



Global Research
Turning Information Into Insight

Draft Wellington District Plan Public Consultation

SUMMARY REPORT

February 2022

Prepared by Global Research Ltd

For

**Absolutely Positively
Wellington City Council**

wellington.govt.nz

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Introduction

The Draft Wellington District Plan (The Plan) is Wellington City's first fully revised planning rulebook in more than 20 years.

The Plan deals with the major planning and environmental issues facing the city – including housing supply choice and affordability, protecting biodiversity, integrating growth and infrastructure, responding to climate change and managing the risk of natural hazards.

Consultation on the Draft District Plan opened on 2 November, 2021 and closed on 14 December, 2021.

Submissions received

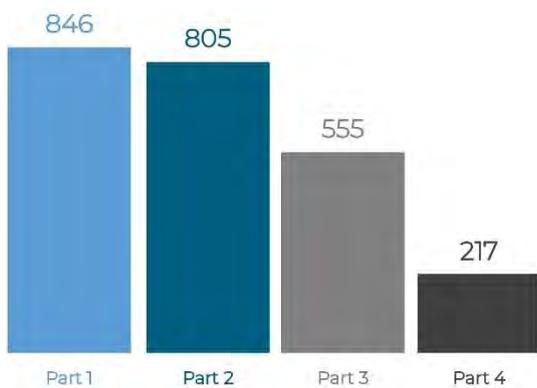
1,034

TOTAL SUBMITTERS

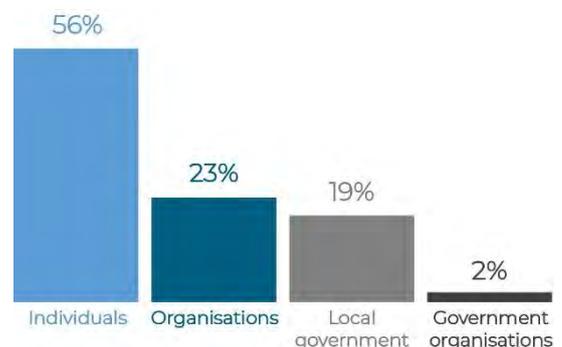
2400+

SUBMISSIONS

Number of comments made on each Plan part



Number of submissions made from submitter types



Reading this summary

This document is a summary of the over 2400 submissions received on the Draft Wellington District Plan. It begins with an overall snapshot of the submissions received on the four parts of The Plan. The second half of the discussion presents a summary of the submissions received on each section of The Plan, ordered by the four parts.

The nature of the submissions received on Part 1 of The Plan lent themselves to thematic analysis and synthesis of points made across multiple sections. The submissions on Parts 2, 3 and 4 of The Plan were predominantly focused on particular sections, and the summaries match the order of The Plan.



Draft Wellington District Plan engagement snapshot

Overview of submissions on each Part

Part 1

Part 1 received 846 submissions

- > **Submissions covered** a wide range of broad city outcomes and amenity outcomes rather than focusing on particular sections or subsections of The Plan (as was the case for Parts 2, 3 and 4).
- > **Changes to zone rules** received the most comments. A frequently submitted pro-forma submission via A City for People supported intensification measures to increase affordable housing, but also stressed this should not occur at the expense of liveability and amenity.
- > **Residential Zone** submissions in support of intensification specifically supported removing front and side setbacks and maximum site coverage rules, minimum permeable surface requirements, and measures to make housing more affordable and accessible for a diverse range of people. Submissions that opposed significant intensification in residential zones focused primarily on building heights and argued that the liveability of existing homes would be overly affected by development of multi-storey buildings and subsequent loss of sunlight, privacy, and character.
- > **Central City Zone** submissions showed more support for increasing building heights than in Residential Zones, deeming this an effective way to increase the housing supply in Wellington without unduly impacting the city's suburbs.
- > **Transportation** comments were dominated by support for low-carbon transport options and for infrastructure to enable these modes (cycling, walking, micro-mobility modes, and public transport). Public transport was thought to be most effective when access points were close to high density residential areas. Although there was still support for private vehicles and infrastructure such as car parking, this was a minority view.
- > **Housing needs** were the most commonly commented on strategic issue – increased stock and more affordable housing is considered a key challenge for the city. Relatedly, the motives of developers were questioned, with a large number of submitters urging that WCC not rely on profit-driven businesses to deliver positive community outcomes.
- > **Infrastructure** submissions commonly expressed concern about the ongoing capacity of Three Waters and other infrastructure. Finding reliable and appropriate environmental solutions, such as permeable surface rules to enable local stormwater management, were supported.
- > **Natural environment** support were dominated by climate change response needs. The desire for open space expansion and protection was another important issue
- > **Hazards and risks** exacerbated by climate change climate were a concern. Earthquake risk and resilience was referenced by a substantial number of submitters, particularly risks around 6+ storey apartment buildings. Submissions regarding flooding wanted specific changes to current management.
- > **The National Policy Statement on Urban Development** (NPS-UD) was supported by a large number of A City for People Submissions to enable more housing in the city. Others sought an exclusion for some suburbs from increased height limits.
- > **Tangata whenua** rights regarding decision-making that impacts the land and its uses was discussed by submitters. They highlighted the importance of acknowledging traditional ownership and guardianship, and expressed expectations that WCC adequately include tangata whenua in decision-making and foster effective and respectful relationships.

Part 2

Part 2 received 805 submissions

- > **Energy, infrastructure, and transport** received the greatest number of submissions to this part of The Plan, most in support of Plan provisions. Many were from infrastructure stakeholders and included detailed suggestions, comments, and amendments. The coastal environment subsection section received the most comments, with overall general support for provisions.
- > **Three Waters** Infrastructure provisions were largely supported, but there were calls for text changes in a large proportion of submissions. Concern was expressed about the ability of systems to cope with increased housing density.
- > Submissions to the **Natural Environment Values** sections were permeated with comments opposing the blanket designation of private land as an SNA (Significant Natural Area). Although there was support for biodiversity protection provisions in general, and specific support noted for Natural Features and Landscapes provisions, the SNA overlays were thought to be problematic in multiple ways.
- > The **Strategic Direction** section of The Plan received many amendment suggestions, mainly in the form of text changes. Common themes throughout reflected concern for protection of the natural environment, secondarily, that this protection occur to enhance climate change resilience, and lastly, that certain specific changes be made to better support city assets and infrastructure.

Part 3

Part 3 received 555 submissions

- > **Residential Zones** were overwhelmingly the most discussed, with Medium Density Residential Zones (MRZ) alone forming the greater part of the submissions in the entirety of Part 3. Raising maximum building heights in residential areas was largely opposed, with submitters citing significant potential impacts (loss of light, privacy, and amenity). Submissions objecting to densification in Mt Victoria and Oriental Bay were well represented in submissions about MRZ.
- > **General Residential Zone** submissions, while supportive of Policies and Land-use Activities, offered mixed opinions about Effects Standards. There were arguments both for and against permeable surface areas and boundary setbacks, with some seeking maximised building footprints, and others wanting to ensure the retention of green/garden space.
- > **Commercial and Mixed Use** zones were mainly focused on the City Centre Zone. Submitters argued proposed building heights would create shading and crowding, and adversely impact on character amenity. Clarification and specific property exemptions were also sought.
- > **Development Area** submissions predominantly made specific points.

Part 4

Part 4 received 217 submissions

- > **Design Guide** submissions focused on outcomes such as extending character areas, protecting and promoting aesthetically pleasing streetscapes (including heritage), limiting building heights in character areas, and limiting the damaging aspects of development.
- > **Schedules** comments were dominated by objections to **Significant Natural Area** designations on privately owned property. While several supported the intent of SNAs, the efficacy and fairness of the schedule was widely challenged. **Heritage** was also of great concern, with most who submitted on this topic calling for retention of heritage and character areas.



Part 1: Introduction and general provisions

How the plan works

250 comments

A very large number of submitters commented on the 'How the Plan Works' section. The National Policy Statement on Urban Development (NPS-UD) was cited in 250 submissions. Around 200 of these submissions received via the City of People submission form supported The Plan's compliance with the NPS-UD, however, a considerable number objected to the NPS-UD itself or of the way it had been interpreted and applied to the city.

Tangata whenua

50 comments

A substantial number of submitters made points relating to tangata whenua and the rights and needs of this group regarding decision-making that impacts the land and its uses. Common themes within comments were acknowledgement of traditional ownership and guardianship, and expectations that WCC adequately include tangata whenua in decision-making.

In this vein, the Treaty of Waitangi was referenced, alongside calls for WCC to be proactive in fostering effective and respectful relationships with tangata whenua

Strategic issues

1,300 comments

A large number of submitters lauded the housing objectives of The Plan but reiterated that more – and more affordable – housing is needed. Relatedly, the motives of developers were called into question here, with a large number of submitters urging that WCC neither rely on nor trust in their ability to provide affordable and robust housing. Submitters contended that developers are profit-driven rather than community-outcomes driven.

The strategic direction of The Plan was called upon to be reoriented so that the needs of various groups are better considered and to better face a changing climate. This was largely residents of or communities within Wellington, but also cohorts within society such as LGBTI+ and youth.

A substantial number of submitters wanted to see community-focused outcomes, that is, provision of community places and spaces in an intensified city. A similar number of submitters to this section of The Plan supported the idea of a circular economy and a similar number again wanted to see planning account for the importance of visual amenity to city living.

Lastly, the issue of assisted housing (or inclusionary zoning) was supported, mainly based on the understanding that this would result in greater stocks of affordable housing. There was, however, scepticism around whether or not this would be the outcome

Roading and transport

1,050 comments

A very large number of submissions received discussed roading and transport-related topics and almost half of those commented on public transport. A good fifth of all submissions supported that proposed intensification should be located near public transport. Three other topics which each gathered a sizeable number of submissions were cycling, car parking, and private vehicles. The Plan's approach to cycling and private vehicles was mostly supported by submitters, however, losing car parking spaces was a more contentious topic. Pedestrianisation in Wellington was mostly well received by a substantial number of submitters.

Infrastructure improvements

465 comments

A very large number of submissions commented on infrastructure improvements. Most comments expressed concern about capacity of water infrastructure or other infrastructure systems not meeting sustainability goals. Two hundred and thirty submissions were received for stormwater, mostly supporting proposed permeable surface requirements, while others expressed concern about stormwater network reliability and frequent pipe ruptures. The next largest number of comments received discussed hard waste management and supported circular economy principles.

Hazards and risks

365 comments

A very large number of submissions were received discussing Hazards and Risks, with most comments relating to natural hazards. Almost half of those submissions emphasised the need for climate action.

The second largest topic was earthquake risk and resilience, which was referenced by a substantial number of submitters. Over half of those were concerned about earthquake risks around 6+ apartment buildings. Specific text changes or amendments for various natural hazards provisions were proposed by a considerable number of submitters. Flooding issues gathered a considerable number of submissions and over half opposed their current management or proposed provisions. Fire was the least commented on natural hazard topic, and a small number of submissions discussed individual topics.

Historic and cultural values

10 comments

Submitters expressed concerns that heritage and cultural values are not sufficiently protected in The Plan. The contribution to visual amenity and the intrinsic value of character and heritage were reiterated in the small number of comments to this section.

(*Note that although there were many submissions which included comments about historical and cultural values, the vast majority of these were submitted to other sections of The Plan, i.e., those which pertained

to intensification and its potential impact on character areas or character homes. Consequently, there are few submissions discussed in this section.)

Natural environment values

500 comments

The bulk of the comments on this topic were about climate change with submitters overwhelmingly calling for climate issues to be prioritised in decision-making. The urgency of submitters was expressed with use of such phrases as “climate emergency” and “climate crisis”. Many outlined specifics in their comments as to how this issue could be addressed; this included support for the 20-minute walkable city and low-emissions transport modes.

Environmental protection measures such as the following were supported: retaining existing green/open spaces (for their environmental value), retaining trees and vegetation, and “greening” the city.

In addition to environmental protections, a large number of submitters called for retention of green or open spaces for the use and wellbeing of city residents. Around half of the 100 comments on open and green spaces for public use called for more green and open spaces, particularly given increasing populations and intensification. Remaining comments called to attention the importance of open and green spaces to wellbeing. This was sometimes in relation to open and green space, and sometimes in relation to these places offering recreation opportunities of both an organised and informal nature.

Zones

1,650 comments

Zones comments were comprised of just over half pertaining to residential, and just under half to rural, commercial, city centre, medium density, and mixed industrial.

Residential zoning matters garnered a very large number of comments, the vast bulk of which were in support of various objectives and provisions regards to specifics such as setbacks, minimum permeable surfaces, and the projected outcomes of more affordable housing resulting from this planning process.

A substantial number of submitters supported intensification measures but warned that this must not come at the cost of liveability and wellbeing for urban residents, while a moderate number wanted to see maximum heights limits increase (in certain areas) to accommodate growth.

Suggestions for better ways to intensify the city were received in very large numbers, often from residents who were concerned about how intensification would impact their suburb. Additionally, these submissions frequently contained suggestions of places deemed more suitable for intensification.

The perceived negative impacts of intensification permeated many submissions, and were mainly about building heights and the potential for higher buildings to block sunlight and irredeemably alter the city's character. These issues were of great concern to many submitters, whose language was oftentimes strong on this topic. In spite of these issues, there was generally a consensus that intensification must occur.

Comments about other zones (i.e., rural, commercial, medium density, and mixed industrial) numbered only slightly fewer than residential – around 750. Of these, around a third were concerns that medium

density development would have a negative impact on amenity and liveability of city residents. Calls were made to retain MRZ for some areas proposed to be up-zoned to CCZ. Relatedly, a similar number of CCZ comments were mainly in support of increasing building heights in a tightly defined city centre- this was often suggested as a means of protecting surrounding residential suburbs from intensification.

The timing and sequencing of the rollout of intensification was addressed in a sizeable number of submissions, a large proportion of which were pro-forma submissions from Live Wellington calling for phased intensification starting with brownfield sites in the city. Similarly, an additional considerable number of submitters specifically called for this to occur, wanting to see the repurposing of industrial city land for housing before existing suburbs were intensified.

Topography was a topic of concern for a sizeable number of submitters, most of which focused on the need for planning decisions to account for the steep and, at times unstable, nature of the hilly landscapes upon which planning rules were overlaid.

Design guides

300 comments

Two-thirds of the 300+ submissions to the Design Guides section were from the pro-forma A City for People submission in which sustainable, well-lit, high-amenity, and well-designed development was supported. Additional submitters expressed support for attention to aesthetics and amenity in planning and the design guides that underpin this.

Interpretation

70 comments

A substantial number of submissions commented on the Interpretation subsection in The Plan and submissions frequently made technical references. Out of all submissions to this subsection, about half supported The Plan's proposed definitions. Most of the remaining comments made individual comments about specified definitions and most argued this with supporting information. A small number of submissions also highlighted the need to align definition of terms with other relevant documents.

About the process

45 comments

Submitters sought simple, reliable access to the Plan to make their submissions. Some criticised the complexity of the engagement software and others felt The Plan's parts were too detailed in order for them to make a submission in reasonable time. Some wished for the submission period to be longer. There was a desire for Council to consider and respond to submission appropriately. The functionality of the engagement software was criticised by some.



Part 2:

District-wide matters

Strategic direction

126 comments

A large number of comments were received on the Strategic Direction section. A good proportion of submitters had diligently read subsections and provisions and proposed specific text changes or amendments, and a small number requested more clarity in wording.

The importance of and appreciation for the natural environment was emphasised, in particular the protection of indigenous flora, whether this was through recognition of tangata whenua, strategic city planning or on a direct and private level.

A second key theme which appeared in two subsections expressed concern about the potential loss of character in Wellington streets or neighbourhoods resulting from the proposed changes to character overlays.

Energy, infrastructure, and transport

284 comments

A very large number of submissions were received for the Energy, Infrastructure and Transport section. Submissions reflected support for most of the subsections, however, submitters frequently proposed specific text changes or amendments. Public utility companies provided comprehensive submissions offering concise but detailed suggestions to The Plan's provisions. Points repeatedly discussed included the need for a separated policy framework for the National Grid, ensuring provisions give effect to other relevant Policy Statements and regulations, for example regarding emergency vehicle access, and finally, support was expressed for prioritising micromobility use and on-site parking over on-site car parking.

Hazards and risks

33 comments

A considerable number of submitters commented on the Hazards and Risks section which was received with general support as well as frequent proposals for specific text changes to provisions. Most submitters were stakeholders or interested parties to assets affected by hazards and risks and this was reflected in concise and specific commentary and responses to the proposed provisions.

Historical and cultural values

25 comments

The Historical and Cultural Values section was supported by the majority of submitters. An emerging trend revealed strong support for the protection of heritage buildings and sites in Wellington city. The pre-1930s demolition rule especially received frequent support and those submitters proposed it should be reinstated. Although the Sites and Areas of Significance to Māori subsection received the most comments and supporting comments in this section, most did not specifically relate sites or areas of significance to Māori. The Notable Trees and Viewshafts subsections both gained general support from the small number of submitters who commented on them.

Natural environment values

201 comments

A very large number of comments were received for the Natural Environment Values section. Within these, there was a strong thread of opposition for The Plan's proposed Significant Natural Areas (SNAs). Many of these opposing comments noted their support for the intent of SNAs but cited loss of usable garden or outdoor space, cost for resource consent and ecologist report and felt their private property rights were being encroached on. Among the short submissions a range of specific text changes were proposed throughout the section and two amendments suggested.

Subdivision

15 comments

A moderate number of submitters commented on the Subdivision section with over half of comments opposing specific provisions for a wide range of reasons. A few of those comments proposed specific text changes. Frequently, submissions focused on the value of subdividable land and the restrictions, such as Significant Natural Areas (SNAs), imposed on its potential.

General district-wide matters

85 comments

A sizeable number of submissions commented on the General District-Wide Matters section. The three most discussed themes were, from most frequent to least frequent: Noise, Coastal Environment, and Earthworks. Generally, these comments expressed concern about either The Plan's permissive approach to noise control or earthworks enabling development. About a quarter of submissions proposed specific text changes, amendments, discussed provisions, or sought clarification. Overall, submissions reflected a desire for a healthy, enjoyable and safe city and were critical of Plan provisions or approaches which threatened those ideals.

Planning maps

35 comments

A considerable number of submissions commented on the Planning Maps. Overall, there was a notable amount of opposition to the various zones and overlays proposed. The proposed intensification and building height increases garnered the most opposition as this was felt to create a loss of character, ambience, and general liveability for existing residents. The same proposal, however, was supported by a small number of submitters. A second prevalent topic was Significant Natural Areas (SNAs) which were rejected by all in their application to private land.



Part 3: Area-specific matters



Zones

526 comments

Most submissions received for the Zones section related to proposed increase of building height limits and over half of those were made for residential zones.

Submitters opposed the new height limits and cited loss of sunlight, shading, wind tunnelling, loss of character and amenity and accompanying pressure on infrastructure from new residential developments.

A fifth of submitters commented on Commercial and Mixed Use Zones and stated adverse impacts from the proposed developments on existing households or communities as reasons for objecting to The Plan's provisions.

Specific text changes or amendments were proposed in numerous subsections. The remaining submissions included a variety of topics and points relating to those subsections.

Development areas

34 comments

Submissions queried whether specific aspects of provisions would achieve desired results, and while there was some broad support for many subsections, there were questions about transport accessibility of greenfields development, as well as around the impacts that such developments have on climate change and carbon neutrality goals.

An array of points specific to certain provisions were made.

Designations

4 comments

Four submissions were made in this section on behalf of Chorus NZ Limited, Spark New Zealand Trading Limited, Transpower New Zealand Limited, and Greater Wellington Regional Council.



Part 4: **Appendices, design guides and schedules**



Appendices

28 comments

Each subtopic within this section received 5 or fewer comments, many of which pertained to different topics. There was a mixture of agreement with provisions, some opposition, and many text changes, amendments, or statements expressing points of concern.

Design guides

45 comments

Submissions were concerned with extending character areas, protecting and promoting aesthetically pleasing streetscapes (including heritage), limiting building heights in character areas, and limiting the damaging aspects of development (including attention to water and wetlands, and reducing sediment and runoff from development).

There was blanket opposition to increases in maximum heights in Oriental Bay, with Hay Street consistently described as unsuited to building heights of 21m.

Schedules

135 comments

Commentary on schedules was dominated by objection to SNA designations on privately owned property. There were a substantial number of submissions in opposition to SNAs on private land, and, while several supported the intent of SNAs, the efficacy and fairness of the schedule was widely challenged.

Heritage was also of great concern, with most who submitted on this topic calling for retention of heritage and character areas. Intensification measures that impinge on character and/or amenity were not well supported. Heritage protections were only challenged where they were viewed as limiting the ability of the property owner to make changes to their properties. Many called for heritage precincts to be extended, or for certain properties to be included.

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