**DPA Submission on the Wellington City Proposed District Plan**

**Submitted to Wellington City Council via online submission form 12 September 2022**

The specific provision of the plan that my submission relates to:

Centres and Mixed Use Design Guide; Residential Design Guide; Commercial and Mixed Use Centre City Zone; High Density Residential Zone; Energy, Infrastructure and Transport

## Summary:

DPA is providing this submission for the Wellington City Council in consideration of its District Plan for the city. The focus of this submission is on two key areas: firstly, housing intensification; secondly, transport infrastructure (micromobility).

DPA has some concerns about the proposed housing intensification process which has come about due to amendments made by Government to the Resource Management Act last year. These stem from the fact that many of the houses which may well be built under the new provisions will be no more than three storeys in height on average. If this is increasingly the case, it will mean that due to the provisions of the Building Act 2004 which do not require, for example, the installation of lifts in buildings of less than three storeys, these types of dwellings will remain largely inaccessible to disabled people.

However, these concerns have been ameliorated by the proposed accessibility guidelines in the form of the Centres and Mixed Use and Residential Design Guides which will become part of the District Plan. DPA supports the adoption of these guides as they will provide the definitive minimum standards required for housing and building construction in the city going forward. However, DPA will be making recommendations that each of the design guides are amended with the overall intention that certain provisions will be either clarified and/or strengthened in order to ensure the greater uptake of accessibility requirements by developers, planners, builders and homeowners/house builders. We also propose other amendments within both the High and Medium Density Residential Zone sections in order to achieve the same and to also make the point that it is perfectly fine to use disabled person first language instead of the more euphemistic term 'abilities' when referring to disabled people.

In this regard, Council will find that DPA's comments relate to the need to increase the numbers of accessible housing units available for disabled people through the increased adoption of universal design in all housing and public building builds across the city. This is the case as organisations including, for example, Lifemark (which assesses homes and buildings on whether they meet universal design standards) have pointed out that only 1% of all private dwellings in this country are currently accessible to disabled people. Therefore, building more accessible homes with a wide range of design features is crucial if housing choice is to become a reality for disabled people in Wellington City. These could include stipulations being developed whereby all lower floor apartments and single storey housing can only be consented by Council if designs for these comply with universal design standards using the design guides as a minimum starting point.

DPA is likely to submit in the second round and will also continue to collaborate with other organisations, including, for example, Generation Zero, disability and community groups during this process to produce a final plan which will meet the goals of building a more accessible, inclusive, carbon neutral city.

Wellington City Proposed District Plan – multiple submission points table

You can attach this table when making your submission via the [online PDP submission form](https://eplan.wellington.govt.nz/proposed/rules/0/301/0/0/0/31) or by downloading our [submission form](https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/proposed-district-plan-submission-form.pdf) and emailing it to us at PDPsubmissions@wcc.govt.nz

**Submitter Name: Disabled Persons Assembly (DPA) New Zealand – Wellington Region**

**Please add a new row for every specific and unique point you would like to submit on.**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Chapter / Sub-part**Please identify what part of the plan your submission point relates to – this could be a subpart or chapter heading within the plan. i.e. General Rural Zone  | **Specific provision / matter**Please identify the specific provision or matter your submission point relates to – this could be a specific objective, policy, rule, standard, or a more general matter that relates to a whole chapter, topic, zone, or overlay. i.e. GRUZ-O1 | **Position**Please indicate whether you support, oppose, or seek to amend the specific provision / matter.i.e. Support  | **Reason for submission**Please provide reasoning to support your position. This could be a detailed explanation, technical information, or simply stating you support the intent of the provision. i.e. Support the direction or GRUZ-O1 to provide for rural activities.  | **Decisions requested / relief sought** Please indicate whether you are seeking to retain the provision as notified in the PDP, delete the provision, or are seeking amendment. If you are seeking to amend a provision please set this out using ~~strikethrough~~ to indicate deletion and underline to indicate additional text. i.e. Retain GRUZ-O1 as notified.  |
| **Centres and Mixed Use Guide** | * + - Section G37:
		- “Entrances should be of adequate dimensions to provide universal access for all and allow for movement from a wide range of users, including moving furniture and wheelchairs.”
 | **Amend** | **Insert the word ‘must’ so that there is a greater emphasis on the need to meet standards in order to ensure that there is greater compliance and uptake from designers, developers and builders.** | Amend Section G37:* + - “Entrances ~~should~~ must be of adequate dimensions to provide universal access for all and allow for movement from a wide range of users, including moving furniture and wheelchairs.”
 |
| **Centres and Mixed Use Guide** | * + - Section G39:
			* “Where possible, ensure dwellings on the ground floor have a step-free entry”
 | **Amend** | **Delete the words ‘where possible’ and simply start the sentence with ‘ensure dwellings on the floor have a step-free entry’ in order to emphasise the need for greater compliance and uptake from designers, developers and builders.** | * + - Amend Section G39:
			* “~~Where possible~~, ensure dwellings on the ground floor have a step-free entry”
 |
| **Centres and Mixed Use Guide** | * + - Section G53:
			* “Developments designed for limited mobility users should provide an accessible link between parking spaces and their associated unit.”
 | **Amend**  | **Delete the word ‘should’ and replace it with ‘must’ to emphasise the need for greater compliance and uptake from designers, developers and builders.** | * + - Amend Section G53:
			* “Developments designed for limited mobility users ~~should~~ must provide an accessible link between parking spaces and their associated unit.”
 |
| **Centres and Mixed Use Guide** | * + - Section G91:
			* “For developments that are likely to be occupied by people with limited mobility, where possible, provide ground level access that is accessible by people using wheelchairs, and design units with reference to New Zealand standards for access and mobility. Consider things such as:
				+ Lever handles on all doors
				+ Easy to reach window sills, power sockets and light switches
				+ Sufficient space to access storage spaces including wardrobes
				+ Ensuring flush levels between rooms, at entryways, and shower access
				+ Ensuring smoke alarms have both visual and audible alerts
				+ Best practice guidance for accessible kitchen, laundry and bathroom design
				+ Best practice standards for signage legibility and colour contrast
 | **Amend**  | **Amend the last sentence before the suggested requirements by deleting the word ‘consider’ and replacing it with ‘Ensure that things such as: ...’ This will emphasise the need for greater compliance and uptake on these needs from designers, builders and developers.** | * + - Amend Section G91:
			* “For developments that are likely to be occupied by people with limited mobility, where possible, provide ground level access that is accessible by people using wheelchairs, and design units with reference to New Zealand standards for access and mobility. ~~Consider~~ Ensure that things such as:”
 |
| **Centres and Mixed Use Guide** | * + - Section G116:
			* “Where possible, ensure ground level dwellings and all habitable rooms are designed for accessible and practical use.
				+ Consider having the kitchen, a bathroom and a bedroom on the ground level.
				+ Consider transition between rooms, and the ability to turn and manoeuvre mobility devices.”
 | **Amend**  | **Delete the words where possible, and just begin the sentence with ‘Ensure ground level dwellings and all habitable rooms are designed for accessible and practical use” to ensure greater compliance and uptake on these needs from designers, builders and developers.** | * + - Amend Section G116:
			* “~~Where possible~~, Ensure ground level dwellings and all habitable rooms are designed for accessible and practical use.
 |
| **Centres and Mixed Use Guide** | * + - Section G117:
			* “Ensure circulation and spaces within dwellings are efficiently planned and wide enough to optimise amenity, accessibility and flexibility in use and provide legible wayfinding.”
 | **Support** | **Support the intent and purpose of G117 as this provision will ensure uptake and compliance from designers, builders and developers.** | Support for this provision to stay as written. |
| **Centres and Mixed Use Guide** | * + - Section G132:
			* “Ensure developments are inclusive of people of all ages and abilities, including the ageing population, children and pregnant women or parents with infants and toddlers.”
 | **Amend** | **Delete the word ‘abilities’ and replace it with impairments since the intention is to refer to disabled people. Using the term ‘abilities’ to refer to disabled people is regarded as euphemistic by many within the disabled community. It also makes it clear for builders and developers reading the manual and associated documents as to which group is being referred to in this instance.** | * + - Amend Section G132:
			* “Ensure developments are inclusive of people of all ages and ~~abilities~~, impairments including the ageing population, children and pregnant women or parents with infants and toddlers.”
 |
| **Centres and Mixed Use Guide** | * + - Section G133:
			* “Where possible, provide ground-level access that is accessible by people using wheelchairs, and design units with reference to NZ standards for access and mobility”
 | **Amend** | **Delete the words ‘Where possible, provide’ and replace with ‘Ensure ground-level access that is accessible by ...’ as a means of gaining greater compliance and uptake by designers, builders and developers.** | * + - Amend Section G133:
			* ~~“Where possible, provide~~ Ensure ground-level access that is accessible by people using wheelchairs, and design units with reference to NZ standards for access and mobility”
 |
| **Residential Design Guide** | * Section G37:
* “Entrances should be of adequate dimensions to provide universal access for all and allow for movement from a wide range of users, including moving furniture and wheelchairs.”
 | **Amend** | **Delete the word ‘should be’ and replace these with the words ‘must be of adequate dimensions’ as a means of ensuring greater compliance and uptake by designers, builders and developers.** | * Amend Section G37:
* “Entrances ~~should be~~ must be of adequate dimensions to provide universal access for all and allow for movement from a wide range of users, including moving furniture and wheelchairs.”
 |
| **Residential Design Guide** | * Section G39:
* “Where possible, ensure dwellings on the ground floor have a step-free entry.”
 | **Amend** | **Delete the words ‘where possible’ and begin the sentence with ‘ensure’ so as to encourage greater compliance and uptake by designers, builders and developers.** | * Amend Section G39:
* “~~Where possible~~, Ensure dwellings on the ground floor have a step-free entry.”
 |
| **Residential Design Guide** | * Section G53:
* Developments designed for limited mobility users should provide an accessible link between parking spaces and their associated unit
 | **Amend** | **Delete the word ‘limited mobility users’ and replace it with ‘people with mobility impairments, i.e., wheelchair users, mobility aid users, etc’ as the actual intention is to refer to this grouping of the disability community. This would aid in clarifying matters and the definition of what is meant by limited mobility for designers, builders and developers reading the manual and associated documents as to which group is being referred to in this instance.** | * Amend Section G53:
* Developments designed for ~~limited mobility users~~ people with mobility impairments, i.e., wheelchair users, mobility aid users, etc, should provide an accessible link between parking spaces and their associated unit
 |
| **Residential Design Guide** | * Section G76:
* Be flat, but may incorporate changes in level where these are designed to add to the visual and functional amenity of the space
 | **Amend** | **Add that ‘Changes in level should be properly ramped’ as an additional sentence to this part of the section.** | * Amend Section G76:
* Be flat, but may incorporate changes in level where these are designed to add to the visual and functional amenity of the space. Changes in level should be properly ramped.
 |
| **Residential Design Guide** | * Section G78:
* Where possible, provide communal spaces for social interaction and outdoor activities, including kitchenettes.
 | **Amend** | **Insert the term ‘accessible’ so that these spaces can be, where established, accessible to all people including disabled people and this should include kitchenettes.** | * Amend Section G78:
* Where possible, provide accessible communal spaces for social interaction and outdoor activities, including kitchenettes.
 |
| **Residential Design Guide** | * Section G81:
* Assign private open space to individual units of a type and quality appropriate to the dwelling typology, wherever possible
 | **Amend** | **Insert the term ‘accessible’ before open space to indicate that sometimes balconies are inaccessible to disabled people, particularly wheelchair or mobility aid users due to the fact that too often balconies are too small to accommodate wheelchairs or mobility aids and lips can be difficult to negotiate.** | * Amend Section G81:
* Assign private accessible open space to individual units of a type and quality appropriate to the dwelling typology, wherever possible
 |
| **Residential Design Guide** | * Section G86:
* On sloping sites, a balcony or deck can be an acceptable design response in order to achieve liveability and a good interface with indoor living areas.
 | **Support** | **We support on the proviso that people utilising the guides understand the concept of full accessibility.** | * Support for this provision to stay as written.
 |
| **Residential Design Guide** | * Section G91:

Waste storage space should be:* Conveniently accessible from the dwelling or dwellings served whilst being secure from access to the public
 | **Support** | **Support on the basis that the concept of accessibility as it applies to the needs of disabled householders is understood.** | * Support for this provision to stay as written.
 |
| **Residential Design Guide** | Integrate large scale plant fixtures such as vents and transformers as explicit and coherent parts of the overall architectural composition. This may be part of the roof or at the ground or basement level.* Section G96: Suitable space for natural or open-air laundry drying should be provided, within or accessible from each dwelling, but not within the defined ‘principal area’ or within shared open spaces that might be used for gathering.
* Section G97: Smaller-scale external service elements such as air conditioning units, water heating units, gas bottles and water tanks, should not be visible from the public realm, dominate entrances or be located in the principal area of private open space or within shared open gathering spaces.
* Section G98: Where possible, integrate any necessary security features into buildings or public spaces by designing them intrinsic, unobtrusive, or positive decorative features.
 | **Amend** | **All of these large scale plant fixtures need to be placed at accessible heights or in such a way that they can be easily adjusted by the householder concerned, and this includes by disabled people. This can be done by adding an additional sentence calling for this on the first paragraph leading into sections 96-98.** | * Amend lead paragraph of Sections G96-98 after the sentence ‘This maybe part of the roof or at the ground or basement level. Any and all large plant fixtures should be placed at accessible heights where they can be easily adjusted by the householder concerned, including by any disabled person.’
 |
| **Residential Design Guide** | * Section G106:
* Ensure new development fits well within the local context. Where they are determining features of local context, identify and positively contribute to patterns of: Architectural composition and roof form
* Alignment of key elevational lines including roof, parapet, verandah, windows, balconies and doors
* Proportions of forms and openings
* The visual rhythm of frontage widths and openings
* Floor-to-floor heights
* Materials, finishes and textures
 | **Support** | **Support on the proviso that these provisions comply with updated architectural practises, including around accessibility.** | Support for this provision to stay as written. |
| **Residential Design Guide** | * Section G116.

• Where possible, ensure ground level dwellings and all habitable rooms are designed for accessible and practical use. » Consider having the kitchen, a bathroom and a bedroom on the ground level. » Consider transition between rooms, and the ability to turn and manoeuvre mobility devices | **Amend** | **Amend the first sentence to omit the words ‘Where possible’ as this is very weak and strengthen it by beginning the sentence at the word ‘ensure’ as a means of gaining greater compliance and uptake by designers, builders and developers. Also extend the second sentence to include the need for a lounge on the ground floor as, otherwise, people can be isolated upstairs if there is a dwelling with more than one storey.** | * Section 116
* ~~Where possible,~~ Ensure ground level dwellings and all habitable rooms are designed for accessible and practical use. » Consider having the kitchen, a bathroom, a lounge and a bedroom on the ground level. » Consider transition between rooms, and the ability to turn and manoeuvre mobility devices
 |
| **Residential Design Guide** | * Section G132
* Ensure developments are inclusive of people of all ages and abilities, including the ageing population, children and pregnant women or parents with infants and toddlers.
 | **Amend** | **Amend the first sentence by deleting the word ‘abilities’ and replace it with impairments as the actual intention is to refer to disabled people. Using the term ‘abilities’ to refer to disabled people is regarded as euphemistic by many within the disabled community. It makes it clear for builders and developers reading the manual and associated documents as to which group is being referred to in this instance. The last sentence should include other examples of impairment-based groups to be covered under the impairment umbrella including wheelchair users and people who use mobility aids, i.e., crutches.** | * Section G132
* Ensure developments are inclusive of people of all ages and ~~abilities~~ Impairments , including the ageing population, children and pregnant women or parents with infants and toddlers, and people who use mobility aids such as wheelchairs and crutches.
 |
| **Residential Design Guide** | * Section G133

• Where possible, provide ground-level access that is accessible by people using wheelchairs, and design units with reference to NZ standards for access and mobility.Consider things such as: * Lever handles on all doors
* Easy to reach window sills, power sockets and light switches
* Sufficient space to access storage spaces and wardrobes
* Ensuring flush levels between rooms, at entryways, and shower access
* Ensuring smoke alarms have both visual and audible alerts
* Best practice guidance for accessible kitchen, laundry and bathroom design
* Best practice
 | **Amend** | **Delete the words ‘Where possible’ as this is very weak and strengthen it by beginning the sentence at the word ‘provide’ as a means of gaining greater compliance and uptake by designers, builders and developers.** | * Section G133

• ~~Where possible~~ Provide ground-level access that is accessible by people using wheelchairs, and design units with reference to NZ standards for access and mobility.Consider things such as: * Lever handles on all doors
* Easy to reach window sills, power sockets and light switches
* Sufficient space to access storage spaces and wardrobes
* Ensuring flush levels between rooms, at entryways, and shower access
* Ensuring smoke alarms have both visual and audible alerts
* Best practice guidance for accessible kitchen, laundry and bathroom design
* Best practice
 |
| **Commercial and Mixed Use Centre City Zone** | * Section CCZ – P4 Housing Choice

Enable high density, good quality residential development that:* Contributes towards accommodating anticipated growth in the city; and
* Offers a range of housing price, type, size and tenure that is accessible to people of all ages, lifestyles, cultures and abilities.
 | **Amend** | **Amend the first sentence by deleting the word ‘abilities’ and replace it with impairments as the actual intention is to refer to disabled people. Using the term ‘abilities’ to refer to disabled people is regarded as euphemistic by many within the disabled community. It also aids in clarifying matters for builders and developers reading the manual and associated documents as to which group is being referred to in this instance.** | Offers a range of housing price, type, size and tenure that is accessible to people of all ages, lifestyles, cultures and ~~abilities~~ impairments.  |
| **Commercial and Mixed Use Centre City Zone** | Section CCZ – P8: Sense of place Provide for good quality new development and supporting public space that reinforces the City Centre’s identity and unique sense of place at a city scale, including its: * Surrounding topography and harbour setting;
* Rich Māori and tauiwi/non-Māori history;
* Compact, walkable city structure;
* Diversified and vibrant mix of activities;
* Visually prominent buildings and variety of architectural styles; and
* Diversity of accessible, well designed civic and public space.
 | **Support** | **Support, particularly requirement to encourage diversity of accessible, well designed civic and public space as this will enable greater accessibility and mobilisation by everyone, including disabled people.** | Support for this provision to stay as written. |
| **Commercial and Mixed Use Centre City Zone** | * Section CCZ – P11 City outcomes contribution
* Require over and under height, large-scale residential, non-residential and comprehensive development in the City Centre Zone to deliver City Outcomes Contributions as detailed and scored in the [Centres and Mixed Use Design Guide](https://eplan.wellington.govt.nz/proposed/rules/0/228/0/0/0/crossrefhref#Rules/0/331/1/20874/0) guideline G107, including through either:
* Positively contributing to public space provision and the amenity of the site and surrounding area; and/or
* Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or
* Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or
* Incorporating assisted housing into the development; where this is provided, legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or
* Enabling ease of access for people of all ages and mobility.
 | **Amend** | **Amend the last sentence by adding the term disability through adding a forward slash after mobility to also indicate that reference is being made to disabled people as well in this section.** | Enabling ease of access for people of all ages and mobility/disability. |
| **High Density Residential Zone** | * Section HRZ – 03 Healthy, safe and accessible living environments

 * The High Density Residential Zone provides healthy, safe and accessible living environments with attractive and safe streets.
 | **Support** | **Having healthy, safe and accessible living environments are important for disabled people.** | Support for this provision to stay as written. |
| **High Density Residential Zone** | * Section HRZ – P2
* Housing supply and choice Enable a variety of housing typologies with a mix of densities within the zone, including 3-storey attached and detached dwellings, low-rise apartments, and residential buildings of up to 6-storeys in height.
 | **Support** | **Disabled people currently lack housing choices due to the traditional design of housing not enabling accessibility. Concepts, such as Universal Design, need to be incorporated into the design of all new builds and this can be done with a wide range of housing designs.** | Support for this provision to stay as written. |
|  | * Section HRZ – P3
* Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types, sizes and tenures to cater for people of all ages, lifestyles and abilities.
 | **Amend** | **Amend the first sentence by deleting the word ‘abilities’ and replace it with impairments as the actual intention is to refer to disabled people. Using the term ‘abilities’ to refer to disabled people is regarded as euphemistic by many within the disabled community. It also aids in clarifying matters for builders and developers reading the manual and associated documents as to which group is being referred to in this instance.** | Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types, sizes and tenures to cater for people of all ages, lifestyles and ~~abilities~~ impairments. |
| **High Density Residential Zone** | * Section HRZ – P6
* Multi-unit housing Provide for multi-unit housing where it can be demonstrated that the development:Fulfils the intent of the [Residential Design Guide](https://eplan.wellington.govt.nz/proposed/rules/0/186/0/0/0/crossrefhref#Rules/0/325/1/20877/0);
* Provides a minimum area of private or shared outdoor living space that is sufficient to cater for the needs of future occupants;
* Provides an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development; and
* Is adequately serviced by three waters infrastructure or can address any constraints on the site
 | **Support** | **Support due to disabled people needing to be accommodated in all types of housing, including in multi-unit housing which will only grow in number as housing intensification increases. It is particularly important to have universal design incorporated into multi-unit builds to accommodate the needs of disabled people who may live there in the future and with an increasingly ageing population, more people will acquire impairments which will raise the number of disabled people within the population even further.** | Support for provision to stay as written. |
| **High Density Residential Zone** | * Section HRZ – P13 City Outcomes Contribution
* Require over height, large-scale residential development in the High Density Residential Zone to deliver City Outcomes Contributions as detailed and scored in the [Residential Design Guide](https://eplan.wellington.govt.nz/proposed/rules/0/186/0/0/0/crossrefhref#Rules/0/325/1/20877/0), including through either:
* Positively contributing to public space provision and the amenity of the site and surrounding area; and/or
* Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or
* Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or
* Incorporating assisted housing into the development, and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or
* Enabling ease of access for people of all ages and mobility.
 | **Support** | **Support the widest possible application of the City Outcomes Contribution through the Environmental and Accessibility Performance Fund established by the WCC in order to incentivise the building of housing and public buildings to Universal Design standards.** | Support for provision to stay as written. |
| **Medium Density Residential Zone** | * Section MRZ – P2: Housing supply and choice
* Enable a variety of housing typologies with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments.
 | **Support** | **Disabled people currently lack housing choices due to the traditional design of housing not enabling accessibility. Concepts, such as Universal Design, need to be incorporated into the design of all new builds and this can be done with a wide range of housing designs.** | Support for provision to stay as written. |
| **Medium Density Residential Zone** | * Section MRZ – P3: Housing needs

 * Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types, sizes and tenures to cater for people of all ages, lifestyles and abilities.
 | **Amend** | **Amend the first sentence by deleting the word ‘abilities’ and replace it with impairments as the intention is to refer to disabled people. Using the term ‘abilities’ to refer to disabled people is regarded as euphemistic by many within the disabled community. It also makes it clear for builders and developers reading the manual and associated documents as to which group is being referred to in this instance.** | Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types, sizes and tenures to cater for people of all ages, lifestyles and ~~abilities~~ Impairments. |
| **Medium Density Residential Zone** | * Section HRZ – P6 Multi-unit housing
* Provide for multi-unit housing where it can be demonstrated that the development:
* Fulfils the intent of the [Residential Design Guide](https://eplan.wellington.govt.nz/proposed/rules/0/182/0/0/0/crossrefhref#Rules/0/325/1/20877/0);
* Provides a minimum area of private or shared outdoor living space that is sufficient to cater for the needs of future occupants;
* Provides an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development; and
* Is adequately serviced by three waters infrastructure or can address any constraints on the site.
 | **Support** | **Support due to disabled people needing to be accommodated in all types of housing, including in multi-unit housing which will only grow in number as housing intensification increases. It is particularly important to have universal design incorporated into multi-unit builds to accommodate the needs of disabled people who may live there in the future and with an increasingly ageing population, more people will acquire impairments which will raise the number of disabled people within the population even further.** | Support for provision to stay as written. |
| **High Density Residential Zone** | * Section HRZ – P13: City Outcomes ContributionRequire over height, large-scale residential development in the High Density Residential Zone to deliver City Outcomes Contributions as detailed and scored in the [Residential Design Guide](https://eplan.wellington.govt.nz/proposed/rules/0/186/0/0/0/crossrefhref#Rules/0/325/1/20877/0), including through either:
* Positively contributing to public space provision and the amenity of the site and surrounding area; and/or
* Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or
* Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or
* Incorporating assisted housing into the development, and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or
* Enabling ease of access for people of all ages and mobility.
 | **Support** | **Support the widest possible application of the City Outcomes Contribution through the Environmental and Accessibility Performance Fund established by the WCC in order to incentivise the building of housing and public buildings to Universal Design standards.** | Support for provision to stay as written. |
| **Energy, Infrastructure and Transport/Transport** | Section TR – S3: Where short stay cycling and micromobility parking spaces are required to be provided by [TR-S2](https://eplan.wellington.govt.nz/proposed/rules/0/206/0/7795/0/crossrefhref#Rules/0/206/1/7755/0) they must meet the following minimum specifications:* 1. Stands must be sized and spaced to accommodate cycle dimensions of 1200mm high, 1800mm long and 600mm wide;
	2. Stands must be securely anchored to an immovable object;
	3. Stands must allow the cycling or micromobility device frame and, in the case of cycles, at least one wheel to be secured; and
	4. Cycling and Micromobility parking facilities must be located:
		1. So they are easily accessible for users, within 20m of the primary entrance;
		2. So they do not impede pedestrian thoroughfares including areas used by people whose mobility or vision is restricted;
		3. To be clear of vehicle parking or manoeuvring areas; and
		4. Short stay cycling and micromobility parking facilities must be available during the activity's hours of operation and must not be impeded by any structure, storage of goods, landscape planting or other use; and
1. Where long stay cycling and micromobility parking spaces are required to be provided by [TR-S2](https://eplan.wellington.govt.nz/proposed/rules/0/206/0/7795/0/crossrefhref#Rules/0/206/1/7755/0), they must be located:
	1. In a covered area where access by the general public is excluded, and at least one wheel is able to be secured.

Note: Refer to 'Cycle Parking Planning and Design, Waka Kotahi 2019'.  | **Amend** | **We welcome the specific mention of people with mobility impairments and vision impairments as an at-risk group in terms of safety in micromobility parking spaces as determined in TR-S3(d)(ii).** **However, we want to make two points so that this clause can be strengthened:*** 1. **Anyone traversing within a pedestrian space is at risk of encountering a person using a micromobility vehicle unsafely in any space, and not just people with mobility and vision impairments;**
	2. **For that reason, we call for S3(d)(ii) to be amended to strengthen the clause so that it clearly reads that any allocated micromobility parking spaces cannot impede any pedestrian thoroughfares whatsoever and that the at-risk example groups are extended to cover not only people with mobility and vision impairments but also children and, indeed, any pedestrian. This would encourage Council to better manage and mitigate any risks associated with establishing a micromobility parking area in a more inclusive way.**
 | Amend TR – S3(d)(ii) to read **“**So they do not impede any pedestrian thoroughfares; this will provide enhanced safety for all pedestrians, and this includes for at risk groups in terms of, for example, pedestrians with ~~whose mobility and vision is restricted~~ mobility and vision impairments, and children, etc.  |
| **Energy, Infrastructure and Transport/Transport** | Section TR – S3: General observation has been made by our members that within the micromobility parking section there is no reference to any licensing conditions to operate. We believe that there are requirements but that these are perhaps covered under trading by-laws?  | **Amend** | **There need to be links made to any trading by-laws covering micromobility parking and trading within this by-law.**  | **Amend through creating links to relevant trading by-laws regarding micromobility vehicle trading and hiring.** |