

NZ Transport Agency Waka Kotahi Reference: 2024-0058

27 January 2026

Greater Wellington Regional Council
C/- Alisha Vivian – Senior Policy Advisor
100 Cuba Street, Te Aro
Wellington 6011

Via email: Alisha.Vivian@gw.govt.nz, regionalplan@gw.govt.nz

Dear Alisha,

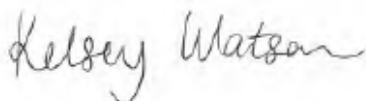
Submission on Variation 1 to Proposed Change 1 to the Natural Resources Plan for the Greater Wellington Region

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on Variation 1 to Proposed Change 1 to the Natural Resources Plan.

We would welcome the opportunity to discuss the contents of our submission with yourself, or other relevant council staff as required. NZTA wishes to be heard in support of its submission if a hearing is required.

If you have any questions, please contact me.

Yours sincerely



Kelsey Watson
Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: 0272942337

Email: Kelsey.watson@nzta.govt.nz
environmentalplanning@nzta.govt.nz

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

1. This is a submission on the following:

Proposed Change 1 to the Natural Resources Plan for the Greater Wellington Region

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

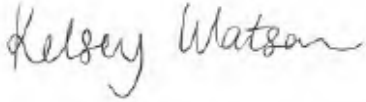
3. The specific provisions of the proposal that this submission relates to are:

- Development contributions
- Hydrological controls for stormwater

4. The submission of NZTA is:

- (i) NZTA supports the variation to proposed change 1 to the extent outlined below.
- (ii) NZTA supports delaying the date by which financial contributions are required to be paid until 31 December 2027. However, NZTA considers that the relief provided should go further in that financial contributions should not be included as conditions of consent that are required to be retrospectively paid until such time as decisions are made via the PC1 hearings process. Given the pause to PC1 proceedings, there is current uncertainty as to what the Financial Contributions will look like following recommencement and the subsequent conclusion of hearings. It is considered inappropriate to impose a condition of consent which will require a development contribution to retrospectively be paid given this uncertainty. NZTA invests significant funding in stormwater treatment as part of transport projects, and the immediate or deferred imposition of financial contributions would impose unnecessary costs and potentially make some transport projects unviable. NZTA has previously submitted that an exclusion should be provided under Schedule 30 for financial contributions for state highways and retains this position.
- (iii) NZTA support deferring the requirement for sites smaller than 1000m² to provide “hydrological control” until the date of decision on PC1. This will ensure that if all other conditions of the rule are able to be met, sites smaller than 1000m² are not required to undergo a consenting process. This addresses instances where providing for hydrological control may be impracticable or impossible due to the size and nature of the development.
- (iv) NZTA remains concerned around the scale of changes proposed in Plan Change 1, particularly as it relates to the scale of changes proposed and timeframes to implement them. NZTA would like to see Variation 1 to Plan Change 1 widened to remove the immediate legal effect of all introduced provisions until such time as the hearings are concluded and decisions issued on Plan Change 1. Whilst Plan Change 1 is paused, there is significant uncertainty for plan users given the immediate legal effect of these provisions. For infrastructure providers like NZTA this represents a set of costly and onerous requirements which may inhibit the delivery of future projects whilst the provisions of Plan Change 1 are being resolved. NZTA would support Variation 1 to Plan Change 1 being widened to remove the immediate legal effect of these provisions.

Signature:



Senior Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 27 January 2026

Address for service: NZ Transport Agency Waka Kotahi
44 Bowen Street
Wellington 6011

Contact Person: Kelsey Watson
Telephone Number: 0272942337
Alternate Email: EnvironmentalPlanning@nzta.govt.nz