

Section 32 Evaluation Report

Part 1: Context to s32 evaluation and evaluation of proposed Strategic Objectives

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Table of Acronyms

Abbreviation	Full term
AIRZ	Special Purpose Airport Zone
CCZ	City Centre Zone
COMMZ	Commercial Zone
CORZ	Special Purpose Corrections Zone
FUZ	Special Purpose Future Urban Zone
GIZ	General Industrial Zone
GRUZ	General Rural Zone
GWRG	Greater Wellington Regional Council
HOSZ	Special Purpose Hospital Zone
HRZ	High Density Residential Zone
ISPP	Intensification Streamlined Planning Process
LCZ	Local Centre Zone
LGWM	Let's Get Wellington Moving
LLRZ	Large Lot Residential Zone
LTP	Long Term Plan
MCZ	Metropolitan Centre Zone
MDRS	Medium Density Residential Standard
MfE	Ministry for the Environment
MOU	Memorandum Of Understanding
MRZ	Medium Density Residential Zone
MUZ	Mixed Use Zone
NCZ	Neighbourhood Centre Zone
NES	National Environmental Standards
NESCS	National Environmental Standard for Assessing and Managing Contaminants In Soil To Protect Human Health
NESET	National Environmental Standard for Electricity Transmission Activities
NESPF	National Environmental Standard for Plantation Forestry
NESTF	National Environmental Standard for Telecommunication Facilities
NOSZ	Natural Open Space Zone
NPS	National Policy Statements
NPSET	National Policy Statement for Electricity Transmission
NPSFM	National Policy Statement for Freshwater Management
NPSREG	National Policy Statement for Renewable Electricity Generation
NPS-UD	National Policy Statement on Urban Development
NZCPS	New Zealand Coastal Policy Statement
ODP	Operative District Plan
ONFL	Outstanding Natural Features and Landscapes
OSZ	Open Space Zone
PDP	Proposed District Plan
PORTZ	Special Purpose Port Zone
QUARZ	Special Purpose Quarry Zone
RMA	Resource Management Act

RPS	Regional Policy Statement for The Wellington Region 2013
SAL	Special Amenity Landscapes
SARZ	Sport And Active Recreation Zone
SNA's	Significant Natural Areas
STADZ	Special Purpose Stadium Zone
TERT	Special Purpose Tertiary Education Zone
WCC	Wellington City Council
WFZ	Special Purpose Waterfront Zone
WTBZ	Wellington Town Belt Zone

1.0 Introduction

This evaluation report provides an overarching introduction to the purpose of a s32 evaluation and the legislative requirements that underpin it. It also sets out the wider statutory and policy context and approach that has informed the development of the Proposed Wellington City District Plan (PDP). It also provides an overview of the nature and extent of related consultation and engagement undertaken. An evaluation of the proposed Strategic Objectives is also included.

Part 2 of the evaluation report contains a separate and more detailed evaluation of each of the topics that form part of the review of the Operative Wellington District Plan. Each of these evaluations has been undertaken using a standard methodology, the purpose of which is to ensure that a consistent approach and level of rigour has been applied to each of the topic areas.

2.0 Plan preparation process

For the purposes of preparing and notifying the PDP the Council has chosen to use the following two processes:

- An Intensification Streamlined Planning Process (ISPP) under Part 6 of Schedule on of the RMA. This process is required to be used in preparing and notifying the intensification planning instrument required for the purposes of incorporating the medium density residential standards (MDRS) in Schedule 3A of the Act and the provisions that give effect to the directions in Policies 3 and 4 of the National Policy Statement on Urban Development 2020 (NPS-UD).
- An RMA Schedule 1 process for all remaining plan content.

The reasons for selecting these approaches include:

- As a Tier 1 local authority, the Council is statutorily required to use the ISPP process to include the medium density residential standards (MDRS) and provisions that give effect to Policies 3 and 4 of the NPS-UD.
- The Schedule 1 process was chosen for all other aspects of the PDP because the Council considered that these matters should be subject to a process where submitters retain the right to appeal decisions to the Environment Court.

3.0 Section 32 requirements

The overarching purpose of s32 of the RMA is to ensure that any Proposed District Plan provisions are robust, evidence-based and the best means to achieve the purpose of the Act. The Council is required to undertake an evaluation of any proposed provisions prior to their notification. The s32 evaluation report provides the rationale for the proposed provisions and, as such, needs to be read in conjunction with those provisions.

Section 32(1) of the RMA requires that, before the Council publicly notifies a proposed policy statement or plan, it must examine:

- (a) *“the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*

- (b) *“whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
- i. identifying other reasonably practicable options for achieving the objectives; and*
 - ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - iii. summarising the reasons for deciding on the provisions”.*

The evaluation report must also contain a level of detail that:

- (c) *“corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.”*

In assessing the efficiency and effectiveness of the provisions in achieving the objectives of a proposed plan the report must, under s32(2):

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

Additionally, under s32(4A), the report must also:

- (a) *“summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and*
- (b) *summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.”*

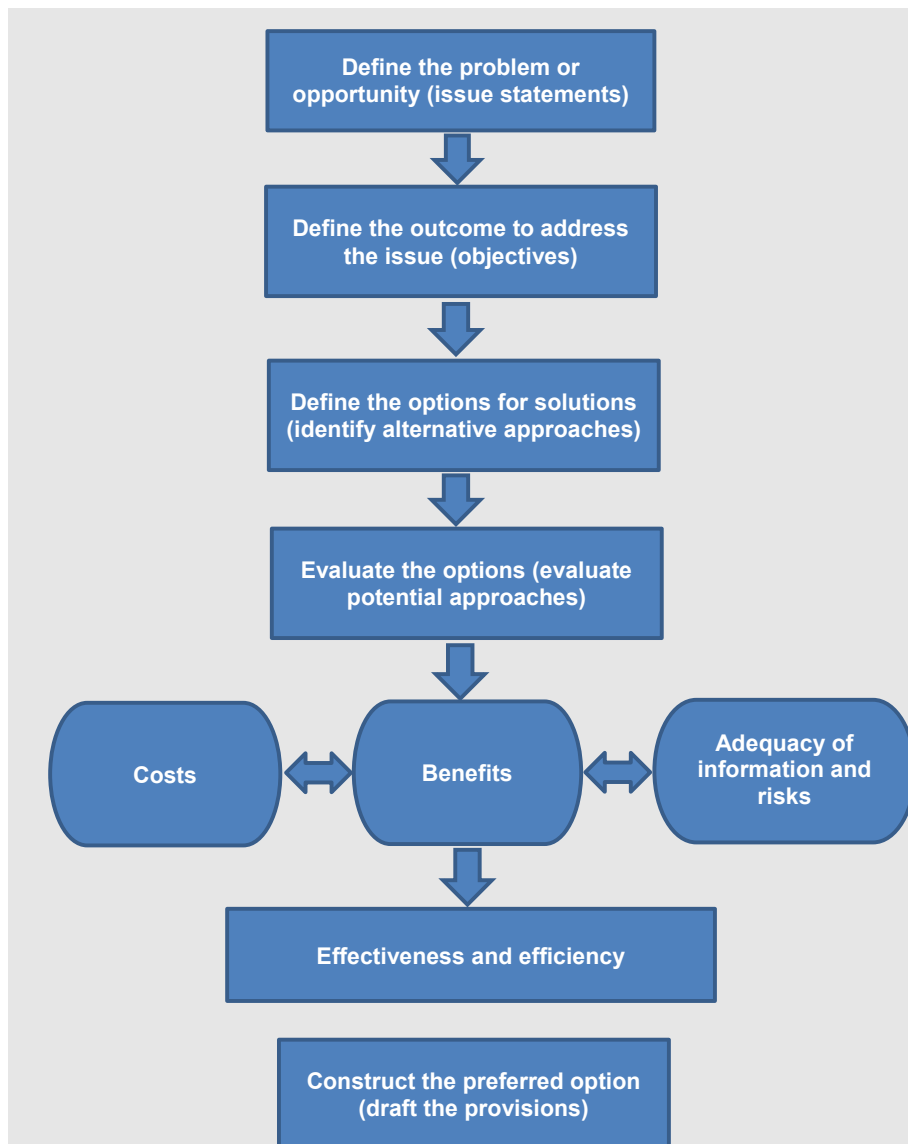
4.0 Approach to s32 evaluation

The Council has developed a standard methodology and approach to its s32 evaluation in order to ensure a consistent evaluation process. This approach has been developed taking into account guidance from the Ministry for the Environment, the Quality Planning website, case law and best practice approaches throughout the country.

The following flow chart outlines the step-by-step methodology that the Council has followed in undertaking its evaluation. The methodology broadly comprises the following elements:

- An analysis of the relevant regulatory and policy context, including national planning instruments, regional policies and plans and non-statutory strategies and plans
- Identification and analysis of the relevant issues relating to the topic, including the associated research commissioned, consultation undertaken, and information compiled, along with advice received from Taranaki Whānui and Ngāti Toa Rangatira

- An assessment of the scale and significance of the anticipated environmental, economic, social and cultural effects of the proposed provisions
- An evaluation of the proposed objectives to determine their appropriateness in achieving the purpose of the RMA
- An evaluation of the proposed policies and rules and reasonably practical alternatives to achieve the proposed objectives, including the costs, benefits, effectiveness and efficiency of the approach and the risk of acting or not acting



5.0 Wider statutory and policy context

5.1 Resource Management Act

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management means:

“Managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social,

economic, and cultural well-being and for their health and safety while [emphasis added]

–

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

To realise this the Council is required, under ss73 and 74, to have at all times a District Plan for Wellington City that accords with its functions under s31 and Part 2 of the Act, including:

- Achieving integrated management of the effects of the use, development or protection of land and associated natural and physical resources;
- Ensuring that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the city;
- Controlling the effects of the use, development, or protection of land; including in respect of natural hazards, contaminated land and maintaining indigenous biodiversity;
- Controlling noise; and
- Controlling the effects of activities in relation to the surface of water in rivers and lakes.

Section 79(1) also requires the Council to commence a review of a provision in its operative district plan if the provision has not been subject to a review or change during the previous 10 years.

In preparing or changing its district plan the Council is required, under s74(2), to have regard to:

(a) any -

- (i) proposed regional policy statement; or*
- (ii) proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4; and*

(b) any –

- (i) management plans and strategies prepared under other Acts; and*
- (iia) relevant entry on the New Zealand Heritage List/Rārangī Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; and*
- (ii) regulations relating to ensuring sustainability, or the conservation, management, or sustainability of fisheries resources (including regulations or bylaws relating to taiapure, mahinga mataitai, or other non-commercial Maori customary fishing); and*

to the extent that their content has a bearing on resource management issues of the district; and

(c) the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.”

The Council needs to ensure that the plan gives effect to the following matters set out in s75(3):

- (a) *“any national policy statement; and*
- (b) *any New Zealand coastal policy statement; and*
- (ba) *a national planning standard; and*
- (c) *any regional policy statement”;*

and is consistent with *“a regional plan for any matter specified in section 30(1)”* under s75(4).

Under 74(2A) the Council must also *“take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of a region”*, while trade competition or the effects of trade competition are to be disregarded under s74(3).

Section 73(4) requires the Council to amend its district plan to give effect to a regional policy statement if:

- (a) *“the statement contains a provision to which the plan does not give effect; and*
- (b) *one of the following occurs:*
 - (i) *the statement is reviewed under section 79 and not changed or replaced; or*
 - (ii) *the statement is reviewed under section 79 and is changed or replaced and the change or replacement becomes operative; or*
 - (iii) *the statement is changed or varied and becomes operative”;*

with this needing to be actioned under s73(5):

- (a) *“within the time specified in the statement, if a time is specified; or*
- (b) *as soon as reasonably practicable, in any other case.”*

5.2 National Direction

5.2.1 National Planning Standards

Section 75(3)(ba) of the RMA requires District Plans to give effect to a national planning standard. The first set of standards came into force on 3 May 2019 and are centred around plan structure and format (e.g. chapter headings, arrangement of chapters and existing provisions, zone names, spatial layers, planning map colour palette and symbology) and definitions of commonly referenced terms.

The PDP has been prepared in accordance with these standards, noting the following:

Plan structure	<p>The PDP has been extended to accommodate relevant topics beyond the scope of the plan structure outlined in Standard 4, including:</p> <ul style="list-style-type: none"> • Three waters infrastructure • Hazardous substances • Viewshafts • Wind • The Wellington Town Belt • Quarries
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	<ul style="list-style-type: none"> • The Wellington waterfront
Definitions	The definitions in Standard 14 were relied on wherever applicable, supplemented by additional definitions as required to assist interpretation by plan users. More context for the additional definitions is provided in the relevant chapter to which they relate.
Zone framework	<p>The zoning framework adopted in the plan comprises the following:</p> <ul style="list-style-type: none"> • Six commercial zones: <ul style="list-style-type: none"> ○ a Neighbourhood Centre Zone (NCZ) ○ a Local Centre Zone (LCZ) ○ a Commercial Zone (COMMZ) ○ a Mixed Use Zone (MUZ) ○ a Metropolitan Centre Zone (MCZ) ○ a City Centre Zone (CCZ) • A General Industrial Zone (GIZ) • Three residential zones: <ul style="list-style-type: none"> ○ a Medium Density Residential Zone (MRZ) ○ a High Density Residential Zone (HRZ) ○ a Large Lot Residential Zone (LLRZ) • A General Rural Zone (GRUZ) • Four open space and recreation zones: <ul style="list-style-type: none"> ○ a Natural Open Space Zone (NOSZ) ○ an Open Space Zone (OSZ) ○ a Sport and Active Recreation Zone (SARZ) ○ a Wellington Town Belt Zone (WTBZ) • Nine special purpose zones: <ul style="list-style-type: none"> ○ an Airport Zone (AIRPZ) ○ a Corrections Zone (CORZ) ○ a Future Urban Zone (FUZ), supported by two development areas ○ a Hospital Zone (HOSZ) ○ a Port Zone (PORTZ) ○ a Quarry Zone (QUARZ) ○ a Stadium Zone (STADZ) ○ a Tertiary Education Zone (TERT) ○ a Waterfront Zone (WFZ)
Spatial layers	<p>In addition to zones the following spatial layers have also been used across the plan:</p> <ul style="list-style-type: none"> • Development Areas applying to the Kilbirnie Bus Barns, Lincolnshire Farm and Upper Stebbings and Glenside West • Overlays, including ones specifically applying to: <ul style="list-style-type: none"> ○ historic heritage, sites, and areas of significance to Māori, statutory acknowledgement areas and notable trees ○ natural hazards, including flood, liquefaction, and fault hazard risk ○ the coastal environment and coastal hazards, including tsunami, coastal erosion, and coastal inundation ○ viewshafts

	<ul style="list-style-type: none"> ○ noise ○ significant natural areas ○ outstanding natural features and landscapes, special amenity landscapes and ridgelines and hilltops ○ transmission lines and associated buffer areas ● A series of precincts, including ones specific to: <ul style="list-style-type: none"> ○ residential character areas ○ townscape values in the Mt Victoria North area ○ height in the Oriental Bay area ○ Te Ngākau Civic Square ○ Makara Beach and Village ○ Wellington Airport ○ the Inner Harbour Port area ○ the multi-user ferry facility ○ Kiwi Point quarry ● Specific controls, including area and site-specific controls applying to: <ul style="list-style-type: none"> ○ building height, verandah and street edge height ○ active and non-residential activity frontages
Appendices	<p>The inclusion of supporting appendices, including a series of design guides specific to the following topics:</p> <ul style="list-style-type: none"> ● Centres and mixed use ● Residential ● Heritage ● Signs ● Subdivision ● Rural
Electronic accessibility and functionality	<p>PDP content is displayed and accessible on the Council's website in an online interactive format (ePlan) and includes a keyword search functionality and hyperlinks to definitions and internal and external reference documents. There is also the ability for users to query the ePlan to display provisions that apply to specific properties and one or more specific activities.</p>

5.2.2 National Policy Statements

National Policy Statements (NPS) provide national direction for matters of national significance relevant to sustainable management. There are five NPSs currently in force that the PDP is required to give effect to under s75(3) of the RMA. These are:

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

5.2.2.1 NPS for Electricity Transmission 2008 (NPS-ET)

The NPSET came into force in April 2008 and, along with the National Environmental Standard for Electricity Transmission (NES-ET), sets out a suite of objectives, policies, and standards to manage the country's electricity transmission network, the National Grid.

The NPS-ET provides a high-level framework to guide the management and future planning of the National Grid, including:

- Acknowledging the national significance of the national grid, which has to be considered in local decision making on resource management plans and consent applications
- Providing guidance to local decision makers in managing the impacts of the transmission network on its environment
- Recognising the national benefits derived from electricity transmission, such as better security of electricity supply
- Guiding the management of adverse effects of activities from third parties on the grid, thereby reducing constraints on the operation, maintenance, upgrading and development of the grid
- Ensuring long-term strategic planning for elements of the National Grid

Detail on how the NPS-ET has been given effect to is contained in the s32 report for the Infrastructure topic.

5.2.2.2 New Zealand Coastal Policy Statement 2010 (NZCPS)

The NZCPS took effect in December 2010, replacing its 1994 predecessor, and is the only NPS mandated under the RMA. It recognises the important natural processes and development pressures around the coast and establishes a policy framework to achieve the purpose of the RMA within the coastal environment.

The NZCPS promotes a strategic and integrated approach to coastal planning and management with an emphasis on the following priority outcomes:

- Safeguarding the integrity, form, function, and resilience of the coastal environment and sustaining its ecosystems
- Preserving the natural character of the coastal environment and protecting natural features and landscape values
- Taking account of the principles of the Treaty of Waitangi, recognising the role of tangata whenua as kaitiaki and providing for tangata whenua involvement in managing the coastal environment
- Maintaining and enhancing the public open space qualities and recreation opportunities of the coastal environment
- Taking account of climate change, ensuring that coastal hazard risks are managed through a range of activities
- Enabling people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development
- Ensuring that management of the coastal environment recognises and provides for New Zealand's international obligations regarding the coastal environment, including the coastal marine area

Detail on how the NZCPS has been given effect to is contained in the s32 report for the Coastal Environment topic.

5.2.2.3 NPS for Renewable Electricity Generation 2011 (NPS-REG)

The NPS-REG recognises the importance of renewable energy and the role this plays in achieving the Government's target of 90 per cent of electricity from renewable sources by 2025.

It covers all the renewable electricity generation types (i.e. wind, geothermal, solar, biomass, marine) and applies to related activities at any scale including:

- small and community-scale renewable generation activities
- systems to convey electricity to the distribution network and/or the national grid
- electricity storage technologies associated with renewable electricity storage

It also covers the construction, operation and maintenance of structures associated with renewable electricity generation and provides for investigation activities such as wind masts and geothermal test bores.

Detail on how the NPS-REG has been given effect to is contained in the s32 report for the Renewable Electricity Generation topic.

5.2.2.4 NPS for Freshwater Management 2020 (NPS-FM)

The NPS-FM took effect in September 2020, replacing its 1994 predecessor. Along with the companion National Environmental Standards for Freshwater it establishes a framework of objectives, policies and standards to:

- Stop further degradation of New Zealand's freshwater resources and improve water quality within five years
- Reverse past damage and bring New Zealand's freshwater resources, waterways, and ecosystems to a healthy state within a generation

To achieve this the NPS-FM includes requirements focused on:

- Managing freshwater in a way that 'gives effect' to Te Mana o te Wai: (the integrated and holistic well-being of a freshwater body)
- Assigning priority to the health and wellbeing of water bodies and freshwater ecosystems, then the essential needs of people followed by other uses
- Establishing a national objectives framework, monitoring progress, and accounting for freshwater takes and contaminants
- Providing for the active involvement of tangata whenua in freshwater management and that Maori freshwater values are identified and provided for
- Improving degraded water bodies, and maintaining or improving all others through the application of 'bottom lines'
- Avoiding any further loss or degradation of wetlands and streams, mapping existing wetlands and encouraging their restoration
- Avoiding overallocation, improving and maximising the efficient allocation and use of freshwater and safeguarding its life-supporting capacity
- Improving integrated management of freshwater and the use and development of land

While many of the objectives and policies relate to the functions of regional councils, provisions relating to the management of the use and development of land to safeguard

freshwater are relevant to the PDP and will need to be implemented in close co-ordination with Greater Wellington Regional Council to avoid unintended overlap and duplication.

Detail on how the NPS-FM has been given effect to is contained in the s32 reports for the Three Waters, Ecosystems and Indigenous Biodiversity, Subdivision and Earthworks, Coastal Environment, Natural Character and Public Access, Infrastructure, and Natural Hazards topics.

5.2.2.5 NPS on Urban Development 2020 (NPS-UD)

The NPS-UD came into force in August 2020, replacing the National Policy Statement on Urban Development Capacity 2016. It recognises the national significance of:

- Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- Providing sufficient development capacity to meet the different needs of people and communities

In response the NPS-UD requires councils to plan well for growth, including:

- Ensuring urban development occurs in a way that takes into account the principles of the Treaty of Waitangi (te Tiriti o Waitangi)
- Ensuring that plans make room for growth both 'up' and 'out', particularly in locations that have good access to existing services, public transport networks and infrastructure, and that rules are not unnecessarily constraining growth
- Developing, monitoring, and maintaining an evidence base about demand, supply and prices for housing and land to inform planning decisions
- Aligning and coordinating planning across urban areas

It also directs Tier 1 urban areas¹ to free up available 'development capacity' to:²

- Meet projected growth requirements in their area over the short- (3 years), medium- (10 years), and long-term (30 years)
- Enable more homes to be built in response to demand that are close to jobs, community services, public transport, and other amenities valued by communities

The nature of the outcomes anticipated by this directive are highlighted by Policy 3 of the NPS-UD, with Tier 1 councils required to enable greater building height and density of development in urban areas including:

- (a) as much development capacity as possible in city centres
- (b) at least 6 storeys in metropolitan centres

¹ Tier 1 urban areas identified in the NPS-UD include Auckland, Hamilton, Tauranga, Wellington and Christchurch

² Refer Policy 2, NPS-UD, with 'development capacity' defined as: the capacity of land to be developed for housing or for business use, based on:

- a. the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
- b. the provision of adequate development infrastructure to support the development of land for housing or business use.

- (c) at least 6 storeys within the walkable catchment of existing and planned rapid transit stops and on the edge of city and metropolitan centres

Section 7.4 of this report outlines how the PDP meets the requirements of the NPS-UD at a city-wide scale. It also sets out the development capacity provided by the PDP. More specific detail about the how the NPS-UD has been given effect to through zone-specific objectives, policies, rules and other methods is contained in the s32 reports for the relevant chapters.

5.2.3 National Environmental Standards

In addition to the NPSs outlined above there are also nine National Environmental Standards (NES) currently in force that prescribe technical and non-technical standards, methods or other requirements that district plans need to accord with to ensure a consistent standard for an activity or resource use. These include:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

Unless otherwise specified the requirements set out in these regulations prevail over any provisions contained in a district plan. The NESs of particular relevance to the PDP are outlined below.

5.2.3.1 NES for Electricity Transmission Activities 2009 (NES-ET)

The NES-ET sets out a national framework of permissions and consent requirements for activities on existing high voltage electricity transmission lines. This includes operational, maintenance and upgrade activities, some of which are permitted subject to conditions to control associated environmental effects. Resource consent requirements for electricity transmission activities that fail to meet the terms and conditions for permitted activities are also specified, including matters of control and discretion for controlled and restricted discretionary activities respectively.

The NES-ET does not apply to the construction of new transmission lines or to substations, nor does it apply to electricity distribution lines that carry electricity from regional substations to electricity users.

Detail on how the PDP accords with the NES-ET is contained in the s32 report for the Infrastructure topic.

5.2.3.2 NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)

The NES-CS contains a nationally consistent set of planning controls and soil contaminant values that need to be observed and enforced by territorial authorities. It aims to ensure that land affected by contaminants in soil is appropriately identified and assessed prior to being

developed and, if necessary, is remediated or the contaminants suitably contained to make the land safe for human use.

Detail on how the PDP accords with the NES-CS is contained in the s32 report for the Contaminated Land and Hazardous Substances topic.

5.2.3.3 NES for Telecommunication Facilities 2016 (NES-TF)

The NES for Telecommunication Facilities allows network operators to install some low impact telecommunication infrastructure in road reserves without the need to apply for resource consent, subject to meeting specified standards and conditions. These include:

- Cabinets in the road reserve, outside the road reserve and on buildings
- Antennas on existing poles in the road reserve
- Antennas on new poles in the road reserve
- Replacement, upgrading and co-location of existing poles and antennas outside road reserve (with different conditions in residential and non-residential areas)
- New poles and antennas in rural areas
- Antennas on buildings (above a permitted height in residential areas)
- Small-cell units on existing structures
- Telecommunications lines (underground, on the ground and overhead)

Detail on how the PDP accords with the NES-TF is contained in the s32 report for the Infrastructure topic.

5.2.3.4 NES for Plantation Forestry 2017 (NES-PF)

The NES-PF seeks to maintain and improve the environmental outcomes of plantation forestry nationally and to increase certainty and efficiency in managing plantation forestry activities. The regulations cover eight core plantation forestry activities:

- Afforestation
- Pruning and thinning to waste
- Earthworks
- River crossings
- Forest quarrying
- Harvesting
- Mechanical land preparation
- Replanting

Under the NES-PF councils can apply stricter rules to these activities in specific circumstances to manage locally significant or sensitive areas.

Detail on how the PDP accords with the NES-ET is contained in the s32 reports for the Ecosystems and Indigenous Biodiversity and Natural Features and Landscapes topics.

5.3 Regional Direction

5.3.1 Regional Policy Statement for the Wellington Region 2013

Under s75(3) of the RMA the PDP needs to give effect to the Regional Policy Statement for the Wellington Region (RPS).

The RPS provides an overview of the significant resource management issues affecting the region, and sets out a series of objectives, policies, and methods to address these issues and to achieve integrated management of the region's natural and physical resources. In particular the RPS includes a set of 34 policies that the PDP is required to give effect to (Policies 1-34) and a further 26 that need to be considered (Policies 35-60) – Policies 1-34, along with their corresponding objectives. Each of the zone and topic section 32 reports that form Part Two of this evaluation report provide an assessment of the relevant RPS related objectives and policies.

Policies 61–63 further underline the relative allocation responsibilities of the Regional Council and constituent territorial authorities in terms of land use controls relating to indigenous biodiversity, natural hazards, and hazardous substances, with Wellington City Council responsible for developing objectives, policies, rules and/or methods to control:

- The use of land, excluding land within the coastal marine area and the beds of lakes and rivers, for the purposes of maintaining indigenous biological diversity (Policy 61)
- Land use for the purposes of avoiding or mitigating natural hazards on land, other than in the coastal marine area and the beds of lakes and rivers (Policy 62)
- Hazardous substance use on land, other than in the coastal marine area and the beds of lakes and rivers (Policy 63)

5.3.2 Regional Plans

Under s74(4) of the RMA, the PDP needs to be consistent with any regional plan/s currently in force.

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

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

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative apart from those that are subject to appeal. Detail relating to the consistency of the PDP with these provisions is contained in the individual topic related evaluations that form Part Two of this evaluation report.

6.0 Partnership with Taranaki Whānui and Ngāti Toa Rangatira

6.1 Mana Whenua Acknowledgement

6.1.1 Taranaki Whānui

The Council acknowledges Taranaki Whānui as Mana Whenua. The Council works in partnership with Taranaki Whānui and engages through the iwi authority, the Port Nicholson Block Settlement Trust.

As Mana Whenua of Wellington, Taranaki Whānui are afforded rights and responsibilities through Te Tiriti o Waitangi/The Treaty of Waitangi and the RMA that the Council accommodates. The Council has a Memorandum of Understanding (MOU) with the Port Nicholson Block Settlement Trust and a mutually beneficial relationship whereby Taranaki Whānui are included in decision-making processes that affect them (e.g. resource management, active protection).

6.1.2 Ngāti Toa Rangatira

The Council acknowledges Ngāti Toa Rangatira as mana whenua. The Council works in partnership with Ngāti Toa Rangatira, and engages through the iwi authority, Te Rūnanga o Toa Rangatira.

As Mana Whenua of Wellington, Ngāti Toa are afforded rights and responsibilities through Te Tiriti o Waitangi/The Treaty of Waitangi and the RMA that the Council accommodates. The Council has a MOU with Ngāti Toa Rangatira and a mutually beneficial relationship whereby Ngāti Toa are included in decision-making processes that affect them (e.g. resource management, active protection).

6.2 Relationship with Wellington City Council

6.2.1 Taranaki Whānui

The Council has a history of formal MOU's with the Port Nicholson Block Settlement Trust (Taranaki Whānui). Tākai Here (2022) is a new partnership agreement recently signed by our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa groups and Wellington City Council on 29 April 2022. It sets a framework for the ways the Council and mana whenua will work together for the benefit of the city and region. It replaces separate memoranda of understanding signed by the Council in 2017.

The Council also acknowledges Taranaki Whānui as kaitiaki (guardians of the land), with the right to practice kaitiakitanga and to provide for their traditional and cultural values. This is progressed through ensuring that its contribution to Wellington's heritage and future is fully and publicly acknowledged and by working closely with them to explore opportunities for the city regarding settlement of their Te Tiriti o Waitangi/Treaty of Waitangi claims. An example of the partnership Council has with Taranaki Whānui is co-hosting annual Waitangi Day celebrations with the Port Nicholson Block Settlement Trust.

6.2.2 *Ngāti Toa Rangatira*

As mentioned above, the Council has a formal MOU with Ngāti Toa Rangatira called Tākai Here (2022).

The Council also acknowledges Ngāti Toa Rangatira as kaitiaki (guardians of the land), with the right to practice kaitiakitanga and to provide for their traditional and cultural values. This is progressed through ensuring that its contribution to Wellington's heritage and future is fully and publicly acknowledged and by working closely with them to explore opportunities for the city regarding settlement of their Te Tiriti o Waitangi/Treaty of Waitangi claims.

6.3 Treaty Settlements

6.3.1 *Taranaki Whānui*

The Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act received Royal Assent on 4 August 2009 and took effect on 5 August 2009.

It represents the final settlement of all historical Taranaki Whānui ki Te Upoko o Te Ika Treaty of Waitangi claims and includes:

- An agreed historical account and Crown acknowledgements, which form the basis for a Crown Apology to Taranaki Whānui, as well as a Statement of Forgiveness from Taranaki Whānui to the Crown
- A cultural redress package that recognises the traditional, historical, cultural and spiritual association of Taranaki Whānui with places and sites owned by the Crown within their area of interest
- Financial and commercial redress

6.3.2 *Ngāti Toa Rangatira*

The Ngāti Toa Rangatira Claims Settlement Act received Royal Assent 22 April 2014 and took effect on 23 April 2014.

It represents the final settlement of all historical Ngāti Toa Rangatira Treaty of Waitangi claims and includes:

- An agreed historical account and Crown acknowledgments which form the basis for a Crown apology to Ngāti Toa Rangātira
- A cultural redress package that recognises the traditional, historical, cultural and spiritual association of Ngāti Toa Rangatira with places and sites owned by the Crown within their area of interest
- Financial and commercial redress

6.4 Proposed District Plan Input

The PDP has been developed in partnership with Taranaki Whānui and Ngāti Toa Rangatira.

The District Plan Review has involved significant engagement with mana whenua (Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira) over the last 12 months. This has included more than 100 hui and wānanga for officers to understand what needs to change in

the PDP and how the provisions can better integrate consideration of mana whenua values. 124. This supports the Council's statutory obligations in relation to Te Tiriti o Waitangi and the RMA.

A summary of these meetings and advice received is contained in 'Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira'.

Engagement with mana whenua on the District Plan Review and PDP will be an ongoing process and will continue to involve organised wānanga and hui, and regular feedback on progress.

7.0 Planning Context and Policy Framework

7.1 Wellington Planning Context

Demographics

Wellington City has a population of 211, 200³ It is estimated that 50,000 to 80,000 more people will move to Wellington over the next 30 years.

The age structure of the population is also trending toward an ageing population with a higher number of the population aged between 20 and 50 years compared to the rest of New Zealand. Lifestyle preferences are therefore changing, including where people want to live and how they move around the City.

Housing supply, choice, and affordability

As a result of this expected population growth and changes in the City's demographic structure, there will be increased demand for a greater number of dwellings, of a smaller size, close to employment, key services, and public transport over the next 30 years. However, the City is already experiencing a housing shortage and house prices have increased rapidly over the last five years. Rents have also become increasingly unaffordable.

A key factor that has contributed to the City's current housing issues is housing supply. Since the year 2000, population growth in Wellington has outstripped the number of dwellings constructed and this trend is expected to continue⁴.

As set out in the 2022 HBA update:

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

³Stats NZ (2018) New Zealand Census

⁴ Refer Wellington Regional Housing and Business Development Capacity Assessment (2022).

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

The City's housing issues, along with those of other similar sized Cities nationally, has been a catalyst for the development of national direction by Central Government to significantly increase capacity. The requirements of the NPS-UD (outlined above in section 5.2.2.5), alongside the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 aim to significantly increase housing capacity. Both of these instruments direct local authorities to make significant changes to their planning settings to enable more housing.

Business and Employment

Alongside the need to provide sufficient capacity for housing, there is also a need to ensure sufficient capacity for business and commercial activities to support the local economy and employment opportunities. The City is estimated to require more than 23 hectares of land and 78 hectares of floor space over the next 30 years to meet future commercial and business development demand.

A range of business and commercial areas are already provided across the City, with the central city being the economic and employment hub for the wider Wellington region and metropolitan and suburban centres complementing this. The HBA 2019 shows that the City has sufficient supply of commercial land and floor space to meet this expected demand. However, it is important that the Proposed District Plan settings ensure that this capacity is retained.

In addition to the business and commercial activities in the City Centre and suburban centres, there are a number of strategic assets across the City which play a key role in the City's economy, employment and health and education needs. These include the Port, Wellington International Airport, Wellington Regional Hospital, Victoria University of Wellington, and Massey University. These important assets will be a key part of the City's future and it is important that they are recognised and provided for in the planning framework.

Climate Change and Sea Level Rise

The Council declared a Climate and Ecological Emergency in June 2019. At the same time, the Council adopted Te Atakura First to Zero, the City's blueprint for reaching net zero carbon emissions by 2050. As such, the issues of climate change adaptation, ecological protection, and reducing emissions are a high priority for the Council.

The City's urban form is a key factor in how well the City adapts to the effects of climate change and reducing its impacts. Wellington already has a compact urban due to its topography. There is a strong desire from the community to retain this compact form and ensure that the majority of new development occurs in the existing urban area and in locations that support a reduction in the City's carbon emissions. This includes areas that are well served by public transport, employment, and other key services.

Urban form also influences how people move around the city, and vice versa. Alongside a desire to intensify within the existing urban area, there is a need to reduce reliance on private vehicles (the City's largest source of emissions). Existing planning settings are largely still based around the private vehicle as people's main mode of transport. To reach the City's target of net zero emissions by 2050, the emphasis will need to change to

encouraging greater uptake of active transport modes, particularly cycling. Significant investment in the City's bike network is planned for the next 10-20 years and this will need to be supported by appropriate planning policies.

Natural Hazard Risks

Wellington City is vulnerable to a number of natural hazard risks including:

- fault rupture
- tsunami
- flooding
- coastal inundation
- slope instability, and
- liquefaction.

This means that future development and infrastructure planning will need to carefully consider how the risks associated with these hazards will be reduced or avoided.

Since the Kaikoura earthquake in 2016, there has been a renewed focus on building a more resilient city. The loss of several central city buildings due to damage from that event has provided the City with useful insight into ground conditions and construction methods that will need to be used in the future. It has also enabled the Council to better understand where risks can be mitigated, where development costs may be higher, and where future development may be inappropriate.

The risks associated with other hazards, such as sea level rise, flooding, and coastal erosion, have also come to the fore over the last decade as more information and data has become available. There is also much more evidence about the impacts of climate change. There is a strong directive at both the central and local government levels that these risks be addressed in the planning framework.

Integrating Land Use and Transport planning

Transport is a critical factor in the City's urban form and is closely tied to where and how urban development occurs. The City's growth will place pressure on the transport system and how we provide for that growth and development will impact on the efficiency of the transport system.

The ability of the City to reduce its carbon emissions to net zero by 2050 is also heavily dependent on a shift away from private vehicle use toward more sustainable forms of transport. More than one third of the City's greenhouse gas emissions are from road transport⁵.

The NPS-UD now requires the District Plan to enable higher density developments around rapid transit stops. This supports a more transit-oriented approach to accommodating growth and in turn will support greater uptake of public transport. This is in turn supported by a number of other Council initiatives that aim to facilitate a shift to active transport modes to complement public transport. This includes significant investment in the City's bike network

⁵ Refer Te Atakura First to Zero: Wellington's blueprint for a Zero Carbon Capital (2019), pg.53

along with initiatives to support the use of micro-mobility devices such as e-scooters and e-bikes.

The Let's Get Wellington Moving (LGWM) programme⁶ is also a key part of the City's future urban form and function. The associated work programme focuses on public transport, walking and cycling and strategic highway improvements, with a parallel emphasis centred around unlocking urban development opportunities and improving urban amenity in those areas where works are proposed. A future mass rapid transit route will also facilitate mixed use and higher density developments around stations.

LGWM's overall focus on integrating land use with transport investment will also act as a catalyst to deliver higher density elsewhere in the city, including areas to the south and east of the central city (e.g. Hataitai, Kilbirnie, Island Bay). These investments will make it easier for more Wellingtonians to choose low carbon forms of transport for everyday trips. It is important that the District Plan settings and future decisions align with these outcomes.

Infrastructure to support Growth

Infrastructure is essential for a well-functioning urban environment. The provision of adequate infrastructure can determine the viability of a development. Meeting the City's housing shortfall will place pressure on the City's existing infrastructure networks which are already at or near capacity. The City faces a number of challenges in this area including:

- The need for significant investment, particularly in the three waters and transport networks, to upgrade and replace ageing infrastructure.
- Phasing investment in infrastructure in a way that enables growth but remains affordable for the City
- Ensuring the City's infrastructure networks are resilient to cope with the impacts of natural hazards and climate change.
- Increasing the capacity of the infrastructure network to accommodate future growth

The Spatial Plan is an important strategy that has guided the development of the PDP and the associated provision of key infrastructure. This is discussed in more detail below in section 7.2.

The Long Term Plan 2021-31 (LTP) sets out the plan for funding and investment for growth-related infrastructure over the next 10 years. The LTP was adopted by the Council in June 2021 and was developed in parallel with the Spatial Plan.

The LTP and the Spatial Plan have taken a strategic and targeted approach to infrastructure investment delivery over the short to medium and longer term. Over the next ten years significant investment will be focused on enabling capacity to support growth in the Central City (including Te Aro and Adelaide Road), Newtown, Johnsonville, and Tawa.

The LTP also identifies funding for Wellington Water Ltd (WWL) to undertake detailed three waters growth studies this year - starting with studies for the Central City/Newtown/Island Bay corridor and the northern suburbs (Johnsonville, Newlands, Tawa) – to inform investment planning advice for the 2024-34 LTP (or the new water entity).

⁶ Let's Get Wellington Moving is a joint initiative between Wellington City Council, Greater Wellington Regional Council, Waka Kotahi NZ Transport Agency, and mana whenua.

Following the completion of these studies, detailed investigations will commence for the next tranche of growth areas in the Spatial Plan – for example, the remaining suburbs in Southern Wellington, Western Wellington (Ngaio, Crofton Downs, Khandallah), Eastern Wellington, and Karori. These detailed studies, and any subsequent business cases, are important as they will enable the identification, development, planning and prioritising of specific three waters growth projects that deliver capacity improvements in the network.

Alongside investment in the 3 waters infrastructure, there are PDP requirements to manage land-use and ensure there is three waters capacity for new development, and where necessary, appropriate on-site mitigation and stormwater management for new development. These matters are addressed in the Three Waters Section 32 Report.

Partnership with Mana Whenua

Mana whenua of Te Whanganui ā Tara are Taranaki Whānui and Ngāti Toa Rangatira. The mana whenua status of both Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira to the Wellington City area is recognised by Wellington City Council.

As noted above, the Council has Memoranda of Understanding with both Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira which provides the foundation for a partnership between the Council and mana whenua. This also recognises the traditional and ancestral connection to the area of Te Whanganui-a-Tara for mana whenua.

The ODP does not sufficiently recognise the status of mana whenua, nor does it sufficiently acknowledge or protect mana whenua values.

The development of a new District Plan is an opportunity to ensure that the values, goals, and aspirations of mana whenua are incorporated into the planning framework and decision-making process. This includes involvement in the development of District Plan provisions, facilitating mana whenua housing initiatives, incorporating important traditional cultural elements into the City environment, and protecting sites and areas that are of significance to mana whenua.

Natural environment

Wellington City's natural environment is a key defining element of the City's identity and sense of place. The City's extensive natural open space in close proximity to the urban area is highly valued by the community. This balance of natural and built form also contributes to residents' health and wellbeing. Retaining and enhancing the City's natural environment as the City grows is a key priority for the Council.

There is a renewed focus on protecting the natural environment, including:

- Important areas of indigenous biodiversity – on public and private land
- Water quality in freshwater and in the harbour
- Highly valued landscapes and natural features.

New national direction is being developed in relation to protecting indigenous biodiversity, and the National Policy Statement on Freshwater Management sets specific directions to maintain and improve water quality. Mana whenua also consider the relationship with biodiversity is an intrinsic and important part of their responsibilities as kaitiaki within their

whaitua/rohe/takiwā. As mana whenua they encourage collaboration and partnership to ensure that together we care for the environment entrusted to us.

Protecting the City's built heritage and special character

Wellington City has a significant amount of built heritage that contribute to the City's identity. This heritage helps to tell the story of the City's development over time and provides a sense of place. The ongoing protection of the City's heritage is a priority for the community and the RMA 1991 includes the protection of historic heritage as a matter of national importance (section 6(f)).

There is a strong desire to ensure the City's heritage buildings are seismically strong in the future to ensure their ongoing use. This can pose a challenge for building owners where the costs of upgrades are high and the need to ensure the heritage values of the building are retained. The Council continues to work with building owners through the process, and the Built Heritage Incentive Fund has had a focus on assisting owners who are undertaking seismic upgrades.

The need for more housing, particularly in the central city, and ongoing resilience issues will place pressure on the City's heritage stock. However, it is important that a balance is struck between meeting growth needs and continuing to protect this important resource.

In addition to the City's listed historic heritage, the inner suburbs are currently recognised for their special character. The ODP includes 'pre-1930 character areas' that apply to the majority of the inner suburbs⁷. The rules that relate to these character areas seek to protect the concentration of dwellings that were constructed prior to 1930 and the resultant streetscape character that this concentration provides. Resource consent is required for the demolition of any pre-1930 dwelling in these character areas, or for additions and alterations to the primary form of these dwellings. These rules apply to approximately 5,500 properties in the inner suburbs.

The character of these areas is highly valued by many members of the community, particularly those that live within the areas.

A key challenge today is providing for more housing in areas that are close to the city centre and other key services, while also recognising the special characteristics in these areas. This is particularly the case given the requirements of the NPS-UD.

Providing liveable urban environments

While there is a need to increase the quantity of housing across the City, it is important to ensure that this is quality housing that is supported by public transport, community facilities, parks and open space, and other key services. A challenge in the current context is ensuring that new housing is well-designed while also being affordable.

The ODP includes a strong emphasis on good design, primarily through the Design Guides. Changes to the plan since its inception have sought to manage the effects of new development on neighbourhood amenity, in particular infill development through Plan

⁷ Mt Victoria, Thorndon, Aro Valley, Holloway Road, the southern end of The Terrace, Mt Cook, Newtown, and Berhampore.

Change 56. This has had the effect of limiting the ability to develop sites for more housing, with infill dwelling units limited to 1 storey.

At the same time, the plan does not include any provisions relating to internal residential amenity for new apartment developments. The City has a number of apartment complexes that are solely made up of small studio and 1 bedroom apartments with poor amenity for residents such as limited daylight or sunlight access ('windowless rooms') and lack of outdoor living space.

National direction and the recent changes to the RMA demonstrate a shift away from a focus on protecting amenity, towards a focus on 'well-functioning urban environments'. The Council has considered this direction in reviewing the ODP and has sought to strike a balance between enabling more housing and providing a good standard of residential amenity in the broadest sense. In the Council's view, amenity is not limited to matters at the individual site level, but also includes matters such as proximity to community services, schools, public transport, and open space that contribute to overall liveability outcomes.

7.2 Our City Tomorrow: A Spatial Plan for Wellington City

In June 2021, WCC adopted the City's 30 Year Spatial Plan – *Our City Tomorrow – He Mahere Mokowā mō Pōneke A Spatial Plan or Wellington City 2021* ('the Spatial Plan'). The Spatial Plan is a key guiding document for the PDP, setting out where and how the City will grow in the future. The Spatial Plan replaced the previous 'Urban Growth Plan' and was developed in line with the NPS-UD 2020. It is important to note that the Spatial Plan does not reflect the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

In summary, the Spatial Plan addresses the City's key challenges and opportunities as follows:

Enabling more housing

The Spatial Plan sets out a new growth pattern for the City compared to earlier growth strategies. This new growth pattern sees future growth concentrated in and around the City Centre, suburban centres, and around public transport stops. Limited greenfield growth is provided for. This differs from the previous approach of focusing growth along a growth spine from the City's north to the Airport.

The Spatial Plan takes a City-wide approach to providing for more housing as follows:

- Enabling development of at least 6 storeys in the following locations:
 - Within 15 minutes' walking distance of the City Centre
 - Within 10 minutes' walking distance of:
 - Johnsonville metropolitan centre
 - All train stations along the Johnsonville train line, and all train stations in Tawa along the Kāpiti train line
- Increasing building heights in Te Aro from 8 storeys to 10 storeys
- Increased building heights in and around other suburban centres commensurate with the amenities provided in those centres.

As noted above, the WCC Planning and Environment Committee decision of 23 June 2022 relating to the decision to notify the Proposed District Plan included the following changes to the Walking catchments identified in the Spatial Plan:

- City Centre Zone – Reduced from 15 minutes to a 10 minutes walking catchment
- The removal of walking catchment requirements for stations along the Johnsonville Line, which includes Crofton Downs, Ngaio, Awarua St, Simla Cres, Box Hill, Khandallah, and Raroa Stations
- The retention of Tawa and Johnsonville train stops with a walking catchment of 10 minutes.

The growth approach of the Spatial Plan represents a significant shift in how growth is provided for and, when implemented in full, will uplift large areas of the City for housing.

Protecting pre-1930s character

A significant decision through the development of the Spatial Plan was to direct the removal of character protection from large areas of the inner suburbs in the PDP. This decision was made in order to provide more opportunities for development close to employment and services.

The Spatial Plan sets out a more targeted approach to the protection of pre-1930 character houses in the PDP, via 'character precincts', so that demolition of pre-1930 dwellings is restricted in areas where there is a concentration of high contributing dwellings, rather than the blanket approach of the ODP where the rules apply regardless of quality, contribution or building condition. Outside of these character precincts, development of at least 6 storeys would be enabled.

Infrastructure

Further to 7.1 above, the Spatial Plan sets out an approach to staging the City's investment for infrastructure upgrades over the next 30 years. This is in recognition of the City's infrastructure constraints, alongside the need to implement the NPS-UD. A staged approach is recommended for infrastructure investment, based on a number of factors, including:

- the directives of the NPS-UD (particularly as these relate to the City Centre, Johnsonville and other walkable catchment areas), the nature and scale of local infrastructure issues and constraints and other key development challenges
- local resilience issues
- the amount of additional growth anticipated in the area
- Council and other partner landholding and development interests in the area
- Investment identified in the Council's Long-Term Plan and the Financial and Infrastructure Strategy.

The Spatial Plan does not recommend that Karori be zoned for further intensification in the short to medium term due to the significant infrastructure constraints the suburb faces (in particular wastewater and transport)⁸.

⁸ It is noted that this approach has now been superseded in part by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This legislation will mean that the PDP must allow 3 dwellings on a site as of right.

Natural Environment

The Spatial Plan recognises that the City's growth must be supported by mechanisms to protect the City's natural environment and indigenous biodiversity. The community has highlighted the importance of the natural environment to the City's liveability throughout the various consultation and engagement processes in the development of both the Spatial Plan and the PDP. Retaining the City's natural and open spaces is also an important tool in responding and adapting to climate change and reducing carbon emissions.

The key actions that the Spatial Plan sets out to protect the natural environment include:

- The identification and introduction of rules in the new District Plan to protect indigenous biodiversity, outstanding natural features and landscapes, and landscapes that contribute to the amenity and quality of the city's natural environment
- Design guidance to ensure that new subdivision and development positively responds to the topography and landscape, protects waterways and ecosystems and connects to the City's reserves, parks and open spaces
- Introducing measures to ensure good site development practices to reduce impacts on the natural environment including the incorporation of water sensitive design methods in new development.

Historic Heritage protection

The Spatial Plan provides the following direction in relation to protecting the City's historic heritage:

- continue to protect important heritage buildings, sites, areas, objects, and notable trees in the District Plan,
- undertake heritage assessments for buildings, sites, areas, and notable trees, including sites of significance to Māori, which have been identified as having potential historic heritage values that may warrant protection through the District Plan

Natural Hazards and Adapting to Climate Change

The Spatial Plan recognises the risks associated with natural hazards and sea level rise in Wellington City. As such, it directs:

- that areas within the city that are susceptible to natural hazards and sea level rise be clearly identified, including updating current modelling and mapping of:
 - Flooding hazards
 - Tsunami
 - Active earthquake fault mapping
 - Liquefaction and soil classification
 - Coastal erosion and inundation
- that a specific natural hazards chapter and associated rules be developed in the PDP to limit or manage new subdivision, use and development in hazard prone areas, relative to the level of risk presented.
- the enabling of new buildings to be constructed that are safe and built with risk in mind, including the long-term impacts of climate change
- the creation of a more resilient building stock through the ongoing seismic strengthening of at-risk buildings and structures, including Council-owned buildings and structures.

- Investment in making the City’s key infrastructure assets more resilient.
- Improving our water systems through ecological interventions.
- Promoting and enhancing opportunities for public and active transport modes throughout the city.
- Identifying and enabling places and spaces throughout the city where local communities can come together and support one another.

7.3 Other Key Contributors

The Operative District Plan

The operative Wellington City District Plan (the ODP) was first proposed in 1994. At the time, a strong effects-based planning approach was prevalent in New Zealand planning due to the new Resource Management Act which was introduced in 1991. This effects-based planning approach was therefore reflected in the 1994 proposed District Plan. The ODP was made operative in 2000.

Since becoming operative, 83 plan changes have been made to the ODP. These plan changes range in complexity from minor ‘rats and mice’ changes through to larger, topic-based or chapter reviews such as Plan Change 48 (Central Area review) and Plan Change 72 (Residential Review).

The ODP reflects the period in which it was drafted where Wellington’s growth was low relative to more recent trends. While many of the resource management issues dealt with in the ODP are still present (e.g. retaining a compact city; historic heritage protection) there are many new issues that have emerged over the last decade that warrant due consideration in the District Plan. This includes:

- *Ensuring sufficient development capacity for housing over the next 30 years* – the ODP has not kept pace with demand for housing in Wellington City, nor does it sufficiently enable housing choice. The ODP includes 2 areas for Medium Density development in the Outer Residential Area (Johnsonville and Kilbirnie), but uptake has been slow due to both market factors and the policies and rules that apply in these areas which have had the effect of limiting yield.
- *Facilitating the provision of more affordable housing* – the ODP is silent on the issue of housing affordability, yet this is one of the City’s biggest issues with high house prices and rents.
- *Ensuring the City’s natural environment is sufficiently protected.* While the ODP does include protection for areas of natural open space and conservation areas, this is not sufficient to give effect to the Regional Policy Statement or section 6(c) of the RMA. The protection of significant natural areas, outstanding natural features, outstanding natural landscapes, and significant amenity landscapes is not currently included in the ODP. There are not only statutory requirements to protect these areas and features, but there are multiple benefits from protecting and retaining these areas including:
 - the City’s ability to adapting to climate change
 - responding to, and potentially reversing, the City’s ecological emergency (declared alongside a Climate Emergency in June 2019 by the Council)

- managing the effects of intensification by protecting connections to important features of the natural environment – ecological, experiential, and visual connections.
- *Updating the approach for managing natural hazard risks.* The ODP natural hazard provisions are based on outdated data and do not adequately support an assessment of the risks associated with different hazards. Some natural hazards are not addressed in the ODP, including sea level rise. This plan review has therefore provided an opportunity to obtain more robust information to inform new planning settings that adequately consider hazard risks.

These key issues reflect how the City has evolved since the ODP was drafted alongside the increased prevalence of natural hazards, climate change, and a shift to more sustainable Cities both nationally and globally. Recent national direction (outlined in section x of this report) and the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 also require a change in approach.

Te Atakura: First to Zero

Te Atakura is the City's blueprint for achieving net zero carbon emissions by 2050. The District Plan will play a key role in the ability of the City to achieve this goal. The key areas of focus for the District Plan review in this regard have been:

- Retaining a compact city – intensification in the existing urban area and limiting new greenfield development;
- Reducing the need to travel by private vehicle – removing on-site car parking requirements, providing for alternative and active modes of transport (e.g. bike parking, walking, micro-mobility, electric vehicle charging points).
- Protecting and enhancing the City's biodiversity – recognising that protecting existing areas and planting more trees plays a significant role as carbon sinks.
- Encouraging sustainable building design and ecologically sensitive development through the Design Guides.

Housing Strategy 2018

The Council's Housing Strategy sets out a range of initiatives to address the City's housing needs. The Strategy looks across the housing spectrum from emergency housing through to private ownership. The District Plan review, and in particular increasing housing choice and supply, is a key initiative to support the achievement of the Strategy's outcome of 'All Wellingtonians well-housed.'

Let's Get Wellington Moving

Let's Get Wellington Moving (LGWM) is a joint initiative between Wellington City Council, Greater Wellington Regional Council, and Waka Kotahi New Zealand Transport Agency, and mana whenua. It covers the area from Johnsonville to Miramar, including the Wellington Urban Motorway, and connections to the central city, Wellington Regional Hospital, Wellington Airport and Port, and the eastern, southern, and western suburbs.

LGWM's vision is: *"A great harbour city, accessible to all, with attractive places, shared streets, and efficient local and regional journeys. To realise this vision, we need to move more people with fewer vehicles."* This recognises that future population growth will put

pressure on the City's transport network and changes are needed to support a range of benefits including:

- Retaining a compact city
- Reducing the City's carbon emissions
- Creating a more accessible and efficient public transport system
- Creating better connections between the Central City and the Airport and surrounding suburbs.

The programme seeks to integrate transport and urban development initiatives including:

- a future mass rapid transit system connecting the central railway station to the southern and eastern suburbs
- identifying opportunities to unlock urban development opportunities in close proximity to the mass rapid transit route, including upzoning
- urban design initiatives to support a more attractive public realm, particularly in those areas where works are proposed
- supporting 'mode shift' by creating a more connected cycleway network and slowing vehicle traffic in the Central City to create a safer, and more pedestrian-friendly street environment.

In 2021, LGWM consulted with the community on 4 options for mass rapid transit. In July 2022 Central Government, WCC, and GWRC announced the intention to develop detailed business cases for route designations and station locations, with a preferred MRT route from the Central City to Island Bay.

Once the route, mode and station locations are confirmed, district plan changes will likely be needed to enable the higher density, mixed use developments near MRT stations. This could be a combination of upzoning and designation requirements. The timing of these changes will depend on the planning and consenting approach chosen and the overall LGWM schedule. The ISPP related parts of the PDP will likely be operative Q4 2023/Q1 2024, with the rest of the PDP made operative once appeals to the Environment Court are resolved.

Aside from the intensification opportunities around future stations LGWM's overall focus on integrating land use with transport investment will also act as a catalyst to deliver higher density elsewhere in the city, including areas to the south and east of the central city (e.g. Hataitai, Kilbirnie, Island Bay). Much of this will already be provided for in the PDP as a result of the MDRS requirements and decisions of Council through the Spatial Plan process to enable intensification in and around suburban centres.

Long Term Plan 2021-31 + Infrastructure Strategy

The Planning for Growth Programme is a priority programme within the Council's 2018-28 and 2021-31 Long Term Plans (LTPs). The 2021-31 LTP has been developed on the basis of the following long-term strategic vision:

'Wellington 2040 – an inclusive, sustainable and creative capital for people to live, work and play.'

The vision is supported by four community outcomes, in line with the four dimensions of wellbeing:

- **Environmental** – a sustainable, climate friendly eco-capital. A city where the natural environment is being preserved, biodiversity improved, natural resources are used sustainably, and the city is mitigating and adapting to climate change – for now and future generations.
- **Social** – A people friendly, compact, safe and accessible capital city. An inclusive, liveable, and resilient city where people and communities can learn, are connected, well housed, safe and healthy.
- **Cultural** – an innovative, inclusive and creative city. Wellington is a vibrant, creative city with the energy and opportunity to connect, collaborate, explore identities, and openly express, preserve and enjoy arts, culture and heritage.
- **Economic** - A dynamic and sustainable economy. The city is attracting and developing creative talent to enterprises across the city, creating jobs through innovation and growth while working towards an environmentally sustainable future.

To support the long-term outlook of the four community outcomes, the Council will be focussing on the following priority objectives over the next 3 years of the LTP:

1. A functioning, resilient and reliable three waters infrastructure
2. Wellington has affordable, resilient and safe housing
3. The city's core transport infrastructure is a safe, resilient, reliable network
4. The City has resilient and fit-for-purpose community, creative and cultural spaces
5. An accelerating zero-carbon and waste-free transition
6. Strong partnerships with mana whenua

The District Plan plays a key role in achieving each of these objectives, across a range of topics, including:

- Managing the impacts of land use and subdivision on the three waters network, and ensuring new development can be serviced
- Enabling sufficient housing supply and choice across the City
- Managing the risks associated with natural hazards
- Ensuring residential, commercial and industrial activities are appropriately supported by other key services such as community services, public transport, and other core infrastructure.
- Establishing the framework for a compact urban form that supports a reduction in the city's carbon emissions and a more efficient transport system
- Ensuring mana whenua are involved throughout the process to ensure their values and aspirations are appropriately acknowledged in the District Plan, and that they are supported in realising those aspirations through the implementation of the District Plan.

The Council's Infrastructure Strategy also forms part of the 2021-31 LTP and aims to support the objectives outlined above. The Strategy sets out how the Council intends to fund the necessary infrastructure upgrades required to support the range of initiatives outlined for the

next 10 years. The Strategy acknowledges the need to improve current levels of service as well as the need to invest in new infrastructure to service future growth.

The Strategy does not yet fully include the infrastructure needs to service all the growth that is expected for the City over the next 30 years due to the scale of these requirements, and the fact that the District Plan Review process is not yet complete. Further adjustments will be needed once the new District Plan is operative, and development starts occurring under the new planning framework. Not all development opportunities will be taken up at the same time, and some areas may intensify more quickly than others. Council will need to continue to monitor this and make adjustments to its infrastructure funding through subsequent Annual Plan and LTP processes over the coming decade.

7.4 Proposed District Plan Policy and Spatial Approach

This section of the report sets out at a high level the policy approach and spatial application of that approach in the PDP. This is not exhaustive and is provided as an overview of the approach. More detail is provided in the PDP chapters and their supporting Section 32 Evaluation reports.

The PDP provides sufficient development capacity for the City's housing and business needs

The PDP will significantly increase the amount of housing enabled throughout the City. *The Wellington City Commercially Feasible Housing Residential Capacity Assessment report (June 2022)* models the housing capacity enabled by the Draft District Plan and includes consideration of the Medium Density Residential Standards (MDRS). Since this modelling work was undertaken the WCC Planning and Environment Committee decision of 23 June 2022 resulted in removal of enabled capacity along the Johnsonville Railway Line from 6 storeys (21 metres) within 10 minutes walking catchments of the Johnsonville Line Stations (excluding Johnsonville Station). The resultant impact on housing capacity has not yet been modelled. This will be undertaken in late 2022.

Notwithstanding the above caveat, the 'officer recommended' PDP provisions would have enabled an additional 73,400 commercially realisable houses. This is more than double the estimated number of houses required (36,621) to meet population growth over the next 30 years. Of this number, around 20%, or 9,500 houses, were attributable to the MDRS which apply in the medium density residential zones, except where qualifying matters or higher densities apply.

The number and types of houses that are actually 'realisable' will be influenced by the make up of the population, land owner aspirations, economic conditions, and the costs of construction. These conditions will change over the life of the District Plan (10 years) and the Spatial Plan (30 years).

While the Council is required to comply with the NPS-UD and MDRS, the Proposed District Plan should be enabling of as much additional capacity as possible in areas identified in the Spatial Plan and PDP. The reasons for this are:

- Additional opportunities for market housing alongside other measures such as the Councils Te Kāinga programme, help to reduce housing unaffordability and high rents. This will provide opportunities for people from all walks of life to live and work in the City.

- Having a compact city encourages more walking, cycling and use of public transport. These measures are currently being implemented through Let's Get Wellington Moving (LGWM) and investment in a city-wide bike network ('Pāneke Pāneke').
- Together these policies and investments put the City in a much stronger position to meet climate change targets and becoming a low-carbon city, whilst tackling our housing affordability issues.
- Targeted high density growth and development leads to more efficient use of existing and planned three waters infrastructure, public transport, open space, and community, health, and educational facilities and services.

Urban intensification at a range of scales and locations

The spatial application of the Proposed District Plan has been premised on the principle of retaining a compact city, in line with the approach of the Spatial Plan. At a high level this involves intensification within the existing urban footprint, and limited greenfield growth.

The NPS-UD has been given effect to through the Proposed District Plan, with greater densities provided for along key transport routes and in and around key centres. This has been supplemented with a centres-based approach to providing for growth in other areas, that are not affected by the NPS-UD based on the key services and amenities in these locations. There is also greater scope for infill development as a result of the incorporation of the Medium Density Residential Standards (MDRS) as is now required by the Resource Management (Enabling Housing Supply and Other Matters) Act 2021.

As a result of this approach, the key areas of change include:

- More intensive development is provided for within the City Centre, particularly within Te Aro where the maximum building height has been increased from 27 metres/ 6 storeys to 42 metres/12 storeys.
- Development of at least 6 storeys is enabled within:
 - A 10-minute walking distance of the city centre – this covers most of the inner suburbs of Mt Victoria, parts of Oriental Bay, Thorndon, Aro Valley, Mt Cook, and the southern part of Newtown. The exception is where these areas include 'Character Precincts' which are a qualifying matter under the NPS-UD in recognition of streetscape character derived from a concentration of high contributing pre-1930 buildings.
 - A 10-minute walking distance of Johnsonville Centre, as this is zoned Metropolitan Centre.
 - A 10-minute walking distance of the Tawa and Kenpuru railway stations.
 - 5 mins walking catchment around the other stations designated as rapid transit along the Hutt/Melling Kapiti lines.
- Suburban centres and their surrounding residential areas that are served by frequent public transport, a range of community services, schools, and other day-to-day services that will support growth intensification. These areas include: Newtown (outside of the 10 minute walking catchment noted above), Berhampore, Island Bay, Miramar, Brooklyn, Newlands, Lyall Bay, and Kilbirnie. The urban form in these locations will be mixed use development in the centres, with building heights of 4 to 6

storeys provided for, complemented by medium density development of up to 4 storeys in the areas immediately surrounding the centre.

- Outside of centres and areas affected by the NPS-UD, the remainder of the residential area of Wellington City provides for much greater levels of infill in line with the MDRS – 3 dwellings of up to 3 storeys are provided for without the need for resource consent, subject to meeting all other MDRS.

The use of ‘qualifying matters’

The PDP includes a number of ‘qualifying matters’. Some qualifying matters are used to modify the building height and density requirements of Policy 3 of the NPS-UD, while others do not, but are expressly identified in the NPS-UD. A list of all qualifying matters in the PDP is provided below:

- Natural hazards
- Historic Heritage
- Sites and Areas of Significance to Māori
- Viewshafts
- Significant Natural Areas
- Outstanding Natural Features and Landscapes
- Natural Character
- Character Precincts and the Mt Victoria North Townscape Precinct
- Notable Trees
- Open Space
- Wellington Waterfront
- Designations
- Air noise overlay
- Notable trees

More detail about these qualifying matters and the values or risks they manage are outlined in the section 32 reports for these topics.

Identifying future growth opportunities in the City’s north

The PDP provides for future urban development in two areas in the north – Lincolnshire Farm and Upper Stebbings/Glenside West. These areas have been identified as future growth areas for the City since the 1970s. The Lincolnshire Farm area is already included in the Operative Plan via a structure plan. The Council undertook a master planning process for the Upper Stebbings/Glenside West area in time for its inclusion in the Proposed District Plan.

In line with the Council’s approach to maintaining a compact city and reducing carbon emissions, the Plan provisions for these greenfield areas place particular requirements on this future development. These requirements differ to traditional greenfield development and seek to make efficient use of these last remaining greenfield areas while protecting the natural environment. This includes:

- the provision of a range of housing types
- a move away from reliance on private vehicles, and providing walking, cycling and public transport options for future residents
- ensuring ecological areas and important streams are protected

- limiting the need for modifications to the landform in order to limit earthworks
- providing access to amenities such as parks and other social infrastructure.

The Lincolnshire Farm area is also expected to include a neighbourhood commercial centre and there is scope for light industrial activity to establish to provide for the day-to-day needs of the local community and employment opportunities.

In Upper Stebbings, the development yield, and thus expected population, will be lower and is unlikely to support a viable commercial centre. These services are, however, provided for in nearby Churton Park.

Maintaining a centres hierarchy supported by mixed use and industrial areas

The NPS-UD not only requires the council to provide sufficient capacity for housing development, but it also requires that sufficient capacity be provided for business development needs. Wellington City has sufficient commercial land and floor space to provide for future business needs, however it is important that this be retained and not compromised by the establishment of other uses, such as residential.

The PDP therefore retains the centres hierarchy approach of the ODP and complements this with other commercial areas outside of centres. The centres hierarchy is designed to ensure the primacy of the central city (City Centre Zone), and that activities in all other centres are of a scale and type that is commensurate to that centre and the catchment it serves. As such, the hierarchy in the PDP is as follows:

Type of centre	Role
City Centre	The primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily accessible and easy to get around and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs.
Metropolitan Centres	These centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre.
Local Centres	These centres service the surrounding residential catchment and neighbouring suburbs. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City's public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more housing with enablers of growth such as walkable access to public transport, and community facilities and services.
Neighbourhood Centres	These centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day needs. These centres are generally for small commercial clusters and community

	services. Neighbourhood Centres are accessible by public transport and active transport modes.
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In addition to the centres hierarchy, the PDP includes a Mixed Use Zone which applies in suburban Wellington employment areas such as Takapu in Tawa, Kaiwharawhara, and the Rongotai Business Park. The zone provides for a compatible mix of residential, commercial, light industrial, recreational and/or community activities.

A General Industrial zone also applies to areas such as Ngauranga, Grenada North, and parts of Miramar. This zone provides for a range of industrial activities, and activities that are compatible with industrial uses.

The Commercial Zone applies to an area of land on Curtis Street in Karori, which has previously been the 'Curtis Street Business Area' under the ODP. This zone provides for a mix of commercial and residential activities but does not provide for integrated retail uses as is the case in the centres and City Centre Zones. Industrial activities are also strongly discouraged in this zone. There is a focus in this zone on good design and addressing amenity effects particular to the Curtis Street area.

Overall, the centres hierarchy, combined with the mixed use, general industrial and commercial zones provides for a comprehensive range of business activity supported by compatible uses across the City.

Taking a risk-based approach to natural hazard management

Wellington's hazard-prone nature also influences the spatial approach of the PDP. As noted earlier in this report, the ODP does not account for climate change and sea level rise, and the hazard provisions are based on outdated modelling. The District Plan review has provided an opportunity to apply best practice approaches to managing natural hazard risks, and to completely update the modelling and maps that inform the policies and rules.

The PDP takes a risk-based approach to managing hazard risks. The City has been mapped according to a hierarchy of low, medium and high hazard risk areas supported by objectives, policies and rules that manage development within each of these areas. This approach applies across all hazard types and ensures that damage to property and buildings as well as risks to human safety are considered in the planning framework. This is balanced with the need for reasonable use of private property. The plan provisions are based on prioritising the people's safety, maintain key infrastructure to ensure the health and safety of communities, and maintaining the functionality of buildings after a natural hazard event and the ability for communities to recover.

This approach does not mean that entire suburbs are prevented from development. It does, however, mean that some parts of the City have not been 'upzoned' to the extent that might otherwise be expected. As noted above, the NPS-UD provides that natural hazard risks can be applied as a 'qualifying matter' by local authorities to depart from the intensification requirements. The PDP has applied this provision to the Kilbirnie centre and surrounding residential area. As a Metropolitan Centre zone, Kilbirnie is subject to Policy 3(b) of the NPS-UD, meaning that development of at least 6 storeys must be enabled within the centre, and within a walkable catchment of the centre. The Council has determined that the risks of developing these areas to this intensity as a result of natural hazards is inappropriate, and therefore a lower scale of development is provided for in the immediate surrounding residential areas of Kilbirnie.

Stronger protection for the City's natural environment

The PDP introduces new provisions to protect significant natural areas (SNAs), areas of natural character, outstanding natural features and landscapes (ONFs and ONLs), and Significant Amenity Landscapes (SALs). This builds on the approach of the ODP where a limited range of ecological areas are protected via the Conservation Area overlay and the visual amenity of the City's Ridgelines and Hilltops is protected. These provisions not only implement the statutory requirements of section 6 of the RMA and give effect to the RPS policies, but they also respond to the community's desire to retain and enhance these important features of Wellington City.

Significant Natural Areas

The PDP gives effect to the Council's statutory requirement under [section 6\(c\)](#) to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna by identifying 'significant natural areas'. The identification of these areas also gives effect to the Wellington Regional Policy Statement, specifically Policy 23 which sets out the criteria for identification.

At a spatial level, SNAs are identified on both public and private property in both the rural and urban environments. SNAs are considered a 'qualifying matter' in the NPS-UD, meaning that the intensification requirements of the NPS-UD do not apply in these areas. As such, the identification and protection of an SNA on any property means further development within these areas is limited. However, this approach enables the City's indigenous biodiversity to be protected for future generations to enjoy as well as providing benefits such as preventing erosion and sedimentation loss to streams, rivers, lakes and harbours which can impact water quality and habitats in those areas.

SNAs are identified across the City, with a large percentage within the rural area to the City's southwest, west, and north. These areas are shown on the planning maps as an overlay.

On 23 June the WCC Planning and Environment Committee decision to notify the Proposed District Plan involved a resolution to remove all SNAs from residentially zoned properties, and retain SNAs for all other zones. The residential zones impacted by this decision are the Medium Density, High Density and Large Lot Residential Zones.

Natural Character

Wellington is a coastal city with an extensive coastal environment. It also has a number of significant rivers/streams across the City. Under [section 6\(a\)](#) of the RMA, the Council must recognise and provide for the preservation of the natural character of the coastal environment, and the margins of rivers, and the protection of them from inappropriate subdivision, use and development.

The RPS and NZCPS (in relation to the coastal environment) also set out particular requirements that council must give effect to.

The PDP includes provisions to protect these areas, including:

- applying a riparian margin setback from the beds of all rivers to restrict activities within these areas and ensure development in close proximity to rivers is sympathetic to that environment and the natural character values are protected.
- The identification of the inland extent of the coastal environment on the district plan maps, via an overlay.

- The identification of the values of the coastal environment and associated rules to protect these values from inappropriate subdivision, use and development in Schedules within the plan.
- The application of riparian margin and a coastal margin set back within the landward extent of the coastal environment, where activities are restricted to ensure that these sensitive areas are managed in a way that protects the natural character, open space, public access and amenity values of the coastal environment.

Natural Features and Landscapes

The Council also has further obligations to protect outstanding natural features and landscapes from inappropriate subdivision, use and development ([section 6\(b\)](#) of the RMA). The RPS also requires the identification of these landscapes and features, and sets out criteria for their identification. The Council The ODP does not sufficiently meet these requirements.

In addition, Policy 27 of the RPS provides for the identification of Significant Amenity Landscapes (SALs). SALs are landscapes which are distinctive, widely recognised and highly valued by the community for their contribution to the amenity and quality of the environment of the district, city or region.

The PDP identifies:

- 8 Outstanding Natural Features and Landscapes (ONFLs)
- 7 Significant Amenity Landscapes (SALs); and
- 18 Ridgelines and Hilltops

These landscapes and features are located across the City, predominantly in areas that are less developed (e.g. the Rural Zone and the Town Belt). The PDP identifies these areas spatially via an Overlay on the planning maps.

On 23 June the WCC Planning and Environment Committee decision to notify the Proposed District Plan involved a resolution to identify all of the Outer Green Belt as an Amenity Landscape. The Special Amenity Landscape spatial overlay in the PDP has been amended as directed by the Committee.

A new zoning framework and spatial layers

A key change from the ODP is the application of the National Planning Standards in the PDP. The Council is required to implement the planning standards by April 2024.

Zoning framework

The planning standards provide a mandatory zoning framework and provide for the use of overlays, precincts and other spatial layers where particular provisions apply. The Council is not required to use zones that do not reasonably apply to the local area, but may only add new zones where the proposed land use activities or anticipated outcomes of the additional zone meet all of the following criteria:

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

The PDP aligns with the zoning framework of the planning standards. The Council has added 2 special purpose zones – the Quarry Zone and the Waterfront Zone – in line with the criteria listed above.

Other spatial Layers

The PDP also utilises a number of other spatial layers provided in Planning Standard 12, as follows:

- Overlays – to spatially identify distinctive values, risks or other factors which require management in a different manner from underlying zone provisions. Examples include historic heritage, sites and areas of significance to Māori, and natural hazard layers. Overlays are generally used in the PDP where such matters cross two or more zones.
- Precincts – where the provisions differ from the underlying zone rules but only relate to one zone. Examples in the PDP include Character Precincts, the Inner Harbour Port Precinct, and the Multi-User Ferry Precinct.
- Specific controls – where a rule or standard for a site or group of sites differs from those of the wider zone to manage a particular effect. For example, in the Waterfront Zone, specific rules apply to the Queens Wharf buildings in relation to building height and alterations. A further example is in the City Centre Zone where there are requirements for verandahs to be provided along certain streets. These are shown on the planning maps.
- Development Areas – to show areas of future urban development in Lincolnshire Farm and Upper Stebbings and Glenside West. A development area has also been used within the urban area for the future redevelopment of the Kilbirnie Bus Barns site.
- Designations – the PDP includes a number of designations that are spatially defined under s168 and 168A of the RMA.

8.0 Consultation

Throughout development of the PDP the Council undertook an extensive process of consultation and engagement. This process consisted of a series of formative interactions with iwi authorities, key groups/organisations along with interaction with the community more broadly. A summary of the process undertaken is outlined below.

8.1 Key Phases of Consultation and Engagement

Our City Tomorrow Engagement 2017

Following the Kaikoura earthquake in 2017, Council undertook engagement with community groups and stakeholders to start a discussion about the City's future, given some of the major challenges the City faced. The engagement was initially focussed on the central city and surrounding suburbs, and focused on how the City should respond to the following key challenges:

- Our population is moving, with the anticipated growth of up to 80,000 people over the next 30 years likely to have a dramatic effect on the way our city looks, feels and operates

- The sea and climate are moving resulting in increases to our vulnerability to the impacts of rising sea levels and severe weather events.
- The earth is moving, with recent events highlighting vulnerabilities in our city centre.

The conversations occurred through a series of workshops which highlighted that these challenges were not limited to the inner city, but were in fact city-wide issues. The discussions resulted in the identification of five City goals :

- Compact
- Inclusive and Connected
- Greener
- Resilient
- Vibrant and Prosperous

These five goals provided the basis for the Planning for Growth programme of work which was subsequently included as a priority project in the 2018-28 Long Term Plan. The Planning for Growth programme included a review of the existing Urban Growth Plan and development of a Spatial Plan, and a full review of the Operative District Plan.

Growth Scenarios Engagement 2019

As a first step in the Planning for Growth programme, and a pre-cursor to the development of the Spatial Plan, the Council developed four high-level scenarios for how future growth could be distributed across Wellington City over the next 30 years. The scenarios provided the basis for City-wide engagement on a preferred approach to accommodating future growth given the City goals that had been identified in 2017.

The four scenarios can be summarised as follows:

1. Inner City Focus – the majority of future growth would occur in the central city and surrounding inner suburbs. The key features of this scenario included:
 - The need to significantly increase permitted building heights in the Central City, (particularly in Te Aro), along Adelaide Road, and in Newtown and Berhampore.
 - The complete removal of pre-1930 character protection in the inner suburbs
2. Suburban Centre focus – in addition to growth in the central city, this scenario directed future growth to the City’s suburban centres and residential areas immediately adjacent to these centres. Key features of this scenario included:
 - New development would occur in areas that are less prone to sea-level rise and liquefaction
 - Providing greater housing choice with a mix of apartments and townhouses across the City in areas that are well served by key services and amenities
 - Removing pre-1930 character protection in some areas, but to a lesser degree than the first scenario.
3. New greenfield suburb – this scenario identified Ohariu Valley as an area for future greenfield growth, alongside some growth in the inner-city and some suburban centres and existing identified greenfield areas. Key features of this scenario included:
 - Providing a range of housing types to ensure housing choice and to accommodate up to 11, 500 people

- Significant investment in infrastructure including roading, three waters, and community services.
4. Greenfield extensions – the final scenario focussed on extensions into greenfield areas adjacent to the existing urban area, alongside moderate growth in the central city and suburban centres. Key features of this scenario included:
- Extending the existing identified greenfield area of Lincolnshire Farm into Horokiwi and Takapu Valley
 - Identifying a rural hillside in Owhiro Bay for future urban development.
 - Providing for a range of housing types within these areas
 - Significant investment in infrastructure and community services (though not to the extent required under scenario 3).

The scenarios were not intended to be solutions in and of themselves. Instead, the scenarios were a way of engaging with the community and key stakeholders on the key issues that needed to be considered in developing a preferred growth approach, including how the five city goals could be achieved while providing for growth.

A total of 1372 submissions were received from residents, community groups and organisations. In summary, this feedback provided a clear direction of retaining a compact city and directing growth into the existing urban area. There was limited support for identifying additional greenfield areas over and above Lincolnshire Farm and Upper Stebbings/Glenside West.

The Growth Scenarios engagement provided Council with a firm base from which to develop a draft Spatial Plan.

Our City Tomorrow: A Spatial Plan for Wellington City (Draft) 2020

Following the direction from the Growth Scenarios engagement, Council developed a draft spatial plan for city-wide consultation. The draft Spatial Plan brought together the feedback from the Our City Tomorrow and Growth Scenarios engagements and provided more detail on how the City could achieve the City goals and also address the City's key challenges. The draft Spatial Plan was an opportunity to test with the community an approach to providing for future growth that not only aligned with the City goals, but also the requirements of the National Policy Statement on Urban Development 2020. It signalled a significant shift in the City's planning settings, as follows:

- A move away from the 'growth spine' approach of previous growth plans, toward a City-wide approach with a focus on the City Centre and surrounding inner suburbs, key suburban centres and their immediate surrounds, and the City's commuter train lines. This approach is necessary to ensure sufficient development capacity is provided for housing over the next 30 years.
- A change to the scale of the built form, with significantly more height and density provided for in the general areas noted above
- A move to a more targeted approach to the protection of pre-1930s character in the City's inner suburbs. The draft Spatial Plan proposed a significant paring back of the blanket controls on demolition of pre-1930s buildings, to focus only on those areas

where streetscape character is largely intact. This would allow significantly more redevelopment of sites in areas that are close to the city centre.

- Limiting greenfield growth to two areas previously identified in earlier growth plans – Lincolnshire Farm and Upper Stebbings and Glenside West.

The draft Spatial Plan also signalled measures to ensure the City's natural environment is protected as the City grows. This includes the identification of significant natural areas, outstanding natural features and landscapes, and the retention of the City's open space network. Additionally, the draft Spatial Plan signalled how the risks associated with natural hazards would be managed, including the need to limit intensification in areas such as Kilbirnie due to level of risk in these areas.

The consultation resulted in 2,897 submissions, with feedback focussed on:

- the location of future intensification
- the impacts of intensification on amenity and character
- mana whenua interests and aspirations
- the need to invest in the City's infrastructure and services to support growth
- the need to ensure future housing is affordable
- the need to improve public transport and accessibility around the city
- support for the approach to natural hazards, climate change and sustainability.

This feedback was then used to make changes to the plan, including the following key changes:

- the addition of a sixth city goal – Partnership with mana whenua
- the expansion of the NPS-UD 'walkable catchments' as follows:
 - around the City Centre to 15 minutes (from 10 minutes)
 - Increasing walkable catchment around all train stations to 10 minutes (from a mix of 5 and 10 minutes)
- the inclusion of an approach to prioritise infrastructure investment across the life of the Spatial Plan, notably signalling that no further intensification be provided for in Karori until such time as the suburb's significant infrastructure issues have been addressed

The final Spatial Plan was adopted by the Council in June 2021.

Draft District Plan Consultation (November-December 2021)

In parallel with the development of the final Spatial Plan, the Council also commenced the review of the Operative District Plan. A draft District Plan was released in November 2021 for consultation. The DDP was non-statutory and provided the community and stakeholders with early insight into how the Council proposes to implement the Spatial Plan and give effect to its statutory requirements under the RMA. The DDP also provided significantly more detail on exactly how the high-level proposals of the Spatial Plan would be implemented, and what measures would be available to manage growth and development.

Key changes from the Operative Plan to the Draft District Plan included:

- A significant expansion in the areas where intensification is provided for in line with the NPS-UD and the Spatial Plan – the Operative Plan provides for intensification in two 'Medium Density Residential Areas' of Johnsonville and Kilbirnie, with limited infill development provided for elsewhere in the City.

- An increase in the maximum building height in Te Aro (City Centre) to enable more density and regeneration in this area.
- A 'minimum building height' requirement in the City Centre to ensure more efficient use of key development sites
- Options for how affordable housing could be provided for through the District Plan – the 'Assisted Housing' chapter set out 4 options ranging from voluntary to mandatory requirements for new development.
- The introduction of new rules to protect the natural environment including significant natural areas and outstanding natural features and landscapes.
- A new risk-based approach to managing natural hazard risks across the City to ensure the health and safety of the community while also providing for reasonable use and development of private property.

Importantly, the DDP did not incorporate the changes required as a result of the Resource Management (Enabling Housing Supply and Other Matters) Act 2021. At the time, the legislation had not yet passed. However, the consultation process included information about the proposal, in particular the introduction of Medium Density Residential Standards and what the implications of this could be for the District Plan.

Consultation occurred over 8 weeks and a total of 1,034 submissions were received over this period. In early 2022, submitters were also provided the opportunity to speak to elected members and other submitters about the key points of their submission through oral forums.

The key themes raised through the feedback include:

- General support for the overall strategic direction of the DDP
- Concerns about the impact of building heights and intensification generally on amenity and character
- Opposition to the protection of significant natural areas on private land
- General support for the District Plan including requirements for new development to include affordable housing (assisted housing).
- General support for the focus on public transport and alternative transport modes, and a reduced emphasis on private vehicles
- Support for the recognition and acknowledgement of mana whenua values and the role of mana whenua in the District Plan
- General support for the approach to managing natural hazard risks.

Significant Natural Areas Engagement and Consultation - Backyard Tāonga

The Backyard Tāonga project was a targeted engagement programme with landowners directly affected by proposed SNAs. This engagement commenced in August 2019 and carried through to the end of 2021. More information can be found [here](#).

Landowners were made aware that an SNA had been identified on their property, details about the potential SNA, and what it could mean in terms of PDP rules. It included offers of

site visits with an ecologist to ‘ground truth’ the technical information provided in a report prepared by Wildlands.⁹

A summary of these consultations, including detailed summary of submissions for the above consultation stages can be found on the Wellington City Council website: wcc.govt/pdp.

Johnsonville Line - Rapid Transit Service

The National Policy Statement on Urban Development (NPS-UD) requires Wellington City’s Proposed District Plan (the Plan) to enable building heights of at least six storeys around Wellington City’s rapid transit stops.

NPS-UD definitions include:

- a rapid transit stop as “a place where people can enter or exit a rapid transit service, whether existing or planned”.
- a rapid transit service as “any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic.” In this context ‘planned’ is “planned in a regional land transport plan prepared and approved under the Land Transport Management Act 2003”.

These definitions of rapid transit service and stops are descriptive and do not have specific metrics. It’s up to councils to identify their rapid transit stops.

To confirm the rapid transit services and stops in Wellington City, criteria referenced in national and regional guidance was used as well as approaches taken by other Wellington urban councils’ and Auckland Council’s criteria for rapid transit.

Rapid Transit stops used for the Spatial Plan and Draft District Plan		
Kapiti Line	Johnsonville Line	Hutt/Melling Line
<ul style="list-style-type: none"> • Wellington Station • Takapu Road Station • Redwood Station • Tawa Station • Linden Station • Kenepuru Station (the station is outside Wellington City, but its walkable catchment is within it) 	Crofton Downs Station Ngaio Station Awarua Street Station Simla Crescent Station Box Hill Station Khandallah Station Raroa Station Johnsonville Station	Ngauranga Station

Many submitters on the Draft District Plan opposed classifying the Johnsonville Line as a rapid transit service, with an alternative assessment presented by three residents associations located along the Johnsonville Line (Ngaio, Onslow and Johnsonville) that it should not be classified as rapid transit.

⁹ Audit of Potentially Significant Natural Areas in Wellington City: Stage 1 Desktop Analysis (2016) - https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0014/3182/3942-Wellington-City-SNA-Draft-20161222.pdf

The table below summarises the differences between the two assessments. The points of agreement, for example that the Johnsonville Line is a public transport service and has a permanent route largely separated from other traffic, are not included below.

After the table is Greater Wellington Regional Council's perspective on the Johnsonville Line as rapid transit.

Component	Council staff assessment	Julie Ward, Lawrence Collingbourne and Tony Randle assessment
Wellington Regional Land Transport Plan 2021 (RLTP)	The RLTP's identification of Johnsonville Line as rapid transit should be given considerable weight, because the NPS-UD uses the RLTP to identify <i>planned</i> rapid transit.	The RLTP did not use specific criteria to classify the rapid transit. The RLTP relies on the ONF which uses a different definition. There are no plans to increase service speed, frequency, reliability or capacity of the Johnsonville Line service.
Ministry for the Environment (MfE) guidance	MfE giving Wellington's commuter rail services as an example of rapid transit should be given regard when interpreting the intent of the NPS-UD.	MfE has told WCC that determining rapid transit under NPS-UD is a decision for Greater Wellington Regional Council and WCC.
One Network Framework (ONF)	The ONF describes Public Transport Class 1 (PT1) as corridors where 'rapid transit' services operate. Its metrics for PT1 are useful and help clarify the NPS-UD definition.	The ONF PT1 definition is different to the NPS-UD definition of rapid transit. PT1 includes services that are not all rapid transit under the NPS-UD, like a slow, infrequent, unreliable, low capacity rail service.
NPS-UD "frequent"	Staff used the ONF PT1 category that all metro rail corridors are "frequent", but noting that the most feasible way to increase Johnsonville Line peak frequency from 15 to 10 minutes (a second track at Simla Crescent Station) would have a significant drop in reliability and resilience.	Johnsonville Line is every 30 minutes, 15 in morning and evening rush, 1 hour at night, and less in weekends. The Line cannot operate every 10 minutes like LGWM MRT. Auckland criteria is for at least every 15 minutes between 7 am and 7 pm, 7 days a week. A true "turn up and go" is at least every 10 minutes.
NPS-UD "quick"	<p>For this evaluation, "quick" is:</p> <ul style="list-style-type: none"> • the same speed or faster than the Google-estimated upper range of car travel time (with traffic) • from Wellington Station to the first and last public transit stops on the service within Wellington City (or most convenient adjacent road) • Around 5 pm on Wednesday 27 April <p>The Johnsonville Line is "quick" up to the last three stations: Khandallah, Raroa and Johnsonville.</p>	Not quick for all stops and all destinations. Crofton Downs, Ngaio, Awarua Street stations meet criteria if commuting to a destination 10 minutes walk of Wellington Station. Simla Crescent – bus is an equivalent service. Box Hill, Khandallah, Raroa and Johnsonville – the bus or driving (off peak) is superior. All other times and most other destinations – Johnsonville Line is inferior.
NPS-UD "reliable"	This evaluation uses Metlink's records of "reliable" as the % of scheduled train services that	Johnsonville Line only runs every fifteen minutes, so need to time your arrival. High instances of

	depart from origin no earlier than 30 seconds, meet the consistent service size, and stop at all the stations they are scheduled for. The Johnsonville Line has lost reliability for maintenance and upgrades, slips and tree fall, and the 2022 Parliament protests. The resilience and service upgrades for the Johnsonville Line underway now is expected to restore its reliability.	maintenance outages give a poor perception of reliability.
NPS-UD “high capacity”	Staff used the ONF PT1 category that the indicative bi-directional people movement is >3,000 people per day. The Johnsonville Line can carry up to 492 people per trip, every 15 to 30 minutes during the day and evening.	The Johnsonville Line peak capacity of just 2,000 passengers per hour does not meet Auckland’s heavy rail rapid transit baseline, and is barely better than a bus in general traffic.
LGWM’s “convenient”	This criterion was not used.	The Johnsonville Line is only convenient from Crofton Downs, Ngaio and Awarua St stations to a nearby CBD destination at peak time. For other stations, the bus is better. At all other times, the Line is inferior.
LGWM’s “comfortable”	This criterion was not used.	Not all stops. Open waiting areas, some stations have ramps or stairs, and at some distance from other services like shops.
LGWM’s “safe”	This criterion was not used.	Not all stops. Routes from some stops are via deserted unlit paths or underpasses.
LGWM’s “low carbon”	This criterion was not used.	Some electricity used by trains is from non-renewable sources. Sometimes patronage is very low, so per-passenger carbon footprint may be higher than electric cars. High density residential development zones around Johnsonville Line stations will increase carbon emissions, due to most taking private vehicles and some buses.
Comparison with Let’s Get Wellington Moving (LGWM)’s Mass Rapid Transit (MRT)	This does not form part of the staff assessment. LGWM’s description of the standards they want that new MRT service to achieve is not intended to be criteria for all rapid transit in Wellington.	The Johnsonville Line can be assessed against LGWM criteria for MRT: frequent (at least every 10 minutes), convenient (the most direct route, quickly), reliable (on time, comfortable, quiet and smooth), safe and low-carbon.
Comparison with Auckland City	Auckland’s rapid transit criteria are similar to the WCC staff assessment. The Johnsonville Line meets Auckland’s criteria, except that: <ul style="list-style-type: none"> • The Johnsonville, Raroa and Khandallah Stations are not 	The Johnsonville Line can be assessed against Auckland criteria: fast, frequent, reliable, high capacity, dedicated corridor, and shaping urban development.

	<p>time-competitive with cars in peak time</p> <ul style="list-style-type: none"> • the Line does not run at 15 minute frequencies most of the day, although this could easily change if patronage increases. 	
Comparison with Wellington Cable Car	The cable car meets the rapid transit criteria, ironic given its slow 18 km/h speed. But it is not identified in the RLTP or other national or regional guidance.	The cable car is excluded as a rapid transit service despite meeting ONF PT1 definition and having, in most respects, better performance than Johnsonville Line. No information supports the exclusion in the RLTP.

9.0 Appendices

Perspective from Greater Wellington Regional Council Transport Manager

I advise that we have no plans to change the designation of the Johnsonville Rail Line as a rapid transit service under the provisions of the NPS-UD.

Our understanding of the process is that a Regional Council designates the rapid transit services, which enables the territorial authority to upzone the surrounding catchment areas. This zoning is not necessarily required, nor is every stop on a rapid transit service necessarily a rapid transit stop for the purposes of the NPS-UD. It is highly unlikely for example that Paekākāriki on the Kāpiti Line would be designated a rapid transit stop as the narrow coastal topography and unsuitable geology would prevent any significant intensification.

When considering the Johnsonville Line as part of the region's transport network, it is almost uniquely placed to play a future significant role. It is a sole use public transport corridor and one that is not being used to its full potential. Challenges on the proposed southern MRT route around stopping parts of already congested corridors, segregating pedestrian traffic and securing scarce land for depoting do not exist as the Johnsonville line already has these attributes.

The submission [from Julie Ward, Lawrence Collingbourne and Tony Randle] we discussed last week treated the Johnsonville line as an isolated part of the overall network rather than a link with potential for significant integration as a core part of the region's passenger network.

This potential can be seen in the current Regional Land Transport Plan and Regional Public Transport Plan where the region's rapid transit network is defined as the four heavy rail lines converging on Wellington Railway Station from the north and continuing in the form of the future MRT to the south and potentially East. This network along with the high frequency bus routes form the core of Metlink's network. Integration of the Johnsonville line into the broader network is effectively underway with the roll out of Snapper across the rail network and the new fares structure which will permit seamless travel between modes. Development of the MRT will see increased ease of transfer between the heavy rail segments of the network, the high frequency bus network and the MRT irrespective of mode chosen for the latter.

Future reduction targets for Vehicle Kilometres Travelled and transport will require greater use of public transport and active modes. Given the challenging topography of the northern suburbs, this will require a high level of public transport uptake, potentially a combination of traditional bus, heavy rail and transport on demand.

From a Greater Wellington perspective, we expect to see this potential for the Johnsonville Line developed as part of the wider Wellington Transport Network under the Emissions Reduction Plan and further planning to achieve the long-term outcomes of the Regional Land Transport Plan.



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20 June 2022

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Tēnā koe Liam

Classification of the Johnsonville Rail Line as a rapid transit service

We have been requested to provide comment on the classification of the Johnsonville Rail Line as a rapid transit service as part of the Regional Land Transport Plan 2021.

In classifying the Johnsonville Rail Line as a rapid transit service, the Regional Transport Committee referenced the definition of rapid transit contained in the NPS-UD and considered the definitions for PT1 classification contained in Waka Kotahi's One Network Framework that includes all metro rail corridors and the Regional Public Transport Plan.

Regional councils identify and enable rapid transit services within each region, which in turn enables territorial authorities to 'up-zone' surrounding walkable catchment areas under NPS-UD Policy 3c. It is important to note that the identification of a rapid transit service in the Regional Land Transport Plan enables changes to district plan zoning to occur but does not require them.

The Johnsonville Rail Line is a key part of the region's transport network, and well placed to increase its future role. This rail line is a dedicated public transport corridor. As a dedicated corridor it does not have the challenges of segregation with other users required on other mixed-mode corridors. It is a key component of the regional transport network and is integrated into this network.

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There are planned improvements to the infrastructure and services on the Johnsonville Rail Line, as outlined in the Regional Land Transport Plan and Regional Public Transport Plan. The region's rapid transit network is defined as the four heavy rail lines converging on Wellington Railway Station from the north and future MRT to the south of Wellington. This network, along with the high frequency bus routes forms the core of Metlink's public transport network. The Johnsonville Line continues to be improved and better integrated into the broader network, most recently with the rollout of Snapper across the rail network and shortly with the introduction of a new fares structure. Development of MRT through Wellington will see increased transfers between the heavy rail segments of the network and MRT, allowing seamless trips to key destinations such as the Regional Hospital. In the next few years we anticipate the introduction of the new national ticketing system, providing for integrated ticketing across the public transport network.

The Government's recently released Emissions Reduction Plan sets ambitious targets for mode shift and carbon emission reductions in cities like Wellington. Achieving future Vehicle Kilometres Travelled reduction targets will require greater use of both public transport and active transport modes. The Johnsonville Rail Line will play a key part in mode shift for journeys from the north of Wellington to and from the central city and other key destinations.

We advise we have no plans to alter the current classification of the Johnsonville Rail Line as a rapid transit service within the Regional Land Transport Plan.

Ngā mihi

Summary

On 23 June 2022, the WCC Planning and Environment Committee in making its decision to notify the Proposed District Plan agreed:

.. that Johnsonville Railway Line will not be included as a rapid transit line and that any stops on the line will not be identified as rapid transit stops in respect of the National Policy Statement on Urban Development, with the effect that the walking catchment areas and additional height enabled around the rail stations will no longer apply, and instead building heights and densities of urban form commensurate with the level of commercial activity and community services under Policy 3d of the NPS-UD will apply."

These changes have been incorporated into the notified PDP.