

FDS ID	First Name	Last name	Organisation Name	Page Number
Late Submissions to be accepted				
MAN026	Graeme	McCarrison	Spark	2
MAN027	Leah	Murphy		5
MAN028	Angela	McCleod		8
MAN029	Corrina	Tessendorf	M & J Walsh Partnership Ltd	11
MAN030	Stu	Horswell	Electra	14
MAN031	Chloe	Sparks	Wellington Electricity	18
MAN032	Jason	Durry	Silverstream Railway Inc	25

Parvati Rotherham

From: Parvati Rotherham
Sent: Friday, 10 November 2023 9:05 am
To: futuredevelopmentstrategy
Subject: FW: Future Development Strategy now open for Consultation - Spark and Telco's

From: Graeme McCarrison <[REDACTED]>
Sent: Friday, November 10, 2023 8:31 AM
To: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Subject: RE: Future Development Strategy now open for Consultation - Spark and Telco's

Mōrena Parvati

I just realised I missed the date for putting in a supporting submission on behalf of Spark, Chorus, One NZ, FortySouth and Connexa for the draft Future Development Strategy. My mistake for mixing up the dates and basically just too many competing dates for submissions and evidence. Just wanted to say the following (which would have been our submission points) :

1. Massive thankyou for the opportunities to workshop and provide early feedback and information.
2. The Greater Wellington Future Development Strategy reflects the importance of telecommunications for the greater Wellington region.
3. Nice to see telecommunications part of the definition of significant infrastructure.
4. The Telecommunications sub-section is really useful.
5. Recognition of place of telecommunications to support the priority areas.
6. Recognition that reviews of District Plans are required as part of the implementation of the Future Development Strategy in collaboration with telecommunications providers. Greater Wellington is first FDS to make this statement and recognition the value of collaboration. I personally have been working in this industry for now nearly 12 years this is a first. I and the first value collaboration during the early development of plans as essential to good Plan making and saves so much time.
7. The only missing point is about recognition of interdependencies especially power supply and telecommunications. Greater Christchurch added, after our engagement/workshop/submission, into their FDS the following: *Recognising interdependencies in the infrastructure sector, especially between telecommunications and electricity, and acknowledging the role they play in responding to, and recovering from, natural hazard events.* The importance of this direction in the FDS is that as we develop and redevelopment areas and put in new and upgraded infrastructure it is important to think how we build resilience.

I look to continuing to work with you and the Greater Wellington FDS team. I hope the submissions have been positive and constructive.

Ngā mihi
Graeme



Graeme McCarrison
Planning & Engagement Manager
Technology
Spark New Zealand Trading Limited

T +64 9 357 2807

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From: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Sent: Friday, October 13, 2023 1:00 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Cc: Kim Kelly <Kim.Kelly@gw.govt.nz>; Freda Wells <Freda.Wells@gw.govt.nz>
Subject: Future Development Strategy now open for Consultation

Kia ora all,

This week we started consultation on the Future Development Strategy and we're reaching out to the development and infrastructure community we talked to earlier in the year to make you're aware of this. Everything you need to know is online here: <https://wrlc.org.nz/future-development-strategy>.

We'd welcome a submission from you or your organisation about the strategy and if you'd like to know more or ask questions next week we are holding 2 public webinars that you're welcome to join. Information about signing up for these is here:

- Tuesday 17th October - <https://wrlc.org.nz/future-development-strategy-overview-webinar> (more relevant if you're a newbie)
- Thursday 19th October - <https://wrlc.org.nz/future-development-strategy-dive-into-details-webinar> (more relevant if you know what an FDS is and concepts about planning)

Alongside the strategy we will prepare an implementation plan which is currently being pulled together, feel free to add feedback in the survey about your ideas for implementing this strategy. We will be testing the implementation plan with the development and infrastructure providers community early in 2024, keep an eye out for an invite to this later in the year.

If you have any more specific questions, please email future.developmentstrategy@wrlc.org.nz

Thank you,

Parvati

Parvati Rotherham (she/her) | Project Lead – Future Development Strategy
Wellington Regional Leadership Committee
Waea 021 932 057 | www.wrlc.org.nz



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Parvati Rotherham

From: Leah Murphy [REDACTED]
Sent: Friday, 10 November 2023 11:03 am
To: futuredevelopmentstrategy
Subject: Re: Submission on FDS

Thank you. Sorry it was so very basic! I didn't really set aside the time I needed to make it a good one. But just wanted to put in a vote for some important themes!

Leah

Leah Murphy (she/her)
Island Bay, Wellington
[REDACTED]

On Fri, Nov 10, 2023 at 7:55 AM futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz> wrote:

Kia ora Leah,

Thanks for your submission this email confirms receipt and we'll review the submission in more detail over the coming week we'll be collating all submissions into a publicly available report by the end of this month and will keep you posted.

Thanks

Parvati

From: Leah Murphy [REDACTED]
Sent: Thursday, November 9, 2023 11:56 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Submission on FDS

Hello

I'd like to put in a submission on the FDS.

I am submitting as myself

Overall note: as there is no option for “support and want it to go harder” or “do not support because it’s not strong enough”, I have been forced to tick “support” throughout.

Q1: vision and strategic direction

I support the vision and strategic direction but especially the Mana Whenua statement of values and aspirations because it’s a very basic start. The direction should have prioritised or weighted objectives, particularly equity and emissions reduction, so it was able to start a paradigm shift in how we manage urban development.

Q2: Our plan for where we develop housing...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply a string threshold for considering any free fiends development with a focus on minimising new infrastructure and enabling communities to reduce emissions. Also there should be a focus on green/good intensification near trans sport nodes ahead of greenfields.

Q3: no comment

Q4: key infrastructure...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply a prioritisation for infrastructure needed intensification.

All this assessment should be done by a highly qualified and independent third party, such as a region-wide experts’ group accountable to the infrastructure Commission or some other non-council body.

Q5: limit or avoid development...

I do not support this proposal as it seems unlikely that public subsidy will be withdrawn for slated greenfield areas. If it were to be, I would support this proposal.

Q6: iwi and hapu values and aspirations

I support these and the FDS would do well to take on their ambition.

Q7: what else is important:

Providing for waking and cycling as much as possible!

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Parvati Rotherham

From: Angela McLeod [REDACTED]
Sent: Friday, 10 November 2023 3:38 pm
To: futuredevelopmentstrategy
Subject: Re: Feedback thwarted

Ok, I was filling out the survey.

Re Housing: Support. Comment: some emphasis on equity of access to food should be included in housing developments when planning them.

Re Business areas: Support. Comment: some support for food production, distribution and retail as viable businesses, with things such as preference for local food businesses in the mix of available premises/properties.

Support the submission of RKN Advocacy Group and their final comments.

Would like to speak to my submission.

Ngā mihi

Angela

Angela McLeod
Community Leader
[REDACTED]

Possibly sent outside of your normal working hours (please only reply within yours) and from a small device - apologies in advance for any typos (even though the tiny keyboard is QWERTY)

[Outlook for Android](#)

From: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Sent: Friday, November 10, 2023 1:12:12 PM
To: Angela McLeod [REDACTED]
Subject: RE: Feedback thwarted

Ahh I see this one must not have worked sorry – please feel free to email back your feedback today and we'll count it.

Thanks

Parvati

From: Angela McLeod [REDACTED]
Sent: Friday, November 10, 2023 1:11 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Re: Feedback thwarted

Thank you,

I have a submission for the Regional Kai Network and from me personally. It's the second one that I couldn't complete.

Ngā mihi

Angela

Angela McLeod
Community Leader

Possibly sent outside of your normal working hours (please only reply within yours) and from a small device - apologies in advance for any typos (even though the tiny keyboard is QWERTY)

[Outlook for Android](#)

From: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>

Sent: Friday, November 10, 2023 12:56:11 PM

To: Angela McLeod [REDACTED]

Subject: RE: Feedback thwarted

Kia ora Angela,

Thanks for your submission. It looks like it must have worked I can see an entry from you. I can send you your response on Monday once its been individually extracted so you can check its all there.

Have a great weekend.

Parvati

From: Angela McLeod [REDACTED]

Sent: Thursday, November 9, 2023 5:17 PM

To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>

Subject: Feedback thwarted

Dear team,

I had nearly finished my personal submission when it stopped working. Granted it was a little after 5, however, it would be nice to have the chance to see if what I had completed was submitted.

Many thanks in advance.

Ngā mihi mahana

Angela

Angela McLeod
Community Advocate, Champion, Supporter | Upper Hutt
C: [REDACTED] | [Website](#)

Follow me on [Facebook](#) | [Instagram](#) | [Twitter](#) | [LinkedIn](#)

I support flexible working. It suits me to send this email out of typical office hours - however in supporting flexible working I do not expect you to reply outside your regular work hours.

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**SUBMISSION / FEEDBACK ON THE FUTURE DEVELOPMENT STRATEGY
WELLINGTON REGIONAL LEADERSHIP COMMITTEE**

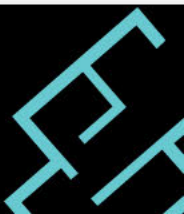
To: Wellington Regional Leadership Committee.
By email to: future.developmentstrategy@wrlc.org.nz

Submission on: Wairarapa-Wellington-Horowhenua Future Development Strategy

Name of Submitter: Urban Edge Planning Ltd
on behalf of M & J Walsh Partnership Ltd

Address for service: Urban Edge Planning
PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

Attention: Corinna Tessendorf
[REDACTED]
[REDACTED]



Issue

This submission relates to the site at 12 Shaftesbury Grove, Stokes Valley, Lower Hutt. The site is located at the end of Shaftesbury Grove, has an area of approximately 12.5ha and is legally described as Lot 1 DP 507600 CT 7771535.



Figure 1 – Aerial Image and District Plan Map of Plan Change Site (Source: HCC WebMaps)

Background

The site at 12 Shaftesbury Grove is currently zoned partially as Hill Residential Activity Area (approximately 7.6ha) and partially as General Recreation Activity Area (approximately 4.9ha) under the operative Hutt City District Plan.

The site is characterised by a relatively flat ridgeline with steeper hillsides on both sides. It is undeveloped except for a formed but unsealed access track following the ridgeline the entire length of the site and two cell phone towers. The track provides access to the Delaney Reservoir which is located to the south of the site.

Hutt City Council's Urban Growth Strategy identifies the site as part of an area where the feasibility of development should be further investigated. The site was previously owned by Hutt City Council and partially vested as reserve. In 2016 Hutt City Council initiated the reserve revocation process to provide for future residential development of the site. It was then declared surplus to Council's requirements and sold to M & J Walsh Partnership Ltd (the plan change requestor) in December 2017. The material provided with the marketing package included indicative development schemes for up to 180 houses and several technical report, including reports on water supply and other services.

After ongoing consultation with Hutt City Council the owner has recently lodged a private plan change request for the site. The private plan change seeks the rezoning of the site to Medium Density Residential Activity, which would be consistent with the zoning of surrounding residential areas. The private plan change also proposes the introduction of the site specific provisions to address the identified site specific issues and opportunities (where these are not sufficiently addressed by the current provisions in the Operative District Plan).

The private plan change was accepted by Hutt City Council at the Full Council meeting on 30 October 2023 and is expected to be publicly notified on 09 November 2023.



Submission / Feedback

We request that the site at 12 Shaftesbury Grove is recognised and included in the Future Development Strategy as a Future Development Area. This would appropriately reflect the current Hill Residential Zoning of the site and the proposed rezoning to Medium Density Residential with site specific provisions. It would also align with Hutt City's Urban Growth Strategy.

Shaftesbury Grove represents a greenfield development opportunity that is located right adjacent to existing residential development and in reasonably close proximity to the Stokes Valley commercial centre. The main constraint is the insufficient water supply capacity in the catchment to serve additional development in the area.

The site does not contain any class 1, 2 or 3 type soils and therefore is not classified as highly productive land.

While the property is partly affected by an identified SNR (SNR 50 – Stokes Valley Bush) the relevant District Plan rules ceased to apply to SNRs on private land in 2005. The most recent Ecology and Landscape project undertaken by Council from 2016 to 2018 did identify two potential Significant Natural Areas (SNA) on the site that were significantly smaller than the SNR 50 overlay, located over a gully on the western side of the site and along the southwestern boundary of the site. However, in 2018 Hutt City Council decided not to proceed with the plan change and as such no mandatory restrictions on private land or SNAs were introduced into the District Plan.

There are no significant cultural or archaeological sites or heritage buildings and structures identified on the site.

The site is not subject to any natural hazard risks identified by the Operative District Plan (Wellington Fault Overlay, Inundation, Overland Flowpaths, Stream Corridors, Coastal Hazards).

Based on the above we consider that the property at 12 Shaftesbury Grove forms part of the urban environment and should be included in the urban zone as shown on the FDS maps



Corinna Tessendorf
Urban Edge Planning Ltd

On behalf of
M & J Walsh Partnership

Date: 10 November 2023



WELLINGTON

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13 November 2023

Parvati Rotherham
Project Lead
Future Development Strategy
WRLC Secretariat

By e-mail: future.developmentstrategy@wrlc.org.nz

SUBMISSION ON BEHALF OF ELECTRA ON THE PROPOSED FUTURE DEVELOPMENT STRATEGY FOR THE WELLINGTON REGION

Thank you for the opportunity to submit on this document.

Electra, as the electricity distribution company for Horowhenua and Kapiti Coast Districts, understands the critical importance of installing the safest and most efficient electrical infrastructure. Electra undertakes continuous efforts to improve, extend and replace infrastructure, to ensure dependable electricity connections.

Electrical distribution utilities need to be aligned with the region's growth and future development, to this end Electra acknowledges the significance of considering future development pressures and trends. We agree with the need for regional guidance on sustainable growth and development, along with a strategic spatial plan to steer future development.

To ensure that the electrical distribution infrastructure is provided efficiently in harmony with these growth objectives, Electra would like to submit the following comments regarding the Draft Future Development Strategy (FDS).

The wider context of this submission is the national energy transition from fossil fuels to renewable sources (mainly electrical energy) which will require radical changes over time in the quantity of electricity to be distributed and used in the region (increased), the quantity of local renewable generation (likely to increase, both as grid-scale plants and as domestic / business scale generation)

and local transformer and storage facilities (likely to increase). These changes need to be accommodated with the FDS process and subsequent spatial and land use planning processes.

Submission Points:

1. Support for objectives

Electra supports the FDS objectives, in particular:

- Providing for... compact, well-designed towns and cities
- A flourishing zero-emissions region
- We have the infrastructure we need to thrive

2. Request the identification of space for utilities:

Electra endorses the densification of existing urban areas. It is also crucial that the FDS ensures that these denser zones allocate sufficient space for essential infrastructure such as larger substations, battery storage, and vehicle charging to be developed or implemented. This can be signalled in the FDS but would need to be implemented through district plans or other land use planning instruments as well as through district council development engineering policies and approvals.

3. Electra supports the FDS Preference for Limited Greenfield Development:

Electra strongly advocates for concentrating greenfield development (both residential and business) in a few identified locations rather than dispersing it. This approach would be significantly more efficient for service delivery.

4. Electra supports Future Densification and Development Along Corridors:

Electra supports regional development along designated corridors, it would also be desirable to allow for infrastructure corridors where possible, to facilitate efficient provision of electricity infrastructure and other linear infrastructure (particularly transport and telecoms).

5. Focus areas for Renewable Energy Facilities:

Ideally the planning for renewable energy generation and storage facilities could be concentrated in a limited number of suitable areas (identified based on constraints mapping and consultation) rather than dispersing them throughout the region. This more centralised approach should be able to enhance efficiency and reduce the overall service costs and potentially reduce environmental impacts.

6. Promotion of Coordinated Infrastructure Planning:

The FDS should emphasise the importance of providing sufficient electrical infrastructure to facilitate the future development. Electra will therefore encourage and support the future development process where infrastructure planning in the region is coordinated in relation to the development needs. Electra

also recognises the evolving needs of the region and the necessity for a combination of long-term strategic planning and shorter-term decision-making involving various stakeholders. The FDS process (or subsequent regional planning processes) should provide forums for these discussions to occur.

7. Planning for local EV charging and home solar uptake

The FDS should note the increased demand and time of use implications due to increased uptake of EV's and consider how regional planning can respond to that e.g. the promotion of more home working would enable people to charge cars in the daytime with solar generated energy, rather than at night during peak use periods.

Where homeowners are generating electricity, they should be encouraged to use this internally – charge an EV, heat their water or home, or store it in their house battery.

If possible, the FDS could consider how EV charging can be provided for on a regional basis e.g. public charging networks / locations and strengthening of the grid for private charging.

8. Improving Collaboration between Developers, Councils and Electricity Lines Companies

Electra would like councils to communicate with developers to limit the erosion / reduction of footpaths and roadside berm areas in new subdivisions as this is leaving utility providers with very little space to install infrastructure.

Electra would welcome a regional scale review of the issues some councils have introduced by installing Geotech drainage mesh around and under footpaths, which makes it difficult to design a trench profile and install the required infrastructure and leaves no space for future upgrades or additional infrastructure around or through these subdivisions.

Electra would like to see an improved awareness from Regional and District councils of the limitations and costs of underground infrastructure, and why in most cases it would still be a better solution to provide overhead lines. The requirement by some councils to underground all new connections has various issues:

- It is more susceptible to impacts from natural hazards (flooding, tsunami, earthquake)
- When utilities are undergrounded, it increases the timeframes to find and fix problems.
- The costs associated with underground in comparison to overhead lines, underground lines are 10 times greater to install and much harder and more expensive to upgrade.

This cost is ultimately passed to residents.

KiwiRail should be encouraged to take their power supply directly from Transpower rather than connecting to the Electra distribution network.

Conclusion

Electra thanks the Wellington Regional Leadership Committee for their work in this regard and trust that the infrastructure requirements for electricity distribution will receive the required attention to ensure a sustainable future development model.

For further discussions on these points please contact in the first instance:

Stu Horswell

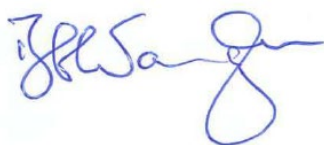
Network Planning Team Leader

Electra

[REDACTED]

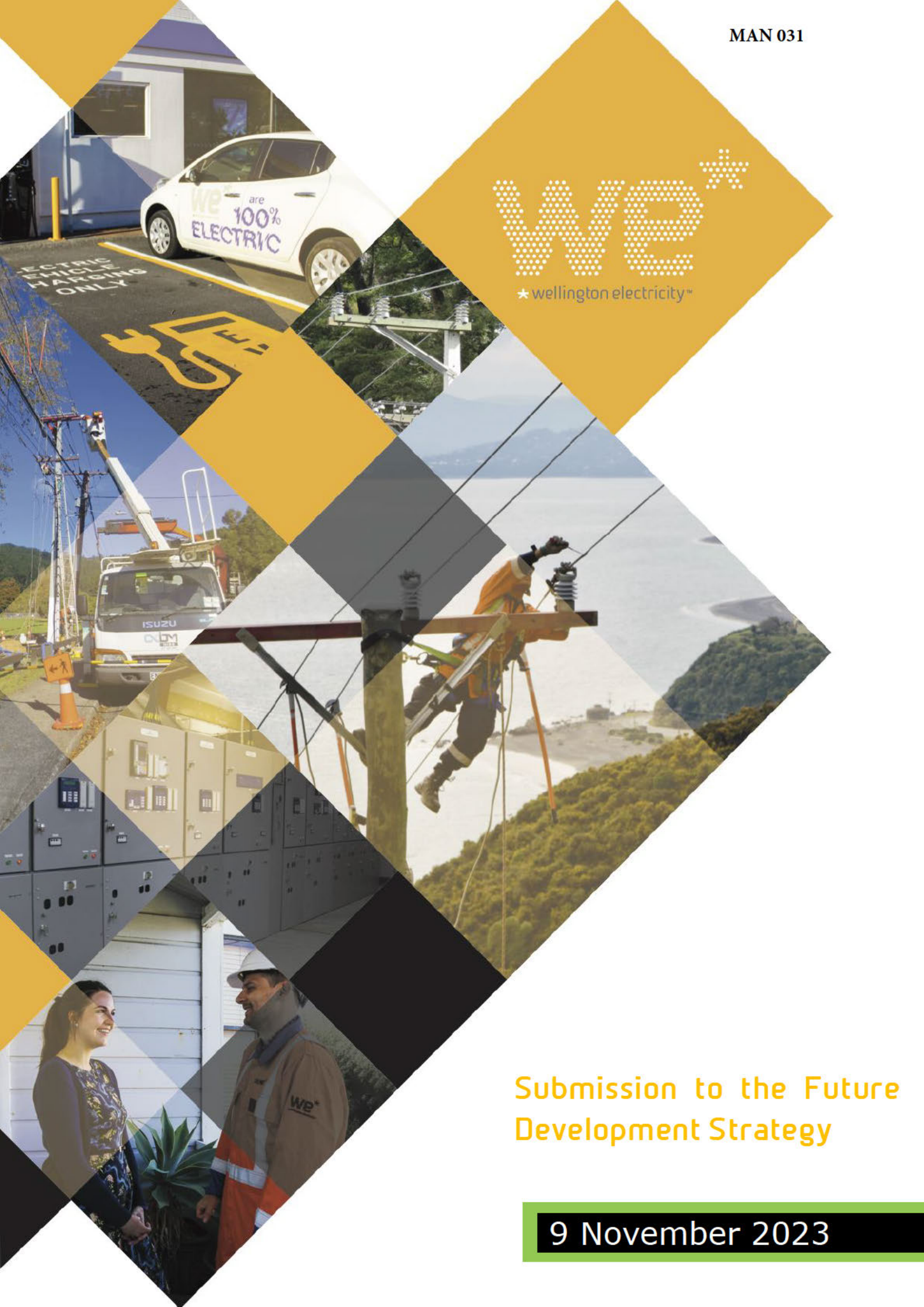
Ph [REDACTED]

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Bernie Warmington', with a stylized flourish at the end.

Bernie Warmington

**Planning Manager – Wellington
Align Limited**



Submission to the Future Development Strategy

9 November 2023

Submission and contact details

Consultation	Future Development Strategy
Submitted to	Wellington Regional Leadership Committee
Submission address	future.developmentstrategy@wrlc.org.nz
Date submitted	9 November 2023
Submitter	Nick Merrington
Contact	Chloe Sparks
Email	[REDACTED]
Phone	[REDACTED]

Release of information

This report contains no confidential information and can be publicly disclosed.

1 Introduction

Wellington Electricity (WELL) would like to thank the Wellington Regional Leadership Committee (WRLC) for the opportunity to provide feedback on the draft Future Development Strategy (FDS) document. The strategy will drive the need for greater collaboration between stakeholders to build resilient infrastructures, support the government's net-zero emissions reduction plans, and create opportunities for the regions people.

WELL is a distribution network that manages the local lines that deliver power to Wellington, the Hutt Valley, and Porirua, powering around 173,000 homes and businesses. After many years of low electricity demand growth, WELL has been operating in a 'business as usual' setting and one of the most cost-effective distribution networks in the country. WELL is forecasting to increase the capacity of our network by greater than 100% to accommodate expected demand growth for electricity over the next 30 years. This is largely due to the uptake of transport electrification, the potential transition of 100MW of commercial gas use to electricity, and population growth.

As a regulated distribution network, WELL must justify the use of consumer funding by building for quality, affordability, and necessity. It is important that distribution networks make strategic decisions

for building the necessary network capacity requirements that will come about because of future developments. An uncoordinated or badly timed plan would result in higher costs for consumers and create resource constraints while there is a rush to electrify. The FDS will help set the pace for networks to build new capacity and how much distribution networks will need to invest.

2 Consultation Questions

2.1 Do you support our vision and strategic direction that guides the draft Future Development Strategy?

WELL supports the general theme and strategic direction through four areas that influence the investment decisions we will need to make in the future as an electricity distributor. The existing network infrastructure will need to increase capacity for more intensified housing; support conversions of carbon emitting activities to electrification; build a resilient network to protect against natural hazards; and support other infrastructure developments that need electricity supply.

Providing for affordable housing that meets our needs, and for compact well-designed towns and cities

WELL is impacted mostly by this objective to intensify housing within existing towns and cities. There are areas on our network that are forecast to exceed their capacity due to the changing framework of energy use. We are developing a strategy for where we may need to upgrade the network and what traditional investment will be impacted through the establishment of Distributed Energy Resources (DER) and flexibility services¹.

As towns become more compact with intensified housing, the future development strategy needs to ensure there is sufficient provision for EV charging, and the infrastructure built is well-timed to manage the uptake. EDBs do not have access to low voltage (LV) data where EV penetration is occurring due to privacy reasons, and this is a challenge for the electricity sector. With consumption data and IP connected devices (participating in flexibility trading/service) like residential EV chargers, we can utilise existing network capacity and maintain fluctuations in voltage and demand that would otherwise mean a larger traditional investment in infrastructure is required. This is closely linked to

¹ Flexibility services are consumers using DER such as solar/battery systems, and time-discretionary demand such as EV charging, to provide a service to the electricity market. This could for example include consumers receiving a payment from the EDB to discharge their battery during peak demand times to help defer the need to invest in upgrading the capacity of the distribution network.

the second strategic area ‘promoting a flourishing zero-carbon region’ where our submission will expand on this.

Promoting a flourishing zero-carbon region

A national energy strategy is being developed around decarbonising the electricity sector as part of MBIE’s ‘Advancing New Zealand’s Energy Transition’ and WELL believes that the electrification implementation of the FDS direction should be guided by the national strategy, rather than trying to intensify regional electricity generation that does not align with the national strategy. The Wellington region has a few areas of generation opportunities but will still require connection to the national grid as this is likely to remain the most cost-effective source of electricity for customers. There needs to be careful analysis of the benefits in increasing regional electricity generation against the costs that this would impose on consumers, compared to having access to the economies of scale provided by the high voltage transmission grid supplying electricity from large generation assets around the country.

The FDS covers the 30 years in which Boston Consulting Group’s ‘The Future is Electric’² predicts there is \$22bn of nationwide distribution investment required to meet electrification demands from the government’s net-zero targets by 2030, \$25bn in the 2030s, and \$24bn in the 2040s. It is essential that WELL can keep pace with electrification and that the regulatory regime allows this to happen. It is promising that the FDS acknowledges that renewable gases may have a potential to decarbonise areas of stationary energy emissions. As Wellington has the highest concentration of residential fossil gas connections in the country, any accelerated exit of gas use may cause price shocks to customers due to assets requiring upgrading sooner than currently forecast. The Gas Transition will underpin much of WELL’s ability to cater for electrification while maintaining a reliable and cost-effective supply to customers.

Over this time, modelling suggests that a household’s electricity bill will remain stable, and their total energy bill will decrease by 10-40% due to reductions in fossil fuel consumption.³ A large driver of household energy cost reductions and emission reductions will be through having access to an electric vehicle. It is important that intensified housing developments provide space and charging infrastructure for EVs so that people can have access to energy bill savings. Energy bill savings also are

² <https://www.bcg.com/publications/2022/climate-change-in-new-zealand>

³ <https://www.poweringup.org.nz/updates/total-household-energy-costs-will-reduce-with-electrification/>

predicted to come from more energy efficiencies and this is another opportunity for the WRLC to encourage energy efficient homes and businesses.

Protecting what we love

We support the FDS's strategic direction to build resilience by avoiding developments in areas that are prone to natural hazards, including areas affected by climate change, and prioritising developments around existing towns and cities.

WELL implores the WRLC to undertake early engagement with utilities such as WELL around decisions relating to climate change adaptation. This is due to the time lag in investment decisions required for electricity distribution, the large cost of those investments, and the risk of stranding assets should any decisions be implemented without adequate warning. For example, areas at significant risk from sea level rise may still require investment into assets to provide capacity and reliability for existing consumers, however those investment decisions can be optimised to minimise the total long-term cost to consumers if there is a clear understanding about the adaptation strategy and timeframes.

2.2 Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

WELL agrees with the proposal to prioritise most housing developments in existing towns and cities ie. brownfields, as this will be less expensive than greenfield development. From a distribution network perspective, it is significantly more cost-effective to use existing infrastructure, with flexibility services maximising the utilisation of the capacity of those existing assets and targeted capacity upgrades where necessary, than to extend the network to provide significant capacity into new areas of development.

We support housing developments around our strategic transport network however, WELL would like to highlight the importance of coordination with the electricity sector to enable this implementation. For example, the electricity network has capacity at off-peak times and could provide electric bus charging without the need to drastically increase network capacity. This can also be matched with the demand profiles of other public transport, such as rail, to balance load. Additionally, it is important that charging hubs are not at the far ends of the network as this would require reinforcing of the whole line to carry the required capacity.

2.3 Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

WELL supports prioritising business development in existing cities for the same reasons as Q2. We also want to highlight one of the areas mentioned for development, Judgeford Flats, is currently rural and will require substantial upgrade of the electrical network in the area to provide the capacity and reliability required to support business growth. Other industrial areas such as Gracefield and Seaview have existing infrastructure that is already suitable for business development.

It is important to have clarity in the funding model for the new projects, especially those in greenfield areas, and to allow for better coordination between utilities during the execution of the projects. As noted in the draft strategy, the Let's Get Wellington Moving Transport Infrastructure Programme will give utilities the opportunity to replace or upgrade underground utilities. Coordination for this kind of work, with adequate lead time to allow for design, funding, and the procurement of materials, will be paramount to its success.

As outlined in our answer to question 2, WELL support the coordinated effort required to achieve this outcome.

2.4 Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

WELL agrees that there are constraints for developing infrastructure and that priorities need to be clearly managed for efficient use of resources. It is less expensive to maintain existing infrastructure than to extend infrastructure into new areas. However, the strategy proposes "speeding up the infrastructure required to enable us to meet our strategic direction" which is a risky approach and could result in poorly timed investments that are very costly, or infrastructure being unprepared.

From a distribution business perspective, WELL is regulated by the Commerce Commission and the Electricity Authority. There are legislative restrictions that can impose additional investment outside of the price path reset and, under the current statutory objectives, can be difficult to justify spending on additional capacity other than what is deemed necessary. This is because existing customers will fund most network investment/reinforcement through tariffs on their electricity bills. If there is additional funding by customer group one, they will be subsidising customer group two's capacity needs that leads to cost reallocation and an inequitable outcome.

As part of our submission for MBIE's Electricity Market Measures papers⁴, we have commented on the possibilities and challenges for the sector in the next few decades with a focus on flexibility services and breaking down barriers for investment into our network. WELL recommends that WRLC use the outcome of the National Energy Strategy to influence expectations on the speed to meet decarbonisation targets as this is a collaboration of energy industry expertise.

2.5 Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

As a Lifeline Utility, WELL supports a need for resilient critical infrastructure and careful consideration for protecting areas prone to natural hazards. It is essential that the FDS considers the relationships between infrastructure, including electricity, transport corridors, telecommunications, and flood protection, rather than each being addressed in isolation. The result should be a coordinated approach to increasing resilience across each of these aspects, combined with measures to increase community and household resilience.

As noted in WELL's 2023 Asset Management Plan (AMP), EVs could increase household resilience, and this should be further motivation for WRLC to support residential EV charging infrastructure in the plan.

2.6 How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

No comment.

2.7 WHAT ELSE IS IMPORTANT TO YOU? Do you have any other feedback on the draft Future Development Strategy?

No comment.

⁴ <https://www.mbie.govt.nz/dmsdocument/26909-measures-for-transition-to-an-expanded-and-highly-renewable-electricity-system-pdf>



Jointly Committed to Saving the Silverstream Spur for Future Generations

Wellington Regional Leadership Committee

Dear Wellington Regional Leadership Committee.

Our group is seeking the inclusion of a late submission (this letter) under Section 37A 1 B of the RMA (or by any other means) as we represent part of the community that enable adequate assessment of the Future Development Strategy as all groups will be effected by other submissions made to the FDS.

Our group is made up of members of the management committees of Forest and Bird Upper Hutt Branch, Save Our Hills Inc, and Silver Stream Railway Inc, who jointly over the previous 2 years (and individually for many years prior) have lobbied to ensure the protection of the Upper Hutt City Council owned Silverstream Spur Reserve from any form of development, with recent efforts focused on opposing the construction of a road/infrastructure corridor to service the Southern Growth Area (SGA) on the spur, a separate piece of reserve land.

All three groups, along with a large number of members of the community all made submissions during the Upper Hutt City Council (UHCC) Plan Change 49 Variation 1 process, supporting the rezoning of the Spur to Natural Open Space, with all but 3 submissions specifically opposing the construction of a transport/infrastructure corridor on the Spur to service the SGA. At the hearing held in front of the independent hearing commissioners held 27-30 November 2023 , the group were disappointed to learn that both Guildford Timber Company (GTC), and Upper Hutt City Council (UHCC) submitted to the FDS seeking to include the SGA in the FDS. This is despite the draft strategy that our groups reviewed, not including the SGA, and the latest HBA figures adopted by UHCC in August showing a sufficiency of housing capacity.

Aside from the other issues relating to the SGA such as storm water runoff, access and lack of supporting infrastructure, and the destruction of indigenous biodiversity, our groups consider that while the decision of accessing the SGA through the Silverstream Spur is still being considered, and has therefore not been decided, then the SGA should NOT be included in the FDS for the Wellington Region. It is also considered, as is stated in the draft strategy, that sufficient capacity exists now that the Intensification Planning Instrument has been adopted by UHCC, and in line with the NPS-UD policies 1 and 3 in particular, the SGA does not meet the threshold for being included in the FDS.

Relief Sought: The joint group of Forest and Bird Upper Hutt Branch, Save our Hills Inc, and Silver Stream Railway Inc, seek that the Southern Growth Area is continued to be excluded from the Wellington Regional Leadership Committee Future Development Strategy and the groups support the parts of the strategy that seek to restrict Greenfields development in the Hutt Valley aside from what was indicated in the draft strategy. The groups submit that the WRLC reject the submissions of the GTC and the supporting submission from the UHCC that seek to include the SGA in the FDS, as

Upper Hutt already has more than sufficient realisable housing capacity to meet short, medium and long term growth in the city and the SGA does not meet the policy's required to warrant inclusion in the FDS. Rejecting of the GTC and UHCC submissions is in keeping with the group's objective of keeping the Silverstream Spur free from any form of development and keeping it as Natural Open Space for future generations to enjoy.

We would appreciate your favourable consideration of this late submission in light of the large amount of community interest in this matter over an extended period of time. If this submission is included we would appreciate the opportunity to appear at the hearing in support of this submission.

Yours Sincerely

A handwritten signature in blue ink, appearing to be 'Jason Durry', written over a faint horizontal line.

Jason Durry
Acting General Manager
Silver Stream Railway Inc
On behalf of Forest and Bird Upper Hutt, Save Our Hills Inc, and Silver Stream Railway Inc.

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Parvati Rotherham

From: Sue Ross [REDACTED]
Sent: Monday, 30 October 2023 11:08 am
To: futuredevelopmentstrategy
Subject: FDS Submission

Attachment available until 29/11/2023

Submitter:

Attention: Dr H C (Campbell) Ross as agent and trustee for the Campbell and Susan Ross Trust

Email: [REDACTED]

Postal address: [REDACTED] Ngarara Rd, Waikanae

Phone: [REDACTED]

I wish to be heard: Yes. Dr Ross as agent and trustee for the Campbell and Susan Ross Trust at Paraparaumu (KCDC, 175 Rimu Road) on Wednesday 13 December

Based on the Kapiti Coast: The Ross couple live at [REDACTED] Ngarara Rd.

Question 1: Do you support our vision and strategic direction that guides the draft Future Development Strategy?

To complete

In general support but see flaws – below.

Note, our major response is attached to Q7.

Question 2: Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

To complete

This and following questions are too compounded and “leading” to be simply answered. Seem more like “promotions” than requests from a regional authority for open feedback.

Question 3: Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

To complete

Multiple question with too many loadings.

Question 4: Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

To complete

Is there any real alternative? Is the question worth asking?

Question 5: Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

To complete

It's so loaded. And answers itself. Like "motherhood": who could object?

Question 6: How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

To complete

That is for Maori to say, surely!

Question 7: What else is important to you? Do you have any other feedback on the draft Future development Strategy?

To complete

NB: Our major response document attached.

[Click to Download](#)

Our Central Submission copy.pdf
23.2 MB

Our Central Submission:

1.

- That the Draft FDS is flawed in that it does not treat Waikanae, with respect to the subdivision of certain peripheral (peri-urban) lands (which we describe below), consistently with the peri-urban areas around those towns in the Wairarapa, Horowhenua, and Otaki, where the FDS will in fact allow “some smaller greenfields on the periphery where they are well-connected with existing environments”.
- The situations are strongly parallel, whichever way one may define a “rural town”, with the beneficial difference that in our case the need is **not** for greenfield Intensive, urban style, subdivision but simply that KCDC be enabled to retain the present “Eco” designation for the area in question and allow conversion (on merits, per normal planning processes) from Eco “Hamlet” to fully self-serviced Eco “Lots”. The present Eco Hamlet rules have proved to be dysfunctional on our land — inefficient in application (per recent example), not making best use of the otherwise unproductive terrain where there is an ongoing demand for building lots of a larger peri-urban kind, protective of the broken and ecologically rich environment.
- A part of the desirability of keeping this distinctive land available for subdivision is to supply for Coastal Retreat (a principal consideration in the FDS). This must be well-advanced long before the 30 year hiatus (until the land in question might otherwise be made available, as announced in the Draft FDS document). Retention of the present designation, in principle, plus early modification, will also assist toward that related FDS Objective, “the region becoming more climate and natural hazard resistant”. There are no downsides to early action.
- Similarly, the present condition of the land (already abandoned from farming — it is none of LUC categories 1, 2 or 3, is under plague-level rabbit degradation, and noxious weed infestation) makes it civically irresponsible to prohibit its inevitable future rural residential use for any longer. Much better things, including proper care under small-lot ownerships, can and should start immediately.

2.

- A closely related concern with the draft FDS in these respects is that while it pays close attention to the quantum of urban sections required over the next 30 years, it does not report equally, or at all, of desirable variety (and therefore choice, as the new National Government may take an interest in) across the matters of space, character, and quality of building lots.
- Very few of those retreating inland, or those wishing to move to Waikanae from elsewhere, will be looking for infill sections in the village (even if present Waikanae dwellers wish to release their often “treasured” garden areas) or for shared multi-level complexes. (Indeed, for those reasons the FDS’s base calculations as to supply for the next thirty years may prove dramatically well short.) A strong proportion of “climate refugees” will be seeking the sorts of properties we proposed.

The case we put (as further detailed below) does provide for those elements of variety, choice, and demand for the local betterment of Waikanae and its people.

3.

- Encompassing the above, the WRLC should, in their FDS provisions, ensure that their necessarily broad-brush approach does not *unintentionally* disable local body processes on the finer local considerations for which local Councils are probably better equipped.

Appropriate Actions:

That the Draft FDS be modified to provide for Waikanae, as it does for some other rural towns, sufficient tools/mechanisms and “authority” for KCDC to then properly consider a proposed self -serviced Eco-Lots regime on its merits, for conversion out of the inefficient Eco Hamlet status quo, per Plan Change processes. As other local councils must also retain authority and tools to make similarly appropriate Plan Changes.

In its tightest nutshell, we seek:

- assurances or provisions ensuring the current regime covering our precinct (at present under “Eco Hamlet” Rules) continue in principle (less the Kawakahia strip, but possibly including some similar land on the other, Eastern, side of Ngarara Rd) at least over the area mapped red, following

and, more importantly:

- provision be included in the FDS to preserve KCDC’s continued “authority” and tools to convert, in this case, the present Eco Hamlet Rules into Eco Lot Rules (as we describe them below) on their merits under established Plan Change processes.

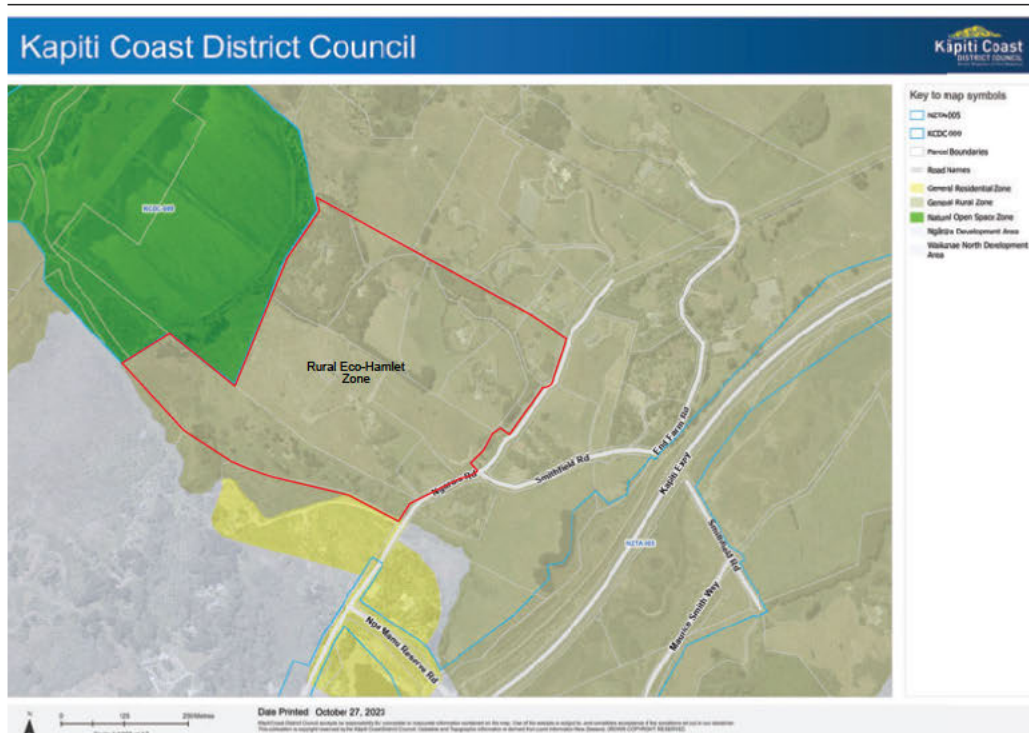
It would seem quite improper for greenfields considerations, as are the FDS’s core concern, to cut off (even as an unintentional consequence) the supply of poor, unused, rural land from those who would make the best and most efficient use of it.

Definition: To be clear, what we mean by “Eco” in this document is “a high sensitivity to landforms and their eco features and systems, including advancing global warming ameliorations and continued human existence within the ecosystems that make our survival possible”.

To set aside a “flippancy”, our case is not based on “greenfields envy” (!). Rather, it says that whatever are good reasons for continued greenfields intensive supply in the locations the FDS refers to, there are, equally, very good reasons for the peri-urban Eco Lot regime we propose adjoining Waikanae, providing a stable locality for the foreseeable future.

Fuller Specifics:

- on the Northern edge of Waikanae, between (including) 340 Ngarara Rd (top diagonal right inside the red line, below) and the Waikanae urban boundary there is land sitting idle, ie “inefficiently” in planning terms



The focus area outlined in red.

- diagonal bottom left of the red line is present urban
 - the green area includes the vast Harakeke and other pond and swamp areas
 - top right is more rolling farmland and some residential
 - middle and lower right of the red line includes properties that might well included into the proposed new, red, Eco-Lot precinct
- on land economically non-productive, already abandoned from farming
 - heavily rabbit (photos 1 & 2, following) and noxious-weed infected, inimical to native revegetation
 - actually in high demand (per recent sales) for peri-urban, small, urban edge, Eco Lots
 - virtually none of it suitable for any future urban intensive development.
 - we have already mapped solutions to make it available for small, “garden”, eco lots fitting to the:
 - steeply broken landscape (hills and hollows)
 - eco-features
 - with otherwise excellent outlooks
 - our local authority and population has a need for it, now:

- to remedy the degradation described
- to facilitate Coastal Retreat (c 1km from the sea)
- to progress Central Government's policies re increased supply of quality building land
- to answer the public interest in:
 - choice, especially for those wishing to retreat into equivalent spaces for the open-ness and sea views they will often have had to give up from their coastal properties
 - moderated prices
- and which "precinct" would form a stable, meaningful, buffer between ourselves and the more open farmland to our North.

At present the FDS signals no close cognisance of the area we speak of, or perhaps others like it:

- the otherwise uselessness, "inefficiency", of this potentially eco-housing land base
- its overwhelmingly not being suited to intensive urban
- its already part-transition into small lots, for which there is high demand but which transition is dogged by the present Eco Hamlet rule shortcomings
- its community value in providing excellent living conditions for those who wish that option.

The unfortunate effect of the Draft FDS in its present form, with respect to this area, is that it could be seen as officially indulging in a **land-banking** (a political red flag?) or an unnecessary land **withholding** and for **no future efficient purpose** other than the one we propose.

The Draft FDS itself actually appears to support our proposal in its "Priorities for Development". If the word "Greenfield" is replaced with "self-serviced Eco Lots" in the FDS's following paragraph (e), then our own situation is pretty well described.

"(e) Greenfield developments that are well connected to existing areas in our towns and cities and can be easily serviced by existing and currently planned infrastructure, including by public and active transport modes, where the location and design would maximise climate and natural hazard resilience."

Our proposal is an advance on Greenfields Intensive (which is not possible anyway on the land concerned): **self servicing** with respect to both a) roof water collection with ultraviolet filters (the most approved relief for the nation's depleting and troubled water supplies) and b) modern effluent-processing units preceding on-site disposal into vegetated areas. Together a substantial relief to urban servicing. Also a vast improvement on past rural practices.

Proposed Lot Sizes for the Eco Lots:

(which would be refined by KCDC under normal Plan Change processes; included here to illustrate the carefully considered efficiency of our proposed contribution to the national housing pool)

- minimum lot size, 0.2 ha (c half acre) of buildable land (ie, without violating eco features, etc, self serviced)
- minimum average lot size ex existing titles, 0.4ha (c one acre, 0.405 ha).

These figures represent high efficiency on the land we describe. And they have historical standing. The DDSP of 2012 proposed a 0.2 ha “Eco Hamlet” minimum. 0.2 ha generously doubles the traditional “quarter acre”. It demonstrates that we seek good fit to the landforms, not excessive yield. The 1 acre average minimum per existing title (0.4 ha) also appears as a lot minimum in the existing Eco Hamlet rules. Further, 1 acre (0.4 ha), as the average minimum, is more than adequate, in this sand country, for effluent dispersal ex modern primary-processing eco-units.

Thus, the smaller lots to fit on more constrained sites (constrained by steeper surroundings, eco features, any archaeological sites), the larger to accommodate larger eco-features, more broken terrain, and existing homestead curtilages:

- relying on the natural landforms within and adjoining the Eco Lot precinct (water courses, wetlands, ponds, flood extent zones, stormwater detention zones, the vast Harakeke wetlands adjoining to the West, steep faces in abundance, all unbuildable) in order to preserve the Eco and Iwi values intended to be protected by the future regime
- and moderating land costs by the consequently increased section supply
- establishing a buffer/transition regime that is stable (ie, unlikely to require further change in the foreseeable future) in our area adjoining the urban zone.

In this locality, virtually all of small holdings, there is a real vitality: land being actually cared for, many buildings renovated, one new-build about to begin, the few recent sales all rapidly concluded at solid prices. This is a highly desirable location, non-elite, a perfect example of desirable civil existence appropriate to its land type, of the kind a regional authority should be fostering wholeheartedly.

Surrounding this excellent base is the virtual wasteland (not at all productive, let alone in any meaningful use) as described earlier, begging to welcome more citizens in the same availabilities. **It would be a nonsense, and travesty, for those areas to be locked up** for at least 30 years with then any Greenfields Intensive future still **not ever possible** (as Council has already determined by its existing Eco Hamlet designation in which **Land Covenants** are imposed prohibiting future more intense rural subdivision — see below, Related Matters, 1.) By contrast, under an Eco Lot regime they could be most efficiently developed **now** within the objectives and intentions of the FDS, with future change.

Transitioning and Buffering:

The land concerned would serve ideally KCDC's previously desired "buffer" or "transition" margin between urban and full rural. It is not urban and it does not belong within the same "set" as the vast bulk of the general rural zone. The heavily treed character of the long #340 private drive (top, inside, red zone) stretching East/West between Ngarara Rd and the Pharazyn Reserve, separating from the more open country to the North, would well demarcate/serve as the extent of a Buffer precinct between full rural and urban.

It is important to recognise that the words "buffer" and "transition", as used in present KCDC's own planning materials, mean at least two things (needing a sensible balancing, between them).

- One is to block urban drift:

"... as a way of constraining urban expansion north of the Waikanae North Urban Edge. This will be achieved by clustering rural density housing around large open space areas north of the urban edge..." [that is exactly the area we speak of].

- The other is to transition, meaning there will be a progression, a greater density allowed close to the urban rather than farther out into the zone.

Both of these words "buffer" and "transition", plus the principle of local intensifications where appropriate as projected in the founding materials ("... potential for higher density through careful and innovative design", DDSP, 2012, p 4) describe the denser subdivision in the area we are speaking of, the Northern sections of Ngarara Rd. Whereas 304 Ngarara Rd, "Greenstone" / "Salt Ridge", has recently subdivided into Eco Hamlet exemplars (wastefully and with often poor fit because of excessive lot sizes and balance lots, as presently required), our own 0.2 ha proposal, loosened up by eco features and c 0.4ha minimum average lot size ex existing titles, would make far better landform fits and afford more attractive lots for family needs including the lwi potentialities signalled in the FDS."

Practically, the twin principle is well expressed in the transition from:

- the intensive, urban, but self-serviced "Stetson" development at 206 Ngarara Rd
- to the now Consented Eco Hamlet 304 Ngarara Rd / "Greenstone"/"Salt Ridge" (though that development, if actually implemented, would also lock-in larger balance-land lots that would have been far better converted immediately into smaller dimensions, more sensitively and more stably expressing the landforms; better to have been settled into its inevitable future configurations, given its close proximity to the present urban boundary, than later require major access disruption and with awkward fits. Better to go into Eco Lots from the start.
- thence to properties along the 340 drive (physically adjoining 304/"Salt Ridge") which offer exactly the good fit to its diverse landforms and eco features, with adequate open space, sensitive to (and formed around) the

local ecology, its present local character maintained attractively and unobtrusively, and with a stable future — ideal for this near-urban “buffer” locality.

This mixed Eco Lot precinct would be along the West side of Ngarara Rd, at least, but could/should also incorporate the East side of Ngarara Rd, buffering the urban area more broadly. (See Map and Captions.)

Such a precinct would not be out of place amongst the several other smaller precincts already characterising the locality, including the narrow Kawakahia strip.

There is no reason why iwi interests might not take up opportunities — would it be too much to biff the immense Kordia Telecom tower off the top of Harakeke and replace it with something more respectful to its past?



What sets the standard here? The rolling land foreground? or the background Hemi Matenga? or the irretrievably (permanent by title) **dominant** Kordia industrial tower atop Harakeke and a so-called “Sensitive Ridge”! The land is no longer farmed.

Related Matters:

1. The Presently Inefficient use of the land under the current Eco Hamlet provisions.

Possibly an Unintended Consequence, in More Detail, As Illustrated by the 304 Ngarara Rd/Greenstone Development.

[NB: The following details need cross-checking — the new Structure Plan is not clear re subdivision dimensions in the Ngarara Eco Hamlet Zone — an omission? (in fact it

provides no specific material on subdivision sizes). Possibly they are now 0.4 ha minimum, 1 ha average, as in the Rural Lifestyle Zone.

- Under the District Plan, the Greenstone owners were required, in order to create 3 prime sea-view properties (of no less than 0.4 ha each), to balance them with much larger lots on the land less lucrative for sales.

- In fact the current Plan says that for every 4 ha of parent land, you can have only two new titles (one down to 0.4 ha, the other up to 3.6 ha of “balance” land), leaving an average of 2 ha.

- Which balance land can **never**, under the **also required Land Covenants**, be further subdivided (having become less than the 4 ha required for any new 2 ha average subdivision) . What a waste! NZ has reached the point where it has to be much more careful of its land. Our proposal would make far better make use of otherwise “limbo” land while at the same time respecting/enhancing eco and lwi values.

- In the Greenstone case, the three apparently balance lots, in fact of themselves insufficient for Compliance, are of:

0.88 ha

3.05 ha

1.99 ha

occupying 5.92 ha of land otherwise very suitable for minimum 0.2 ha lots at more affordable prices, but which apparently can never now be made available to the more “affordable” market, although “affordability” has always been an objective from the foundational planning documents, 2012, to **and** reinforced by the new Governmental imperatives!

- Those “balance” lots on “Greenstone” / “Salt Ridge” include land highly suitable for 0.2 ha titles on a nicely varied landscape without any significant “Eco” features except those easily protected within smaller lots. So that, in place of the 3 “balance” lots, there could have been **many** attractive lots on land without Eco features except those easily protected.

- Perfect for the lower-priced sector of coastal retreat.

- All this on land not suited for intensive urban (much is very steep) but ideal for Buffer/ Transition purposes.

While in many ways an attractive subdivision, Greenstone/“Salt Ridge” stands as a sharp example of how the Eco Hamlet “balance” provisions applied very close to the city might check creeping development but only in the most wasteful way, denying the more affordable market. The buffer concept can be better achieved as we have outlined:

- supplying the more affordable market instead of having suitable land locked up

- creating a buffer better for its greater stability

- eliminating the inefficiency and disturbance of any conceivable later conversions into smaller lots.

In the case of 340 Ngarara Rd, by contrast to Greenstone / “Salt Ridge” next door, it is possible to supply the mixed market (with ideal, permanent, access) for a stable long-term solution in a way highly compatible with Eco and other qualities, not requiring future reconfiguring as will eventually (the complication of Land Covenants aside) need to be the case with “Salt Ridge”. There are other properties with similar configurations to #340.

Note: None of the above is a criticism of the Greenstone developers and their planners. What they have done is what the existing District Plan pointed them to do.

4. Hills and Hollows:

There is a further tension in the District planning materials between, on the one hand, seeking to protect the richer hollows (eg, between dunes) for agriculture **if** extensive enough and, on the other, encouraging building in hollows, not on hills. Both of these different objectives have been stated in the planning materials over time.

Our own situation along the #340 private drive points to the sensible outcome. The only peaty bottom land, on 340C, is now frequently under water, cannot be used for horticulture. It is classed as a Flood Extent zone and cannot be built on. And of course all present buildings are on higher ground. In the wider areas under discussion there is no lower ground under agricultural or horticultural production — most is pond or swamp, ideal for sustained biodiversity,

That’s the hollows. So why would there be the present policy disposition against building on hill/knoll/ridge tops? That is in fact where humans historically have tended to build, Tangatawhenua not least. And except where there are very cold winters or places of high winds, that is where the Hamlets of Europe have tended to be. And are greatly admired for their beauty — the fabled hill towns of Italy, France, Germany, etc, etc. And are where Maori have typically built Pahs unless closer to lower access for kaimoana, etc. And are where the good citizens of Waikanae have chosen wherever available (the slopes of Hemi Matenga, the Estuary area, all along the coastal ridge dunes). AND where the settlers of rural Ngarara Road have built where given choice and a free hand — examples of dwellings on knolls show all along the rural sections of that road. As was atop Harakeke originally. An historical preference that might have begun as a defensive measure and/or historical advantage is now in our emotional and aesthetic genes, is deeply cultural. To say nothing of safety from flooding. Plus it is exactly on the higher ex dunes of our own locality that the ground is least productive.

A reasonable planning conclusion is to allow building platforms according as the specifics of each property best indicate (and as consistent with other particular desiderata as set out in the Rules).

5. “Sensitive Ridge”, Harakeke Wetlands Frontage:

We hold a fully illustrated paper showing the “Sensitive Ridge” to be a fanciful creation: inconsistent with all that surrounds it East and West, including with Consented Greenstone / “Salt Ridge” frontage lots on its lower, and bare, seaward ground; inconsistent with its well-utilised pre-European past; utterly undermined by the huge technological tower now on permanent title; in fact grossly inferior to the 340A model next door, heavily vegetated, able to contain eco and culturally sensitive dwellings well masked within its plantings, increasingly blending into the newer indigenous plantings around the Pharazyn Ponds.

Some Supporting Photos:



This infestation extends entirely through the lands described, and well beyond. Except on smaller titles like our own where we have installed quality rabbit fences which **work**, enabling, for example, indigenous plants to re-generate amongst our extensive original-owner exotic woodlands. This proper care and conversion is one of the major reasons for the smaller Eco Lots best suited to this land.



Part of the “orchard lawn” at 340A Ngarara Rd, where the submitters would like to build a smaller house (on a 0.2 ha lot, extending well beyond the picture) for their older age. (In thirty years they will be very dead!) Note the care and lack of rabbit degradation by reason of the rabbit fencing around the present boundary, sufficiently economic and able to be monitored on smaller lots.



The same lawn in the opposite direction, showing a native understory ready to take over the original owners' Eucalypts. Now that rabbits have been cleared, we have natural regeneration plus plantings including all of:

Tarata
Karo
Mahoe
Totorā
Puka
Karaka
Horoeke
Nikau
Ngaio
Puriri
Putaputuweta
Corokia
and others



The “orchard lawn” is below the very small white marker (a plastic bag on a long pole!) high middle, where a virtually invisible house can be built (see next photo)



The kind of architecture (this is 158 Ngarara Rd) that blends into the landforms and vegetation (we would prefer dark “Karakā” green joinery). As envisaged for the “Orchard Lawn”, in an abstracted form of a Waka sitting across the ridge. Very good things are possible. Nga Mihi.

From: Richard Burrell [REDACTED]
Sent: Wednesday, November 1, 2023 11:56 AM
To: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Subject: Re: Future Development Strategy

Yes please I will speak

From: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Date: Wednesday, 1 November 2023 at 11:21 AM
To: Richard Burrell [REDACTED]
Subject: RE: Future Development Strategy

Thanks for your submission, Richard, we appreciate the feedback. Could you confirm, whether you wanted to speak to your submission at the hearing on 11th December. The hearing is an opportunity to directly speak to the committee most likely for 5-10mins.

Thanks

Parvati

From: Richard Burrell [REDACTED]
Sent: Wednesday, November 1, 2023 10:59 AM
To: Parvati Rotherham <Parvati.Rotherham@gw.govt.nz>
Subject: FW: Future Development Strategy

Hi Parvati

Thanks for your invitation to contribute to the discussion.

Here is my submission:

There was a big push for a Petone to Grenada (P2G) link road and cross valley link. Since then a lot more has been said about the threat of rising sea levels, Tsunami's, earthquakes and the cost of these road options.

Please reconsider other options. I suggest a link road from Kelson to James Cook Drive/TMG intersection (K2J), will achieve many more benefits than P2G, across manifold interests.

1. Kelson/Kennedy Good traffic lights need to be replaced with an interchange. A K2J interchange as part of a link road would save the cost of an interchange at Petone and bring forward the desperate need for an interchange at the Kelson Lights.
2. K2J was identified 20 years ago as the best route for an east west link. The recommendation was for it to immediately follow the completion of the Transmission Gully highway. This institutional knowledge was discovered by Chapman Tripp and can be reaffirmed if necessary.
3. A K2J route would open up a lot more hinterland as a solution for many of the biggest challenges the region faces than P2G would. In time it would also provide access to the land between Kilmister Block and SH58.

4. P2G would add to the Petone bottleneck, whereas K2J would be a shorter and more direct East/West route for those living in the areas with the greatest urban growth, being the high density developments in Norther Lower Hutt and in Upper Hutt.
5. HCC Plan Change 56 is creating more intensification of housing in the northern end of Lower Hutt than the southern, including over 200 homes approved in a single Avalon development. Old transport modelling needs to be redone now the National Policy Statement on Urban Development (NPS-UD) has been applied across the Hutt Valley.
6. [Go to this link to see photos and a video](#) which discusses the k2J option in more detail.

The Wellington Region has a shortage of land for affordable housing, business parks, distribution hubs, and needs a greater urban resilience plan against the threat of the BIG earthquake, Tsunami's and rising sea levels.

Between Kelson, Lower Hutt and Porirua city is the **Kilmister Block**, 1870ha of low-quality grazing land owned by the Crown, Hutt City Council and the Regional Council.

This land is not accessible by road, but it could be with an 'East West link Corridor' from Lower Hutt to Porirua. Wherever the east west link road goes, it would make sense that the road be much more than just a transport route, it

could be the access to 1,800ha of public land plus near as much private land.

The Vision Statement

The Kilmister Block is a unique opportunity to create a Comprehensive Development Plan of 1,870ha into an area for urban growth that would also preserve the native bush and make this regional recreation park more accessible.

A Kilmister Project would demonstrate that Wellington is open for business on a sustainable platform that exceeds all the other growth options, and it could be an incredible example to the rest of NZ of how to plan and grow in a

sustainable and complementary way with existing networks and infrastructure.

This is a bold project, but the benefits would address the housing shortage for the next 50 years and stem the outrageous growth in property prices which will return sooner than is best for NZ.

The opening of the Transmission Gully highway is driving growth up the Kapiti Coast and putting pressure on the zoning of Wellington's agricultural food basket land. If we don't do something as bold as expanding into the

Kilmister Block, Wellington's growth will by default spawl up the Kapiti Coast and into the Horowhenua.

The Kilmister Block is central to Wellington, Porirua, Lower and Upper Hutt and offers an opportunity to showcase that garden city urban development is still possible in the 21st century. It would complement and utilise the

established services, facilities and community activity in the region and provide the resilience plan everyone is desperately looking for.

- Greenfield development for 30,000 affordable homes.
- Business parks for technology, distribution and other expansion.
- Transport and other resilience against all the major Wellington region threats.
- Access to native reserves and recreation parks.
- It's not just about the money, but we need money and this could earn over \$100 million per year through the life of the development of this housing and business growth plan, if population growth demands it.
- This model could net the region \$15 billion in profit if 30,000 homes are built and sold. At just 200 homes per annum, it would feed \$100 million* back into the Wellington region every year.

Wainuiomata second access and alternative cross valley route

HCC is currently reviewing its District Plan and is likely to rezone the rural land in Norther Wainuiomata to residential, which will create potential for 1,700 homes. A second road into Wainuiomata is likely. **The two attachments** make a good case for the second access to be Wainui to Naenae. Beyond all the benefits to the infrastructure in both communities, this

would also create a 5km route from Wainui to Kelson and if K2J goes ahead, only another 6.2km's to TMG.

Ngā mihi nui
Richard



Parvati Rotherham

From: Simon Byrne [REDACTED]
Sent: Friday, 3 November 2023 11:47 am
To: futuredevelopmentstrategy
Subject: Re: Submission on the FDS

Just a written submission please. I feel strongly about the need to have a district plan containing 30 years of capacity, also clarity on how the figures were arrived at (as required by the NPS-UD) but am realistic enough to know submissions rarely result in any change.

As an aside Masterton certainly does not have sufficient capacity in the waste water system, despite what the current Asset Management Plan for that says. Evidence of the issues are very much in the news on this e.g issues at Cockburn St which suffers from backflows despite being close to one of the largest underground main pipes on it's way to the treatment plant at Homebush. Sure there is capacity when its not raining, but in heavy rain the existing pipes, even the largest pipes close (in hydraulic terms) to the treatment plant, get full.

It just depressing central government does it's best to solve an issue like affordable housing, and infrastructure planning, and local officers simply carry on as before paying lip service to the new requirements.

Chief Executive commissions
 independent review of wastewater issues
 - Masterton District Council
mstn.govt.nz



Also



Simon

PS please treat this as a further submission!

On 3 Nov 2023, at 11:03, futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz> wrote:

Kia ora Simon,

Thanks for your written submission. I appreciate the time taken to provide us your thoughts. I would like to confirm if this a submission in writing only or whether you were intending to speak to the submission.

Please let us know. We'll be reviewing this submission along with the others and preparing our report for the committee by end of November.

Thanks

Parvati

From: Simon Byrne [REDACTED]
Sent: Thursday, November 2, 2023 9:25 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Submission on the FDS

Hello,
Please see my submission on the FDS, which fyi will also provide the basis of my submission on the proposed Wairarapa Combined District Plan.

Rgds

Simon

PS it would help if the alternatives to using the online feedback/submission process were made clearer on the haveyoursay website! (eg email address and/or mailing address)

ATTENTION: This correspondence is confidential and intended for the named recipient(s) only. If you are not the named recipient and receive this correspondence in error, you must not copy, distribute or take any action in reliance on it and you should delete it from your system and notify the sender immediately. Unless otherwise stated, any views or opinions expressed are solely those of the author, and do not represent those of the organisation.

Submission on Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS)

By Simon Byrne, ■ Oak Street, Masterton

Date: 2nd November 20123

It is my opinion that neither the FDS (or the related operative or proposed Wairarapa Combined District Plan) meet the legislative requirement to provide for growth in housing for the next 30 years. THE FDS falls WOEFULLY short in this regard.

I am extremely disappointed to see neither the letter of the law or the underlying intent of the new planning legislation has been implemented by the GW project team responsible for the FDS (specifically NPS-UD s2.1 being affordable housing). My reasons for having this opinion are as follows:

1. The FDS is based on the - Housing and Business Development Capacity Assessment (HBA) and the section of the HBA relevant to Masterton appears to contain fundamental errors in the way a theoretical estimate for Total Realisable Capacity (TRC) has been calculated. This means the conclusion reached in the FDA and HBA that Masterton has sufficient capacity should be reviewed, and probably corrected to state that NEITHER the operative or proposed plan provides sufficient capacity for Housing Development. In my opinion the theoretical TRC is probably about half the stated figure of 7968 units, when the errors are taken in account.

Note: I was able to easily come to this conclusion by "overlaying" the SAT2 arcgis online maps with the Wairarapa Combined District Plan maps, which show planning zones and precincts, and can also show the level of development (so called "satellite" view) and section boundaries.

- a. Page 307 has a figure for 7968 for TRC vs a calculated demand including competitive uplift of 7245 units.
- b. Page 307 also has the SAT2 area "Upper Plain" (which is zoned Rural) having a TRC of 2256, or 28% of the total TRC. A small area in "Upper Plain" is in the operative (and proposed) District Plan as a Future Urban Zone (known as Chamberlain Rd in the FDS/HBA) but that is only about 20ha in size, so will only provide circa 200 housing units. This raises the question of where does the rest of the 2256 dwelling units come from? "Upper Plain" is zoned "Rural" which, under the proposed plan has a minimum section size of 40ha (operative plan is 4ha or more for special rural zoned properties), it is also classified as Highly Productive Land (LUC 1-3) which is specifically excluded from urban development under the FDS "constraints". This means that neither the current operative plan, or proposed plan allows for any urban development in this SAT2 area, except for (maybe) 200 dwelling units.
- c. A similar issue exists with the SAT2 area "Lansdowne East" where TRC is estimated at 1563 units (21.5% of the total TRC), but only a small development on Gordon St is likely to provide significant numbers of new dwellings. Most of undeveloped land in this SAT2 area is to be re-zoned "Lifestyle" fro Rural under the proposed plan with a minimum section size of 5000m², therefore the changes in the proposed plan will NOT result in a significant number of new dwellings. The SAT2 area "Lansdowne West" has a capacity of 569 but also has the undeveloped rural areas re-zoned as Lifestyle, so those 569 also look impossible to achieve.

- d. Similar to the above, the SAT2 area "Opaki" has a TRC estimated at 611 units but the majority of undeveloped land near Masterton is zoned rural (40ha minimum) or the new "Lifestyle" (5000m² minimum) under the proposed plan.

2. In the HBA section 8.1.5 there is a THEORETICAL figure stated of 11,000 to 11,500 capacity provided for in the CURRENT plan. Apart from the obvious issue that there is a proposed plan published (pretty much identical to the draft plan published many months ago), the figure of 11,000 does not align AT ALL with the TRC of 7968. It is not 100% clear from the wording in the HBA how the 11,000 figure was arrived at, so maybe not much credibility should be assigned to it? but it seems likely the local planners have provided them based on local knowledge and plans not yet included in the District Plan. As I am sure the FDS project team know, development capacity for the next 30 years is supposed to be PLAN ENABLED and not documented in unpublished plans drafted by planners, and the FDS is supposed to be a driver in making that happen.

3. To add to this, I have had informal discussions with the planners at MDC during the draft consultation stage and was told a figure of "several thousand" (so nowhere near 11,000) was provided for in the (then) draft district plan, with a significant contribution coming from the new medium density housing precinct (MRZ). Subsequently I worked out that the MRZ only covers about 5% of the urban area, so by simple arithmetic it simply cannot provide much new dwelling capacity. In addition, I was informed an MDC document called the "Masterton Urban Growth Strategy" (MUGS) would be updated in line with the proposed district plan, and that seemingly would be the main planning aid for MDC in respect of planning new growth in housing. It seems to me that, for their own reasons, MDC would prefer to rely on the updated "MUGS" document and not implement the NPS-UD!

).

Theoretical exercise based on SA2 areas, leading to theoretical 18684, feasible 10,581, reliable 7968.

MDC state 11,000 to 11,500 under current plan. Not sure which one of the 3 this is !

Last 5 year the new dwelling consents was around 200 pa, prior was 63 p.a.

BUT last few years there were large greenfield developments in cashmere, chamberlain, solway north and south, gordon street, and lots in rural areas due to the new 4ha rule.

William donald drive, barracks, gimson, taranaki

A MASSIVE subdivision planned at Solway in south Masterton will be one of the largest seen in the town for more than a decade.

It has been lodged with the Masterton District Council for planning approval and is subject to public submission, currently being advertised.

Submissions close March 30.

More than 15ha of farmland, already zoned residential, bordering Solway Crescent, South Belt, Hood aerodrome and the Waingawa River, is to be subdivided into 117 sections.

To access the new houses, three new roads will be constructed.

*The proximity of the aerodrome mean buildings will be restricted to 10m in height.
The council has already approved the first 10 lots off South Belt with the remaining to be developed over six stages, expected to take around 10 years.*

Theoretical has 2256 realisable identified in upper plain but there is nowhere this number possible under the proposed plan with just the cashmere FUZ in that area and the rest HPL. Would have to be greenfield.

Another 1563 in Lansdown East but only Gordon St is planned there.



la Ara Aotearoa Transporting New Zealand Incorporated

submission to

Wellington Regional Leadership Committee

on the draft

Future Development Strategy

Email : future.developmentstrategy@wrlc.org.nz

6 November 2023

Contact: Dom Kalasih, Interim Chief Executive
la Ara Aotearoa Transporting New Zealand Incorporated



Ia Ara Aotearoa Transporting New Zealand Incorporated submission to Wellington Regional Leadership Committee on the draft Future Development Strategy

1. Representation

- 1.1 Ia Ara Aotearoa Transporting New Zealand Incorporated (Transporting New Zealand) is made up of several regional trucking associations for which Transporting New Zealand provides unified national representation. It is the peak body and authoritative voice of New Zealand's Road freight transport industry which employs 32,868 people (1.2% of the workforce) and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people, or 4 percent of the country's workforce and contributes 4.8 percent of New Zealand's GDP¹.
- 1.2 Transporting New Zealand members are predominately involved in the operation of commercial freight transport services, both urban and inter-regional. These services are entirely based on the deployment of trucks both as single units for urban delivery and as multi-unit combinations that may have one or more trailers supporting rural or inter-regional transport.
- 1.3 According to Ministry of Transport (MOT) research (National Freight Demands Study 2018) road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand or about 85% of the surface freight activity measured in tonne-kilometres.

2. Introduction

- 2.1 Transporting New Zealand provides sector leadership and believes we all need to operate in an environment where the following must be managed to ensure:
 - The safety and wellbeing of our drivers and other road users
 - The minimal impacts of transport on our environment
 - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 2.2 Transporting New Zealand welcomes the opportunity to comment on Wellington Regional Leadership Committee's draft Future Development Strategy (FDS).
- 2.3 Bearing in mind that regardless of even the most optimistic modal share shifts to coastal shipping and rail occurring, given they carry such a relatively small amount now, in thirty years' time it seems highly likely that society will still be heavily reliance on freight moving by road growth.
- 2.4 Furthermore, given the relatively short distances between the Wairarapa, Wellington and Horowhenua regions, most freight movements between these regions will be undertaken on road.

¹ [Transport factsheet \(mbie.govt.nz\)](https://www.mbie.govt.nz/transport-factsheet)

- 2.5 A resilient and reliable road network which has the capacity to accommodate the growth, particularly on strategic freight routes, will be key to regional economic growth.
- 2.6 The predominant lens and the scope of our submission are the impacts and risks associated with commercial (road freight) traffic and the economy that traffic serves.

3. Question 1: Vision and strategic direction of the FDS

- 3.1 We are unsure of the vision because it speaks more about our behaviours as we go about seeking goals rather than the setting of any objectives or aspirational goals or outcomes.
- 3.2 At face value, the notion of us being responsible ancestors appears laudable however, we do have concerns about how well we really understand the long-term impacts of our actions and therefore we question the degree of certainty that we will have in being confident our future actions do not compromise the ability of future generations to meet their own needs. Our lack of progress to date to make a significant impact on better managing climate change is one such example.
- 3.3 Of the 5 proposed priorities, we have no hesitation in agreeing with those related to affordable housing, resilience, infrastructure and employment.
- 3.4 In regard the proposed priority of promoting a zero-carbon region, we are not against this as it is commendable, However we believe there needs to be more robust discussion and debate about the associated barriers and trade-offs to achieve that.

4. Question 2: the plan for where we develop housing

- 4.1 We agree that the majority of growth over the next 30 years should occur within boundaries of our current towns and cities.
- 4.2 We urge planners to ensure that as our town and cities grow, they carefully consider freight movement between those areas and the deliveries and services undertaken by trucks. For example, we recommend providing heavy vehicle by-passes rather than having them crawl through heavily pedestrianised main streets. Without by-passes, as growth occurs and trucks move through more densely populated areas, there will be increasing risk to safety and the environment. Similarly, in high-density, populated areas, careful strategic thought needs to be given to enable activities requiring trucks, such as rubbish collection and the delivery of house construction materials.

5. Question 3: the plan for where we develop business land

- 5.1 In principle we support concentrating business development in existing urban areas and rural towns.
- 5.2 To further support the proposed development around Tararua South Road, Levin, we believe the State Highway 1 upgrade from Otaki to north of Levin (O2NL) should be given priority for completion as this will provide greater road network resilience.

- 5.3 We are relieved good progress is being made with the Manawatū-Tararua Highway as that will provide better access and resilience from the north to the proposed Waingawa development near Masterton. We would however also expect and envisage commitment to significant improvement of the road over the Remutakas as that is currently unreliable and remains challenging.

6. Question 4: the plan for infrastructure to support development

- 6.1 We support the approach to maximise the current and planned infrastructure in the most efficient ways possible.
- 6.2 However, we are concerned by the 30-year outlook as in many cases the current infrastructure has little, if any, spare capacity.
- 6.3 Page 18 of the draft FDS Consultation Overview Document refers to unlocking the development potential of public transport including rapid-transit-oriented corridors to enable mode shift, and also says: “We cannot afford all the infrastructure required”. In principle we agree that improved public transport has a role to play in better managing growth however, we do not believe there has been enough quality analysis to identify how public transport should be improved. There has been far too much uncertainty with the planning of mass rapid transport in Wellington for us to have any confidence that this will be a good return on investment and given the acknowledgement in FDS that we cannot afford all the infrastructure required, we have significant concerns and urge caution with any further progress.
- 6.4 Furthermore, given the affordability issue, and being mindful that central government has floated the idea of potential new funding streams or more innovative ways of collecting revenue, we believe the FDS should consider similar.

7. Question 5: the plan where to limit or avoid development in our region

- 7.1 We agree and support the proposal to ensure communities are safe from significant natural hazards. We presume this work will include and underpin efforts to making strategic transport routes more resilient.
- 7.2 On the proviso a balanced and reasonable approach is taken, we also agree and support that regional growth avoids creating new risks. History has shown us with the Resource Management Act that a sensible balance must be undertaken when considering risks and those risks need to be kept in perspective and respective context, otherwise this could be a major barrier to growth and the pace of it.

8. Question 6 : reflecting iwi and hapu values and aspirations

- 8.1 We agree with iwi and hapu values and aspirations being reflected.

END

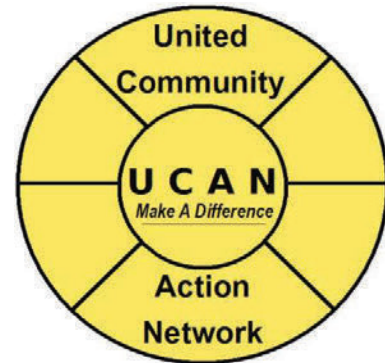
UCAN

<https://ucannz.wordpress.com/>

7 November 2023

Wellington Regional Leadership Committee (WRLC)

future.developmentstrategy@wrlc.org.nz



WELLINGTON REGION FUTURE DEVELOPMENT STRATEGY (FDS)

Introduction

This is a response to the draft FDS which is open for comment until 9 November. We also want to make oral comments to the Hearing Committee when it sits in Wellington.

These comments are from members of UCAN (United Community Action Network). UCAN supports individuals and households marginalised by current practices in the health, housing and transport sectors.

Our main point

The FDS needs to be much more inclusive, and in particular recognise the Article Three right to a decent home¹ for all residents. In other respects members support the general direction in the Strategy but note there are fundamental uncertainties about, and biases in, the implementation processes.

Vision

Following from that point we suggest the last sentence of the draft vision for the region should be amended to read:

‘. . . The future for our region is founded on Te Tiriti o Waitangi and realised through: the tino rangatiratanga of tangata whenua; the recognition of the rights and privileges of residents; and the exercise of good government.

Residents

This response to the draft FDS is prompted very directly by the evidence to and apparent lack of action on Coroners’ findings about deaths that have occurred in accommodation available to people who needed supported or assisted housing. However we know there are many people

¹ ‘Housing Inquiry: Implementing the right to a decent home in Aotearoa – fairness and dignity for all’ (2023) NZ Human Rights Commission. We are approaching the topic from an Article Three position. As the revised vision implies all the Articles are relevant.

living in the region without a decent home. Official figures show that about 2,500 applicants in the Wellington Region have a serious or greater need for housing².

Read from that point of view the Housing and Business Development Capacity Assessment (HBA) that informs the FDS does not comply with the National Policy Statement–Urban Development 3.23(2). Perhaps there are some demographic categories implied in the current categories for housing types but they do not reach the standard of specificity of the illustrations in the NPS–UD.

At the very least the FDS should advance the framework in the Regional Housing Action Plan (RHAP) by including:

- Estimates of current provision and need for assisted and supported housing
- Goals and objectives that relate the estimates to neighbourhood development and redevelopment
- Direct links to the regional housing dashboard to report the unmet need for a decent home.

Organisations

There are potential sources of relevant information. For example Health NZ (previously Capital Coast Health District Health Board) is well placed to make an ‘evidential contribution’ to estimates of need for housing for people with enduring mental illness³. To the best of our knowledge it has not done so. In our opinion that is a useful starting point for refining the information already available from the Ministry of Social Development.

It is inappropriate and unrealistic to rely on Community Housing Providers to compile estimates of or respond to the total unmet need although this seems to be an implication in the current approach of the WRLC. However the sector, with Locality Health Networks, could contribute useful insights related to meeting those needs. As far as we know there are 27 Community Housing providers in the region with about four providing emergency and/or transitional housing⁴. That provides a manageable basis for some regional monitoring.



Convenor



² <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html> accessed 30 October 2023 total includes Horowhenua TLA. We have requested additional information about the number of people affected.

³ ‘Review of the care and treatment provided to five persons who attended the CCDHB Mental Health, Addictions and Intellectual Disability Services’ (July 2016) Mellsoy, Hamer and Haitana. See also the subsequent inquests conducted by Coroner Robb.

⁴ <https://nzccss.org.nz/nzccss-housing-and-support-providers-tool/>



Submission on the draft Wairarapa-Wellington-Horowhenua Future Development Strategy 2023

To: Wellington Regional Leadership Committee
From: Jayne Taylor-Clarke (Acting Director Land Investment and Planning, Ministry of Education)
Date: 9 November 2023
Subject: Submission on the draft Wairarapa-Wellington-Horowhenua Future Development Strategy 2023

1. Background

This is a submission to the Wellington Regional Leadership Committee (WRLC) on the draft Wairarapa-Wellington-Horowhenua Future Development Strategy 2023-2073 (the draft FDS).

The Ministry of Education (the Ministry) is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Wairarapa-Wellington-Horowhenua region.

2. Overarching Comments

The Ministry holds several key roles as Crown Agency, provider/developer of additional infrastructure and landowner relating to the provision of social infrastructure across the education system. In order to plan for education requirements to support well-functioning urban environments, the Ministry seeks to understand the likely location, quantum, timing and type of growth in the region. The draft FDS is a key document to assist the Ministry in our planning.

The Ministry has valued the opportunity afforded by the partnership to be involved in the development of the draft FDS and thanks the WRLC for the opportunity to make a submission on the draft FDS.

The Ministry looks forward to continuing to work with the WRLC partners in the development of the Implementation Plan for the draft FDS, subsequent plan-making processes including structure plans, and any future Regional Spatial Strategy.



The purpose of our submission is to broadly support the draft FDS and to seek clarification or amendments on a number of matters.

3. Part 1 – Statement of iwi and hapū values and aspirations for urban development

The Ministry acknowledges the importance of Te Tirohanga Whakamua as a collective statement of iwi and hapū values and aspirations for urban development in the region. The Ministry acknowledges that Te Tirohanga Whakamua has informed the draft FDS, as required by the National Policy Statement on Urban Development (NPS UD), and that it will inform future work carried out by the WRLC.

Relief sought: Retain Part 1 as notified.

4. Part 2 – Where, when and how will we develop

The vision of being responsible ancestors and promoting a compact urban form to create a low-emissions and climate-resilient future is supported. The strategic direction to deliver the vision is also broadly supported. The ability to deliver on the vision and strategic direction will require a clear and effective Implementation Plan, and a continued strong partnership amongst WRLC.

The Ministry broadly supports the approach set out in the draft FDS which would ensure that urban growth is located in areas suitable for development whilst avoiding growth in areas which are constrained (such as through natural hazards, or environmentally sensitive areas - wāhi toitū/wāhi toiora). It will be important in implementing the FDS to be clear about how decision-making will occur in relation to wāhi toitū and wāhi toiora areas. This may require further regulatory response through district or regional plans / policy statements.

Diagram 7 on page 33 provides a good summary of how the FDS will prioritise development areas and the Ministry is broadly supportive of the approach to prioritisation. Again, it will be important in implementing the FDS that the prioritisation of growth areas across all of the partner councils is consistently applied. The prioritisation criteria outlined in Diagram 7 should be applied to out-of-sequence or unanticipated development proposals as well. Ensuring that this is reflected in subsequent plans and policy statements is particularly important to provide certainty for infrastructure providers.

Diagrams 8-11 provide a succinct and clear spatial outline of the prioritised settlement pattern. As outlined in the draft FDS, given that there is already significant residential capacity enabled in existing district plans, the challenge will be to ensure that over time the vision and strategic direction for the region can be met by ensuring growth is directed into these priority areas. It is noted on page 39 that about 40% of development will be contained within the prioritised areas, and 60% within existing residential areas as intensified residential development. The challenge for the partnership will be to ensure that the appropriate planning is undertaken in order to ensure that the incentives to provide high quality intensified development are not undermined by opening up large new greenfield areas where the strategic direction of the draft FDS cannot be met.

The Ministry has some concerns about the level of uncertainty there is for infrastructure providers when assessing the likely location, quantum, timing and type of growth in the region. This creates uncertainty regarding where and when investment will need to occur in the schooling network. It will be critically important to ensure there are strong and consistent implementation measures by councils across the region aligned with the FDS if the vision and strategic objectives of the FDS are to be met.

Relief sought:

- Retain Part 2 as notified except to the extent necessary to address points raised in this submission;
- Ensure the Implementation Plan contains detail of how development proposals in wāhi toitū and wāhi toiora areas will be managed – for example through district / regional plan / policy statement changes;
- Clarify that the prioritisation criteria in Diagram 7 will also apply to out-of-sequence / unanticipated development proposals;
- Support the intention to undertake further work on ensuring good outcomes in terms of intensification and ensure that the strategic direction set in the draft FDS is not undermined by significant greenfield growth beyond the prioritised areas;
- Ensure the Implementation Plan clearly outlines actions to ensure a consistent approach to implementation across the councils to deliver upon the strategic direction of the draft FDS.

5. Part 3 – Infrastructure to support development

The need for the draft FDS to address additional infrastructure requirements under the NPS UD is essential to achieve well-functioning, sustainable and thriving urban areas and communities. This will ensure that urban development is integrated with infrastructure planning and funding (NPS UD – Objective 6), achieve integrated land use and infrastructure planning (NPS UD Policy 10 b) and that additional infrastructure is available to service development capacity (NPS UD Sections 3.5.1 and 3.15.2d). As noted in section 4 of this submission, strong and consistent implementation measures to align planning across the region with the FDS will assist in providing more certainty as to where and when growth will occur, and inform the Ministry's response to investment across the schooling network to support residential growth.

It will also be critically important to ensure the timely provision of public transport, walking and cycling infrastructure to support growth, if the vision and strategic objectives of the draft FDS are to be met.

Relief sought: Retain Part 3 as notified.

6. Part 4 – Delivering the strategy

The Ministry understands that a separate Implementation Plan will be developed which will set out the actions required to deliver on the draft FDS and this will include key infrastructure and non-infrastructure projects. The Ministry is supportive of the need for regulatory changes, such as alignment of district and regional plans, including the Regional Policy Statement, in order to provide additional certainty that the prioritised settlement pattern will be delivered.

Scoping this work early and collaboratively is important to ensure these consequential changes can be developed in a way that provides for integrated outcomes across a wide range of regional and local workstreams. Such an approach allows infrastructure providers such as the Ministry to undertake iterative planning to ensure educational provision can be made to support residential growth areas as and when required.

7. Appendices

Appendix 1 - Prioritised areas for development

Overall, the Ministry supports the criteria for prioritising areas for development, subject to the comments in Part 4 of this submission.

Point 3 in Appendix 1 states that Priority Development Areas (PDAs) may be reassessed from time to time and other areas may be identified as PDAs over the life of the FDS. This is a practical approach given that circumstances can change over time, but it would be worthwhile clarifying that the identification of any new PDAs will need to meet the prioritisation criteria and what process will be used to collaboratively identify and evaluate these with regional stakeholders.

Relief sought: Amend section 3 of Appendix 1 to clarify that PDAs will need to be assessed for consistency with the prioritisation criteria in Appendix 1, or alternative relief to similar effect, and that this will be a collaborative exercise with regional stakeholders.

Appendix 2 – What does this mean for our sub-regional areas?

The breakdown of the draft FDS into sub-regional areas is helpful in that it provides a somewhat more workable scale from which to undertake more detailed planning. Additionally, the Ministry commends the WRLC for considering additional infrastructure required to support the planned growth, which aligns with the NPS UD requirements.

Relief sought:

The Ministry has undertaken further network analysis since the FDS was drafted and requests that the localised infrastructure requirements for the sub-regional areas be updated as follows (additions shown underlined and deletions shown ~~struckthrough~~).

Page 66

Additional primary and secondary school capacity will be needed to provide for projected growth in Wellington City.

~~If development was to occur in prioritised areas of in the Porirua District at the projected rate, there would be it is likely there would be a requirement for additional education provision there. If development proceeds as projected for the entire The Porirua Northern Growth Area, then it is anticipated that two will require at least one additional primary schools and an additional secondary school may be required. if development proceeds as projected. The Ministry of Education will continue to closely monitor the status of the Porirua Northern Growth Area.~~

~~The distribution of development in Eastern and Western Porirua and at Kenepuru may require significant new investments in educational facilities in these areas to cope with development growth. The Ministry of Education will monitor the ongoing developments of Porirua East, Porirua West and Kenepuru to see whether any new investments, or changes to existing schools are required within these growth areas. The Ministry of Education has been working with local iwi to establish a new wharekura in Porirua West which will serve the wider Porirua catchment. It is anticipated that this kura will be operational in the near future.~~

Page 72

Based on the prediction of a significant increase in development around rail stations and in centres in the Hutt Valley, the Ministry of Education would need to bring forward planning at the earliest opportunity to plan to add roll growth to the current school network. There are potential land constraints with the land generally being brownfield, so this brings challenges to establish new schools in areas of already existing density. New ways of delivering education assets are likely to be required, such as shared investment, land swaps and the retrofitting of existing sites. will be monitoring the capacity of the schools within the current school network. Although there may be expected student roll growth, there are large numbers of students not attending their local schools in the Hutt Valley, with some schools having large out-of-zone student numbers, or not operating enrolment schemes, meaning students have had choice in terms of schooling. It is likely that the Ministry of Education would introduce new enrolment schemes, or amend existing enrolment schemes, and where necessary, intensify existing provision before looking at establishing new schools in the Hutt Valley.

Page 76

Regarding education requirements:

- *It will be important to ensure that the focus and alignment of planning and implementation is on the areas prioritised for development. The Ministry of Education has identified these growth areas within its National Education Growth Plan 2030 (NEGP) and National Education Network Plans (NENP) and these will influence education investments going forward.*
 - *New educational facilities will need to be provided in Waikanae in the next 10 to 15 years, dependent on growth rates and locations. Within the next 10-15 year period, a primary school is anticipated to be provided within the general residential area of Waikanae.*
 - *New educational facilities will need to be provided in Levin in the next 10 to 15 years, dependent on growth rates and locations. Within the next 10-15 year period, a primary school is anticipated to be provided within the general residential area of Levin. The Ministry of Education has gazetted the proposal for a new kura in Levin (in partnership with the local iwi) and this will be operational within the short to medium term (3-5 years).*
 - *The Ministry of Education will continue to monitor the population growth rate and roll growth across all of the educational assets. While the existing network is expected to be able to address educational requirements from the areas prioritised for development, this will need to be carefully monitored if greenfield growth occurs beyond these areas.*

Appendix 4 – More detail on infrastructure to support development

The Ministry requests that the overall statement relating to Education infrastructure be updated to reflect the latest network analysis. The requested updates are outlined below (additions shown underlined and deletions shown ~~struckthrough~~).

Relief sought:

Page 89

The Ministry of Education (MoE) supports the focus on development in existing towns and cities in preference to greenfield development. MoE have identified potential educational requirements if development was to occur in the areas prioritised in the Future Development Strategy and at the scale and pace projected in the Housing and Business Development Capacity Assessment (HBA). With any intensification in brownfield land with site constraints, this then brings new challenges for where the MoE will establish new schools in areas of existing density. New ways of delivering education assets are likely to be required, such as shared investment, land swaps and the redevelopment of existing sites.

The MoE ~~They~~ noted that there is significant residential capacity provided through council plans outside of the prioritised areas as well, and this creates some uncertainty for infrastructure providers as to where growth will occur. The MoE will continue to optimise its capacity within the entire catchment of the education network.

The Ministry of Education will also be monitoring immigration numbers and how this may impact the current network. For example, the Wellington City catchment will be carefully monitored as the school network roll numbers has witnessed a slight decline but it is expected that this will change with a rise in immigration.

~~With the focus on intensification, there are potential land constraints, with the land generally being brownfield and there being topographical constraints, which brings challenges to establishing new schools in areas of already existing density. new ways of delivering education assets are likely to be required, such as shared investment, land swaps and the retrofitting of existing sites.~~

The Future Development Strategy advocates for a continued close working relationship with MoE as part of the WRLC Urban Growth Partnership.

More detail is provided in Appendix 2 where commentary is provided for each subregional area.

Concluding comments:

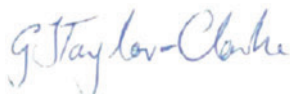
The Ministry thanks the WRLC for the opportunity to be involved in the development of the Future Development Strategy, both as a Crown Agency and as an infrastructure provider. This has provided the Ministry with insights both into the challenges faced by the WRLC when planning for growth in the Wairarapa-Wellington-Horowhenua region, and into the solutions proposed. The Ministry looks forward to a continuing relationship with the WRLC and to working on the development of an Implementation Plan for the draft FDS.

The Ministry does not wish to be heard in support of its submission.

Nāku noa, nā



Blair Firmston
Manager – Spatial Planning
Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital



Jayne Taylor-Clarke
Acting Director Land Investment and Planning - Te Pou Hanganga, Matihiko | Infrastructure & Digital



Submission on Wellington Regional Leadership Committee

Draft Future Development Strategy

Your details³

Contact details

First Name:

Last Name:

Email address:

Postal address:

Phone:

Is your feedback on behalf of an organisation or business*? (if yes, this confirms you have the authority to submit on the organisations behalf) Yes No?

Organisation Name

* Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearings

Do you wish to attend a hearing to present your submission during the hearings process during business hours beginning 11 December 2023? Yes No

If yes please indicate the most convenient location for you to be heard in order of preference⁴

- Monday 11th December – Wellington CBD –**
Greater Wellington Regional Council, 100 Cuba Street
- Tuesday 12th December – Masterton –**
Greater Wellington Regional Council, 34 Chapel Street
- Wednesday 13th December – Paraparaumu –**
Kapiti Coast District Council, 175 Rimu Road
- Online (we will send you a link)

If yes please ensure we have your email address and phone number.

³ Please note: We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However, if requested, we may make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email: future.developmentstrategy@wrlc.org.nz. A copy of the full privacy statement can be found online.

⁴ We will endeavour to accommodate your first preference. Dates and times will be confirmed once submissions close. Additional dates may be added depending on availability and need.

These questions are optional but will help us understand which groups of the community are engaging with us.

What gender are you?

- Male Female Prefer not to say

What age group do you belong to?

- 15–17 18–24 25–34 35–44
 45–54 55–64 65–74 75+

Which ethnic group(s) do you feel you belong to? (Please select as many as apply)

- Pākehā/NZ European Other European Māori
 Cook Island Māori Samoan Tongan
 Indian Chinese Southeast Asian
 Other (please specify):

Where in our region do you live?

- Kāpiti Coast
 Te Awa Kairangi ki Tai / Lower Hutt
 Porirua
 Te Awa Kairangi ki Uta / Upper Hutt
 Masterton
 Carterton
 South Wairarapa
 Pōneke / Wellington City
 Horowhenua
 I don't live in any of these areas.

Would you like to subscribe to the WRLC newsletter?

- Yes No

Your Feedback

We want your views on how this “big picture” approach could be improved. We have six questions below and an opportunity to provide more detail. We strongly encourage you to read the proposed approach and accompanying information before answering the following questions below.

QUESTION 1: VISION AND STRATEGIC DIRECTION OF THE FUTURE DEVELOPMENT STRATEGY

What are we proposing?

The overarching direction that guides the Future Development Strategy is made up of the vision, strategic direction, the 5 priorities for how to prioritise areas for development and statement of iwi and hapū values and aspirations for the development in our region.

Why are we proposing this?

We aspire to be responsible ancestors by ensuring the Wairarapa-Wellington-Horowhenua Future Development Strategy will provide for growth that is sustainable by meeting the needs of the present without compromising the ability of future generations to meet their own needs. We want our future to be made up of well-functioning urban environments and a flourishing, zero-carbon region that is founded on Te Tiriti o Waitangi and realised through the tino rangatiratanga of tangata whenua.



Question 1: Do you support our vision and strategic direction that guides the draft Future Development Strategy?

Support

Don't support

Unsure

Tell us why...

The key words for our organisation in this vision are "responsible ancestors" and

"growth that is sustainable" "founded on Te Tiriti o Waitangi". These words speak

to the values we all aspire to, with development putting Te Taio and Te Mana o te Wai

at the centre of future development rather than being secondary to economic

expediency. We feel, however, that this draft strategy is very much envisaging growth

of the built environment which unfortunately will come at considerable cost to the natural environment. The Onepoto and Pāuatahanui arms of Te Awarua Porirua Harbour are living testimony to the damaging impacts of human development. Growth of the extent envisaged will inevitably result in further damage to Te Taio.

QUESTION 2: OUR PLAN FOR WHERE WE DEVELOP HOUSING OVER THE NEXT 30 YEARS AS OUR REGION GROWS.

What are we proposing?

We're providing for affordable housing that meets our diverse needs, and for compact, well-designed towns and cities. We're proposing to concentrate most of our housing development in existing urban areas and rural towns with good current and future transport links that function well now or will be improved through future transport developments (known as "strategic transport networks").

Why are we proposing this?

These proposals will help address our current and future housing needs as our population grows over time as well as for people in our region to live low carbon lifestyles and get around easily. Concentrating housing development in urban centres ensures we protect our natural areas and food production land from encroachment.



Question 2: Do you support our proposal to prioritise **housing development** in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

Support

Don't support

Unsure

Tell us why...

With the proviso that we believe the emphasis must be very much on current transport routes and hubs rather than future transport routes. The Wellington region is blessed with a great spine of road and rail routes in particular. Brownfields housing development around enhanced existing hubs and routes is the way to go rather than continuing to expand into precious greenfields areas. This is especially the case in our own city of Porirua where remaining greenfields space is hilly and hazardous in terms of building as per the key constraints page 66 of the main report.

QUESTION 3: OUR PLAN FOR WHERE WE DEVELOP BUSINESS LAND OVER THE NEXT 30 YEARS AS OUR REGION GROWS.

What are we proposing?

We're proposing to concentrate most of our business development in existing urban areas and rural towns with transport links that function well now or will be improved through future transport developments (known as 'strategic transport networks').

Why are we proposing this?

This proposal helps support productive, and sustainable local employment. A growing region means that there will be more people seeking employment here. While the Future Development Strategy cannot require growth in business and employment activity (i.e. more jobs or more businesses), it can support this by making sure that the regulatory settings and infrastructure that is required for businesses to flourish is in place at the right time.



Question 3: Do you support our proposal to prioritise **business development** in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

Support

Don't support

X Unsure

Tell us why...

We generally support prioritising business development in existing towns and cities but believe that depending on the type of business development that proximity to transport should not necessarily be the primary determining factor. For instance, we have strong reservations about industrial development on the Judgeford Flats area which is a very sensitive catchment in terms of health of the Pāuatahanui Inlet. We would like to see business development confined to commercial or light industrial in this area, to avoid further potential damage to the Inlet through contaminant run-off, whether by accident or inability to design sufficient anti-pollution measures.

QUESTION 4: OUR PLAN FOR KEY INFRASTRUCTURE TO SUPPORT DEVELOPMENT IN OUR REGION..

What are we proposing?

Our proposed approach is to maximise use of current and planned infrastructure in the most efficient ways possible to get the best from our infrastructure investments. This includes providing the infrastructure we need such as stormwater, wastewater, drinking water, road, rail, cycleways, electricity and social infrastructure such as schools and hospitals in the most well-functioning and cost-efficient ways possible. It also includes fully unlocking the development potential of our current and future strategic public transport corridors.

Why are we proposing this?

We want to ensure that our infrastructure meets the needs of our diverse and growing population, supports housing, business and well-functioning urban environments, and is as cost-efficient as possible. We are proposing that infrastructure planning and development planning are undertaken together, to improve efficiencies and leverage co-investment opportunities with the public and private sector. We are looking for ways to speed up infrastructure required to enable us to meet our strategic direction, faster whilst being fiscally responsible.



Question 4: Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

Support

Don't support

Unsure

Tell us why...

We have provided our view on transport infrastructure in question 2 above. We

particularly want to emphasise the need for three waters infrastructure to be planned

alongside if not ahead of development planning. No residential or business

developments should be approved without sign off by the relevant territorial local

authority that sufficient system-wide infrastructure capacity is ready and available to cater

for the new connections as they come on stream.

QUESTION 5: OUR PLAN FOR WHERE TO LIMIT OR AVOID DEVELOPMENT IN OUR REGION.

What are we proposing?

We're protecting what we love. Our region is subject to various constraints on development and contains areas with precious values we are proposing to protect by limiting or avoiding development in these areas. This includes extensive measures to protect our environment and water supply areas along the central mountainous spine between Wairarapa and the rest of the region, and the various natural hazard risks which the region is subject to and sites of cultural importance to Māori in our region.

Why are we proposing this?

Our proposed plan ensures communities are safer from significant natural hazards and are becoming more climate resilient, and regional growth also avoids creating new risks. It ensures urban development is designed to minimise impacts on the natural environment, our food producing areas and our rich cultural heritage.



Question 4:

Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

Support

Don't support

Unsure

Tell us why...

This must be an absolute. Taonga such as our streams and harbours have suffered degradation since the arrival of European settlers in the 1840s. Future development must be designed to avoid any further negative impacts on the natural environment and contribute to its protection and sustainability. This is especially required as we move further into the effects of climate change. Existing areas subject to flooding and inundation through rising sea levels will require costly adaptation whereas new development in climate effect prone areas must be avoided.

QUESTION 6: REFLECTING IWI AND HAPŪ VALUES AND ASPIRATIONS

What are we proposing?

Te Tirohanga Whakamua is a statement of iwi and hapū values and aspirations for urban development in our Region. It was created by WRLC iwi members and has informed the development of our draft strategy. Some values and aspirations expressed within it that go beyond the scope of the draft strategy and will likely be captured by other work programmes. Well-functioning urban environments need to enable Māori to express their cultural traditions and norms. We'd like to hear from both mana whenua and from other Māori in our region on how we can best support their diverse values and aspirations for urban development.

Why are we proposing this?

Supporting values and aspirations set out in Te Tirohanga Whakamua is vital to realising the Future Development Strategy's vision of a region founded on Te Tiriti o Waitangi and realised through the tino rangatiratanga of tangata whenua. A significant number of Māori living in our region do not have whakapapa links here. It's important that we also hear the views of these individuals and groups on our proposals for the future of our region through the Future Development Strategy.



Question 6: How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

Tell us why...

We fully support Te Tirohanga Whakamua, particularly Pou 4 Kaitiakitanga: Growth in our region supports thriving life and abundant life". Also Kokiri 2: Towards a circular approach and development informed by nature based solutions wherever possible and Kokiri 3: When planning for growth the environment comes first and growth should only occur where it creates positive environmental outcomes and in tune with nature and the bio-diversity of the region. Where values and aspirations go beyond the scope of the draft strategy the suggestion above that "they will likely be captured by other work programmes" is too tentative. The word "likely" should be changed to "will".

QUESTION 7: WHAT ELSE IS IMPORTANT TO YOU?

Do you have any other feedback on the draft Future Development Strategy?

Tell us more...

We are sceptical of the need to plan for 200K more people in the next 30 years and think that providing double the housing capacity required is completely over the top.

We prefer the NZ Stats forecast of 79K or suggest a figure of 100K would be sufficiently as a target to plan for, with new dwelling numbers commensurately lower e.g. 60,000.

We note that on page 40 of the document the table for the first ten years of development suggests that the NGA of Porirua

greenfields development will yield 2500 homes, second only in size to Tara Ika in Levin and 50 homes more than the Lets Get Moving corridor in Wellington city.

We caution against such intensive greenfields development of hilly and erosion prone land where heavy sediment flows have already compromised the health of the

Pāuatahanui Inlet.

Need more room? You can add more pages.

For any questions, please email future.developmentstrategy@wrlc.org.nz



wrlc.org.nz

Parvati Rotherham

From: futuredevelopmentstrategy
Sent: Thursday, 9 November 2023 4:48 pm
To: James Barber; futuredevelopmentstrategy
Subject: RE: Submission on FDS

Hi James,

Thanks for your submission this email confirms receipt and we'll review the submission in more detail over the coming week and be in touch to arrange speaking times for those wishing to be heard.

Thanks
Parvati

From: James Barber [REDACTED] >
Sent: Wednesday, November 8, 2023 9:40 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Submission on FDS

Kia ora

This is my submission on the Future Development Strategy.

James Barber

[REDACTED]
[REDACTED] Newtown, Pōneke Wellington

I am submitting as an individual

Q1: vision and strategic direction

I support the vision and strategic direction but especially the Mana Whenua statement of values and aspirations because it's a very basic start. The direction should have prioritised or weighted objectives, particularly equity and emissions reduction, so it was able to start inducing a paradigm shift in how we manage urban development.

Q2: Our plan for where we develop housing...

I do not support the proposal because it is not strong enough. I wish to see the FDS enforce either a ban on greenfields development or a decision not to subsidize these developments through building the infrastructure. Councils are already feeling massive financial burdens and limited funds are better directed at allowing intensification rather than more urban sprawl.

Further greenfields developments will also compromise the ability to reach climate crisis goals as it will lock in people needing to drive everywhere from deepest darkest suburbia.

Q4: key infrastructure...

I do not support the proposal because it is not strong enough.

Q5: limit or avoid development...

I do not support this proposal as it seems unlikely that public subsidy will be withdrawn for slated greenfield areas. If it were to be, I would support this proposal.

Q6: iwi and hapu values and aspirations

I support these and the FDS would do well to take on their ambition.

Q7: what else is important:

We have an opportunity to have a genuinely future focused plan. This will have to be one where densification is chosen over urban sprawl. Cities need to be planned with walkable catchments which allow people access to everything they need on a day to day basis within walking distance.

As a parent a focus on creating 10 minute cities would make life so much easier in so many ways.

Please do everything possible to help create a plan which chooses liveable cities over suburban sprawl. These easiest way to do this is to stop urban sprawl through either a ban on greenfields development or a decision not to subsidize such developments.



**INVEST IN
TEACHERS**
**INVEST IN
AOTEAROA**

Parvati Rotherham

From: futuredevelopmentstrategy
Sent: Thursday, 9 November 2023 4:50 pm
To: Chris Peterson; futuredevelopmentstrategy
Subject: RE: SUBMISSION ON REGIONAL GROWTH PLAN

Kia ora Chris,

Thanks for your submission this email confirms receipt and we'll review the submission in more detail over the coming week and be in touch to arrange speaking times for those wishing to be heard.

Thanks
 Parvati

From: Chris Peterson <[REDACTED]>
Sent: Wednesday, November 8, 2023 3:21 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: SUBMISSION ON REGIONAL GROWTH PLAN

SUBMISSION ON REGIONAL GROWTH PLAN

This draft Regional Growth Plan is an impressive document and I'm sure quite in line with the requirements of the Government's NPS-UD which called for it.

But the Government also has the Zero Carbon Act that requires the country to be at net zero emissions by 2050. Which is over almost exactly the same time period as the Growth Plan.

The Plan well reflects the necessity to decarbonize our economy and lifestyles in incorporating concepts like urban intensification, centralization around public transport hubs, cycling and walking, green spaces etc.

But are these two major policies, that will together be such large determinants of exactly how we develop over the next 30 years and beyond, truly in sync with each other? And if there is any potential discrepancy between them which will take precedence? For me that is a fundamentally important question - albeit a very difficult one.

Growth as an unavoidable imperative for a healthy economy is an unquestioned assumption and starting point for many. Any negative environmental consequences from that growth can be mitigated, it is said, through technological innovation and enlightened policy. By decoupling them. Growth then can be good growth - Green Growth - and all will be well, a healthy economy in a healthy environment.

But it seems a growing number of reputable economists, leading academics and others are increasingly questioning whether this Green Growth path is really even possible. A major reason being the impossibility of having sufficient energy, minerals and other resources to build all the infrastructure necessary for the huge transition involved in moving from a fossil-fuel based world to one based around renewable energy and for the electrification of almost everything. Central to this argument is the diminishing EROEI, the Energy Returned On the Energy Invested, associated with our remaining sources of fossil fuels. More energy is needed just to get fuels from fracking than from the early gushers where little pumping was even required. So substantially, and possibly impossibly more, energy is required just to get the energy that can be usefully employed.

The only viable option these critics argue is Degrowth in some shape or form and to some greater or lesser degree. Two conferences on Degrowth have now been held at the EU and it has received mention from the IPCC. So it is a credible idea deserving of consideration.

Growth of itself also makes the already immensely demanding process of decarbonization even more difficult. The IPCC's Special Report in 2018 clearly stated that humanity had to decrease emissions by 8% year-on-year over the decade to 2030 to have an even 50% chance of remaining within that important 1.5 degrees of warming. And that was if we started in 2020! But we didn't and that number goes up with each passing year to ever more-daunting levels. Subsequent IPCC reports (AR6 in 2022 and its synthesis report in 2023) reinforce this.

Moreover it also goes up as the population increases. And in the building of homes to house that increasing population. Apparently BRANZ determined that our construction sector would need to decarbonize its typical stand-alone house construction by some 85% to remain in the 1.5 degree realm.

Degrowth, too, may well not be ours to choose. Rather it may, through a warming climate and deteriorating environment, be forced on us as we are required more and more to move towards living within planetary boundaries.

None of this is to suggest ditching the Plan as presented. Just to acknowledge the inherent difficulties with even green growth and to build into it some flexibility and ability to change with changing circumstances. Even more importantly to state its relationship with the ZCA and place it second in line to that net zero commitment.

Finally, a great first step might be to change the title of the plan from 'Regional GROWTH Plan' (which really does give the game away!) to something like 'Regional Development Plan'.

Would like to be heard if possible - in Masterton.

Chris Peterson

██████████



Wellington Regional leadership Committee Secretariat
 C/o Future Development Strategy Lead
 PO Box 11646
 Wellington 6011

By email: future.developmentstrategy@wrlc.org.nz

Kia ora,

Draft Future Development Strategy - Submission by CentrePort Limited

Thank you for the opportunity to provide feedback on the Draft Future Development Strategy (draft FDS). The following submission addresses the key questions we believe are relevant to CentrePort.

Question 1: Do you support our **vision and strategic direction** that guides the draft FDS?

- We support the overall vision and direction, subject to the comments below.

Question 3: Do you support our proposal to prioritise **business development** in our existing towns and cities and around our strategic public transport network i.e. around current and future transport hubs and routes to provide for sustainable local employment?

- We acknowledge and support the industrial land study underway.
- We support the proposed prioritization approach, in particular identification of Waingawa Industrial Estate as a Future Business Area (Diagram 11).
- We recommend that the Pipitea/Kaiwharawhara industrial area adjacent to the port be identified in Diagram 9 as a priority area given the current key strategic function of this area and the planned development of a Multi User Ferry Precinct.

Question 4: Do you support our proposed approach to invest in **infrastructure** that is located in existing towns and cities and around transport hubs and routes?

- We support the proposed infrastructure investment approach, subject to the following comments.
- We recommend that greater emphasis be given to improving resilience and capacity of existing infrastructure (not just efficiency) particularly where it is of regional and national significance such as the port.
- Given current and planned investment in the port (including Cook Strait ferry facilities) we recommend that consideration be given to including the port in Diagram 19 (sites of major infrastructure identified in council LTPs over the first decade of the FDS) and Diagram 20 (regional strategic transport network).

- We believe the draft FDS should also include pathways for co-investment into infrastructure upgrades where there are multiple beneficiaries (e.g. electricity and water). This is particularly important as we decarbonize the port and supply chain.

Question 5: Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that are prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

- We note that all coastal and harbour areas are identified as constrained (Diagram 5 – Wāhi Toitū). While we accept this in principle, we believe recognition should be made of the locational constraints of the port (and associated commercial areas) as well as navigational requirements in Wellington Harbour. It is important that this essential existing infrastructure and the ability to increase port capacity in response to population and business growth is protected.

Thank you again for the opportunity to comment on the draft FDS. We wish to attend a hearing in support of this submission.

The contact regarding this submission is William Woods (Strategic Planning Manager) at



CentrePort's postal address is PO Box 794, Wellington 6140.

Naku noa, na

A handwritten signature in black ink, appearing to read 'Anthony Delaney'.

Anthony Delaney
Chief Executive

9/11/2023

Wellington Regional Leadership Committee Secretariat
Via email: future.developmentstrategy@wrlc.org.nz

Tēnā koe,

Submission on the Consultation Draft Future Development Strategy 2023 – 2053 for the Wellington Regional Leadership Committee

1. Thank you for the opportunity to provide feedback on the draft Future Development Strategy (the draft Strategy). The following sets out the New Zealand Transport Agency (Waka Kotahi) position in relation to the draft Strategy and identifies some potential areas of improvement. We look forward to continuing to partner with the Wellington Regional Leadership Committee (the Committee) to achieve our joint goals.

Overview of submission by Waka Kotahi

2. Overall, Waka Kotahi supports the draft strategy. We note the draft Strategy builds on the direction of the Wellington Regional Growth Framework and makes notable improvements, such as clearer spatial priorities and phasing for growth that will assist with achieving better integration between land use and transport.
3. A summary of our key points:
 - a. Waka Kotahi supports:
 - i. The overall vision and strategic direction outlined in the draft Strategy
 - ii. The inclusion of a prioritisation framework, including spatially identifying priority areas for development
 - iii. The inclusion of Te Tirohanga Whakamua.
 - b. Waka Kotahi suggests several areas where the draft strategy can be strengthened:
 - i. Recognition of the uncertainty about Wellington's growth and how the draft Strategy manages the resulting risks
 - ii. Reconsideration of the distribution of growth, particularly the share of future growth signalled in the Hutt Valley
 - iii. Inclusion of more information about the infrastructure needed to support growth and deliver the outcomes sought by the draft Strategy.

Waka Kotahi role in the Wellington Regional Leadership Committee and development of the Future Development Strategy

4. Waka Kotahi is an observer organisation in the Committee and an active participant in the development of the draft Strategy. The role of Waka Kotahi as a provider of regionally significant

infrastructure is to provide input and feedback, and to work with the region to coordinate and align the implementation of the strategy with delivery of transport improvements.

Change of Government

5. We note that at the time of consultation on the draft Strategy a change of government is expected following the general election held on October 14. There is currently uncertainty about the extent to which a new government may continue to progress with existing policies, programmes, and projects which could affect initiatives currently included in the draft Strategy. We encourage the Committee to consider any changes that may be necessary to reflect the direction of the new government and to update the draft Strategy if there is opportunity to do so before it is finalised.

Waka Kotahi role and interest in urban development and integrated land use and transport planning

6. Waka Kotahi supports an integrated approach to transport planning, investment, and delivery. Our statutory obligation is to undertake our function in a way that contributes to an affordable, integrated, safe, responsive, and sustainable land transport system whilst giving effect to the strategic investment priorities and transport outcomes set by the Government through the Government Policy Statement on land transport (GPS).
7. The current GPS 2021 has four strategic priorities:
 - **Safety** – developing a transport system where no-one is killed or seriously injured.
 - **Better travel options** – providing people with better transport options to access social and economic opportunities.
 - **Improving freight connections** – for economic development.
 - **Climate change** – developing a low-carbon transport system that supports emission reductions, while improving safety and inclusive access.
8. The GPS will be refreshed for 2024. Although, it has not been finalised, the Ministry of Transport has recently consulted on a draft GPS 2024. The draft GPS24 includes six strategic priorities to set direction for the transport system:
 - **Maintaining and operating the system:** the condition of the existing network is efficiently maintained at a level that meets the current and future needs of users.
 - **Increasing resilience:** the transport system is better able to cope with natural and anthropogenic hazards.
 - **Reducing emissions:** transitioning to a lower carbon system.
 - **Safety:** transport is made substantially safer for all.
 - **Sustainable urban and regional development:** people can readily access social, cultural, and economic opportunities through a variety of transport options. Sustainable urban and regional development is focused on increasing housing supply, choice, and affordability, and developing resilient and productive towns and cities through effective

transport networks that provide a range of low-emission transport option and low congestion.

- **Integrated freight system:** well-designed and operated transport corridors and hubs that provide efficient, reliable, resilient, multi-modal, and low-carbon connections to support productive economic activity.
9. The Emission Reduction Plan/Te hau mārohi ki anamata (ERP) sets out a pathway to an approximate 41% reduction (on 2019 levels) in New Zealand's carbon emissions by 2035. Transport is expected to play a crucial role in meeting this target. The ERP acknowledges the importance of land use and transport integration in reducing emissions.
 10. To deliver on Government outcomes, including those set by the GPS, Emission Reduction Plan, and the Transport Outcomes Framework, Waka Kotahi has developed strategies relevant to the Future Development Strategy. These include Arataki – our 30 Year Plan, Toitū Te Taiao (sustainability action plan) and our Board-endorsed urban development position statement:

“Waka Kotahi actively supports, enables and encourages quality, mixed-use, compact urban development that efficiently uses land, reduces travel distances and lowers reliance on private vehicles to enhance people’s lives”
 11. The above Policies, Plans and position form the foundation for Waka Kotahi feedback on the draft Strategy.

General Feedback

12. Waka Kotahi commends the Committee on the work done in developing the draft Strategy. It makes significant improvements on its predecessor, the Wellington Regional Growth Framework, and provides a useful framework to support achieving integrated land use and transport outcomes. We are pleased to see the alignment with the strategic priorities of the GPS, and in particular the focus placed on improving safety, reducing emissions, increasing mode shift, and improving journeys for freight.
13. The Future Development Strategy forms the basis for integrated, strategic, and long-term planning. A high-quality FDS is an important tool to help our organisations achieve the objectives of the GPS, and to enable our organisations to realise our urban form, mode shift, and transport emissions reduction goals.
14. Waka Kotahi encourages the Committee to continue with the direction signalled in the draft Strategy, and to consider ways in which it can support and incentivise growth in the priority areas identified. We support the draft Strategy; however, we provide some more specific feedback below that we hope is considered in finalising the document.

Vision and Strategic Direction

15. Waka Kotahi supports the vision and strategic direction outlined in the draft Strategy, summarised in Diagram 2. The vision and direction align with Waka Kotahi interest and role in urban development and are supportive of integrated land-use and transport planning.

Prioritisation framework

16. We support the introduction of a prioritisation framework into the draft Strategy, being the criteria outlined in diagram 7 and the associated series of maps that spatially define the priorities for growth in diagrams 9-11. We consider the direction signalled by the prioritisation framework aligns with our urban development position and supports integrated planning as outlined in the Waka Kotahi intervention hierarchy, in particular:
- a. areas which have good access to the strategic public transport network with good access to employment, education, and active mode connections
 - b. Development areas within existing rural towns around current and proposed public transport nodes and strategic active mode connections.
17. For clarity, our support for the prioritisation framework should not be implied as support (or not) for any individual priority area identified in diagrams 9-11. Investment in the transport system that may be required to support these areas will be subject to the independent decision-making process of the Waka Kotahi Board in relation to specific future interventions and proposals.

Te Tirohanga Whakamua

18. We support the inclusion of Te Tirohanga Whakamua in the draft Strategy and the alignment with community values, housing and business needs and national policy direction.

Uncertainty about Wellington's future growth

19. We support the inclusion of the content in the 'how much growth to expect' text box on page 33. This recognises the uncertainty of future growth predications, noting the considerable difference between the Wellington Region's bespoke population projections (Sense Partners) and the sub-national population projections by Statistics New Zealand (StatsNZ) because of different assumptions about long-term net-migration.
20. Waka Kotahi agrees there is uncertainty about how much and where the Wellington Region will grow, in particular:
- a. Achieving the amount of growth assumed by the draft Strategy relies on sustained high levels of positive net-migration. While future migration is difficult to predict, historically net-migration to New Zealand and Wellington fluctuates significantly over the long term and includes periods of negative net-migration.
 - b. Recent changes to make the planning system more enabling and responsive to growth, such as the National Policy Statement on Urban Development 2020 and the Medium Density Residential Standard have significantly increased the opportunities for development across the Wellington Region. The 2023 Housing and Business Capacity Assessment concludes Wellington and Horowhenua is estimated to have realisable development capacity¹ for 206,613 dwellings, which significantly exceeds expected demand over the next 30 years under either Sense Partners or StatsNZ projections. The

¹ Realisable development capacity is an assessment of the most likely type of development to occur on a site given planning regulations, commercial feasibility and risk to a developer

scale of difference between supply and demand means there are many possibilities for where growth could occur and how the market responds to this change is not yet clear.

21. While we support the intent of the draft Strategy to provide clearer prioritisation and phasing of future growth, we consider the 'distribution of development' implies a questionable level of certainty about where the region will grow. The draft Strategy notes that it will include prioritisation and sequencing of new growth areas and investments to address this uncertainty. We support clear sequencing and staging as method to address uncertainty but consider this approach could be applied further throughout the draft Strategy, including by more clearly identifying the dependency between infrastructure requirements and the growth areas identified.
22. We recommend that actions should be included in the implementation plan to help manage the risks from uncertainty about growth. These could include:
 - a. Presenting development as staged and sequenced tranches, with the timing of when areas are enabled being based on when development opportunities are taken up by the market.
 - b. Moving towards the use of scenario-based planning as the land-use assumptions for planning work and major investments, rather than use a single growth forecast.
 - c. Using trigger points / thresholds to identify when infrastructure investment and other interventions are required relative to when growth is occurring.
 - d. Improving monitoring of development and growth trends, including developing a greater understanding of regional housing preferences.

Distribution of growth – Hutt Valley

23. The distribution of development in the draft Strategy (diagram 14) suggests the Hutt Valley will accommodate 19% of the region's growth over the next 30 years. When compared to what growth has occurred over the last decade, this is a notable decrease in the share of the region's growth. It is also lower than what is projected by both Statistics New Zealand and Sense Partners over the next 30 years (all approx. 30%).
24. The draft Strategy does not explain why the Hutt Valley's share of growth is expected to decrease, but we note the distribution of development appears to be influenced by the planned supply of new greenfield developments in the first decade and assumes there will be high levels of uptake in these developments by the market. We question this approach given:
 - a. A key trend of the Wellington Region's growth over the past decade has been the rapid growth of the Hutt Valley, particularly in Lower Hutt which has seen high levels of development of terraced house, flats and units close to the Hutt Line where the planning framework has enabled this. The market has demonstrated strong demand for housing in the Hutt Valley.
 - b. Recent changes to the planning system have significantly increased development opportunities in Wellington and the Hutt Valley, particularly around rail stations. Auckland's experience since the Unitary Plan (which had a similar impact on

development opportunities) has been that growth is occurring faster than expected in central areas with good access and slower in greenfield areas at the fringe of the urban area. A similar response by the market in Wellington would disrupt the distribution of growth suggested by the draft Future Development Strategy.

25. Given these trends, we question whether the distribution of development is underestimating the share of the region's growth that is likely to occur in the Hutt Valley and overestimating growth elsewhere. We seek that further evidence and analysis of demand informs the distribution of growth, and that consideration be given to the draft Strategy reflecting a higher share of growth occurring in the Hutt Valley.

Infrastructure to support development

26. The draft Strategy highlights the importance of infrastructure and integrated land use and infrastructure planning for achieving the vision, strategic direction and outcomes.
27. While section 3 and associated appendices provides a high-level overview of strategic issues and challenges facing infrastructure provision, we consider that more specific detail on the infrastructure requirements to support growth is needed to increase confidence in the ability to deliver the draft Strategy.
28. We recommend the infrastructure section of the draft Strategy is reformatted and further detail is provided so that it clearly demonstrates:
 - a. the infrastructure requirements for each of the FDS priority areas (identified in diagrams 8-11) and whether these are known, funded, or planned, including clearly identifying if a funding or knowledge gap exists.
 - b. a clear picture of all regional infrastructure networks including the pipeline of projects and investment needed to support future growth. We note that diagram 20 illustrates future investment for the strategic public transport network, but similar diagrams for all other infrastructure types are not included.
29. The lack of information on future three waters infrastructure requirements needed to support growth is a significant concern to Waka Kotahi. Water capacity is critical 'lead infrastructure' that is a prerequisite to any growth occurring, and therefore a clear understanding of requirements is important to provide confidence that growth can occur in the priority areas identified by the draft Strategy. We seek that further information on three waters infrastructure requirements is included if available, and that further analysis of three waters requirements is identified as a high priority action in the implementation plan.
30. We also suggest that the draft Strategy should note that the infrastructure requirements for all FDS priority areas are not fully understood, including the cost implications, and there may be a need for these to be reconsidered or reprioritised if the infrastructure costs are found to be unaffordable once further planning and investigation has occurred.

Conclusion

31. Thank you for the opportunity to provide feedback and we look forward to continuing to partner with Committee to deliver on our shared aspirations for the Wellington Region.

Ngā mihi,



Nick Gibbons

Manager, Spatial System Planning



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**SUBMISSION ON DRAFT WAIRARAPA-WELLINGTON-HOROWHENUA
FUTURE DEVELOPMENT STRATEGY**

TO: Wellington Regional Leadership Committee ("**Committee**")

SUBMITTER: Summerset Group Holdings Limited ("**Summerset**")

SUBMISSION ON: Draft Wairarapa-Wellington-Horowhenua Future
Development Strategy ("**Draft FDS**")

Background and summary

1. Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 7,400 residents living in our village communities, offering a range of independent living options and care, meaning that as residents' needs change, they have support and options within the village. Summerset has 39 villages which are either completed or in development and a further 11 greenfield sites, spanning from Whangārei to Dunedin, employing more than 2,400 people across its villages. Summerset has 7 villages at varying stages of development across the Wairarapa, Wellington and Horowhenua areas.
2. Summerset welcomes the opportunity to submit on the Draft FDS. Due to Summerset's active involvement in land development (including resource consent and private plan change processes) nationwide, it is highly familiar with the subject matter of the Draft FDS. A high quality FDS has the potential to be transformational in supporting long term growth for the Greater Wellington region and Horowhenua. Conversely, a poorly prepared FDS will have the opposite effect and risks constraining growth and leading to poor planning outcomes.
3. Summerset supports the broad direction in the Draft FDS to significantly increase housing capacity, but is concerned there is too much reliance placed on intensification to achieve this.

Key statutory requirements

4. The National Policy Statement on Urban Development ("**NPS-UD**") provides the legal basis for preparing the Draft FDS.¹ The Draft FDS must be prepared every 6 years and in time to inform, or at the same time as, the next long-term plans.²
5. The purpose of the Draft FDS is to promote long-term strategic planning by setting out how councils intend to achieve well-functioning urban environments in both its existing and future urban areas, and provide sufficient development capacity as required by the NPS-UD over the next 30 years. The FDS is also intended to assist the integration of planning decisions under the Resource Management Act 1991 ("**RMA**") with infrastructure planning and funding decisions.³
6. The NPS-UD sets out a prescriptive criterion of sources of information that must be considered in informing the Draft FDS. This includes:
 - (a) the most recent applicable Housing and Business Development Capacity Assessment ("**HBA**");
 - (b) consideration of different spatial scenarios for achieving the purposes of the FDS;
 - (c) relevant long-term plans;
 - (d) infrastructure strategies or any other relevant plan or strategy;
 - (e) the feedback received from this consultation;
 - (f) every National Policy Statement; and
 - (g) any other relevant national policy required or issued under legislation.⁴
7. Once an FDS is prepared, the Council will be required to have regard to it when preparing or changing RMA planning documents.⁵ On that basis it has the potential to significantly influence RMA decision making processes.
8. The primary reason for, and fundamental direction of the NPS-UD, is to address the issue of insufficient appropriately zoned land to meet housing and business development demand. In light of that purpose, the NPS-UD's first and overarching concept is to provide for well-functioning urban environments, which enable a variety of homes that meet communities'

¹ NPS-UD, clause 3.12.

² NPS-UD, clause 3.12(1).

³ NPS-UD, clause 3.13(1).

⁴ NPS-UD, clause 3.14.

⁵ NPS-UD, clause 3.17.

needs, as well as enable a variety of sites that are suitable for different business sectors, among other things. Summerset considers this is fundamental to the application of the NPS-UD, as it indicates that the NPS-UD is not intended to be incorporated into plans in a blunt manner. Rather, regard must be had to nuances of specific environments, including the appropriate type, scale and location of housing, depending on the particular context.

Future growth will not be able to be supported through intensification

9. A significant amount of growth is anticipated in the Greater Wellington region and Horowhenua in the next 30 years.⁶ The growth will not only require an increase in housing capacity, but also the necessary infrastructure and services to support these developments.
10. The Draft FDS greatly limits the areas identified as appropriate for development and largely relies on infill to achieve this development capacity, with uplift from implementation of the Medium Density Residential Standards and associated Intensification Planning Instruments ("IPIs").⁷
11. By increasing the reliance on infill developments through the Draft FDS, the Committee has placed far too much reliance on the capacity of brownfield areas alone to provide sufficient long-term development capacity, as is required under the NPS-UD. Perversely, if the FDS is confirmed before relevant IPIs are finalised, any IPIs that are not finalised will be required to have regard to the Draft FDS as currently proposed, perpetuating poor development outcomes. The change of government is likely to result in an imminent change to the way in which Councils should provide for growth. The FDS should reflect that imminent policy change.
12. Summerset is a strong supporter of efficient use of land, and the significant environmental and housing affordability benefits that can be realised through intensification. However, not all urban land uses can be appropriately provided for through infill. Even residential land uses can vary significantly in terms of lot sizes, topography, and density. It is important that housing options are available that meet a range of needs, including elderly or those with disabilities.
13. Comprehensive care retirement villages by their nature need to provide a range of aged care housing options and on-site amenities to meet the changing needs of residents as they age (as part of the continuum of care approach). Typically housing typologies are one-story to provide good accessibility, and require space for supporting services, outdoor areas and recreational activities. Due to these requirements, retirement villages require larger sites, which are not readily available through brownfield development. While retirement villages typically require greenfield sites, they do not contribute to the adverse effects of greenfield

⁶ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, page 5.

⁷ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, pages 40-41.

development in the same manner that other more typical subdivisions in fringe rural areas might otherwise do. For example, retirement village residents do not place the same pressure on transport infrastructure during peak travel times.

14. Appropriate greenfield development can also have significant benefits, including by providing opportunities for integrated, master-planned developments that better utilise land for open space and community areas, active transport modes, and high quality, good practice engineering design that can future proof against the impacts of climate change and natural hazards.
15. The Draft FDS expressly recognises there is a significant shortfall of industrial land that is not proposed to be addressed, but rather dealt with as part of the next Future Development Strategy in 6 years' time.⁸ With commercial, residential, and industrial land uses competing for existing land supply through infill development, unless managed carefully this also contributes to reverse sensitivity effects, inflated land prices, and pressure on existing infrastructure.

Identification of urban areas requires more nuanced approach

16. The Draft FDS identified large areas of land as Wāhi Toitū (areas to be protected from new development) and Wāhi Toiora (areas that future development must be carefully managed to ensure values are protected, and risks mitigated).⁹ While Summerset supports a nuanced approach to land development within the Draft FDS through the identification of Wāhi Toitū/Wāhi Toiora areas, there appears to be substantial overlap between them.
17. Wāhi Toitū should be reserved for areas which are incapable of being developed (e.g. due to a significant natural hazard risk). The Draft FDS needs to contemplate that other areas may be appropriate for urban development if they contribute to well-functioning urban environments, avoid or manage any natural hazard risk, and infrastructure can be provided (for example, through private funding). The Draft FDS need to be flexible enough to respond to any opportunities to meet growth demand where these can be shown to be appropriate.
18. It is also unclear from the maps provided with the Draft FDS as to whether some areas fall within the existing urban zone or just outside it in a Wāhi Toitū/Wāhi Toiora area.¹⁰
19. Applying a more nuanced approach to the identification of urban growth areas will also provide more guidance for district councils as to the types of activities (residential, commercial, industrial) which should be located in areas and therefore inform future zoning decisions. The Draft FDS identified where urban land generally can/cannot be located, however it should also

⁸ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, page 44.

⁹ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, pages 29-31.

¹⁰ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, page 29.

be taking into consideration, at least at a high level, the compatibility of different land uses, and any challenges or benefits that may result from their co-location. This is essential to ensuring that development contributes to well-functioning urban environments under the NPS-UD.

20. As the Draft FDS is revised every 6 years, it needs to be flexible enough to be able to respond to changing growth pressures. This is so it will always facilitate future development even as the required future development evolves. Policy 8 of the NPS-UD is consistent with this approach. Policy 8 expressly recognises the need to be responsive to change, and be amenable to unanticipated or out-of-sequence developments that provide significant development capacity and contribute a well-functioning urban environment and are well-connected to transport corridors.¹¹
21. Private plan changes are supplementary tools to ensure planning frameworks remain flexible and responsive to the changing needs of communities and the environment over time (noting that under the RMA Councils are otherwise only mandated to review and update their plans every 10 years or in accordance with national direction). A well-prepared FDS should naturally limit the amount of "out-of-sequence" developments occurring, however the Draft FDS should not preclude "out-of-sequence" developments where it can be demonstrated that infrastructure servicing can be provided, they are privately funded, and they are contributing to well-funded urban environments.

Relief sought

22. Summerset:
 - (a) supports retention of areas already identified for urban development in the Draft FDS; and
 - (b) seeks amendments to the Draft FDS to:
 - (i) expand the areas identified for urban development to both provide a degree of contingency that infill cannot realistically deliver the required capacity to support growth and to address the identified shortfall in industrial land;
 - (ii) provide a clearer delineation between Wāhi Toitū/Wāhi Toiora areas;
 - (iii) limit the areas identified as Wāhi Toitū only to areas where development is incapable of being delivered; and

¹¹ National Policy Statement on Urban Development 2020 at [3.8].

- (iv) provide greater certainty as to the types of urban activities (eg residential, commercial, industrial) anticipated in broadly identified urban areas, including any additional areas identified as appropriate for urban development through the Draft FDS submission process.

Next steps

- 23. Summerset would be open to engaging further with the Committee on the matters raised in this submission if that would assist the Committee. If there is an opportunity to speak to the submission, Summerset would also be willing to do so.

Yours faithfully

A handwritten signature in blue ink, appearing to be "O. Boyd".

Oliver Boyd
National Development Manager



SUBMISSION:

Future Development Strategy – Draft September 2023

To Greater Wellington Regional Council

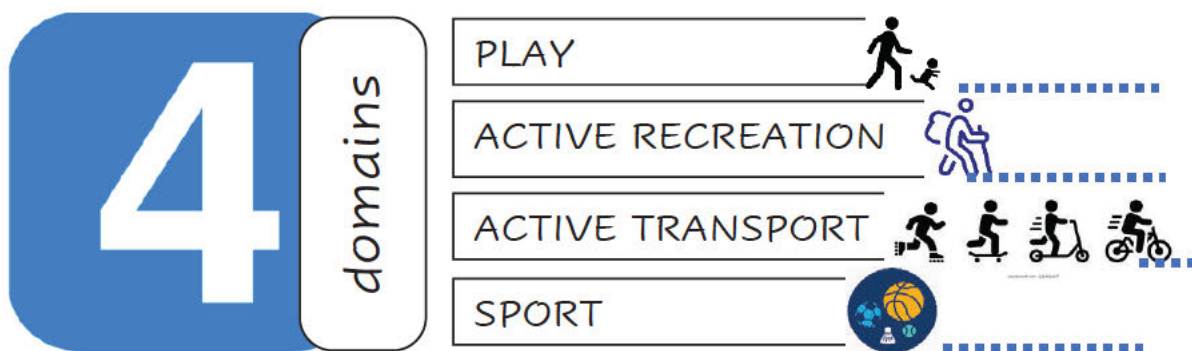
Thank you for the opportunity to submit Nuku Ora’s feedback on the draft Future Development Strategy.

Nuku Ora has a remit to lead and support the development of a robust regional physical activity system. Our strategic vision is Hauora: Everyone active, healthy, and happy. Our 12-year strategic outcome is for improved wellbeing through increased physical activity.

We have considered the draft strategy through a physical activity lens. This lens includes thinking about the extent to which proposals encourage and support communities to be physically active. There are well-documented benefits to individuals and communities from being active including benefits to physical and mental wellbeing, employment and educational achievement, improved social connectivity, and personal and social development. These all contribute to developing a happy and resilient community and go beyond just having access to housing or transport infrastructure and speaks to the quality of life that people can experience through good design of their communities.

We believe that currently the proposed development does not support physical activity as a means of living well within communities, and that there is an opportunity to reconsider this.

When we talk about physical activity, we are referring to any or all of its four domains (as shown in the diagram below). While all involve movement each domain has its own characteristics that makes it unique.



PLAY is a way of being physically active that allows children to experience fun, joy and laughter in a way that is important to them. It’s also where they develop and practice life skills. Play can take different forms. Play is an essential part of a happy and healthy childhood.

Value of play: We know that play improves the cognitive, physical, social, and emotional well-being of children and young people. Through play, children can develop their physical health and social skills, learn about the world and themselves, and learn skills they need for study, work and relationships.

ACTIVE RECREATION is physical activity that can be characterised as non-competitive physical activity for the purpose of wellbeing and enjoyment. It includes activities that occur in built, landscaped and natural environments (including outdoor recreation, fitness/exercise, community recreation, aquatics), which are undertaken by individuals and by groups, and occur with and without the involvement of a ‘provider’ group or organisation (that is, can be undertaken independently).

Value of active recreation: the nature of recreation activity invites teamwork and collaboration, leadership, self-efficacy enhancement, fun and enjoyment, resilience building, connect to the land and cultural history, and challenge - creating a unique learning and development opportunity.

SPORT is physical activity that can be characterised by formal organisation, competition and rules driven, organisation led and held to specific times and places. Generally, sport is governed by a set of rules or customs, which serve to ensure fair competition, and that aims to use, maintain, or improve physical ability and skills while providing enjoyment to participants and, in some cases, entertainment to spectators.

Value of sport: Sport can help promote physical activity for people of all ages and abilities. Through participating in sport participants can also develop their individual competencies in areas such as leadership, teamwork, goal setting while also realising their potential as athletes and individuals. Sport can be a key driver of tourism, employment, and infrastructure, and can also help in humanitarian programmes, fostering community development and social integration.

ACTIVE TRANSPORT includes any kind of transport where you are using physical activity to travel to and from a destination, including walking, cycling, scootering, and skateboarding.

Value of active transport: Physical activity can and should be integrated into the settings in which people live, work and play. Walking and cycling are key means of transportation and enable engagement in regular physical activity on a daily basis. Active forms of transport also provide a range of environmental benefits, including producing no air pollution, noise pollution or greenhouse gases.

Levels of physical activity across the region

Currently across our region there are high levels of participation but not high levels of physical activity. On any given week 391,125 (75%) people in the Wellington region participate in some form of physical activity. However, only 23% of adults participate enough to meet physical activity guideline thresholds set by the Ministry of Health. This means that a large proportion of the people living in the region do not participate often enough (or long enough) to experience the many benefits or value that being physically active provides. (Source: Sport NZ Active NZ survey).

Over the past five to 10 years there has been a gradual decline in participation in organised sport, especially by rangatahi. This means that community design needs to support other means of being active outside of organised sport which can be easily accessed and used.

Physical inactivity impacts our communities in many ways. Inactivity itself is only part of the issue – the real problem is the impact inactivity is having on our society as a whole. Physical inactivity negatively impacts the health, economy, environment and communities within our cities.

Population growth and participation trends

Population growth and demographic change within that growth is likely to affect participation demand and change the way we participate and/or are active.

Population growth is likely to increase demand for all spaces as a consequence of the general casualisation of participation away from organised, structured activity to ‘run arounds’ and social games and self-driven activity at a time and place that suits the individual. Access to spaces that can be used for physical activity becomes an important element in supporting those activity choices.

A growing active retiree population will drive demand for different offerings, as will the changing patterns of work. The changing make-up of the local and regional population may also increase demand for certain types of activity and facilities – both indoor and outdoor spaces. There is increasingly a societal expectation that community spaces support multi-use activities and facilitate meeting / socialising / gathering / connecting – which speaks to the enhancement of the physical activity experience. This will contribute to the expectations of greater quality of both the spaces and places and the activity options and offerings available.

Connected communities and accessibility

We know already that people want to live, work, and play closer to home while efforts to reduce the carbon footprint of sporting activities may mean that using distributed venues (rather than a central venue) and the notion of an inter-connected network of facilities (including built, open, and green space) with strong links to public transport that can be easily accessed would be desirable. This aligns to the concepts in the draft

strategy of growth corridors where opportunities are clustered around growth hubs. It also links to the localities concept focusing on meeting the needs of local communities within that community as far as possible.

A network approach to facility provision also implies connectivity via walkways and cycleways, or proximity to public transport that allows people to move from one place to another without requiring a car. Increasing active transport opportunities is a desirable way of creating opportunities to be physically active that integrate activity into daily lives. This is a proven way to increase the amount of physical activity that people do on a daily basis which, in turn brings about benefits to their physical and mental wellbeing. So, design and the application of active design principles becomes important.

Green and blue space and mental wellbeing

Having the opportunity to regularly recreate in/or near green and blue spaces has been proven to provide mental health benefits. Systematic reviews have revealed that increasing green space exposure could reduce the risk of depression, stress, and psychological distress and improve mood, emotional well-being, and mental health particularly in adolescents. Green space could reduce harmful exposures such as noise and air pollution in the neighbourhood and enhance psychological restoration, physical activity, social cohesion and sleep, which in turn lead to better mental well-being.

Active Cities

Nuku Ora would advocate for consideration of the Active Cities approach which is a global movement prioritising physical activity through the design of cities and towns in order to engage, maintain, and increase the number of citizens, regardless of age and ability, participating in physical activity.

The Active Cities movement is aligned to the World Health Organisation's (WHO) work on the Global Action Plan for Physical Activity and WHO's more recent advocacy for including physical activity across many policy areas because of the increasingly credible evidence of its value and contribution to many different aspects of people's lives.

We would ask that in the development of housing and transport infrastructure in particular that there is some consideration of how design can support people in those communities to live active lives in order to improve their overall wellbeing i.e. not just living in the houses provided but thriving in the community that has been created around the houses.

The diagram below summarises some of the evidence of the value of this approach.

fig 2 **THE BENEFITS ARE BIGGER THAN YOU THINK**



Concluding statement

Nuku Ora understands and supports the development of this strategy for the region. Our advocacy for using Active Cities to inform some of the thinking around the development of the region stems from the many examples we have seen where consideration of creating a supportive physical activity environment is an afterthought rather than integrated early in a development process.

Our work is informed by a community-led approach to the design, development, and implementation of programmes in order to create the best value for communities in terms of their wellbeing which we would expect would also be a desired outcome for this work. We are also increasingly aware of the importance of placemaking and support the principles outlined in Appendix Three. Space and place are important aspects of a physically active community.

We would be happy to discuss our submission further to talk about how provision for physical activity could be considered to maximise the opportunities provided through housing development and improved public transport offerings.

Nga mihi

Andrew Leslie

Chief Executive, Nuku Ora

██████████ ██████████)

Parvati Rotherham

From: futuredevelopmentstrategy
Sent: Thursday, 9 November 2023 4:43 pm
To: Felicity Wong; futuredevelopmentstrategy
Subject: RE: Submission on Draft FDS : Wellington's Character Charitable Trust

Hi Felicity,

Thanks for your submission this email confirms receipt and we'll review the submission in more detail over the coming week and be in touch to arrange speaking times for those wishing to be heard.

Thanks
 Parvati

-----Original Message-----

From: Felicity Wong [REDACTED]
Sent: Thursday, November 9, 2023 3:54 PM
To: futuredevelopmentstrategy <future.developmentstrategy@wrlc.org.nz>
Subject: Submission on Draft FDS : Wellington's Character Charitable Trust

- > A short submission on the Draft FDS follows from Wellington's Character Charitable Trust (WCCT):
- >
- > The map reproduced on pages 12 and 29 ("Wai Toitu Areas Protected from New Development") is not complete and accordingly is inaccurate.
- >
- > It omits an important area of current legal protection. The area of Motu Kairangi/Watts Peninsular/Miramar Peninsular is inaccurately omitted from the areas of protection (and thus appears to be an area of urban development).
- >
- > The area is currently protected as open space in the Wellington District Plan, and included as such in the "proposed district plan" on which submissions have been made.
- >
- > Hearings and decisions are yet to be made on those submissions about the site. It is a considerably large and significant area and it is inappropriate to proceed to adopt the map in advance of the planning decisions.
- >
- > There is no difficulty with the map on page 17 which correctly identifies the area as part of the "blue/green network".
- >
- > The Trust wishes to be heard on 11 Dec (and will join with Historic Places Wellington, the separate submission of which WCCT supports). There does not appear to have been a transparent process about the development of this map which did not include other local and key "stakeholders".
- >
- > Regards, and Nga mihi
- > Felicity Wong
- > WCCT Trustee
- > [REDACTED]
- > [REDACTED]
- >
- >
- > Sent from my iPhone

Submission Form

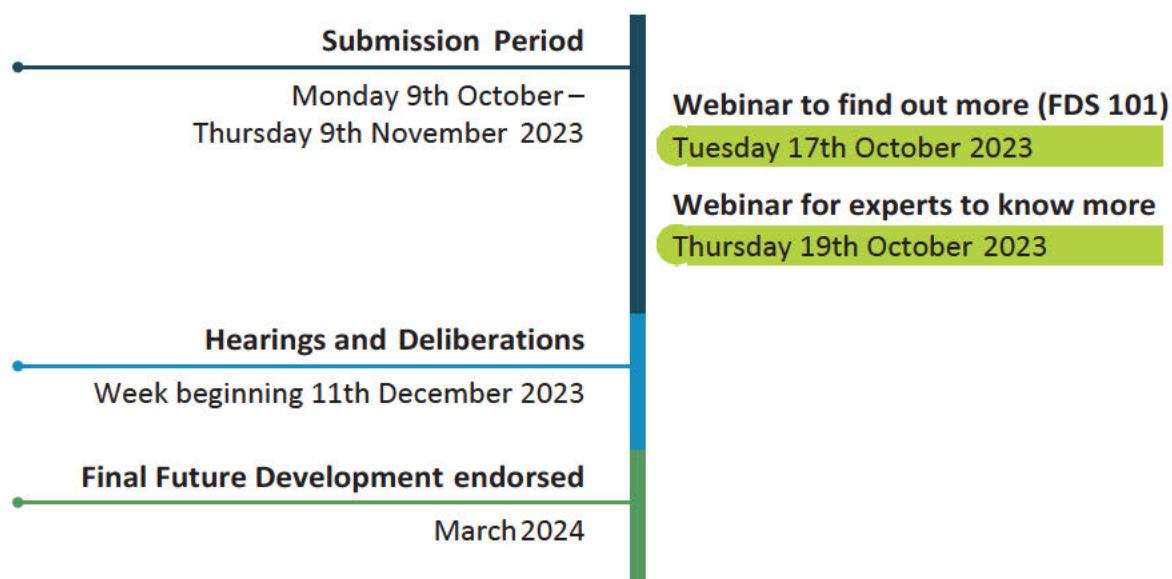
How you can have your say

- Our preference is for you to submit online by visiting: wrlc.org.nz/future-development-strategy
- If you want to fill in a paper form, please scan this form and email: future.developmentstrategy@wrlc.org.nz (ensuring “submission on FDS” is in the subject line.
- If post is the best option for you, please address to:
Wellington Regional Leadership Committee Secretariat
c/o Future Development Strategy Lead
PO Box 11646
Wellington 6011

Feedback must be received by no later than 5pm Thursday 9th November 2023

If you make a submission, you can also speak to the WRLC Hearings Subcommittee in support of your submission. You can indicate you would like to take part in the hearings process by ticking the appropriate box in the submission form. Hearings on the draft Future Development Strategy are scheduled to be held in the week beginning 11th December 2023.

Key dates



Your details³

Contact details

First Name: Michael

Last Name: Hall

Email address: [REDACTED]

Postal address: Level 1 / 1 Ghuznee St, Te Aro, Wellington

Phone: [REDACTED]

Is your feedback on behalf of an organisation or business*? (if yes, this confirms you have the authority to submit on the organisations behalf) **Yes** **No?**

Organisation Name Cannon Point Development Limited (I am acting as consultant planner on behalf of this organisation)

* Please include your full name, postal address, and email address. If your feedback is on behalf of a group or organisation, you must include your organisation's name and your role in the organisation.

Hearings

Do you wish to attend a hearing to present your submission during the hearings process during business hours beginning 11 December 2023? **Yes** **No**

If yes please indicate the most convenient location for you to be heard in order of preference⁴

- Monday 11th December – Wellington CBD –**
Greater Wellington Regional Council, 100 Cuba Street
- Tuesday 12th December – Masterton –**
Greater Wellington Regional Council, 34 Chapel Street
- Wednesday 13th December – Paraparaumu –**
Kapiti Coast District Council, 175 Rimu Road
- Online (we will send you a link)

If yes please ensure we have your email address and phone number.

³ Please note: We require your contact details. Your feedback, name and address are provided to decision makers. Your feedback, with your name only, will be available on our website. However, if requested, we may make feedback, including contact details, publicly available. If you feel there are reasons why your contact details and/or feedback should be kept confidential, please email: future.developmentstrategy@wrlc.org.nz. A copy of the full privacy statement can be found online.

⁴ We will endeavour to accommodate your first preference. Dates and times will be confirmed once submissions close. Additional dates may be added depending on availability and need.

These questions are optional but will help us understand which groups of the community are engaging with us.

What gender are you?

- Male Female Prefer not to say

What age group do you belong to?

- 15–17 18–24 25–34 35–44
 45–54 55–64 65–74 75+

Which ethnic group(s) do you feel you belong to? (Please select as many as apply)

- Pākehā/NZ European Other European Māori
 Cook Island Māori Samoan Tongan
 Indian Chinese Southeast Asian
 Other (please specify):

Where in our region do you live?

- Kāpiti Coast
 Te Awa Kairangi ki Tai / Lower Hutt
 Porirua
 Te Awa Kairangi ki Uta / Upper Hutt
 Masterton
 Carterton
 South Wairarapa
 Pōneke / Wellington City
 Horowhenua
 I don't live in any of these areas.

Would you like to subscribe to the WRLC newsletter?

- Yes No

Your Feedback

We want your views on how this “big picture” approach could be improved. We have six questions below and an opportunity to provide more detail. We strongly encourage you to read the proposed approach and accompanying information before answering the following questions below.

QUESTION 1: VISION AND STRATEGIC DIRECTION OF THE FUTURE DEVELOPMENT STRATEGY

What are we proposing?

The overarching direction that guides the Future Development Strategy is made up of the vision, strategic direction, the 5 priorities for how to prioritise areas for development and statement of iwi and hapū values and aspirations for the development in our region.

Why are we proposing this?

We aspire to be responsible ancestors by ensuring the Wairarapa-Wellington-Horowhenua Future Development Strategy will provide for growth that is sustainable by meeting the needs of the present without compromising the ability of future generations to meet their own needs. We want our future to be made up of well-functioning urban environments and a flourishing, zero-carbon region that is founded on Te Tiriti o Waitangi and realised through the tino rangatiratanga of tangata whenua.

Question 1: Do you support our vision and strategic direction that guides the draft Future Development Strategy?

Support

Don't support

Unsure

See Attachment 1.

QUESTION 2: OUR PLAN FOR WHERE WE DEVELOP HOUSING OVER THE NEXT 30 YEARS AS OUR REGION GROWS.

What are we proposing?

We're providing for affordable housing that meets our diverse needs, and for compact, well-designed towns and cities. We're proposing to concentrate most of our housing development in existing urban areas and rural towns with good current and future transport links that function well now or will be improved through future transport developments (known as "strategic transport networks").

Why are we proposing this?

These proposals will help address our current and future housing needs as our population grows over time as well as for people in our region to live low carbon lifestyles and get around easily. Concentrating housing development in urban centres ensures we protect our natural areas and food production land from encroachment.

Question 2: Do you support our proposal to prioritise **housing development** in our existing towns and cities and around our strategic transport network ie around current and future transport hubs and routes?

Support

Don't support

Unsure

See Attachment 1.

QUESTION 3: OUR PLAN FOR WHERE WE DEVELOP BUSINESS LAND OVER THE NEXT 30 YEARS AS OUR REGION GROWS.

What are we proposing?

We're proposing to concentrate most of our business development in existing urban areas and rural towns with transport links that function well now or will be improved through future transport developments (known as 'strategic transport networks').

Why are we proposing this?

This proposal helps support productive, and sustainable local employment. A growing region means that there will be more people seeking employment here. While the Future Development Strategy cannot require growth in business and employment activity (i.e. more jobs or more businesses), it can support this by making sure that the regulatory settings and infrastructure that is required for businesses to flourish is in place at the right time.



Question 3: Do you support our proposal to prioritise **business development** in our existing towns and cities and around our strategic public transport network ie around current and future transport hubs and routes, to provide for sustainable, local employment?

Support

Don't support

Unsure

See Attachment 1.

QUESTION 4: OUR PLAN FOR KEY INFRASTRUCTURE TO SUPPORT DEVELOPMENT IN OUR REGION..

What are we proposing?

Our proposed approach is to maximise use of current and planned infrastructure in the most efficient ways possible to get the best from our infrastructure investments. This includes providing the infrastructure we need such as stormwater, wastewater, drinking water, road, rail, cycleways, electricity and social infrastructure such as schools and hospitals in the most well-functioning and cost-efficient ways possible. It also includes fully unlocking the development potential of our current and future strategic public transport corridors.

Why are we proposing this?

We want to ensure that our infrastructure meets the needs of our diverse and growing population, supports housing, business and well-functioning urban environments, and is as cost-efficient as possible. We are proposing that infrastructure planning and development planning are undertaken together, to improve efficiencies and leverage co-investment opportunities with the public and private sector. We are looking for ways to speed up infrastructure required to enable us to meet our strategic direction, faster whilst being fiscally responsible.

Question 4: Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

Support

Don't support

Unsure

See Attachment 1.

QUESTION 5: OUR PLAN FOR WHERE TO LIMIT OR AVOID DEVELOPMENT IN OUR REGION.

What are we proposing?

We're protecting what we love. Our region is subject to various constraints on development and contains areas with precious values we are proposing to protect by limiting or avoiding development in these areas. This includes extensive measures to protect our environment and water supply areas along the central mountainous spine between Wairarapa and the rest of the region, and the various natural hazard risks which the region is subject to and sites of cultural importance to Māori in our region.

Why are we proposing this?

Our proposed plan ensures communities are safer from significant natural hazards and are becoming more climate resilient, and regional growth also avoids creating new risks. It ensures urban development is designed to minimise impacts on the natural environment, our food producing areas and our rich cultural heritage.

Question 4:

Do you support our proposed approach to protect the areas we love by avoiding or limiting? urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

Support

Don't support

Unsure

See Attachment 1.

QUESTION 6: REFLECTING IWI AND HAPŪ VALUES AND ASPIRATIONS

What are we proposing?

Te Tirohanga Whakamua is a statement of iwi and hapū values and aspirations for urban development in our Region. It was created by WRLC iwi members and has informed the development of our draft strategy. Some values and aspirations expressed within it that go beyond the scope of the draft strategy and will likely be captured by other work programmes. Well-functioning urban environments need to enable Māori to express their cultural traditions and norms. We'd like to hear from both mana whenua and from other Māori in our region on how we can best support their diverse values and aspirations for urban development.

Why are we proposing this?

Supporting values and aspirations set out in Te Tirohanga Whakamua is vital to realising the Future Development Strategy's vision of a region founded on Te Tiriti o Waitangi and realised through the tino rangatiratanga of tangata whenua. A significant number of Māori living in our region do not have whakapapa links here. It's important that we also hear the views of these individuals and groups on our proposals for the future of our region through the Future Development Strategy.



Question 6: How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

See Attachment 1.

Wellington Regional Leadership Committee Secretariat
c/o Future Development Strategy Lead
PO Box 11646
Wellington 6011
Via email: future.developmentstrategy@wrlc.org.nz

09 November 2023

**SUBMISSION ON THE WAIRARAPA-WELLINGTON-HOROWHENUA DRAFT FUTURE
DEVELOPMENT STRATEGY BY CANNON POINT DEVELOPMENT LIMITED**

Dear Future Strategy Development Team,

Please find **attached** a submission by Cannon Point Development Limited on the Wairarapa-Wellington-Horowhenua Draft Future Development Strategy including completed submission form and full submission.

Please contact me in the first instance, should you wish to discuss the submission.

Regards,

Michael Hall,
On behalf of Cannon Point Development Limited



MICHAEL HALL

URBAN SPACES LEAD

m: [REDACTED] e: [REDACTED] w: www.awa.kiwi

ATTACHMENT 1: Cannon Point Development Limited Submission on the Wairarapa-Wellington-Horowhenua Draft Future Development Strategy

Question 1: Do you support our vision and strategic direction that guides the draft Future Development Strategy?

Don't support.

Tell us why:

Cannon Point Development Limited is the developer of land hereafter referred to as Cannon Point. Cannon Point is located approximately 2.5km north-east of Upper Hutt Town Centre, along the North/West boundary of Totara Park residential and lifestyle zones.

The proposed vision and strategic direction of this draft Future Development Strategy (FDS) does not adequately recognise Cannon Point as a future development greenfield area. Cannon Point Development Limited would only be able to support the vision and strategic direction of the draft FDS if Cannon Point is included as a prioritised future development greenfield area. This would reflect:

- (1) The significant investment and works that have already been consented, and partially implemented at Cannon Point, and pre-application discussions with Upper Hutt City Council (UHCC) regarding future stages of the development.
- (2) Proposed zoning of Cannon Point for residential use under proposed UHCC District Plan Changes.
- (3) Recent Upper Hutt City Council thinking about the location and approximate capacity of the City's residential areas.
- (4) Planned infrastructure investment as provided for in the FDS and the UHCC Long Term Plan.

These matters are addressed successively below.

Significant investment and works that have already been consented, and partially implemented at Cannon Point, and pre-application discussions with Upper Hutt City Council (UHCC) regarding future stages of the development.

The Cannon Point development is shown on the map contained in Appendix 1. Stage 1 and 2 of the subdivision have been consented and implemented. Stage 3, the western extension to this development, has been zoned for residential use under UHCC proposed plan changes (as detailed further below) and partially subdivided. Consent for the remaining Stage 3 area will be sought over 2023-24 and this has been the subject of pre-application discussions with UHCC. This will finish the greenfield extension of Totara Park to the south-west and retain the backdrop of the significant ecological resource of the western hills. Recreational walking tracks and compact and well considered urban form outcomes are proposed in this section of the development, with a retention of wetlands. Examples of the design of development are provided in Appendix 2.

Future development will also be considered to the north-east past Tacoma Drive to complete the extension of the Totara Park suburb (identified as 'Future Stage' on the map).

Proposed zoning of Cannon Point for residential use under proposed UHCC District Plan Changes.

The inclusion of Cannon Point as a Future Development Area would be consistent with the proposed changes to the UHCC Operative District Plan under the Intensification Planning Instrument (IPI) and the provisions of Proposed Plan Change 50 (PC50) – Rural Review. Cannon Point is proposed in the IPI process to be enabled for residential development. Proposed PC50 also provides for re-zoning of the site for residential use. Under the Operative Upper Hutt District Plan, part of the site is zoned General Rural (part of Stage 2 – which is already consented for residential development and Stage 3, along with the Future Stage) and Rural Lifestyle (Stage 1 and part of stage 2 – already consented).

A submission will be provided to Upper Hutt City Council on PC50 to extend the residential zone to cover stage 3. It is proposed the re-zone the site to General Residential to be consistent with (Stage 1, part of Stage 2 which is consented and the Future Stage). The proposed zone changes are shown in Appendix 3. Whilst it is acknowledged that UHCC is still to release its decisions on the IPI plan change, their proposed form clearly demonstrates the intent of UHCC to provide for residential use of this land and for the development to be completed.

Recent UHCC thinking about the location and approximate capacity of the City’s residential areas.

In 2022, UHCC identified Cannon Point as one of seven current and future proposed developments in Upper Hutt City as shown in Appendix 4. This project was identified as a result of a joint application between UHCC and Cannon Point to apply for the Infrastructure Acceleration Fund.

Cannon Point was also identified in the Upper Hutt Regional Housing and Business Development Capacity Assessment – Housing update May 2022 as plan enabled for development capacity in the Medium Term under the Greenfield Capacity inclusion analysis as shown in Appendix 4. Whilst the achievable capacities may now be different due to the proposed IPI and the Medium Density Residential Standards they do demonstrate recent UHCC and Wellington Regional Leadership Committee thinking about how Cannon Point can be address residential housing supply in the city that is appropriate for the city.

Planned infrastructure investment as provided for in the FDS and the UHCC Long Term Plan.

The Cannon Point development is supported by the already planned for infrastructure. Both the UHCC Long Term plan 2021-2023 (p.22 – Key Infrastructure Projects We’re Proposing to Deliver) and FDS (Diagram 19: Key parts of our strategic transport network) identify that the roading project to widen Totara Park Bridge is to be undertaken within the next 10 years.

It is considered that the existing and planned infrastructure and type of development form being proposed for Cannon Point would meet the intent and outcomes of the FDS.

Question 2: Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network i.e. around current and future transport hubs and routes?

Support.

Tell us why:

Cannon Point Development Limited support the approach that Greenfield Areas should be in areas with easy access to, or ability to be easily serviced by, more frequent public infrastructure that connects people to employment, services, and education.

The site is approximately 3km from the Upper Hutt city centre and train station. Existing bus services to Totara Park can easily be extended to provide for passengers from the site once developed, and the greater population in the catchment would enhance the viability of the bus service and perhaps support an increase in the service frequency. Cycling to Upper Hutt city centre and the train station would be entirely feasible, as the route is generally flat and could be upgraded to improve the convenience and safety of cycling. Provision of shared cycle paths through the development can be provided along with provision for bus stops to extend into this new area of Totara Park.

Question 3: Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network i.e. around current and future transport hubs and routes, to provide for sustainable, local employment?

Support.

Tell us why:

This is supported by Cannon Point Development Limited.

Question 4: Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

Support.

Tell us why:

Yes, this is supported in principle. The proposed infrastructure outlined in the FDS is consistent with the UHCC Long Term plan 2021-2023 in that both identify the roading project to widen Totara Park Bridge is to be undertaken within the next 10 years. This roading project provides for the residential development at Cannon's Point.

Question 5: Do you support our proposed approach to protect the areas we love by avoiding or limiting? urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

Unsure.

Tell us why:

Our support for this is conditional on there being a strong evidence base that these hazards and ecological matters have been assessed at a site-specific level and that avoidance of effects provides the best environmental outcome for managing development which also include social and economic drivers.

Question 6: How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

Unsure.

Tell us why:

Cannon Point have no comment on this question.

Question 7: Do you have any other feedback on the draft Future Development Strategy?

In summary, we would like to formally request that the Future Development Strategy maps are extended to clearly cover all of the Cannon Point residential development area. A map showing this proposed area is below in Appendix 5.

Appendix 1: Cannon Point Development. Figure 2 from Draft Cannon Point Stage 3 Masterplan, Align, 28/03/2023.

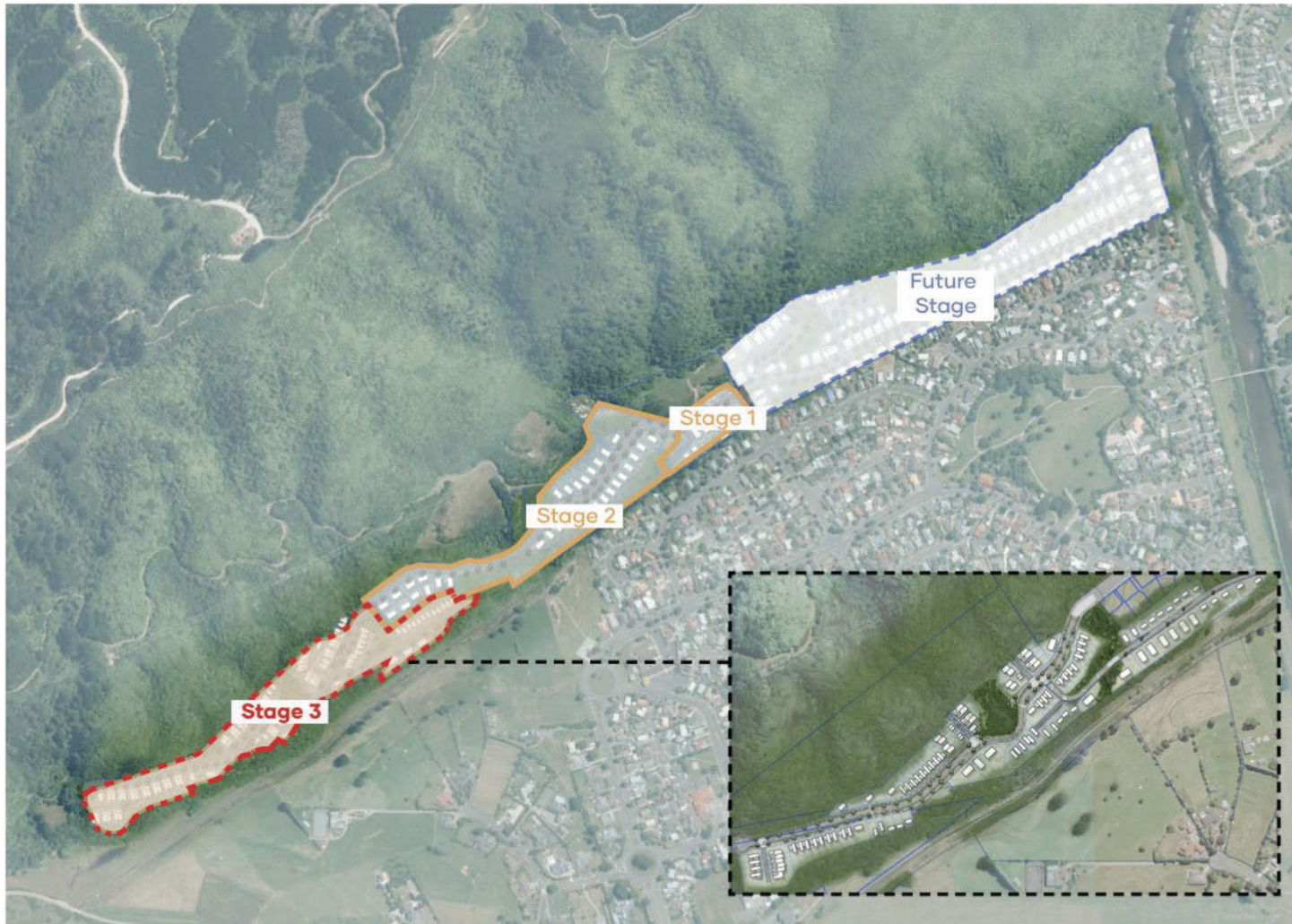
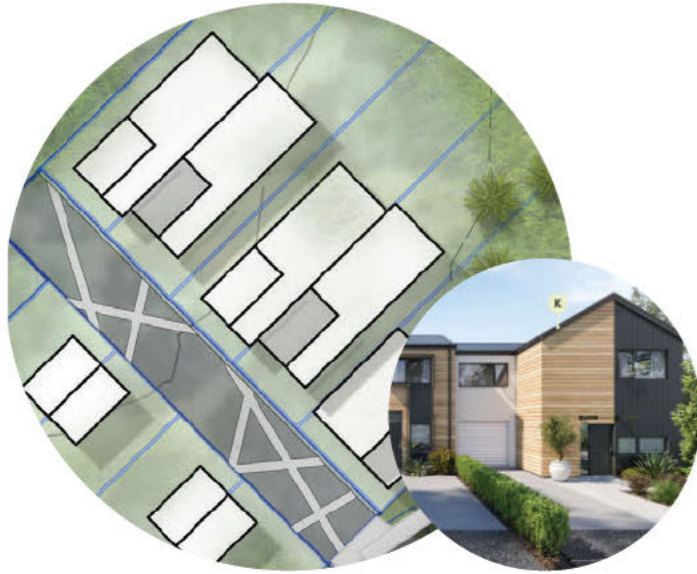


Figure 2: Cannon Point Staging Plan

Appendix 2: Example of Design Development for stage 3

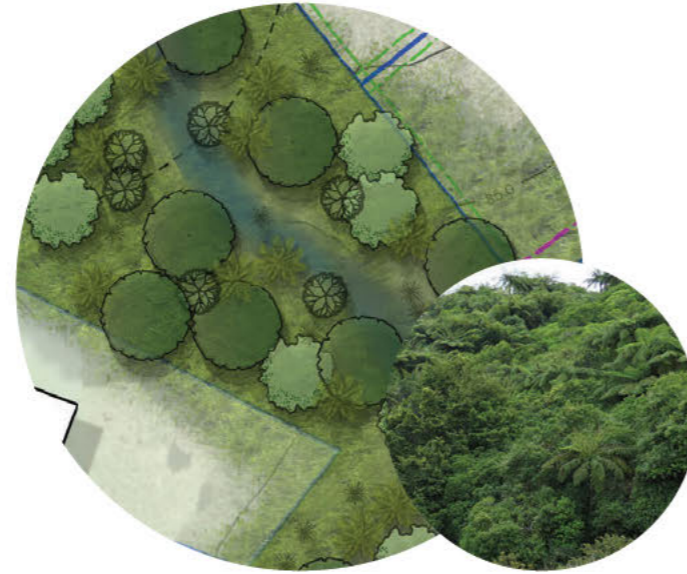
DESIGN PRINCIPLES



Create a Compact Development

Development will act as a transition from Totara Park to the natural frame of the western hills by:

- Clustering development where possible to provide more open space.
- Controlling height and design to provide appropriate house and town house designs for the area.



Protect natural edges and use this to create a distinct visual identity

- By designing around wetlands and stream corridors, protecting the ecological value.
- To retain, strengthen and promote the public walking track to Birchville Dam.



Create movement that contributes to place-making

- By creating connections that respond to landform and ecological features
- Provide for walking and cycling, within a street corridor framed by high quality landscaping.
- Providing a movement hierarchy that slows design speed to allow for more community interaction.



Water Sensitive Design

- Creating stormwater treatment areas that creates a sense of awareness of the processes of water sensitive design.
- Protecting wetlands and waterways onsite which celebrates the natural hydrological processes and what is unique about the site.
- Improving ecology and water quality.

RESIDENTIAL PRECINCT PLAN

1. Lower Terrace Precinct

The lower terrace precinct drops to a smaller terrace to the east of the stream with a retained planted batter to the north and south. These houses have a relationship to the streams that traverse this area which provide additional amenity to these sites. A lower density of housing is proposed, with single story dwellings and buffer planting to the edge of the terrace to soften and limit views of the built form from the south east.

2. Gateway Precinct

The central road forms the spine for the development and is a continuation of the Stage 1 & 2 road that links to Tacoma Drive in Totara Park. A bridge over the waterway ensures that the stream is protected and celebrated through remaining a visual part of the development. This stream corridor forms a green spine that transects the site which will be planted to provide improved ecological value. The gateway has been developed with larger two story duplexes and standalone homes to the rear of the terrace where the forest backdrop to soften the built form.

3. Wetland Precinct

The existing wetland forms an important central amenity space in Stage 3. The surrounding housing overlooks the wetland, providing good surveillance and borrowing the amenity of this area for the adjoining residents with open fencing and complimentary planting. These houses are all double story duplex with the medium density of this pocket being offset by the natural backdrop of the forest and the wetland planting.

4. Forest Precinct

Double story medium density housing typology (predominantly duplex) set against the wooded escarpment behind which settles the built form into the landscape. Housing materials proposed shall compliment the natural backdrop.

5. Ridge Line Precinct

The more visible housing typology to the front of the terrace is proposed to be lower density with single story and buffer planting to the south boundaries which reduces visual effects of the built form. Housing is orientated towards the views to the south/south east.



Figure 15 - Precinct Plan

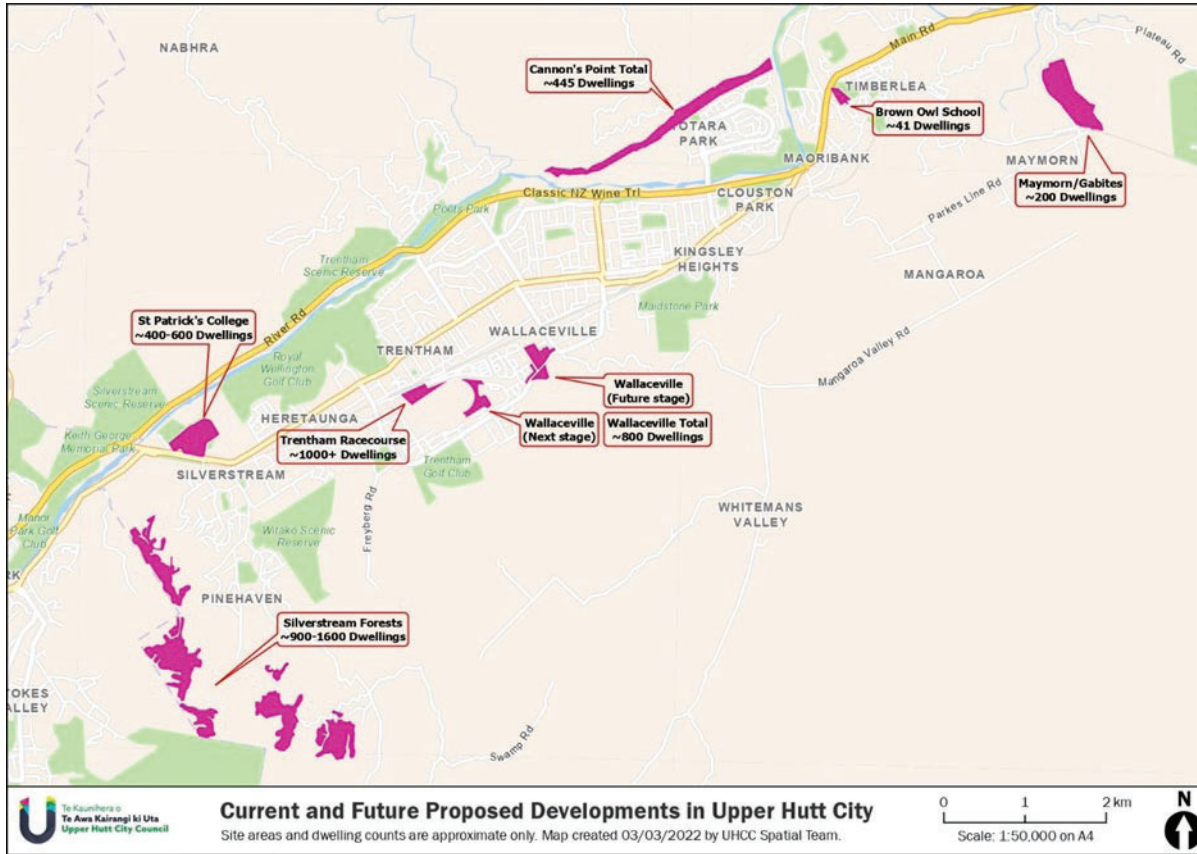


Figure 37 - Sketch: Central Wetland

Appendix 3: Proposed re-zoning of Cannon Point pursuant to PC50 of the Upper Hutt District Plan, Upper Hutt City Council Website, PC50-Rural Review-Public Viewer



Appendix 4: Pre-HBA 2023 inclusion of Cannon Point for greenfield development



UHCC future developments from: <https://www.upperhuttcity.com/files/assets/public/news/current-and-future-proposed-developments-upper-hutt-final-2022.pdf>

Table 6.21: Greenfield capacity inclusion analysis

Site name	Greenfield Model Yield	Feasibility outputs for other density options (sensitivity tests)	Actual Consented Yield (at 2021)	Identified in UHCC Strategies?	Operative Zoning	Captured in PC50?	Landowner & Developer intentions	In or intended to be urban environment? ³⁹	Short term ⁴⁰	Medium term ⁴¹	Long term ⁴²	Plan enabled
Southern Growth Area	1,960	2,857	N/A	Yes, in Land Use Strategy	Spur zoned Low Density Res, rest Rural Zone	No. Will be subject to separate plan change.	Ongoing, motivated landowner	Yes	✓	✓	✓	
St Patricks Estate	77	290		No, but currently enabled	Limited residential enablement	Yes. Uplifted further, NPS-UD influence.	Consents obtained to fill the site, works underway	Yes	✓	✓		
Wallaceville	364	1,314		Yes, in Land Use Strategy	Suburban enablement	Yes. Uplifted further, NPS-UD influence.	Ongoing active development	Yes	✓	✓		
Cannon Point	274	400		No	Rural Zone	Yes, Residential Zone.	First stage consented and sold, recent purchases of adjacent site	Yes		✓		
Kingsley Heights	266	819	N/A	No	Residential Zone	Yes, and uplifted further.	On hold, split ownership	Yes	✓			
Gillespies Road	1,200	1,740	N/A	Yes, in Land Use Strategy	Residential Zone	Yes, Future Urban Zone.	None, split ownership	Yes		✓	✓	
Gabites Block	1,292	1,870	N/A	Partially	Rural Zone	Yes, Settlement Zone. ⁴³	Private plan change being developed. ⁴⁴	No			✓	

Table 6.2.1 from Upper Hutt City Council Regional Housing and Business Development Capacity Assessment – Housing update May 2022

Appendix 5: Proposed amendment to draft FDS maps to include Cannon Point as a Future Development Area





Website:

www.historicplaceswellington.org

Email:

wgtn@historicplacesaotearoa.org.nz

Mail:

P.O. Box 12426

Wellington

6144

9 November 2023

Historic Places Wellington makes the following submission on the Draft Future Development Strategy.

1. Historic Places Wellington is an incorporated society which aims to promote the identification and protection of heritage places in the Wellington region and inform the public of their significance. I am the Chair of the Society's Committee.
2. We wish to be heard by the WRLC Hearings Subcommittee on Monday 11 December.
3. Our submission generally supports the background information in the draft FDS, and makes the following specific comments.
4. In relation to Question 3, about prioritising housing development near strategic transport hubs and routes, we note that many of Wellington's oldest buildings are in those areas following earlier patterns of urban development of our city. It is important to recognise and respect areas of heritage and character in those places and collaborate with the people of those places in designing and encouraging appropriate development.
5. The specific areas of high cultural value along the LGWM MRT Corridor include the Wellington CBD, and the old inner suburbs of Thorndon, Mount Victoria, Mount Cook, Newtown and Berhampore. HPW does not support the Wellington Spatial Plan (referred to in Appendix 2 of the draft FDS) as it was adopted by slim majority vote by Wellington City Council in mid-2022 despite much controversy and more than 3000 submissions, the majority of which were disregarded.
6. Additionally, there are many other specific sites of interest identified in the Wellington District Plan and in other planning documents for the Wellington regional area (including important sites in areas of green space or subject to the Crown disposal process), and others identified by Heritage New Zealand Pouhere Taonga.
7. In relation to Question 4 we support the acknowledgment of the need "to protect the places we love", and in particular by avoiding development in "areas of high cultural value".
8. We support the proposal identified in Question 4, and its recognition of areas of high cultural value having a specific acknowledgement in the FDS.

9. We particularly support Principle 6 of the Placemaking Principles in Appendix 3 to the FDS, “Fit with Local Landscape, and Natural and Historic Heritage”, given the importance of character, histories and heritage to placemaking.

10. We were disappointed not to be invited to participate in any engagement about developing the FDS and wish to make further specific comments in due course.

Regards and nga mihi

Felicity Wong
HPW Committee Chair





**SUBMISSION ON DRAFT WAIRARAPA-WELLINGTON-HOROWHENUA
FUTURE DEVELOPMENT STRATEGY**

TO: Wellington Regional Leadership Committee ("**Committee**")

SUBMITTER: Bunnings Limited ("**Bunnings**")

SUBMISSION ON: Draft Wairarapa-Wellington-Horowhenua Future Development Strategy ("**Draft FDS**")

Background and summary

1. Bunnings is one of the leading suppliers of home improvement and outdoor living products in Australasia. Employing more than 5,600 New Zealanders, Bunnings operates 41 warehouses and smaller format stores, and 9 trade centres throughout New Zealand, along with a commercial selection centre, a distribution centre and a support office. With four stores and a trade centre located within Wairarapa, Wellington, and Horowhenua, Bunnings is well aware of the ongoing growth pressures in these areas, and the need to provide for growth in a sustainable way that contributes to well-functioning urban environments.
2. Bunnings welcomes the opportunity to submit on the Draft FDS, which will be critical for shaping the long-term vision for supporting growth in the Greater Wellington region and Horowhenua.
3. Bunnings supports the identified areas recognised for urban growth in the Draft FDS, but is concerned that the Draft FDS places an over-reliance on infill to meet future growth needs.

Future growth is not able to be entirely supported through intensification

4. The purpose of an FDS is to promote long-term strategic planning by setting out how well-functioning urban environments in existing and future urban areas will be achieved, and provide sufficient development capacity over the next 30 years to meet demand.¹
5. Wairarapa, Wellington and Horowhenua are expected to experience significant growth in the next 30 years.² This growth will require a greater supply of business, residential and industrial land, and the necessary infrastructure and services to support it.
6. Bunnings is concerned the Draft FDS is placing an over-reliance on intensification to provide the necessary land to meet this growth. The Draft FDS even expressly recognises there is a significant shortfall of industrial

¹ National Policy Statement on Urban Development 2020 ("**NPS-UD**"), clause 3.13.

² Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, page 5.

land that is not proposed to be addressed, but rather dealt with as part of the next Future Development Strategy in 6 years' time.³

7. Bunnings strongly supports a Draft FDS that encourages and enables efficient land use, but not all land uses can be appropriately provided for through infill. Bunnings stores need large lot sizes to operate with convenient access to arterial roads, which are often located in industrial areas, and need to provide sufficient land area for parking (as many products cannot realistically be carried by hand or taken on public transport). These needs are typical of other trade supply and industrial manufacturing activities. If these activities cannot be provided for, they will locate elsewhere.
8. With commercial, residential, and industrial land uses competing for existing land supply through infill development, unless managed carefully this also contributes to reverse sensitivity effects, inflated land prices, and pressure on existing infrastructure.

More nuanced approach required in the identification of urban areas

9. The Draft FDS identifies large areas as either Wāhi Toitū (areas to be protected from new development) or Wāhi Toiora (areas where future development must be carefully managed to ensure values are protected, and risks mitigated).⁴ While a nuanced approach to land development is supported and should be provided for in the Draft FDS through Wāhi Toiora, there appears to be substantial overlap between Wāhi Toitū and Wāhi Toiora areas.
10. Wāhi Toitū should only be reserved for areas that are incapable of being developed (for example due to significant natural hazard risk), and the Draft FDS should recognise that there may be other areas appropriate for urban development that can contribute to well-functioning urban environments, natural hazard risks can be avoided or managed, and infrastructure servicing can be delivered (through for example private funding). The Draft FDS needs to be responsive enough that these types of opportunities can be explored and, where it can be demonstrated they are appropriate, delivered.
11. A more nuanced approach to the identification of urban growth areas has the added benefit of providing more guidance for district councils as to the location of particular land uses, in terms of informing zoning decisions to provide for appropriate residential, commercial, and industrial development. While the Draft FDS identifies where urban land can/cannot be located, it does not consider (even at a macro level) the compatibility of different urban land uses (eg residential, commercial, industrial), and whether there are benefits or problems generated by their co-location.
12. As the Draft FDS will only be revised every 6 years, it needs to be agile enough to respond to changing growth pressures, and demand for potential land use over time so that it does not constrain, rather than facilitate future development. That approach is consistent with Policy 8 of the NPS-UD, which expressly recognises

³ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, page 44.

⁴ Draft Wairarapa-Wellington-Horowhenua Future Development Strategy, pages 29-31.

the need to be responsive to change, and be amenable to unanticipated or out-of-sequence developments that provide significant development capacity and contribute a well-functioning urban environment and are well-connected to transport corridors.⁵ While a well prepared, high quality FDS should mean fewer "out-of-sequence" developments, the Draft FDS should not preclude such development where it can be demonstrated that infrastructure servicing can be provided, is privately funded, and is contributing to well-functioning urban environments.

Relief sought

13. Bunnings:
- (a) supports the retention of areas already identified for urban development in the Draft FDS; and
 - (b) seeks amendments to the Draft FDS to:
 - (i) provide a clearer delineation between Wāhi Toitū/Wāhi Toiora areas;
 - (ii) limit the areas identified as Wāhi Toitū only to areas where development is incapable of being delivered; and
 - (c) provide greater certainty as to the types of urban activities (eg residential, commercial, industrial) anticipated in broadly identified urban areas, including any additional areas identified as appropriate for urban development through the Draft FDS submission process.

Next steps

14. Bunnings would be open to engaging further with the Committee on the matters raised in this submission if that would assist the Committee. If there is an opportunity to speak to the submission, Bunnings would also be willing to do so.

Bryce Hutchison

Head of Property - NZ
Bunnings Limited

⁵ NPS-UD, Policy 8.



9 November 2023

By email: future.developmentstrategy@wrlc.org.nz

Submitter: Landlink Ltd

Attention: Paul Turner (Director)

Email: paul@landlink.co.nz

Postal address: P O Box 370, Waikanae

Phone: 04 902 6161

I wish to be heard: at Paraparaumu (KCDC, 175 Rimu Road) on Wednesday 13 December

Landlink is based on the Kāpiti Coast.

Thank you the opportunity to provide feedback on the draft Future Development Strategy (FDS). Landlink are a Kāpiti-based land development consultancy. We have operated in this area for over 30 years.

We are concerned with the process and assumptions that underly the FDS, together with the rigid approach that it promotes.

Consultation

We have concerns with the nature of the consultation process for the FDS.

We find the nature of Questions 1 – 6 of the Feedback Form leading and inappropriate for a genuine consultation process.

A consultation timeframe of 1 month for a document that is intended to fairly rigidly frame what development can and can't occur across the region is too short.



There has been very limited advertisement/promotion of the FDS to ensure that ratepayers are even aware that it exists. Most ratepayers of the region will be unaware of the document and that it significantly changes the long term planning/growth strategy work that their local authority will have undertaken.

The development community has not been consulted as is required by clauses 3.15 (f) and 3.21(1)(a) of the National Policy Statement for Urban Development.

The principles of consultation require encouragement of persons who will or may be affected by, or have an interest in, a matter to be encouraged to present their views. This has not occurred.

Timing of Release

Releasing a FDS of this nature 1 week prior to a central government election, when the opposition (who are now the government) had made clear statements around their views and intent on areas of prime importance to the content and direction of the FDS, is an irresponsible use of rate-payer and tax-payer funds. The incoming government had made clear statements of direction contrary to key drivers of the FDS as it is currently drafted, including:

- the direction to release greenfields land for development
- the removal of Land Use Capability 3 (LUC3) land from the definition of Highly Productive Land (which would have a significant consequential effect on the constraints mapping which informs the FDS)
- allowing individual Local Authorities the discretion as to whether to have Medium Density Housing be a Permitted Activity in its district
- disestablishing Let's Get Wellington Moving.

We strongly disagree with the WRLC view that it is of no consequence what party/s form the government. While regional and urban planning must continue through looming elections, it is an irresponsible use of tax-payer and rate-payer funding to develop and release a document of this nature so close to an election, particularly when the opposing – and polling favourite – party has expressed clear contrary direction.

Constraints Mapping

The constraints mapping used to help determine the areas proposed for development (and conversely the areas where development will be made very difficult) is not acceptable. Diagrams 5 and 6 are provided at such a small scale that it is difficult, if not impossible, to determine if a particular piece of land is Wāhi Toitū (protected from development), or is Wāhi Toiora (an area that we need to go carefully in). In some areas



the two diagrams contradict one another. There is no way to zoom in on or interrogate these maps as to why particular areas are seen as unsuitable for development.

The Constraints Mapping Report that informs the FDS likewise provides mapping at an unreadable scale. As mentioned, LUC3 soils are included as a constraint on these maps when the incoming government have made it clear that these soils will be removed from the definition of Highly Productive Soils.

The Constraints Mapping Report states that it is intended for spatial planning purposes only and not intended as a substitute to local level assessments of constraints and values. It then goes on to say that the Wāhi Toitū areas it has identified are to be protected from urban development. This appears to be a contradiction within the report.

The principles of consultation require that persons who may be affected by, or have an interest in, a matter be provided with reasonable access to relevant information and in a format that is appropriate. This has not occurred.

Housing Availability

As depicted in Figure 1.8 of the Housing and Business Development Capacity Assessment (September 2023), the Future Development Strategy significantly leans on the adoption of medium-density infill housing. However, Landlink has reservations regarding the analytical assumptions and the scarcity of detailed information used to estimate the reasonably expected realisable housing capacity.

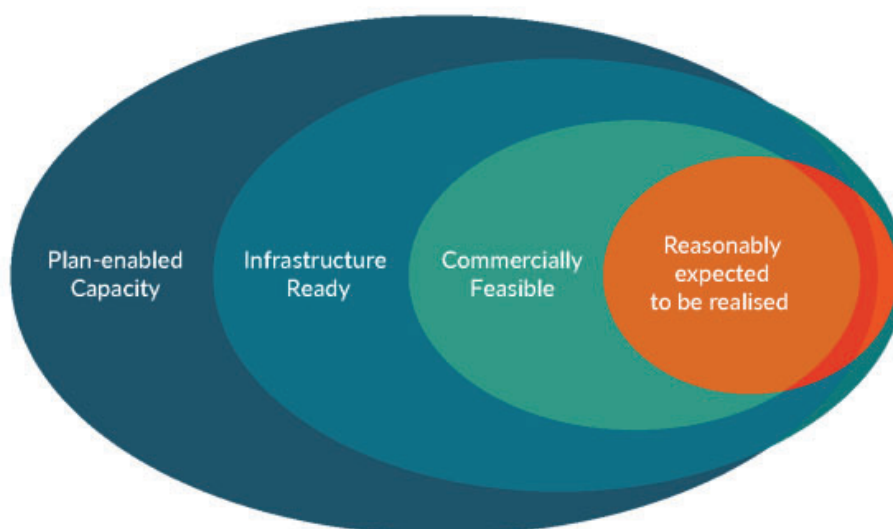


Figure 1.8: Relationship between types of housing development capacity. Source: Ministry for the Environment.

Figure 1.8 from the Housing and Business Development Capacity Assessment, September 2023



For instance:

- **Plan Enabled Capacity:** While this element appears straightforward, clarity is needed on the assumed area per dwelling for various housing types in different localities.
- **Feasibility:** The model assumes a standard 20% profit margin to denote feasibility. However, detailed insights into the cost assumptions that inform this figure are lacking.
- **Realisable housing capacity:**
 - **Human Behaviour:** The realisable capacity assessment posits that landowners will engage in development when a specific profit margin threshold is achieved. This view simplifies the diverse motivations of property owners, implying a uniform response to profit incentives. While adjusting the feasibility baseline profit margin might account for risk aversion, it is worth noting that behavioural economics challenges the notion that individuals invariably solely make decisions based on economic utility maximisation. The question remains: How does the model realistically account for human behavioural factors divergent from strict utility maximisation? The conversion rate from feasible to realisable, suggested at approximately 64%, may be overly optimistic.
 - **Finance:** The shift towards smaller infill projects within existing urban spaces brings unique financing hurdles. These initiatives typically necessitate a greater initial capital outlay, given the intricate build designs that go beyond preparing a vacant plot. Moreover, these projects may not appeal to lenders in the same way as larger, more stable greenfield developments do, especially when undertaken by nascent developers who might be viewed as less established by financial institutions. Considering these factors, does the model robustly account for potential fluctuations in interest rates and the overall availability of capital? The resilience of the proposed infill housing capacity under varying economic conditions needs careful examination to ensure the assumptions of the model remain viable, even in less favourable financial conditions.
 - **Private Sector Capability:** The viability of realisable smaller infill developments hinges on a thorough assessment of the private sector's capacity. While the Implementation Plan is expected to address this competency gap, as discussed in the webinar sessions, it remains unclear how these considerations have been integrated into the infill targets set forth in the FDS. For the projected housing capacity to be realistic and attainable, it is essential that the plan reflects a comprehensive understanding of the private sector's actual capabilities. Absent this consideration, the FDS's expectations for realisable housing may not be grounded in the current market reality.



It is our understanding that the reported capacity numbers have not been consulted on with the development community. This is not only a sensible step in this market, but also a requirement of clauses 3.15 (f) and 3.21(1)(a) of the National Policy Statement for Urban Development.

Rigidity of Approach

The FDS prioritises development in the following order:

- a. Areas of importance to iwi for development.*
- b. Areas along strategic public transport network corridors with good access to employment, education and 'active mode connections' such as walking, cycling, scootering and skateboarding.*
- c. Priority Development Areas*
- d. Within existing rural towns around current and proposed public transport nodes and strategic active mode connections.*
- e. Greenfield developments that are well connected to existing urban areas in our towns and cities and can be easily serviced by existing and currently planned infrastructure, including by public and active transport modes, and where the location and design would maximise climate and natural hazard resilience.*

The FDS does not support development that does not meet these priorities.

Therefore, any greenfield development of any scale that does not fit all the criteria at e.) would be refused if considered against the FDS, regardless of its suitability to provide for the purpose and principles of the RMA when considered on its individual site circumstances and merits.

We consider this to be a very rigid and unsatisfactory approach, particularly given the broad-brush level of spatial planning/constraints mapping that has been undertaken to create the FDS.

Conclusion

The FDS is written in such a manner that it firmly identifies where development will be extremely difficult, and this is much of the region. However, the mapping process that sits behind this is not appropriate to that approach.

The details of the data and assumptions used in the modelling for the HBA are unknown and the reported level of uptake of infill housing unlikely in our view. Satisfactory



consultation with the development community as required by the NPS-UD has not occurred.

The consultation with the community that has been undertaken is inadequate and not in keeping with the principles of consultation that should be adhered to. The timing of the release of the FDS is inappropriate and an inefficient use of public funds when the now government is seeking a different direction.

For a document that will strongly influence the development of the region and the District Plans, and other resource management documents that will sit underneath it, the process to develop it has been less than satisfactory.

Paul Turner

Director

Landlink Ltd

9 November 2023

OMS 10 04
LMS:LD

Wellington Regional Leadership Committee
 C/- the Future Development Strategy Team
Future.developmentstrategy@wrlc.org.nz

Tēnā koe,

SUBMISSION TO THE WAIRARAPA-WELLINGTON-HOROWHENUA FUTURE DEVELOPMENT STRATEGY

Thank you for the opportunity to submit on the Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS). We also wish to thank the officers from the Wellington Regional Leadership Committee (WRLC) and Horowhenua District Council (HDC) who presented to the Strategy and Policy Committee on 7 November. Their presentation was informative and helpful.

This submission is made on behalf of the Strategy and Policy Committee of Horizons Regional Council.

Introduction

We recognise the population, housing, infrastructure and urban development pressures facing the Wellington region – pressures that do not stop at the regional boundary. The Horizons and Greater Wellington regions need to be strongly connected, due to the importance of moving people and freight between and around our regions. This has been a focus of the Regional Land Transport Plan, Accelerate25 and the Accessing Central New Zealand Governance Group. Collectively, the Horizons and Greater Wellington regions represent the 'middle million' – our connections are vital.

We are aware the Horowhenua District will feel the effects of, and have a role in accommodating Wellington's growing population. It is important that central government, local government and mana whenua work in partnership to respond to the challenges this will bring. For this reason, we **generally support** the rationale for including Horowhenua in the Wellington FDS, despite it being located in the Horizons region.

We **support the FDS in principle**, however raise a number of points through this submission for consideration by the hearing panel.

Governance structure & Horizons involvement:

We acknowledge the role of Horizons as an observer on the Wellington Regional Leadership Committee and would **support** stronger connections both at the governance and officer level through this committee.

Horizons have a strong interest in partnering, and being involved in, the development and planning associated with the implementation plan for the FDS, both at a governance level and officer level. We acknowledge the WRLC have reached out to various areas of Horizons for provision of information to support the FDS. However, moving forwards we see there is an opportunity for stronger collaboration between our two organisations, particularly in the transport, environmental planning and regulatory areas. We request this be addressed.

Alignment with key policy documents

There are a number of policy documents produced by Horizons Regional Council. It is imperative that the FDS is well-aligned to these documents as follows:

- With Horizons Regional Policy Statement, including Plan Change 3 which has been notified and is due to be heard in February 2024. We suggest the FDS should reference the One Plan RPS for proposals in the Horowhenua District.
- We note the NPS for Freshwater Management (2020), NPS-Highly Productive Land 2022 and NPS-Indigenous Biodiversity 2023 which require Horizons to review the RPS. We recommend the FDS, growth strategies and implementation plan be mindful of the onus these higher order documents place on regional and territorial authorities.

Climate resilience

We note that detailed information about climate-related risks and managed relocation is not readily available. We therefore encourage the WRLC to ensure that the FDS and its implementation plan are adaptive and can incorporate new information as it becomes available.

Maori engagement and involvement

We acknowledge the engagement that has occurred at an iwi level within the region, however have some concerns that the FDS does not adequately represent Māori in the Horowhenua district. We encourage the WRLC to ensure Māori are well represented and address any disconnects around housing access for Māori in the Horowhenua. We recommend officers from HDC and WRLC contact Horizons Tonga Māori representative (Te Kenehi Teira) and iwi relationships team.

Greenfield development and infrastructure to support intensification

We acknowledge the constraints associated with greenfield development as introduced through the NPS for Urban Development 2020 and NPS Highly Productive Land 2022. We note the figures in the FDS outlining the amount of greenfields development proposed in the short, medium and long term. A significant portion of the land surrounding Levin and the wider area is highly productive land. This land is important to the region's economy and food production. Horizons **support** the FDS limiting greenfields development to areas that avoid highly productive land.

There is significant potential for urban renewal in Levin to reduce sprawl and make the most of existing (transport) infrastructure. Leveraging off current transport infrastructure and focusing on compact urban form will assist with aligning to national emission budgets both now and into the future. In particular, offsetting emission reductions or adopting best practice for emission reductions will be key considerations for both infrastructure and residential development. If not considered, there is a risk that growth plans may be out of kilter with national emissions budgets.

We note the constraints associated with infrastructure capacity and the impact this has on urban development and growth. We hold concerns about the capability of

Horowhenua infrastructure to cope with intensification and would like more certainty on how this will be managed, particularly for three waters infrastructure.

Conclusion

Horizons **supports the FDS**, and acknowledges the rationale for including the Horowhenua district within this strategy. However we **seek** stronger involvement at the governance and officer level to ensure adequate reflection of transport planning, environmental planning and regulatory planning from Horizons.

We **wish to speak** in support of our submission.

Please direct any questions or feedback on this submission to Leana Shirley, Senior Planner on 0508 800 800 or by emailing [REDACTED]

Nāku noa nā,



Rachel Keedwell
CHAIR,
HORIZONS REGIONAL COUNCIL
POLICY AND STRATEGY COMMITTEE

9 November 2023

By email: future.developmentstrategy@wrlc.org.nz

Submitter: Mark McIntyre on behalf of myself and the other owners of 12 Waitohu Valley Road, Ōtaki

Email: [REDACTED]

Phone: 04 902 6161

I wish to be heard: at Paraparaumu (KCDC, 175 Rimu Road) on Wednesday 13 December

I am based: on the Kāpiti Coast

Thank you for the opportunity to provide feedback on the draft Future Development Strategy (FDS).

I am an owner of 12 Waitohu Valley Road (Lot 2 DP 59205), a 7.1ha property immediately adjoining the existing General Residential Zone on the north-eastern side of Ōtaki. The property is within an area identified as a 'medium-priority greenfield growth area' by Kāpiti 's Growth Strategy 'Te tupu Pai - Growing Well'. It is currently zoned Rural Production.

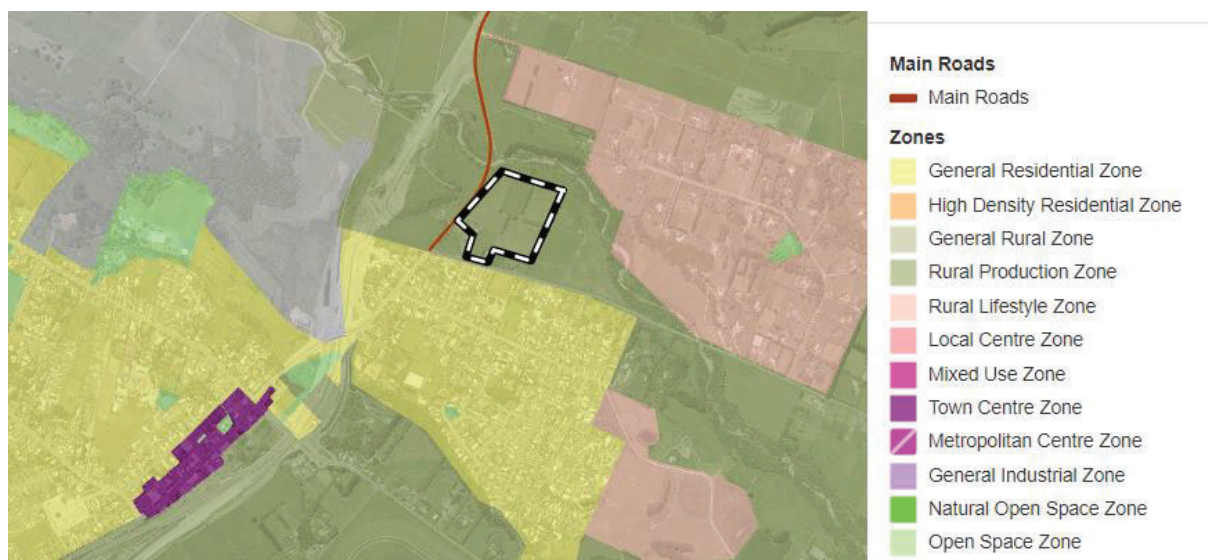


Figure One: 12 Waitohu Valley Road, in the context of the Kāpiti Coast District Plan

I believe that it is appropriate for this property/area to be included in the Priority Development Area for Ōtaki. It is a perfect area of land for the provision of much needed affordable housing to both Ōtaki and wider Wellington Region.

The property is located on a Major Community Connector Road (Waitohu Valley Road) and immediately adjacent to the General Residential Zone. The area is enclosed, situated between the General Residential Zone, the Rural Lifestyle Zone and the old State Highway One, a Main Road.

Waitohu School is located immediately across the road and the Ōtaki main road CBD less than 1km away.

The site is on the strategic transport network with easy access to Ōtaki train station and CBD.

Being closely enclosed by residential and lifestyle residential zones and properties, makes the future use of the land for primary production purposes unlikely.

While a portion of the land may be Land Use Capability 1 (LUC1), this is a narrow and non-cohesive strip of LUC1 land, separated from the larger area of LUC1 land to the east by the residential and lifestyle residential lands that bound it. Of note the area of LUC1 land to the south has been included within the Ōtaki Priority Development Area. I do not mean to say that this area should not be developed; but rather that the area including my land between the residential and lifestyle zones on Waitohu Valley Road should also be within the Ōtaki Priority Development Area.

My land and surrounds on Waitohu Valley Road have areas of Flood Hazard (Ponding) as does the area marked as a Priority Development Area. These can be overcome by appropriate design and density.

There are existing water supply and wastewater services immediately adjacent to the area. The expansion of the lifestyle residential zone would be an alternative scenario if utility capacity was an issue.

The site is highly suitably for residential development and to do so would be in keeping with, and giving effect to, the Vision and Strategic Direction of the FDS.

Constraints Mapping

I have struggled to understand the Constraints Mapping, particularly given the very small scale at which it is provided. For example, these excerpts from Diagram 5 - Wāhi Toitū and Diagram 6 - Wāhi Toiora, seem to illustrate our property as both Wāhi Toitū and Wāhi Toiora.



Figure Two: Excerpt from Diagram 5 of the FDS



Figure Three: Excerpt from Diagram 6 of the FDS

And then additionally to that Diagram 10 shows the yellow Priority Development Area over some of the areas that Diagram 5 says are Wāhi Toitū (areas protected from new development).

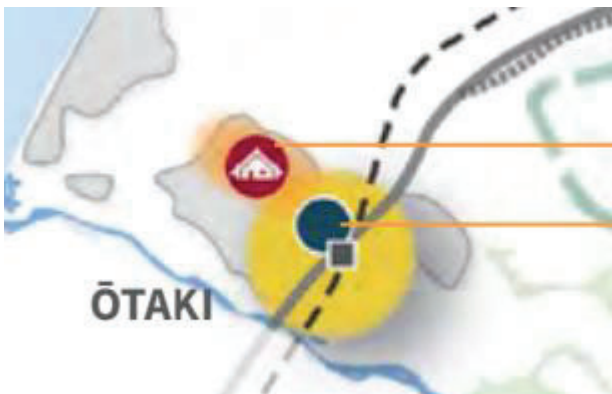


Figure Four: Excerpt from Diagram 10 of the FDS

The inflexible language and presentation of the FDS, and in particular the explicit non-support for developments that are not included in the list of five areas that will be prioritised for development (refer Diagram 7 of the FDS) is of concern to us as landowners. This is particularly so given the lack of information provided on constraints and how they have been determined for any particular area.

Outcome Sought

We seek that our land at 12 Waitohu Valley Road be included in the Ōtaki Priority Development Area and believe that to do so is in keeping with, and gives effect to, the Vision and Strategic Direction of the FDS.

Mark McIntyre

9 November 2023

Wellington Regional Leadership Committee Secretariat
C/O – Future Development Strategy Lead
PO Box 11646
Wellington 6011

By email: future.developmentstrategy@wrlc.org.nz

Re: Submission on Draft Future Development Strategy from Peka Peka Farm Limited

Thank you for the opportunity to make a submission on the Draft Wairarapa-Wellington-Horowhenua Future Development Strategy (“FDS”). Peka Peka Farm Ltd (“PPFL”) would like to be heard in support of this submission.

PPFL owns a 138.7 hectare landholding at Peka Peka. The land is zoned for rural purposes but its utility for productive use is limited. The land is adjacent to the existing Peka Peka urban area. The existing urban area at Peka Peka is situated slightly to the north of the main urban area of Waikanae and is presently relatively poorly serviced by infrastructure, including transport infrastructure.

PPFL is investigating future development opportunities for the site, including urban development. The site presents a range of development opportunities, as well as significant opportunities for ecological restoration including of large wetland areas and stream enhancement. There are also opportunities to enhance mana whenua values on the site, and PPFL has been actively engaging with Ātiawa ki Whakarongotai and Ngāti Raukawa about its future plans and how these plans could also assist to achieve some of the cultural aspirations of these entities. This engagement with iwi has been constructive, is ongoing, and has been positively received.

Notwithstanding that it is a greenfields site, development of the PPFL land would assist to consolidate the urban area at Peka Peka, provide critical mass to enable local services and transport links to establish in order to service both the existing urban area at Peka Peka as well as the proposed development area, and act as a catalyst for additional infrastructure that could also enable densification of the existing urban area. It would also provide an elevated and resilient area of urban zoned land that could be utilised to assist with managed retreat from natural hazards (such as inundation), should that be necessary in the future.

The PPFL landholding is shown in Figure 1 below.

Attachment 1 to this submission provides further detail on the development opportunity provided by Peka Peka Farm.

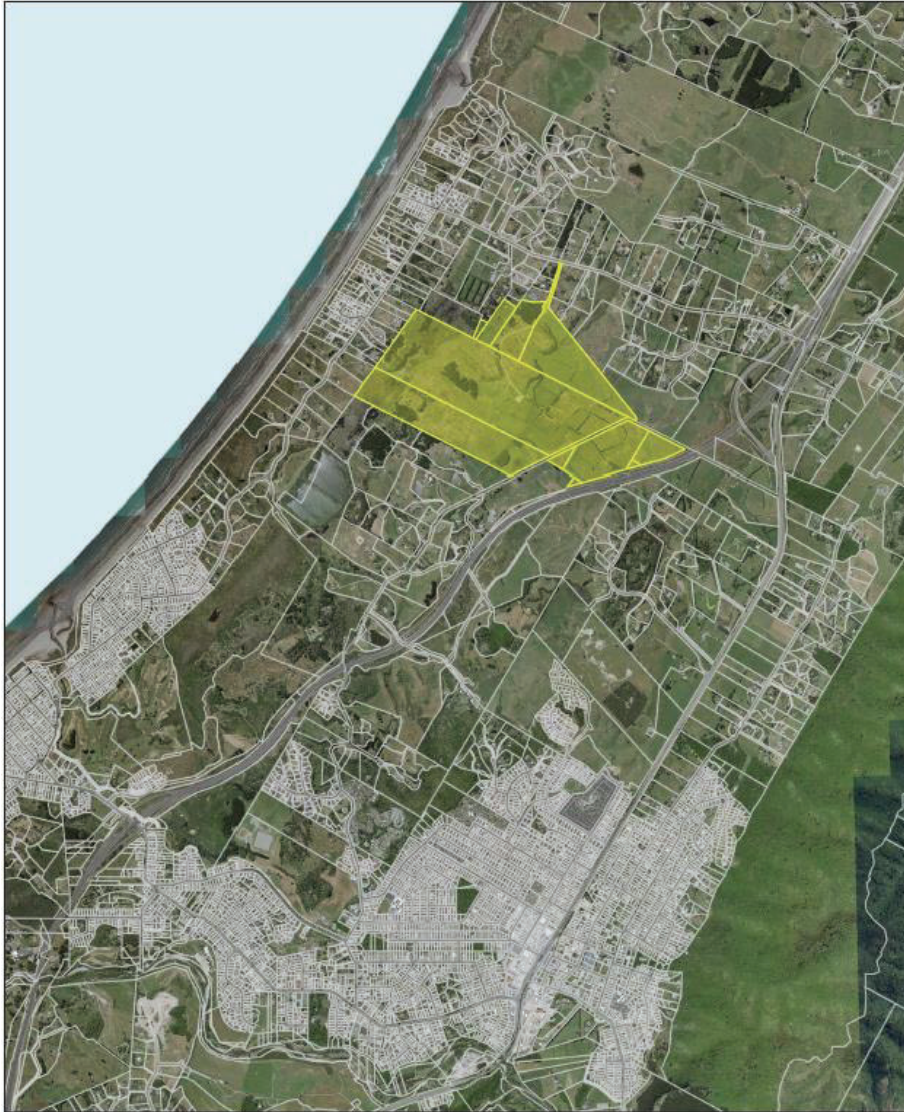


Figure 1. The Peka Peka Farm Ltd landholding.

PPFL is concerned that the draft FDS takes an unnecessarily restrictive position in respect of new greenfield land. Greenfield development must continue to be an ongoing contributor to meeting the region’s housing needs. To not do so, is to artificially constrain land supply in a manner that is not supported by the National Policy Statement on Urban Development (“NPS-UD”).

At a local level, the Hearing Panel that heard Plan Change 2¹ to the Kāpiti Coast District Plan, made the following observation in their recommendation report:

“The Panel is somewhat sceptical that the MDRS will yield the additional household capacity by intensification that the Council currently projects. Greenfield development must be in the mix to meet the district’s housing needs. We do not recommend the adoption of many rezoning requests. However, most submissions on re-zoning addressed in this report had very sensible ideas for greenfield

¹ Plan Change 2 gave effect of the requirements of the NPS-UD and the Medium Density Residential Standards in the Kāpiti district.

development if proposed planned using well-conceived structure plans to manage the opportunities and constraints the site presents...The Panel's view is that PC2 will not meet the Council's required supply of land for housing is supported by the evidence of Kāinga Ora and also the following statement from Mr Foy on behalf of the Mansell family... "

This extract highlights the ongoing role of greenfield development in providing for sufficient development capacity in Kāpiti (noting that this requirement will likely apply to other districts), supporting the competitive operation of land and development markets, enabling well-functioning urban environments and providing for a range of housing choices to meet a variety of household needs.

This is not to downplay the role of intensification and redevelopment within existing urban areas. Rather, it is a need to provide for both, as complementary measures, and therefore to meet the housing choice needs through the provision of a range of household types.

The position taken by the FDS overly elevates the role of intensification and redevelopment within existing urban areas. Coupled with recently notified changes to the Regional Policy Statement ("RPS") and the Natural Resources Plan ("NRP"), the net effect is to create a de facto urban limit for the region. Such a position is not supported by the NPS-UD.

Housing and Business Capacity Assessment

The Housing and Business Capacity Assessment ("HBA") released alongside the FDS, projects a need for an additional 99,302² dwellings over the 30 year period to 2051. PPFL notes, as acknowledged by the HBA, that there is some uncertainty around these population projections. The current projections from Sense Partners are significantly lower than the previous iteration that was issued. As immigration numbers rebound following the Covid-19 pandemic, it is entirely feasible that future projections may again return to higher levels.

At section 1.11 of the HBA, a realisable capacity of 206,613 dwellings is reported across the region plus an additional 7941 greenfield dwellings that "were not part of the model". This would suggest a total of 214,554. However, at Table 1.14, the footnotes to the table appear to suggest that a total of 7941 dwellings do form part of the overall total of 206,613.

Table 1.15 then reports the realisable development capacity, split by district, for urban capacity and greenfield capacity. However, when added together, the total realisable capacity reported by this table is 219,880, some 13,267 dwellings more than the realisable capacity number originally reported.

Then at Table 1.16 a different capacity number is reported again, this time 219,314, some 12,701 dwellings higher than the number originally reported. This casts some doubt over what is being reported by the HBA.

Notably, and putting aside the various numbers being reported, some 85.4% of future development capacity is expected to occur from realisable capacity within existing urban areas. PPFL considers that this number is optimistic. And while the feasible development capacity that is reported does not appear to be broken down by greenfield vs. brownfield, some 68% of feasible capacity overall is expected to be realisable.

PPFL understands that the reported realisation rate (or wider HBA findings) have not been tested with the development community and considers this to be a weakness in the reported methodology. Sense checking the reported capacity numbers is a necessary step to test the robustness of the findings. Significant policy decisions,

² Accounting for the competitiveness margin required by the NPS-UD.

such as on the FDS, are being made in reliance on the HBA findings. It is noted that the Clause 3.21(1)(a) of the NPS-UD states that in preparing an HBA, comment must be sought from people expert or experienced in the development sector. This does not appear to have occurred, aside from the economic modelling of capacity undertaken by Property Economics. No active developer has been involved in sense checking these numbers.

PPFL is also concerned about the degree to which the realisable development capacity that is being reported, and particularly the increased capacity reported as a result of upzoning from the MDRS and the NPS-UD, has been tested for its serviceability from an infrastructure perspective. This is a necessary step in determining the infrastructure readiness of this development capacity. The HBA notes that there are limitations relating to data and modelling, necessitating a qualitative assessment of overall infrastructure-ready development capacity.

The reported capacity numbers are important in informing the policy direction that the FDS seeks to set. There needs to be confidence in the HBA numbers that are reported, and PPFL is concerned that the infrastructure assessment of these numbers is insufficient.

The modelling underpinning the HBA is complex, time-consuming and costly. What has been released as part of the HBA, particularly in respect of realisable capacity, provides a general overview but the underlying calculations are sparse. A more granular explanation of the assumptions and methodologies would enable a more detailed review of the HBA findings. PPFL is not in a position to replicate this modelling in order to test it. However, there appears to be enough uncertainty in the reported numbers that raise questions as to what is being reported. The absence of any developer testing is concerning, along with the rigour of the infrastructure assessment.

Again, the HBA forms an evidence base for a number of significant policy decisions that will have the effect of significantly limiting the role of greenfield development in providing for future development capacity. This will have the effect of constraining land supply and significantly increasing reliance on intensification within existing urban areas to meet future housing needs. Such a position is not supported by the NPS-UD.

PPFL seeks that its landholding is recognised in the FDS as an area of potential greenfield land supply. In addition to that change, PPFL seeks that the FDS better recognise the role of greenfield development as an important facet of meeting housing requirements in the region going forward, and to take a less restrictive position to the consideration of appropriate greenfield development.

Constraints Layers

The FDS and its supporting Constraints Report identify two levels of constraint:

- Wāhi Toitū; and
- Wāhi Toiora.

The Constraints Report notes that it is intended for spatial planning purposes only, and is not intended to substitute for local level assessments, but then goes on to note that Wāhi Toitū areas are to be protected from new urban development.

The resultant mapping of all of the component parts, albeit at a very broad scale, would significantly constrain future greenfield development by causing an inconsistency with the FDS through a direction to protect these areas from new urban development.

Wāhi Toitū areas include a range of matters, including:

- Existing environmental protections – areas protected by National Policy Statements, National Environmental Standards, Natural Resources Plan, and Regional Policy Statement; and
- Highly productive land.

Both of these matters often have consent pathways available for activities to occur by way of a resource consent and/or plan change. To present them as Wāhi Toitu areas is resultingly inappropriate and PPFL seeks that they should be classified as Wāhi Toiora areas.

Relationship with changes to the Regional Policy Statement and Natural Resources Plan

The NPS-UD requires that local authorities are responsive to proposals that would supply significant development capacity³, even if that development capacity is unanticipated by planning documents, or out of sequence with planned land release.

Proposed Change 1 to the RPS seeks to provide some policy direction on how this is to be achieved, and PPFL is engaging in that process. However, the FDS as presently proposed takes a policy position that limits greenfield development, and is inconsistent with this direction from the NPS-UD. For example, it states:

“The main proposal in this draft Future Development Strategy is to concentrate most of our development in existing urban areas in our towns and cities with good current and future transport links.”

It also notes:

“Whilst we understand that District Plans allow for development outside these prioritised areas, the Future Development Strategy does not support development that does not meet these prioritised areas.

...

Over the next 30 years we expect 82% of our housing development to be in brownfield areas and 18% to be in greenfield areas.”

Greenfield development is in turn ranked as the lowest priority area for future development.

Proposed Change 1 to the RPS contains Policy 55 which is a consideration policy applying to greenfield development beyond the existing urban area, and requires consideration of the whether the greenfield development:

*“...
(b) it is consistent with the Wellington Region Future Development Strategy or, if the Future Development Strategy has not been notified, the regional or local strategic growth or development framework or strategy that describes where and how future development will occur in that district or region.
...”*

The policy position taken by the FDS is such that it would be very difficult to assess any future greenfield development that is not otherwise identified by the FDS as being consistent with this policy. Again, this is

³ Objective 6(c) and Policy 8.

inconsistent with the NPS-UD, in particular the requirement to be responsive to unplanned or out of sequence development.

The more recent Proposed Change 1 to the NRP, applicable to Wellington, Lower Hutt, Upper Hutt and Porirua city boundaries, includes proposed Rules WH.R13 and P.R12. These rules seek to provide for stormwater from new unplanned greenfield development as a prohibited activity. Any unplanned greenfield development would therefore require a plan change to the regional plan, alongside a change to a district plan. Such an approach is fundamentally at odds with the requirement of the NPS-UD, in particular the requirement to be responsive to unplanned or out of sequence development that provides for significant development capacity.

Taken together, the policy position being adopted is tantamount to an urban limit, and a high threshold to overcome.

Prioritisation and Sequencing

The FDS seeks to prioritise development in this order:

1. Areas of importance to iwi for development;
2. Growth along strategic public transport corridors;
3. Priority Development Areas;
4. Within existing rural towns around public transport nodes and active mode connections;
5. Greenfield developments that are well connected to existing urban areas in our towns and cities, can be easily serviced by existing and planned infrastructure (including by public and active transport modes), and where the location and design would maximise climate and natural hazard resilience.

PPFL supports the identification of areas of importance to iwi. However, for the reasons outlined above, considers that the FDS overly limits the role of greenfield development and overly emphasises the role of intensification. A better balance needs to be struck that recognises the risk of relying so significantly on intensification.

PPFL also questions the ability to phase development in the manner proposed by the FDS. There are a number of significant assumptions underpinning this work that will depend on the decisions of a multitude of individual landowners. This matter also goes to the realised development that is expected to occur from within existing areas as discussed above.

Summary

PPFL is concerned that the FDS takes an overly restrictive stance on the ongoing role of greenfield development in meeting residential demand, including in providing for housing choice for a range of housing types. Coupled with proposed changes to the RPS and NRP, the emerging policy position will make further greenfield development extremely challenging, and is contrary to the requirements of the NPS-UD.

PPFL supports the importance of iwi aspirations in urban development, and has been engaging closely with iwi in its own development plans including in significant ecological restoration plans.

Kind regards,



Paul Turner
Director
Peka Peka Farm Limited

Attachments.

1. Peka Peka Farm Presentation.



Peka Peka Farm

A growth and ecological opportunity

Submission to Wellington Regional Leadership
Committee

McIndoe Urban

local



ocd1



RMA ECOLOGY¹⁰

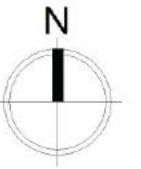
Heritage Solutions



BELL GULLY



The Site & Opportunity



Key Outcomes

- Up to 1250 dwellings
- Connected community
- Wetland restoration
- Iwi partnership to support cultural aspirations

Our Goal: *To create an exceptional urban environment that celebrates culture, fosters community, enhances ecological and freshwater systems, and promotes a high quality of life through connectedness to the land, its people and places.*



- Working with ecologies and landscape
- Enhancing water management
- Creating a high-quality public realm

- Partnering with Mana Whenua
- Achieving diverse housing types and character areas

- Providing integrated recreational facilities and access
- Creating a connected community
- Achieving diverse housing types and character areas

Proposed Masterplan



KEY FEATURES

- An archipelago of high-amenity development
- Diversity is key - A range of housing types and densities to serve different segments of the community.
- A local centre and large playground
- Landscape and ecological restoration and enhancement
- A network of pathways and internal connections
- Future connections to the south
- An Expressway walkway and cycleway connection



Proposed Yield

639 – 1,158 standard lots

90 large lots

Total yield 729 – 1,248 lots

Western Dunes

Central Flats

Eastern Dunes

140

Housing Typologies

Peka Peka Farm will contribute a range of housing types, providing choice and meeting the diverse needs of various segments across the community

Range of residential typologies includes coastal lifestyle, traditional density, terraced housing , affordable housing.

Meets the diverse needs of different segments of the regional population, including:

- Workers and families seeking a better lifestyle.
- Retirees / pre-retirement wanting to sell down but not move into a retirement village.
- Young families and those looking for more affordable options.
- Lifestylers seeking a coastal lifestyle and a larger land size.

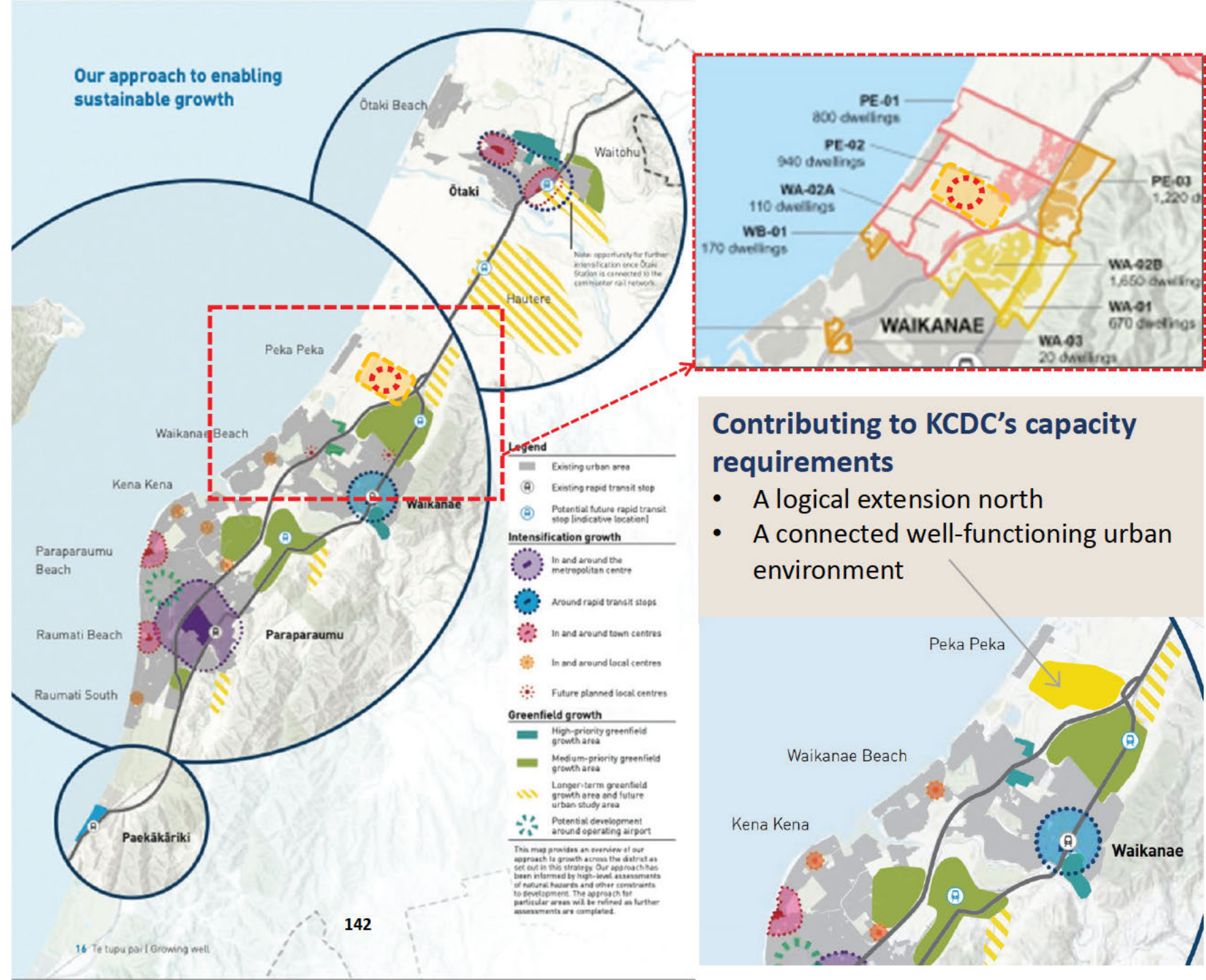


Site in context



Our plan will be strongly grounded in our six growth principles:

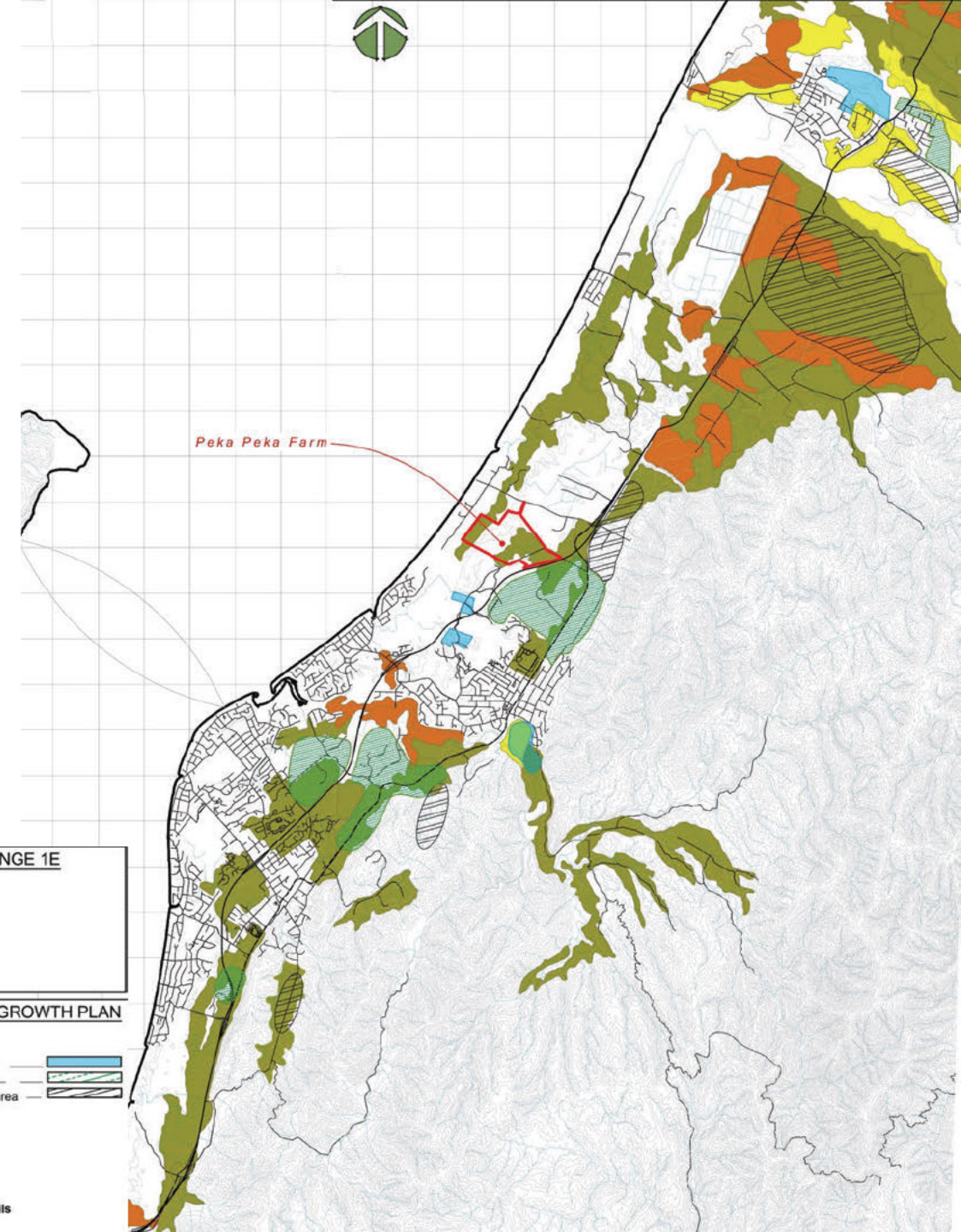
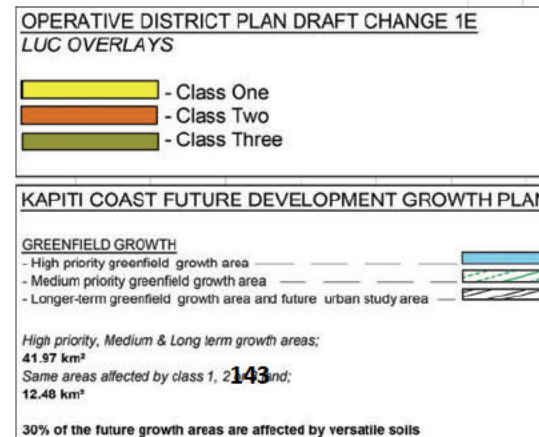
- supporting Mana Whenua aspirations
- valuing our environment
- fostering strong communities
- encouraging low-carbon living
- embracing the opportunities of growth
- enabling choice.



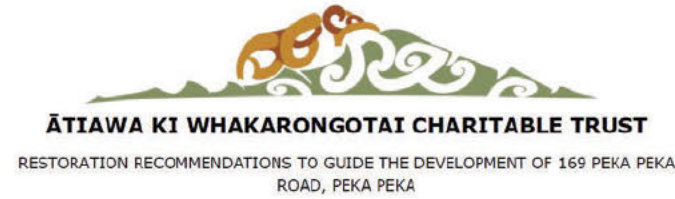
KCDC growth & LUC overlay

Residential potential realisable notwithstanding NPS-HPL.

- 30% of KCDC growth affected by LUC 1, 2, 3
- 35% of high priority, medium term growth affected by LUC 1, 2, 3
- Pockets of LUC3 proposed to be residential are fragmented and not economically viable for farming



Supporting tangata whenua aspirations – a partnership



Partnership with Ātiawa ki Whakarongotai Charitable Trust to:

- Co-design ecological restoration
- Reinststate Ngārara stream
- Reinststate native mahinga kai species
- Reinststate native harakeke and toe toe wetland
- Provide for mana whenua access to cultivate resources
- Implement cultural inputs and narrative into design and place creation
- Economic and educational opportunities



A profound ecological restoration opportunity

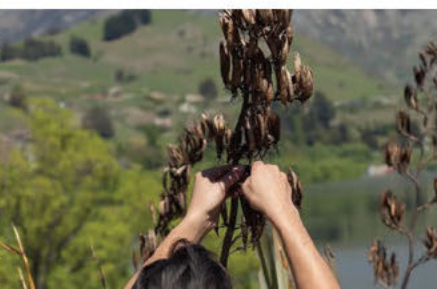
Ecological restoration outcomes:

- 15.5 ha* ecological sanctuary
- 19 ha* restoration area for active recreational engagement
- Enhancement planting to Te Harakeke wetland and other existing wetlands
- Dune restoration and enhancement planting 17.5 ha*
- Harakeke harvesting area, 1.4 ha*
- Restoration of existing watercourses

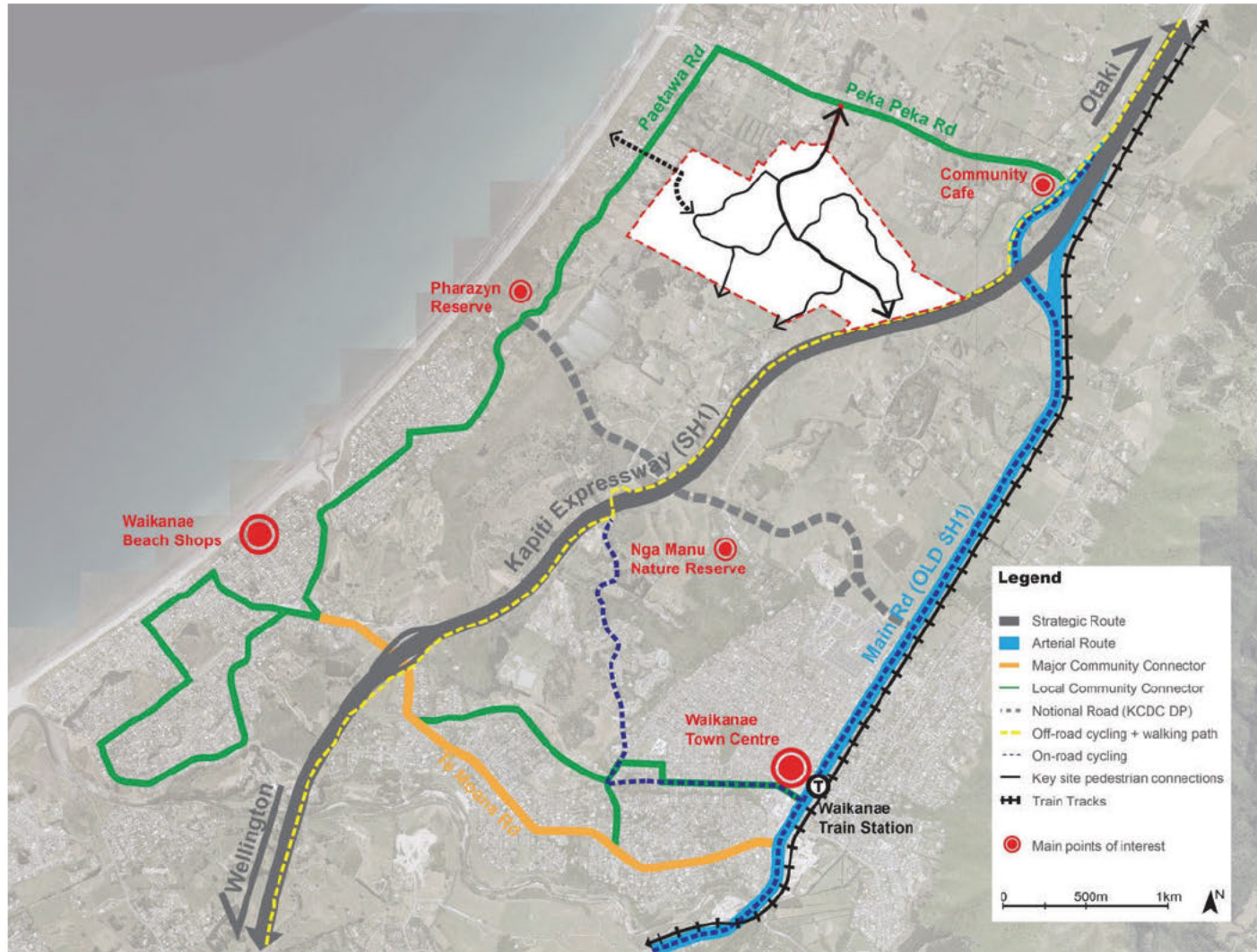
(* Calculations subject to detailed testing)



- 1. Te Harakeke Wetland.**
 - Manage as wildlife area
 - Plant up and manage 20 m buffer to wetland.
 - Remove weeds, buffer plant, install pest animal control stations
- 2. Cultural area**
 - Pa harakeke & pingao plantings
 - Easy access for maintenance and harvesting
- 3. Public access wetland area**
 - Manage as public amenity access area
 - Boardwalks/ paths
 - Signage/ interpretation
 - Restore wetlands being mindful of public safety & amenity
 - Wetland/ stream function restoration e.g. re-meander stream, create wetland amenity areas
- 4. Wetland sanctuary**
 - Managed central area principally for wildlife
 - Manage this as a matrix of permanent water, deep pools, high wetland edge ratio, dry 'islands' for shrubland planting & forest bird roosting/ nesting, and fernbird/ bittern use
 - Focus habitat create for mud fish and kokopu – that may involve manipulation of water levels to benefit wildlife (and flood management uses)
 - Assumed to flood regularly & have large areas of season ally dry wet areas
 - No boardwalks or cycle paths within sanctuary
 - Develop wide channels to encircle site to make people & domestic pet access difficult
 - Have a 30m (min) ecological buffer to all sides that allows for public access and amenity
- 5. Dune Hill tops**
 - Manage as ecological restoration areas
 - Paths for public access
 - Public viewing areas with Signage/ interpretation



Connecting communities



Integrating transport and low carbon living

- Enhanced community connectedness
- On demand shuttle bus service to Waikanae
- Integration of electric vehicle and bike charging
- Car share hub
- Integration with existing active mode cycle and walkway along SH1
- Proximity to future commuter rail expansion at Peka Peka
- Support a move to low carbon living
- 10-15 bike to Waikanae centre and station
- Commercial centre, working hub and playground amenities
- Consistency with KCDC Sustainable Transport Strategy

Efficient transportation connections

- No significant traffic issues identified.
- A safe intersection can be established at the Peka Peka Road access point.
- Existing connector roads to West and South have sufficient capacity to accommodate the extra traffic.
- Opportunities exist to establish direct connections south to Ngarara Rd via the paper road, and active mode to Paetawa Road



Stantec

Mark Georgeson
Transportation Operations Leader – New Zealand

A significant community hub & recreation asset

1



2



3



Scenario 1: Southern Wetland sanctuary with public access to perimeter and harakeke / playground linked to community heart.

Scenario 2: Split Wetland sanctuary.

Scenario 3: Southern Wetland sanctuary with no public access and increased amenity to North.

Key:

— Pedestrian paths and boardwalks	Harakeke and Pingao Planting	Playground Area
— Streams	Wetland Sanctuary	Community Gardens
Lowland Ecological Zone	Playing Field	

Peka Peka Farm will create a well-functioning urban environment:

- Support tangata whenua aspirations
- Provide profound ecological benefits
- Provide an outstanding living environment
- Support a low carbon lifestyle
- Enhance water management and resilience
- Provide generous community facilities
- Contribute positively to regional housing deficit
- Provide housing choices to serve a broad demographic

Parvati Rotherham

From: [REDACTED]
Sent: Thursday, 9 November 2023 4:58 pm
To: futuredevelopmentstrategy
Subject: FDS submission

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PLEASE KEEP MY DETAILS PRIVATE

Submitting only as myself

Overall note: as there is no option for “support and want it to go harder” or “do not support because it’s not strong enough”, I have been forced to tick “support” throughout.

Q1: vision and strategic direction

I support the vision and strategic direction but especially the Mana Whenua statement of values and aspirations because it’s a very basic start. The direction should have prioritised or weighted objectives, particularly equity and emissions reduction, so it was able to start inducing a paradigm shift in how we manage urban development.

Q2: Our plan for where we develop housing...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply the three initiatives (1-3) in the Talk Wellington post.

<https://talkwellington.org.nz/2023/wellingtons-future-development-strategy-your-submission-guide-quick/>

Q3: No comment

Q4: key infrastructure...

I do not support the proposal because it is not strong enough. I wish to see the FDS apply the three initiatives (1-3) in the Talk Wellington post.

Q5: limit or avoid development...

I do not support this proposal as it seems unlikely that public subsidy will be withdrawn for slated greenfield areas. If it were to be, I would support this proposal.

Q6: iwi and hapu values and aspirations

I support these and the FDS would do well to take on their ambition.

Q7: what else is important:

It's crucial that we take this opportunity to forward plan our urban spaces to best meet the needs of people and the environment.

Wellington Regional Leadership Committee
c/- Greater Wellington Regional Council
submitted electronically via Have Your Say

9 November 2023

Submission on the Future Development Strategy

Horowhenua District Council supports the Greater Wellington Region's Future Development Strategy (FDS). We appreciate the opportunity to be included in this FDS, in recognition of our relationship to the Greater Wellington region and our previous inclusion in the Wellington Regional Growth Framework. We expect that this relationship will only grow as a result of the planned Ōtaki to North of Levin extension to the Northern Corridor, as the road becomes safer and travel times decrease.

We support the overarching strategic direction of the Draft FDS. Planning for future growth in a co-ordinated and integrated manner is important to achieve sustainable development in our District. Identifying priority areas so that future residential and business growth, and the social and physical infrastructure needed to support it can be directed and encouraged towards areas that are well located in terms of existing settlements, existing services and public transport, where available, is an appropriate means to do this. We note that the Horowhenua District is currently under-served by public transport and support any measures to increase our current services.

We support identifying constraints and land that isn't suitable for future development, and directing future growth away from such areas. Similarly, we support providing infrastructure such as stormwater, wastewater, drinking water, road, rail, cycleways, electricity and social infrastructure such as schools and hospitals in the most well-functioning and cost-efficient ways possible.

We support Te Tirohanga Whakamua, the statement of iwi and hapū values and aspirations for urban development in our Region. As Te Tirohanga Whakamua was created by WRLC iwi members, including those representing our iwi partners in the Horowhenua District, we support its inclusion in informing the development of the Draft Future Development Strategy.

We note however, that whilst we have three areas within the Levin area identified for future urban growth in the Draft FDS, that we may seek to grow our towns and settlements outside of the areas identified in the Draft FDS. We have had high rates of growth over the past ten years, and have recently re-adopted the 95th percentile Sense Partners growth estimates as the basis for our Long Term Plan 2024-2044 projections. Growth at this level means that we may seek to grow settlements which were not able to be included in the Draft FDS as they do not meet the threshold for being 'urban' areas in terms of the NPS-UD (ie those settlements with a population of under 10,000 people) or we may seek to direct development to parts of Levin not identified in the Draft FDS. As a District, we have room to grow – flat land that is relatively unconstrained in terms of Natural Hazards, and our Growth Strategy has proactively identified a number of growth areas that may be suitable for growth within a ten year horizon.

Furthermore, Horowhenua District Council wishes to affirm that ultimately, our District is shaped by our District Plan and the associated rules, which will determine the type of activities that can establish within our District. Whilst land may be identified for future residential and business land growth in the Draft FDS, Horowhenua District Council will seek to ensure that commercial and industrial activities in particular are prioritised within the business areas. Given the long-term negative social effects of some of the government institutions that have historically been located in our District, we will prioritise industrial and commercial activities within our identified business areas over any other activities being provided for.

We wish to be heard in relation to this submission.

Yours Sincerely

A handwritten signature in black ink, appearing to read "David Allan". The signature is written in a cursive style with a large initial "D" and a stylized "A".

David Allan
Deputy Mayor



Wellington Regional Leadership Committee Secretariat
c/o Future Development Strategy Lead
PO Box 11646
Wellington 6011
Via email: future.developmentstrategy@wrlc.org.nz

09 November 2023

**SUBMISSION ON THE WAIRARAPA- WELLINGTON-HOROWHENUA DRAFT FUTURE
DEVELOPMENT STRATEGY BY THE GUILDFORD TIMBER COMPANY LTD.**

Dear Future Strategy Development Team,

Please find **attached** a submission by the Guildford Timber Company Ltd on the Wairarapa-Wellington-Horowhenua Draft Future Development Strategy including completed submission form and full submission. We have also provided three appendix's to this submission which are contained in the hyperlink below due to file size.

Regarding the hearing GTC would like to present to the hearings committee, preferably from the Wellington location.

Please contact me in the first instance, should you wish to discuss the submission.

<https://www.dropbox.com/t/cE2e8sD3MPaoSCo>

Regards,

A handwritten signature in black ink, appearing to read 'M Hall'.

Michael Hall,
On behalf of the Guildford Timber Company Ltd



MICHAEL HALL

URBAN SPACES LEAD

m: [REDACTED] e: [REDACTED] w: www.awa.kiwi

Guildford Timber Company Submission on the Wairarapa- Wellington-Horowhenua Draft Future Development Strategy – Part 1 response to website questions, Part 2 detailed submission.

PART ONE response to website questions

Question 1: Do you support our vision and strategic direction that guides the draft Future Development Strategy?

Don't support

Tell us why:

Guildford Timber Company (GTC) is primarily interested in how it's current land holdings can effectively contribute to the growth and prosperity of the Wellington Region, specifically the Hutt Valley. Silverstream Forest which would provide for the Southern Growth Area is owned by GTC. GTC has had a long-standing vision to create sustainable residential housing in its forest, where people can live closer to nature.

It has a long history and involvement in Upper Hutt and how Upper Hutt can provide for affordable housing choice across the region, along with providing for forestry over many decades. Over the last 15 years it has in parallel been planning for a future development of the land post the removal of the latest forestry plantation, which will be occurring over 2023-24. This vision has been planned for and articulated through the Southern Growth Area (SGA). The planned for residential development aims to deliver housing that is affordable and meet best practice urban design standards. It can deliver on the wider communities needs in Pinehaven and Silverstream through provision of housing and allowing submarginal rural land to be either replanted for ecological restoration and improve parks and reserve assets.

The proposed vision and strategic direction of this draft Future Development Strategy (FDS) does not include the SGA and as a result does not adequately recognise the investment and planning work that has gone into providing for this greenfield level of development that provides for future housing choice in the region. GTC requests that the Southern Growth Area is able to be included into the 2023 Future Development Strategy as a prioritised future development greenfield area. The existing planned infrastructure and type of development form being planned for the SGA meets the intent and outcomes of the FDS. There is already planned infrastructure to be delivered by the Upper Hutt City Council in the UHCC Long Term Plan (LTP) and additional documentation outlining the anticipated housing outcomes. Our request is informed by additional economic analysis undertaken by Formative Limited. This analysis is provided in Appendix A. A summary is provided below:

- The site is currently in mature production forest (pines)– with large areas due to be harvested in the short-medium term. Development of the SGA is intended as the post-harvest use of the land, transitioning from forestry land to residential development. If the SGA is not recognised in the FDS as planned development, and the owners have no option but to replant the land as a production forest the opportunity to use the land for residential may be lost for another 30 years.
- This assessment has shown that the SGA has long been planned as a future greenfield residential growth area in Upper Hutt since 2007, and should continue to be recognised an appropriate location in which to accommodate growth. The SGA is well located adjacent to the existing Upper Hutt and Silverstream urban area, is close to mass rapid transit, and arterial roading infrastructure, and has a willing and financially capable landowner who is prepared to advance development of the area in liaison with Council.
- The HBA appears to conclude that the SGA is not required to adequately provide for the City’s residential growth needs, however there are key errors in the HBA and the non-consideration of several supply constraints indicate that there may be a residential dwelling supply shortfall in the future, if the SGA is not identified in the FDS.
- Council should take steps to mitigate against the likelihood that it has underestimated future demand, and overstated dwelling capacity, and Council should adopt a precautionary approach (including through the FDS) to providing sufficient residential capacity to accommodate future growth. The Draft FDS does not take a precautionary approach, and it is very likely to constrain future growth in Upper Hutt, with adverse effects on housing affordability and choice.
- Omitting the SGA from the FDS would make it very difficult to develop the SGA for residential uses until a change to the FDS was made, whereas including it has little economic downside, and would enable the area to be brought online as required in the future to ensure ongoing adequate residential dwelling supply and choice. One potential downside of not including the SGA in the FDS is that there will be a future shortage of dwelling supply in Upper Hutt, with adverse effects on housing affordability (in terms of planned affordable housing provision within the SGA and choice, with a very strong reliance place on higher density brownfields developments, which in the emerging political climate are likely to be the very type of dwelling typology that becomes unfeasible or contrary to new planning policy.

In summary, GTC opposes the current form of the draft FDS for the following reasons:

- Southern Growth Area (GTC land) should have been identified as a prioritised area for development in the FDS – it has been excluded and no reasons provided.
- Does not appear to have been considered and no reason given for its lack of inclusion.
- This land has been through two masterplan processes first in 2007 and more recently in 2021 – the Silverstream Forest Masterplan (SPA) it has also been the subject of a joint Infrastructure Accelerator Fund application with UHCC in 2020 which included assessments for all required infrastructure and demonstrated that the site could be serviced.
- The area has long been recognised in relevant growth strategies including the Wellington Regional Growth Strategy 2021.

- Planning for infrastructure to support GTC has been undertaken at a plan level by UHCC via plan Change 43 (stormwater/ flooding) and associated works, Proposed Plan Change 49-Variation 1 -to provide to infrastructure and services (roading access, utilities, network utilities and water reservoirs for the Southern Growth Area and provision for growth related infrastructure (water reservoir and Silverstream bridge upgrade) including expenditure for this infrastructure in the UHCC LTCP 2021-2035 (adopted in 2022).
- Considerable work has been completed since the delivery of the first Guildford Framework Development in 2007 which set the foundations for inclusion in the 2007 Urban Growth Strategy. This work has also included:
 - In 2017 GTC strategically purchased 44 Kiln Street for improving the viability of access to the site.
 - GTC has also engaged Studio Pacific Architecture and Envelope Engineering Limited to reconfirm and further detail the vision of the site and confirm how infrastructure can be provided for in 2021. This work has been used to inform future growth planning with Council and confirm the suitability of the site, including demonstrating the serviceability of infrastructure and appropriateness of the site for development The masterplan also confirms how the site can contribute to the existing ecology and urban fabric of the Pinehaven and Silverstream suburbs.
- It meets all the criteria for inclusion in the FDS. It would provide a significant number of additional dwellings of up to 1600 households, and considerable testing has been undertaken in the concept plan to confirm whether affordable housing could be provided within each of the village hubs proposed in the growth area which are high quality and meet good urban design principles.
- The site sits between Silverstream and Upper Hutt existing urban areas and is able to be well connected with commuter cycling connections, connections to the Silverstream Railway Station and provision of recreational tracks for all residents through the area. The proposed development would focus urban form and street design around public transport nodes and further strength economic activity within the Silverstream Town Centre, meeting the FDS prioritised Development Area assessment criteria.

GTC consider that its land should have been identified as a Priority Development Area in the draft FDS, it is strategically located connecting urban areas of Upper Hutt and Silverstream and has been part of Upper Hutt's Residential Growth Planning since 2007, known as the SGA. The Draft FDS and supporting documents fail to consider the SGA and give no reason why their land was omitted from the final draft. It is understood that UHCC supported reference to this area in the FDS as a Future Urban Development Area in earlier draft versions and do support the future planned development of the SGA for residential.

Question 2: Do you support our proposal to prioritise housing development in our existing towns and cities and around our strategic transport network i.e. around current and future transport hubs and routes?

Support/ Don't support/Unsure

Tell us why:

GTC supports the intent of this in part, it does support development that supports existing transport connections. It notes that unlike many greenfield sites in the district, the SGA is well located as the last undeveloped track of land between the urban areas of Silverstream and Pine haven with good accessibility to the Railway Station, bus routes and motorway. When well-located greenfield development can provide for good extensions and support of public transport into key transport nodes.

The SGA is well connected to existing transport routes and connections. This has been planned for and implemented in the Appendix B Silverstream Forrest Concept Masterplan (SPA 2021) for the development of the Southern Growth Area, which provides for walkable community villages with access to public transport that feeds into the existing transport hub of Silverstream railway station.

Question 3: Do you support our proposal to prioritise business development in our existing towns and cities and around our strategic public transport network i.e. around current and future transport hubs and routes, to provide for sustainable, local employment?

Support/ Don't support/Unsure

Tell us why:

This is supported by GTC.

Question 4: Do you support our proposed approach to invest in infrastructure that is located in existing towns and cities and around current and future transport hubs and routes?

Support/ Don't support/Unsure

Tell us why:

Yes this is supported in principal. The proposed infrastructure outlined in the Future Development Strategy is also consistent with the infrastructure required to support the development of the Southern Growth Area, and that has been planned for by UHCC. This include the work done via the UHCC District Plan (Plan Changes 43, 49 variation 1 and intended rezoning GTC is seeking via Proposed Plan Change 50), identification of the SGA as a growth area in the UHCC Long Term Plan 2022 (including planned investment in growth related infrastructure – upgrades to roading/bridge/stormwater capacity and water reservoir tanks in response to this growth.

Question 5: Do you support our proposed approach to protect the areas we love by avoiding or limiting urban development in areas that prone to natural hazards, land that is highly productive or land that contains high cultural or environmental/biodiversity values?

Support/ Don't support/ Unsure

Tell us why:

Our support for this is conditional on there being a strong evidence base that these hazards and ecological matters have been assessed at a site specific level and that avoidance of effects provides the best environmental outcome for managing development which also include social and economic drivers. The vision planned for the SGA (as shown in the Silver Stream Forest Concept Masterplan (Studio Pacific 2021) provides for a well planned residential community that includes open spaces and special amenity areas and ecological areas onsite have been assessed, identified and appropriately managed. In many of these areas the potential ecological restoration sites are on hazard prone land which provides for a suitable land use activity.

Question 6: How do you think we can best support the values and aspirations of Māori in our region through the implementation of the Future Development Strategy?

Support/ Don't support/ Unsure

Tell us why:

GTC has had some engagement with Ngati Toā and Taranaki Whānui historically but they would like to see this relationship strengthened. We have not provided a specific response to this but we have provided our understanding of how Māori may wish to be involved as kaitiaki in the Guildford Concept Masterplan. We also think there could be opportunities for iwi to be involved as housing providers in the communities that are established in the growth area.

Question 7: Do you have any other feedback on the draft Future Development Strategy?

We have provided a detailed submission outlining our response in the attached submission. The following documents are also filed in support :

- Appendix A Wairarapa- Wellington- Horowhenua Future Development Strategy - Economics Assessment relating to Silver Stream Forest by Formative Limited.
- Appendix B Silverstream Forest Concept Masterplan by Studio Pacific Architecture.
- Appendix C 3 waters concept drawings to enable development by Envelope Engineering Limited.

PART 2: FULL DETAILED SUBMISSION ON THE DRAFT FDS

Introduction

The Guildford Timber Company (GTC) is a family owned company that was established in 1926. It has a 90+ year history and association with Upper Hutt and, in particular, with Pinehaven and Silverstream. GTC owns approximately 330ha in the Silverstream/Pinehaven area. Its land comprises the steeper slopes surrounding existing residential areas, and the rolling ridges around the southern and eastern sides of the Pinehaven valley, extending over into Blue Mountains.

Since 1928 the land has primarily been used as a commercial pine plantation. GTC has called its forestry operation Silverstream Forest. More information on the vision of the longstanding owners of the firm is available at the website below:

[About \(silverstreamforest.nz\)](http://silverstreamforest.nz)

GTC has had a long-standing vision to create sustainable residential housing in its forest, where people can live closer to nature. Since 2007, GTC has been looking at ways to rezone its land in order to make this vision a reality. The site is well-placed to provide for much-needed housing supply, given its proximity to the Silverstream shopping centre, the Silverstream train station and bus stops on the Hutt Valley lines, and to State Highways 2 and 58.

Silverstream Forest was first included as a potential residential growth area in UHCC's 2007 Urban Growth Strategy. It is now included as the 'Southern Growth Area' in the Council's 2016 Land Use Strategy and the 2021 Wellington Regional Growth Framework. This development opportunity is one of strategic importance, both locally and regionally. As explained below through its own significant investment in planning for the future and partnership with Upper Hutt City Council over the decades there is a need for the development aspirations in what has been planned as the Southern Growth Area need to be reinstated in the Urban Growth Strategy to provide for affordable and sustainable housing choice for the city and wider regional growth aspirations.

Summary of submission

In summary, GTC opposes the current form of the draft Future Development Strategy (FDS). GTC consider that its land should have been identified as a priority development area in the draft FDS, it is strategically located connecting urban areas of Upper Hutt and Silverstream and has been part of Upper Hutt's Residential Growth Planning since 2007 – known as the Southern Growth Area (SGA).

The site is currently in mature production forest (pines)– with large areas due to be harvested in the short-medium term. Development of the SGA is intended as the post-harvest use of the land, transitioning from forestry land to residential development and has been working towards this with UHCC for almost two decades. If the SGA is not recognised in the FDS as planned development, and the owners have no option but to replant the land as a production forest the opportunity to use the land for residential may be lost for another 25 – 30 years.

GTC opposes the exclusion of its land as being available for future development for the following reasons:

- SGA (GTC land) should have been identified as a prioritised area for development in the FDS – it has been excluded.
- Does not appear to have been considered at all in any of the reports and there is no reason given for its lack of inclusion, failure to do so is wrong and unreasonable.
- The area has long been recognised in relevant growth strategies including the Wellington Regional Growth Strategy
- Planning for infrastructure to support GTC has been undertaken at a plan level by UHCC via Plan Change 43 (stormwater/ flooding scenario testing of a change of land use) and associated works and Proposed Plan Change 49-Variation 1 -to provide to infrastructure and services (roading access, utilities, network utilities and water reservoirs for the SGA)
- Preparations have been made for this growth-related infrastructure in the UHCC LTCP 2021-2035 (adopted in 2022), through the Pinehaven water reservoir and Silverstream bridge upgrade
- Considerable work has been completed over a long period to prepare the land for urban development Master planning, infrastructure reports that confirm the suitability of the site.
- It meets all the criteria for inclusion in the FDS. It would provide for up to 1600 dwellings. The suitability of the site for affordability was tested through it's application for Infrastructure Acceleration Funding using Kainga Ora housing typologies. The design of the site as a result can meet the good urban design principles which is demonstrated through the Studia Pacific Architecture Concept Masterplan.
- The site sits between Silverstream and Upper Hutt existing urban areas is well connected from a public transport and cycling provision and is buildable which his demonstrated through concept engineering work completed by Envelope Engineering Limited.

Southern Growth Area should have been included in the FDS despite support from UHCC

GTC is extremely concerned that there has been no mention or consideration of the SGA in the FDS or supporting documents. It understands from UHCC that it was included in an early draft of the FDS as a future Urban Area but that has been deleted from the notified version. There are no reasons for its exclusions. GTC understands from recent discussions with the Mayor and Planning Policy Manager that UHCC is supportive of the SGA and wishes to see that developed.

GTC considers that the SGA meets all of the Draft FDS and NPS-UD criteria for inclusion within the FDS as land suitable for future urban development. It has included an assessment of that for the Panels consideration in this submission.

Assumptions in the Draft FDS/

GTC do not consider that the HBA and Draft FDS have got the balance between strategically planned greenfield land and brownfield development right.

GTC has undertaken a detailed analysis of the technical reports that have underpinned the draft FDS including commissioning a report from Derek Foy at Formative, who has particular expertise in developing FDS having recently assisted Auckland Council on its FDS. A copy of that report is attached at Appendix A. We note concern that the underlying modelling data that underpins the HBA has not been released to allow for a more detailed examination of the assumptions.

Mr Foy has identified the following key issues with the Housing Business Assessment, that suggest that the outcomes and conclusions are unreliable:

- Upper Hutt is a popular destination for first home buyers and those seeking affordable dwellings in Wellington, particularly among migrant groups, first home buyers, and the elderly. Expected growth in all of these groups throughout Wellington will likely result in strong ongoing dwelling demand growth in Upper Hutt, and a need to provide affordable homes for them.
- There appear to be errors made in the calculations in respect of feasibility vs realisability – this error has the potential to have significant consequences.
- The appeal of Upper Hutt to migrants means that demand may well return to pre-Covid levels more rapidly in Upper Hutt than elsewhere in Wellington, meaning that the HBA demand projections understate future growth.
- The FDS does not identify any Greenfields growth areas in Upper Hutt, although Greenfields areas are likely to become a core focal point of growth in the next decade given the stated policy preferences of the new government.
- The new government's stated intention to scrap LGWM would significantly decrease brownfields residential capacity in Wellington, and require a very large increase in greenfields capacity to replace that reduction, given 41% of Wellington Region's prioritised development capacity over the next 30 years was identified in the FDS as being in that corridor.
- The sufficiency of dwelling capacity in Upper Hutt is questionable given observations made about the HBA assessment, and because the small amount of residential development land that is available is in relatively few landholdings it may be land banked and not developed in accordance with UHCC's expectations.

Mr Foy has also identified the following issues with the Draft FDS.

- FDS does not take a precautionary approach, and it is very likely to constrain future growth in Upper Hutt, with adverse effects on housing affordability and choice.
- In the case of Upper Hutt, an easy and appropriate way of making additional provision for Greenfield land would be through the inclusion of the SGA in the FDS, to safeguard its availability as a future growth area. If the SGA is included in the FDS, there would be limited economic downsides for the City, with the historic identification of the SGA as a future growth area meaning that provision of infrastructure to it is on the Council's radar, as evidenced by the objectives underlying Variation 1 to PC49, which include to enable provision of infrastructure to the SGA.

- Omitting the SGA from the FDS would make it very difficult to develop the SGA for residential uses until a change to the FDS was made, whereas including it has little economic downside, and would enable the area to be brought online as required in the future to ensure ongoing adequate residential dwelling supply and choice. One potential downside of not including the SGA in the FDS is that there will be a future shortage of dwelling supply in Upper Hutt, with adverse effects on housing affordability and choice.

Based on this advice GTC is concerned that:

- The Draft FDS places too much reliance on intensification in the MRT corridor
- It has got the balance wrong in terms of greenfield vs brownfield development.
- It has placed too much reliance on intensification around RMT Corridors that are largely dependent upon implementation of infrastructure as part of Let's Get Wellington Moving – given the change of government this is unlikely to be realised.

Specifically in relation to Upper Hutt City the Draft FDS and supporting HBA have got it wrong. Adopting the Draft FDS in its current form Mr Foy expert view is that it could result in the following risks to the Hutt.

- Increased housing price, through land banking and a lack of different product types
- Failure to consider basis for population growth in Upper Hutt including higher migration than other parts of the region.
- Less choice to suit all potential residents from years 11-30
- Overreliance on development of large amounts of medium density housing in brownfield areas.
- There may be insufficient housing capacity available to meet demand in Upper Hutt.

When considering the overall points above, this results in a substandard outcome, and a very real risk that the Draft FDS will fail to achieve its objectives. In doing so GTC considers that the Draft FDS may fail to meet the objectives of the NPS-UD, including the requirements of an FDS.

In terms of Upper Hutt City Council, that has no greenfield FDA it is appropriate to recognise the continued role of the SGA through the FDS for the following reasons:

- It mitigates the risk of some development uptake occurring in existing urban areas not being realised

- The Southern Growth Area would strengthen and provide for more open space and an ecological biodiversity which is critical to support an increase in apartment typologies in the Silverstream area.
- It finalises and provides a clear urban boundary and better utilises sub marginal land
- Overall there are no downsides to the inclusion of the Southern Growth Area.

The second part of this submission provides the background to the Southern Growth Area and reasons in support of GTC's request that it be recognised in the FDS.

Planning history of the Southern Growth Area

The Southern Growth Area has been planned since at least 2007. Throughout that time Upper Hutt City Council and GTC have worked together to plan for the transition of this land from forest to housing. Details of this is set out in chronological order below.

2007 Masterplan -SKM

The land was identified as potential for future urban development and was first formally assessed in 2007. This report was completed by James Lunday from Common Ground, Boffa Miskell Limited and SKM. The framework report can be found at:

- [guildford-timber-company-framework-document-2007.pdf \(upperhuttcity.com\)](http://guildford-timber-company-framework-document-2007.pdf)

The development was feasible from an infrastructure planning perspective and the environmental effects, constraints assessment and infrastructure and serving work done to support that framework was comprehensive and extensive. It demonstrated that the SGA could meet the southern growth urban development needs for the district through providing for good, well designed housing around a series of village hubs which would in turn contribute to the economic vitality of Silverstream and potentially provide for recreational activity for the wider community once forestry operations ceased on the site. The 2007 plan is outlined in Figure 1 below:



Figure 1. 2007 Masterplan by SKM.

The work that was undertaken as part of that process included:

- Transport modelling
- Power
- Stormwater
- Waste water and water supply and other services
- Reverse sensitivity assessments
- Cost estimates to confirm feasibility
- Urban design
- RMA planning
- Ecology
- Consultation with the wider community and relevant stakeholders

Upper Hutt Urban Growth Strategy (2007)

The Guildford Growth Framework formed the basis of the Southern Growth Area for the Upper Hutt Urban Growth Strategy (2007). This was adopted by Upper Hutt City Council in 2007.

Upper Hutt Land Use Strategy (2016)

The Upper Hutt Land Use Strategy 2016 (“LUS”) followed on from the 2007 strategy, and identified a range of options for accommodating future urban growth, including intensification in and around the City Centre and Fergusson Drive, infill throughout the existing urban area, and four edge expansion areas (Figure 3). The largest edge expansion area was the SGA.

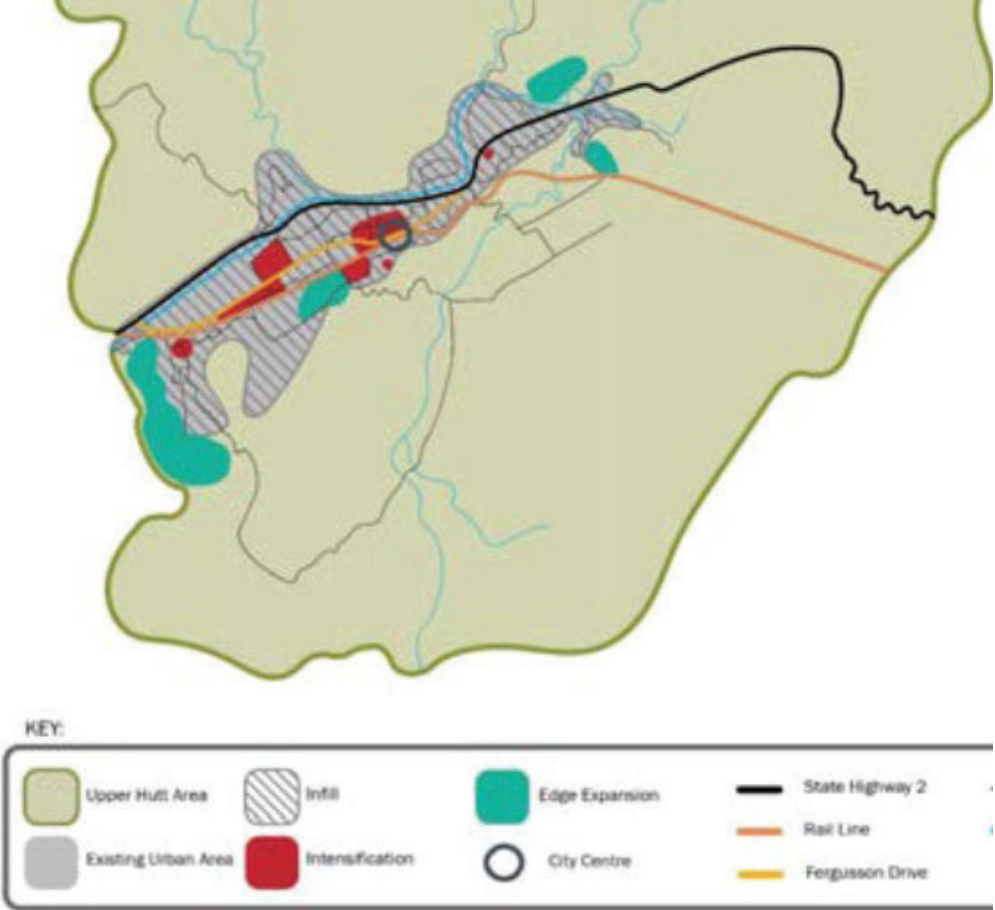


Figure 2. Urban Development Strategy map showing urban areas. Source: GWRC.

Identification of the edge expansion areas considered criteria including topography, environmental constraints, access, infrastructure, and landowner enthusiasm and capability. The SGA was identified as a location that “needs to be considered as a key strategic housing location for the next 30 years”,¹ and

¹ Page 80

the Strategy noted that a full assessment would be required to consider development issues, so while use of the SGA for residential activities was not considered imminent, its value in accommodating growth was recognised.

Wellington Regional Growth Framework (2021)

The SGA was also incorporated in the Wellington Regional Growth Framework 2021 (“WRGF”), as one of two future urban areas in Upper Hutt (along with the Gillespies Road Block, which was also included in the 2016 LUS.).

Reconfirming the Masterplan 2021-2022

Following on from the development of growth planning in the district and identification in the Regional Growth Strategy full concept masterplan was then undertaken to reconfirm the development, environmental and infrastructure assumptions for developing the Southern Growth Zone in 2022. The Full concept plan is provided in the attached hyperlink due to the size of the document. But the pages are reproduced in this submission.

<https://www.dropbox.com/t/cE2e8sD3MPaaoSCo>

This work was undertaken by Studio Pacific Architecture. Envelope Engineering also undertook at a concept level engineering work to confirm if the development is able to be implemented through private investment and that existing Council Infrastructure connections can be provided for water supply and waste water. UHCC long term planning was also able to take into account future growth planning as outlined below. The design of the Southern Growth Area as articulated through the Masterplan has been created using an urban design lead approach to create places, communities and interconnections into the Pinehaven and Silverstream communities. The principles of the masterplan are:

- Sustainability= conserving and respecting the natural environment and providing for resilient communities
- Innovation – being future focussed and thinking about energy supply, material use and water reuse
- Connection – having a strong sense of connection socially and through interaction provided by tracks, movement and interaction with the regenerating bush that can be planted post harvest
- Guardianship – being committed to caring for the land that’s been entrusted to us and will be handed over to new communities

As part these principles have been worked through GTC have been able to test and confirm that up to 1600 house hold units could be provided to help create those communities and contribute to the regions placemaking. This plan further demonstrated the connections, constraints and infrastructure/ services for the site.



Figure 3: excerpt from the concept masterplan illustrating primary village hubs.

Infrastructure Accelerator Fund 2021

The work that was completed for the masterplan and engineering was used as a joint application by UHCC and GTC to obtain IAF funding for infrastructure. To unlock the development potential of Silverstream Forest, access for a road and infrastructure corridor was required. In this application the road and infrastructure corridor would extend from Kiln St in Silverstream, over GTC's land at 44 Kiln St, and over the Spur to GTC land on the ridge where development would occur.

The IAF application sought a contribution from Government towards the cost of the road, infrastructure corridor, and water reservoir that would service at least the first stage of development at Silverstream Forest: approximately 400 houses. The Concept Masterplan by Studio Pacific Architecture was completed to inform this work and Envelope Engineering's concept design and cost estimation was completed for this application. This included detailed consideration of three waters, network utilities, stormwater and traffic infrastructure – for much of the site.

Development of the Pine haven Flood Management Plan and Plan Change 43

In parallel to the development of the growth strategies, the Southern Growth Area was also assessed and taken into account for the Pinehaven Flood Management Plan, using the spatial areas identified in the Guildford Development Framework 2007. Sensitivity scenarios of what would happen to the catchment if the development was no longer in forestry and a stormwater neutral development² was implemented as outlined through the growth strategies was completed. This FMP was then used as the basis of informing Plan Change 43 to the Upper Hutt District Plan and stormwater infrastructure improvements to Pinehaven. These stormwater improvements to address existing issues and future climate risk are currently being implemented.

Provision for supporting infrastructure for the SGA in UHCC Long term Plan 2022

In 2021 consistent with the pattern of Council lead planning for the SGA it was recognised as a future urban area in the UHCC Long Term Plan 2021- 2031 (page 118). This plan was adopted in 2022.

The SGA was identified in the long term plan in 2022 as a high growth area called the Southern Growth Zone, that was recognised and accounted for in the planning for public infrastructure upgrades for growth planning purposes. In particular it noted that it that would require a replacement Silverstream Bridge in years 4-10 and a new pine haven reservoir in years 11-20. (page 137) both of these investments were identified as requiring significant capital investment but have been planned for in the LTP to provide for Medium Term Growth.

² Note

Plan change 49-variation 1 – to enable roading network utilities and water tanks on the spur- currently being heard on 17th November.

Variation 1 was notified on 5 October 2022, with the submission period closing 4 November 2022. A key point for the Variation 1 is that the PC49 proposes to:

- “...Enable site-specific provisions for infrastructure, including a transport corridor.
- Provide access to the Silverstream Spur for a range of recreation, conservation and customary purposes, as well as potential future access to the Southern Growth Area (through the proposed site specific provisions).

The Variation 1 has advanced a change to PC49 recognising the value of providing for a future provision of access through the Spur land. Hearings are currently scheduled to further progress to a decision on this Plan Change but the provision of access provides further evidence of how integrated the long term planning for the site is and the provision of Southern Growth Area is consistent with the aims of the city..

UHCC Plan change 50 – Rural review -GTC will be seeking rezoning of SGA. Submission close 17 November, through that process GTC will seek to have that land rezoned residential via that proposed plan.

Conclusions on planning history for the SGA

This detailed history of the site, including Council lead planning processes and provision in the Long Term Plan, joint planning undertaken with Council and GTC and GTC own work including its own financial feasibility work demonstrates that development of the SGA are well connected and planning for the infrastructure for the SGA has been advanced by Council, over the last 17 years. As the remaining pine forest on the SGA matures and is harvested SGA is primed for re-development.

NPS-UD - definitions “plan- enabled” and “infrastructure ready”

The National Policy Statement for Urban Development in section 3.4 outlines that development needs to be plan enabled and infrastructure ready. This is outlined below:

*“Development capacity is **plan-enabled** for housing or for business land if:*

- (a) in relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan*
- (b) in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan*

- (c) *in relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification in an FDS or, if the local authority is not required to have an FDS, any other relevant plan or strategy.”*

GTC are of the view that the SGA (as demonstrated in detail above). Meets these criteria. GTC are currently seeking for the land to be rezoned via submission on Plan Change 50 (in advance of the Draft FDS hearing) inclusion in a proposed plan, and subsequent possible rezoning through that process means the site will be zoned for housing meets the criteria for ‘plan enabled’ in the medium term. It also meets the definition of plan enabled in the long term as outlined above the Southern Growth Area has been identified previously as being set aside for future urban use and via this submission should be included in the FDS.

In order to provide development capacity identified in the NPS UD, development capacity is **infrastructure-ready** if:

- (a) *“in relation to the short term, there is adequate existing development infrastructure to support the development of the land*
(b) *in relation to the medium term, either paragraph (a) applies, or funding for adequate development infrastructure to support development of the land is identified in a long-term plan*
(c) *in relation to the long term, either paragraph (b) applies, or the development infrastructure to support the development capacity is identified in the local authority’s infrastructure strategy (as required as part of its long-term plan).”*

In summary, the Southern Growth Area has been planned for most recently has had updated infrastructure assessments completed to confirm that infrastructure will be ready to enable the planned development in this growth through the Upper Hutt City Long Term Plan 2022. Plan Change 49 V1 has allowed for this infrastructure to be provided and Plan Change 50 will seek rezoning – this will be the third in a consecutive series of plan changes to make consider and make provision for development of SGA). GTC are of the view that that the SGA meets (a) in some aspects (b) and (c) in terms of the requirements for development capacity being medium term or long term “infrastructure ready.” There is no reason why the Draft FDS as sought to apply more restrictive lens than what is provided for in the NPS-UD.

FAILURE TO INCLUDE THE SGA IN THE FDS

Based on the history of the site and substantive planning undertaken there is no reasonable explanation for failing to identify the SGA in the Draft FDS. As no reasoning has been provided it is unclear why this site has been omitted. This goes against the intent behind GTC’s provision of wanting to provide for a step change in development aspirations that is consistent with the draft FDS design principles. The extensive history and planning confirms that it cannot only be serviced by infrastructure, but that Council has made significant steps to prepare for the development.

Assessment against the Draft FDS criteria

We have undertaken an assessment based on the information available to both GTC and UHCC against the Draft FDS criteria for Prioritised Development, which signals that the SGA is a good fit for inclusion and recognition in the FDS. The assessment below sets out each criteria in turn and provides a response for the SGA.

The Future Development Strategy vision:

Let's be responsible ancestors. The Wairarapa Wellington-Horowhenua Future Development Strategy will provide for growth that is sustainable by meeting the needs of the present without compromising the ability of future generations to meet their own needs. The future for our region is founded on Te Tiriti o Waitangi and realised through the tino rangatiratanga of tangata whenua.

A Mātou Tirohanga

Guildford Timber Company's vision for the forest and growth area is to create a residential development where people are able to live closer to nature within an urban setting. The proposed forest edge and potential recreation connection not only defines the future greenfield growth but connects the existing Pinehaven and Silverstream communities to the forest and provides for further green corridors. Development is able to be integrated into the forest ridgeline and the steeper slopes will be retained in forest.

The strategic direction:

The strategic direction for this Future Development Strategy comprises:

- **providing for affordable housing that meets our needs, and for compact well-designed towns and cities**
- **realising iwi and hapū values and aspirations**
- **promoting a flourishing zero-emissions region**
- **protecting what we love**
- **ensuring we have the infrastructure we need to thrive**
- **providing opportunity for productive and sustainable local employment.**

The Masterplan demonstrates that within the 330 hectares of land that compact urban development can be provided at scale that will meet a range of housing needs, including housing affordability. This is driven by providing walkable villages with compact and well designed housing and community spaces. Figure 4 provides an example of how one of the hubs could be designed. Further detail is provided in the concept masterplan.



Figure 4. Example of one of the village nodes in Silverstream Forest.

We will prioritise well designed, well-functioning urban environments in the region's towns and cities in this order:

- a. Areas of importance to iwi for development.**
- b. Areas along strategic public transport network corridors with good access to employment, education and 'active mode connections' such as walking, cycling, scootering and skateboarding.**
- c. Priority Development Areas**
- d. Within existing rural towns around current and proposed public transport nodes and strategic active mode connections.**
- e. Greenfield developments that are well connected to existing urban areas in our towns and cities and can be easily serviced by existing and currently planned infrastructure, including by public and active transport modes, and where the location and design would maximise climate and natural hazard resilience.**

The Future Development Strategy does not support development that does not meet these priorities.

Our assessment of the prioritisation criteria is below:

Priority A -GTC has reached and is willing to work with iwi to provide for development that meets their housing needs and provide for kaitiakitanga for caring for the land through ecological restoration

Priority B - The Southern Grown Zone is well located for public transport through planned feeder connections to Silverstream Railway Station. The site has good access to regional employment on the train line and new employment hubs being developed within Upper Hutt. Schools are well situated to the site in Pinehaven and Silverstream. Active mode connection can be provided for along the spine road and additional walking and cycling recreational trails for the whole community can be incorporated into the development.

As outlined below the infrastructure required to enable the development is possible and the introduction of new housing into the area will be able to strengthen employment in the Silverstream town centre and provide for housing needs for people who desire to come to Upper Hutt seeking affordable housing options but not live within an apartment setting. The site will also be highly connected with sustainable transport options available for development. This is further illustrated through figures 5-7 below.

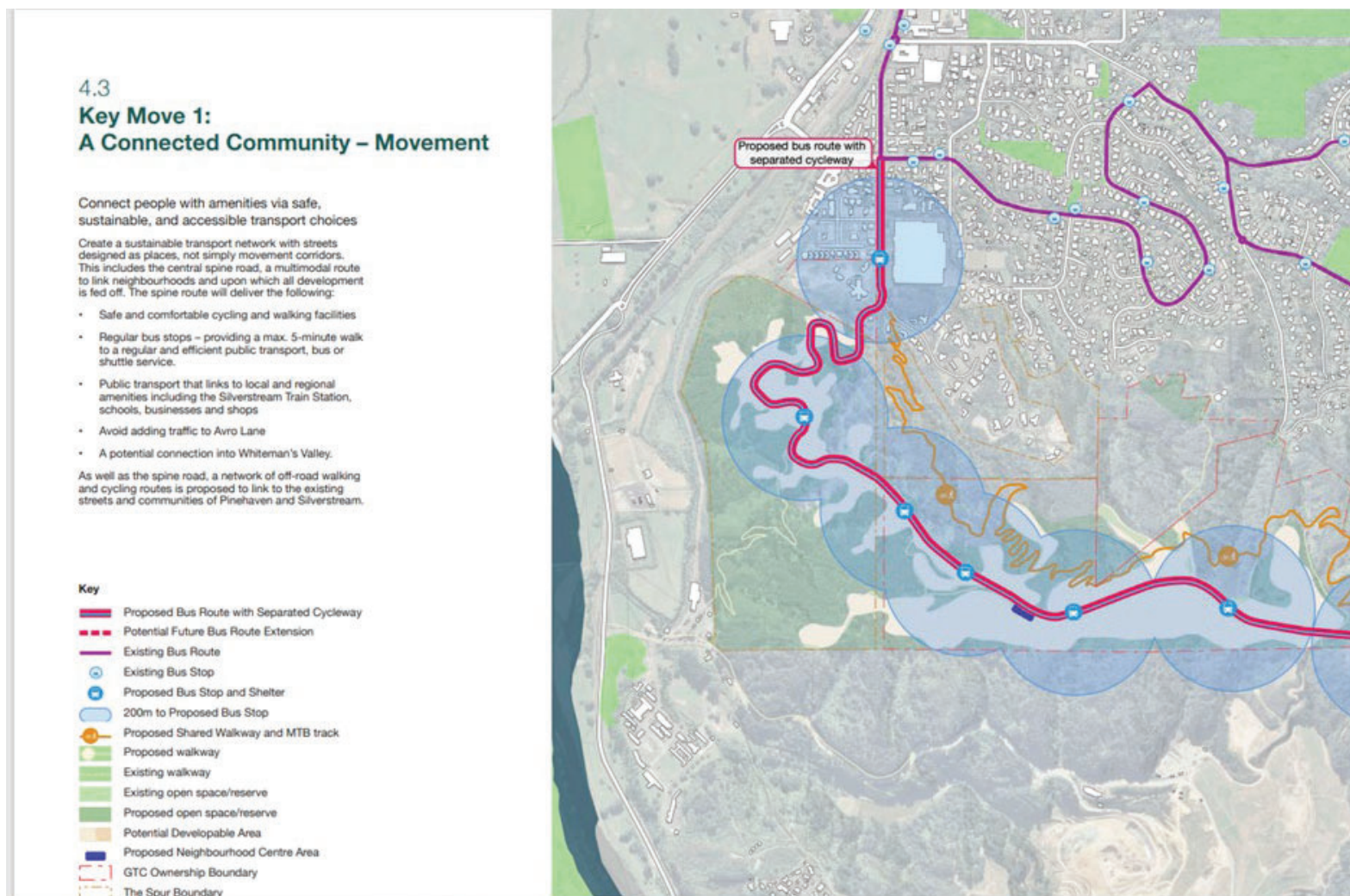


Figure 5. Public Transport connections to Silverstream Village.

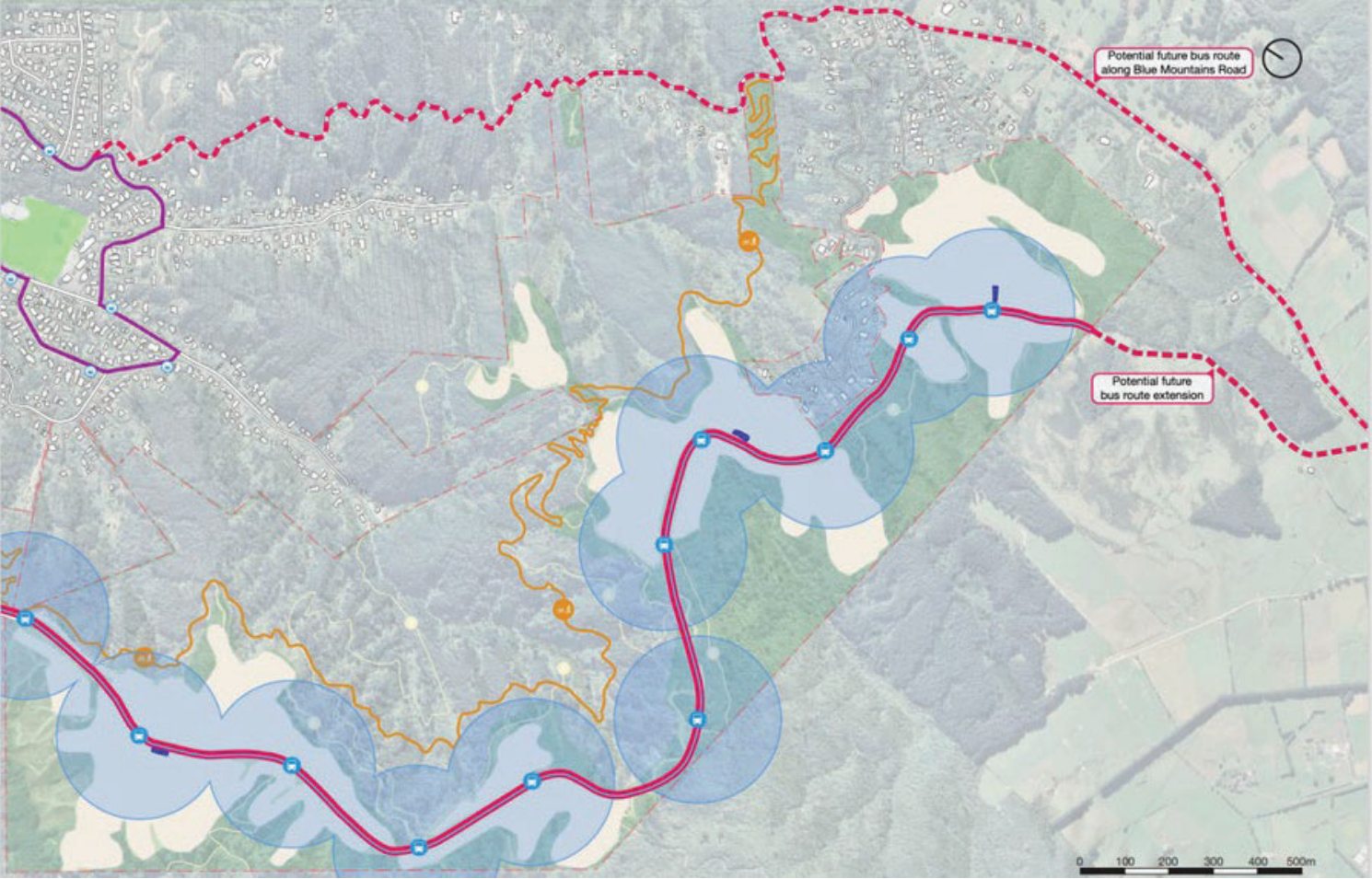


Figure 6. Public Transport connections and extension of the network

3.2
Existing Amenities and Access

The site is located in close proximity to existing amenities in Pinehaven and Silverstream. These include the Silverstream Railway Station, Silverstream New World supermarket, Pinehaven (primary) School, local bus routes and State Highway 2 linking the area to the rest of the Hutt Valley and the greater Wellington region.

Kiln Street is the closest potential road link to the site from Silverstream and Pinehaven. Other access points exist off some Pinehaven streets, but these are all walking and cycling links given the steep terrain. Blue Mountain Road and Avro Road take you up to the eastern/back end of the site. However, these are narrow, winding roads with limited capacity.

- Key**
- Parks and Reserves
 - Primary Education
 - Secondary Education
 - Early Childhood Education
 - Community Facilities/Churches
 - Services (Supermarkets, Dairys, Petrol Stations)
 - Restaurants, Bakeries, Cafes
 - Silverstream Train Station
 - GTC Ownership Boundary

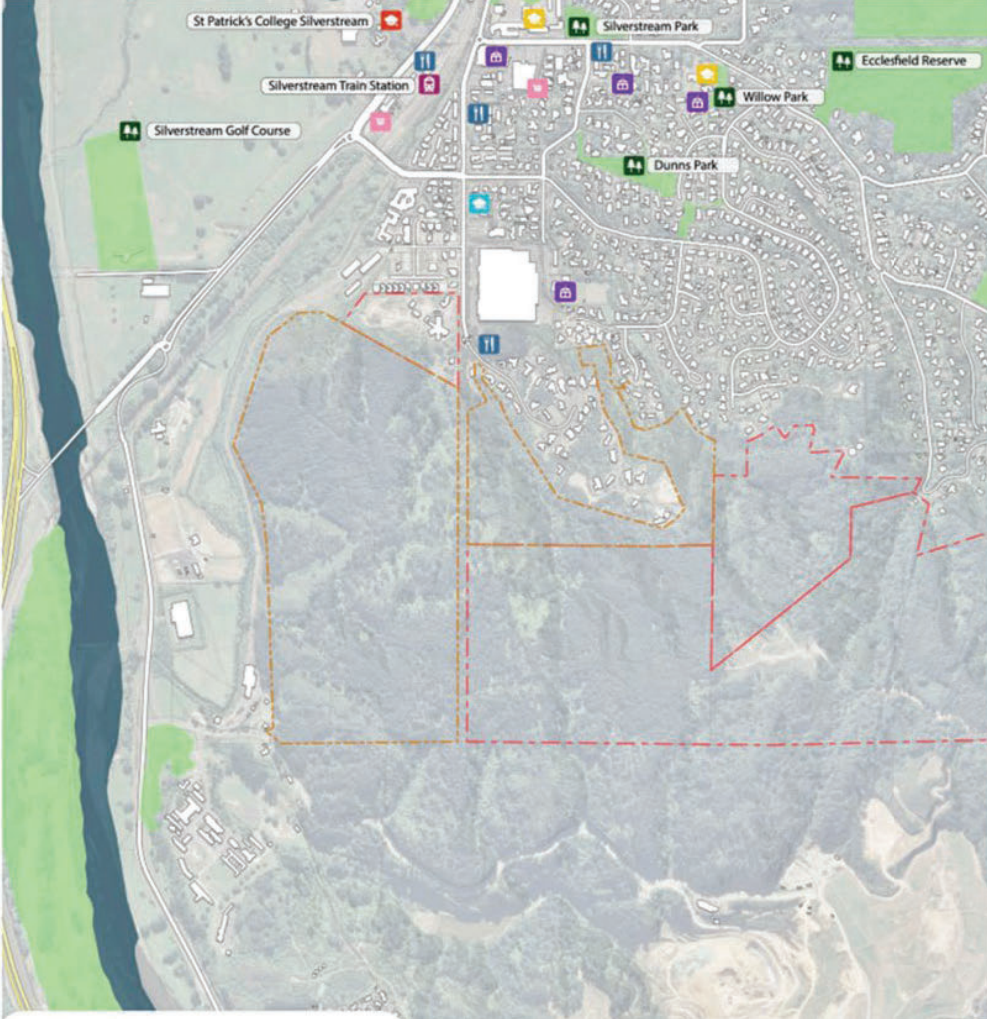


Figure 7. Transport connections to access and amenities for the Southern Growth Area.

Priority C - The type of greenfield housing will also be distinctly different from other greenfield areas in Upper Hutt providing for further housing choice, and affordable housing as illustrated through Figure 8 and the Concept Masterplan in Appendix B.

5.2.1

Focus Area 2 – Hub

Our Key Move 4 Vibrant Communities focuses on enabling attractive community hubs that provide opportunities for learning, sharing, and growing local economies. Being at the heart of the development, with a significant area of developable land, we see the hub in the central zone as being the main village centre.

Potential elements here include a flexible community hub space, café, mini-market or corner shop, live-work units, makers studios, potential businesses related to the reserve (e.g. cycle tours) an early learning centre, open spaces, vegetation, potential workspace and maybe a farmers market. Bus shelters here with a regular bus/shuttle service are needed to link residents to the train station, need for regular trips, getting to work and school etc. and avoid over-reliance on private vehicles.



Figure 8. Connections through village hubs fostering community and access.

Flexible Community Hub Space, could include play facility and breakout spaces for markets and community events.

Potential Cafe Spaces below, parking accessed from Lane behind, taking advantage of landform changes

In lane bus or shuttle services along Spine Road

Mini-market or corner shop opportunity with live and work units above

Potential makers studios or community spaces

Rear access through lots provide routes other than roads to move around Silverstream Forest

Priority D - The development of Silverstream Forest will also strengthen and provide for active and passive recreation for new residents that would move into the planned upzoning of existing urban areas. See Figure 9. Currently there is a lack of formal recreation assets within the Pinehaven and Silverstream urban areas and the retirement of former forestry blocks will strengthen the ability for communities to flourish in existing urban areas.

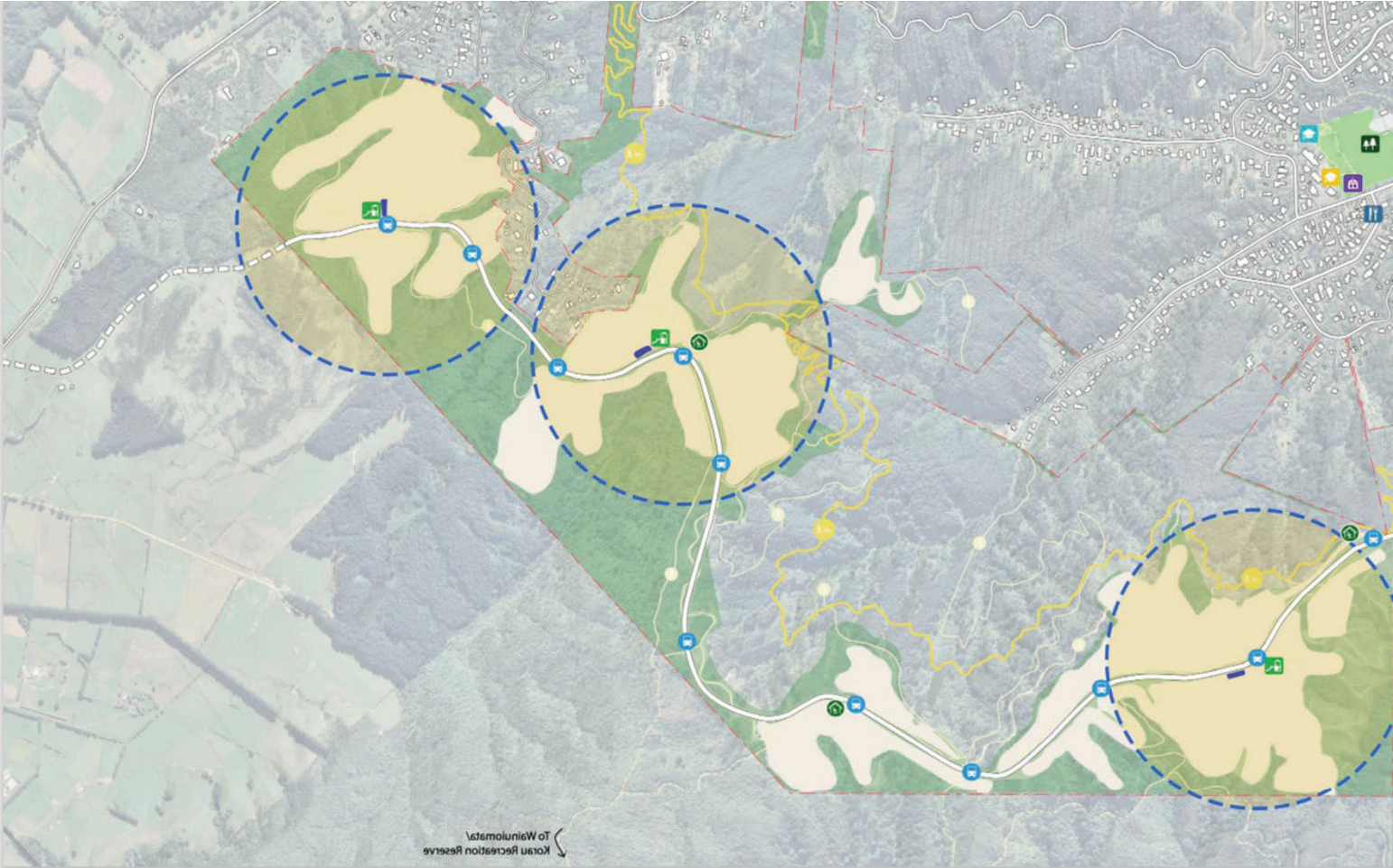


Figure 9. Map showing recreational connections for village hubs and connections to the Pinehaven and Silverstream communities.

The site is also not identified as highly productive land and as a result would not result in the permanent loss of productive soils.

Overall the Southern Growth Zone provides for a compact and well designed development form that is well connected by Public Transport and will be able to meet good urban design outcomes. These outcomes will be balancing the ecological, social and economic factors that is required from a development to provide for housing where a community wants to grow and connect with each other and the with the natural environment.

In addition to the existing planning already undertaken and design outcomes that can be provided, as outlined below, by not including the Southern Growth Zone in the Future Development Strategy this may also create additional risk to achieving good urban form outcomes for providing for housing in the district over the next 30 years.

Priority E - As outlined above, through the two masterplans to further define the form and function of the development of the site and infrastructure planning completed by GTC and Upper Hutt City Council the development can be appropriately serviced. Active and public transport modes are provided for and the site planning allows for increased natural hazard resilience from retirement of pine plantation forestry if the site is able to recognised as a priority greenfield area.

Relief requested:

For the reasons set out above the GTC seek inclusion and recognition of the SGA in the Draft FDS as a priority Greenfield Area.