

# WCC Draft District Plan

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## *Friend of Submitters Report*

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Draft Consultation Period November – December 2021

### Executive Summary

Over approximately 6 weeks, the FoS received approximately 90 distinct enquiries from a range of interest groups and individuals. Rates of enquiry were concentrated geographically, with higher levels of engagement from CBD and inner city suburbs, particularly Mt Victoria, Thorndon and Newtown. Rates of enquiry were also skewed towards self-identified mature-aged residents and retirees, with such enquiries including questions about access and engagement with the e-tools, but also requests for assistance to distill reactions to the Draft PDP material into planning terminology. Landowners affected by SNA provisions also contributed significantly to the rate of enquiry.

Key themes from the FoS service which will assist with preparation for the PDP consultation round in mid-2022 are;

- Submitters are keen to engage with Council about the shaping of the city but some are struggling to contend with the volume of material and breadth of issues contemplated by the PDP.
- In the absence of a service centre in the Civic Square, submitters are reliant upon city libraries for access to hard and soft copies of submission documents.
- Some residents reported feeling consultation fatigue given the current political climate, and expressed concern about how instruments such as the RMA (Enabling Housing Supply) Act may inform the development of PDP.
- Submitters are concerned about how their contact details and sentiments in their submissions will be stored and published. Submitters are struggling to reconcile wanting to participate in the process, with their desire for digital privacy and confidentiality in doing so.
- Some submitters were reluctant to engage with the e-tools and expressed distrust in the reliability of the isovist software. Some submitters feel discouraged by the ‘tech gap’.
- A MS-word version of Form 5 would assist many users without PDF-compatible software.
- Clarity is needed about whether ‘unsigned’ digital submissions and emails are acceptable.
- A small but vocal group were vehement in their desire for hard copies of the DDP to be made available at Council and central libraries.

Feedback from those who engaged with the FoS was overwhelmingly positive about the service. Some expressed feeling emboldened at the conclusion of our interaction to formulate their own submissions, while others continued to engage with the FoS throughout the drafting of their feedback. Some phoned to report that they felt unable to engage with the material but seemed to appreciate the opportunity to express these sentiments! Others emailed their submissions directly to the FoS as they found the lodgment process challenging or were not sure they had completed it properly.

Demand for the FoS service varied dramatically throughout the consultation period, however the volume of enquiry was manageable by one staff member. It is envisaged that the FoS service may require additional staffing support during peak periods during the PDP consultation period later this year.

## Brief

I was engaged as the Friend of Submitters for the Draft District Plan in October 2021 by John McSweeney. The brief was to provide customer interface support for users of the isovist tools, which included an online submissions tool and to assist submitters with engaging with the DDP documentation in order to distill meaningful (planning focused) submission points. By definition, the brief for the FoS is relatively dynamic, and has included meeting with individuals and residents' groups; hosting online meetings; and high volumes of email and phone dialogue.

Although there has been some complexity with organizing face-to-face meetings due to pandemic restrictions, this was highly navigable through remote meetings and email. In person meetings were also available on request, and mature-age submitters in particular appreciated this service, subject to social distancing and mask wearing conventions.

The FoS role undoubtedly includes a customer service element, however there was also a nuanced opportunity to assist with planning terminology, weeding out extraneous themes such as property values, and encourage submitters to root their responses in specific themes and chapters of the PDP text. Most users of the service were clear that the FoS role did not extend to writing a submission on behalf of residents, but some appreciated some focusing questions and suggestions for 'getting started', or in closing off their submissions and lodging them with Council.

## Consultation

### Early Days

#### Wild Cards

Initial contact took the form of emails and phone calls, some of which needed to be directed to other parts of Council. Although anticipated, such contact was a pressure point as it required some triage and redirection to other departments within Council. Examples of wildcard calls included above-ground powerlines, ongoing enforcement / monitoring of active resource consents, and questions about verandah safety. It is likely that in the PDP consultation round, the FoS will continue to field enquiries outside the scope of the brief, which will require some redirection. The customer service team may require some additional direction about the scope of the FoS role.

#### Active community groups

The Thorndon and Mt Victoria Residents Associations made contact very early in the consultation period, and were keen to understand how the FoS could assist their members. Community groups with existing social media infrastructure also made contact to introduce their groups and interests, such as the 'Republic of Holloway Road' Residents Group. Individuals from within these networks formed a significant portion of the overall number of enquiries to the FoS .

#### SNAs

Through their own networks, many landowners affected by the SNA provisions were highly engaged and keen to explore how the FoS could assist. In such instances, I guided the enquiry back to the citation for the SNA precinct, and encouraged the submitter to focus their submission on how their 'on the ground' conditions differed from the written citation or mapping of the SNA, and away from extraneous avenues such as property values, rates relief and government overreach. There was a strong theme running through the SNA enquiries; many felt aggrieved that additional restrictions were imposed upon their properties, perceived that their opportunities to develop their land were curtailed, their stewardship of

native bush was being abused, and in some instances alleged that the SNA classification process was flawed and/or unlawful.

### Roadshows

There was a spike in enquiries during the ‘roadshow’ campaign to engage with residents of the City, both as a result of attendance at the roadshow and through the networks of attendees. The QR code questions were requested by multiple people to be used as a framing document for the basis of submissions which captured the overarching themes of development within the city. Submitters regularly identified the published information sheets and videos as being helpful sources of information.

### Final Days

Towards the conclusion of the submission period, the rate of enquiry from ‘mum and dad’ developers, landowners, business owners and residents increased exponentially. Many felt they hadn’t had time to engage with the DP documentation, ‘didn’t know where to start’, were discouraged by the two-factor authentication process to create a login through the Isovist framework and were looking for a ‘shortcut’ to quickly express their thoughts. As discussed elsewhere, the isovist tool and maps experienced intermittent faults which contributed to the sense of despondency and may account for the reduced uptake in use of the isovist tool compared to overall submissions.

### Extension of time

Many residents were very grateful for the ‘grace period’ extension of time at the conclusion of the consultation period. It is likely that some groups will make use of s37 at the end of the submission period in the next round of consultation.

### Themes/Trends

Approximately 90 distinct enquiries were received during the consultation period, shared between groups/organisations and individuals. Some of the organisations have been mentioned earlier in this report, others included the WCC Environmental Reference Group, National Council of Women (Wellington Branch), Glenside Residents Association, and the Ōtari-Wilton’s Bush Trust. Others did not disclose the group they were calling on behalf of. Individual enquiries accounted for approximately 70% of the total, and tended to be geographically clustered together, concentrated in the inner city suburbs such as Mt Victoria and Newtown.

The Draft Wellington District Plan Public Consultation Summary Report, February 2022 captures the wide range of submission points received over the consultation period. Broadly, these themes were echoed in the enquiries to the FoS service. Residential zoning and corresponding height controls, the application of SNAs, and site-specific concerns comprised the majority of enquiries. Natural hazards, tangata whenua and design guides were only very occasionally mentioned to the FoS.

The enquiries ranged widely in the degree of support they were requesting from the FoS. At the simplest end of the spectrum were quick phone calls about completion of the Form 5 submission, clarifying the role of the draft round of consultation etc. More involved enquiring for example about a particular parcel of land might involve some back and forward about the zone and overlay provisions and their implications on the landowners’ interests. At the upper end, some residents requested a meeting to discuss their concerns, to workshop potential submission points, obtain assistance ‘translating’ their ideas into planning ‘language’. Some requested feedback on draft submissions, and checked in with the FoS for clarity around interpretation, process and terminology.

Approximately 60% of enquiries included a ‘tech support’ element, either centred around the isovist tool, requesting an alternative to the two-factor login requirement and PDF forms, or citing concerns about digital privacy.

There were some enquiries that fell outside the FoS scope. In particular, some landowners affected by SNA provisions requested a site visit and wanted to enter into a dialogue about the species of trees on their site and the merits of the SNA. Others wished to explore their negative experiences with the Resource Consents process, with a view to making a submission which enabled either greater certainty to applicants or greater protections to neighbours of developments. In the main, these sentiments related more broadly to the RMA framework than the DDP.

## Lessons

This section summarises challenges experienced by submitters, and where appropriate, forecasts how the FoS will continue to assist and/or makes suggestions about how the customer experience may be enhanced. It is appreciated that the below suggestions warrant further consideration in terms of resourcing and practicalities and may require further refinement.

### Libraries and Library Heroes

There is a significant cohort of would-be submitters reported being unable to access and/or navigate the e-tools from their homes. Others expressed concern on behalf of residents of the city experiencing economic disadvantage that they were not able to participate in the consultation process.

Some residents expressed a preference for ‘paper copies’ of the Plan, which would work best if used in conjunction with the isovist mapping tool online, so that submitters could use the e-tools to identify the relevant planning controls which relate to a parcel of land online, and then refer to a hard copy of the relevant chapters if desired.

Hosting in-person clinics at central libraries could address this, ideally through the existing library staff and/or established networks such as community support groups. A short introduction to the isovist tool for select library staff and a saved hyperlink on the homescreen publicly available PCs at libraries could assist. Access to the ‘QR code’ links, info sheets and optimally hard copies of the submission form made available *and replenished* at libraries would also assist.

### In-House Heroes and Resources

In some instances, submitters sought a greater degree of ‘expert’ advice about the context or interpretation of specific rules and standards of the DDP which in my view exceeded the FoS ambit, and were best directed to the chapter leads in-house. This was to ensure that the FoS was not inappropriately ‘leading’ submitters or offering assurances about how a particular provision might be interpreted. In some instances, my suggestion was that concerns about ambiguity of interpretation be framed as a submission point. It is envisaged that a small overall proportion of FoS enquiries will require some input from the in-house staff. It would be helpful to have a key contact in the team who could assist with triage of such enquiries. I encourage in-house staff to ‘cc’ or ‘bcc’ the FoS as appropriate into comms and direct email responses where there might be an opportunity for information to be shared more widely amongst submitters with similar questions.

### Privacy/Redactions

A significant number of submitters expressed reluctance in participating in the submissions process due to concerns about how their submissions would be stored and published. Their feared their submissions coming up if their names were ‘googled’, or feared recriminations from their communities for expressing disparate views, citing particularly the sensitivity around residential density and SNAs.

### RMA requirements vs ‘name and shame’

The Act prescribes the contact details for submitters which must be gathered and recorded in the upcoming submissions round. Many submitters were concerned about providing their home addresses and email addresses in particular, and this is likely to be a theme in the next

round of consultation. One interesting suggestion was for Council to manage this through a BCC function which would allow submitters to communicate with one another through Council as an intermediary.

### Isovist / eplan bugs

During periods of heavy use, the Isovist tools were sometimes buggy, failed to load and displayed 404 errors, both on the map tool and the District Plan Chapters. The FoS experienced this during the final week before the close of submissions, in particular one morning which was especially wet and rainy, and I received multiple calls and emails from submitters who were unable to access the software, which is why I am suggesting it was related to peak use. Ideally a contact point at Isovist would be available to Council/the FoS to report these faults to, and to provide tech support if warranted.

### PDF signature vs MS word version

Many users struggled to populate the PDF submission document, due to a lack of software, or were not confident using the PDF writer function. The requirement for a signature on the PDF submission was also problematic for some submitters, and two Residents Associations contacted me asking if a signature was 'really' required in order for a submission to be valid. It is suggested that an MS word version of the submission form be made available, and that the submission form clarify what forms of a signature are acceptable – do submitters need to print the form and sign etc.

### Resistance to using two-factor login

It is envisaged that many submitters will continue to express resistance to using the login function and creating an ID to make a submission online. While two-factor authentication is used widely, this seems to be a stumbling block for some users less familiar with this technology. The FoS will continue to encourage submitters to use this software, at times guiding submitters through the process over the phone, and bridging 'tech-gaps' where possible. It is likely that some users will continue to make use of 'hard copy' or electronic submission forms.

Some submitters asked about whether a 'write in' function was available on the mapping tool, where parcels of land could be highlighted and annotated, in a manner available in the PDP chapters. The FoS is not aware of such a function existing in the current version of isovist.

### Acknowledgement of submissions

It suggested that all submissions receive an auto-response confirming they have been received by Council and will be receipted in due course. It is understood that this function was enabled towards the end of the submissions period, however a number of submitters contacted the FoS service to confirm their submission had been received, and/or forwarded their submissions directly to the FoS email requesting I lodge their submissions on their behalf.

### Closing

I am excited to be involved with the PDP round of consultation later this year. The FoS service offers an opportunity to bridge technical gaps and to invite a wide range of residents to participate in the process. The refinements suggested above are rooted in improving the user experience and encouraging the development of good-quality submissions.

## Appendix: Raw phone data

The attached table records phone conversations not captured by the WCC server. It can be read in isolation to gain a snapshot of the nature of enquiries throughout the consultation period. It is suggested that personal details be redacted if shared outside the organization.

[Link to raw phone data spreadsheet](#)

[Link 2](#)

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