

Property Council New Zealand

Submission on Proposed Wellington City District Plan

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For more information and further queries, please contact

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Proposed Wellington City District Plan

1. Recommendations Summary

- 1.1. Property Council New Zealand (“Property Council”) welcomes an opportunity to provide feedback on the proposed Wellington City District Plan (“proposed District Plan”). While we support the majority of the proposals, we recommend the following:
- Amend the walkable catchment in the City Centre zone to a 15-minute walk (i.e., 1200 metres);
 - Specify the starting point for the City Centre walkable catchment zone as it is currently unclear;
 - Increase the wind test requirements (i.e. to 22 metres) to allow for a buffer to the newly proposed minimum building heights and residential maximum heights;
 - Include the natural hazard overlays (i.e. flooding, fault rapture, tsunami and coastal) on the Council’s LIM reports;
 - Introduce incentives for large developments that can demonstrate a City Outcomes Contribution (such as priority consenting); and
 - Amend the proposed District Plan to incorporate a whole-of-system approach to the reduction of emissions by considering a place for private vehicles (such as EVs), freight and transport movement strategies and encouraging sustainable building designs.

2. Introduction

- 2.1 Property Council is the leading not-for-profit advocate for New Zealand’s most significant industry, property. Our organisational purpose is, “Together, shaping cities where communities thrive”.
- 2.2 The property sector shapes New Zealand’s social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.
- 2.3 Property Council is the collective voice of the property industry. Property is the fourth largest industry in Wellington. There are around \$40.4 billion in property assets across Wellington, with property providing a direct contribution to GDP of \$4 billion (10 percent) and employment for 20,640 Wellington residents.
- 2.4 We connect property professionals and represent the interests of 134 Wellington based member companies across the private, public and charitable sectors.
- 2.5 This document provides Property Council’s feedback on [Wellington City’s proposed District Plan](#). Comments and recommendations are provided on issues relevant to Property Council’s members.

3. Proposed approach to Housing Intensification.

- 3.1 Under the requirements of the National Policy Statement on Urban Development (“NPS-UD”), Wellington City Council (“the Council”) must significantly up zone large portions of Wellington. The Council is also required to enable developments of at least six storeys in walkable catchments around the City Centre, Metropolitan Centres and Rapid Transit Stations, unless there is a qualifying matter. The NPS-UD also requires additional intensification to occur around suburban centres. The RMA

Amendment Act requires the Council to adopt the new Medium Density Residential Standards (“MRDS”) across the rest of urban Wellington unless there is a qualifying matter.

- 3.2 Wellington City Council has proposed a walkable catchment of 800 metres (or 10 minutes) for the City Centre zone. This is very limited as it seeks to exclude Mount Victoria, Oriental Bay, Mount Cook and around Massey University Campus. We are concerned with the proposed 800 metre walkable catchment in Wellington, particularly given that Auckland, Hamilton and Christchurch city centres have a 1200 metres walkable catchment and Tauranga City have a 1500 metres walkable catchment. Limiting Wellington’s walkable catchment will encourage urban sprawl, limit future intensification and be an impediment for the Council in achieving their carbon neutral goals.
- 3.3 We recommend that the Council amend their walkable catchment to a 15-minute walk – 1200 metres. This will better help the Council reach its commitment to reduce net carbon emissions to net zero by 2050, as having more people live closer to the city centre reduces our carbon footprint.
- 3.4 The Council should be more specific with their mapping in order to establish a “starting point” for the City Centre walking zone. Current mapping is unclear as to where the starting point is established, unlike other council’s maps who clearly identify this. We recommend the Council specify the starting point for the walkable catchment zone within their District Plan.

4. General comment on Strategic Direction

- 4.1 We are concerned that none of the overarching principles discuss urban design. With intensification, it is important that good urban design is not only maintained but supported to thrive. Given the strategic objectives will be an important part of resource consents and plan changes, this will help indicate to the Council’s planners and Wellington City developers the importance of good urban design with urban form and development.

4 City Centre

- 4.1 With an expected 50,000-80,000 more people over the next 30 years, we support the proposed District Plan’s proposal to encourage more inner city living, greater density of urban form, and more efficient use of sites within the City Centre.
- 4.2 The proposed District Plan recommends retaining the current building height limits in most areas, while increasing heights in Te Aro and along a portion of Adelaide Road. Proposing minimum building heights that sit above the 20 metre City Centre wind test threshold could have adverse effects for development within the city. For example, a minimum building height of 21.5 metres in Te Aro would mean all future developments would have to undertake a wind test which costs around \$20,000 - \$25,000 and adds approximately six to nine months to a project. We raised this issue in our previous submission and although we are glad this was taken to wind experts by Council, we are disappointed with the recommendation to keep the threshold at 20 metres. Increasing the wind test level will likely encourage more large-scale developments in Wellington and would also simplify the Council’s and applicant’s overall development process.
- 4.3 The Council are looking to introduce minimum unit sizes. Minimum unit sizes, coupled with increased height density, run the risk of buildings that are smaller in floor space but greater in height. This could

have adverse design outcomes of small, skinny buildings with less total floor space. We recommend the Council consider the overall design outcomes to ensure no adverse effects occur.

5 Centres and business

- 5.1 The proposed District Plan proposes a requirement for any large or tall development to demonstrate a 'City Outcomes Contribution' which involves either; providing a public space, using materials that have less environmental impact or providing a public good outcome in other ways. In our previous submission, we recommended the Council introduce incentives for large developments that can demonstrate a City Outcomes Contribution (such as priority consenting). This would establish a quid pro quo system and enable growth rather than placing additional obstacles for large-scale development to occur. We recommend that this be implemented in the final District Plan.

6 Residential

- 6.1 As noted earlier in our submission, buildings over 20 metres require a wind test in Wellington. The proposed District Plan proposes medium density residential zone maximum height limits of 11m, 14m and 21m depending on the height area. These height limits have not changed since the previous draft District Plan. As noted earlier in our submission, buildings over 20 metres require a wind test in Wellington. In reality, a proposed maximum height of 21 meters will not be used, as under current rules an additional meter would trigger a wind test. We recommend slightly increasing the wind test threshold (i.e. to 22 metres) to best align with the proposed District Plan proposals.
- 6.2 The proposed District Plan also looks to set new standards for residential developments to ensure that new apartments and townhouses are pleasant places to live in. We are concerned that the Council's proposed approach of introducing residential standards could have unintended consequences if not worked closely with the sector.

7 Proposed approach to Character Precincts and Heritage as qualifying matters

- 7.1 Generally speaking, Property Council is supportive of character precincts and heritage as qualifying matters. The principle of protecting pre-1930s character housing within character precincts is important when properly balanced with unlocking additional development capacity for Wellington. Furthermore, retaining genuine heritage in Wellington is critical in maintaining a high quality, desirable and liveable building environment. Like with character precincts however, it is important that the Council ensures Wellington has sufficient development capacity when engaging with property owners on proposed new heritage listings.

8 Natural Environment and Natural Hazards and Resilience

- 8.1 We support assessing risk in a better more proactive way, as the proposed District Plan seeks to do. Supporting and assessing risks in a way that is more proactive will result in restrictions on building in high-risk areas, with work arounds for the lower-risk areas (taking into account the sensitivity of the proposed activity). Another approach the Council could take to proactively manage risks was to include the natural hazard overlays (i.e. flooding, fault rupture, tsunami and coastal) on the Council's LIM reports. We recommend Council investigate their inclusion.

9 Climate Change and Sustainability

- 9.1 For emission reductions to be successful, the sector requires clear national direction with a joined-up approach from Local Government. It is therefore alarming to read and hear discussions from the Council of the removing of private vehicle use, and car parks for private vehicle use within the city. For example, LGWM originally planned to remove up to 200 carparks along the Golden Mile. However, the Golden Mile design consultation earlier this year proposed up to 300 carparks being removed, with final numbers potentially changing. Removing private vehicle use directly contradicts to the Government's commitment towards EVs and we urge the Council to reconsider its proposals and look into supporting EV charging stations and car parks within the city.
- 9.2 The Government wishes to work with Auckland Council and Wellington City Council to establish congestion charging. Congestion charging is an important mechanism used internationally to fund the upkeep of connections and associated infrastructure. We support congestion charging and have been vocal with the Government on undertaking this initiative in Auckland and Wellington. Congestion charging could not only support the upkeep of connections and infrastructure, but also the development of EV charging stations around the city which aligns with the Government and the Council's policies to reduce total net emissions. We recommend the introduction of congestion charging and that it be ringfenced towards the upkeep of connections, infrastructure and EV charging stations around Wellington.
- 9.3 There are several central government work programmes and recent consultation documents that relate to climate change and sustainability including MBIE's Building for Climate Change programme. We support the Government's proposed investment in the sector to investigate ways to lower building emissions across the entire process (e.g. design, planning construction and deconstruction). A whole-of-system approach is required to make meaningful strides of change. We recommend the Council adopts a whole-of-system approach to the reduction of emissions within the District Plan, rather than solely focusing its efforts on the elimination of private vehicles. This whole-of-system approach would consider a space for private vehicles (moving towards EV), a freight and transport movement plan, and encourage sustainable designs within the building sector.

10 Conclusion

- 10.1 Property Council would like to thank the Council for an opportunity to provide feedback on the proposed Wellington City District Plan. While we are mainly supportive of the overall intent, we believe a few changes are required to encourage growth.
- 10.2 For any further queries contact Sandamali Gunawardena, Advocacy Advisor, via email: <mailto:sandamali@propertynz.co.nz> or cell 0210459871.

Yours sincerely,



Gerard Earl
Wellington Committee Chair
Property Council New Zealand