

THE RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON PROPOSED WELLINGTON REGIONAL POLICY STATEMENT  
FOR THE WELLINGTON REGION 2009

TO: Greater Wellington Regional Council  
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1. **KIWI PROPERTY HOLDINGS LIMITED (“the Submitter”)**, c/o Barker & Associates Limited, at the address for service set out below, makes the following submission on the Proposed Regional Policy Statement for the Wellington Region 2009 (“PRPS”).
2. The Submitter has been actively involved in development of planning documents in the Wellington Region on matters such as retail redistribution and its associated effects; urban containment; urban design; and the need to ensure a hierarchy of centres. In addition, the Submitter has submitted consistently on the need to ensure that Wellington’s CBD and other regionally significant centres retain their vibrancy and vitality.
3. On the basis of the above, the Submitter is generally supportive of the PRPS and the manner in which it addresses the sustainable management of the greater Wellington Area. The Submitter considers that the PRPS takes a comprehensive approach to issues facing the region, such as regional form, design, function and retail redistribution and provides guidance on how to address these issues.
4. In particular the Submitter supports the following parts of the PRPS:
  - i. Those parts of the PRPS which emphasise the need for the application of the Regional Policy Statement across physical and jurisdictional boundaries, specifically Section 2.5;

- ii. The importance of the central business district of Wellington City ("CBD") for the Wellington Region, and its relationship to other Regionally Significant Centres within the centres hierarchy, along with the focus on maintaining the viability and vibrancy of the CBD and the other Regionally Significant Centres (Objective 21 and Policy 29 of the PRPS); and
  - iii. The inclusion in the PRPS of the need to contain development to existing centres wherever possible. Specifically Section 3.9 Regional form, design and function and the specific Issues, Objective and Policies which address this issue.
5. While the Submitter supports the intent of the PRPS, it considers that amendments are required in order that the PRPS:
  - i. Supports the sustainable management of natural and physical resources and is generally consistent with the purpose and principles of the Resource Management Act 1991;
  - ii. Will avoid inappropriate or significant adverse effects on the environment; and
  - iii. Warrants approval in terms of the tests set out in section 32 of the Resource Management Act.
6. In particular, without limiting the generality of the above, it is considered that changes should be made to strengthen the intention of the document. In addition, it is considered that a greater emphasis should be placed on the management of retail redistribution, due to its potential to undermine the maintenance of vibrancy and vitality within Regionally Significant Centres. A summary of these changes are provided below, with some specific suggested wording changes included as **Attachment 1** to this submission.

### Summary of suggested wording changes

#### Issues

- i. Clarify the issues specified under Section 3.9 Regional form, design and function so that there are clear linkages between these and the objectives, policies and methods that follow.

#### Objective 21

- ii. Reinforce the need for vibrancy and vitality in all of the regionally significant centres.

#### Policy 29

- iii. Include an emphasis on the need to control retail activity to encourage and protect the vitality and vibrancy of all of the regionally significant centres, whilst ensuring the maintenance and enhancement of the viability or vitality of the regional central business district as the preeminent centre in Wellington Region.

#### Expected Environmental Results

- iv. Include the maintenance of the viability and vitality of the regional central business district as a specific environmental result.
- v. Clarify the expected environmental results so that the desired results themselves are specified, as opposed to the means by which to achieve these results (i.e. policies, rules and methods).

#### Method 42

In addition to the specific wording changes provided in **Attachment 1**, while the Submitter supports the reference to the need to develop principles for retail activities as a method to achieving Objective 21, these principles should be located within the PRPS document itself rather than in a non-statutory document such as the Wellington Regional Strategy.

It is noted that Change 6 to the Auckland Regional Policy Statement (ARPS) was appealed on a similar basis. All parties involved in the ARPS process have agreed that the appropriate location for such guidance is in the ARPS

itself and the required changes to incorporate the retail principles are being made through the mediation process.

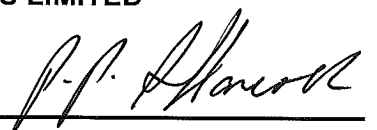
Regional Central Business District

Further suggested changes have also been made to reinforce that the regional central business district of Wellington City is at the top of the hierarchy of regionally significant centres and should therefore be given prominence with respect to the need to maintain its viability and vibrancy.

7. The Appellant seeks the following relief:
- i. That the PRPS be approved provided the provisions in the Plan Change in accordance with **Attachment 1** and to ensure that the concerns expressed in this submission are addressed fully; and
  - ii. Such other relief or other consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission.
8. The Submitter wishes to be heard in support of its submission.
9. The Submitter would consider presenting a joint case with any other party seeking similar relief.

DATED at Auckland this *8<sup>th</sup>* day of *June* 2009

**KIWI PROPERTY HOLDINGS LIMITED**  
by its duly authorised agents **BARKER & ASSOCIATES LIMITED**

  
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N J Roberts

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# Attachment 1

**Key: Suggested changes are shown with ~~strikethrough~~ and underline**

## Issue

### *Regional form, design and function*

#### 1. Poor quality urban design

Poor quality urban design can adversely affect public health, social equity, land values, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable resources and vehicle emissions in the region.

#### 2. Sporadic, uncontrolled and/or uncoordinated development

Uncoordinated and sporadic development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in:

- (a) new development that is poorly located in relation to existing infrastructure (such as roads, sewage and stormwater systems) and is costly or otherwise difficult to service;
- (b) development in locations that restrict access to the significant physical resource in the region – such as aggregate;
- (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities;
- (d) insufficient population densities to support public transport and other public services;
- (e) new infrastructure that can encourage development in locations that undermine existing centres and industrial employment areas;
- (f) loss of vitality and/or viability in the regional central business district of Wellington City and the other regionally significant centres; and
- (g) displacement of industrial employment activities from established industrial areas.

#### 3. Integration of land use and transportation

A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in:

- (a) increased emissions to air from a variety of pollutants, including greenhouse gases
- (b) increased use of energy and reliance on non-renewable resources

(c) reduced opportunities for alternate means of travel (such as walking and cycling) and increased costs associated with upgrading roads

(d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient operation of the transport network

(e) Inefficient use of existing infrastructure (including transport orientated infrastructure)

### **Objective 21**

A compact, well designed and sustainable urban form that has an integrated, safe and responsive transport network and:

- (a) a viable and vibrant regional central business district in Wellington city;
- (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality;
- (c) sufficient industrial-based employment locations or capacity to meet the region's needs;
- (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;
- (e) strategically planned rural development;
- (f) a range of housing (including affordable housing);
- (g) integrated public open spaces;
- (h) integrated land use and transportation;
- (i) improved east-west transport linkages; and
- (j) efficient use of existing infrastructure (including transport network infrastructure).

### **Policy 29**

#### **Maintaining and enhancing the viability and vibrancy of regionally significant centres – district plans**

District plans shall include policies, rules and/or methods that ~~encourage~~ enable and manage a range of land use activities (including retail activity) at a rate that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city as the preeminent centre and the following centres of regional significance:

- (a) Upper Hutt city centre;
- (b) Lower Hutt city centre;
- (c) Porirua city centre;
- (d) Paraparaumu town centre;
- (e) Masterton town centre
- (f) Petone town centre;
- (g) Kilbirnie town centre; and
- (h) Johnsonville town centre.

In achieving this District Plans shall ensure that the range of land use activities within the centres of regional significance listed in (a) – (f) shall not reduce the viability or vitality of the regional central business district in Wellington City.

#### Explanation

The region's central business district in Wellington city and the centres of regional significance identified in policy 29 were identified in the Wellington Regional Strategy as regionally significant centres for economic development, transport movement, civic and community investment.

The Wellington central business district is the regional central business district, with 73,000 people working there each day. The regional central business district is at the top of the hierarchy of regional centres and it is therefore important to ensure its viability and vibrancy is maintained above the other regionally significant centres. The *other regionally significant centres* are the civic centres of Upper Hutt city centre, Lower Hutt city centre, Porirua city centre, Paraparaumu town centre, Masterton town centre, and other major town centres of Petone, Kilbirnie and Johnsonville.

Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. The success of the other regionally significant centres must however not be achieved by reducing the viability or vitality of the regional central business district.

Although the range of appropriate land uses to be encouraged through this policy will vary depending on the character and context of each centre the need to manage the dispersal of retail activity is fundamental to achieving Objective 21. For this reason, policy 29 requires the region's district and city councils to determine the range of land uses (including retail activity) to be encouraged and/or controlled in order to maintain and enhance the viability and vibrancy of the relevant centre managed through its district plan. However, when maintaining and enhancing the regionally significant centres within a district, councils also need to consider the viability and vibrancy of the regionally significant centres outside their district, in particular the Wellington central business district.

#### Methods

Method 1: District plan implementation

Method 3: Wellington Regional Land Transport Strategy implementation

Method 4: Resource consents, notices of requirements and when changing, varying or replacing plans

Method 16: Information about locations with good access to the strategic public transport network

Method 18: Regional structure planning guide

Method 25: Information about the provision of walking cycling and public transport for development

Method 39: Sign the New Zealand Urban Design Protocol

Method 40: Integrate public open space

Method 41: Develop visions for the regionally significant centres

~~Method 42: Develop principles for retail activities [KIPT's submission is that these principles should be incorporated into the RPS, as opposed to a separate non-statutory document. Amendments to this effect have not been shown but will be presented at hearing.]~~

Method 43: Analyse industrial employment locations

Method 44: Analyse the range and affordability of housing in the region

Method 45: Develop planning frameworks for each Regional Focus Area

Method 46: Analyse the range and affordability of housing the region

### **Expected Environmental Results**

District plans:

(a) the regional central business district is given prominence as the top of the hierarchy of regionally significant centres;

(b) maintenance and enhancement of the viability and vibrancy of the all regionally significant centres but not at the expense of the regional central business district; and

(c) higher density and mixed use activities around locations with good access to the strategic public transport network.

There is an increase in the density and mix of land use activities in the regionally significant centres.

City and district councils have determined if they have key industrial employment locations, and if they have, they have been identified and protected in district plans.

The percentage of residents who agree that "I feel a sense of pride in the way my city looks and feels" is:

(a) over 80 per cent in Wellington city; and

(b) over 65 per cent for the rest of the region's city's and districts.

All new urban development is within the region's urban areas (as at March 2009); or in areas identified for urban development in a district growth framework or strategy; or in accordance with a structure plan.

There is a positive trend towards the 'key outcomes' in the Regional Land Transport Strategy.

All the 'good regional form' actions identified in the Wellington Regional Strategy are implemented.