

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.



By email

20 June 2022

100 Cuba Street
Te Aro, Wellington 6011
PO Box 11646
Manners Street
Wellington 6142
T 04 384 5708
F 04 385 6960

Liam Hodgetts
Chief Planning Officer
Wellington City Council
113 The Terrace
Wellington Central 6040

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.

Wellington office
PO Box 11646
Manners St, Wellington 6142

Upper Hutt
PO Box 40847
1056 Fergusson Drive

Masterton office
PO Box 41
Masterton 5840

0800 496 734
www.gw.govt.nz
info@gw.govt.nz



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.

	services. Neighbourhood Centres are accessible by public transport and active transport modes.
--	--

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

12.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposals having regard to their effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

Both proposals for the proposed Character Precincts and the Mt Victoria North Townscape Precinct meet the qualifying matters tests for the purposes of the MDRS provisions and Policy 3 of the NPD-UD.

Both proposals also largely adopt the provisions of the MDRS to achieve consistency with the Medium Density Residential Zone and to maximise development capacity within the restrictions imposed by these precincts. This has resulted in the existing pre-1930 character areas being reduced in their current extent by 71.%.

In conclusion, the evaluation demonstrates that the preferred proposals are the most appropriate RMA options for these two precincts.

- (a) To demonstrate why –
 - (i) it considers that any area proposed is subject to a qualifying matter; and
 - (ii) the qualifying matter is incompatible with the level of development provided for in the other intensification policies; and
- (b) Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- (c) Assess the costs and broader impacts of imposing those limits.

Application of 77K and 77Q

Under section 77K and 77Q of the RMA, the Council may undertake a descriptive approach to the justification of qualifying matters where those qualifying matters are included in the operative district plan 'an existing qualifying matter'.

The Council's operative district plan contains heritage buildings, heritage structures, heritage areas, notable trees and sites and areas of significance to Māori and are subject to section 77Q. Scheduled archaeological sites included in the proposed district plan are in the General Rural and Open Space zones and not subject to the NPS-UD.

The following commentary is required by section 77K and 77Q:

(a) identify by location (for example, by mapping) where an existing qualifying matter applies:

- Within the spatial extent of the area covered by this topic areas of the city have listed qualifying matters under the NPS-UD, have qualifying matters that require amendments to the building height or density requirements, and/or application of the MDRS.
- The following areas have been identified as subject to these qualifying matters and are subject to policy 3 of the NPS-UD or the MDRS:
 - Medium Density Residential zone
 - High Density Residential zone
 - Neighbourhood Centre zone
 - Local Centre zone
 - Mixed use zone
 - General industrial zone
 - Metropolitan centre zone
 - City Centre Zone

All qualifying matters are identified on the planning maps.

(b) specify the alternative density standards proposed for those areas identified under paragraph (a):

- Maximum building heights within heritage areas are identified in Standard HH-S4.
- Alternative density standards are not proposed on sites with a heritage building or structure, rather effects on heritage values are considered in the resource consent process which means achieving maximum heights otherwise

required by the NPS-UD or MDRS may not be possible. This is also true of Sites and Areas of Significance to Māori.

- The notable tree provisions restrict development within the root protection area, which means that 3 residential units may not be a permitted activity on every residential site should the notable tree provisions be triggered. This is also true of Sites and Areas of Significance to Māori.

(c) identify in the report prepared under section 32 why the territorial authority considers that 1 or more existing qualifying matters apply to those areas identified under paragraph (a):

- Because they are listed in the NPS-UD as qualifying matters.

(d) describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3:

- On a residentially zoned site within a heritage area, on a site with a heritage building or structure, or Sites and Areas of Significance to Māori any new building requires resource consent. This means 3 units are not permitted.
- In centres zoned heritage areas, the effect of the heritage area provisions is to limit 3 storeys of development capacity that otherwise would be provided for in absence of the qualifying matter.
- On sites with a heritage building or structure, heritage values are considered in the resource consent process which means achieving maximum heights otherwise required by the NPS-UD or MDRS may not be possible. This is also true of Sites and Areas of Significance to Māori.

NOTE: At date of publication the Council is awaiting a detailed assessment that meets and goes beyond the requirements of 77K and 77Q of the RMA to demonstrate the net effect of each qualifying matter on the provision of development capacity, including those new scheduled items that are not currently scheduled in the operative district plan.

This report will be published approximately August 2022 and made publicly available to support this section 32 report.

6.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts, and carried out extensive consultation prior to notification of the PDP.

This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Brief synopsis
<p><i>Inner and Outer Residential Areas - Background and Monitoring Report (November 2019), prepared by WCC</i></p>	<p>This report presents the findings of a review of resource consent data in relation to the Inner and Outer Residential Areas of the District Plan for the period 2009 – 2018. The report identified the following:</p> <ul style="list-style-type: none"> • The majority of consents analysed were for the Outer Residential Area – around 80%. • The majority of consents (63%) were for discretionary activities. • The majority of consents were non-notified (93%). • Applications are spread relatively evenly around the city. • 37% of the consents were for residential additions and alterations. • 27% were for new residential dwellings. • The most common rule triggered was for building recession plane breaches with over 40% of applications breaching these rules. • Site coverage (27% of applications), followed by earthworks (20% of applications) were the next most triggered rules.
<p><i>Outer Residential Area Infill Development – A Review of the Effectiveness of Current District Plan Provisions (February 2020), prepared for WCC by Urban Perspectives</i></p>	<p>This report examines the operative District Plan standards related to infill housing in the Outer Residential Area of the District Plan, and assessed their effectiveness in facilitating good infill housing outcomes.</p> <p>Key findings of this report are summarised as follows:</p> <ul style="list-style-type: none"> • District Plan Change 56 has had a limiting impact on the amount of infill development occurring in the city. • The infill housing height limit was identified as a major constraint. • There is conflict within the operative District Plan provisions seeking increased housing and the maintenance of existing character and amenity.

	<ul style="list-style-type: none"> • On the basis that infill housing needs to continue to provide a source of residential development capacity, the report recommended reviewing the current provisions and signalling a greater expectation of change whilst still ensuring an acceptable level of amenity.
<i>Planning for Residential Amenity (July 2021), prepared for WCC by Boffa Miskell</i>	<p>This report assessed measures that can be used to achieve a balance between amenity and the increased density envisaged by the NPS-UD.</p> <p>It provided recommendations on a suite of controls and standards that could be incorporated into the new District Plan.</p>
<i>Review of Residential Coastal Edge (March 2022), prepared for WCC by Boffa Miskell</i>	<p>This report reviewed the work carried out to define the Residential Coastal Edge as part of Plan Change 72, and assessed whether the evidence and reasons for providing special protection for the Residential Coastal Edge remain valid and robust today. It also took into account the new overlays and provisions in the Draft District Plan.</p> <p>The report concluded that it was not necessary to carry over the current Residential Coastal Edge provisions into the new District Plan.</p>
<i>Proposed Amenity and Design Provisions – Cost Benefit Analysis (June 2022), prepared for WCC by The Property Group</i>	<p>This report provided a cost benefit analysis of the proposed amenity provisions in the Draft District Plan.</p> <p>The analysis found that in most cases where the amenity provisions have been applied the development remains profitable.</p> <p>The report recommended that the building depth and separation rules be reviewed to assess if the design outcomes sought could be achieved using a different tool.</p>

6.2.1 Analysis of operative District Plan provisions relevant to this topic

The Residential Areas of Wellington City are typically characterised by low-rise single dwelling houses on individual lots. Inner city areas are more intensive and densely populated.

There are three residential areas / zones identified in the operative District Plan:

- Inner Residential Area;
- Outer Residential Area; and
- Medium Density Residential Areas (MDRAs).

Previous plan changes 56 and 72 were focussed on the residential areas.

Plan change 56 introduced new controls to manage infill development. Key changes included a reduction in the bulk and scale of infill housing and a requirement for each dwelling to have an area of outdoor open space attached to it.

Plan change 72 involved a full review of the residential chapters. Key changes introduced through this plan change included two new Medium Density Residential Areas surrounding the Johnsonville and Kilbirnie town centres; and the inclusion of new provisions to recognise the unique character of Wellington’s ‘residential coastal edge’.

The Inner Residential Area includes a high concentration of buildings built at the turn of the last century. The operative plan manages the demolition of these pre-1930s buildings in order to maintain the character of these areas.

Also within the Inner Residential Area is the Oriental Bay Height Area, which provides for medium to high rise residential development in recognition of the close proximity of this area to the central city.

The Medium Density Residential Areas around Johnsonville and Kilbirnie provide for increases in residential density. Rather than seeking to maintain the existing character of these areas, the plan provisions allow for changes to the character and scale of buildings in these areas provided that new development is demonstrated to be of high quality.

The Outer Residential Area contains the suburbs from the Inner Town Belt to the boundary of the Rural Areas. Residential character varies across these suburbs. Houses in the Outer Residential Area are generally larger and located on larger sections compared to the Inner Residential Area.

A consistent policy approach in the operative plan for both the Inner and Outer Residential Areas is to provide for new housing development where it will maintain existing character and the amenity of adjacent properties.

Multi-unit residential development⁶ is subject to a restricted discretionary activity process across all of the residential areas. Design guidelines are also used to assess new multi-unit developments.

There are a number of appendices to the Residential Chapter of the operative plan that have been included over time through various plan changes. Many of these appendices are no longer considered necessary.

The different standards that apply to the residential areas in the operative plan are summarised in the table below.

Standard	Inner Residential	Outer Residential	MDRAs
Minimum Site Dimension	Nil	Nil	Sites must be able to accommodate a circle with a radius of 11 metres.

⁶ In the Inner Residential Area and Medium Density Residential Areas: multi-unit development is defined as two or more household units on a site; in the Outer Residential Area it is three or more household units on a site.

Standard	Inner Residential	Outer Residential	MDRAs
Front Yards	1 metre	3 metres, or 10 metres less half the width of the road, whichever is the lesser	3 metres
Side and Rear Yards	Nil	Nil	Nil
Ground Level Open Space	35m ² per unit (minimum dimension 3 metres)	50m ² per unit (minimum dimension 4 metres)	20m ² per unit (minimum dimension 3 metres)
Site Coverage	50%	40%	50%
Maximum Height	10 metres	8 metres	Kilbirnie – 10 metres Johnsonville – 8 metres
Maximum Height of an Infill Household Unit	Nil	4.5 metres or 6 metres depending on site slope	Nil
Building Recession Planes	2.5m x 45°, 56°, 63° or 71° dependent on boundary bearing	2.5m x 45°	2.5m x 56° or 63° dependent on boundary bearing

6.2.2 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of 'Partnership with mana whenua' in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

The Draft District Plan versions of the residential chapters were reviewed by mana whenua. No specific advice was received from this review.

6.2.3 Consultation undertaken to date

There have been four rounds of community engagement since 2017 leading to the PDP. These are summarised as follows:

- Our City Tomorrow 2017: the purpose of this engagement was to begin a discussion with the community about what their aspirations are for the City's future given population growth, seismic risks, climate change and sea level rise. From this engagement the following city goals emerged: compact, inclusive and connected, resilient, greener, and vibrant and prosperous. A total of 724 submissions were received through this engagement.
- Growth Scenarios 2019: this City-wide engagement sought the community's views on where and how the City could accommodate 50,000-80,000 more people over the next 30 years, given the city goals. Four scenarios were presented (Inner City, Suburban Centres, and two greenfield scenarios) which represented different forms of development with a range of costs and benefits. A total of 1372 submissions were received on this engagement. This engagement showed strong support for a compact city approach, with future growth concentrated in the City Centre, inner suburbs and in and around suburban centres. There was limited support for further unplanned greenfield development. The Strategy and Policy Committee approved this growth approach in June 2019.
- Draft Spatial Plan 2020: the draft spatial plan engagement was an opportunity for the community to see more detail about the preferred growth scenario and what this could mean for their suburb. The draft spatial plan included a number of key actions that would be needed to realise the preferred scenario, and achieving the city goals. A total of 2900 submissions were received. The Spatial Plan was adopted by Council in June 2021.

- Draft District Plan (DDP): this was consulted on in late 2021 with 1034 submissions received. This included consultation with our two Community Boards, Councils advisory groups (Accessibility, Environmental, and Youth), a significant number of meetings and webinars etc with residents associations, numerous community and advocacy groups. The DDP included all relevant objectives, policies and rules to enable a full assessment by the community of the likely provisions to be included in the PDP.

The following is a summary of the more specific consultation that has been undertaken in respect of the new residential zones in the PDP.

Who	What
Technical Review Panel	<p>A Technical Review Panel (TRP) was appointed by WCC for the purpose of testing and providing feedback on the Draft District Plan chapters. The TRP included a range of design, planning, heritage, architecture and economic experts.</p> <p>The new residential zone chapters were considered by the TRP in April 2021. Overall, the Panel considered that the chapters were clear and fit-for-purpose with some suggested refinements.</p>
Councillor Working Groups	<p>There have been regular workshops with Councillors throughout the course of preparing the Draft and Proposed District Plans. These workshops covered a wide range of topics and allowed Councillors to provide feedback on key policy directions and to input into the development of the Draft and Proposed District Plans.</p> <p>The new residential zones were specifically discussed at these workshops on a number of occasions.</p>
Feedback on Draft District Plan	<p>A detailed report on the submissions received on the Draft District Plan is available here: https://planningforgrowth.wellington.govt.nz/district-plan-review</p> <p>In relation to the residential zones, the above report provides the following overall summary on the feedback received on the residential zones⁷:</p> <p><i>“There were five times more submissions made on the Medium Density Residential Zone subsections than there were on the General Residential Zone subsections. Over a third of the submissions made on subsections within the Medium Density Residential Zone section were of the pro-forma type and urged that a small number of streets within Mt Victoria have their maximum heights reduced from 21m to 11m. Objections to new maximum heights of 21m were made across the subsections about Residential Zones, and were typically justified with commentary around shading, wind tunnelling, loss of character and amenity, and infrastructure pressure anticipated by the influx of new residents.”</i></p>

⁷ The Residential Zones included in the Draft District Plan were General Residential and Medium Density Residential. These have changed in the PDP to Medium Density Residential and High Density Residential.

	A summary of specific feedback on the residential zones received during consultation on the Draft District Plan is contained in Appendix 1 of this report.
--	--

6.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above, the following issues have been identified:

Issue	Comment	Response
Issue 1: The need to increase housing supply and choice.	<ul style="list-style-type: none"> There is clear evidence that the operative District Plan does not provide sufficient capacity to meet population increases. Changes are therefore needed. 	<ul style="list-style-type: none"> New Medium and High Density Residential Zones, with associated objective, policy and rule frameworks that provide for increased housing supply and different types of housing.
Issue 2: Need to Implement the requirements of the NPS-UD and the RMA (enabling Housing Supply and Other Matters) Amendment Act.	<ul style="list-style-type: none"> These higher order documents require the provision of sufficient housing development capacity to meet community needs. This includes enabling higher densities in identified locations. Wellington City Council as a Tier 1 authority must incorporate the MDRS and give effect to Policy 3 of the NPS-UD through an ISPP process that must be notified before 20 August 2022. The Operative District Plan does not give effect to these requirements. 	<ul style="list-style-type: none"> The new Medium and High Density Residential Zones include enabling standards to provide for intensification and increased housing opportunities in accordance with the requirements of the NPS-UD. The MDRS are incorporated into the new residential zones. As required by Policy 3 of the NPS-UD, the HRZ enables building heights of at least six storeys within a 10 minute walkable catchment of the City Centre Zone, Johnsonville Metropolitan Centre, and the Kenepuru and Tawa railway stations. Building heights of at least six storeys have not been applied around the Kilbirnie Metropolitan Centre due to natural hazards being a qualifying matter in this area.

HRZ Provisions	MRZ Provisions	Comments
<ul style="list-style-type: none"> • Maximum building height • Height in relation to boundary • Boundary setbacks • Building coverage • Outdoor living space • Outlook space • Windows to Street • Landscape Area • Permeable surface • Height and design of fences and walls <p>Additional standards for multi-unit housing relating to:</p> <ul style="list-style-type: none"> • Minimum unit size • Outdoor living space • Outlook space • Minimum privacy separation • Maximum building depth • Minimum building separation 	<ul style="list-style-type: none"> • Maximum building height • Height in relation to boundary • Boundary setbacks • Building coverage • Outdoor living space • Outlook space • Windows to Street • Landscape Area • Permeable surface • Height and design of fences and walls <p>Additional standards for multi-unit housing relating to:</p> <ul style="list-style-type: none"> • Minimum unit size • Outdoor living space • Outlook space 	<p>to three residential units, except in relation to front and side yards where there is no requirement.</p> <p>The decision to not include the MDRS front and side standards was made by the Wellington City Council Planning and Environment Committee on 23 June 2022.</p> <p>The RMA Amendment Act allows Council to depart from the MDRS where more enabling standards are proposed, which is the case with front and side yard setbacks not being required.</p> <p>A permeable surface standard has been included in addition to the MDRS for development of up to three residential units. Section 80E(2) of the RMA Amendment Act specially allows for additional provisions relating to stormwater management including permeability.</p> <p>For the HRZ, there are additional height and height in relation to boundary standards that allow for greater building heights under a restricted discretionary consenting process. These additional standards are consistent with the requirements of the NPS-UD to enable building heights of up to 6 storeys in specified areas.</p>

In addition to the above provisions there is also a supporting Residential Design Guide, but the content of this is not addressed in this report.

Oriental Bay Height Precinct (OBHP)

The Oriental Bay Height Precinct is located within the Medium Density Residential Zone. The proposed provisions are largely carried over from the operative District Plan and are summarized in the table below.

OBHP provisions	Comments
One objective stating the purpose of the OBHP.	The purpose of the OBHP is to accommodate medium to high density residential development and a range of compatible non-residential activities at ground floor that maintain or enhance the unique qualities of the Precinct.

<p>Overall evaluation of effectiveness and efficiency</p>	<p>The proposed approach is considered to be most appropriate for achieving the proposed objectives in relation to both effectiveness and efficiency for the following reasons:</p> <ul style="list-style-type: none"> • It provides a clear and integrated framework to achieve the outcomes sought for the new residential zones. • In particular, it increases opportunities for housing alongside provisions to achieve quality living environments and well-functioning urban environments. • It is based on sound evidence, and has been developed through an extensive consultation process. • It effectively implements all higher order direction. • The approach is efficient in terms of the level of certainty provided to landowners and plan users generally. • The costs are considered negligible compared to the high level of benefits. • The benefits of the proposed approach are considered to significantly outweigh the costs. 		
<p>Option 2: Alternative more permissive approach</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p>This option involves an alternative more permissive approach compared to Option 1, with the following changes:</p> <ul style="list-style-type: none"> • No limit on the number of permitted residential units on a site. • No requirement for a qualitative urban design assessment against the Residential Design Guide for multi-unit housing. • All breaches of standards would be assessed as restricted discretionary activities with the matters of discretion limited to dominance, privacy and shading effects on adjoining sites. • No consideration of streetscape or visual amenity effects, or on the level of on site amenity provided by new development. • For the HRZ, the standards would allow buildings and structures up to 21m as a permitted activity where all standards are met. 	<p>Environmental and social</p> <p>The alternative approach is very enabling in relation to providing for new housing development.</p> <p>However, it fails to address the community concerns relating to managing the scale and effects of change.</p> <p>It also fails to address the objectives for the residential zones that seek positive change and outcomes relating to healthy, safe and accessible living environments with attractive and safe streets.</p> <p>The reliance on bulk and location standards in this option, without any qualitative urban design controls, is considered to:</p> <ul style="list-style-type: none"> • Not effectively manage the transition to a more intensive high-density urban living environment. • Result in developments that have little regard to their context and surroundings. • Result on poor environmental outcomes. • Result on poor on-site amenity and greater amenity impacts to surrounding residential properties. • Not provide for the health and wellbeing of people in the new residential zones. <p>Economic and cultural</p> <p>No direct or indirect economic or cultural costs have been identified for this option.</p>	<p>Economic</p> <p>This approach would provide for more permissive development standards and therefore increased development rights.</p> <p>It is also likely to involve more permitted development and therefore less consenting and compliance costs.</p> <p>However, as set out in the 2022 cost benefit report by The Property Group, increased yield does not necessitate increased profit and feasibility. The report found that a high standard of development with good amenity would also support a higher price point achievable for each apartment.</p> <p>Environmental, social and cultural</p> <p>No direct or indirect environment, social or cultural benefits have been identified for this option.</p>	<p>There is insufficient information to support this approach.</p> <p>The use of design guides is well-established part of the operative District Plan, and the evidence base and consultation carried out does not support the need to move away from this approach.</p> <p>There is also a lack of testing and evidence that supports a conclusion that the alternative approach would achieve the outcomes sought for the new residential zones.</p>