

**Before the Independent Hearings Panel
At Greater Wellington Regional Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of Proposed Change 1 to the Regional Planning Statement for
the Wellington Region

**Statement of Joe Jeffries on behalf of Wellington City Council on the
'centres hierarchy' changes sought by Kāinga Ora**

Date: 25 October 2023

INTRODUCTION

- 1 The Hearing Panel for Proposed Change 1 to The Wellington Regional Policy Statement (RPS PC1) have invited territorial authorities to provide comments in writing on the ‘centres hierarchy’ changes Kāinga Ora seek to Policy 30 of the Regional Policy Statement (RPS). The Hearing Panel would like to understand what impacts territorial authorities think Kāinga Ora’s relief would have on their planning instruments and processes.

BACKGROUND

Kāinga Ora’s proposed changes to Policies 30 and 31 of RPS PC1

- 2 Kāinga Ora’s proposed changes to Policy 30 are set out in the statement of evidence of Matt Heale. Of relevance to Wellington City Council, Kāinga Ora seek to include Miramar, Tawa, and Newtown as “Larger Urban Area” Town Centres in the regional centres hierarchy under Policy 30.
- 3 Kāinga Ora also seek changes to Policy 31 to require tier 1 territorial authorities to enable high density development within, and within a walkable catchment of, Town Centres in larger urban areas. This amendment would apply to Miramar, Tawa, and Newtown if Kāinga Ora’s requested change to Policy 30 were accepted.

Wellington Proposed District Plan (PDP)

- 4 The Wellington PDP does not include a Town Centre Zone (TCZ) in its centres hierarchy and applies a Local Centre Zone (LCZ) to Miramar, Newtown, and Tawa.
- 5 The Wellington PDP enables the following building heights within these Local centres, and within their respective walkable catchments:

Local Centre	Height in Local Centre	Zone and building height in walkable catchment of LCZ
Miramar	22m	Medium Density Residential: 11 – 14m.
Newtown	22m (except 12m for heritage buildings)	High Density Residential: 21m (except in the Newtown Shopping Centre heritage area, which has a 12m height limit and the MRZ-PREC01 Character Precincts where the MRZ 11m height limit applies).
Tawa	22m	High Density Residential: 21m; Medium Density Residential: 11 – 14m.

Table 1 – PDP building height and density in and within walkable catchments of the local centres of Miramar, Newtown and Tawa.

Kāinga Ora submission on the Wellington PDP

6 In their submission on the Wellington PDP Kāinga Ora requested that a new Town Centre Zone be incorporated into the PDP centres hierarchy and that Miramar, Newtown and Tawa be rezoned from LCZ to TCZ. Kāinga Ora also sought the expansion of the spatial extent of these centres and for high density residential development to be provided within a walkable catchment of these centres. In summary, Kāinga Ora sought:

- Introduction of a TCZ to be applied at Miramar, Newtown and Tawa enabling building heights of 8 to 10 storeys.
- The provision of High Density Residential zoning enabling 6 to 8 storeys within a ten minute walkable catchment of these centres.

7 Kāinga Ora have presented evidence on these submissions to the Wellington City PDP Independent Hearings Panel.

8 The Wellington City Council reporting officers have recommended to reject the Kāinga Ora submission seeking introduction of a TCZ and to generally retain the notified zoning in and around Miramar, Newtown, and Tawa.

9 In summary, the Wellington City Council reporting officers provided the following reasons for these recommendations in the relevant s42A and right of reply reports:¹

- The zoning and level of development enabled in these centres is commensurate with the level of commercial activity and community services in accordance with Policy 3(d) of the NPS-UD.
- The zoning is also generally consistent with the Council's Spatial Plan², which in turn is based on the Wellington Outer Suburbs Assessment and Evaluation³ by Beca and Studio Pacific Architecture.
- The addition of a TCZ would add an additional level of complexity to the District Plan that is not necessary, particularly as the LCZ enables the same range of activities as would be enabled in the TCZ, and the outcomes sought by Kāinga Ora can be achieved through modified LCZ building heights.

10 However, the Wellington City reporting officers also recommended the following changes in Tawa, Miramar, and Newtown in response to Kāinga Ora:

- Increasing the building heights in the Tawa and Newtown LCZ from 22m to 27m.⁴

¹ [Section-42a---overview-and-general-matters-for-commercial-and-mixed-use-zones.pdf \(wellington.govt.nz\)](#)
[Right of reply responses of Lisa Hayes - MCZ, LCZ, NCZ, MUZ & COMZ \(wellington.govt.nz\)](#)

² Wellington City Council Our City Tomorrow: Spatial Plan for Wellington City, adopted 24 June 2021

³ Beca and Studio Pacific Architecture, [Wellington Outer Suburbs Assessment and Evaluation prepared for Wellington City Council](#), 03 March 2020

⁴ [Section-42a-report---part-3---local-centre-zone.pdf \(wellington.govt.nz\)](#)

- Increase the extent of the High Density Residential zoning around Newtown and Tawa.⁵

IMPACTS OF KĀINGA ORA’S REQUESTED AMENDMENTS TO POLICY 30 ON THE WELLINGTON INTENSIFICATION PLANNING INSTRUMENT (IPI)

- 11 All hearings are now complete for the Wellington Intensification Streamlined Planning Process (ISPP) and decisions on the IPI are due in March 2024. The decisions on the Wellington IPI will take into account the Kāinga Ora submissions and evidence presented on their requested amendments to the centres hierarchy and to the development enabled within and around the Tawa, Newtown, and Miramar centres.
- 12 The notified and officer’s recommendation versions of the Wellington PDP are consistent with the notified and officer’s rebuttal versions of Policies 30 and 31 of RPS PC1 with regards to Tawa, Newtown, and Miramar.
- 13 The decisions on RPS PC1 are scheduled to be delivered after the decisions on the Wellington IPI. If the RPS hearings panel were to accept Kāinga Ora’s requested amendments to Policy 30 and 31, this would likely require changes to the Wellington PDP which would need to be implemented through a separate plan change process once the Wellington IPI is operative. The RPS changes would likely require the Wellington City District Plan change to:
- Introduce a Town Centre zone to the PDP centres hierarchy.
 - Apply the Town Centre zoning to Miramar, Tawa, Newtown.
 - Extend the spatial extent of the High Density Residential zoning within the walkable catchment of the Tawa centre.

⁵ [Hearing stream 1 – Section 42a Report – Part 1 plan wide matters and strategic direction \(wellington.govt.nz\)](https://www.wellington.govt.nz/section-42a-report)

- Rezone the walkable catchment of the Miramar centre from Medium Density Residential to High Density Residential.

- 14 In effect this would mean re-litigation of a recent decision on the issue of the zoning and development enabled within and around Newtown, Miramar, and Tawa, in which Kāinga Ora has already presented evidence.
- 15 The issues of including a Town Centre zoning in the Wellington PDP centres hierarchy, the zoning of the Tawa, Newtown, and Miramar centres, and the level of development enabled in these areas have been considered at length through the Wellington IPI hearings process. This included consideration of submissions which sought a lower level of development in these areas than that enabled by the PDP or in officer's recommendations. The rationale for the Wellington City Council reporting officer's recommendations on these issues is set out in the relevant s42a and right of reply reports.⁶
- 16 Relitigating these issues through amendments to Policies 30 and 31 of the RPS, and initiating a subsequent plan change to the Wellington PDP, would impose significant costs and uncertainty on Wellington City Council and the public. In my view these costs would exceed any potential value added in terms of achieving regional consistency or the built form outcomes intended.

Joe Jeffries

25 October 2023

⁶ [Hearing stream 1 – Section 42a Report – Part 1 plan wide matters and strategic direction \(wellington.govt.nz\)](#)
[Council Officers right of reply - Hearing stream 1 \(wellington.govt.nz\)](#)
[section-42a---overview-and-general-matters-for-commercial-and-mixed-use-zones.pdf \(wellington.govt.nz\)](#)
[Right of reply responses of Lisa Hayes - MCZ, LCZ, NCZ, MUZ & COMZ \(wellington.govt.nz\)](#)