

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Peter Kelly	16.1	Support	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land. Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land: Seeks that the proposed District Plan gives effect to paragraph 6 of the amendment in the name of Councillors Jenny Condie and Rebecca Matthews.
Whole PDP / Whole PDP / Whole PDP	Lizzie Waugh	30.1	Support	Supports higher density housing in Newtown.	Retain as notified.
Whole PDP / Whole PDP / Whole PDP	Brendon White	36.1	Support	Supports the changes in the PDP that allow more intensification for the reasons of - housing affordability - climate change - productive land use	Retain intensification provisions as notified.
Whole PDP / Whole PDP / Whole PDP	New Zealand Agricultural Aviation Association	40.1	Not specified	Restrictive district plan requirements can adversely affect the ability of aerial operators to undertake and respond (particularly to biosecurity and biosecurity threats).	Seeks that the use of airstrips and helicopter landing areas for agricultural aviation activities on an intermittent basis are adequately provided for in the Proposed District Plan.
Whole PDP / Whole PDP / Whole PDP	Paul Burnaby	44.1	Amend	Considers that Council should provide heritage incentives to encourage the appropriate recognition and protection of places of historic heritage value. The following are examples to indicate the types of incentives, and is certainly not meant to be exhaustive, as there are many incentives that may be open to Council: (a) Enabling Transferrable Development Rights (TDRs) for owners of historic heritage places (b) Providing a 'fast-track' process for proposed development where a Conservation Plan has been prepared and provided for a historic heritage place, and where the Conservation Plan has been used to guide the proposed development.	Seeks that Council provide heritage incentives to encourage the appropriate recognition and protection of places of historic heritage value.
Whole PDP / Whole PDP / Whole PDP	Robert and Chris Gray	46.1	Amend	Considers that growth estimates are a key component to a successful plan. It is unclear what the final impact of Covid and the new working landscape will have on the city.	Seeks that the Council split the 30 year District Plan into three 10 year stages to allow for reviewed and updated population growth estimates every 10 years.
Whole PDP / Whole PDP / Whole PDP	Robert and Chris Gray	46.2	Not specified	Considers that critical mass is required to preserve character and that WCC officers' recommended character precincts in Mt Victoria, guided by the Boffa Miskell Report, were reduced significantly with reasons for this decision not clear.	Seeks clarification as to why the character areas were reduced in size.
Whole PDP / Whole PDP / Whole PDP	Robert and Chris Gray	46.3	Not specified	Considers that a number of empty office buildings will be suitable for converting to residential and that this could be attractive to students among others.	Seeks that the Council split the 30 year District Plan into three 10 year stages to allow for reviewed and updated population growth estimates every 10 years.
Whole PDP / Whole PDP / Whole PDP	Grant Birkinshaw	52.2	Oppose	Considers that the District Plan Review is overly complex, and becomes less a document for the public use, and more one requiring professional (and expensive) advice to use. The District Plan Review is a discouragement of public participation in what should be a democratic instrument. The evolution of District Plans has deteriorated to this extent and requires a fresh approach.	Opposes the District Plan Review in its entirety.
Whole PDP / Whole PDP / Whole PDP	Grant Birkinshaw	52.3	Amend	Considers that the District Plan review, as notified, should be reassessed to become a more user friendly public document.	Seeks that the District Plan Review process be reassessed to become a more user friendly public document.
Whole PDP / Whole PDP / Whole PDP	Heritage New Zealand Pouhere Taonga	70.1	Support in part	Acknowledges the differentiation between historic heritage and character precincts, even though there is some overlap with some character precincts also being identified as heritage areas, or containing heritage buildings.	Not specified.

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Whole PDP / Whole PDP / Whole PDP	Aro Valley Community Council	87.1	Not specified	<p>The Aro Valley Community Council does not believe that the PDP understands or adequately responds to a number of important considerations (sunlight, aging infrastructure, character homes, wellbeing for community members particularly marginalised peoples).</p> <p>Considers HRZ zoning is inappropriate and some sites should retain character protection provided by the ODP.</p> <p>Considers that while intensification is important, it should not be at the expense of fundamentals such as biodiversity, sunlight and human scale.</p>	Seeks site specific changes to zoning.
Whole PDP / Whole PDP / Whole PDP	Aro Valley Community Council	87.2	Not specified	<p>Considers that sunlight is scarce in Aro Valley and further losses of this will be unacceptable.</p> <p>Sunlight is a key component of health and wellbeing and it the Council's responsibility to protect and promote community wellbeing.</p>	Seeks site specific changes to zoning.
Whole PDP / Whole PDP / Whole PDP	Aro Valley Community Council	87.3	Not specified	<p>Considers that any increase in population density must be accompanied by, and increase, sunny and accessible open space.</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Te Herenga Waka Victoria University of Wellington	106.2	Amend	<p>Considers that the term 'cannot be achieved' implies the standard must be complied with unless it is impossible to do so and should be changed to 'is not achieved' throughout the entirety of the Proposed District Plan.</p> <p>Amending the language to 'is not achieved' reflects language used in district plans elsewhere in the country and provides greater consenting flexibility for when permitted activity standards are not met.</p>	Seeks that all instances of 'cannot be achieved' in the Proposed District Plan are changed to 'is not achieved'.
Whole PDP / Whole PDP / Whole PDP	Oliver Sangster	112.3	Support	<p>Supports general thrust of the plan to increase density in neighbourhood areas</p>	Retain growth approach of intensification.
Whole PDP / Whole PDP / Whole PDP	Victoria University of Wellington Students' Association	123.4	Support	<p>Supports all moves towards higher density housing.</p> <p>Significant housing supply increases are necessary and effective in improving housing affordability.</p> <p>Higher density housing is more sustainable, affordable, and resource-efficient approach, and promotes connectivity within the city.</p>	<p>Seeks that all moves towards higher density housing are supported.</p> <p>[Inferred decision requested].</p>
Whole PDP / Whole PDP / Whole PDP	Victoria University of Wellington Students' Association	123.5	Amend	<p>Considers that the PDP is not ambitious enough with regard to sustainability, resilience, and climate change and does not adequately recognise that we are in a climate emergency.</p>	Seeks that the proposed District Plan should refer to the 2022 Intergovernmental Panel on Climate Change (IPCC) Summary for Policymakers report, and plan and revise the District Plan, as a living document, with the specific warnings for these time frames in mind – particularly focusing on preparing for long-term consequences.

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Whole PDP / Whole PDP / Whole PDP	Victoria University of Wellington Students' Association	123.6	Not specified	<p>Considers that the IPCC <i>Summary for Policymakers</i> explains that in terms of adaptation and preparation for climate change, lower income population groups will suffer most from adaptation gaps. [Refer to original submission for full reasons].</p> <p>Considers that WCC should take full heed of the IPCC warning and plans now in order to protect the most vulnerable communities in the future.</p> <p>Increasing climate resilience in Pōneke Wellington looks like addressing poverty.</p> <p>The needs of the private sector are often over-represented in city planning and development plans, however to improve climate resilience and social justice, vulnerable communities need to be at the front and centre of plans and city design.</p>	<p>Seeks that the District Plan should support the creation and maintenance of affordable, warm, dry and safe housing, infrastructure and spaces that support community-building and inclusion, improving shelter conditions, and more.</p>
Whole PDP / Whole PDP / Whole PDP	Airbnb	126.3	Support	Supports the permitted status for visitor accommodation in all zones.	<p>Retain provisions providing for visitor accommodation as an Permitted Activity in the PDP as notified.</p> <p>[Inferred decision requested].</p>
Whole PDP / Whole PDP / Whole PDP	Airbnb	126.4	Not specified	<p>Considers that home sharers must also be good neighbours and take the issues of managing wrongdoers seriously. This is why we are eager to work with governments and communities on policies that address amenity concerns and have supported frameworks to resolve issues.</p> <p>[Refer to original submission for full reasons].</p>	Seeks that a standardised approach is utilised to assess impacts on amenity values from visitor accommodation activities.
Whole PDP / Whole PDP / Whole PDP	Precinct Properties New Zealand Limited	139.1	Support	<p>Generally supports the aims of the PDP. In particular Precinct Properties supports the following features and objectives of the plan:</p> <ul style="list-style-type: none"> (a) the creation of well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (NPS-UD)); (b) the provision of sufficient development capacity to meet long term demands for housing and business land; (c) the provision of a compact urban form and urban intensification; and (d) the hierarchy of centres, and the recognition of the City Centre as the primary centre serving the wider Wellington region. 	Not specified.
Whole PDP / Whole PDP / Whole PDP	Precinct Properties New Zealand Limited	139.2	Amend	<p>Considers that it is not appropriate that the Council's discretion is restricted to all matters in the Design Guide. This does not give any clear direction or certainty for applicants, and would be onerous for the preparation and assessment of resource consent applications. Rather than being formally incorporated into the District Plan, the design guides should be reference documents that sit outside the District Plan.</p> <p>Incorporating the design guides into the district plan elevates these provisions into the form of standards, rather than what they are intended to be as guidance.</p>	Seeks that all direct references to the design guides in the Proposed District Plan provisions are deleted and replaced with references to the specific design outcomes that are being sought.
Whole PDP / Whole PDP / Whole PDP	John Tiley	142.1	Support	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the following wording ('Protects the natural ridge top around the Upper Stebbings Valley to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network') is typical of dealing with all ridgelines.
Whole PDP / Whole PDP / Whole PDP	Grant Buchan	143.4	Amend	Considers that the Spatial Plan was agreed through a robust process and it is inappropriate to relitigate character protections/height limits.	Seeks that where character protections or height limits have been imposed over the Spatial Plan recommendations, these are removed.

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Grant Buchan	143.5	Amend	Considers that where restrictions in the Spatial Plan are inconsistent with the NPS-UD and MDRS they should be removed, even if these were present in the Spatial Plan.	Seeks that height limits inconsistent with the NPS-UD (National Policy Statement on Urban Development) are removed.
Whole PDP / Whole PDP / Whole PDP	Matthew Gibbons	148.2	Support	Considers there should be increased densification throughout Wellington, including in Character Precincts.	Supports the Proposed District Plan provisions that enable intensification.
Whole PDP / Whole PDP / Whole PDP	Amos Mann	172.6	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that easier consenting and incentives for accessible and eco-friendly developments are provided for.
Whole PDP / Whole PDP / Whole PDP	Amos Mann	172.7	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the District Plan prioritises emissions reduction, better quality of life, and community cohesion and resilience.
Whole PDP / Whole PDP / Whole PDP	Amos Mann	172.8	Not specified	Supports integrating circular economy principles into the District Plan.	Seeks that waste is minimised and designed out of construction projects, and that resource recovery infrastructure is put in place to manage any remaining waste.
Whole PDP / Whole PDP / Whole PDP	Amos Mann	172.9	Not specified	Considers that green space should be recreational, food producing, and support biodiversity. Community gardens and green stormwater infrastructure should maximise their value across all these outcomes.	Seeks that the District Plan supports the creation of a sustainable and resilient local food and biodiversity network system.
Whole PDP / Whole PDP / Whole PDP	Amos Mann	172.10	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that Tangata Whenua and Te Tiriti are placed at the core of planning.
Whole PDP / Whole PDP / Whole PDP	Historic Places Wellington	182.2	Support	Supports provisions of the PDP aimed at planning for a capital city that is compact, resilient, energetic, prosperous, inclusive, connected, green, and partnered with mana whenua.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Churton Park Community Association	189.1	Support	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the following wording ('Protects the natural ridge top around the Upper Stebbings Valley to provide a natural backdrop to Upper Stebbings and Tawa valleys and a connected reserves network') is typical of dealing with all ridgelines.
Whole PDP / Whole PDP / Whole PDP	Chris Howard	192.7	Oppose	<p>Opposes the Proposed District Plan for the following reasons:</p> <ul style="list-style-type: none"> - Considers that it ignores that there are numerous streets in greater Wellington that contain well maintained, character, semi-heritage buildings that are predominantly single storey. -considers that the plan does not enable residential intensification that is carefully tailored to avoid destroying the widespread special character that exists across many of the city's well-established suburbs. - considers the plan risks being highly damaging to local character and the city's unique beauty and liveability. - considers the plan risks unnecessarily fragmenting neighbourhood cohesion, due to development fairness inequity - one size fits all approach to intensification across Wellington in not appropriate across our varied property sections and suburbs. <p>[Refer to original submission for full reason]</p>	Seeks that the Council urgently undertake an updated section-by-section, and street-by-street review of all areas in their draft spatial plan to determine what level of intensification is contextually appropriate for a given section or area.
Whole PDP / Whole PDP / Whole PDP	Antony Kitchener and Simin Littschwager	199.2	Oppose in part	Opposes the parts of the PDP where the northern suburbs of Crofton Downs, Ngaio and Khandallah are sacrificed for densification.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Angus Hodgson	200.3	Support	Supports provision of more housing through increased height limits across more of Wellington City.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.7	Not specified	[No specific reason given beyond decision requested - refer to original submission]	Seeks that Council actively seek and actively listen to voices of mana whenua.

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Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.8	Not specified	<p>Considers the importance of Councils partnership with mana whenua throughout the decision making process.</p> <p>Considers that Iwi resources are often stretched by demands of crown authorities.</p> <p>Considers the importance of tools such as apū/Iwi Resource Management Plans</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.9	Not specified	[No specific reason given beyond decision requested - refer to original submission]	Seeks that Council use its resources in partnership with local iwi to provide for papakāinga housing, marae, and Māori customary and commercial activities to support the social, cultural, and economic wellbeing of tangata whenua across Te Whanganui-a-Tara.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.10	Not specified	[No specific reason given beyond decision requested - refer to original submission]	Seeks that barriers to tangata whenua exercising kaitiakitanga over their ancestral lands are removed.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.11	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the plan is implemented alongside mana whenua to protect sites of spiritual and cultural significance from the impacts of climate change and pollution.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.12	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the consenting process is improved to support in-fill developments overcome logistical and delay challenges.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.13	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that mixed use residential and commercial areas along public transport lines is encouraged to facilitate shorter trips for climate and wellbeing and better accessibility.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.14	Support	[No specific reason given beyond decision requested - refer to original submission]	Supports increase of density in existing urban areas.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.15	Amend	Considers that PDP should employ environmentally friendly urban planning techniques. This including - but not limited to - Creating neighbourhoods that are more walkable, less car-centric, and have direct access to public transport lines, in addition to recreational community spaces with green amenities.	Seeks that PDP promotes environmentally friendly urban planning techniques such as creating neighbourhoods that are more walkable, less car-centric, and have direct access to public transport lines, in addition to recreational community spaces with green amenities.
Whole PDP / Whole PDP / Whole PDP	Wellington City Youth Council	201.16	Not specified	Considers that increasing housing supply, climate resilience and designing a city that meets the needs of its people, in partnership with mana whenua, is paramount.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Avryl Bramley	202.3	Oppose	<p>Considers that the PDP's assumption of 50,000 - 80,000 population increase by 2050 is incorrect and is more likely to be 28,000.</p> <p>A number of issues are raised regarding whether:</p> <ul style="list-style-type: none"> - this figure been subjected to, or does the possibility exist of, bias, manipulation, control or corruption by parties who stand to benefit from the extreme intensification whilst possibly bearing few of the costs. - extreme intensification, particularly in multi story residential, would result in sale to non residents and an increase in "nobody home " buildings as seen overseas. - the figure would enable a large part of the dwellings in the city to fall under the control of the "corporate landlord" with the downstream negative effects of monopoly rents or use as de-facto hotels like Berlin. - independent arms length increases were not used as per Statistics NZ, - how this proposed level of population increase can be seen as filling any green objectives whatsoever. - how this serves and embraces TOW principles and needs, - how democratic is it for one set of Councillors in a single 3 year term to set such a high track for a horizon of 30 years and 10 future councils. <p>[Refer to original submission for full reason]</p>	Seeks the removal of all elements of the PDP that are relying on the assumption of 50,000 - 80,000 population growth by 2050.

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Whole PDP / Whole PDP / Whole PDP	Avryl Bramley	202.4	Amend	<p>Considers that the PDP's assumption of 50,000 - 80,000 population increase by 2050 is incorrect and is more likely to be 28,000.</p> <p>A number of issues are raised regarding whether:</p> <ul style="list-style-type: none"> - this figure been subjected to, or does the possibility exist of, bias, manipulation, control or corruption by parties who stand to benefit from the extreme intensification whilst possibly bearing few of the costs. - extreme intensification, particularly in multi story residential, would result in sale to non residents and an increase in "nobody home " buildings as seen overseas. - the figure would enable a large part of the dwellings in the city to fall under the control of the "corporate landlord" with the downstream negative effects of monopoly rents or use as de-facto hotels like Berlin. - independent arms length increases were not used as per Statistics NZ, - how this proposed level of population increase can be seen as filling any green objectives whatsoever. - how this serves and embraces TOW principles and needs, - how democratic is it for one set of Councillors in a single 3 year term to set such a high track for a horizon of 30 years and 10 future councils. <p>[Refer to original submission for full reason]</p>	Seeks amendment to all elements of the PDP reliant on population growth figures to base the growth on an assumption of 28,000 by 2050.
Whole PDP / Whole PDP / Whole PDP	Avryl Bramley	202.5	Amend	<p>Considers that the PDP's assumption of 50,000 - 80,000 population increase by 2050 is incorrect and is more likely to be 28,000.</p> <p>A number of issues are raised regarding whether:</p> <ul style="list-style-type: none"> - this figure been subjected to, or does the possibility exist of, bias, manipulation, control or corruption by parties who stand to benefit from the extreme intensification whilst possibly bearing few of the costs. - extreme intensification, particularly in multi story residential, would result in sale to non residents and an increase in "nobody home " buildings as seen overseas. - the figure would enable a large part of the dwellings in the city to fall under the control of the "corporate landlord" with the downstream negative effects of monopoly rents or use as de-facto hotels like Berlin. - independent arms length increases were not used as per Statistics NZ, - how this proposed level of population increase can be seen as filling any green objectives whatsoever. - how this serves and embraces TOW principles and needs, - how democratic is it for one set of Councillors in a single 3 year term to set such a high track for a horizon of 30 years and 10 future councils. <p>[Refer to original submission for full reason]</p>	Seeks that any intensification through the district plan only accounts for population increase over the lifespan of the PDP (10 - 15 years).
Whole PDP / Whole PDP / Whole PDP	Avryl Bramley	202.6	Amend	<p>Considers that Wellington has many natural hazards and that intensification beyond 1 - 2 stories is a bad idea because of this.</p> <p>[Refer to original submission for full reason]</p>	Seeks the removal of any clauses or zoning that increase intensification beyond 1-2 low rise stories.
Whole PDP / Whole PDP / Whole PDP	Avryl Bramley	202.7	Amend	<p>Considers the current national legislation banning sales of residential standalone dwellings.</p> <p>[Refer to original submission for full reason]</p>	Seeks the addition of provisions banning the sale of any multi level dwelling or residence to non residents owners.
Whole PDP / Whole PDP / Whole PDP	Halfway House Heritage Gardeners	203.1	Amend	<p>Considers that the application of a recession plane standard to sites adjoining scheduled heritage will to some extent avoid the adverse effects of visual dominance which can arise when new buildings are out of scale with the existing environment [Refer to original submission for full reason].</p>	Seeks that all sites adjoining a scheduled historic heritage item or scheduled historic heritage site/building or Historic Reserve should be subject to the Height In Relation To Boundaries (HIRB) variation of 3 metres and 45 degrees.

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Whole PDP / Whole PDP / Whole PDP	Graham Spargo	211.1	Amend	<p>Considers that Councillors face exposure to liability under section 43 (1) (a) of the Local Government Act due to decisions made on housing density.</p> <p>Considers that the evaluation process for the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 was poor and that Councillors have a responsibility to consider that.</p> <p>Considers that Councillors owe a duty of care to be fully informed as to foreseeable consequences of implementing '3 stories, 50% coverage' provisions in the PDP. This will lead to property market decline, and therefore exposure to liability under section 43 (1) (a).</p> <p>[Refer to original submission for full reason]</p>	Seeks the removal of "3 storey, 50% site coverage everywhere" provisions in the PDP.
Whole PDP / Whole PDP / Whole PDP	Graham Spargo	211.2	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks the addition of good planning practice assessments based on infrastructure availability, built form character and heritage, and walkability and other established 'good practice' ways of determining appropriate locations for intensification.
Whole PDP / Whole PDP / Whole PDP	Glen Scanlon	212.2	Support	<p>Supports solutions to create more affordable housing.</p> <p>Considers the continued, sustainable, growth of our city is vitally important to the well-being of residents.</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Glen Scanlon	212.3	Amend	<p>Considers that retaining sunlight hour provisions from the operative district plan design guide will help ensure dry homes and a reasonable healthy quality of life for all.</p> <p>Sunlight is important to mental health</p> <p>Auckland's design rules also support maintaining and creating living environments where sunlight is maximised</p> <p>[Refer to original submission for full reason]</p>	Seeks that the proposed district plan retains the provisions for sunlight hours from the operative district plan design guides.
Whole PDP / Whole PDP / Whole PDP	Glen Scanlon	212.4	Amend	<p>Considers that construction of large buildings would require purchasing many properties in the area with major earthworks to provide suitable platforms. The costs will be high, infrastructure will be under pressure and it's a high wind zone - the PDP does not account for these. As a result, properties will be expensive and will result in renters moving out.</p> <p>[Refer to original submission for full reason]</p>	Seeks that the plan focuses building more where building platforms are larger, flatter, have access to more parking, public services, and infrastructure such as Kent and Cambridge Terraces, Hania St and Adelaide Rd.
Whole PDP / Whole PDP / Whole PDP	Robert Murray	213.2	Oppose	<p>Opposes the entire PDP and its principles.</p> <p>Considers that it's too long, over-complicated, and unintelligible. It leaves decisions upon unelected officials and the technology used is for experts which still gets it wrong.</p> <p>[Refer to original submission for further reason]</p>	Seeks that the entire PDP is rewritten so that it's clear and intelligible to the average person.
Whole PDP / Whole PDP / Whole PDP	Robert Murray	213.3	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the PDP provides rules rather than guidelines that comply with and support Councils principles.
Whole PDP / Whole PDP / Whole PDP	Robert Murray	213.4	Oppose	[No specific reason given beyond decision requested - refer to original submission]	Seeks that Council should provide services to the public first and put customer/user first.
Whole PDP / Whole PDP / Whole PDP	Robert Murray	213.5	Not specified	<p>Considers there is no housing shortage, it is a shortage of affordable housing.</p> <p>[Refer to original submission for full reason]</p>	Not specified.

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Eva Brodie	217.1	Amend	<p>Considers that placement of even one tall building in this neighbourhood would degrade surrounding homes.</p> <p>A non-compliant development has become compliant under the PDP which will severely impact sunlight on the submitters home, which is counterintuitive given New Zealand's push for healthier homes.</p> <p>It does not make sense that a single dwelling can be allowed to have such a devastating impact on surrounding homes.</p> <p>Developments built to the edge of zones in the HRZ (High Density Residential Zone) in Lower Kelburn will mean losses of privacy, sun, views, and access.</p>	Seeks that the plan is amended to put more emphasis on protecting neighbours sun access.
Whole PDP / Whole PDP / Whole PDP	Tyers Stream Group	221.5	Support	Considers that public access can lead to greater cognisance and care of areas by the public, and in the case of Tyers Stream Reserve result in greater restoration of natural biodiversity and reduction of damaging events, in line with the Reserve's SNA status.	Seeks that the plan provide for public access to and within areas for which WCC has jurisdiction.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.1	Support	[No specific reason given beyond decision requested - refer to original submission]	Supports any provision that will help support actions to minimise the damage caused by climate change and help reduce emissions that are causing climate change.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.2	Not specified	Supports more intense housing development that is linked to public transport and close to facilities such as schools, libraries and shops, to reduce reliance of private cars.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.3	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks addition of a 30-40% permeability standard for all sites.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.4	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks addition of a requirement for shared mini-parks and other forms of green spaces.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.5	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks addition of a requirement for consideration of waste management to be factored into planning.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.6	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks addition of a requirement for consideration of disability access to be factored into planning.
Whole PDP / Whole PDP / Whole PDP	Anna Jackson	222.7	Amend	Considers that parking and road congestion as best managed by the provision of reliable and frequent public transport, preferably free but certainly subsidised and as cheap as possible.	Seeks that mini-buses are added to serve a greater number of routes more frequently.
Whole PDP / Whole PDP / Whole PDP	Nick Humphries	223.1	Amend	<p>Considers the approach taken by Auckland City Council to provide more qualifying matters to provide greater protection of heritage/character/townscape and amenity values.</p> <p>[Refer to original submission for full reason]</p>	Seeks the addition of more qualifying matters regarding heritage/character/townscape and amenity values.
Whole PDP / Whole PDP / Whole PDP	RR Ventures (2018) Ltd	227.1	Amend	Considers that the population in Northern suburbs is increasing consistently and has been earmarked for medium-density housing, we would like to understand Council's plans for further development of Glanmire Road. We are keen to work with the Council to understand the options that present an approach/ solution that is mutually beneficial for the development of this section.	Clarify intent of future development in Glanmire Road.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.1	Amend	The heritage and culture of the urban landscape contributes to everyone's overall wellbeing and quality of life	<p>Add a new objective as follows:</p> <p><u>Reflect the essential contributions made by heritage, character and quality design, giving us the ability to remember our heritage and to visually enjoy unique urban landscapes which provide character and a sense of belonging to our unique city.</u></p>

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.2	Amend	[No specific reason given beyond decision requested - refer to original submission]	Add a new objective as follows: <u>Recognise the essential value of local residents' participation in planning decisions as central to our communities' wellbeing.</u>
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.3	Amend	Considers that the detailed provisions of the PDP should be evaluated against the newly suggested objectives to ensure that the Council's chosen methods are the best options to deliver the objectives of the plan and respect the wishes of the people of Wellington..	Seeks that the PDP is evaluated against the newly suggested objectives.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.4	Amend	Considers that many sites that sit idle or under utilised business facilities. Development in these spaces will address much of future housing demand and avoid adverse effects on quality, amenity and character. [Refer to original submission for full reason]	Seeks that the sequence of intensification in the Proposed District Plan focus first on major areas of under utilised land and smaller groups of under utilised sites close to public transport.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.5	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the Proposed District Plan identify community-based planning for intensification as a method for increasing housing supply within areas subject to the revised demolition controls.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.6	Amend	Considers that homes should be a warm, dry places of stability, where sunlight providing natural light and mood enhancing benefits are recognized as essential to human wellbeing.	Seeks that the Proposed District Plan recognise the critical importance of sunlight to the wellbeing of residents.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.7	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the Proposed District Plan ensure that current well-functioning established homes, neighbourhoods, old trees and plantings are not demolished.
Whole PDP / Whole PDP / Whole PDP	Lorraine and Richard Smith	230.8	Support	Supports the aim of the council to provide for a greater density of population in Central Wellington.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Richard W Keller	232.3	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks amendment to council's Network Operating Framework, Parking Policies, street maintenance systems and so forth that actively support the better places created by more density done well and proximity to daily amenities.
Whole PDP / Whole PDP / Whole PDP	Richard W Keller	232.4	Amend	Considers that people shouldn't need to drive to stations and use Park n Rides.	Seeks that the Proposed District Plan prioritises active and sustainable travel.
Whole PDP / Whole PDP / Whole PDP	Richard W Keller	232.5	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the Proposed District Plan prioritises universal accessibility.
Whole PDP / Whole PDP / Whole PDP	Wellington's Character Charitable Trust	233.3	Amend	Considers that the PDP needs to enable mixed use in more areas so that people can access more services by walking. Considers that the Vogeltown, Mornington, Kingston and Brooklyn suburbs lack suitable shops, supermarkets and restaurants.	Seeks that more mixed-use development is enabled in Vogeltown, Mornington, Kingston and Brooklyn
Whole PDP / Whole PDP / Whole PDP	Go Media Ltd	236.1	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the PDP is amended to give effect to any other elements of the submission that were not directly captured under their submission points.
Whole PDP / Whole PDP / Whole PDP	Regan Dooley	239.3	Support	Supports greater density city-wide generally.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Regan Dooley	239.4	Amend	Considers that the PDP has too many protections for heritage and character generally.	Seeks that the Proposed District Plan is amended to reduce character protection to enable more intensification. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	Regan Dooley	239.5	Amend	Considers that the PDP has too many protections for heritage and character generally.	Seeks that the Proposed District Plan is amended to reduce heritage protection to enable more intensification. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.3	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the Proposed District Plan include an objective recognising the positive value of participation in decisions on an ongoing basis, and acknowledge that this is central to communities being able to meet their needs on an ongoing basis.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.4	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the Proposed District Plan include an objective reflecting the positive contributions heritage, character and quality design, and the ability to read stories in the urban landscape, make to overall wellbeing.
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.5	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the detailed provisions of the District Plan be more rigorously tested against the objectives to ensure that chosen methods are the best options to deliver on the objectives of the Plan.
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.6	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the District Plan sets out a clear sequence for intensification that aligns with the sequence set out in the Spatial Plan.
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.7	Amend	Considers that given the opportunity, Wellingtonians will relish the challenge of working together which can create a sense of community, enhance democracy and deliver change in ways that build on community strengths. Imposing arbitrary change when better options exist simply fosters local resentment. [Refer to original submission for full reasons].	Seeks that the District Plan identify communities to participate in community-based planning.
Whole PDP / Whole PDP / Whole PDP	Alan Fairless	242.8	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the District Plan increase the extent of new green space.
Whole PDP / Whole PDP / Whole PDP	Peter Charlesworth	248.1	Support in part	Generally supports the PDP, including the rezoning from Rural Area to Large Lot Residential Zone at 11B Wilmshurst Place, Tawa.	Retain Proposed District Plan notified with amendments.
Whole PDP / Whole PDP / Whole PDP	Generation Zero Inc	254.4	Support	Considers that housing is not adequate if it does not respect and take into account the expression of cultural identity. Considers that the Proposed District Plan needs to support the development of papakāinga and culturally adequate housing for Māori. Considers that under Local Governments obligations to Te Tiriti and delivering the right to a decent home, Councils must provide effective regulation to stop private enterprises from developing Māori land without free, prior and informed consent of mana whenua. [see original submission]	Seeks that the Proposed District Plan supports the development of papakāinga and culturally adequate housing for Māori. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	Generation Zero Inc	254.5	Support	Considers that the Proposed District Plan needs to support the development of adequate housing through densification and supporting infrastructure for the wellbeing of everyone in the Wellington City Council area and to deliver the right to a decent home. [see original submission]	Seeks that the plan support the development of adequate housing through densification and supporting infrastructure.
Whole PDP / Whole PDP / Whole PDP	Pauletta Wilson	257.1	Support	Supports more housing in Mount Cook but wants to see it done without loss of character and diversity.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Jim & Christine Seymour	262.3	Not specified	Supports more affordable and dense housing in central city areas but not at the risk of losing established character areas.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Jim & Christine Seymour	262.4	Amend	Considers that mistakes have been made regarding design of buildings in the past - for example the Copthorne Hotel and Bay Plaza. Considers a design control process could prevent badly designed buildings from being built and to ensure a sustainable and enjoyable place to live.	Seeks the addition of an effective design control process for the district plan implementation.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Dean Knight and Alan Wendt	265.1	Amend	<p>Considers that when Salisbury Garden Court was listed as a heritage area, at the initiative of owners and residents, the key heritage feature sought to be protected was historic connectedness.</p> <p>The heritage controls imposed are, in practice, too heavy and go well beyond what is sought to be protected.</p> <p>[Refer to original submission for full reason]</p>	Seeks that Item 24 (Salisbury Garden Court) of SCHED3 - Heritage Areas is exempt from any other controls arising from Heritage Area status.
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.1	Amend	Considers there are numbering errors and minor spelling errors that need to be resolved. This includes consistent use of numbering throughout plan i.e. matters of discretion use: a, b, c or i, ii, iii (as per the National Planning Standards).	Seeks that consequential amendments are made to resolve numbering and minor spelling errors.
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.2	Amend	Considers consequential numbering changes need to be made for all inserted or deleted provisions.	Seeks that consequential renumbering changes are made for all inserted or deleted provisions.
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.3	Amend	Considers that references to Mākara throughout the PDP are missing the macron above the 'a'.	Seeks to amend all references of 'Makara' to 'Mākara'.
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.4	Amend	Considers that references to 'dwelling' throughout the PDP should be changed to 'residential unit' as residential unit is defined, whereas dwelling is not.	Seeks to amend all references of 'dwelling' to 'residential unit'.
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.5	Amend	Considers there are several words that are underline (i.e. have definitions) in the PDP but the link does not work (i.e. the definition pop-up does not appear).	<p>Amend the definition links so that the definition pop-up appears when the word is clicked for the following definitions throughout the ePlan:</p> <ul style="list-style-type: none"> - Community Scale Natural Hazard Mitigation Structures - Customer Connection - Cut Height - Demolition - LAF(Max) - National Grid - National Grid Yard - Natural Hazard Mitigation Works - Trenching
Whole PDP / Whole PDP / Whole PDP	Wellington City Council	266.6	Amend	Considers there are several definitions where the words in the PDP do not have a link (i.e. are not underlined) to click to see the definition pop-up.	<p>Amend PDP by adding a definition link for the following words throughout the ePlan:</p> <ul style="list-style-type: none"> - Architectural Feature - Design Speed - Environment - K Value - LA90 - Marina Facilities - R Value - Radiocommunication - Reclamation - Temporary Sign - Wetland
Whole PDP / Whole PDP / Whole PDP	Horokiwi Quarries Ltd	271.2	Not specified	Considers that quarrying activities (outside the Special Purpose Quarry Zone) have a challenging role in the PDP. Despite their resource dependence and functional constraints, that they are essential to enabling the growth the city and enabling the construction of key infrastructure (such as providing material for cycleways and road, fill material for the repair and maintenance of three waters infrastructure), and they provide essential construction material for new dwellings, they are not recognised as 'Infrastructure' within the PDP. Concerns as to the lack of recognition (in particular policy recognition) of quarry activities within the PDP outside the Special Purpose Quarry Zone.	Not specified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Horokiwi Quarries Ltd	271.3	Amend	Considers that there is currently no plan wide recognition of the need and benefits of quarrying activities. While the General Rural zone provides one specific policy (GRUZ-P6), it relates to effects as opposed to the benefits of quarry activities and therefore is limited in its scope. While the Special Purpose Quarry Zone has a policy (and rule) framework it relates to existing quarry sites within the Special Purpose Quarry Zone only and does not have plan wide application, including for any expansion of existing quarries outside the Quarry Zone. Horokiwi suggests that the most logical place for some form of plan wide recognition of quarrying activities would be within the Infrastructure Chapter. However, it is recognised the quarries are not infrastructure as defined in the PDP. As such, as an alternative Horokiwi would support the policy recognition in other parts of the PDP (outside the Special Purpose Quarry Zone). Two policies are suggested. One relating to benefits and the other to functional constraints noting quarries are ultimately resource dependent and therefore their potential location is constrained.	Add a new policy within the PDP (outside the Special Purpose Quarry Zone) as follows: <u>The benefits of quarrying activities to the city and region are recognised and provided for.</u>
Whole PDP / Whole PDP / Whole PDP	Horokiwi Quarries Ltd	271.4	Amend	Considers that there is currently no plan wide recognition of the need and benefits of quarrying activities. While the General Rural zone provides one specific policy (GRUZ-P6), it relates to effects as opposed to the benefits of quarry activities and therefore is limited in its scope. While the Special Purpose Quarry Zone has a policy (and rule) framework it relates to existing quarry sites within the Special Purpose Quarry Zone only and does not have plan wide application, including for any expansion of existing quarries outside the Quarry Zone. Horokiwi suggests that the most logical place for some form of plan wide recognition of quarrying activities would be within the Infrastructure Chapter. However, it is recognised the quarries are not infrastructure as defined in the PDP. As such, as an alternative Horokiwi would support the policy recognition in other parts of the PDP (outside the Special Purpose Quarry Zone). Two policies are suggested. One relating to benefits and the other to functional constraints noting quarries are ultimately resource dependent and therefore their potential location is constrained.	Add new policy within the PDP (outside the Special Purpose Quarry Zone) as follows: <u>When assessing quarrying activities, provide for their functional needs and operational needs, and have regard to their functional constraints.</u>
Whole PDP / Whole PDP / Whole PDP	Fire and Emergency New Zealand	273.2	Not specified	Considers that the PDP needs to adequately give appropriate consideration to fire safety and operational firefighting requirements, particularly in relation to housing development and fire station development, including: - adequate access and water supply for new developments and subdivisions to ensure the submitter can efficiently and effectively respond to emergencies; and - the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies; and - the ability to undertake training for firefighters within the region.	Not specified.
Whole PDP / Whole PDP / Whole PDP	McDonald's	274.1	Oppose	McDonald's is opposed to the 'City Outcomes Contributions' provisions and considers that developments that breach height standards should instead be considered on their merits and effects. The merits of a proposal should not be confined to a specified and required list.	Remove all references to the City Outcomes Contributions be removed from the Proposed District Plan.
Whole PDP / Whole PDP / Whole PDP	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.2	Amend	Considers that the level of high density development in Newtown is inappropriate because of the constraint around the Three Waters. Considers that the upgrading of Wellingtons Three Water infrastructure has not kept up with demand and levels of service have reduced. Newtown in particular has high need for network upgrades and investment into Three Waters. [Refer to original submission for full reason]	Seeks that the level of high density development of Newtown be reduced.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Phillippa O'Connor	289.1	Support	Supports overall strategy and intention of PDP to intensify development within the City.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Kilmarston Developments Limited and Kilmarston Properties Limited	290.1	Support in part	Supports (in general) the Proposed District Plan as it provides for an appropriate residential and open space outcome for the land owned by the submitter - being 16 Patna Street, 109A Awarua Street and 76 Silverstream Road, Ngaio.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Kilmarston Developments Limited and Kilmarston Properties Limited	290.2	Oppose in part	Considers that the proposed natural environment values will place restrictions on the future use and development of the residential land within the Kilmarston block which will result in restrictive (potentially uncertain) development potential of the land for the following reasons: 1. Identification of the whole application site as being within a Special Amenity Landscapes (SCHED11) (SAL); and 2. Identification of the balance land as being within the Natural Open Space Zone without agreement being reached with the Submitter on the appropriate tenure of the land; 3. Failure to provide for infrastructure within the Natural Open Space Zone (i.e. Original reservoir that was included as part of the original zoning).	Not specified.
Whole PDP / Whole PDP / Whole PDP	Tawa Community Board	294.3	Support	Supports initiatives in the plan to benefit urban intensification, both in the CBD and in Tawa.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Tawa Community Board	294.4	Support	Supports the PDP's requirements for hydraulic neutrality.	Retain all provisions relating to Hydraulic Neutrality as notified.
Whole PDP / Whole PDP / Whole PDP	Johanna Carter	296.1	Not specified	Considers that the PDP generally aligns with the proposed RPS direction, despite being notified before this. [Refer to submission for commentary relating to the RPS]	Not specified.
Whole PDP / Whole PDP / Whole PDP	Wellington Branch NZIA	301.1	Support in part	Supports the objective of the PDP to provide greater density, but not at the expense of quality control.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Paihikara Ki Pōneke Cycle Wellington	302.1	Support in part	Supports the PDP subject to amendments to ensure that cycling facilities are provided and enabled in a way the improves safety and accessibility.	Retain the PDP, subject to amendments that ensure cycling facilities are provided and enabled in a way the improves safety and accessibility.
Whole PDP / Whole PDP / Whole PDP	Paihikara Ki Pōneke Cycle Wellington	302.2	Support in part	Supports the PDP subject to amendments to ensure that the intensification outcomes required by the Resource Management Act 1991, as amended by the RM (Enabling Housing Supply and Other Matters) Act 2021 and the NPS-UD 2020 are enabled.	Retain the PDP, subject to amendments that ensure the intensification outcomes required by the Resource Management Act 1991, as amended by the RM (Enabling Housing Supply and Other Matters) Act 2021 and the NPS-UD 2020 are enabled.
Whole PDP / Whole PDP / Whole PDP	Aggregate and Quarry Association	303.2	Not specified	Considers that aggregate is essential for the construction sector, for housing and transport infrastructure and for climate change adaptation.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Aggregate and Quarry Association	303.3	Not specified	Considers that it is important that the PDP does not shut off access to potential aggregate sources to provide for Wellington's current and future construction needs. As aggregate is expensive to transport, sources of this need to be close to the place of construction.	Seeks that the Proposed District Plan identifies where rock for aggregate is located and protects those areas from other development and alternative land uses.
Whole PDP / Whole PDP / Whole PDP	Aggregate and Quarry Association	303.4	Support in part	Considers that while the provisions in the Special Purpose Quarry Zone are appropriate as they are enabling of quarry activities, there are some potential conflicts with other parts of the PDP.	Seeks a statement that where conflicts between the Special Purpose Quarry Zone provisions and other Proposed District Plan provisions occur, the Special Purpose Quarry Zone provisions prevail.
Whole PDP / Whole PDP / Whole PDP	Firstgas Limited	304.2	Not specified	The PDP needs to give effect to the RPS- Wellington Region, in particular Objective 10 and policies 7, 8 and 39.	Clarify that the Proposed District Plan gives effect to Objective 10 and policies 7, 8 and 10 of the Regional Policy Statement.

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Firstgas Limited	304.3	Not specified	<p>Considers the Proposed District Plan should:</p> <ul style="list-style-type: none"> - Recognise and provide for the Gas Transmission Network to be safely, effectively and efficiently operated, maintained, replaced, upgraded, removed and developed through more enabling activity statuses where effects are acceptable; - Recognise the Gas Transmission Network as having functional and operational requirements and constraints, including in respect of its location; - Recognise that on some occasions works involving the Gas Transmission Network will have adverse effects; - Ensure that adverse effects of third-party development or activities in close proximity to the Gas Transmission Network are managed to the extent that adverse effects on the network are avoided or appropriately mitigated. 	Not specified.
Whole PDP / Whole PDP / Whole PDP	Firstgas Limited	304.4	Not specified	<p>Considers the Proposed District Plan should identify First Gas an affected party in the event that resource consent is required in respect of potential effects on assets owned and operated by First Gas, especially land use changes and subdivision.</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Roland Sapsford	305.5	Amend	<p>Considers that the District Plan should focus its action on climate change by applying targeted and focal intensification to create local nodes or “urban villages” rather than broad brush intensification or intensification focussed in already dense areas.</p> <p>Considers that Emission reduction through intensification occurs largely through changes in the ways and distances people travel. Intensifying already dense areas has little effect on emissions. Rather it is modest changes in focal density in lower density areas that has the most impact.</p>	Seeks that the District Plan be amended to focus on reducing existing emissions through focal intensification and the creation of nodes or “urban villages” in areas of relatively low density, rather than simply a broad brush approach to intensification.
Whole PDP / Whole PDP / Whole PDP	Roland Sapsford	305.6	Amend	<p>Considers that light is fundamental to wellbeing and the ability of people and communities to provide for their needs, and has concerns about reduction in sunlight.</p> <p>Is concerned that removing the ability to address sun and shading issues on a site-specific basis will pose a risk to existing housing stock, as new houses positioned to maximise solar access will shade established houses.</p> <p>Notes that reduction in sunlight can affect heating and lighting costs and mental wellbeing</p> <p>Considers that houses built 100years ago rely on sunlight access to keep them in good condition.</p> <p>Considers that a resource consent is a necessary means of assessing sunlight access in Aro Valley.</p> <p>Considers that only one six storey building in an inappropriate location in Aro valley could result in widespread shading effects]</p> <p>[Refer to original submission for details]</p>	Seeks that the plan is amended to address sunlight and shading with particular reference to Aro Valley.
Whole PDP / Whole PDP / Whole PDP	Roland Sapsford	305.7	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that the PDP be amended to recognise that character is in part derived from heritage (as set out in the Operative Plan) in pre-1930s character areas (as defined in the Operative Plan), and use a comprehensive, holistic definition of character as a qualifying matter under the National Policy Statement-Urban Development.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	New Zealand Motor Caravan Association	314.1	Amend	Considers that the importance of camping should be explicitly recognised in the PDP, in line with Section 5 of the Resource Management Act 1991. In particular, camping enables people and communities to provide for their social, economic, and cultural well-being. Refer to original submission for full reasons.	Seeks that camping be recognised in the Proposed District Plan as an important activity.
Whole PDP / Whole PDP / Whole PDP	New Zealand Motor Caravan Association	314.2	Amend	Considers that the PDP should explicitly exempt freedom camping in all zones to ensure that this is not inadvertently caught by 'catch-all rules', for example NOSZ-R11. Considers freedom camping should instead be managed through the Council's bylaw.	Seeks an exemption for freedom camping in the Proposed District Plan on the basis that this is dealt with through the Council bylaw(s).
Whole PDP / Whole PDP / Whole PDP	Bruce Crothers	319.3	Amend	Supports G99 to G102 (external bike storage) and considers that these should be carried into the PDP rules, policies and objectives.	Seeks that the content of G99 to G102 (external bike storage) is carried into the rules, policies and objectives.
Whole PDP / Whole PDP / Whole PDP	Bruce Crothers	319.4	Not specified	Supports walking for transport via tracks through green spaces via tracks through green spaces and interconnection to form a network	Not specified.
Whole PDP / Whole PDP / Whole PDP	Hilary Watson	321.5	Support	Supports increasing housing and housing density as long as they are situated in places that are suitable and aligned with the Strategic Direction of the PDP.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Hilary Watson	321.6	Support	Supports well-designed multi-unit developments as long as they are situated in places that are suitable and aligned with the Strategic Direction of the PDP.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Richard Murcott	322.4	Not specified	Considers that Council should recognise the value of the inner city suburbs which has been achieved through the two decades of Operative District Plan, rather than jeopardising the gains in these relatively small enclaves of the city.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Joan Fitzgerald	323.1	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that G99-102 (External bike storage) of the Residential Design Guide be referenced in the specific rules, policies and objectives.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.7	Amend	Considers that the plan leaves much of the city's environment vulnerable to demolition with no guarantee of quality and /or affordable development in its place.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.8	Amend	Considers that investing in the infrastructure and open space improvements are great ideas. We'd like to see this activity extended to all suburbs, and not limited to Mt Cook and Newtown only.	Seeks more infrastructure and open space improvements in all suburbs.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.9	Amend	Considers that rules and guidance to ensure density is done well must be embedded into the District Plan before removal of the pre-1930s rule. The status quo around design rules is not working well, with too much discretion allowed. Council officers need unambiguous design rules to guide them around Density Done Well, but currently suffer from the lack of them – there is enormous community interest in being part of the development of design rules that will guide building in our city.	Seeks more rules on design density.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.10	Amend	Considers that community involvement is essential to bring about quality development that supports people to live well and thrive.	Seeks that the community be engaged in any and all co-design activities.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.11	Support	Considers that active street frontages should be part of the district plan. Active frontages area a better use of ground floors and street front boundaries, as they allow for small business on the street to provide opportunities for community connection.	Supports active frontages in the district plan.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.12	Not specified	Considers that the viewshaft from Matairangi Mt Victoria over the city towards Te Ahumairangi, Brooklyn and Mt Albert will be greatly diminished if the building heights are realised at the levels imagined in the proposed District Plan. There have already been a number of encroachments on the Matairangi Mt Victoria town belt to support private development.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.13	Not specified.	Considers that the PDP should lay out a path to affordability of housing. Land values in Mt Victoria are too inflated for private developers to provide affordable and/or social housing. Commitment to partnerships from the government and Council needs to be in place before any change can happen.	Seeks that the District Plan lay out a path to affordable housing.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.14	Not specified.	Considers that the PDP encourages gentrification and the imminent moving on of more vulnerable residents from Mt Victoria. Removal of the pre-1930s rule will only speed that up, as more land under older rental properties is made available for development.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.15	Amend	Considers that the plan should account for the impacts of population growth in schools, hospitals and hospices. It likely many schools are overcrowded, such as Clyde Quay School.	Seeks that the impacts of population growth on schools, hospitals and hospices be taken into account.
Whole PDP / Whole PDP / Whole PDP	Mt Victoria Residents' Association	342.16	Amend	Considers that the plan should account for the impacts of development surrounding schools, hospitals and hospices on access to sunlight and warmth.	Seeks that access to sunlight and warmth in schools, hospitals and hospice be protected from neighbouring tall developments.
Whole PDP / Whole PDP / Whole PDP	Carolyn Stephens	344.2	Amend	Considers that the plan should identify communities which will be involved in community-based planning, based on the sequence set out in the Spatial Plan. [Refer to original submission for full reason]	Seeks that the plan identify communities to participate in community-based planning.
Whole PDP / Whole PDP / Whole PDP	Carolyn Stephens	344.3	Amend	Considers that limited notification should be prioritised in provisions (as opposed to non-notification) in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours. [Refer to original submission for full reason]	Seeks that limited notification provisions be prioritised over non-notification, especially in relation to light, shading, privacy and wind effects.
Whole PDP / Whole PDP / Whole PDP	Carolyn Stephens	344.4	Amend	Considers that the plan should identify key potential actors and development partnerships as a method for achieving an increased rate of development on land that is underutilised. [Refer to original submission for full reason]	Seeks that key potential actors and partnerships to develop underutilised land more efficiently be identified.
Whole PDP / Whole PDP / Whole PDP	Carolyn Stephens	344.5	Amend	Considers that the plan should identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.	Seeks that areas suitable for intensification be identified and that development masterplans be devised.
Whole PDP / Whole PDP / Whole PDP	Carolyn Stephens	344.6	Amend	Considers that the assessment of housing capacity in Wellington needs to be based on a target of realising at least 50% of the development capacity (as measured under the Operative Plan) on underutilised land over the term of the Plan. The Plan needs to include methods to achieve this. [Refer to original submission for full reason]	Seeks that methods be included to better assess housing and development capacity on underutilised land.
Whole PDP / Whole PDP / Whole PDP	Retirement Villages Association of New Zealand Incorporated	350.67	Oppose	Considers that the Residential Design Guide makes no specific reference to retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs)	Opposes the Residential Design Guide and seeks amendment to expressly exclude retirement villages from having to apply the Residential Design Guide.
Whole PDP / Whole PDP / Whole PDP	Retirement Villages Association of New Zealand Incorporated	350.68	Oppose	Considers that the Centres and Mixed Use Design Guide makes no specific reference to retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs)	Opposes the Centres and Mixed Use Design Guide and seeks amendment to expressly exclude retirement villages from having to apply the Centres and Mixed Use Design Guide.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.6	Amend	Inconsistent and incorrect reference to the regional plan.	Seeks to ensure consistent reference to the regional plan throughout. By the time decisions are made on the Proposed District Plan (PDP), the regional plan will be operative so should be referred to as the 'Natural Resources Plan'.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.7	Amend	Inconsistent and incorrect reference to the Regional Policy Statement.	Seeks to ensure consistent reference to, "the Regional Policy Statement for the Wellington Region".
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.8	Amend	Considers that references to the effects management hierarchy in matters of discretion should also extend to the consideration of biodiversity compensation.	Seeks that where the effects management hierarchy is mentioned in matters of discretion, amend to include, "...and where relevant the ability to offset or compensate biodiversity impacts".
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.9	Amend	Considers that the reference to the Subdivision Design Guide is currently only in two places in the Subdivision chapter. The wording 'The matters in the Subdivision Design Guide;' does not require evaluation for consistency with the design guide and could be strengthened. Greater Wellington acknowledges that the design guides use a rating system of importance for different guidelines, but do not Considers that the current wording is strong enough.	Seeks to strengthen reference to Subdivision Design Guide to require consistency with, or appropriate consideration of, its guidelines.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.10	Amend	Considers s that the Residential Design Guide is not referenced in any rules for the High Density Residential Zone and greenfield development areas.	Seeks to ensure that the design guides are included in all necessary rules across chapters.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.11	Amend	Considers that the reference to the Residential Design Guide throughout residential and commercial zone matters of discretion could be strengthened. The wording used in policies, 'Fulfils the intent of the Residential Design Guide...', should be reflected in matters of discretion. The Residential Design Guide provides direction on carbon reduction, urban design, stormwater, ecology, water conservation and freshwater ecosystem health, which are all contribute to achieving the PDP's strategic objectives. The Design Guide's weight as a matter of discretion should therefore reflect this. We acknowledge that the design guides use a rating system of importance for different guidelines, but do not Considers that the current wording is strong enough	Seeks to strengthen reference to Residential Design Guide to require consistency with, or appropriate consideration of, its guidelines.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.12	Amend	Considers that the reference to the Centres and Mixed-Use Design Guide throughout zones does not require evaluation for consistency with the design guide and could be strengthened. The Centres and Mixed-Use Design Guide provides direction on carbon reduction, urban design, stormwater, ecology, water conservation and freshwater ecosystem health, which are all contribute to achieving the PDP's strategic objectives. The Design Guide's weight as a matter of discretion should therefore reflect this. We acknowledge that the design guides use a rating system of importance for different guidelines, but do not Considers that the current wording is strong enough.	Seeks to strengthen reference to Centres and Mixed-Use Design Guide to require consistency with, or appropriate consideration of, its guidelines.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.13	Amend	Considers the reference to the Rural Design Guide could be strengthened in matters of discretion. We acknowledge that the design guides use a rating system of importance for different guidelines, but do not Considers that the current wording is strong enough.	Seeks to strengthen reference to Rural Design Guide to require consistency with, or appropriate consideration of, its guidelines.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.14	Amend	Considers that throughout the plan ECO-P2 is incorrectly referred to, where reference should be made instead to ECO-P1.	Seeks to amend incorrect ECO-P2 (Appropriate vegetation removal in significant natural areas) cross-references to ECO-P1 (Protection of significant natural areas).
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.15	Amend	Considers the earthworks, historic heritage and Sites and Areas of Significance to Māori chapters should recognise the potential for accidental discovery of archaeological sites and wahi tapu and require appropriate consents to include an accidental discovery protocol. This would give effect to Policy 22 of the RPS.	Seeks to amend the PDP to manage the accidental discovery of archaeological sites and wahi tapu to protect historic and cultural values.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.16	Amend	<p>Considers that section 3.5 of the NPS-FM 2020 requires every territorial authority to include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy or mitigate adverse effects of urban development on the health and well-being of water bodies, freshwater ecosystems and receiving environments. Further, local authorities that share jurisdiction over a catchment must co-operate in the integrated management of the effects of land use and development on freshwater.</p> <p>There is mention of achieving Te Mana o Te Wai in the Three Waters chapter, which we support. However, Te Mana o Te Wai is missing from other chapters, with no linkage established to other chapters an activity could have direct effects on water e.g. Infrastructure, Earthworks and Ecosystems and Indigenous Biodiversity. Throughout the plan further provisions are necessary to support the achievement of Te Mana o Te Wai and manage potential effects of activities on water bodies. Policy FW.3 in Proposed RPS Change 1 provides some further direction for district plans that should be considered in drafting the appropriate provisions. This includes methods to manage effects on rivers, lakes, wetlands, springs and riparian margins, including any relevant water quality attribute targets in a regional plan, ecosystem values and drinking water sources.</p> <p>In addition, further consideration of the adequacy of erosion and sediment control policies for the management of sediment-laden water from sites to water bodies; rivers, estuaries and harbours, particularly Te Awarua o Porirua is required.</p>	Seeks to amend the district plan to give effect to Section 3.5 of the NPS-FM, specifically to provide further direction on how activities are to be managed to avoid, remedy or mitigate the adverse effects of urban development on the health and well-being of water bodies.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.17	Amend	Considers that Policy CC.8 in Proposed RPS Change 1 seeks for activities regulated by the District Plan that relates to greenhouse gas emissions, to prioritise achieving a reduction in greenhouse gas emissions over offsetting emissions.	Seeks to identify the type and scale of activities within the PDP to which Policy CC.8 of Proposed RPS Change 1 applies.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.18	Amend	Considers that Policy CC.8 in Proposed RPS Change 1 seeks for activities regulated by the District Plan that relates to greenhouse gas emissions, to prioritise achieving a reduction in greenhouse gas emissions over offsetting emissions.	Seeks to include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions for the identified activities rather than applying emissions offsetting.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.19	Amend	Considers that proposed RPS Change 1 seeks that District Plans provide for these solutions to be part of infrastructure and development planning and design in order to manage issues such as water quality and natural hazard protection and increase resilience against climate change. A number of actions are set out in Policy CC.14 as measures that should be considered and provided for.	Seeks to amend the PDP to more broadly address nature-based solutions and their use not only to manage natural hazard risk but as part of the response to climate change and the effects of climate change. Policy direction and rules should set out a clear preference for implementing nature-based solutions in all infrastructure planning and land use development.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.20	Amend	Considers that natural nature-based solutions already exist and perform functions that support solutions to climate change. These areas are to be mapped by Greater Wellington by June 2024. District Plans should avoid adverse effects on ecosystems providing nature-based solutions to have regard to Policy CC.12 in Proposed RPS Change 1.	Seeks that the PDP should include provisions for recognising the functions of the ecosystems providing nature-based solutions to climate change and avoid adverse effects on functions, including before they are mapped.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.21	Amend	Considers that natural nature-based solutions already exist and perform functions that support solutions to climate change. These areas are to be mapped by Greater Wellington by June 2024. District Plans should avoid adverse effects on ecosystems providing nature-based solutions to have regard to Policy CC.12 in Proposed RPS Change 1.	Seeks that policies should also direct the protection of areas that already perform a function as a nature-based solution, including the many wider benefits these can have.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.22	Amend	Considers that policy CC.4 and CC.14 of Proposed RPS Change 1 seek for actions and initiatives that contribute to climate resilient urban areas to be provided for, with a preference for the use of nature-based solutions. To have regard to these policies, the PDP should contain provisions which seek to improve the climate resilience of urban areas as part of the characteristics and qualities of well functioning urban environments.	Seeks the PDP should include provisions which seek to improve the climate resilience of urban areas through measures identified in Policy CC.14.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.23	Amend	Considers that policy CC.4 and CC.14 of Proposed RPS Change 1 seek for actions and initiatives that contribute to climate resilient urban areas to be provided for, with a preference for the use of nature-based solutions. To have regard to these policies, the PDP should contain provisions which seek to improve the climate resilience of urban areas as part of the characteristics and qualities of well functioning urban environments.	Seeks that new development areas should be required to include actions and initiatives that contribute to the broader climate resilience of the urban area through policies and rules, and the extent to which they do this should be a matter of discretion.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.24	Amend	Considers that both brownfield and greenfield development enabled by the PDP should ensure adequate space for public transport on roads. This includes requiring verandahs and other street frontage structures to be set back from the kerb to allow for sufficient bus accessibility	Seeks to amend transport, subdivision, zone and development area standards and rules as necessary to ensure new brownfield and greenfield development enabled by the PDP provides for sufficient bus accessibility.
Whole PDP / Whole PDP / Whole PDP	Greater Wellington Regional Council	351.25	Amend	The submitter notes that there is no papakāinga chapter, nor are papakāinga activities specifically provided for in the zone chapters. The PDP does not provide for papakāinga on Māori owned land or ancestral land.	Seeks to include a Papakāinga chapter and provide for papakāinga on Māori owned land or ancestral land throughout the zone chapters.
Whole PDP / Whole PDP / Whole PDP	Inner City Wellington	352.1	Not specified	Notes that the Proposed District Plan offers improvements in clarity and consistency over the Operative District Plan.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Wellington Electricity Lines Limited	355.3	Support in part	<p>Considers that the comprehensive District Plan review is very important for network utility operators as land use, housing intensification and subdivision development activities proposed throughout Wellington City, as well as the Governments decarbonisation initiatives, will often instigate customer driven network utility upgrading and development.</p> <p>Notes that the provision of electricity infrastructure is a Part 2 matter as the provision of secure and efficient electricity is fundamental to enabling people and communities to provide for their social, economic and cultural wellbeing.</p> <p>Notes that the overall content of the PDP Infrastructure provisions are well considered, robust and reflect the appropriate context for the safe and secure supply of the District's electricity distribution network.</p>	Seeks some further refinement to the Proposed District Plan to ensure that the document is able to be effectively implemented and understood, as well as to enhance particular provisions in order to provide for the importance of electricity infrastructure.
Whole PDP / Whole PDP / Whole PDP	Wellington Electricity Lines Limited	355.4	Amend	Considers that the definitions of 'Additional Infrastructure' and 'Development Infrastructure' should be given the same level of priority. For instance, Council's 'Development Infrastructure' is routinely dependant on 'Additional Infrastructure' so a balanced level of recognition and provision in the PDP is required.	Seeks that the term 'Additional Infrastructure' is appropriately applied with the same level of priority, purpose and intent as 'Development Infrastructure' throughout the PDP.
Whole PDP / Whole PDP / Whole PDP	Wellington Electricity Lines Limited	355.5	Amend	It is requested that appropriate, alternative, amendments be made to the provisions to give effect to the concerns raised, in the event requested amendments are denied.	Seeks that alternative amendments be made to provisions to give effect to the concerns raised in the Wellington Electricity Lines Limited submission. [Refer to submission 355]

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Woolworths New Zealand	359.1	Amend	<p>Considers that the plan should provide a "centres plus" approach by adopting a more flexible planning regime, rather than the current PDP's direct and control model of setting commercial and land supply use. To support this "centres plus" approach, the activity status of supermarkets (essential services and catalysts for well-functioning urban environments) would be more appropriate as:</p> <ul style="list-style-type: none"> - Permitted in all Centre zones, - Restricted Discretionary in the Mixed-Use Zone, for larger-scale supermarkets; - Discretionary in the General Industrial Zone and General Residential Zone. <p>Currently, the PDP does not enable supermarkets in any zone without resource consent (be it for the activity itself or for the building which would be required to accommodate a supermarket in terms of GFA). This is at odds with both the higher order enabling framework set out in the PDP and the National Policy Statement on Urban Development 2020 ("NPSUD").</p> <p>It is considered that a restricted discretionary activity consent process is sufficient to undertake the assessment required to address the effects of infringements in respect of built form and site layout, without needing a broader fully discretionary approach. This again supports a more efficient consenting process to focus assessment where needed without detracting from an enabling planning framework for appropriate activities in appropriate locations. This approach is elaborated upon in additional submission points.</p> <p>The "centres plus" approach recognises the primacy of centres but also that business activity ought to be enabled in other zones, where appropriate. In particular, this approach recognises that functional need and catchment drivers may dictate the location of supermarket operations, on the fringe, or in some cases, outside of identified centres.</p>	<p>Seeks that a "centres plus" approach is adopted in the Proposed District Plan, so as to provide more flexibility in the planning of supermarkets in Centre Zones, Mixed-Use Zones, General Industrial Zones and General Residential Zones.</p>
Whole PDP / Whole PDP / Whole PDP	Woolworths New Zealand	359.2	Support in part	<p>The PDP is generally supported, subject to changes which will ensure that the PDP is consistent with the stated objectives at regional and national level.</p> <p>The general approach of the PDP is supported, in that it seeks to agglomerate small-scale retail and commercial activities within the various commercial and mixed-use zones – being the Metropolitan Centre zone, the Local Centre zone and the Neighbourhood Centre zone. The Commercial zone and the Mixed-Use zone are intended to complement the hierarchy of centres and provide for activities that are incompatible with other centres-based activities. This is reflected in Objectives CEKP-O2 and CEKP-O3, which are also generally supported.</p>	<p>Supports the Proposed District Plan, subject to amendments.</p>
Whole PDP / Whole PDP / Whole PDP	Woolworths New Zealand	359.3	Oppose in part	<p>Parts of the plan are not supported, as they:</p> <ul style="list-style-type: none"> - lack sufficient evidential justification, particularly in respect of the PDP preceding completion of any Business Land Assessment in respect of demand, supply and forecast growth; - go beyond the stated intent of the PDP in respect of its Strategic Direction and as analysed and supported in the Council's section 32 reports. Rather than resolving a resource management issue for the District in terms of enabling activities in the right locations, the approach taken in the PDP is a direct and control model of setting commercial land supply; - Do not give effect to the NPS-UD, which seeks well-functioning urban environments (Objective 1) through enabling urban environments to develop and change in a responsive manner (Objective 4), and requires provisions that have particular regard to providing choice (Policy 1); - Are inappropriate parts in terms of Sections 32, 74 and 75 of the RMA; - Do not achieve Part 2 of the RMA. 	<p>Opposes parts of the Proposed District Plan on the grounds that they are inadequate, over-reach stated intent, do not give effect to the NPS-UD or do not appropriately respect the Resource Management Act 1991.</p> <p>[Refer to original submission]</p>

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Woolworths New Zealand	359.4	Support in part	<p>Considers that where activities infringe identified standards, a restricted discretionary activity status remains appropriate, rather than defaulting to a more onerous discretionary activity status, where discretion is unfettered in assessment. Restricted discretionary activity status can be accompanied by suitably limited criteria that still ensure an appropriate assessment of effects is undertaken, whilst providing a level of certainty to applicants that where activities are anticipated, such assessments will be rational and streamlined.</p> <p>It is noted that the PDP has generally taken this approach when it comes to standard infringements with the exception of infringing MCZ-R15, NCZ-R13, and LCZ-R13 whereby discretionary activity consent is required if the provision of visible carparks along an active frontage or non-residential activity frontage is proposed. Woolworths considers a restricted discretionary activity status is more appropriate, and specifically with consideration given to operational and functional needs of larger commercial activities like supermarkets. Supermarkets often require car parking to be visible, both from commercial viability perspective but also given the requirements to separate loading and servicing activities from public interfaces. This site layout requires that loading is located to the rear of a store, with the building in front and the entrance accessible and legible from the car park and street frontage. Car parking to the rear removes the ability to keep loading and servicing separate from public areas and leads to safety and CPTED issues after hours. These are examples of operational and functional requirements for supermarkets that are overlooked by application of blanket urban design ideals in these standards.</p>	<p>Seeks that restricted discretionary activity status are retained when activities infringe identified status.</p> <p>[Inferred decision requested]</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.3	Amend	<p>Considers that the PDP should have an objective recognising the positive value of participation in decisions on an ongoing basis, and acknowledge that this is central to communities being able to meet their needs on an ongoing basis.</p>	<p>Seeks that an objective be added regarding the positive value of community participation in decisions.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.4	Amend	<p>Considers that the PDP should have an objective reflecting the positive contributions heritage, character and quality design, and the ability to read stories in the urban landscape, make to overall wellbeing.</p>	<p>Seeks that an objective be added to recognise the positive contributions of heritage, character and quality design to overall wellbeing.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.5	Amend	<p>[No specific reason given beyond decision requested - refer to original submission].</p>	<p>Seeks that the detailed provisions of the District Plan be more rigorously tested against the objectives to ensure that chosen methods are the best options to deliver on the objectives of the Plan.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.6	Amend	<p>Considers that the PDP should set out a clear sequence for intensification, as set out by the Spatial Plan. Zoning should be used appropriately to achieve this, rather than upzoning broad areas of land. The sequence should focus first on major areas of underutilised land and smaller groups of underutilised sites close to public transport. The submitter considers this is because there are many sites throughout the city which sit idle or underutilised and can be utilised for development.</p>	<p>Seeks that a clear sequence for intensification be devised to focus intensification on underutilised land and sites close to public transport.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.7	Amend	<p>Considers that the plan should identify communities which will be involved in community-based planning, based on the sequence set out in the Spatial Plan. [Refer to original submission for full reason]</p>	<p>Seeks that the plan identify communities to participate in community-based planning.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.8	Amend	<p>Considers that limited notification should be prioritised in provisions (as opposed to non-notification) in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours. [Refer to original submission for full reason]</p>	<p>Seeks greater provision for limited notification provisions over non-notification, especially in relation to light, shading, privacy and wind effects.</p>
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.9	Amend	<p>Considers that the plan should identify key potential actors and development partnerships as a method for achieving an increased rate of development on land that is underutilised. [Refer to original submission for full reason]</p>	<p>Seeks that key potential actors and partnerships to develop underutilised land more efficiently be identified.</p>

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.10	Amend	Considers that the plan should identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.	Seeks that areas suitable for intensification be identified and that development masterplans be devised.
Whole PDP / Whole PDP / Whole PDP	Elizabeth Nagel	368.11	Amend	Considers that the assessment of housing capacity in Wellington needs to be based on a target of realising at least 50% of the development capacity (as measured under the Operative Plan) on underutilised land over the term of the Plan. The Plan needs to include methods to achieve this. [Refer to original submission for full reason]	Seeks that methods be included to better assess housing and development capacity on underutilised land.
Whole PDP / Whole PDP / Whole PDP	Jane Szentivanyi and Ben Briggs	369.5	Amend	Considers that the sequencing of development is aligned with increased and improved infrastructure development.	Seeks that development be provided in a sequenced manner.
Whole PDP / Whole PDP / Whole PDP	Waka Kotahi	370.6	Not specified	Considers that adding a note to zones which provide for noise sensitive activities to draw applicants' attention to the reverse sensitivity provisions would be beneficial for aiding public interpretation on the planning provisions that apply. [Applicant was 'neutral' on the provisions].	Add a note in all Zone chapters that provide for noise sensitive activities: <u>Note: As well as provisions in the zone new buildings or alterations to existing buildings for noise sensitive activities are required to comply with the provisions in the NOISE chapter, which include sound insulation as a requirement in certain areas or limiting the establishment of noise sensitive activities in some cases.</u>
Whole PDP / Whole PDP / Whole PDP	WCC Environmental Reference Group	377.1	Support	Overall position is very supportive of the PDP and the progress towards a more liveable and sustainable City.	Not specified.
Whole PDP / Whole PDP / Whole PDP	WCC Environmental Reference Group	377.2	Amend	Considers that the Johnsonville Rail Line should be classified as a rapid transit service. As a permanent transit route capable of large capacity carriage of people, the Johnsonville Rail Line should be classified as a rapid transit service. GWRC's Regional Land Transport Plan 2021 recognises the route as a rapid transit route. The line also fits the definition of a rapid transit route in the NPS-UD definitions for the purpose of giving effect to Policy 3(c). With the suburbs along this line well served by commercial and community facilities, and with land available that could accommodate denser development, it makes no sense for this route not to be classified in this way, and provision made for higher density development. We are facing a climate crisis and a housing crisis: this area must shoulder some of the change necessary to reduce Wellingtonian's carbon footprint, and increase housing availability and affordability along transport routes well served by community facilities, which this is.	Amend the Plan to add to the definitions, schedules, policies, maps, and rules provisions to designate the Johnsonville Rail Line a rapid transit route, and all stops along it, as rapid transit stops. Revise the status of the suburbs it serves, and their zones accordingly, to match the land use density expected of land along such a route, e.g. enabling higher buildings within the walkable catchment.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Southern Cross Healthcare Limited	380.1	Support in part	<p>Considers that hospitals, like residential areas, must intensify and expand; and that the NPS-UD recognises this.</p> <p>Southern Cross supports the PDP in part, but seeks amendments to:</p> <p>(a) provide for well-functioning urban environments, which give effect to the National Policy Statement on Urban Development 2020 (NPS-UD);</p> <p>(b) recognise the role of public and private hospitals as additional infrastructure;</p> <p>(c) enable efficient operation and expansion of hospital activities in the Special Purpose Hospital zone;</p> <p>(d) identify and impose appropriate controls on natural hazard risks; and</p> <p>(e) clarify the application of the sites and areas of significance to Māori provisions.</p> <p>[Refer to cover letter to submission for further details]</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Southern Cross Healthcare Limited	380.2	Oppose in part	<p>Considers that hospitals, like residential areas, must intensify and expand; and that the NPS-UD recognises this.</p> <p>Southern Cross opposes the PDP in part, but seeks amendments to:</p> <p>(a) provide for well-functioning urban environments, which give effect to the National Policy Statement on Urban Development 2020 (NPS-UD);</p> <p>(b) recognise the role of public and private hospitals as additional infrastructure;</p> <p>(c) enable efficient operation and expansion of hospital activities in the Special Purpose Hospital zone;</p> <p>(d) identify and impose appropriate controls on natural hazard risks; and</p> <p>(e) clarify the application of the sites and areas of significance to Māori provisions.</p> <p>[Refer to cover letter to submission for further details]</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Southern Cross Healthcare Limited	380.3	Amend	<p>Considers that of 'Health care facility' and 'Healthcare facility' should be used consistently within the Proposed District Plan</p>	Seeks that either HEALTH CARE FACILITY or HEALTHCARE FACILITY is used consistently in the Proposed District Plan.
Whole PDP / Whole PDP / Whole PDP	Southern Cross Healthcare Limited	380.4	Amend	<p>Seeks for the names of other zones to be stated in full. It is unclear which zone 'HRZ' refers to.</p>	Seeks that names of zones within the Proposed District Plan be represented by their full names, rather than acronyms.
Whole PDP / Whole PDP / Whole PDP	Argosy Property No. 1 Limited	383.1	Oppose	<p>Opposes this policy which requires some developments to deliver City Outcomes Contributions in accordance with the Centres and Mixed Use Design Guide. This is because:</p> <ul style="list-style-type: none"> - This provision elevates what is normally a design guide into a rule. A design guide should be separate to a plan. The Design Guide should be an external document to the District Plan and be referenced as a guide only. - Further, this provision, provides a mechanism for the Council to require these aspects as part of a development. This is inappropriate. A development should be assessed on its merits. 	Delete all references to City Outcomes Contributions in the Proposed Plan.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.1	Oppose in part	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM.</p> <p>For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that “wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction”.</p> <p>Guidance prepared by the Ministry for the Environment² (MfE) specifies that “territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments”.</p>	Opposes in part to the Proposed District Plan in its current form and seeks amendment.
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.2	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM.</p> <p>For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that “wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction”.</p> <p>Guidance prepared by the Ministry for the Environment² (MfE) specifies that “territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments”.</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	Seeks that there are additional objectives, policies, and methods to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments (including wetlands).

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.3	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM.</p> <p>For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that “wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction”.</p> <p>Guidance prepared by the Ministry for the Environment² (MfE) specifies that “territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments”.</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	<p>Seeks that the Council adopts an integrated approach with the Greater Wellington Regional Council (GWRC) in relation to implementing the management of water and land, rather than putting the onus solely on GWRC to implement the NPS-FM.</p>
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.4	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM.</p> <p>For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that “wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction”.</p> <p>Guidance prepared by the Ministry for the Environment² (MfE) specifies that “territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments”.</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	<p>Seeks that the Council work with GWRC to identify any additional sites/areas that should be protected under the Proposed District Plan and RPS in line with the NPS-FM.</p>

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.5	Amend	<p>Considers that the Proposed District Plan does not adequately give effect to the NPS-FM.</p> <p>For example, there is a lack of objectives, policies, and methods that protect wetlands. At feedback stage for the Draft District Plan 2021, the Greater Wellington Regional Council (GWRC) sought a new objective for wetlands to protect waterways and wetlands. The Council rejected this feedback on the basis that “wetlands jurisdiction falls within NPS-FW [NPS-FM] and Greater Wellington Regional Council jurisdiction”.</p> <p>Guidance prepared by the Ministry for the Environment² (MfE) specifies that “territorial authorities must include objectives, policies, and methods in their district plans to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments”.</p> <p>It is noted that MfE requires the Council to notify changes to regional policy statements, regional plans, and district plans to give effect to the new NPS-FM 2020 by 31 December 2024. To avoid an additional plan change, it would be prudent for the Council to incorporate this national direction into the Proposed District Plan.</p>	Seeks that any policy and rules in relation to wetlands are in line with the NZCPS (New Zealand Coastal Policy Statement 2010).
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.6	Amend	<p>Considers that it would be effective and efficient to align the review of the Proposed District Plan provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p> <p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 during the Proposed District Plan further submissions and hearing process.</p>	Seeks that the Council undertakes a review of the NPS-IB exposure draft (or the soon to be gazetted NPS-IB document) to confirm the Proposed District Plan is giving effect to this national direction.
Whole PDP / Whole PDP / Whole PDP	Director-General of Conservation	385.7	Amend	<p>Considers that it would be effective and efficient to align the review of the Proposed District Plan provisions with the policy direction and requirements anticipated under the NPS-IB, to avoid an additional plan change.</p> <p>The NPS-IB currently has no legal effect; however, it is expected to come into effect in December 2022 during the Proposed District Plan further submissions and hearing process.</p>	Seeks that the Proposed District Plan should be updated to give effect to the NPS-IB where required.
Whole PDP / Whole PDP / Whole PDP	Taranaki Whānui ki te Upoko o te Ika	389.7	Not specified	<p>Considers that there are also a number of properties held by Taranaki Whānui via Tai Hekenga and Crown properties that offer significant development potential, including land held by Taranaki Whānui that we have aspirations for future development and consider to be special Māori precincts.</p> <p>[see original submission]</p>	Seeks that Council provide a schedule of proposed zone changes for review and included a full schedule of RFR and DSP properties within Wellington City for reference.
Whole PDP / Whole PDP / Whole PDP	Taranaki Whānui ki te Upoko o te Ika	389.8	Not specified	<p>Considers that there are also a number of properties held by Taranaki Whānui via Tai Hekenga and Crown properties that offer significant development potential, including land held by Taranaki Whānui that we have aspirations for future development and consider to be special Māori precincts.</p> <p>[see original submission]</p>	Seeks that any decisions made in respect of landholdings over which Taranaki Whānui have an interest in, that Taranaki Whānui are consulted first so as to ensure our interests are given due consideration as required under the RMA and in line with their Memorandum of Understanding with Council.
Whole PDP / Whole PDP / Whole PDP	Taranaki Whānui ki te Upoko o te Ika	389.9	Amend	<p>Considers replacing the word 'mauri' with 'mouri'.</p>	Seeks that all references to 'mauri' be removed and replaced with 'mouri'
Whole PDP / Whole PDP / Whole PDP	Taranaki Whānui ki te Upoko o te Ika	389.10	Oppose in part	<p>Opposes Proposed District Plan in general as it fails to provide an adequate planning framework for Papakāinga.</p>	Opposes the Plan in part, with amendments.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Taranaki Whānui ki te Upoko o te Ika	389.11	Amend	Opposes Proposed District Plan in general as it fails to provide an adequate planning framework for Papakāinga.	Seeks that a papakāinga chapter is added.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.4	Support in part	The PDP's approach to implement the NPSUD and the Housing Supply Act by incorporating a Centres hierarchy and intensification provisions is generally supported.	Retain the Proposed District Plan with amendments.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.5	Amend	Considers that all standards should be ensured to have an appropriate activity status and/or are referenced in the building and structure activity rules. For instance, NCZ-R18 does not require compliance with standards NCZ-S7 & NCZ-S8 which relate to residential activities.	Seeks that all standards are ensured to have an appropriate activity status and/or are referenced in the building and structure activity rules.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.6	Support in part	The inclusion of notification preclusions for restricted discretionary activities across the plan are supported, as this creates certainty to the development market. Further amendments are sought.	Supports the preclusion of public notification for activities under Restricted Discretionary status.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.7	Amend	Considers that Public notification preclusions should be included in the PDP where impacts may apply beyond the site being developed such as side yards, height, daylight, coverage.	Seeks that the preclusion of public notification is applied beyond a development site, for breaches such as side yards, height, daylight and coverage.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.8	Amend	Considers that limited notification preclusions should apply where effects are limited to the site being developed, such as outdoor living space infringements.	Seeks that the preclusion of limited notification is applied beyond a development site, for breaches such as outdoor living space infringements.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.9	Oppose	Considers that references to 'reverse sensitivity' as part of adverse effects is unnecessary and should be removed. Reverse sensitivity can be covered by general considerations relating to adverse effects.	Remove any reference to 'reverse sensitivity' from the Plan.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.10	Amend	[No specific reason given beyond decision requested - refer to original submission].	Remove reference of Assisted housing throughout the PDP.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.11	Amend	[No specific reason given beyond decision requested - refer to original submission].	Remove reference of Comprehensive Development throughout the PDP.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.12	Amend	[No specific reason given beyond decision requested - refer to original submission].	Remove reference of Demolition throughout the PDP.
Whole PDP / Whole PDP / Whole PDP	Kāinga Ora Homes and Communities	391.13	Amend	An amendment is sought to delete any references of 'multi-unit housing' in objectives, policies, rules, and standards throughout the District Plan.	Remove reference of Multi-unit housing throughout the PDP.
Whole PDP / Whole PDP / Whole PDP	Matthew Tamati Reweti	394.4	Not specified	Considers that restrictions to building and land use affects Tino Rangatira and so encourages Council to consider this and adopt more flexible planning restrictions. Mana Whenua (Taranaki Whānui, Te Ātiawa) own over \$100M in property within Wellington City.	Seeks that WCC considers that restrictions to building and land use affects Tino Rangatira and adopt more flexible planning restrictions i.e. as flexible as possible.
Whole PDP / Whole PDP / Whole PDP	Ministry of Education	400.2	Amend	Seeks that explicit provision is given to educational facilities throughout the urban environment to enable the submitter to manage the impacts of growth and development on educational facilities, in particular impacts on school capacity. The submitter considers that providing for educational facilities in Wellington through the strategic policy framework will support the provision of new and expansion of existing educational facilities in the Wellington region.	Seeks that educational facilities are enabled as part of urban growth and development and are considered in any zoning changes made.
Whole PDP / Whole PDP / Whole PDP	Oyster Management Limited	404.1	Support in part	Supports the Proposed Plan in part.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.1	Support	Generally supports the aims of the Proposed Plan.	Not specified.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.2	Support	Supports the creation of well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (NPS-UD)).	Not specified.
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.3	Support	Supports the provision of sufficient development capacity to meet long term demands for housing and business land.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.4	Support	Supports the provision of a compact urban form and urban intensification.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.5	Amend	<p>Generally supports the intent and provisions of the design guides. However, considers that it is important that the design guides are reference documents that sit outside of the district plan, rather than being formally incorporated into the district plan. Incorporating the design guides into the district plan elevates these provisions into the form of standards, rather than what they are intended to be as guidance.</p> <p>The Centres and Mixed-Use Design Guide is supported and a helpful tool, however it should be a reference document that sits outside the district plan [Refer to original submission for full reason].</p>	Seeks that the design guides are reference documents that sit outside of the district plan, rather than being formally incorporated into the district plan.
Whole PDP / Whole PDP / Whole PDP	Investore Property Limited	405.6	Amend	Considers that it is not appropriate to provide that the Council's discretion is restricted to all matters in the design guides, for example under Rules CCZ-R19 and CCZ-20. This is because the design guides do not give any clear direction or certainty for applicants, and the submitter considers it would be onerous to potentially address two design guides in the preparation and assessment of resource consent applications.	<p>Seeks that all direct references to the design guides be deleted and replaced with references as appropriate and necessary to the specific design outcomes that are being sought, for example "For guidance, refer to the Centres and Mixed Use Design Guide".</p> <p>[Inferred decision sought].</p>
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.2	Amend	<p>Not opposed to the coastal inundation mapping in principle, however considers further nuancing of the provisions that relate to coastal hazards and more specifically, tsunami hazard, is required.</p> <p>[See paragraphs 4.85 to 4.89 of original submission for full reason]</p>	Opposes the coastal hazard provisions that apply to coastal tsunami hazard overlays.
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.3	Amend	Considers that Wellington International Airport is regionally significant infrastructure. [See original submission for full reason]	Seeks an amendment that appropriately recognises and provides for the Airport to operate in a safe, efficient, and effective manner, whilst ensuring that reverse sensitivity effects are avoided.
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.4	Amend	<p>Considers that Wellington International Airport is regionally significant infrastructure and is important in providing for the social, economic and cultural wellbeing of people and communities.</p> <p>Considers that given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance. So the functional, operational, technical and/or safety related requirements of this infrastructure require appropriate recognition in the Proposed Plan.</p> <p>[See original submission for full reason]</p>	Seeks that the PDP is amended to add functional, operational, technical and/or safety related requirements of this infrastructure.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.5	Amend	<p>Considers that a framework is needed to address the significant social and economic benefits that can accrue from the operation of the regionally significant infrastructure [the airport]. The framework needs to:</p> <ul style="list-style-type: none"> - Recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure; - Protect regionally significant infrastructure from effects of incompatible land use and development, including reverse sensitivity effects; - Manage the effects arising from regionally significant infrastructure, recognising that the operational and/or functional requirements of infrastructure sometimes mean that not all effects can (or should be required to) be avoided, remedied or mitigated. <p>The PDP as notified has complex layering of consent requirements which means the above outcomes are difficult to achieve.</p>	<p>Seeks that further changes are required to the planning framework as it relates to regionally significant infrastructure, to ensure that the framework specified in paragraph 4.14 [and summarised in the reasons column] is achieved.</p> <p>[See paragraphs 4.14, 4.14.1, 4.14.2, and 4.14.3 in the original submission]</p>
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.6	Amend	<p>Considers that Wellington International Airport is regionally significant infrastructure and is important in providing for the social, economic and cultural wellbeing of people and communities.</p> <p>Considers that given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance. So the functional, operational, technical and/or safety related requirements of this infrastructure require appropriate recognition in the Proposed Plan.</p> <p>[See original submission for full reason]</p>	<p>Seeks that the PDP is amended to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure.</p>
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.7	Amend	<p>Considers that Wellington International Airport is regionally significant infrastructure and is important in providing for the social, economic and cultural wellbeing of people and communities.</p> <p>Considers that given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance. So the functional, operational, technical and/or safety related requirements of this infrastructure require appropriate recognition in the Proposed Plan.</p> <p>[See original submission for full reason]</p>	<p>Seeks that the PDP is amended to protect regionally significant infrastructure from effects of incompatible land use and development, including reverse sensitivity effects.</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.8	Amend	<p>Considers that Wellington International Airport is regionally significant infrastructure and is important in providing for the social, economic and cultural wellbeing of people and communities.</p> <p>Considers that given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance. So the functional, operational, technical and/or safety related requirements of this infrastructure require appropriate recognition in the Proposed Plan.</p> <p>[See original submission for full reason]</p>	Seeks that the PDP is amended to manage the effects arising from regionally significant infrastructure, recognising that the operational and/or functional requirements of infrastructure sometimes mean that not all effects can (or should be required to) be avoided, remedied or mitigated.
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.9	Amend	<p>Considers that counter to the intent of the Planning Standards, the Proposed Plan contains a significant degree of repetition. This results in a duplication and layering of planning controls which is inefficient and results in additional resource consent requirements without clear direction around the effects the controls are seeking to manage.</p> <p>Given the change in technology and the change in the air industry that will be required going forward, the submitter notes that change will need to be accommodated within the Airport Zone.</p> <p>[See original submission for full reason]</p>	Seeks that all unnecessary duplication should be removed and each chapter should focus on managing the effects that specifically relate to that chapter and are not otherwise managed by the underlying zone rules.
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.10	Amend	<p>Considers that the Sewall between Lyall Bay and Moa Point is important infrastructure but is not captured within the definition of "Infrastructure" and therefore any maintenance, upgrading, repair, replacement or development of seawall does not engage infrastructure provisions of the PDP but rather the Natural Open Space Zone.</p> <p>Submitter questions the efficiency and effectiveness of the Natural Open Space zoning and the associated planning framework insofar as it relates to this area.</p> <p>[See original submission for full reason]</p>	Seeks that the planning framework, insofar as it relates to the seawall between Lyall Bay and Moa Point, should be updated to enable the ongoing maintenance, repair, upgrading and renewal of the existing seawall where it protects regionally significant infrastructure.
Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.11	Amend	<p>The Civil Aviation Authority of New Zealand ("CAA") produces guidance on land use activities at or near aerodromes.¹⁰ The following activities are of particular concern to Airport Operators where located within close proximity to an airport due to their potential bird attracting properties:</p> <ul style="list-style-type: none"> - Refuse dumps and landfills; - Sewage Treatment and Disposal (outdoor); - Certain agricultural activities (cattle feed lots, pig farming); - Fish Processing; - Artificial and natural lakes/waterbodies; and - Abattoirs and freezing works. 	Seeks that a bespoke framework should be established for refuse dumps and landfills, outdoor sewage treatment and disposal, cattle feed lots, pig farming, fish processing, artificial and natural lakes/waterbodies, and abattoirs and freezing works where located within a fixed distance of the Airport. This framework will ensure a consenting pathway is available that requires appropriate consideration of potential increase in bird strike risk. This should include a narrowly framed restricted discretionary activity that restricts discretion to the potential effects of aircraft safety, including the potential risk of bird strike.

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Wellington International Airport Ltd	406.12	Not specified	<p>Considers that, without the proposed amendments specified within the submitters submission:</p> <ul style="list-style-type: none"> - The Proposed Plan will not promote the sustainable management or efficient use and development of natural and physical resources; - The Proposed Plan is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means; - The Proposed Plan does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of evaluation the costs of implementing the provisions under section 32(2)(a); and - The Proposed Plan does not represent sound resource management practice particularly with respect to planning for Wellington International Airport, as regionally significant infrastructure. 	Not specified.
Whole PDP / Whole PDP / Whole PDP	Cheryl Robilliard	409.5	Support in part	Supports overall direction of the plan	Not specified
Whole PDP / Whole PDP / Whole PDP	VicLabour	414.7	Amend	<p>Considers that the plan lacks a focus on affordable housing.</p> <p>Considers that while supply side interventions are important, there remains an issue of a significant proportion struggling financially because their rents have increased faster than wages for many years and house prices have climbed increasingly out of reach.</p> <p>Considers that while there are risks to overall affordability and supply from imposing a tax on new developments, the revenue raised would be redistributed to affordable housing developments, and these stronger measures would provide a strong incentive to developers to consider modest homes that are more affordablng.</p> <p>[See original submission for full reasons]</p>	Seeks that the Council to revisit including an affordable housing chapter in the plan.
Whole PDP / Whole PDP / Whole PDP	VicLabour	414.8	Amend	<p>Considers that the plan lacks a focus on affordable housing.</p> <p>Considers that while supply side interventions are important, there remains an issue of a significant proportion of struggling financially because their rents have increased faster than wages for many years and house prices have climbed increasingly out of reach.</p> <p>Considers that while there are risks to overall affordability and supply from imposing a tax on new developments, the revenue raised would be redistributed to affordable housing developments, and these stronger measures would provide a strong incentive to developers to consider modest homes that are more affordablng.</p> <p>[See original submission for full reasons]</p>	Seeks that the Council investigate ways to target taxes to avoid mid-range housing as part of an affordable housing scheme.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Willis Bond and Company Limited	416.3	Amend	<p>Submitter considers that there needs to be clearer decision-making processes. Submitter is concerned that the decision-making process for restricted discretionary activities could be convoluted and unnecessarily delay development. This will particularly be the case if the Design Guides are retained as they overlap with the PDP in various areas.</p> <p>We have suggested a 'Design Excellence Panel' be constituted for each significant development and be solely responsible for assessing design outcomes of projects. This has the potential to speed up the process, ensure appropriately qualified people are in the room together to assess applications "in the round" and achieve positive design outcomes for Wellington City. We would welcome exploring other suggestions on how to make the planning process more efficient.</p>	Seeks that a 'Design Excellence Panel' be constituted for each significant development and be solely responsible for assessing design outcomes of projects.
Whole PDP / Whole PDP / Whole PDP	Willis Bond and Company Limited	416.4	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks that the importance of affordability should be acknowledged throughout the Proposed District Plan.
Whole PDP / Whole PDP / Whole PDP	Willis Bond and Company Limited	416.5	Not specified	[No specific reason given beyond decision requested - refer to original submission]	Seeks a thorough review of the City Outcomes Contribution process, to ensure developers receive certainty early on as to the additional height (or floor space) that will apply.
Whole PDP / Whole PDP / Whole PDP	Willis Bond and Company Limited	416.6	Amend	<p>Generally supports the intent of the Design Guides, but opposes their inclusion in the District Plan for the following reasons:</p> <ul style="list-style-type: none"> - In many areas, the Design Guides overlap with the objectives and policies in Part 3. This will cause confusion for both planners and developers in attempting to interpret the Design Guides alongside Part 3. In particular, the submitter queries how the 'Outcomes' in the Design Guides are to be read alongside other provisions in the plan. - It will be simpler to update the Design Guides to reflect best practice if they remain non-statutory. - The way the Design Guides are included as relevant criteria for restricted discretionary activities significantly expands the Council's discretion beyond what could normally be expected, for example, the Residential Design Guide contains various provisions dealing with internal areas such as G114-116 (internal living spaces) and G130-131 (internal storage). 	Seeks that references to the Design Guide in the Proposed District Plan be removed and that the Design Guides should be non-statutory in a similar way to the Auckland Design Manual. They should be used for guidance on how the objectives and policies in Part 3 may be implemented.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.1	Amend	Considers that many sites in the city are under utilised and that filling these gaps will provide for future housing needs without impacting quality, amenity and character.	Seeks that the Proposed District Plan add a clear sequence for intensification, done through zoning. Seeks that it follows the sequence set out in the Spatial Plan and that it focus on major areas of underutilised land and smaller groups of under utilised sites close to public transport.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.2	Amend	<p>Considers that Wellingtonians relish the challenge of working together, and that some suburbs are taking the lead in rethinking their areas. This creates a sense of community and enhances democracy.</p> <p>Supports participatory design projects with clear targets, so communities are involved.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended to identify a sequence of communities which will be involved in community-based planning, based on the sequence set out in the Spatial Plan.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.3	Amend	<p>Considers that Wellingtonians relish the challenge of working together, and that some suburbs are taking the lead in rethinking their areas. This creates a sense of community and enhances democracy.</p> <p>Supports participatory design projects with clear targets, so communities are involved.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended to make greater provision for limited notification (as opposed to non-notification) in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours.

General Point on Whole Proposed District Plan

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Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.4	Amend	<p>Considers that Wellingtonians relish the challenge of working together, and that some suburbs are taking the lead in rethinking their areas. This creates a sense of community and enhances democracy.</p> <p>Supports participatory design projects with clear targets, so communities are involved.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended to make new developments Controlled activities in respect of urban design so as to ensure that quality in design at a local level can be considered for the majority of developments, and that this process is tied to community-level design guides as they are developed.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.5	Amend	<p>Considers that local government, central government, private developers and communities need to work together.</p> <p>Wellington needs innovative models for public and private land investment.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended to identify development partnerships as a method for achieving an increased rate of development on land that is underutilised, and that the Plan also needs to identify the key potential actors.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.6	Amend	<p>Considers that local government, central government, private developers and communities need to work together.</p> <p>Wellington needs innovative models for public and private land investment.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended to identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.7	Amend	<p>Considers that local government, central government, private developers and communities need to work together.</p> <p>Wellington needs innovative models for public and private land investment.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan is amended so that assessment of housing capacity in Wellington needs to be based on a target of realising at least 50% of the development capacity (as measured under the Operative District Plan) on underutilised land over the term of the Proposed District Plan, and needs to include methods to achieve this.
Whole PDP / Whole PDP / Whole PDP	Josephine Smith	419.8	Amend	<p>Considers that Wellingtons livability, character and heritage can be protected at the same time as new housing is added.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan identify community-based planning for intensification as a method for increasing housing supply within areas subject to revised demolition controls.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.1	Amend	<p>Considers that the Proposed District Plan should be amended to prioritise Newtown as a Pilot programme and to identify a sequence of communities which will be involved in a community-based planning, based on the sequence set out in the spatial plan.</p> <p>See original submission has concept designs and 3D models of the proposed community-based planning idea.</p>	Seeks that the Proposed District Plan is amended to prioritise Newtown as a Pilot programme and to identify a sequence of communities which will be involved in a community-based planning, based on the sequence set out in the spatial plan.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.2	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to light so as to enable and support fair and reasonable compromises between neighbours.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.3	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to shading so as to enable and support fair and reasonable compromises between neighbours.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.4	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to privacy so as to enable and support fair and reasonable compromises between neighbours.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.5	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan needs to be amended to make greater provision for limited notification (as opposed to non-notification) in relation to wind effects so as to enable and support fair and reasonable compromises between neighbours.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.6	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan is amended to encompass more new developments as controlled activities in respect of urban design so as to ensure that quality in design at a local level can be considered for the majority of developments, and that this process is tied to community-level design guides as they are developed.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.7	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the Proposed District Plan needs to identify the Newtown Suburban Centre area suitable for intensification and provide a timetable for developing the community-led masterplan for this area, including quality design guides and rapid assessment processes.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.8	Not specified	Supports the Newtown Residents Association submission.	Not specified.
Whole PDP / Whole PDP / Whole PDP	The Urban Activation Lab of Red Design Architects	420.9	Not specified	Supports the submission of LIVE Wellington.	Not specified.
Whole PDP / Whole PDP / Whole PDP	New Zealand Defence Force	423.5	Amend	Considers that NZDF facilities are in many district plans throughout the country (including the Proposed Selwyn District Plan and the Auckland Unitary Plan Operative in Part).	Seeks that any existing and future defence facilities in Wellington City are recognised and provided for in the Proposed District Plan.
Whole PDP / Whole PDP / Whole PDP	Paul Gregory Rutherford	424.7	Amend	<p>Considers that local government, central government agencies, private developers, and communities need to work in partnership not as adversaries.</p> <p>Considers that Wellington needs innovative models for public and private investment working together to rapidly develop Wellington's large areas of underutilised land into high quality housing, greenspace and small business facilities.</p> <p>Current proposals assume a meagre 14% of rezoned areas will be developed.</p> <p>LIVE WELLington wants to see partnerships that can realise the potential of at least half our underutilised land in the next ten years.</p>	Seeks that the Proposed District Plan identifies development partnerships as a method for achieving an increased rate of development on land that is underutilised, and that the Plan also needs to identify the key potential actors.
Whole PDP / Whole PDP / Whole PDP	Paul Gregory Rutherford	424.8	Amend	<p>Considers that local government, central government agencies, private developers, and communities need to work in partnership not as adversaries.</p> <p>Considers that Wellington needs innovative models for public and private investment working together to rapidly develop Wellington's large areas of underutilised land into high quality housing, greenspace and small business facilities.</p> <p>Current proposals assume a meagre 14% of rezoned areas will be developed.</p> <p>LIVE WELLington wants to see partnerships that can realise the potential of at least half our underutilised land in the next ten years.</p>	Seeks that the Proposed District Plan needs to identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.
Whole PDP / Whole PDP / Whole PDP	Paul Gregory Rutherford	424.9	Amend	<p>Considers that Wellingtons liveability, character and heritage can be protected at the same time as new housing is added.</p> <p>[See original submission for full reasons]</p>	Seeks that the Proposed District Plan identify community-based planning for intensification as a method for increasing housing supply within areas subject to revised demolition controls.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Paul Gregory Rutherford	424.10	Amend	Considers that Wellington's liveability, and its character and heritage, can be protected at the same time as new housing is added. Not every old building needs to be retained, but neither are people's sense of connection and place disposable commodities. Rather than wholesale deregulation and the widespread removal of protections, heritage and character can be considered as part of community dialogue, while new construction focuses first on under-utilised land.	Seeks that the Proposed District Plan is amended to identify community-based planning for intensification as a method for increasing housing supply within areas subject to the revised demolition controls set out above.
Whole PDP / Whole PDP / Whole PDP	Fabric Property Limited	425.2	Support	Supports the aims of the Proposed District Plan. In particular submitter supports the following features and objectives of the plan: (a) the creation of well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (NPSUD)); (b) the provision of sufficient development capacity to meet long term demands for housing and business land; (c) the provision of a compact urban form and urban intensification; and (d) the hierarchy of centres, and the recognition of the City Centre as the primary centre serving the wider Wellington region.	Not specified.
Whole PDP / Whole PDP / Whole PDP	Paul M Blaschke	435.2	Amend	considers that Design Guides could have little effect on development in the City due to the fact much of the intensification building that will take place will not be subject to resource consents under the RMA. The use of the relevant PDP and other guidelines should be promoted as best practice and where possible incentivised through relevant policy provisions in the PDP. Such provisions may help enable the design objectives sought in the PDP and the guidelines, through market forces. It is finally noted that MfE guidelines on the Resource Management Enabling Act also refers to Design Guide guidelines, stating "See the non-statutory national medium density design guide which encourages high-quality and well-functioning design for residential developments that are permitted under the MDRS. This is for voluntary use alongside any design guidance territorial authorities use to assess development that requires resource consent."	Seeks that relevant sections of the PDP be amended to promote the use of the Subdivision and other Guidelines as best practice.
Whole PDP / Whole PDP / Whole PDP	Michelle Rush	436.1	Amend	Considers that there should be more local provision for recycling and reuse including collection and sorting facilities, in line with Council's signalling of moves to a circular economy. Currently, such activities fall within the definition of heavy industry, and aren't easily provided for at local level. Local recycling facilities should be enabled at neighbourhood or local centre scale as part of supporting a circular economy.	Seeks that the plan provisionally enable the collection and processing of recycled waste at smaller scale, in more places, as a controlled activity.
Whole PDP / Whole PDP / Whole PDP	Dale Mary McTavish	448.3	Oppose	Opposes the Proposed District Plan in its current form.	Seeks that Draft District Plan be reinstated. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	John Wilson	453.1	Amend	Considers that the extent of the zones should be clearly defined, e.g. by lines on a map. If defined by distance from the centre point, this should be defined in terms of distance from the centre point. Not in terms of time eg say five or ten minutes walk from the centre of the zone as this requires a subjective interpretation of how far and how fast a typical pedestrian could walk.	Seeks to clarify how zones are defined in terms of distance from the centre point compared to time in minutes walked. [Inferred decision requested]

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Marilyn Head	457.6	Oppose	Does not support housing intensification. [Refer to original submission for full reason]	Seeks that intensification is not enabled [inferred decision requested].
Whole PDP / Whole PDP / Whole PDP	Greater Brooklyn Residents Association Inc's	459.3	Not specified	Considers that there should be mandatory design requirements. [Refer to original submission for full reason]	Add mandatory design requirements. [inferred decision requested].
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.3	Oppose	Opposes upzoning entire suburbs and catchments, leaving developers to pick favoured individual sites.	Seeks that specific areas, where the community as a whole will benefit from development, should be upzoned rather than upzoning entire suburbs and catchments. [Inferred decision requested].
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.4	Amend	Considers that underutilised and smaller groups of underutilised sites close to public transport should be targeted for development. These are prime sites for apartments close to the city and require less infrastructure spend and coordination than many other sites.	Seeks that underutilised and smaller groups of underutilised sites close to public transport are targeted for development, including the strips along Adelaide Road, Kent Terrace, and Thorndon Quay.
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.5	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that land identified as priority for development through community planning processes should be prioritised for intensification, also supported by infrastructure and transport investments.
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.6	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that community-based planning as a method for intensification is adopted and describe a process for this in the District Plan.
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.7	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that a target of at least 50% of the development capacity being realised on underutilised land over the term of the Plan is added.
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.8	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that policies and methods are incorporated in the District Plan to support faster, high quality development for these sites (i.e. underutilised and smaller groups of underutilised sites close to public transport, and land identified as priority for development through community planning processes).
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.9	Amend	Considers that the NPS-UD is divorced from actual need because it requires councils to deliver a great deal of new development capacity all at once above the amount required at the time. This includes raising height limits irrespective of need. [See original submission for full reasons]	Seeks that the Council adopt a strategy of staging the release of new capacity for development, at least in the inner city suburbs, and prioritising areas for redevelopment.
Whole PDP / Whole PDP / Whole PDP	Anita Gude and Simon Terry	461.10	Amend	Considers that the NPS-UD is divorced from actual need because it requires councils to deliver a great deal of new development capacity all at once above the amount required at the time. This includes raising height limits irrespective of need. [See original submission for full reasons]	Seeks that Priority Development Areas for residential development are specified in the District Plan.
Whole PDP / Whole PDP / Whole PDP	Stride Investment Management Limited	470.1	Support in part	Generally supportive of the aims of the proposed plan. The following features and objectives are supported: - the creation of well functioning urban environments. - the provision of sufficient development capacity. - the provision of a compact urban form and urban intensification. - the provision of a range of commercial and mixed-use environments. - the hierarchy of centres. - recognition of Johnsonville as a Metroplitan Centre. - the provision for six storey residential development in the wider Johnsonville catchment.	Not specified.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Stride Investment Management Limited	470.2	Amend	<p>Opposes to the 'City Outcomes Contributions' provisions, and specifically is opposed to requiring 'City Outcomes Contributions' for 'over height' development.</p> <p>Considers it inappropriate for the provision of these publicly beneficial outcomes to be connected to non-compliance with height rules.</p> <p>[Refer to original submission for full reason]</p>	Remove all references to the 'City Outcomes Contributions' from the PDP and Design Guides.
Whole PDP / Whole PDP / Whole PDP	Foodstuffs North Island	476.1	Oppose	<p>Opposes NCZ-P10, LCZ-P10, MCZ-P10, and CCZ-P11 and related rules.</p> <p>While FSNI recognises the intent of these provisions in providing publicly beneficial outcomes, it is inappropriate for the provision of these publicly beneficial outcomes to be connected to non-compliance with height rules. Developments that breach height standards should instead be considered on their own merits and effects. The provision of beneficial outcomes in any development should be considered as part of the merits of a development, and should not be confined to a specified and required list.</p> <p>The 'City Outcomes Contributions' have the potential to act as a disincentive for development, which conflicts with the PDP strategic objectives and NPS-UD requirements of providing for development capacity and urban intensification.</p>	Remove all references in the PDP and Design Guides to City Outcomes Contributions.
Whole PDP / Whole PDP / Whole PDP	Foodstuffs North Island	476.66	Amend	<p>Generally supports the intent and provisions of the Design Guide, it is important that the design guides are reference documents that sit outside the PDP, rather than being formally incorporated into it. Incorporating the design guides into the PDP elevates these provisions into the form of standards, rather than what they are intended to be as guidance.</p> <p>It is not appropriate to provide that the Council's discretion is restricted to all matters in the Design Guide. This does not give any clear direction or certainty for applicants and is onerous for the preparation and assessment of resource consent applications.</p>	Seeks the relevant provisions (which refer to design guides as notified) instead refer to the specific design outcomes that are being sought.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.6	Not specified	Submitter wishes to second James Coyel's DP submission.	<p>Supports James Coyle's submission.</p> <p>[Refer to submission 307]</p>
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.7	Not specified	Seeks to see more inclusion of the lessons learnt form urban planning around the globe.	Seeks to see more inclusion of the lessons learnt form urban planning around the globe within the plan.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.8	Not specified	<p>Considers that is there is very little detail in the DP to prevent poor quality outcomes that meet minimum criteria in planning and consenting phase.</p> <p>Considers that Wellington is at a crucial juncture between needing to rapidly modernise and build more densely, but being in danger of developing over all that makes Wellington a vibrant city, a cultural centre, and a great place to live. What we do has to be of higher quality. To minimise emissions over the longterm we also need to significantly improve the quality of urban planning and building performance.</p>	Seeks that there is greater detail in the DP to prevent poor quality outcomes that meet minimum criteria in planning and consenting phase. [Inferred decision requested]

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.9	Not specified	<p>Submitter considers that Wellington needs to become denser, and this can happen with carefully considered urban form that relates to the existing surrounding structures, culture and community.</p> <p>Submitter considers that the District Plan does not do this and needs to better encourage the quality of urban form to be highest possible. For example, if we do not consider embodied energy of urban form and building stock, we will not achieve our cities low emissions goals.</p> <p>To meet Climate goals and resource conservation goals, all new urban form needs to be build to last 100 year plus. If we're planning to build for 15 or 20 years, this will not meet the needs of future generations, it will burden them with much higher re-development cost and unnecessarily force more emissions into the atmosphere.</p>	<p>Seeks that the Proposed District Plan should better encourage the quality of urban form with density.</p> <p>[Inferred decision requested]</p>
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.10	Oppose	<p>Considers that Newtown is unfairly targeted for the highest of intensification. All of Wellington should be subject share the same intensity goals.</p>	<p>Opposes the level of intensification in Newtown.</p> <p>[Inferred decision requested]</p>
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.11	Amend	[Refer to original submission for full reason]	Seeks that the District Plan will ensure building heights are tiered and not haphazard.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.12	Amend	[Refer to original submission for full reason]	Seeks that the District Plan will support low embodied emission and high performance building experimentation by reducing red tape and cost.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.13	Amend	<p>Seeks that the highest intensity needs to happen in concentrated pockets, not allowed to be placed haphazardly across anywhere in Newtown.</p> <p>[Refer to original submission for full reason]</p>	<p>Seeks that highest intensity developments needs to happen in concentrated pockets.</p> <p>[Inferred decision requested]</p>
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.14	Amend	[Refer to original submission for full reason]	<p>Seeks that the District Plan will include:</p> <ul style="list-style-type: none"> a) protections for existing property owners to prevent overshadowing from new multi-story buildings, or b) current market rate compensation options for existing property owners that are overshadowing from new multi-story buildings.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.15	Amend	[Refer to original submission for full reason]	Seeks that the District Plan will encourage the protection of Newtown's pockets of heritage character, and will pay particular attention to building height and structure in these areas.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.16	Amend	[Refer to original submission for full reason]	Seeks that the District Plan promotes safe cycle pathways fully separate from traffic.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.17	Amend	[Refer to original submission for full reason]	Seeks that the District Plan promotes better use of land and urban space by allowing boundary sharing (of walls or partitions on the boundary) if both parties are in agreement.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.18	Amend	[Refer to original submission for full reason]	Seeks that the District Plan needs to support the removal of private cars and on street car parking, and to make way for active travel, safe cycle paths away form traffic and public transport.
Whole PDP / Whole PDP / Whole PDP	Ben Barrett	479.19	Amend	[Refer to original submission for full reason]	<p>Seeks that the District Plan needs to:</p> <ul style="list-style-type: none"> a) support safe attractive walking corridors; b) with food growing that is cared for by Council staff.
Whole PDP / Whole PDP / Whole PDP	Catharine Underwood	481.3	Not specified	<p>Considers that the PDP does not provide consistent natural and physical features and characteristics that contribute to a unique 'sense of place. Allowing large 22m buildings next to pepper potted heritage and character will create small, disconnected blocks easily compromised or destroyed by high density development adjacent.</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	Living Streets Aotearoa	482.1	Amend	<p>Considers that there should also be provision for requiring that significant developments that do not in themselves contribute to pedestrian amenity make a financial contribution towards that</p>	<p>Add a new provision requiring that significant developments that do not in themselves contribute to pedestrian amenity make a financial contribution towards that.</p>

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Living Streets Aotearoa	482.20	Not specified	Considers that too many buildings have blank walls, high and solid fences or frontages dominated by spaces such as carparks. This makes these spaces less safe for walkers.	Seeks that buildings are designed so as not to have blank walls and high and solid fences or frontages dominated by spaces such as carparks.[inferred decision requested].
Whole PDP / Whole PDP / Whole PDP	Living Streets Aotearoa	482.21	Amend	Supports the inclusion of a section on "assisted housing" and the inclusion in that of a financial contribution provision. Considers it is important that the city continues to have a mix of residents in all areas.	Amend the plan to include an "Assisted Housing" chapter.
Whole PDP / Whole PDP / Whole PDP	House Movers Section of the New Zealand Heavy Haulage Association Inc	485.1	Amend	Considers that the regulatory controls in the District Plan need to properly reflect the purpose and intentions of the RMA 1991 as expressed in the decision of the Environment Court in New Zealand Heavy Haulage Association Inc v The Central Otago District Council (Environment Court, C45/2004, Thompson EJ presiding). In that decision the Environment Court held that there was no real difference in effect and amenity value terms between the in situ construction of a new dwelling and relocation of a second-hand dwelling, subject to appropriate permitted activity performance standards.	Seeks that the regulatory controls in the District Plan properly reflect the purpose and intentions of the RMA 1991 as expressed in the decision of the Environment Court in New Zealand Heavy Haulage Association Inc v The Central Otago District Council (Environment Court, C45/2004, Thompson EJ presiding).
Whole PDP / Whole PDP / Whole PDP	House Movers Section of the New Zealand Heavy Haulage Association Inc	485.2	Support	Supports (in general) the change to enable the relocation of buildings as a permitted activity status for those applications involving relocated buildings that meet performance standards and criteria, as set out in the submission's attachment Schedule 1. [Refer to original submission for Schedule 1 attachment].	Retain approach of the plan that relocated buildings are not treated differently to those constructed on site.
Whole PDP / Whole PDP / Whole PDP	House Movers Section of the New Zealand Heavy Haulage Association Inc	485.3	Support	Supports the WCC retaining a degree of control over relocated buildings through the use of performance/permitted activity standards.	Retain approach of the plan that relocated buildings are not treated differently to those constructed on site.
Whole PDP / Whole PDP / Whole PDP	House Movers Section of the New Zealand Heavy Haulage Association Inc	485.4	Support	Supports Restricted Discretionary activity status for relocated buildings that do not meet the Permitted Activity status standards.	Retain approach of the plan that relocated buildings are not treated differently to those constructed on site.
Whole PDP / Whole PDP / Whole PDP	Te Rūnanga o Toa Rangatira	488.4	Amend	Considers that there is no obvious linkage throughout the plan to Te Mana o Te Wai and is concerned that there are no other references in other chapters.	Seeks that the plan is amended to include more references to Te Mana o Te Wai.
Whole PDP / Whole PDP / Whole PDP	Te Rūnanga o Toa Rangatira	488.5	Amend	Considers that the Papakāinga Design Guide needs to refer to an associated chapter.	Seeks that a Papakāinga chapter be included in the plan.
Whole PDP / Whole PDP / Whole PDP	Te Rūnanga o Toa Rangatira	488.6	Amend	Concerned that the plan does not provide for Papakāinga	Seeks that the plan provides for Papakāinga on Māori owned land or ancestral land. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	Te Rūnanga o Toa Rangatira	488.7	Amend	Concerned that the plan does not provide for Papakāinga	Seeks that the plan provides for Papakāinga in zone chapters. [Inferred decision requested]
Whole PDP / Whole PDP / Whole PDP	Jonathan Markwick	490.1	Support	Supports the preference for a compact city where growth is concentrated within the existing urban area of Wellington, in particular the city centre, town centres, inner suburbs and along public transport corridors.	Not specified.

General Point on Whole Proposed District Plan

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Whole PDP / Whole PDP / Whole PDP	Jonathan Markwick	490.2	Oppose	<p>Opposes any rules that make the vision of a compact city where growth is concentrated within the existing urban area of Wellington, in particular the city centre, town centres, inner suburbs and along public transport corridors difficult to achieve.</p> <p>Considers it distressing that council is restricting or effectively banning new housing where demand for new housing is highest during a housing crisis.</p>	Not specified.
Whole PDP / Whole PDP / Whole PDP	John McSoriley and Pierre David	493.1	Not specified	<p>Considers that there are areas of Wellington that are much more suitable for intense urban development (than Lower Kelburn).</p>	<p>Seeks that urban development is focussed in areas including Te Aro especially around the state highway 1 (known as the bypass): the flat area to the west of Cambridge Terrace: the area between the Basin Reserve and the Wellington Regional Hospital, and perhaps also central parts of the suburb of Kilbirnie, around or over the Wellington railway station marshalling yards and the adjacent area of Thorndon Quay and the Wellington port (especially if the port is moved further north) and also the flat parts of the area very near the city known as Kaiwharawhara.</p> <p>[Inferred decision requested].</p>
Whole PDP / Whole PDP / Whole PDP	Te Whatu Ora - Health New Zealand	496.1	Support	<p>The Proposed District Plan is supported in its entirety. The PDP does a good job of establishing the enabling approach needed to allow for the Hospital to respond to changing health needs. the proposed objectives, policies, and rules, are supported, including where thresholds are set for planning involvement.</p>	Retain the Proposed District Plan as notified.