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WELLINGTON REGIONAL COUNCIL SUBMISSION

ON

VARIATION NO. 17 TO THE WELLINGTON CITY COUNCIL

PROPOSED DISTRICT PLAN

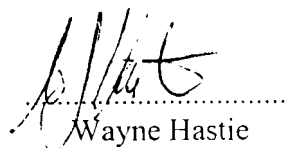
To: The Wellington City Council

Submission on: **Variation no. 17** to the Wellington City Council Proposed District Plan.

The specific provisions of the variation no. 17 to which this submission relates are set out on the following pages. The submission states the decisions sought from the Wellington City Council, and gives reasons for seeking those decisions.

The Wellington Regional Council wishes to be heard in support of its submission.

If others make a similar submission, the Regional Council would be prepared to consider presenting a joint case with them at any hearing.



Wayne Hastie
Manager, Resource Policy

3/2/00
Date

Address for service:

Wellington Regional Council
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WELLINGTON
Attn: Richard Peterson

Across Plan Submissions

Submission: **Complete** a full assessment of the transport implications of the Lambton Harbour **Concept** Plan which **is** provided **for** by variation 17.

Reason: Several of the submission points which follow relate to the impact that the development of the Lambton Harbour Area will have on Wellington's strategic road network. In particular, the Regional Council is concerned about the impact that the completion of the Lambton Harbour Concept Plan will have on the waterfront route.

Careful consideration needs to be given to the link between the waterfront route and the proposed Inner City Bypass before the variation is confirmed. Down-grading of the waterfront route, which would seem a natural consequence of the current development proposal for the Lambton Harbour Area, should not be undertaken without the Inner City Bypass.

Other submission points relate to the circulation of vehicles, pedestrians and cyclists to, from and within the Lambton Harbour Area.

There are two aspects to the Regional Council's concern about pedestrian and cycle access. The first is the technical aspects of ensuring that movement within and through the Lambton Harbour Area can be undertaken safely and conveniently. Whilst the Regional Council encourages the provision of on-site loading areas, these areas, along with the provision of carparks, may impact on pedestrian and cycle movement.

The second is the principle of providing public access to the coast. Incorporating this access into the Lambton Harbour development is consistent with the New Zealand Coastal Policy Statement and the Wellington Regional Policy Statement.

These circulation concerns are inter-connected with the strategic issues mentioned above. If the Regional Council's submission points are addressed on an individual basis, without an overall assessment, there is the potential for unintended and adverse transport effects to result. For this reason a full assessment of the transport implications of the Lambton Harbour Concept Plan should be completed before a decision is made on variation 17.

Submission: **Amend** the appropriate objectives, policies and maps so that provision is made within the variation for an internal bus route along the proposed Whitmore Lane, from Whitmore Street to the Queens Wharf Access.

Reason: Including provision for this service is consistent with theme 1.1 (“Expand and enhance urban public passenger transport”) and policy 1.1.1 (“Improve the accessibility of public transport”) of the Regional Land Transport Strategy.

Submission: **Include** provision for cycling within the Lambton Harbour Area

Reason: The Regional Council is concerned that while the variation makes reference to pedestrian access, it does not include provision for other forms of non-motorised transport. In particular, cycle routes exist in Oriental Parade and one is proposed in Bunny Street. Ensuring that cyclists have access through the Lambton Harbour Area, as a link between these cycle routes, is very important. References to pedestrian access, e.g. in the variation to section 12.1.4 of the Proposed Plan, should be extended to include other forms of non-motorised traffic including cycling.

Including these references would maintain the District Plan’s consistency with the Regional Land Transport Strategy, in particular with policy 5.1.2 “Make cycling and walking more attractive”.

Section: **12.2.6.7 Consistency in administration across mean high water springs.**

Submission: **Amend** the references to Regional Coastal Plan policies so that they reflect the changes that will be made to policy numbers in the Regional Coastal Plan once it is made operative.

Reason: As a result of references on the Proposed Regional Coastal Plan the numbering of some of the relevant policies will need to change. The City Council should check with the Regional Council before it prints any formal documents that refer to Regional Coastal Plan policies.

Section: **13.1.1.7, 13.1.1.7.2 & 13.3.1 Car-parking Maxima**

Submission: Oppose the carpark maxima contained in these two provisions.

Support the qualification to standard 13.1.1.7.2 which states that:
For individual developments providing more than 70 parking spaces, Rule 13.3.3 applies.

Reason: 13.1.1.7.2 allows 2,200 carparks as a permitted activity. 13.3.1 allows developers to apply for resource consent for a further 10 % of carparks as a discretionary activity.

While the Regional Council would normally support provisions which restrict the maximum number of carparks in the Lambton Harbour Area, further analysis of the impact of carparking needs to be completed. In particular, this analysis needs to assess the impact that the likely distribution and level of this parking will have on the operation of the waterfront route and the wider road network. Until such analysis is complete, the potential effects of these provisions are unknown and, therefore, they cannot be supported.

The Regional Council supports the requirement for resource consent for any individual proposal including more than 70 parks because such large parking provision can create congestion at its point of access. As a result the effectiveness of the waterfront route would be reduced.

Section: 13.1.1.7.7 Servicing

Submission: Oppose the inclusion of the note which excludes activities in the Lambton Harbour Area from the standards in 13.1.1.7.7.

Reason: The waterfront route is a significant part of the Region's strategic road network. If the requirement to provide servicing is removed from the Lambton Harbour Area, and servicing has as a result to take place from the strategic road network, there will be resulting adverse impacts on the effectiveness of this route.

Therefore allowing the exemption from servicing would be inconsistent with theme 1.2 ("Improve effectiveness of the strategic road network") of the Regional Land Transport Strategy.

Section: 13.1.1.7.15 & Appendix 5 Access points to the Lambton Harbour Area

Submission: Amend these two parts of the variation to reflect the following changes:

- Delete the proposed access between Bunny and Whitmore streets.
- Limit the use of the Queens Wharf access to pedestrians, buses and service vehicles.
- Delete the proposed access opposite Willeston Street.
- Limit the use of the proposed access between Willeston and Harris Street to left in and left out only.
- Limit the proposed access at the junction of Cable and Wakefield Street to left in and left out only.

Reason: Again the Regional Council wishes to emphasise the significance of the waterfront route within the Region's strategic road network. Providing

access points as indicated in Appendix 5 would adversely impact on the effectiveness of the waterfront route. In the case of the access at the junction of Cable and Wakefield Streets, it would also significantly reduce the level of safety.

Section: 1X1.1.7.16 Vehicle entry on public access areas.

Submission: **Support** the inclusion of this provision.

Reason: The inclusion of this provision is consistent with policy 5.1.2 (“Make cycling and walking more attractive”) of the Regional Land Transport Strategy.

Section: Variation section C. Alterations to Maps

Submission: **Amend** the plan attached to the variation labelled “Wellington City Proposed District Plan, Proposed Variation 17, Boundaries” so that

1. It is clear whether the variations to the Planning Maps are intended to show the existing line of mean high water springs or the line that will exist once the Lambton Harbour Concept Plan has been completed.
2. It is clear whether the outer line of the wharf structure is intended to be that which exists now or that which will exist once the Lambton Harbour Concept Plan is completed.
3. The following roads are not included within the Lambton Harbour Area:
 - Waterloo Quay;
 - Customhouse Quay;
 - Jervois Quay; and
 - Cable Street.

Reason: The Regional Council intention is to ensure that the District Plan Maps (as they are finally produced) do not contain any inconsistencies or inaccuracies. Currently the plans attached to the variation are inconsistent in that in some parts they illustrate the situation as it is now while in other parts they illustrate the situation as it will be once the concept plan is complete. This inconsistency should be rectified.

Including the four roads listed above within the variation gives the impression that they are service roads for the Lambton Harbour Area. This undermines the importance of the waterfront route within the Region's strategic road network. It also fails to reflect the integral relationship between the waterfront route and the proposed Inner City

Bypass and the fact that the waterfront route requires attention in its own right. For these reasons, the waterfront route should be excluded from the variation.

Submission: **Amend** the plan attached to the variation labelled “Wellington City Proposed District Plan - Proposed Variation 17. Lambton Harbour Maximum Building Heights and Public Access Areas” so that

1. It is clear whether the variations to the Planning Maps are intended to show the existing line of mean high water springs or the line that will exist once the Lambton Harbour Concept Plan has been completed.
2. It is clear whether the outer line of the wharf structure is intended to be that which exists now or that which will exist once the Lambton Harbour Concept Plan is completed.
3. The plan does not include controls on the maximum building heights for buildings within the Coastal Marine Area.
4. The following roads are not included within the Lambton Harbour Area:
 - Waterloo Quay;
 - Customhouse Quay;
 - Jervois Quay; and
 - Cable Street.

Reason: The Regional Council intention is to ensure that the District Plan Maps (as they are finally produced) do not contain any inconsistencies or inaccuracies. Currently, the plans attached to the variation are inconsistent in that in some parts they illustrate the situation as it is now while in other parts they illustrate the situation as it will be once the concept plan is complete. This inconsistency should be rectified.

While the Regional Council recognises that the inclusion of the maximum building heights for the buildings within the Coastal Marine Area is for information purposes only, it is concerned that this may cause confusion. Such height limits can only have statutory effect if they are included in the Regional Coastal Plan. The proposed maximum limits should therefore be removed from the variation.

Including the four roads listed above within the variation gives the impression that they are service roads for the Lambton Harbour Area. This undermines the importance of the water front route within the region’s strategic road network. It also fails to reflect the integral relationship between the waterfront route and the proposed Inner City Bypass and the fact that the waterfront route requires attention in its

own right. For these reasons the waterfront route should be excluded from the variation.