

**BEFORE THE HEARING PANEL APPOINTED TO HEAR AND MAKE DECISIONS ON SUBMISSIONS
AND FURTHER SUBMISSIONS ON THE PROPOSED WELLINGTON DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991 (the
Act)

AND

IN THE MATTER of Hearing of Submissions and Further
Submissions on the Proposed Wellington
District Plan under Schedule 1 of the Act

**SUBMITTER STATEMENT ON BEHALF OF GREATER WELLINGTON REGIONAL
COUNCIL – HEARING STREAM 6**

13 FEBRUARY 2024

SUBMITTER STATEMENT ON BEHALF OF GREATER WELLINGTON REGIONAL COUNCIL FOR HEARING STREAM 6 ON DEVELOPMENT AREAS

1. This Hearing Statement has been prepared on behalf of Greater Wellington Regional Council (Greater Wellington) and represents Greater Wellington's views. It is not expert evidence. Officers will be attending the hearing to speak to Greater Wellington's submission and this Hearing Statement.
2. This hearing statement focuses on the Future Urban Zone and Development Areas. It responds to the officer recommendation to delete the Future Urban Zone, and immediately zone the greenfield development areas to their planned zones.
3. Greater Wellington is neutral about the recommendation to delete the Future Urban Zone and immediately upzone/rezone the development areas through the Proposed District Plan (PDP) hearings process, provided that the district-wide rules apply. We support the collaborative master-planning approach undertaken to inform the development areas, and the signalling of minimal plans for development in other future greenfield areas in the Section 42A reports.
4. However, we wish to highlight a few areas of caution which we will discuss in turn:
 - The need for effective implementation of hydraulic neutrality, hydrological control, and best practice stormwater and earthworks management, to mitigate downstream effects on the Porirua Stream, the Stebbings and Seton Nossiter flood detention dams, and Te Awarua o Porirua.
 - The need for the developments to meet the requirements of the Natural Resources Plan and Proposed Change 1 to the Natural Resources Plan, notified in October 2023.
 - The ongoing need to integrate with transport planning to ensure the best outcomes for uptake of public and active transport, noting the likely increases in demand for existing public transport services that these

developments are likely to cause.

5. In summary, Greater Wellington's neutrality regarding the zoning of these greenfield sites is contingent on the rules in relevant district-wide chapters of the PDP being effectively implemented. We would generally prefer to see development concentrated in places already well serviced by walking, cycling and public transport networks and with easy access to services and amenities.

Background

6. Greater Wellington made several submission points on the Future Urban Zone and Development Areas [351.293, 351.294, 351.295, 351.296, 351.315, 351.316, 351.317, 351.318].
7. Greater Wellington's submission [351.317], on the development areas questioned the need for further greenfield development at this stage, given:
 - the scale of intensification provided for within the existing urban footprint,
 - whether the proposed greenfield development areas can provide for well-functioning urban environments, including access to frequent and reliable public and active transport and
 - the potential externalities of greenfield development, particularly for freshwater, and whether they can be appropriately mitigated while still providing appropriate amenities and density.

Support for masterplanning approach

8. Greater Wellington agrees with the justification for the deletion of the Future Urban Zone. We support the collaborative master-planning process that WCC has undertaken to mitigate potential externalities of greenfield development, in particular with Upper Stebbings and Glenside West which Greater Wellington has recently been involved with. This is consistent with RPS direction on greenfield development. The reporting officers' recommendation to delete the Future Urban Zone signals minimal interest in other future

greenfield development in Wellington city, which Greater Wellington supports.

9. We maintain our submission questioning the need for greenfield development given the scale of intensification capacity that can be enabled in existing urban areas. However, we recognise that efforts have been taken to identify, plan, sequence and integrate these developments over several years, and to respond to onsite characteristics and features in the design of the developments. Greater Wellington also acknowledges the comprehensive analysis undertaken by the reporting officer for these topics, including regarding freshwater protection and alignment with Proposed RPS Change 1 Objective 22.
10. Greater Wellington supports the clear direction provided by the Development Area provisions for compact urban form and the provision of a mix of housing, including higher density attached housing in response to local demand¹. The provision of a local centre in Lincolnshire Farms, including industrial land, is strongly supported. Industrial land has been identified as a shortfall through the Future Development Strategy². The creation of a local centre is likely to reduce travel distances and contribute positively to the wider urban area.

Managing potential adverse downstream effects

11. In discussing the environmental externalities of greenfield development, the reporting officer for these topics concludes that environmental protection is adequately provided for across the WCC Proposed District Plan. We agree that in conjunction with controls in the Natural Resources Plan (NRP), direction in the PDP could go a long way if implemented effectively. However, given that the immediate zoning of these sites as proposed is likely to bring the pace and timing of development forward, Greater Wellington wishes to emphasise the particular need for best practice stormwater management in the development of Upper Stebbings, Glenside West and Lincolnshire Farms, and the importance of hydraulic neutrality and hydrological control at these sites. It is critically important that the impacts of increased imperviousness and generation of contaminants

¹ Section 42A report for WCC PDP Hearing Stream 6 - Future Urban Zones, paragraph xx

² Draft Future Development Strategy, page 44, <https://wrlc.org.nz/wp-content/uploads/2023/10/DRAFT-Future-Development-STRATEGY-September-2023.pdf>

are carefully mitigated as these sites are developed.

12. Greater Wellington's neutrality on the zoning of the development areas is therefore contingent on the rules in district-wide chapters of the PDP applying to the development areas as relevant, and that the hydraulic neutrality and water sensitive urban design requirements are retained and effectively implemented. This also includes the natural hazard chapter provisions which apply a risk-based approach. We therefore agree with the Future Urban Zones reporting officer (paragraph 93) that the statement in the Development Areas' introductions saying they prevail over underlying zoning or district-wide provisions, is not appropriate. While outside of our original submission, we support the deletion of this statement from both chapters.
13. As outlined in our submission, WCC Councillors and officers participated in the Te Awarua-o-Porirua Whaitua process, which led to a Whaitua Implementation Programme and Ngāti Toa Rangatira statement, and Te Whaitua Te Whanganui-a-Tara process, which led to a Whaitua Implementation Programme and Te Mahere Wai o Te Kāhui Taiao. The greenfield development areas are within the boundary of Te Awarua-o-Porirua whaitua, and WCC therefore has a responsibility in implementing the Whaitua Implementation Programme and Ngāti Toa Rangatira statement.
14. Increased impervious surfaces and earthworks at the development sites could cause increased stormwater volume and velocities into the Porirua Stream, which may exacerbate downstream flood and erosion risks as well as sedimentation issues in Te Awarua-o-Porirua. To appropriately mitigate impacts on Te Awarua-o-Porirua and Porirua Stream, the existing direction in the PDP which works to protect freshwater are essential, and must apply to the development areas.
15. Greater Wellington's original submission (submission points 351.324 and 351.325) also raised the potential impact of upstream development on the capacity and levels of service of the Stebbings Valley and Seton Nossiter flood detention dams. Unless stormwater is managed carefully, increases in impervious surfaces upstream of the dams may increase runoff volumes and velocities into the dams, which could affect their operation. We also wish to raise a particular point that stormwater detention methods can have potentially

cascading downstream effects if they were to be breached, with potential release of significant stormwater volumes. This is of particular concern to us given the location of the flood detention dams.

16. Given this context, Greater Wellington is strongly supportive of the recognition of Te Mana o Te Wai and requirements for hydraulic neutrality and water sensitive urban design in the Three Waters chapters and design guides, to assist with managing potential adverse downstream effects on the flood detention dams, Porirua Stream and Te Awarua-o-Porirua. We attended Hearing Stream 5 to express our support for the Three Waters chapter, in particular its integrated approach, consideration of downstream effects, and implementation of direction from the Whaitua processes³.
17. Finally, we also wish to note that greenfield developments that have occurred in the vicinity of these sites have, in the past, led to significant stream reclamation. Stream reclamation requires resource consent under the NRP with policies seeking to avoid reclamation. We support WCC in considering the locations of streams to inform the zoning of these development areas to avoid further reclamation going forward.

Plan Change 1 to the Natural Resources Plan

18. Plan Change 1 to the Natural Resources Plan (PC1) was notified in October 2023. It implements the National Policy Statement on Freshwater Management 2020 for Te Whanganui-a-Tara and Te Awarua-o-Porirua. Zoning these areas to urban at this stage is not inconsistent with PC1 because Maps 86-89 identify them as part of the planned urban extent.
19. In addition to the existing rules within the NRP there are new and amended rules in PC1 that will relate to these developments which sit alongside rules in the WCC PDP. Future greenfield developments will need to meet the stormwater and earthworks requirements in PC1, which seeks to minimise the generation of contaminants arising from urban development and sits within a limits framework. The design of these developments may be affected by PC1 going forward.

³ Expert evidence of R Shield for WCC PDP Hearing Stream 5, page

The need for ongoing transport integration

20. The location of these development areas are generally not optimally located for existing public transport options, which is why we maintain our submission indicating a preference for enabling development capacity in places where there is better access to public transport links and the proximity of services and amenities better enables active modes of transport. We support the greater recognition of walking, cycling and public transport recommended for Lincolnshire Farms, and the general intent of the WCC PDP to adopt a sustainable transport hierarchy. However, given the distance of the areas from existing services and amenities including rail, schools, health facilities and shops, it is likely that future residents will rely primarily on private vehicles to travel.
21. SA2 mode share data for Churton Park and Woodridge indicates that around 60-70% of trips to work are by car, with bus trips representing 20-25%, active trips around 2%, and minimal use of train services. We aren't convinced that, given this existing commuter mode share in the surrounding area, the mode share of future residents of these development areas will be considerably different.
22. Greater Wellington also wishes to highlight that bringing these developments forward through immediate live-zoning is likely to have implications on the capacity, frequency and servicing of existing bus services, particularly for Lincolnshire Farms where considerable development is expected. Given the expected density and scale of development, short-medium term impacts on demand for existing bus, school bus and possibly train links may be considerable. Timely provision of walking and cycling connections to existing bus stops is therefore crucial to reduce private vehicle trips.
23. We support the references to catering for potential future public transport services in the way that roads are designed, as well as reference to the need to involve us in discussions regarding bus services (e.g. DEV2-APP-R6). Given the topography of these areas, the integration of public transport into development design is particularly crucial. Bus services are delivered in response to demand and viability across the whole network, and are not guaranteed. There is a need for sustained planning for public and active transport, and provision of accessible services and amenities to support mode share. We look forward to

working collaboratively with WCC on this going forward.

24. We also wish to emphasise that any potential future public transport accessibility is likely to be focussed on access to the central city from these sites. Future public transport access to other centres such as Porirua and Hutt valley may be limited. We note that there is interest in a potential future Grenada to Petone Link, and the potential for how these developments may integrate with this requires further discussion.