### **Economic Effects**

Currently, the site is zoned for residential activities with limited scope for home occupations and non-residential activities. The Proposed Plan Change will enable a wider variety of activities to be undertaken on the site. The economic effects of this increase in the variety of activities and the reduction of residential land within existing urban limits needs to be considered. An economic overview of the Proposed Plan Change has been undertaken for this purpose and is included in Appendix 8. The report outlines the economic changes that that will occur as a result of the Proposed Plan Change. The report concludes that the Proposed Plan Change is highly likely to provide net benefits to the social and economic wellbeing of the Newtown community, without disempowering the community or jeopardising any other Centres in the wider Centres network. As such, it is considered that from an economic perspective, any resulting effects will be positive.

## 5. POLICY ANALYSIS

### 5.1 Resource Management Act 1991

Part II of the Resource Management Act (1991) outlines the purposes and principles of the Act. An assessment of the Proposed Plan Change against Part II of the Act is as follows:

#### **Section 5**

Section 5 seeks to promote the sustainable management of natural and physical resources. Section 5 states:

*“Sustainable Management means managing the use, development 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 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.”*

The proposed Centres Area zoning for the site would be consistent with the zoning of a number of properties that adjoin the application site. The proposed rezoning would increase the development potential of the subject site, and would also increase the development potential and provide greater flexibility to the development options for 40 and 42 Riddiford Street located to the east of the subject site. The development flexibility that this proposal provides helps to provide for the economic well-being of the local community.

The application site is located close to a number of public transport options, shops, and the Wellington Hospital. It is therefore considered that further intensification of the site through the proposed rezoning is appropriate as it promotes greater utilization of existing resources.

The proposed Centres Area zoning would increase the range of activities that could be undertaken on the site, when compared to the existing Inner Residential Area zoning. However, the Centres Area is often located on the interface with the Inner Residential Area and there are a number of rules in the District Plan which ensure that development on properties zoned Centres Area does not significantly detract from the amenity values of the neighbouring properties. The change to the zoning of the site to Centres Area would not preclude residential activities being undertaken on the site, and therefore there will not necessarily be a reduction in the availability of land for residential purposes in the existing urban area. It is considered that the existing District Plan objectives, policies and rules set out for Centres Areas will ensure that any future development that is undertaken on the site takes into consideration the amenity values of the local environment, while mitigating any adverse effects on the environment.

It is considered that the potential traffic generation which would arise from a maximum credible permitted development resulting from this Proposed Plan Change would be able to be accommodated on the local roading network without compromising the traffic safety or efficiency of the existing roading network.

Given the above factors, the Proposed Plan Change is considered to be consistent with Section 5 of the Resource Management Act 1991.

### **Section 6 – Matters of National Importance**

Section 6 of the Resource Management Act sets out the matters of national importance which are required to be taken into account. The proposal is considered to be consistent with Section 6 of the Resource Management Act 1991 for the following reasons:

- The site is not situated within or near any significant landforms or features as identified in the Wellington City District Plan;
- The dwelling on the site is not an identified heritage building as identified by Heritage New Zealand. The heritage assessment enclosed with this application, in addition to its poor state of repair, ensure that any heritage values associated with this structure are minimal. Given the dwellings poor state of repair, and its screening from Riddiford Street, the ability to demolish the dwelling as a permitted activity under the proposed Centres Area zoning is not considered to detract from the heritage values of the local environment;
- There is no significant vegetation located on the site which could be considered to be ecologically significant;
- The site does not contain a wetland, lake or river, and it is not on the margin of any of these; and
- The site is not situated within the coastal environment.

### **Section 7 – Other Matters**

Section 7 of the Resource Management Act identifies the other matters that are required to be taken into account when assessing this application. Particular regard must be had to the maintenance and the enhancement of amenity values. Amenity is discussed in more detail under Section 4 of this assessment. It is for these reasons detailed in Section 4 that the proposal is consistent with section 7 of the Act.

### **Section 8 - Treaty of Waitangi**

Section 8 of the Resource Management Act requires that applications take into account the principles of the Treaty of Waitangi.

The principles of the Treaty of Waitangi have been taken into account in the analysis of this Plan Change. The site is not situated within or near any sites or areas which are identified in the District Plan as being significant to Maori. Consultation has been carried out with the local iwi authorities as part of the statutory consultation during the formation of the Plan Change and they have raised no concerns regarding this proposal.

## 6.2 Wellington Regional Policy Statement

The Regional Policy Statement (RPS) for the Wellington Region sets out the regional perspective for managing the environment, and providing for growth and its effects.

The RPS identifies the significant resource management issues for the region and outlines the policies and methods required to achieve the integrated sustainable management of the region's natural and physical resources.

The Historic Heritage and the Regional form, design and function sections of the RPS are considered to be most relevant to the Proposed Plan Change. In particular, the most relevant objectives and policies of the RPS are considered to be as follows:

### Section 3.5 Historic Heritage

*Objective 15: Historic heritage is identified and protected from inappropriate modification, use and development.*

*Policy 21: Identifying places, sites and areas with significant historic heritage values – district and regional plans*

### Section 3.9 Regional form, design and function

*Objective 22: A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:*

- d) Development and/or management of the Regional Focus Areas identified in the Wellington Regional Strategy;*
- (e) Urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;*
- (k) Efficiently use existing infrastructure (including transport network infrastructure).*

*Policy 31: Identifying and promoting higher density and mixed use development – district plans.*

*Policy 33: Supporting a compact, well designed and sustainable regional form – Regional Land Transport Strategy.*

*Policy 54: Achieving the region's urban design principles – consideration.*

*Policy 55: Maintaining a compact, well designed and sustainable regional form – consideration.*

*Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration.*



*Policy 67: Maintaining and enhancing a compact, well designed and sustainable regional form – non-regulatory.*

It is considered that the Plan Change is consistent with the objectives and policies of the Regional Policy Statement.

Section 3.5 Historic Heritage seeks to protect heritage sites from inappropriate modification and destruction. The dwelling situated on the site was originally constructed in the 1920's. This dwelling is not an identified heritage structure as identified by Heritage New Zealand. The dwelling is in a poor state of repair and the heritage assessment of the dwelling submitted with this applications confirms that this structure has been modified significantly, which reduced its heritage value. Furthermore, the dwelling is in a poor state of repair and due to its location it is not visually prominent when viewed from the local environment. On these basis it is concluded that the dwelling is not identified as having significant historic heritage values.

Section 3.9 of the Regional Policy Statements seeks to ensure that urban development is undertaken within existing urban centres in a manner which is an efficient use of the existing infrastructure and reinforces the region's existing form. The proposal site is located within an urban environment and is well serviced by existing infrastructure. Riddiford Street, which gives access to the site, is a wide multi-lane road that has the capacity to absorb any increase in traffic resulting from the rezoning in a safe and efficient manner. The rezoning of the site would promote a range of development options on a site that is located close to a commercial centre, and is also well serviced by public transport. The Proposed Plan Change will allow for a higher density and mixed use development, while at the same time being consistent with the amenity values and character of the surrounding environment (this is reinforced through the need for any new building to require resource consent, which will be assessed against the relevant Design Guide of the District Plan). The wide range of activities permitted and the ability for the site to be developed in conjunction with 40 and 42 Riddiford Street will be an efficient use of the land resource. Given these factors, the Plan Change is considered to be consistent with Objective 22 and the supporting policies of the Regional Policy Statement.

### **6.3 Wellington Regional Strategy**

The Wellington Regional Strategy (WRS) is a sustainable growth strategy that has been developed by the nine local authorities within the Greater Wellington Area, in conjunction with central government, and the region's business, education, research, and voluntary sector interests.

The aim of the WRS is to build a resilient, diverse economy which is one that retains and creates jobs (especially high value jobs), supports the growth of high value companies and improves the region's position in relation to national GDP and national employment.

The proposal is considered to be consistent with the WRS. The Proposed Plan Change would allow for the development of the application site in a manner that would support

employment and economic growth. This is due to the Centre Area rules encouraging a greater range of activities, when compared to the existing Inner Residential Area zoning. It is therefore considered that the Proposed Plan Change is consistent with the outcomes sought within the WRS.

#### **6.4 Urban Development Strategy 2006**

The Wellington City Council Urban Development Strategy 2006 is an urban growth strategy that has been developed to address the probable urban development scenarios for Wellington over the next 30 to 50 years.

The purpose of the Urban Development Strategy is to ensure that future growth and change reinforces the physical and spatial characteristics that make Wellington so distinctive, and contribute to the stimulating and intense urban experience it offers.

The proposal is considered to be consistent with the Urban Development Strategy as it is situated in an area of Wellington that is already well-connected, offers high levels of amenity, and has all of the supporting infrastructure. The Proposed Plan Change will contribute to economic growth and prosperity of Wellington and at the same time will maximise the compactness of the City. The Proposed Plan Change will focus and encourage growth along the Growth Spine as identified in the Urban Development Strategy.

#### **6.5 Other Strategies and Plans**

The Wellington City Council has a number of strategies and plans that detail the priorities for the City, namely:

- Economic Development Strategy 2011
- Environmental Strategy 2006
- Wellington Heritage Policy 2010
- Wellington Towards 2040: Smart Capital
- Long Term Plan 2012-22

The Proposed Plan Change is considered to be consistent with the outcomes sought under the above strategies and plans.

#### **6.6 Wellington City District Plan**

The Proposal Plan Change is considered to be consistent with the relevant objectives and policies set out in relation to the Centres Area of the Wellington City District Plan. The objectives and policies of the Centres Area zoning which are considered to be relevant to this proposal are as follows:

### **6.2.1 – Objective - Role and Function of Centres**

*To provide a network of accessible and appropriately serviced Centres throughout the City that are capable of providing goods, services and facilities to meet the day to day needs of local communities, residents and businesses, and of accommodating anticipated population growth and associated development whilst maintaining Wellington's compact urban form.*

*6.2.1.2 – Policy - Allow for the outward expansion of existing Centres when they are required to accommodate growth and where they:*

- are compatible with adjoining land uses; and*
- improve access to goods and services, reduce congestion on the road networks; and*
- are accessible by a variety of transport modes including public transport, walking and cycling; and*
- do not generate more than minor adverse effects on the roading network and the hierarchy of roads (Maps 33 and 34) from potential trip patterns, travel demand or vehicle use; and*
- make the best use of existing infrastructure.*

*6.2.1.4 – Policy - Promote the intensification of activities and buildings in and around Centres.*

The Proposed Plan Change site is located within an existing urban environment and rezoning the site will facilitate development that will support the residential, retail, service, and employment activities in the area. The rezoning represents an efficient use of the existing resources and maximizes the benefits of the already established infrastructure and resources in the area. The site is accessible to and serviced by good public transport and transport links. The expansion of the Centres Area into the Inner Residential Area as a result of the Proposed Plan Change will be minimal in size. The existing District Plan provisions for the Centres Area will ensure that the amenity and character of the adjoining properties in the Inner Residential Area are maintained. The site is ideally suited for expanding the Centres Area because of these factors and it is therefore considered consistent with the Objective under 6.2.1 Role and Function of Centres and the associated policies.

### **6.2.2 – Objective – Activities**

*To facilitate vibrant and viable Centres through enabling a wide range of appropriate activities to occur to meet the economic and social needs of the community, whilst avoiding, remedying or mitigating adverse effects.*

*6.2.2.1 - Policy - Enable and facilitate a wide mix of activities within Centres provided that character and amenity standards are maintained and adverse effects are satisfactorily avoided, remedied or mitigated.*

*6.2.2.4 - Policy - Control the adverse effects of noise within all Centres.*

*6.2.2.6 - Policy - Ensure that residential activities do not constrain the activities of established and permitted activities through reverse sensitivity to noise.*

*6.2.2.7 – Policy - Ensure that activities creating effects of lighting, dust and the discharge of any contaminants are managed to avoid, remedy or mitigate adverse effects on other activities within Centres or in nearby Residential or Open Space Areas*

The proposed rezoning to Centres Area will enable a wider variety of activities to be potentially developed on the site, including retail and local services that will deliver a range of environmental, social, and economic benefits. The character and amenity values of the surrounding Residential and Centres Areas will be maintained by the standards that are already in place in the District Plan for the Centres Area and the requirement for a resource consent in order to construct any building on the site.

The permitted noise levels for the Centres Area, when measured at the boundary of the existing Inner Residential Area properties is the same as if the property was to remain in the Inner Residential Area. As such, the Proposed Plan Change will not result in the adjoining Inner Residential Area properties being subjected to higher noise levels when compared to the existing zone of the site.

The surrounding properties zoned Centres Area already share boundaries with the Centres Area and so are already subject to the noise emission levels permitted under the Centre Area along those boundaries. While the proposed rezoning will increase the lineal length of boundary they share with the Centres Area it will be a relatively small increase in relation to the size of those properties. The site itself will also share a significant lineal length of its boundaries with Inner Residential Area zoned land and will need to comply with the Inner Residential standards relating to noise emissions along those boundaries. This will have a flow on effect for the neighbouring Centre Area properties in reducing the noise emissions potentially experienced by them.

Specific standards in the District Plan are in place to avoid, remedy, or mitigate adverse effects created from activities in the Centres Area which produce light, dust, and any contaminants. These standards will protect other surrounding properties zoned Centres or Inner Residential from any activity on the site under the proposed Centres Area zoning that may produce one of these nuisances.

### **6.2.2 – Objective – Built Development, Urban Form and Public Space**

*To ensure that activities and developments maintain and enhance the safety and amenity values of Centres and any adjoining or nearby Residential or Open Space Areas, and actively encourage characteristics, features and areas of Centres that contribute positively to the City's distinctive physical character and sense of place.*

*6.2.3.1 – Policy - Ensure that buildings, structures and spaces are designed to:*

- acknowledge, respect and reinforce the form and scale of the surrounding environment in which they are located; and*
- respect the context, setting and streetscape values of adjacent listed heritage items and Heritage Areas; and*

- *promote a strong sense of place and identity within Centres; and*
- *establish positive visual effects; and*
- *provide good quality living and working environments; and*
- *integrate environmental sustainability principles; and*
- *provide conditions of safety and accessibility, including for people with restricted mobility.*

6.2.3.6 – *Policy - Enable residential development in all Centres, where it:*

- *utilises upper floors of buildings; and*
- *maintains an active ground-floor on any primary street frontages, (except for in Neighbourhood Centres); and*
- *provides a secure and pleasant environment for the occupiers; and*
- *in the Mt Cook Centre is located above the second floor (measured from street level) on streets with frontage to Adelaide Road or John Street and located above ground floor (measured above street level) on all other primary and secondary street frontages.*

6.2.3.7 – *Policy - Enhance the quality and amenity of buildings incorporating a residential component by guiding their design to ensure current and future occupants have an adequate standard of amenity and access to daylight and an awareness of the outside environment.*

6.2.3.8 – *Policy - Ensure an appropriate transition between activities and buildings within Centres and adjoining Residential and Open Space Areas.*

6.2.3.9 – *Policy - Manage the height, bulk and location of buildings and developments so that they avoid, remedy or mitigate the adverse effects of shading, loss of daylight, privacy, scale and dominance and any other adverse effects on amenity values within Centres and on adjoining Residential and Open Space Areas.*

The character and amenity values of the surrounding Residential, Open Spaces, and Centres Areas will be maintained by the standards that are already in place within the District Plan for the Centres Area, and the requirement for a resource consent in order to construct any building on the site. The Centres Design Guide is required to be considered as part of a resource consent application for a new building and this will ensure that the design, sitting, and appearance of any new building fits within the existing environment and will not have adverse effects on the amenity values of the surrounding areas. The existing house on the site is considered to be of little heritage value and is in a poor state of repair. The dwelling is located on a rear site and is largely screened from Riddiford Street by the existing development form on the surrounding properties. Given these factors, the ability to be able to demolish the dwelling as a permitted activity under the proposed Centres Area zoning is considered to not detract from the streetscape/heritage values of the local environment.

The Centres Area allows for a variety of activities to be undertaken on the site. Any new building will require a resource consent and any adverse effects or reverse sensitivity effects due to inclusion of residential uses within the building will need to be addressed in the application. The Design Guide will also need to be considered and this will ensure that any new residential buildings will include high quality design, consideration of the outside environment, and provide residential amenity for people in the long term by considering the potential for future development on the neighbouring sites.

### **6.2.5 – Objective - Access and Transport**

*To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Centres.*

*6.2.5.8 – Policy - Require the provision of appropriate servicing and site access for activities in Centres.*

The site is located close to a commercial centre, and is also well serviced by public transport. Riddiford Street is a wide multi-lane road that has the capacity to absorb any increase in traffic resulting from the rezoning in a safe and efficient manner. The absence of on-site access and on-site loading would need to be taken into account when designing any future development of the site and it can be addressed by developing the site for an appropriate activity. Alternatively undertaking a comprehensive development with 40 and 42 Riddiford Street will allow for on-site access and on-site loading.

### **6.2.8 – Objective - Natural and Technological Hazards**

*To avoid or mitigate the adverse effects of natural and technological hazards on people, property and the environment.*

*6.2.8.5 – Policy - Ensure that buildings and structures do not exacerbate natural hazards, particularly flood events.*

The site is not located in or near any area identified in the District plan as being subject to a natural hazard. The design of any new development on the site that contains earthworks exceeding 250m<sup>3</sup> will require a resource consent and this will ensure that no hazards are created by any development works under the proposed Centres Area. The potential for exacerbating any natural hazard on the site will not be increased by the Proposed Plan Change.

### **6.2.10 – Objective - Tangata Whenua**

*To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington's tangata whenua and other Maori.*

*6.2.10.1 – Policy - Identify, define and protect sites and precincts of significance to tangata whenua and other Maori using methods acceptable to tangata whenua and other Maori.*

The site is not situated within or near any sites or areas which are identified in the District Plan as being significant to Maori. Consultation has been carried out with the local iwi

authorities as part of the statutory consultation during the formation of the Plan Change and they have raised no concerns regarding this proposal.

## 6.6 Consistency with Surrounding District Plans

Section 74(2) (c) of the Act requires Council to consider the extent to which this Proposed Plan Change needs to be consistent with the plans or proposed plans of adjacent Territorial Authorities.

The Proposed Plan Change involves a small area of land which is located well within the boundaries of the Wellington City Council. It will have no effect on the plans or proposed plans of any adjacent Territorial Authorities and will not be inconsistent with them.

## 6.7 Consultation

In August 2014, consultation was undertaken with the adjoining properties (Appendix 9 identifies the properties who were contacted as part of the consultation process). The actions which were undertaken during the consultation period included writing to the neighboring properties on two occasions, and speaking to the neighbours after they received the letters.

On 13 August 2014 an initial letter was sent to the owners and occupiers of the neighbouring properties informing them of the applicant's intention to rezone the site. This letter invited interested parties to contact us either by phone or email if they would like to discuss the development further (A copy of the letter is included in Appendix 10). Feedback was received from a number of the neighbours by phone or by writing. The key concerns raised were as follows:

- The proposal will undermine the integrity and character of the Newtown area
- Developing the site in conjunction with 42 Riddiford Street would potentially result in a development being out of scale with the neighbourhood;
- A 12 metre high building would result in reduced sun, views, and privacy; and
- Concerns were raised regarding the location of an existing fence on the site.

We also note that the Ronald McDonald House, 30-38 Riddiford Street did not oppose the Proposed Plan Change.

In response to the concerns raised by the neighboring property owners it is believed that their concerns have been adequately addressed in Section 2.4 of this report, which assesses the effects of the Proposed Plan Change. The conclusion of the various effects covered by Section 2.4 is that any adverse effects resulting from the Proposed Plan Change on the neighbouring properties will be less than minor.

Consultation has also been undertaken with the following parties:

- Greater Wellington Regional Council;
- Ministry for the Environment;
- South Wairarapa District Council;
- Porirua City Council;
- Upper Hutt City Council;
- Lower Hutt City Council; and
- Tenth Trust.

We received feedback from Porirua City Council and Lower Hutt City Council. Both of these parties had no comments to make on the Proposed Plan Change.

While we did not hear from several parties during the consultation phase of this project, we note that when the Proposed Plan Change is notified these parties will be contacted directly and would have the opportunity to lodge a submission.

## 6. EVALUATION OF OPTIONS

Section 32 (1) (b) (i) of the Resource Management Act 1991 states:

*(1) An evaluation report required under this Act must—*

- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
  - (i) identifying other reasonably practicable options for achieving the objectives;*

Four principal options have been explored as part of the preparation of the Proposed Plan Change. These options include

- Status Quo (do nothing); or
- Rezone the application site to the Centres Area with more restrictive site specific rules; or
- Rezone the application site to the Centres Area with less restrictive site specific rules; or
- Rezone the application site to the Centres Area.



The costs and benefits of these options are discussed below.

<b>Option</b>	<b>Evaluation</b>
<p>Option 1: Status Quo –</p> <p>NOT RECOMMENDED</p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Avoids the costs associated with the plan change process.</li> <li>- The site is able to be developed to support residential activities and limited non-residential activities.</li> </ul> <p>Costs:</p> <ul style="list-style-type: none"> <li>- There is a risk that the site would remain under utilised.</li> <li>- Development of the property for residential purposes could constrain the existing commercial properties and the establishment future permitted activities on the surrounding Centres Area properties through reverse sensitivity issues.</li> <li>- There would be no recognition of the site's stronger connection with the commercial area of Riddiford Street rather than the Residential Area.</li> <li>- There would be no solution for the site's poor access situation.</li> </ul>
<p>Option 2: Rezone the application site to the Centres Area with more restrictive site specific rules.</p> <p>NOT RECOMMENDED</p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Allows for a greater range of activities to be undertaken on the site.</li> <li>- Site specific rules would help to address any concerns neighboring property owners may have with the site being zoned Centres Area.</li> </ul> <p>Costs:</p> <ul style="list-style-type: none"> <li>- Site specific rules would place unnecessary restrictions on any future development of the site.</li> <li>- There is a risk that the site would remain under utilised as additional development restrictions could make development of the site uneconomic.</li> <li>- Results in a level of development which does not utilise the full development potential of the site.</li> <li>- The site does not contain any outstanding features that warrant site specific rules.</li> </ul>

<p>Option 3 Rezone the application site to the Centres Area with less restrictive site specific rules.</p> <p><b>NOT RECOMMENDED</b></p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Less restrictive rules allows for the maximum development potential of the application site to be realised, with the associated economic and employment benefits that will be associated with development of the site.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>- Less restrictive site specific rules could have greater adverse effects on the neighbouring properties.</li> <li>- The increase in development opportunity would not warrant the greater adverse effects on the neighbouring properties.</li> <li>- It may cause any development to be out of character with the surrounding environment.</li> <li>- The site does not contain any outstanding features, or is sufficiently unique, which would warrant site specific rules.</li> <li>- Having less restrictive site specific rules for this site would be inconsistent with how the District Plan addresses other sites of similar nature in the Centres Area.</li> </ul>
<p>Option 4 Rezone the application site to the Centres Area, and rely on the current rules.</p> <p><b><u>RECOMMENDED</u></b></p>	<p>Benefits:</p> <ul style="list-style-type: none"> <li>- Allows for the maximum development potential of the application site to be realised, with the associated economic and employment benefits that will be associated with development of the site.</li> <li>- Allows for a greater variety of activities to be undertaken on the site.</li> <li>- Allows for higher density development to occur within an existing commercial area.</li> <li>- There will be recognition of the site's stronger connection with the commercial centre of Riddiford Street.</li> <li>- Results in a density of development which is consistent with the surrounding Riddiford Street area.</li> <li>- There is greater certainty for neighbours around the level of development that could be undertaken on the site;</li> <li>- The existing provisions of the District Plan will ensure that any development is in keeping with the character of Newtown and will protect the amenity values of the neighbouring properties.</li> </ul> <p>Costs:</p> <ul style="list-style-type: none"> <li>- The monetary costs associated with the Plan Change process.</li> </ul>

	- A possible increased demand on Council infrastructure.
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Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified. Given the scale and significance of the proposal it is considered that quantifying costs and benefits to a degree beyond what is provided in the Economic Assessment, which is summarised in Section 4 of this report and attached in full as Appendix 8, would add significant time and cost to the s32 evaluation process. Therefore the exact quantification of the above evaluation of benefits and costs in this report was not considered beneficial or practicable.

## 7. The Risk of Acting of Not Acting

Section 32 (2) (c) of the Resource Management Act 1991 states:

- (2) *An assessment under subsection (1)(b)(ii) [assessing the efficiency and effectiveness of the provisions in achieving the objectives] must—*
- (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions*

In considering the proposal against Section 32 (2) of the Resource Management Act 1991, it is considered that Council has sufficient information to consider this Proposed Plan Change.

## 8. Conclusion

The Proposed Plan Change is seeking to rezone 42A Riddiford Street from Inner Residential Area to Centres Area.

The evaluation of the Proposed Plan Change has included an assessment of the effects on the environment resulting from rezoning the site to Centres Area. The proposed Centres Area zoning is considered to be appropriate and would be consistent with the character of the local environment and would allow for future development of the site in a manner which is in keeping with the amenity values of the local environment.

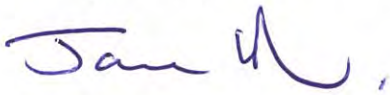
An analysis of the relevant national, regional and local policy statements, plans and other non-statutory documents has been undertaken. It is considered that the Plan Change is consistent with the national, regional and local policy statements, plans and other non-statutory documents. The objectives, policies and rules of the Centres Area are considered to adequately control any potential adverse effects resulting from the rezoning of the application site and any subsequent development. As such, no changes to the existing objectives, policies and rules for the Centres Area have been sought as part of this Proposed Plan Change.

The costs and benefits of the Plan Change have been assessed against the purpose of the Resource Management Act 1991. The costs and benefits of the options for the site have been evaluated and the recommended option to rezone the site to the Centres Area is considered to be the most appropriate in terms of achieving the purpose of the

Act. Overall, the Proposed Plan Change is considered to be consistent with the purpose and principles of the Act.

The Section 32 analysis demonstrates that the benefits of the Proposed Plan Change outweigh the potential costs and that the other potential methods would not be as beneficial as the proposed Centres Area which has been recommended.

Prepared By



James Beban

Senior Resource Management Planner

**Cuttriss Consultants Limited**

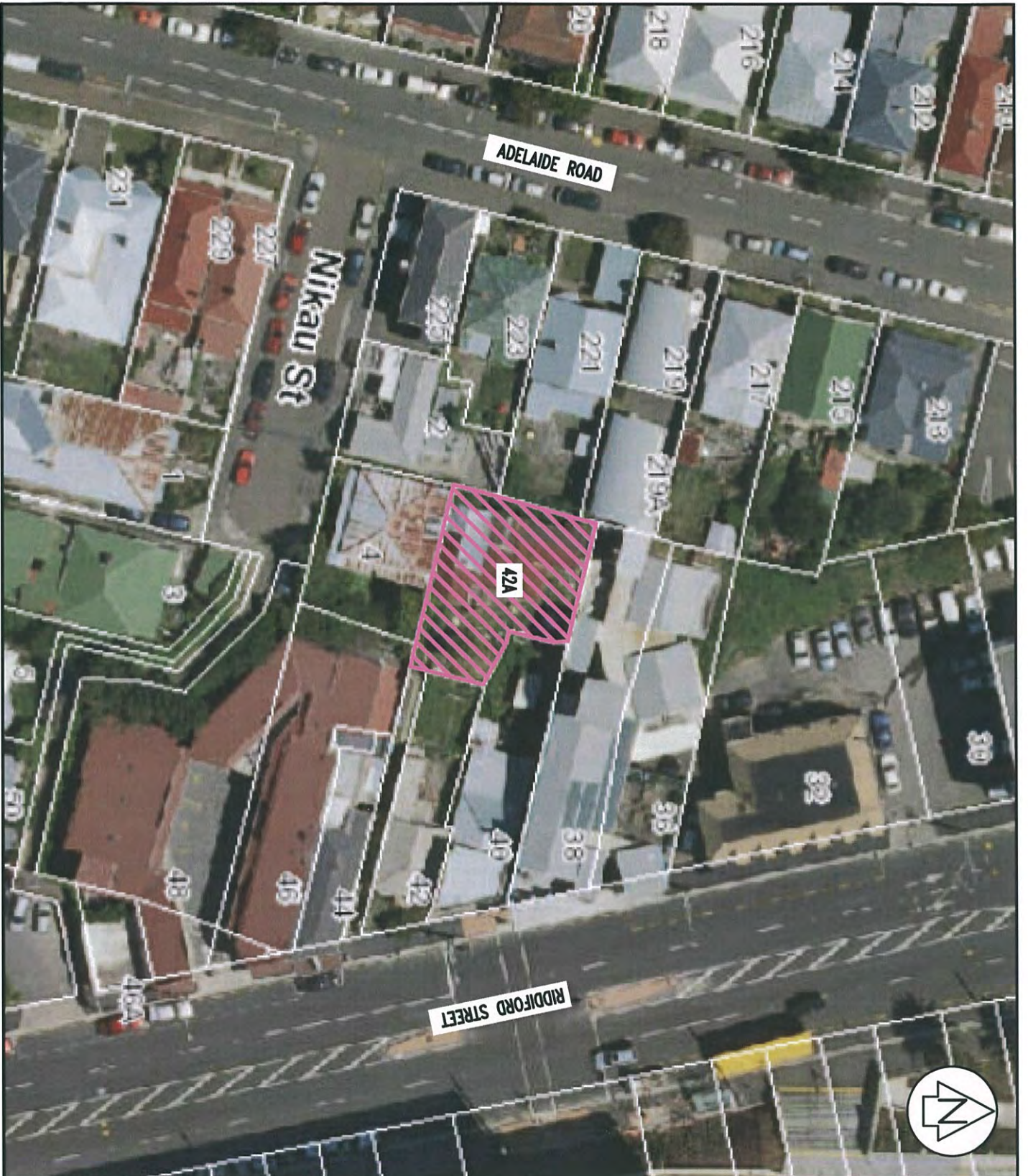
#### INDEX TO APPENDICES

1. Location Plan
2. Proposed Amendments to District Plan Map 6
3. Computer Freehold Register
4. Bulk and Location Drawings
5. Infrastructure Assessment
6. Heritage Assessment
7. Traffic and Parking Assessment
8. Economic Assessment
9. Consultation Plan
10. Consultation Letter


# APPENDIX ONE

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Location Plan



REVISION	DATE	NAME	DESCRIPTION
A	09/14	CDR	CORRECTION TO ZONE NAME

**LEGEND:**  
 EXTENT OF PROPERTY TO BE REZONED

Cuttriss Consultants Limited  
 Hunt Valley, Wellington, Kapiti Coast



- Lower Half Beach - Lot 21, Coast Road, 32 Queens Drive, Lower Hut
- Puhia Avenue - 70 Bar 20, Lower Hut, 500
- Haparaia - 145 Bar 20, Lower Hut, 500
- Haparaia - 145 Bar 20, Lower Hut, 500
- Puhia Avenue - 70 Bar 20, Lower Hut, 500
- Haparaia - 145 Bar 20, Lower Hut, 500

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**CLIENT**  
 CHUNI GOVAN

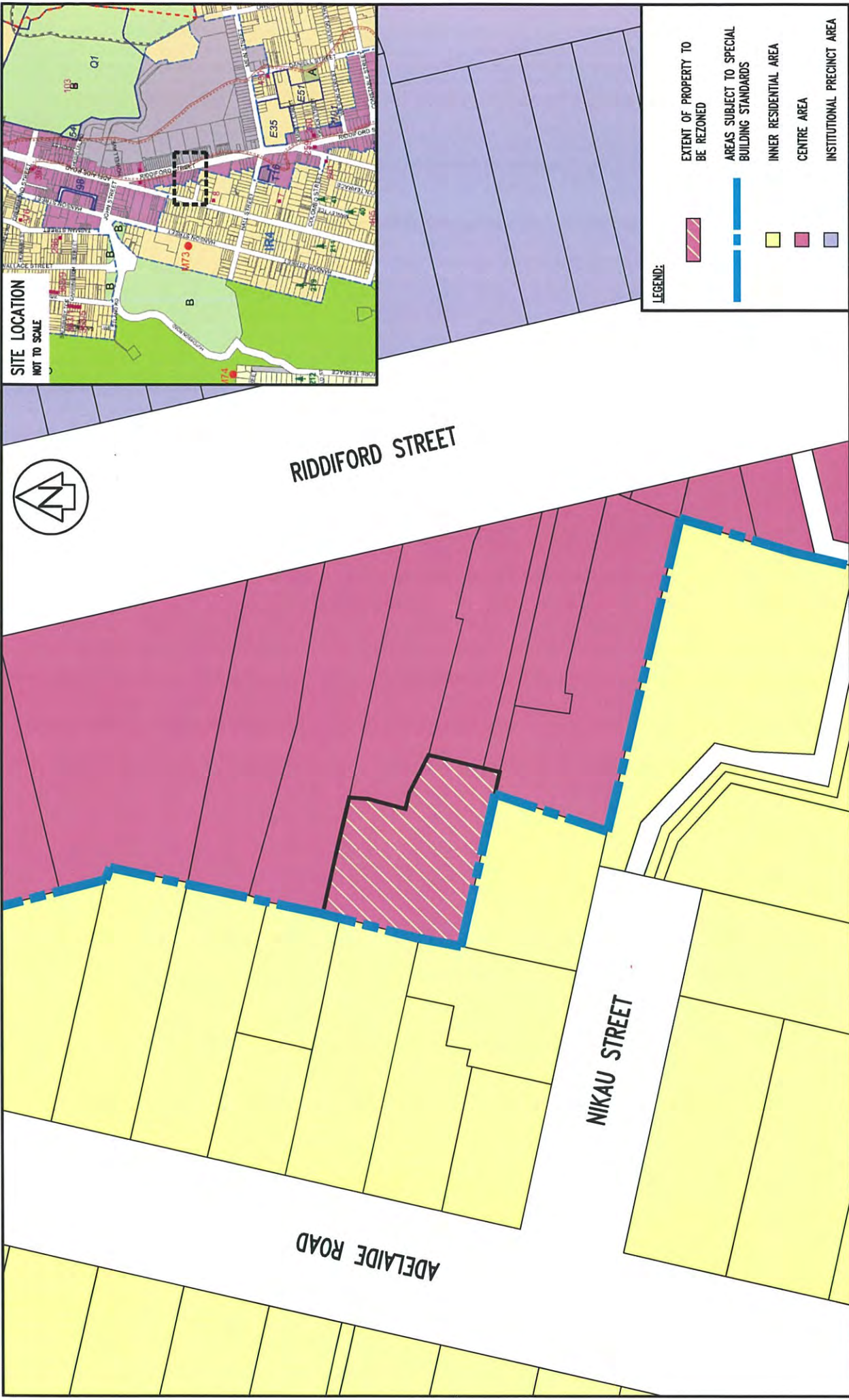
**JOB**  
 PROPOSED REZONING  
 OF LOT 1 DP 9703,  
 42A RIDDIFORD STREET, NEWTOWN  
 TO THE CENTRES AREA

<b>SCALE</b> NOT TO SCALE		<b>SIZE</b> A3	
<b>FIELDWORK</b>	NAME	DATE	<b>DRAWING NUMBER</b> 28423PC
DESIGNED	-	-	
DRAWN	DPS	08/14	SHEET 1 OF 3 SHEETS
CHECKED	CR	08/14	REVISION A

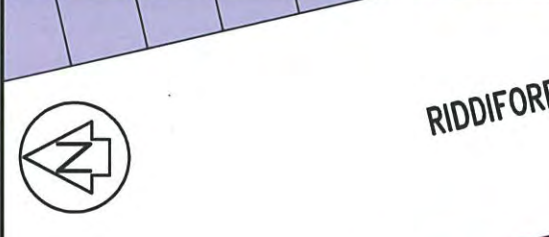
# APPENDIX TWO

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Proposed Amendments to District Plan  
Map 6



**SITE LOCATION**  
NOT TO SCALE



RIDDIFORD STREET

NIKAU STREET

ADELAIDE ROAD

**LEGEND:**

- EXTENT OF PROPERTY TO BE REZONED
- AREAS SUBJECT TO SPECIAL BUILDING STANDARDS
- INNER RESIDENTIAL AREA
- CENTRE AREA
- INSTITUTIONAL PRECINCT AREA

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SCALE NOT TO SCALE		SIZE	A3
NAME	DATE	DRAWING NUMBER	
RELWORK		28423PC	
DESIGNED		DRAWN	DPS 09/14
CHECKED		COR	09/14
		SHEET	3 of 3
		REVISION	

**PROPOSED AREA AMENDMENT TO  
WELLINGTON CITY COUNCIL  
DISTRICT PLAN MAP 6**

**CHUNI GOVAN**

CLIENT

**Cuttriss**  
Land Surveyors, Engineers & Resource Managers

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Petangamau Branch - 13 Apple Road, Petangamau  
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 Phone: (04) 528 8850 Fax: (04) 528 8851 Email: info@cuttriss.co.nz



# APPENDIX THREE

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Computer Freehold Register



**COMPUTER FREEHOLD REGISTER  
UNDER LAND TRANSFER ACT 1952**



**Search Copy**

  
R. W. Muir  
Registrar-General  
of Land

**Identifier** WN417/161  
**Land Registration District** Wellington  
**Date Issued** 22 May 1930

**Prior References**  
WN351/96

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**Estate** Fee Simple  
**Area** 345 square metres more or less  
**Legal Description** Lot 1 Deposited Plan 9703

**Proprietors**  
Chuni Govan and Jaya Govan

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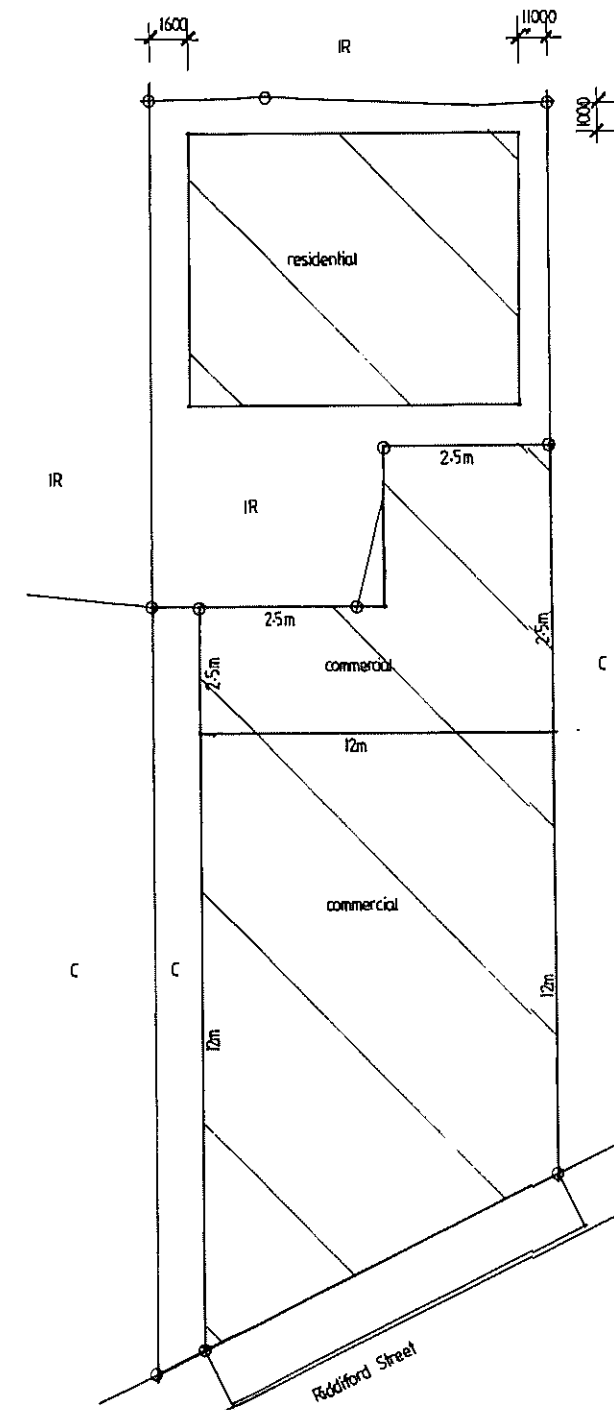
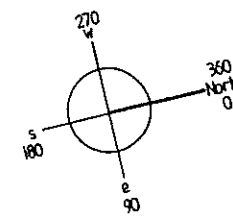
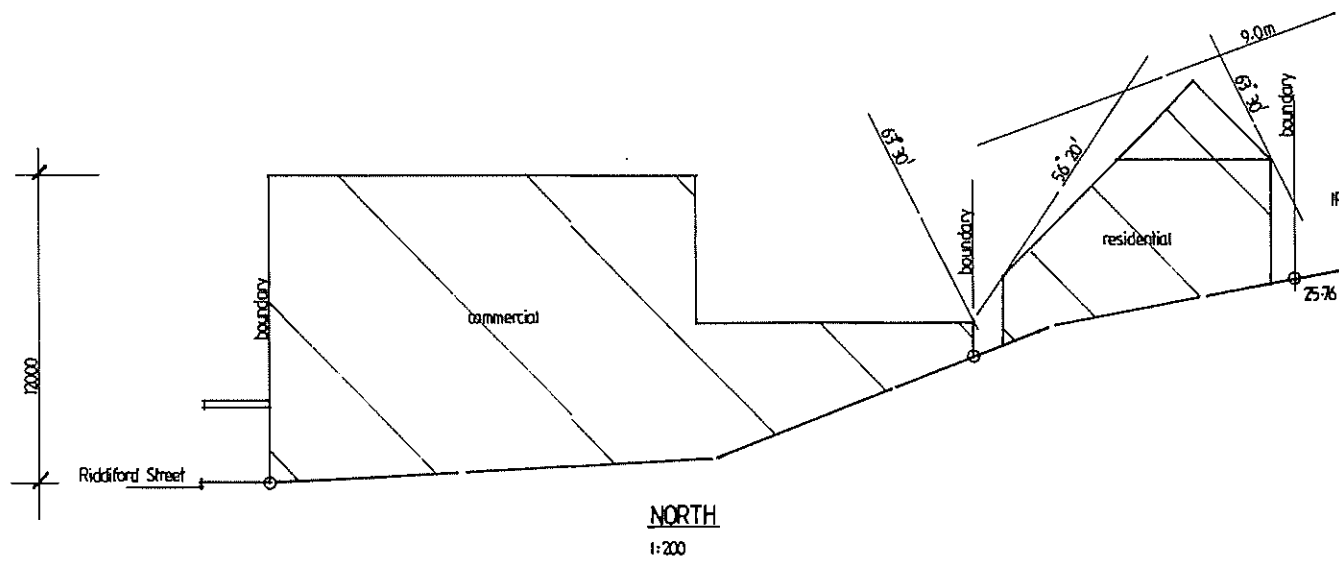
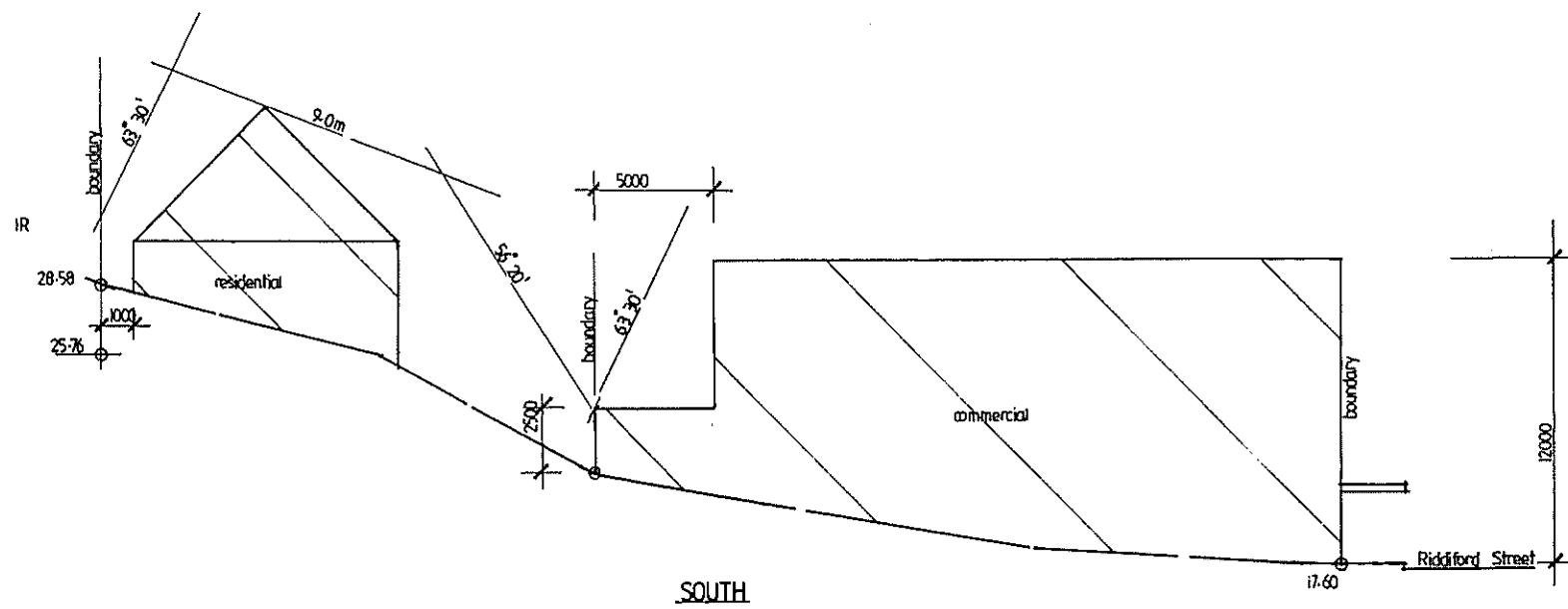
**Interests**  
B701998.6 Mortgage to The National Bank of New Zealand Limited - 14.1.1999 at 2.37 pm



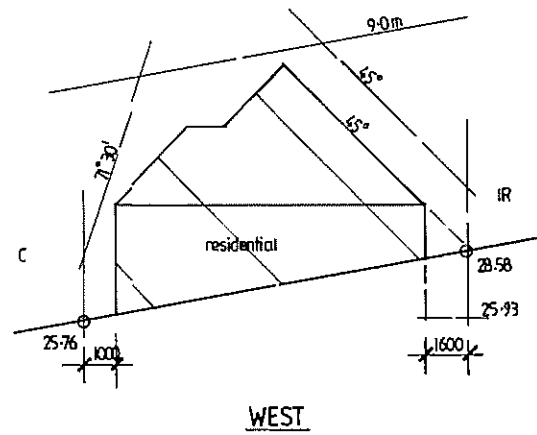
# APPENDIX FOUR

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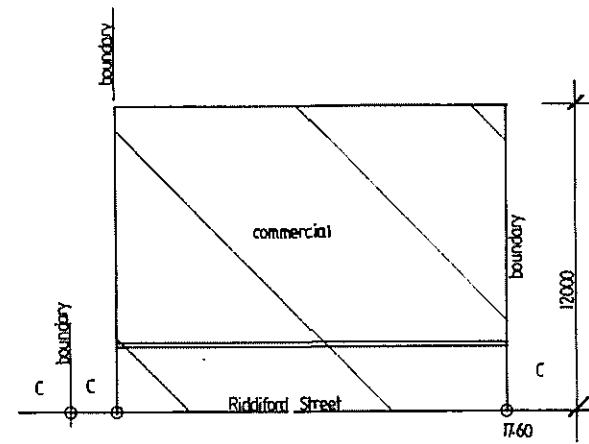
Bulk and Location Drawings



SITE PLAN  
1:200



WEST

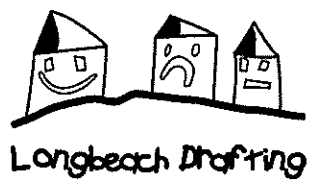


EAST

1 EXISTING ZONES

- C Centres
- IR Inner Residential

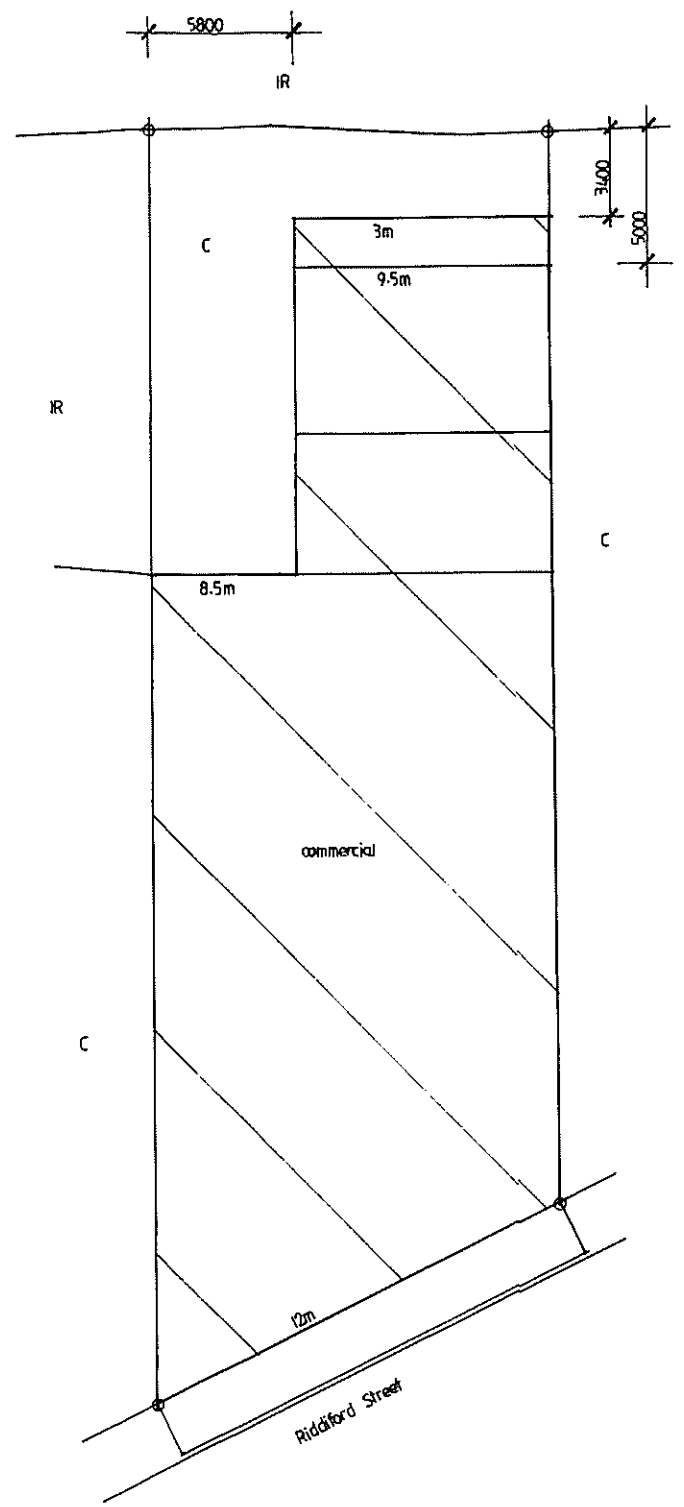
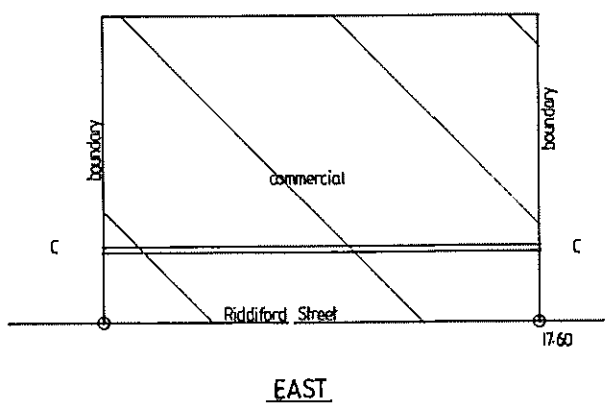
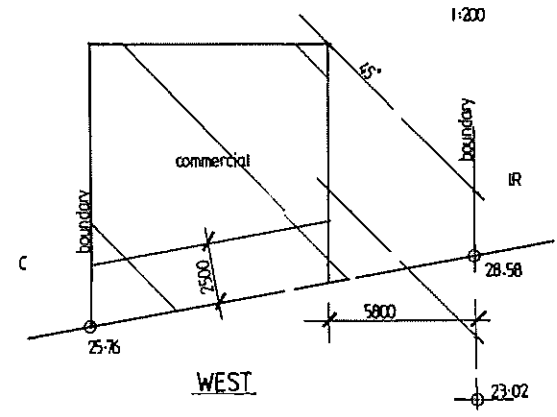
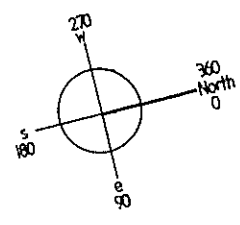
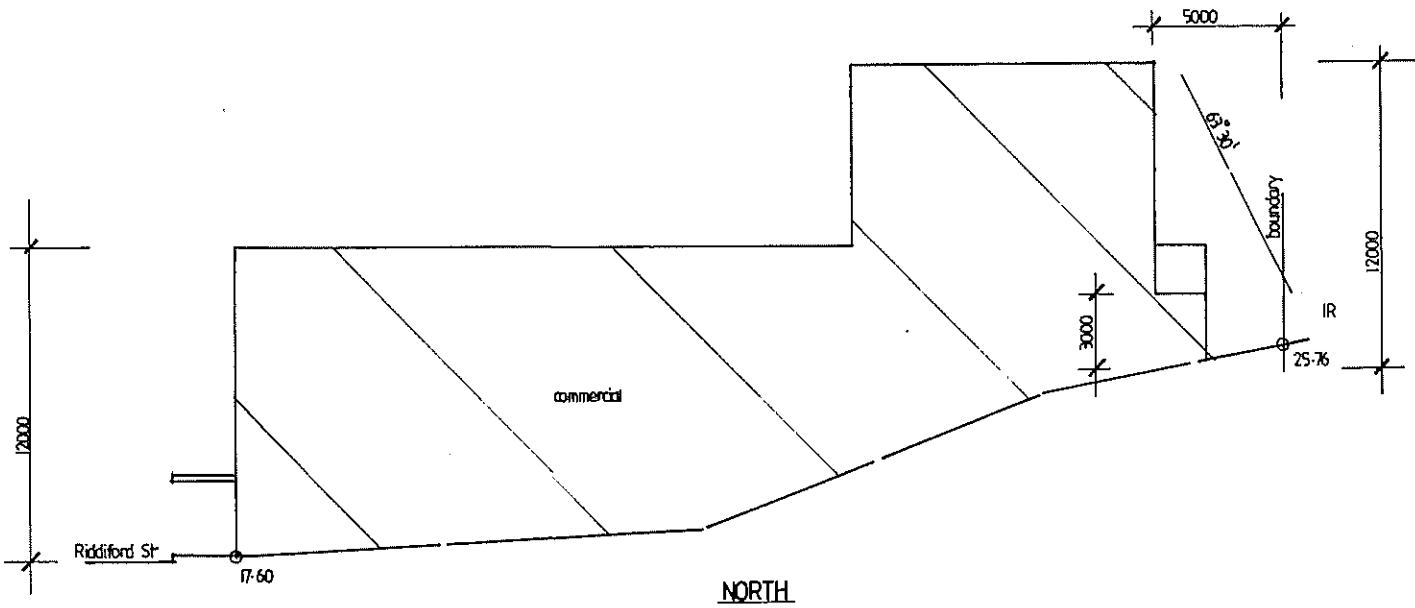
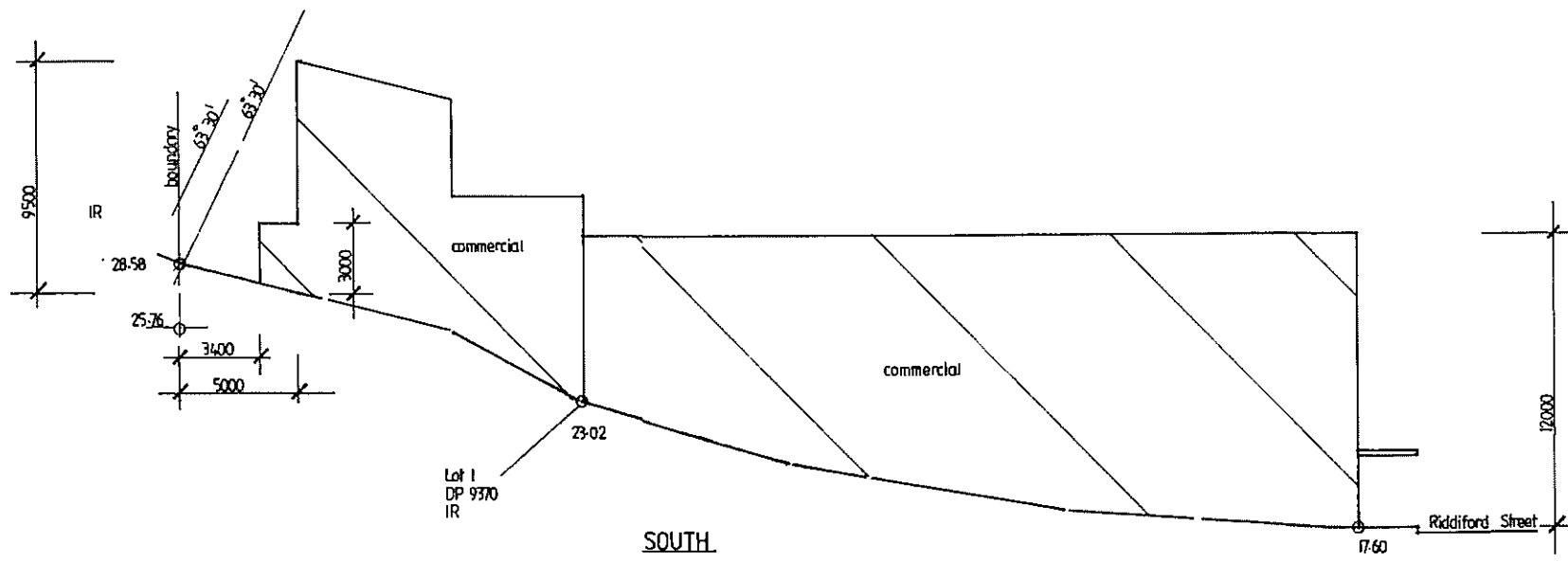
BULK & LOCATION DRAWINGS



Longbeach Drafting  
30 Rossiter Avenue, Waterloo  
Lower Hutt 5011  
ph 04 569 7194  
cell 021 249 6867  
fax 04 569 7448  
email longbeach@paradise.net.nz



Development - 40, 42, 42A Riddiford Street, Newtown	date 9/2014	revision A	drwg pl	Verify all dimensions on site Do not scale off drawings
Chuni Govan	job no. 1107			



**SITE PLAN**  
1:200



**Longbeach Drafting**

30 Rosciler Avenue, Waterloo  
Lower Hutt 5011  
ph 04 569 7194  
cell 021 249 6867  
fax 04 569 7448  
email longbeach@paradise.net.nz

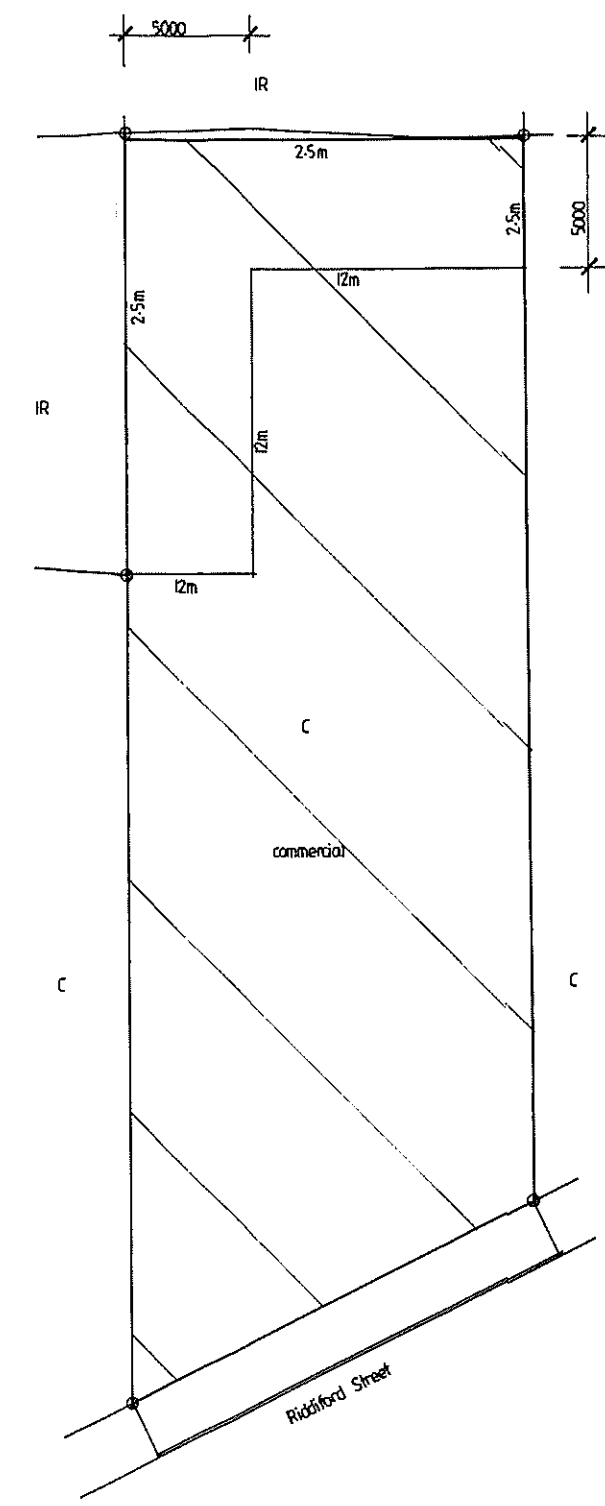
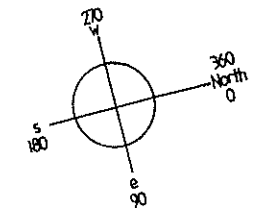
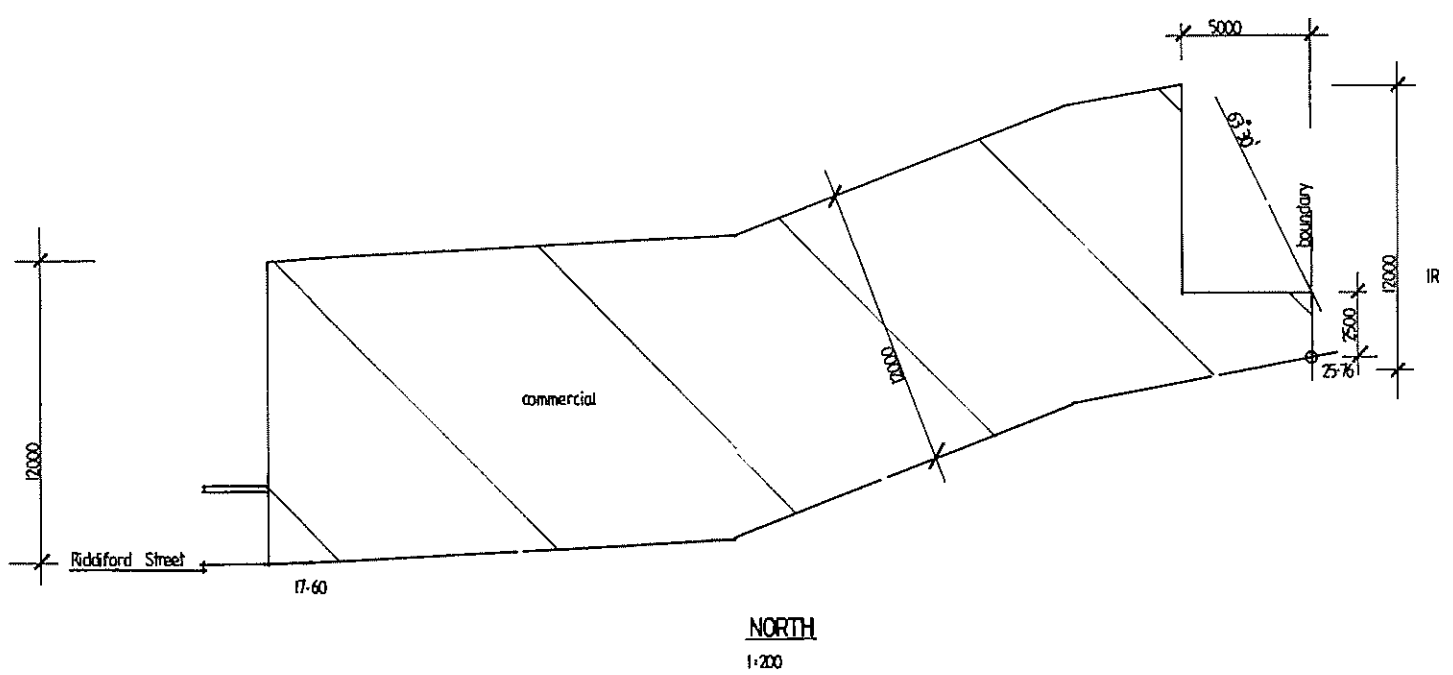
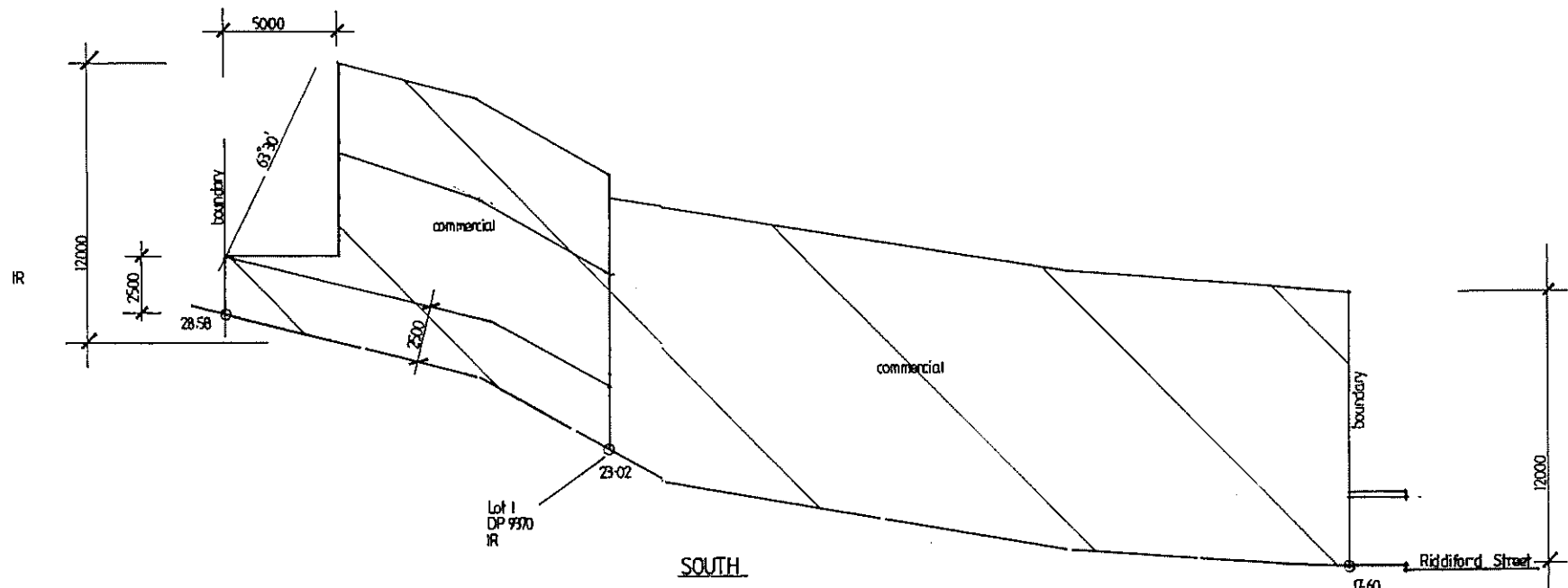


**2 PROPOSED ZONE CHANGE**

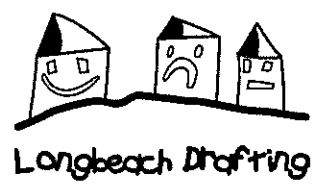
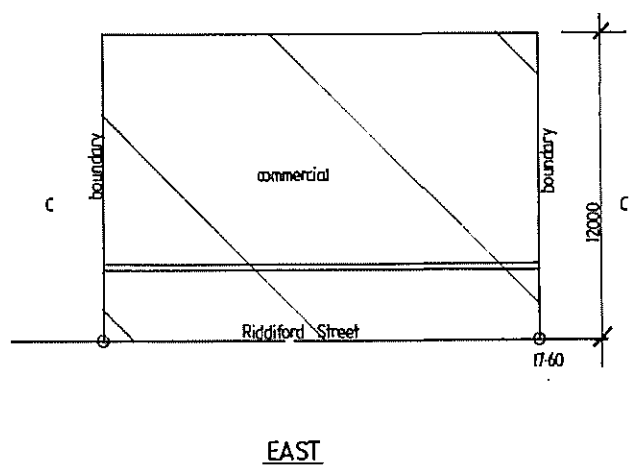
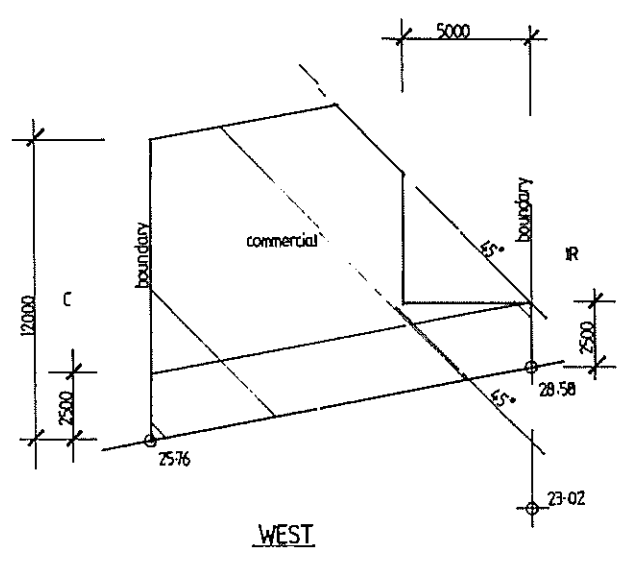
C Centres  
IR Inner Residential

**BULK & LOCATION DRAWINGS - OPTION A**

Development - 40,42,42A Riddiford Street, Newtown	date 9/2014	revision A	dwg p2	Verify all dimensions on site Do not scale off drawings
Chuni Govan	job no 1107			



SITE PLAN  
1:200



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Lower Hutt 5011  
ph 04 569 7194  
cell 021 249 6867  
fax 04 569 7448  
email longbeach@paradise.net.nz



3 PROPOSED ZONE CHANGE

- C Centres
- IR Inner Residential

BULK & LOCATION DRAWINGS - OPTION B

Development - 40, 42, 42A Riddiford Street, Newtown	date 9/2014	revision A	dwg p3	Verify all dimensions on site Do not scale off drawings
Chuni Govan	job 1107			

# APPENDIX FIVE

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Infrastructure Assessment



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ref: McMenamin/28423

17 September 2014

Also at Paraparaumu

## **ANALYSIS OF THE AVAILABILITY OF SERVICES FOR THE PROPOSED PLAN CHANGE AT 42A RIDDIFORD STREET, NEWTOWN**

### **Introduction**

This report investigates the availability of services within the local area surrounding 42A Riddiford Street, Newtown and their capacity to support the range of development which could result from the Proposed Plan Change for this site.

The intention of the Proposed Plan Change is to rezone the property from its current Inner Residential Area to the Centres Area under the Wellington City District Plan. The Centres Area will allow for a variety of retail, commercial, and apartment style developments to be undertaken on the property. At this stage there is not any specific development proposed for the site.

For the purposes of assessing whether the existing services in the area have sufficient capacity we have assumed the site will be used for a large commercial activity and entirely covered by impermeable surfaces.

The property is located within a highly urban area of Newtown and sewer, stormwater, and water services are all present in Riddiford Street directly outside the property. Currently, a house is located on the property towards the rear western boundary. The property slopes downwards from its rear boundary to Riddiford Street.

### **Wastewater**

There is an existing public wastewater pipe within the Riddiford Street carriageway that passes across the front of the site. The existing house on the site already has its own sewer lateral that is connected to this main. The main is a large diameter pipe (diameter 525mm) and drains a large catchment of houses. As a result of the Proposed Plan Change the potential increase in wastewater discharging from the site into the main would be a very small compared to the entire catchment already using the pipe. It is therefore envisioned that the wastewater main will have sufficient capacity to cater for development of the site.

### **Stormwater**

There is an existing stormwater pipe on the western side of the Riddiford Street carriageway that passes across the front of the site. This main is a large diameter pipe (diameter 900mm) and drains a large catchment area.

We have been unable to find any stormwater drainage plans for the site. However, it appears the existing house on the site discharges its stormwater run-off into pipes that go underground and likely discharge into Riddiford Street or directly into the stormwater main.

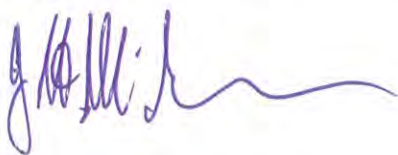
Currently, the site is covered by impermeable surfaces over 33% of its area, and 50% site coverage is permitted under the existing Inner Residential Area. Under the proposed Centres Area site coverage the impermeable surfaces could cover 100% of the site, or 345m<sup>2</sup> in total. A development covering the entire site will therefore increase the stormwater discharging from the site. This increase would make up a very small percentage of the total stormwater already discharging into the main and is unlikely to have any effect on its current performance. Alternatively, if required attenuation devices could be provided at the time of development so that the post-development flows are no more than pre-development flows from the site.

### **Water Supply**

There is an existing Council main on the western side of the Riddiford Street carriageway that passes across the front of the site. Council's water supply consultant, Capacity Infrastructure Services, has confirmed that the water main is 300mm in diameter and the nominal pressure would be approximately 70m. It is therefore considered the water main will have sufficient capacity to accommodate the potential development of the site.

### **Disclaimer**

This report investigates the availability of wastewater, stormwater, and water services for the potential development as a result of the Proposed Plan Change. This investigation is based on records available from Wellington City Council and the face value of those records. No testing of the infrastructure or catchment analysis has been undertaken. This was not considered necessary based on the location of the site, the size of the existing mains, and the size of the existing catchment in relation to the property. Although this report concludes that the existing infrastructure has sufficient capacity, it in no way removes the responsibility of any developer to undertake a full investigation as part of the design of any development to ensure that the flow and capacity of the wastewater, stormwater, and water systems are actually able to meet the requirements of any development.



Jim McMenamin  
Civil Engineer  
**Cuttriss Consultants Limited**

# APPENDIX SIX

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Heritage Assessment

**TO:** Chuni Govan  
**FROM:** Mary O’Keeffe, Heritage Solutions  
**SUBJECT:** 42A Riddiford St, Newtown Wellington  
**DATE:** 21 March 2011

---

## Introduction

Mr Govan owns the house currently located at 42A Riddiford St, Newtown, which he proposes to demolish. At this stage he advises he has no specific plans for redevelopment of the site. In discussion with WCC he was advised that the potential age of the house may trigger the archaeological provisions of the Historic Places Act 1993, as a pre 1900 building.

Mr Govan engaged Mary O’Keeffe, of Heritage Solutions, (the archaeologist) to view to the house to see if this was the case.

## Site visit

The consultant visited the house with the owner on 21 March 1993. They viewed the exterior of the house, insofar as the steep site and tight site boundaries made possible, and viewed the interior of the house.

The house is located at the rear of the section at 42A Riddiford St. It is in effect “land locked” – it has no direct street access on any side, and is surrounded by buildings on all sides (see Figure 1). The neighbouring house to the south is less than 1 metre away.

It is located on the side of the ridge than runs on the west side of and parallel to Riddiford St, and has a steep drop on its front (east) side facing Riddiford St



Figure 1: Location (42a Riddiford St arrowed)

### Description of the house

The house is a wooden two storied bungalow on a steep section.



Figure 2: Exterior, front (east) elevation

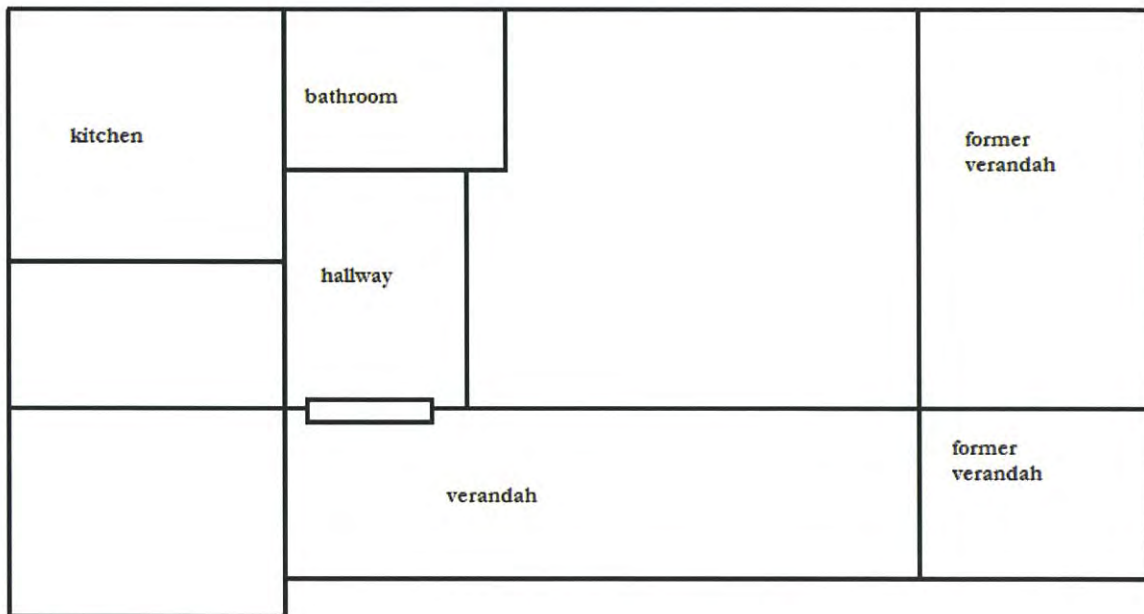


Figure 3: House plan

This interior plan is not to scale.

The house would have originally been L shaped; the veranda along the front (east) elevation is still open whereas the veranda along the north elevation has been closed into two rooms.



Figure 4: Front (east) veranda



Figure 5: Closed in veranda, north elevation



**Figure 6: Original external weatherboards beneath cladding of north veranda**

The house is in extremely poor condition, and has been used as a flat and more recently a squat. Much of the interior and exterior fabric is in poor condition, although structurally it seems sound.

The external walls are clad in overlapping weatherboards. Exterior access was extremely difficult due to the steep slope and tight site boundaries, but three of the four elevations were viewed (south, east and north). All are clad in the same profile weatherboards.



**Figure 7: Weatherboards on front (east) elevation**



**Figure 8: Weatherboards on south-east corner of house, seen in centre of picture past closely adjacent neighbouring house**

The main access is through the front door on the upper level; wooden stairs rise to the veranda.



**Figure 9: Stairs to east veranda**

The three downstairs rooms would have been a laundry and similarly functional rooms.



Mr Govan advises that the hospital owned the house in the 1960s. At this time it was rewired and regibbed.

The interior walls are all clad in plasterboard, nailed onto the original horizontal sarking. There is no intact wallpaper beneath the plasterboard; the archaeologist ripped off pieces of plasterboard to check.



**Figure 10: Sarking beneath plasterboard**

The former fireplace in the kitchen is constructed of machine-made bricks with modern concrete mortar.



**Figure 11: Fireplace**

It appears that older elements have been reused in the house: some interior doors look like exterior ones, and windows are a mixture of old and new.



**Figure 12: Possible exterior door reused in interior**



Figure 13: Contrasting sash and modern windows

### History of the site

The house is located on former town acre 918, which was one of the early town acres included in Mein Smith's first plan of Wellington city<sup>1</sup>. The town acre is in the triangle formed by the intersection of Riddiford St (formerly Revans St) and Adelaide Rd.

A house is shown on the site in Ward's 1891 plan, compiled as part of his city survey undertaken for the then Wellington City Corporation. Figure 14 shows detail from sheet 79 of Ward's survey; the location of 42a Riddiford St is arrowed.

The house shown on sheet 79 is clearly not the house on site, as the footprint is completely different to the house currently on site.

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<sup>1</sup> It can be seen on survey plan SO 10408, 1840

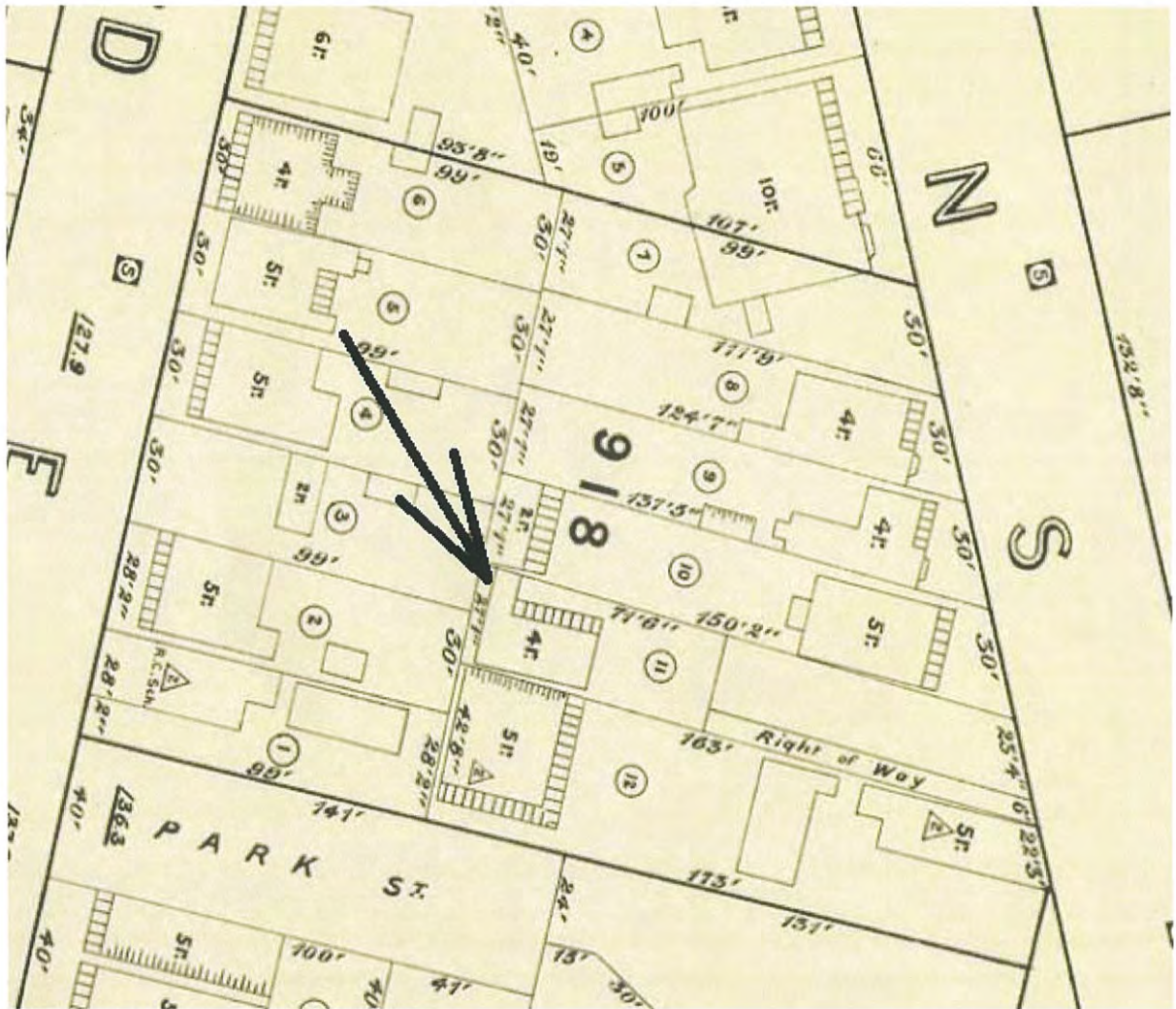


Figure 14: Location of 42a Riddiford St

The current house is shown on a plan dating to 1929 (Figure 15).

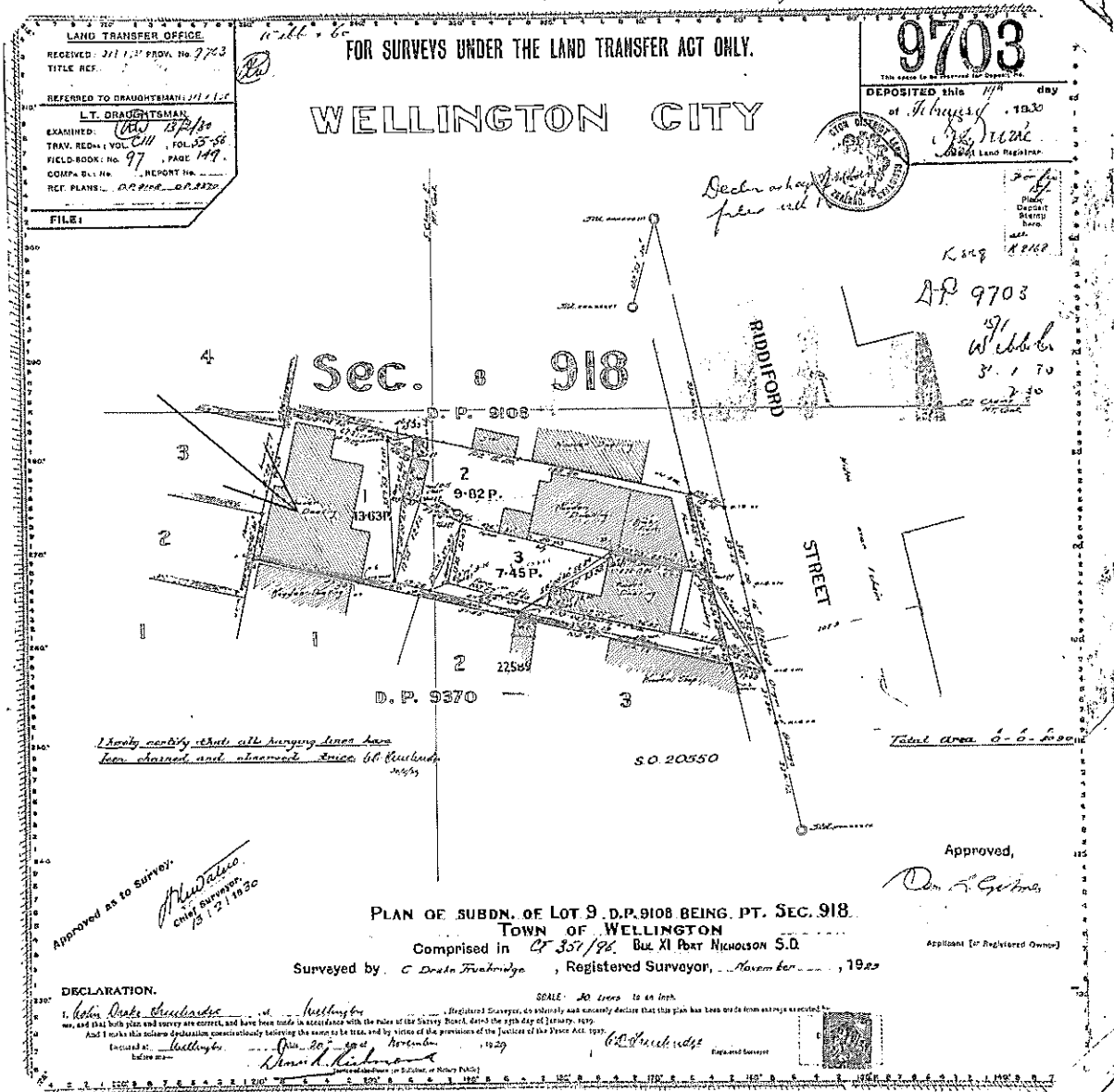


Figure 15: DP 9703, 1929

## Conclusions

The house has clearly been modified at various points through its life, most notably in the 1960s when plasterboard cladding was added to all interior rooms.

However, it is the archaeologist's professional opinion that, modifications notwithstanding, the original house dates to about the 1920s. This is on the basis of three lines of evidence:

- Appearance – its architecture and internal layout suggests it is a bungalow dating to about the 1920s
- Weatherboards – the profile of the weatherboards is consistent with that used from about the 1920s<sup>2</sup>. This is in marked contrast with the rusticated weatherboards seen on the villas in the vicinity of the house, most notably up nearby Nikau Terrace, and along Adelaide road to the west of the house.

<sup>2</sup> Arden and Bowman, 2004: 92

- The house shown on Ward's 1891 plan is not the house currently on site. The house on site is seen on plans dating from the later 1920s, and is not seen on plans predating this.

**In conclusion, the archaeological provisions of Part 1 of the Historic Places Act 1993 are not triggered by the proposal to demolish this house.**

## References

Survey plans:

SO 10408

SO 20550

DP 9108

DP 9703

Arden, S and I Bowman: *The New Zealand Period House. A Conservation Guide*. Random House, 2004

# APPENDIX SEVEN

---

Traffic and Parking Assessment

# Harriet Fraser Traffic Engineering & Transportation Planning

PO Box 40170  
Upper Hutt  
5140

P 04 526 2979

M 027 668 5872

E [harriet@harrietfraser.co.nz](mailto:harriet@harrietfraser.co.nz)

9 March 2015

Mr James Beban  
Senior Resource Consents Planner  
Cuttriss Consultants Ltd  
PO Box 30429  
Lower Hutt

**Copy via email:** [james@cuttriss.co.nz](mailto:james@cuttriss.co.nz)

Dear James

## **Proposed Private Plan Change, 42A Riddiford St, Newtown, Wellington Transportation Assessment**

Further to your request, I am pleased to provide below a transportation assessment for the proposed private plan change involving the rezoning of 42A Riddiford Street in Newtown from Inner Residential Area to Centres Area. The assessment that follows includes a review of the existing local transportation characteristics, summary of the District Plan transportation requirements for each of the existing and proposed zoning, and an assessment of the traffic effects associated with redevelopment of the site under each zoning.

In summary the findings of the assessment show that the proposed rezoning of No.42A Riddiford Street to Centres Area would enable the site along with the two frontage sites (No.s 40 and 42 Riddiford Street) to be developed in a manner which is consistent with the District Plan traffic and transportation related objectives and policies for the Centres Area zoning.

### **1. Background**

The existing site is occupied by a single dwelling. The site is a rear section with no vehicle access. A pedestrian access runs along the southern boundary. The owner of the site also owns 40 and 42 Riddiford Street which are zoned Centres Area and are located in front of 42A Riddiford Street with direct frontage onto Riddiford Street. The two frontage properties each have a single dwelling. There is no drive on access to No.40. There is space for a single vehicle to park on-site at 42 Riddiford Street, the vehicle is unable to turn on-site so reversing out onto Riddiford Street is required. Photograph 1 shows the frontage arrangement.

The assessment that follows assumes that if the site was rezoned it would be redeveloped in conjunction with the two frontage sites with the future possibility of achieving vehicle access to the overall site.

### **2. Existing Traffic Environment**

The site is located on the western side of Riddiford Street opposite the hospital and immediately to the south of the signalised pedestrian crossing. The cross-section of Riddiford Street in this location measures some 27m and comprises from west to east:



- a footpath;
- a parking/bus stop/northbound morning clearway lane;
- two northbound traffic lanes;
- a flush median;
- two southbound traffic lanes;
- a parking/bus stop lane; and
- a footpath.

Views looking north and south along Riddiford Street from the site frontage are shown in Photos 2 and 3.



**Photo 1 – No.s 40 and 42 Riddiford Street, Newtown**



**Photo 2 – Looking North along Riddiford Street**



**Photo 3: Looking South along Riddiford Street**

Riddiford Street is classified as a Principal Road in the Wellington City Council road hierarchy. As such it has the following intended functions:

- provides access to arterial roads and to motorways;
- has dominant through vehicle movement and carries major public transport routes;
- access to property may be restricted and rear servicing facilities may be required; and
- parking is provided in separate parking lanes.

A recent Wellington City Council traffic count shows weekday daily traffic volumes of up to around 10,300 vehicles per day in each direction on Riddiford Street along the frontage to the hospital. Peak hourly flows of up to around 800 vehicles per hour in each direction were recorded.

A search of the NZTA crash database for the most recent five years shows that there has been one minor injury and seven non-injury reported accidents on the mid-block section of Riddiford Street between the main hospital entrance and the emergency department entrance. These accidents can be summarised as follows:

- a minor injury accident involving a northbound car on Riddiford Street losing control and hitting a house/building/other when the driver's attention was diverted;
- a southbound car on Riddiford Street hitting a parked car while manoeuvring;
- two accidents involving a northbound car hitting the rear of a queue when the driver's attention was diverted;
- a southbound car hit a car making a u-turn from the same direction;
- a northbound van hitting a parked vehicle when driver misjudged speed of their vehicle;
- a collision between a northbound car and a motorcycle with both drivers being noted as being emotionally upset/road rage; and
- a southbound car hit the rear of a queue.

Given that this is a very busy central city street there is nothing unusual in the nature of the reported accidents and no particular pattern of accidents.

The bus stops that serve the hospital are located on Riddiford Street immediately to the north of the site. As such the site has ready access to twelve bus services providing connections to destinations throughout the city.

Along the section of Riddiford Street between the main hospital entrance and Mein Street there is one P10, three P15, six P30 and 38 P60 kerbside parking spaces. Sample parking surveys indicate that these spaces are indicatively up to 92% and 81% occupied on weekday mornings and over Saturday lunchtimes respectively. Apart from within the hospital grounds there is no conveniently located all day parking within the immediate vicinity of the site and the short stay kerbside spaces are at times very close to being full.

### **3. District Plan Transportation Requirements**

Objectives, policies and standards included in the Wellington City District Plan which have an influence on transportation matters within the **Inner Residential Area** and as apply to this site include:

*Objective 4.2.4 Ensure that all residential properties have access to reasonable levels of residential amenity.*

*Policy 4.2.4.1 Manage adverse effects on residential amenity values by ensuring that the siting, scale and intensity of new residential development is compatible with surrounding development patterns.*

*Objective 4.2.12 To enable efficient, convenient and safe access for people and goods within Residential Areas.*

*Policy 4.2.12.1 Seek to improve access for all people, particularly people travelling by public transport, cycle or foot, and for people with mobility restrictions.*

*Policy 4.2.12.2 Manage the road network to avoid, remedy or mitigate the adverse effects of road traffic within Residential Areas.*

*Policy 4.2.12.4 Require appropriate parking, loading and site access for activities in Residential Areas.*

*Policy 4.2.12.5 Manage the road system in accordance with a defined road hierarchy.*

#### **Standard 5.6.1.3 Vehicle Parking**

*On-site parking shall be provided as follows:*

- *residential activities: minimum 1 space per household unit*
- *in the Inner Residential Area an existing building may be converted into two household units without provision of on-site parking, provided the existing building was constructed prior to 27 July 2000 and the development will not result in more than two household units on the site*
- *all parking must be provided and maintained in accordance with sections 1, 2, and 5 of the joint Australian and New Zealand Standard 2890.1-2004, Parking Facilities, Part 1: Off-Street Car Parking*

#### **Standard 5.6.1.4 Site Access**

*5.6.1.4.1 No vehicle access is permitted to a site across any restricted road frontage identified on District Plan Maps 43 to 46.*

*5.6.1.4.2 Site access for vehicles must be formalise by a legal right of way instrument where not directly provided from a public road....*

*5.6.1.4.3 There shall be a maximum of one vehicle access to a site, except that a site with more than one road frontage may have one access per frontage.*

*5.6.1.4.4 The maximum width of any vehicle access is 3.7m in the Inner Residential Area.*

As shown within the detail of Map 45 of the District Plan vehicle access is restricted to sites along the western side of Riddiford Street between John Street and Gordon Street. As such the permitted development option for the existing site is restricted to converting the existing building into two dwellings.

Objectives, policies and standards included in the Wellington City District Plan which have an influence on transportation matters within the **Centres Area** and would apply to this site include:

*Policy 6.2.1.2 Allow for the outward expansion of existing Centres when they are required to accommodate growth and where they:*

- *are compatible with adjoining landuses; and*
- *improve access to goods and services, reduce congestion on the road networks; and*
- *are accessible by a variety of transport modes including public transport, walking and cycling; and*
- *do not generate more than minor adverse effects on the roading network and the hierarchy of roads from potential trip patterns, travel demand or vehicle use; and*
- *make the best use of existing infrastructure.*

*Objective 6.2.5 To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Centres.*

*Policy 6.2.5.1 Ensure that activities and developments are designed to be accessible by multiple transport modes.*

*Policy 6.2.5.3 Ensure that activities and developments that have the potential to generate significant levels of traffic incorporate design features and/or contribute to other activities so that traffic generation is minimised, and the use of public transport and active modes actively facilitated and encouraged.*

*Policy 6.2.5.4 Ensure that the location and design of activities and developments that generate significant levels of traffic or provide high levels of on-site parking are accessible by multiple transport modes and do not result in:*

- *a significant increase in traffic that would be incompatible with the capacity of adjoining roads and their function in the road hierarchy, or would lead to unacceptable congestion; or*
- *the creation of an unacceptable road safety risk.*

*Policy 6.2.5.5 Support and maintain the road hierarchy, as identified on District Plan Map 33.*

*Policy 6.2.5.6 Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility.*

*Policy 6.2.5.7 Maintain and enhance existing pedestrian accessways and thoroughfares, and where opportunities arise, create new thoroughfares and enhance pedestrian accessibility.....*

*Policy 6.2.5.8 Require the provision of appropriate servicing and site access for activities in Centres.*

### **Standard 7.6.1.5 Parking, Servicing and Site Access**

#### **Vehicle Parking**

7.6.1.5.1 All parking shall be provided and maintained in accordance with sections 1,2 and 5 of the joint Australian and New Zealand Standard 2890.1 – 2004, parking Facilities, Part 1: Off-Street Car Parking.

7.6.1.5.2 Where carparking is located within a building, a minimum height clearance of no less than 2.2m is required.

7.6.1.5.3 The gradient of carparking circulation routes shall not be more than 1 in 8.

7.6.1.5.4 Open vehicle parking areas or parking at ground level within a building must not be situated at ground level at the front of sites where standard 7.6.2.7 applies.

#### **Servicing**

7.6.1.5.5 On each site in Centres (excluding Neighbourhood Centres, as listed in Policy 6.2.1.1), at least one loading area shall be provided.....

#### **Site access for vehicles**

7.6.1.5.9 Site access shall be provided and maintained in accordance with section 3 of AS/NZS 2890.1-2004, Parking Facilities, Part 1:Off-Street Car Parking.

7.6.1.5.10 No new vehicle access is permitted to a site across a primary frontage, as identified in Planning Maps 43 to 49A.

7.6.1.5.11 Subject to standard 7.6.1.5.10 no vehicular access shall be situated closer to an intersection than the following:

*Arterial and principal streets 20m*

7.6.1.5.12 Subject to standard 7.6.1.5.10 there shall be a maximum of one vehicle access to any site except for sites that have more than one frontage....

7.6.1.5.13 The width of any vehicle crossing to a site shall not exceed 6 m.

7.6.1.5.15 All access to sites must be designed to permit a free flow of traffic so that vehicles do not queue on the street.

As shown within the detail of Map 45 of the District Plan, vehicle access is restricted to sites along the western side of Riddiford Street between John Street and Gordon Street. As such development options for the site if rezoned to Centres Area and developed in conjunction with the two frontage sites include a range of commercial activities either with or without vehicle access depending on whether the existing vehicle crossing to 42 Riddiford Street is retained and widened for commercial use.

#### **4. Traffic Effects – Existing Zoning**

With the existing zoning in place the existing residential property could be converted into two dwellings and meet the District Plan parking, access and loading standards, given the restricted access nature of the Riddiford Street road frontage. The two lots in front of the site could be redeveloped with commercial activities given their Centres Area zoning either with vehicle access

via the existing vehicle crossing or with no vehicle access given the restricted access road frontage.

The potential traffic effects associated with the development of the combined site under the existing zoning with no vehicle access can be summarised as follows:

- any daytime residential parking and visitor parking for more than 60 minutes will likely be at some distance from the site and will involve drivers circulating through an already busy local road network looking for parking spaces;
- any loading such as furniture deliveries etc would need to take place from the kerbside most likely from within the P15 spaces to the north provided such activities occurred outside the hours of operation of the clearway;
- removal of existing residential vehicle crossing to No.42 with associated reduction in vehicle movements across the footpath, say 8 to 10 vehicle movements per day and no longer generate need for a vehicle to reverse out across the footpath and onto Riddiford Street;
- removal of on-street parking and vehicle movements associated with two residential properties; and
- introduction of off-site parking demands associated with commercial activity on the two front sites. Parking demands will be associated with staff, customer and servicing.

In the event that the existing residential dwelling was converted into two units there would be some additional off-site traffic effects but given the busy traffic activity on this part of the road network any adverse effects are unlikely to be discernible to other road users.

In placing a restricted access frontage along this section of Riddiford Street it has been anticipated that the parking and delivery needs of these frontage properties will be met off-site. As such the off-site traffic effects associated with residential development of No.42A and the commercial development of No.s 40 and 42 are anticipated by the District Plan.

If the existing residential vehicle crossing to No.42 was retained to provide access to the rear of the commercial sites it is considered that it could reasonably provide access to some four carpark spaces to the rear of the site and allow for the vehicles turn and exit in a forward direction. The inclusion of some on-site parking would reduce to some extent the off-site traffic effects associated with searching for and occupying public parking spaces but would increase the traffic activity across the footpath in an area of significant pedestrian activity as pedestrians access the signalised crossing to cross Riddiford Street to and from the main hospital entrance.

It is unlikely that on-site truck servicing would be achievable given the likely multi-storey nature of the building with the height clearances needed for trucks along with the limited footprint making on-site truck turning impractical.

With regard to the District Plan objectives and policies, given that Riddiford Street is a busy Principal Road with restricted access along this frontage with heavily used short-stay kerbside parking, the residential amenity for the residential property at No.42A in terms of parking and access is poor being neither convenient nor efficient. While access to public transport is excellent given the number of bus services operating from the nearby bus stops not all access requirements can be met by public transport. Furthermore the busy nature of Riddiford Street with heavy traffic flows and associated noise has further adverse effects on the residential amenity of the property. As such the continued use of this site for residential purposes is not entirely consistent with the Residential Area traffic and transportation and residential amenity provisions of the District Plan objectives and policies.

## 5. Traffic Effects – Centres Area

With the proposed rezoning and the combined development of the three sites, the wider site could be redeveloped to accommodate a range of commercial activities either with or without vehicle access, with either option meeting the District Plan parking, access and loading standards given the restricted access nature of the Riddiford Street road frontage. The option including vehicle access would rely on the use and upgrading of the existing residential vehicle crossing to No.42.

The potential traffic effects associated with the development of the combined site under the proposed zoning with no vehicle access can be summarised as follows:

- any customer or business parking for more than 60 minutes will likely be at some distance from the site and will involve drivers circulating through an already busy local road network looking for parking spaces;
- removal of existing residential vehicle crossing to No.42 with associated reduction in vehicle movements across the footpath, say 8 to 10 vehicle movements per day and no longer generate need for a vehicle to reverse out across the footpath and onto Riddiford Street;
- removal of on-street parking and vehicle movements associated with the existing three residential properties; and
- introduction of off-site parking demands associated with commercial activity on the combined site. Parking demands will be associated with staff, customer and servicing.

As mentioned previously, in placing a restricted access frontage along this section of Riddiford Street it has been anticipated that the parking and delivery needs of these frontage properties will be met off-site. As such the off-site traffic effects associated with residential development of No.42A and the commercial development of No.s 40 and 42 are anticipated by the District Plan. One of the key matters is then whether the rezoning of No.42A to Centres Area creates significant additional adverse traffic effects when compared with the existing Residential Area zoning.

As set out earlier, the residential use of 42A Riddiford Street generates access and parking demands for the residents of the property and their visitors as well as occasional deliveries. The limited amounts of short-stay kerbside parking do not readily meet the needs of residents or their visitors given the time restrictions. Accordingly residential and visitor parks need to be accommodated within the wider network where competition for longer stay parking is high and not conveniently located close to the site. However short-stay parking better serves visitors to commercial activities and staff can either travel by public transport or by car and park within the wider street network, with proximity of parking to a work activity being of less importance than to a residential activity. As such the nature of the local roading and traffic environment while busy is better matched to meet the access and parking needs of commercial rather than residential activities.

If the existing residential vehicle crossing to No.42 was retained to provide access to the rear of the combined commercial site it is considered that it could reasonably provide access to at least ten carpark spaces with vehicles turning and exiting in a forward direction. The inclusion of some on-site parking would reduce to some extent the off-site traffic effects associated with searching for and occupying public parking spaces but would increase the traffic activity across the footpath in an area of significant pedestrian activity as pedestrians access the signalised crossing to cross Riddiford Street to and from the main hospital entrance. It would also be necessary to widen the driveway to allow for two-way traffic and given the infrastructure associated with the pedestrian signals, and in particular the solid median, would likely necessitate the exit being left out only. As with the existing zoning it is considered unlikely that on-site truck servicing would be achievable given the likely multi-storey nature of the building and the height clearances needed for trucks although the larger footprint increases the viability of providing on-site servicing.

With regard to the District Plan objectives and policies for the Centres Area, the potential for the rezoned and combined site to meet the traffic and transportation requirements is set out below.

**Policy 6.2.1.2 Allow for the outward expansion of existing Centres when they are required to accommodate growth and where they:**

- **improve access to goods and services, reduce congestion on the road networks;**

Comment – the zone change will enable an additional site to be developed for commercial purposes in an area with excellent connectivity to the public transport system and with busy pedestrian activity. Any changes in traffic activity from reduced searching for parking spaces for residential purposes or increased use of commercial customers accessing short stay spaces is unlikely to have a discernible effect on road congestion in this heavily used part of the local road network.

- **are accessible by a variety of transport modes including public transport, walking and cycling;**

Comment – the sites are located in the immediate vicinity of bus stops with frequent services to destinations throughout the city. Connectivity to the public transport system is excellent. The area is also heavily used by pedestrians, primarily accessing the hospital.

- **do not generate more than minor adverse effects on the roading network and the hierarchy of roads from potential trip patterns, travel demand or vehicle use;**

Comment – the restricted access frontage means that the off-site traffic effects of not providing on-site parking and servicing have been accepted for this section of Riddiford Street. The additional traffic effects associated with rezoning No.42A from Residential Area to Centres Area has been assessed as not being discernible from the traffic effects associated with the wider restricted access policy. In particular the immediate local road network, albeit busy, has been assessed as better providing for traffic associated with commercial rather than residential activities.

- **make the best use of existing infrastructure.**

Comment – the existing roading and transport infrastructure along this section of Riddiford Street has been assessed as most appropriately serving commercial rather than residential needs.

**Objective 6.2.5 To maintain an efficient and sustainable transport network to enable the provision of convenient and safe access for people and goods to and within Centres.**

Comment – the proposed zone change has been assessed as having no discernible adverse effects on the transport network beyond those associated with the restricted access frontage provisions along this section of Riddiford Street.

**Policy 6.2.5.1 Ensure that activities and developments are designed to be accessible by multiple transport modes.**

Comment – the site has excellent access to public transport, has direct connection with a Principal Road and is positioned on a busy pedestrian route.

**Policy 6.2.5.3 Ensure that activities and developments that have the potential to generate significant levels of traffic incorporate design features and/or contribute to other activities so that traffic generation is minimised, and the use of public transport and active modes actively facilitated and encouraged.**



Comment – the restricted access frontage provision along with the excellent connection to the public transport network will ensure that public transport usage and active modes are encouraged.

**Policy 6.2.5.4 Ensure that the location and design of activities and developments that generate significant levels of traffic or provide high levels of on-site parking are accessible by multiple transport modes and do not result in:**

- a significant increase in traffic that would be incompatible with the capacity of adjoining roads and their function in the road hierarchy, or would lead to unacceptable congestion; or
- the creation of an unacceptable road safety risk.

Comment – the combined site could be developed with or without vehicle access. If vehicle access is included the footprint of the site is such that it cannot reasonably accommodate a large amount of on-site parking.

**Policy 6.2.5.5 Support and maintain the road hierarchy, as identified on District Plan Map 33.**

Comment – Riddiford Street which is a Principal Road carrying significant traffic volumes has been assessed as being most appropriately able to meet the needs of commercial rather than residential frontage activities.

**Policy 6.2.5.6 Encourage buildings and spaces to have a high level of accessibility, particularly for people with restricted mobility.**

Comment – the combined site will be able to be developed in a manner that can provide a high level of accessibility.

**Policy 6.2.5.7 Maintain and enhance existing pedestrian accessways and thoroughfares, and where opportunities arise, create new thoroughfares and enhance pedestrian accessibility.....**

Comment – the rezoning of the rear site is not expected to have any significant additional adverse effects on pedestrian activity along the frontage footpath than can be expected with the development of the two frontage sites.

**Policy 6.2.5.8 Require the provision of appropriate servicing and site access for activities in Centres.**

Comment – this policy is not consistent with the restricted access provision along this section of Riddiford Street. The combined site could be developed either with or without on-site servicing.

By way of summary, the proposed rezoning of No.42A Riddiford Street to Centres Area would enable the combined site to be developed in a manner which, with the exception of Policy 6.2.5.8, is consistent with the District Plan traffic and transportation related objectives and policies for the Centres Area zoning.

## **6. Consultation with Council**

The proposed plan change has been discussed with Brendon Stone, Principal Transport Planner at Wellington City Council. He seems comfortable with the proposed plan change as I described it to him.

Down the track once our client is developing a resource consent application for the development of the combined site, Brendon indicated the following:

- the restricted access frontage overrules the on-site servicing requirement. He seemed comfortable with servicing from the nearby P10 and P15 kerbside spaces;
- if there were a vehicle crossing, vehicles would need to be able to enter and exit in a forward direction; and
- given the bus activity, pedestrian activity and proximity to the traffic lights he would be comfortable with and most likely would have a preference for no vehicle access onto the site.

## 7. Summary and Conclusion

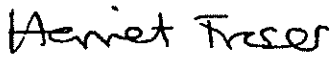
The findings of this transportation assessment can be summarised as follows:

- the site is currently occupied by a single dwelling and is on a rear site with no vehicle access to Riddiford Street;
- Riddiford Street is a Principal Road with traffic flows of up to around 20,600vpd, accommodates at least twelve bus services and has heavily used short stay kerbside parking. The historic road safety record shows no particular pattern of accidents;
- the District Plan includes a restricted access provision for sites along the western side of Riddiford Street from John Street to Gordon Street, as such it is anticipated that the parking and servicing needs of these properties will be met off-site;
- the residential amenity for the residential property at No.42A in terms of parking and access is poor being neither convenient nor efficient. While access to public transport is excellent given the number of bus services operating from the nearby bus stops not all access requirements can be met by public transport. Furthermore the busy nature of Riddiford Street with heavy traffic flows and associated noise has further adverse effects on the residential amenity of the property; and
- the proposed rezoning of No.42A Riddiford Street to Centres Area would enable the combined site to be developed in a manner which is consistent with the District Plan traffic and transportation related objectives and policies for the Centres Area zoning for Riddiford Street.

Accordingly Riddiford Street has been assessed as being most appropriately able to meet the traffic and transportation needs of commercial rather than residential frontage activities. As such the rezoning of 42A Riddiford Street to Centres Area is anticipated to allow the site to be developed in a way which is more consistent with the District Plan traffic and transportation objectives and policies.

Please do not hesitate to be in touch should you require clarification of any of the above.

Yours faithfully



Harriet Fraser

# APPENDIX EIGHT

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Economic Assessment

19 September 2014

Via E-mail: [chris@cuttriss.co.nz](mailto:chris@cuttriss.co.nz)

**Cuttriss Consultants Ltd**

c/- Chris Rodie  
92 Queens Drive  
Level 3 MacKay House  
PO Box 30 429  
Lower Hutt 5040  
WELLINGTON

Dear Chris,

**RE: Economic Overview - 42A Riddiford Street, Newtown, Wellington**

Property Economics has been engaged by Cuttriss Consultants Ltd to assess the appropriateness of a proposed Private Plan Change to the Wellington City District Plan to rezone 42A Riddiford Street in Newtown, Wellington from 'Inner Residential' to 'Centre' zone from an economic perspective under the RMA.

The subject site comprises a 345sqm area of land and is situated one site back from the Riddiford Street road frontage.

It is Property Economics' understanding that the owner of 42A also owns the properties at 40 and 42 Riddiford Street immediately adjoining the subject site. These sites are already zoned 'Centre' under the Operative District Plan, and if consolidated together (potentially) the sites would enable a more comprehensive and integrated commercial development to be undertaken incorporating all three sites.

From an economic perspective, the proposed redevelopment encompasses two pertinent changes:

1. Marginal reduction of residential land supply of 345sqm (basically one site).
2. Marginal increase in the commercial land supply and capacity within the Newtown suburban centre.

**Point 1** results from rezoning the subject site from its existing 'Inner Residential' to 'Centre' zone. This ultimately reduces the residential land supply available within the local area, albeit only by a very small marginal contextually and as such is considered inconsequential. However the 42A Riddiford Street land parcel is isolated and not well integrated with the other residential activity in close proximity due to the elevation differential between the subject site and the residential activity along Adelaide Road.

Despite 42A Riddiford Street being located adjacent other residential properties located on Nikau Street and Adelaide Road, the subject site can only be accessed via the Newtown suburban centre off Riddiford Road that is primarily zoned for suburban centre activity, i.e. the site's setting is commercial rather than residential environment.

**Point 2** relates to the enablement of a new commercial development, probably integrating all three sites of 40, 42 and 42A Riddiford Street, albeit that is not critical to the conclusions reached in this overview. At most this development will add a small 350sqm of additional land area to the existing 'Centre' zone within Newtown. An additional provision that is implausible to generate adverse effects of a material nature to the existing centre network, and will complement the existing Newtown commercial environment rather than compete with or undermine it. Any effects generated are considered to be 'trade competition' only in their genesis, as the site essentially forms part of the wider Newtown suburban centre.

Also residential growth in the surrounding suburbs the Newtown suburban centre services is likely to require additional commercial activity in the future. This is optimally provided for within the existing Newtown suburban centre.

The subject site, being a very small site in the wider context, is likely to form only part of the growth requirement solution. Importantly, the subject site is within and functions as part of the Newtown suburban centre, and therefore the proposed rezoning is considered a pragmatic and common sense outcome from an economic perspective in terms of fulfilling the higher order objectives of the District Plan to support the existing centre network and channel new commercial development into existing centres where practical.

Economic impacts can result from various sources, including time savings to businesses, household and business vehicle operating cost savings, the strengthening of local and regional market connectivity, induced land development, or increased tourism. In all cases, economic impacts arise when a project causes a change in prices, a change in household behaviour, or a change in business behaviour that affects business investment, attraction, expansion, retention, or competitiveness in the area of concern.

For the purposes of this overview the cost benefit analysis includes the potential impacts upon the localised economy, its function and prosperity as well as the level of community wellbeing experienced.

In terms of S32 of the RMA, and given the small quantum of land proposed to be rezoned, in this instance Property Economics consider a full cost-benefit assessment is not warranted. Any potential economic costs such as reduction in residential land supply are likely to be significantly outweighed by the potential economic benefits including increased commercial choice and accessibility, increased local employment, economic injection via construction and ongoing flow-on benefits and increased amenity. Therefore the net economic benefits are likely to subjugate the economic costs of the proposed private plan change by a large margin.

Overall, the private plan change in my opinion is highly likely to provide net benefits to the social and economic wellbeing of the Newtown community by providing additional commercial business space within the existing Newtown suburban centre, increasing employment opportunities, and land use efficiency without disabling the community or jeopardising any other centres in the wider network. Therefore the proposed private plan change is likely to lead to net positive effects on the community when considered in the round.

If you have any queries in relation to the above, please give me a call.

Yours faithfully



**Tim Heath**  
Managing Director

**APPENDIX 1: PROPOSED PRIVATE PLAN CHANGE 42A RIDDIFORD STREET SITE**



# APPENDIX NINE

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Consultation Plan





AMENDMENT	NAME	DATE

- LEGEND:**
- PROPERTIES CONTACTED
  - EXTENT OF PROPERTY TO BE REZONED

Curtiss Consultants Limited  
 Hunt Valley, Wellington, Capital Coast



- Lower the Beach, Lower the Coast, 20 Queen Drive, Lower the Beach, Hunt Valley, Wellington, Capital Coast
- Pigeon Point, 1000 Pigeon Point Road, Hunt Valley, Wellington, Capital Coast
- Pigeon Point, 1000 Pigeon Point Road, Hunt Valley, Wellington, Capital Coast
- Pigeon Point, 1000 Pigeon Point Road, Hunt Valley, Wellington, Capital Coast

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**CLIENT**  
 CHUNI GOVAN

**JOB**  
 PROPERTIES CONTACTED  
 AS PART OF  
 THE CONSULTATION PROCESS

**SCALE**  
 NOT TO SCALE

FIELDWORK	NAME	DATE	DRAWING NUMBER
DESIGNED			28423PC
DRAWN	DPS	08/14	SHEET 2 OF 3 SHEETS
CHECKED	CR	08/14	REVISION

# APPENDIX TEN

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Consultation Letter

ref: BebanJ/28423

PO Box 30 429  
Level 3  
Mackay House  
92 Queens Drive  
Lower Hutt 5040  
Tel: 0-4-939 9245  
Fax: 0-4-939 9249  
Email: [hutt@cuttriss.co.nz](mailto:hutt@cuttriss.co.nz)

Also at Paraparaumu

xxxxxx 2014

Xxxxxx  
Xxxxxx  
Xxxxxx  
xxxxxx

Dear Sir/Madam

### **PROPOSED PLAN CHANGE – 42A RIDDIFORD STREET, NEWTOWN**

On behalf of our client Chuni Govan, we are writing to you to seek your views and feedback on a Proposed Private Plan Change at 42A Riddiford Street, Newtown (Refer to the location plan enclosed). This property is currently within the Inner Residential Area of the Wellington City District Plan which allows for the application site to be developed for multiple uses including residential dwellings and childhood centres. Our client is proposing to rezone the property through the plan change process to the Suburban Centre Area.

The Suburban Centre Area zone is consistent with the zoning of the properties that adjoin Riddiford Street. This zone would allow for the establishment of a commercial development on the site subject to the District Plan rules. The proposed zone would allow a building up to a height of 12m. However, within 5m of the properties residentially zoned a building could only be up to a height of 3m and would need to be contained within the recession plane requirements of the District Plan.

As part of this plan change process, we have commissioned a report on the potential traffic effects associated with the proposal. It is our belief that any potential traffic effects will be able to be addressed to ensure that the site is suitable for commercial development.

I can confirm that we will not be seeking to change the existing rules of the District Plan which pertain to the Suburban Centre Area. Rather, we are seeking to change the underlying zoning of the application site, with any future development being subject to the existing rules of the District Plan. We believe that this approach will allow any future commercial development of the site to be consistent with the existing character of the local area.

You have been identified as a party which may be interested in the Proposed Plan Change and we would like to invite you to provide any feedback which you may have. This can be done by either giving me a call on (04) 939 9245 or emailing me at [james@cuttriss.co.nz](mailto:james@cuttriss.co.nz). Alternatively, I would be happy to meet with you at your convenience to discuss this proposal. We would very much appreciate any feedback regarding this proposed plan change being received by xxxxxx 2014.

Yours sincerely,

James Beban  
Senior Resource Consents Planner  
**CUTTRISS CONSULTANTS LTD**