

2 December 2020

Tony Randle

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Kia Ora Tony

### **Follow up to IRO-10409 Spatial Plan**

Thank you for your request made under the Local Government Official Information and Meetings Act 1987 (the Act), received on 2 November 2020. The Wellington City Council (the Council) as **granted** your request for information at no cost. Each of your follow up questions has been responded to individually.

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.

4a) The WCC has not provided the building heights information for each location that is "in city centre zones" as requested.

4b) The WCC has not provided the building density information for each location that is "in city centre zones" as requested.

#### The Building heights of the City Centre zones:

- 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.
- All other areas in the city centre zone is a minimum building height of six storeys.
- These can be influenced by feedback on the Draft Spatial Plan.

The [Wellington Outer Suburbs Assessment & Evaluation](#) (pg 22) provides the heights in meters for the Storeys.

For density ranges of the Draft Spatial Plan typology proposals see:

[https://planningforgrowth.wellington.govt.nz/\\_data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/_data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

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.

5a) The WCC has not provided the building heights information for each location that is "in metropolitan centre zones" as requested.

5b) The WCC has not provided the building density information for each location that is "in metropolitan centre zones" as requested.

The Metropolitan Centre Zones is Johnsonville and Kilbirnie, the maximum height for these areas is eight storeys. The [Wellington Outer Suburbs Assessment & Evaluation](#) (pg 22) provides the heights in meters for the Stories.

For density ranges of the Draft Spatial Plan typology proposals see:

[https://planningforgrowth.wellington.govt.nz/data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

6) Each location in Wellington City that "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.

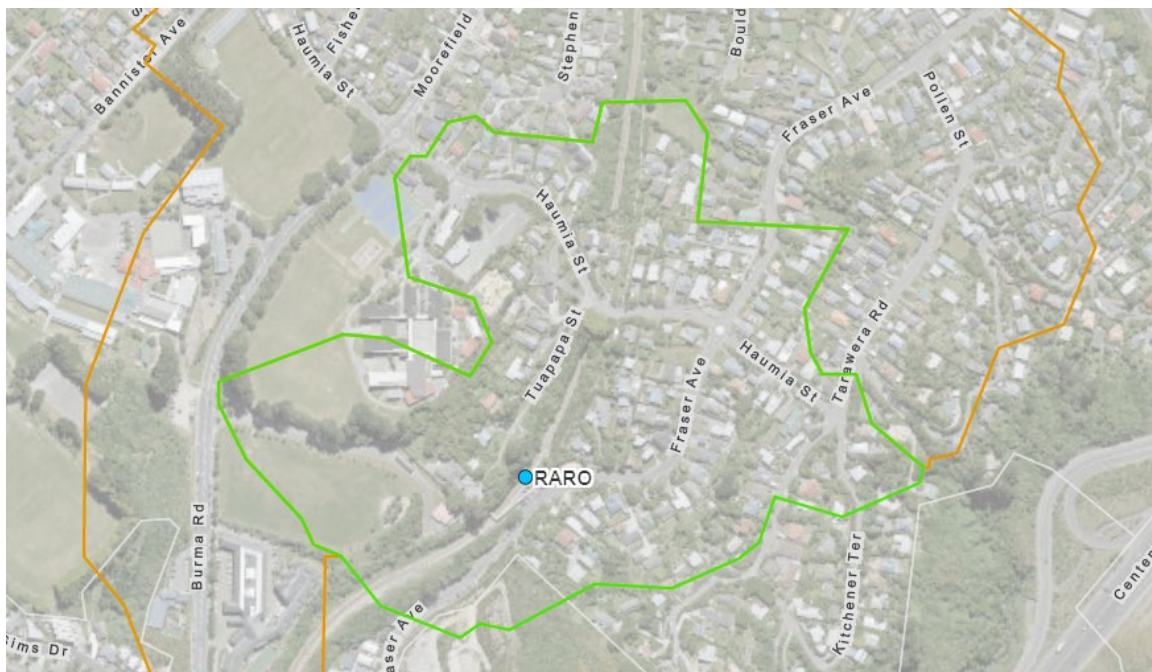
6a) The WCC has not provided the walkable catchment which is "within at least a walkable catchment of"..."existing and planned rapid transit stops" for Johnsonville Station and for Raroa Station as requested.

6b) The WCC has not provided the building heights information for each location that is "within at least a walkable catchment of"..."existing and planned rapid transit stops" as requested.

6c) The WCC has not provided the building density information for each location that is "within at least a walkable catchment of"..."existing and planned rapid transit stops" as requested.

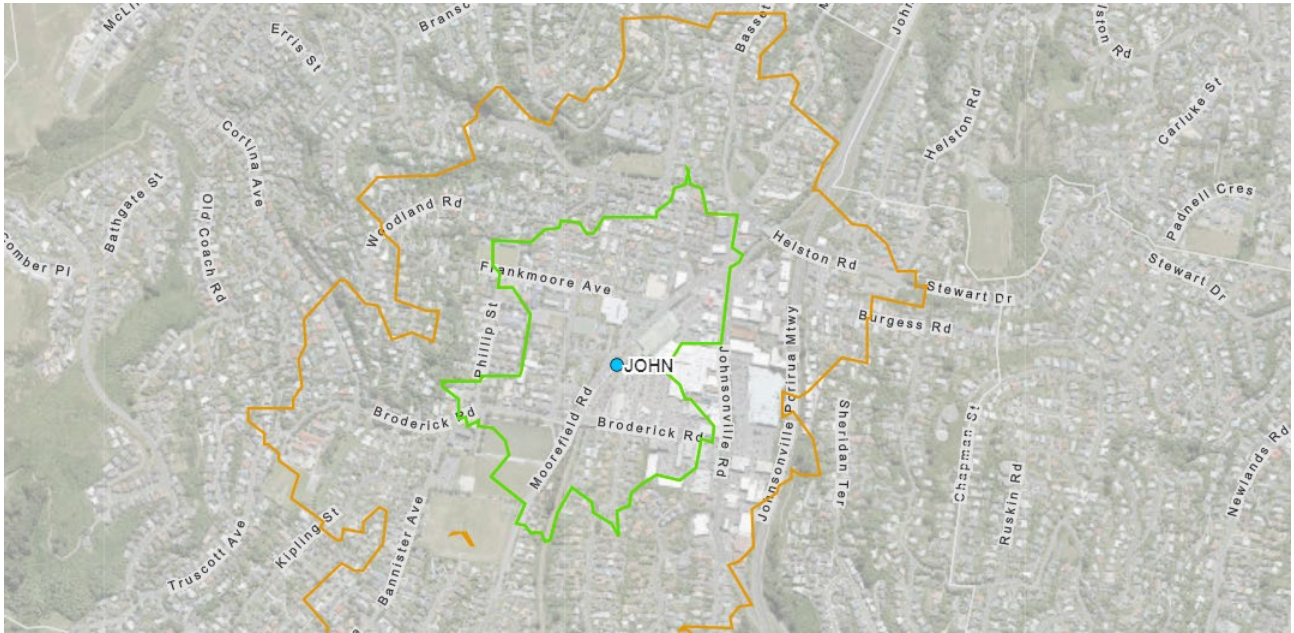
6d) The WCC has not provided the evidence used to support the extent of the walkable catchment for each location that is "within at least a walkable catchment of"..."existing and planned rapid transit stops" as requested.

Below is the screenshot of the 5 minute (Green), and 10 Minute (Orange) walkable area to Raroa Station:



The building heights in the walkable area of Raroa Station is a maximum building height of six storeys

Below is the screenshot of the 5 minute (Green), and 10 Minute (Orange) walkable area to Johnsonville Station:



The building heights in the walkable area of Johnsonville Station is a maximum building height of eight` storeys.

For density ranges of the Draft Spatial Plan typology proposals see:

[https://planningforgrowth.wellington.govt.nz/\\_\\_data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

7) Each location in Wellington City that "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.

7a) The WCC has not provided the building heights information for each location that is "within at least a walkable catchment of "the edge of city centre zones" as requested.

7b) The WCC has not provided the building density information for each location that is "within at least a walkable catchment of"..."the edge of city centre zones" as requested.

7c) The WCC has not provided the evidence used to support the extent of the walkable catchment for each location that is "within at least a walkable catchment of"..."the edge of city centre zones" as 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. 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 building heights for this area is **at least six storeys** within a **walkable distance** of the city centre and metropolitan centres, as well as existing and planned rapid transit stops. 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.

For density ranges of the Draft Spatial Plan typology proposals see:

[https://planningforgrowth.wellington.govt.nz/data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

8) Each location in Wellington City that "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.

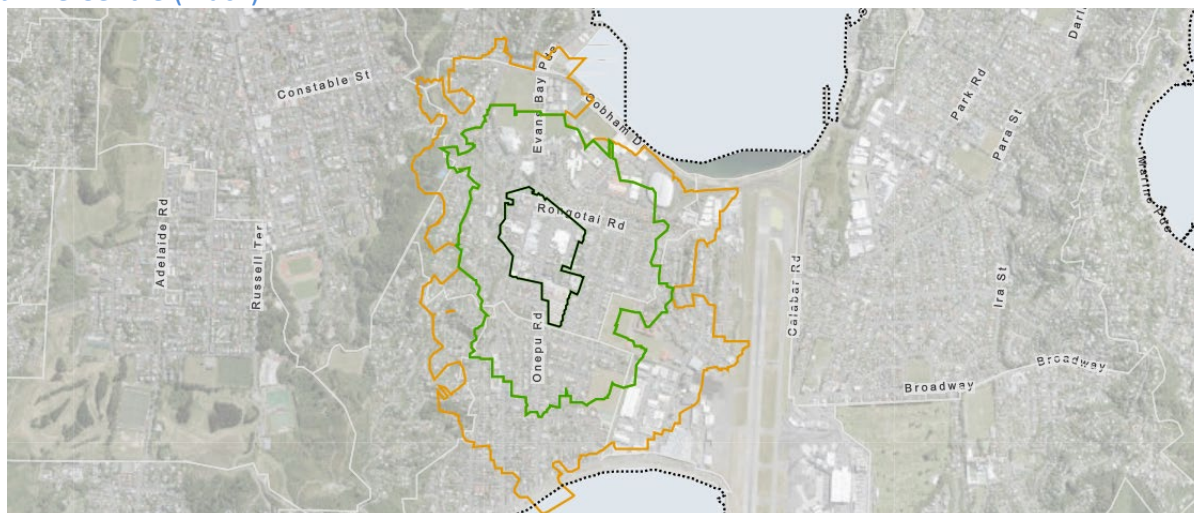
8a) The WCC has not provided the walkable catchment which is "within at least a walkable catchment of" "the edge of metropolitan centre zones" for Kilbirnie as requested.

8b) The WCC has not provided the building heights information for each location that is "within at least a walkable catchment of"..."the edge of metropolitan centre zones" as requested.

8c) The WCC has not provided the building density information for each location that is "within at least a walkable catchment of"..."the edge of metropolitan centre zones" as requested.

8d) The WCC has not provided the evidence used to support the extent of the walkable catchment for each location that is "within at least a walkable catchment of"..."the edge of metropolitan centre zones" as requested.

Below is the screenshot of the 5 minute (Green), and 10 Minute (Orange) walkable area for the Kilbirnie Centre (Black).



The building heights in the walkable area of Kilbirnie is between one to two storeys.

The Council cannot provide you with the density at this point in time as the information doesn't exist. The Council would like to obtain feedback from the community on these matters and test the application of the walking catchments modelled.

The Council has outlined in the Draft Spatial Plan that there are multiple hazard risks in Kilbirnie. Because of this the council has not incorporated the NPS-UD intensification requirements for a metropolitan centre at this time. As more research is obtained and work undertaken, the Council will need to revisit this proposal for the final spatial plan.

For density ranges of the Draft Spatial Plan typology proposals see:

[https://planningforgrowth.wellington.govt.nz/data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

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.

9a) The WCC has not provided the walking catchment or UPS-UD Impacted Area for each location that are locations as defined "all other locations in the tier 1 urban environment" as defined by Policy 3 (d) as requested.

9b) The WCC has not provided the building heights information for each location that are locations as defined "all other locations in the tier 1 urban environment" as defined by Policy 3 (d) as requested.

9c) The WCC has not provided the building density information for each location that are locations as defined under "all other locations in the tier 1 urban environment" as defined by Policy 3 (d) as requested.

- This is the balance of the Wellington urban area shown through housing typologies 1,2,3 and 4a

- This information is mapped and publicly available in the Draft Spatial Plan. See Appendix one: A screenshot from the map builder.

- Also see the 'Wellington Outer Suburbs Assessment and Evaluation' Pg 22 which has informed the range of housing typologies applied. This is available online.

- <https://planningforgrowth.wellington.govt.nz/resources1/documents>

- For density ranges of the Draft Spatial Plan typology proposals see:

- [https://planningforgrowth.wellington.govt.nz/\\_\\_data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

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.

10a) The WCC has not provided qualifying matter information for each location where a qualifying matter (as permitted under Policy 4) has been applied as defined by Policy 3 (d) as requested.

10b) The WCC has not provided the alternate building height information for each location where a qualifying matter (as permitted under Policy 4) has been applied as defined by Policy 3 (d) as requested.

10c) The WCC has not provided the alternate building density information for each location where a qualifying matter (as permitted under Policy 4) has been applied as defined by Policy 3 (d) as requested.

- This question is answered in part by the Council's response to Question 7.

- Other qualifying matters the council has used include heritage areas (eg Aro centre), natural hazards (eg Tinakori road).

- The Council does not propose any changes to the present heights in central area.

- 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.

- For density ranges of the Draft Spatial Plan typology proposals see:

- [https://planningforgrowth.wellington.govt.nz/\\_\\_data/assets/pdf\\_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf](https://planningforgrowth.wellington.govt.nz/__data/assets/pdf_file/0022/14953/PFG-Draft-Spatial-Plan-Growth-Figures-25-September.pdf)

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.

14a) The WCC have determined under the previous District Plan that the extent of the 10-minute walking catchment for Johnsonville as being the Johnsonville Medium Density Residential Area. The Spatial Plan has proposed a much larger extent to be walkable. The area proposed by the Spatial Plan as the walkable catchment for the Johnsonville metropolitan centre zone is different from both the MDRA and the walking catchment from Johnsonville Station. The area of this catchment area is yet to be provided.

14b) The criteria applied by the Spatial Plan to determine the walkable catchment for the Johnsonville metropolitan centre zone is different from both the MDRA and the walking catchment from Johnsonville Station. The criteria used to specify this catchment area and the evidence used to support application of this criteria are yet to be provided.

- 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.
- The Council received a number of submissions on the extent of walking catchments through submissions on the Draft Spatial Plan. Both smaller and larger walking catchments were requested. These will be considered when finalising the spatial plan.

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.

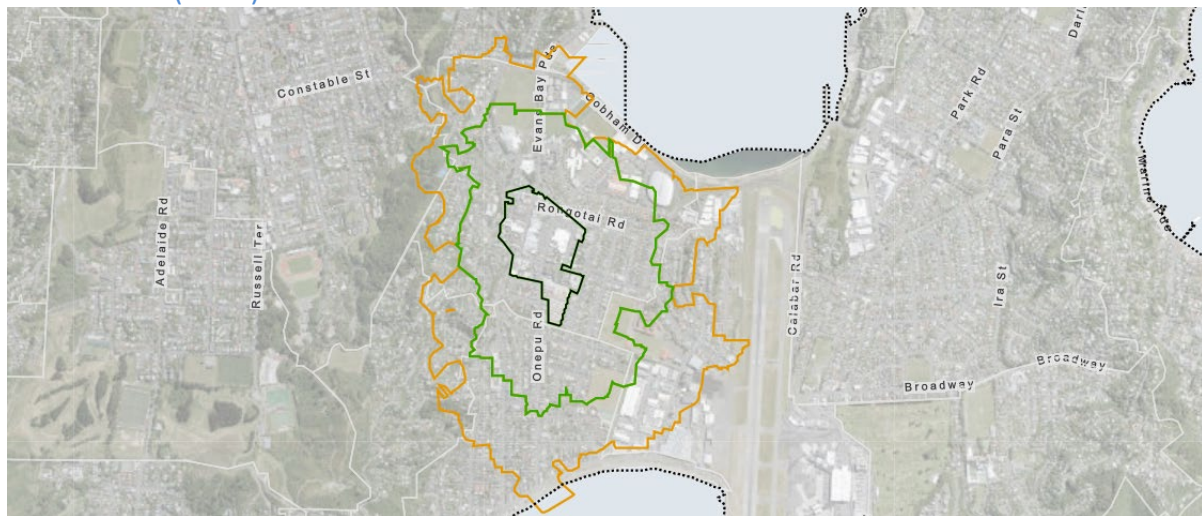
15a) Although the WCC claims it has applied the same walking catchment criteria used for Johnsonville also to Kilbirnie, the walking catchment area for Kilbirnie was requested and is yet to be provided by the WCC.

15b) As noted in 8a), the NPS-UD Impact area for Kilbirnie is also not on the WCC on-line Spatial Plan map even though this area is impacted.

- 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.

Below is the screenshot of the 5 minute (Green), and 10 Minute (Orange) walkable area for the Kilbirnie Centre (Black).



The building heights in the walkable area of Kilbirnie is between one to two storeys.

16) The criteria for specifying the walkable catchment for Medium density housing (type 3): 3-4 storey small apartment housing adjacent to suburban centres.

16a) While the WCC notes that “The Type 3 housing typology was not based solely on a walkable catchment basis”, the walkable catchment information that was used was requested and is yet to be provided by the WCC.

16b) As noted in 9(a), the NPS-UD Impact area is also not provided on the WCC on-line Spatial Plan map even though these areas are impacted.

- 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>

If you still require further clarification you can contact speak to John McSweeney Place Planning Manager on 04 803 8557.

On 23 November 2020, you have also requested additional information for the 15 documents released in IRO-10626. You have asked for:

- The date when the document was finalised by the WCC or, if not created by the WCC, received by the WCC.

- The author of the document or agency from which the document was sent (if not created by the WCC).
- If the document was sent as an email attachment, a copy of the email to which the document was attached.
- The recipient(s) of the document within the WCC for document 1, 6, 14 and 15.
- Where information has been withheld in a document, for each redaction, the grounds of LGOIMA under which the WCC has chosen to withhold information.

Item	Document name/description	When doc was finalised, author, who was sent document.
1.	Summary - Recommended version of the NPS-UD and Spatial plan implications.	July 2020 – Place Planning team. Shared internally with Chief City Planner. Redacted under section 7(2)(h) protects information where it is necessary to enable the agency that holds it to carry out commercial activities without prejudice or disadvantage.
2.	2020 08 13 Steering Group - 21 Report	August 2020 – Place Planning team. Documents lists receivers
3.	20200803 SPC Presentation - NPS UD and Draft Spatial Plan	August 2020 – Place Planning team. Receivers of documents listed in <a href="#">minutes</a>
4.	2020-08-06-agenda-spc	August 2020, Democracy Services Team. Receivers of document listed in <a href="#">agenda</a>
5.	2020-08-06-minutes-spc	August 2020, Democracy Services Team. Receivers of document listed in <a href="#">minutes</a>
6.	20200818 Presentation to Advisory Groups Draft Spatial Plan	August 2020 – Place Planning team. Receivers of document listed in <a href="#">minutes</a> .
7.	Tawa Community Board agenda 10 September 2020	September 2020 – Democracy Services team. Receivers of document listed in <a href="#">agenda</a>
8.	20200826 FINAL Tawa Community Board - Draft Spatial Plan	August 2020 – Place planning team. Receivers of document are members of <a href="#">Members of the board</a> .
9.	Cable Car - Email_Redacted	Details in email. Redactions are out of scope for request.
10.	Definition of rapid transit	Details in email.
11.	Is the Cable Car Rapid Transit - email	Details in email.
12.	NPS decision and actions	Details in email.
13.	Data on Kapiti and JVille Rail Lines	Details in email.
14.	NZIA Presentation	August 2020 – Place Planning team. presented to NZIA members who attended the presentation.
15.	NZPI 13 August Presentation	August 2020 – Place Planning team. Presented to NZPI members who attended the presentation.



**Right of review**

If you are not satisfied with the Council's response, you may request the Office of the Ombudsman to investigate the Council's decision. Further information is available on the Ombudsman website, [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

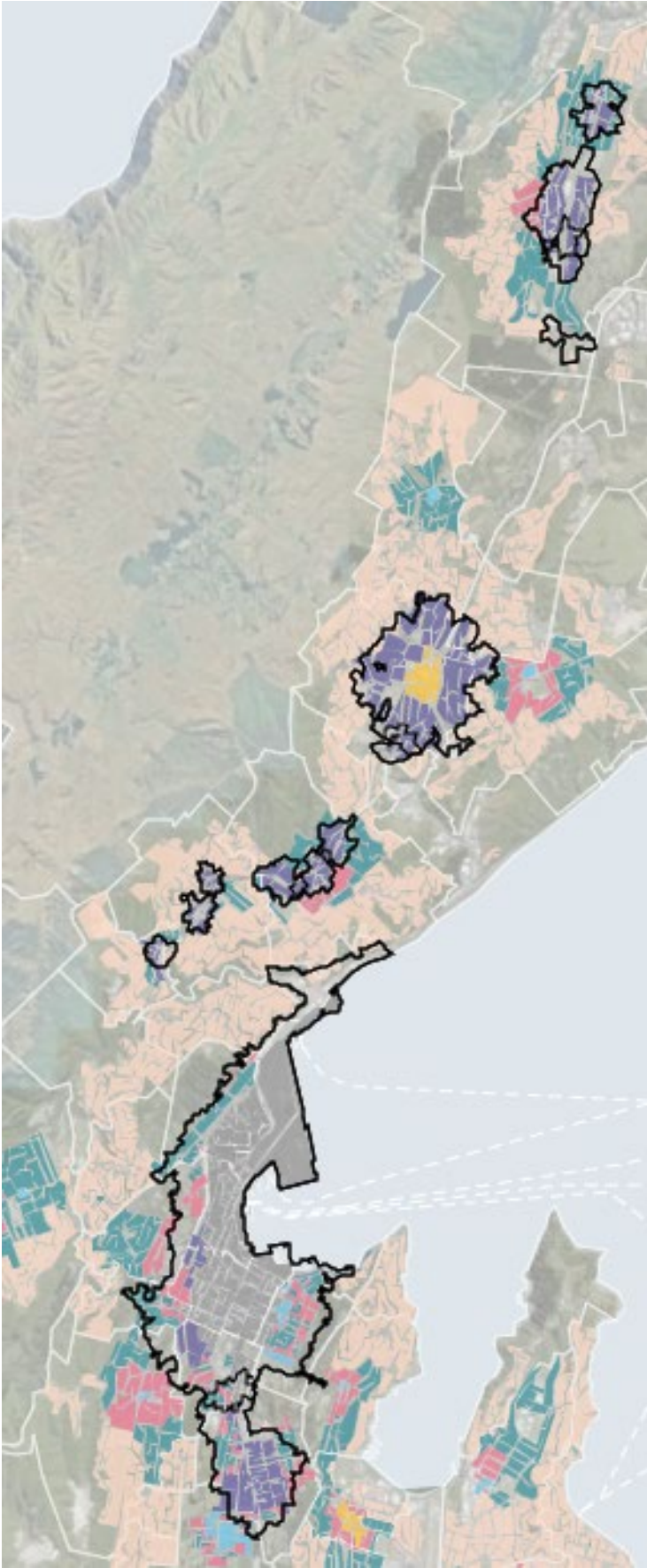
Thank you again for your request, if you have any question please feel free to contact me.

Kind regards



Asha Harry  
**Assurance Advisor**

Appendix one:



- NPS-UD Impacted Areas
- Proposed housing types
- Central City Area
- No change
- Type 1
- Type 2
- Type 3
- Type 4a
- Type 4b
- Type 5