

18 September 2020

Tony Randle

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Dear Tony

Information Request: Proposed Spatial Plan

Thank you for your request made under the Local Government Official Information and Meetings Act 1987 (the Act), received on 19 August 2020. Wellington City Council (the Council) **granted** your request for information on 16 September 2020.

Our responses below are technical, to ensure we have clearly and accurately answered your questions, I have responded to each one separately. If there is anything you would like to discuss please feel free to contact the Planning and Growth team on planningforgrowth@wcc.govt.nz

- 1) The WCC criteria for determining the size of "a walkable catchment" as outlined under Policy 3(c) of the National Policy Statement on Urban Development 2020.
 - The National Policy Statement on Urban Development (NPS-UD) does not legally apply to the Spatial Plan as it is not a formal Resource Management Act document. It will apply to the new proposed District Plan when it is notified in late 2021. The NPS-UD intensification directions have been incorporated into the Draft Spatial Plan to obtain community feedback on a possible overall growth pattern, which will inform the detail of the District Plan. The intensification directions of the NPS-UD cannot be changed through submissions on the proposed plan when notified.
 - The NPS-UD does not define what a walkable catchment is for the purpose of implementing Policy 3(c).
 - Commonly five minute and ten minute walking catchments or 400m and 800m distances are used in transport planning and land use planning exercises, including those in other jurisdictions.
 - In the absence of any Government direction on the suitable size for a walkable catchment the Council has used a mixture of both a five minute and ten minute catchment as a starting point for discussion and community feedback.
 - The application of five and ten minute catchments is able to be submitted on.
 - The reasons for applying these catchments is answered in questions 13, 14 and 15.
 - These catchments were generated using a network analysis model. This model used a network of paths and tracks in Wellington City and an average walking speed of 5km/h. Where the slope/gradient of the path or trackway was not flat, the average walking speed was adjusted. Officers then adjusted the boundaries produced by the model to street boundaries where this would result in a more logical walking catchment boundary.
- 2) The WCC criteria for determining is a public transport stop is a "rapid transit stop" as outlined under Policy 3(c)(i) of the National Policy Statement on Urban Development 2020.
 - 'Rapid transit service' and 'rapid transit stop' are defined on page eight of the NPS-UD, copied below:
 - 'rapid transit service' means 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'.
 - 'rapid transit stop' means a place where people can enter or exit a rapid transit service, whether existing or planned'.

- The Council considers that the Johnsonville and Kāpiti rail lines and their stations meet the definitions set out above.
 - The Council considers that the potential rapid transit stops which could serve the mass rapid transit to be delivered through the Let's Get Wellington Moving Programme (LGWM) will meet the definition above.
 - The programme business case for the LGWM Mass Rapid Transit project suggests a route connecting the railway station with the Hospital, Newtown, Miramar and the Airport.
- 3) The WCC criteria for what areas are a "metropolitan centre zone" as outlined under Policy 3 (c)(iii) of the National Policy Statement on Urban Development 2020
- When the new proposed District Plan is notified it must implement the National Planning Standard (8) Zone Framework Standard.
 - The Zone Framework Standard contains a number of commercial and mixed use type zones equivalent to those included in the operative Wellington City District Plan. As the centres zones in the Wellington City District Plan are consistent with those in the Zone Framework Standard a direct translation is equivalent to a change of name (notwithstanding any up zoning that may be decided). This change is demonstrated in the table below.

Wellington City District Plan	Central Area	Sub-Regional Centres (Johnsonville and Kilbirnie)	Town Centres	District Centres	Neighbourhood Centres
Zone Framework Standard	City Centre Zone	Metropolitan centre zone	Town centre zone	Local centre zone	Neighbourhood centre zone

- 4) Each location in Wellington City that is "in city centre zones" as defined by Policy 3 (a) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3.
- This is the Central Area Zone of the operative District Plan.
 - The Council is still working through how the direction can be implemented to enable '*building heights and density of urban form to realise as much development capacity as possible*'. The Government will be releasing guidance on these matters in September 2020.
 - The Council's initial ideas on implementing this direction is publicly available in the Draft Spatial Plan. They include:
 - A minimum building height of six storeys.
 - A maximum building height of at least ten storeys in Te Aro.
 - Maximum building height of up to eight storeys (i.e. areas along the edge of the city in Thorndon, Aro Valley, and Mt Victoria).
 - No change to maximum building heights from those in the operative district plan elsewhere within the Central City, including within heritage areas.
 - These can be influenced by feedback on the Draft Spatial Plan.
- 5) Each location in Wellington City that is "in metropolitan centre zones" as defined by Policy 3(b) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3.
- As described in the Council's response to question 3 above, this is equivalent to the sub-regional centres of Johnsonville and Kilbirnie in the operative District Plan.
 - The Council's initial ideas on implementing this direction is publicly available in the Draft Spatial Plan. They include:
 - A maximum building height of eight storeys in Johnsonville and Kilbirnie.
 - This can be influenced by feedback on the Draft Spatial Plan.
- 6) Each location in Wellington City that is "within at least a walkable catchment of"... "existing and planned rapid transit stops" as defined by Policy 3 (c)(i) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3. The evidence used to support the extent of the walkable catchment for each location is also requested.

- The Council's interpretation of rapid transit stop is explained in the response to Question 2.
 - The Council's application of walking catchment is explained in the response to Question 1.
 - The locations that are within a five minute walkable catchment of planned and existing rapid transit stops are mapped and publicly available in the Draft Spatial Plan. See the Map builder 'NPS-UD affected area' along the Tawa, and Johnsonville rail line and along the indicative mass rapid transit route through Newtown.
 - The Council would like to obtain feedback from the community on these matters and test the application of the walking catchments modelled.
- 7) Each location in Wellington City that is "within at least a walkable catchment of"... "the edge of city centre zones" as defined by Policy 3 (c)(ii) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3. The evidence used to support the extent of the walkable catchment for each location is also requested.
- The City Centre zone is the National Planning Standards (8) Zone Framework Standard name for the 'Central Area zone' in the operative District Plan.
 - The Council's application of walking catchment is explained in the response to Question 1.
 - The locations that are within a ten minute walkable catchment of the edge of the city centre zone are mapped and publicly available in the Draft Spatial Plan. See the map builder 'NPS-UD affected area' which affects the inner suburbs of Aro Valley, Mount Victoria, Mount Cook and Thorndon.
 - As explained in the Draft Spatial Plan:
 - The NPS-UD requires our district plan to enable building heights of **at least six storeys** within a **walkable distance** of the city centre and metropolitan centres, as well as existing and planned rapid transit stops. The policy provides an exception to this requirement in order to consider 'qualifying matters', including **special characteristics** where there is sufficient evidence to show that providing for development to the required density would be inappropriate.
 - The Council considers that there is evidence to **support the continued protection** of pre-1930s character on a refined basis and that this meets the criteria of a 'qualifying matter' under the NPS-UD. Without this, building heights of at least six storeys would have to be enabled across the wider inner suburbs. Instead, building **heights of up to three storeys** are proposed in character sub-areas, and a range of four-six storeys is proposed outside of these sub-areas, within a general character area. Areas outside of the 'general character overlay' and within a walkable catchment from the central city would have building heights of at least six storeys enabled as required by the NPS-UD 2020. This will ensure housing and character are balanced and integrated, while still providing for change and growth within the inner suburbs.
 - The Council would like to obtain feedback from the community on these matters and test the application of the walking catchments modelled.
- 8) Each location in Wellington City that is "within at least a walkable catchment of"... "the edge of metropolitan centre zones" as defined by Policy 3 (c)(iii) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3. The evidence used to support the extent of the walkable catchment for each location is also requested.
- The Council's application of 'Metropolitan centre' is explained in response to Question 3.
 - The Council's application of walking catchment is explained in the response to Question 1.
 - Responses to Questions 13 and 15 are relevant.
 - The locations that are within a ten minute walkable catchment of the edge of the Johnsonville metropolitan centre zone are mapped and publicly available in the Draft Spatial Plan. See the map builder 'NPS-UD affected area' around the edge of the Johnsonville Metropolitan centre.
 - The Council would like to obtain feedback from the community on these matters and test the application of the walking catchments modelled.
- 9) Each location in Wellington City that is under "all other locations in the tier 1 urban environment" as defined by Policy 3 (d) of the National Policy Statement on Urban Development 2020 as well as the building heights and densities required by Policy 3.
- This is the balance of the Wellington urban area shown through housing typologies 1,2,3 and 4a and not already explained in response to these questions.
 - This information is mapped and publicly available in the Draft Spatial Plan. See the map builder.

- Also see the ‘Wellington Outer Suburbs Assessment and Evaluation’ which has informed the range of housing typologies applied. This is available online: <https://planningforgrowth.wellington.govt.nz/resources1/documents>
- 10) Each location in Wellington City that the WCC considers that it is necessary to modify the building height or densities in order to provide for a qualifying matter under Policy 4 of the National Policy Statement on Urban Development 2020 including, for each location:
- The qualifying matter including a copy of the evaluation report prepared under section 32 of the Act in relation to the proposed amendment
 - The alternative building heights and densities proposed.
- This question is answered by the Council’s response to Question 7. The Council also does not propose any changes to the present heights in central area heritage areas, which would meet the criteria as a qualifying matter under the NPS-UD.
 - A section 32 has not yet been prepared. It is not required for the Spatial Plan. Section 32 evaluation reports must and will be prepared when the proposed District Plan is notified.
- 11) The Housing demand assessment for each location in Wellington City including:
- The current number of each dwelling type.
 - The short term, medium term and long-term demand for additional housing including by dwelling type.
- This is the Wellington Regional Housing and Business Development Capacity Assessment. It is available here: <https://planningforgrowth.wellington.govt.nz/resources1/documents>
- 12) The housing development capacity for each location in Wellington City that is plan-enabled including:
- a) whether the location is plan-enabled; plan-enabled and infrastructure-ready; or plan-enabled and infrastructure-ready and reasonably expected to be realised
 - b) the development capacity quantified as numbers of dwellings of different types in the short, medium and long-term
 - c) that the WCC is satisfied there is adequate existing development infrastructure
 - d) if there is not adequate existing development infrastructure, identify what the infrastructure deficiencies are and confirm that the WCC is satisfied the additional infrastructure to service development capacity is likely to be available.
 - e) If this information is held in electronic form, then it is preferred that it is provided in its complete and original electronic format.
- Information regarding points 12 a, b and c is already publicly available in the Wellington Regional Housing and Business Development Capacity Assessment can be found here: <https://planningforgrowth.wellington.govt.nz/resources1/documents>
 - Two further reports were commissioned by the Council from Wellington Water Limited that estimated the three waters infrastructure costs. One was undertaken in 2019 and modelled possible costs of upgrading infrastructure to meet development capacity needs based on the ‘inner city focus’ and ‘suburban centres’ growth scenarios in the 2019 Planning for Growth consultation. This report was updated in 2020 to include Miramar and Hataitai which were identified as possible growth areas in the Outer Suburbs Evaluation report. Prior to finalising the Spatial Plan the Council intends to obtain updated estimates which will incorporate the NPS-UD direction implications.
 - The reports can be found here:
 - https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0016/13516/WCC-Spatial-Planning-Three-Waters-Project-Final-29-10-2019.pdf
 - https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0014/13505/Addendum-Report_WCC-Spatial-Plan-Outer-Suburbs-March20- Final.pdf
- 13) The criteria used to specify why Tawa railway station is to have ten minute walkable catchments while Linden Railway Station and the Johnsonville Line railway stations are to have five minute walkable catchments along with the evidence to support the application of this criteria.
- This is available online on the Planning for growth website.
 - The requirement to enable building heights of at least six storeys within at least a walkable catchment of rapid transit stops means a larger degree of intensification in the following areas:

Tawa, Redwood, Linden, Johnsonville, Khandallah, Ngaio and Crofton Downs. Further work is being undertaken around Kenepuru Station. The Draft Spatial Plan includes the following:

- At least six storeys buildings within a ten minute walking catchment of the Johnsonville railway station and the edge of the centre;
 - At least six storeys buildings within a ten minute walking catchment of the Tawa railway station; and
 - At least six storey buildings within a five minute walking catchment of all other railway stations.
- The Council used a ten minute walking catchment from the Johnsonville railway station and centre, and from the Tawa railway station because the wide range amenities such as public facilities, commercial and retail activities and services nearby have more potential to support growth and help facilitate a well-functioning urban environment. For other stations on the Johnsonville and Tawa railway lines, five minute walking catchments have been used reflecting the comparatively smaller range of amenities. The application of these walking catchment ranges is open to community feedback.
- 14) The specification for the walkable catchment for the Johnsonville metropolitan centre zone, the criteria used to specify this catchment area and the evidence used to support the application of this criteria.
- See the response to Question 13 above.
- 15) The specification for the walkable catchment for the Kilbirnie metropolitan centre zone, the criteria used to specify this catchment area and the evidence used to support the application of this criteria.
- Kilbirnie is presently identified as a Sub-Regional Centre in the operative District Plan. This equates to a metropolitan centre in the national planning standards and for the application of the NPS-UD.
 - The Council modelled a ten minute walkable catchment from the edge of the centre boundary using the same modelling applied to the Johnsonville Metropolitan centre.
 - As explained on the Planning for Growth website:
 - In Kilbirnie and Lyall Bay, there are a number of hazard issues relating to sea level rise, flooding, ground shaking, liquefaction and tsunami. The Council considers these hazards to be relevant 'qualifying matters' under the NPS-UD. This may mean enabling building heights of at least six storeys required by the NPS-UD (because it is a metropolitan centre) is not appropriate across these areas. The Council needs to do further work to fully understand the implications of these hazards on the level of risk for development in these areas beyond what is already proposed. This will inform future decisions about what level of intensification is appropriate.
 - The Draft Spatial Plan does not presently apply intensification direction Policy 3(c)(ii) of the NPS-UD to Kilbirnie for the reasons outlined above.
- 16) The criteria for specifying the walkable catchment for Medium density housing (type 3): 3-4 storey small apartment housing adjacent to suburban centres.
- The Type 3 housing typology was not based solely on a walkable catchment basis. It was based on a heat map of amenity 'enablers' and hazards. A full explanation of the methodology and criteria can be found in the Outer Suburbs Evaluation report available online: <https://planningforgrowth.wellington.govt.nz/resources1/documents>

Right of review

If you are not satisfied the Council's response to your requests and matters raised, you may choose to make a complaint with the Office of the Ombudsman. Further information is available on the Ombudsman website, www.ombudsman.parliament.nz.

Thank you again for your request. I trust this information is of assistance to you.

Kind regards



Asha Harry
Assurance Advisor