

## Form 5

### Submission on notified proposal for plan change

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Greater Wellington Regional Council

**Name of submitters:** R P Mansell; A J Mansell, & M R Mansell

This is a submission on the following plan change proposed to the Operative Regional Policy Statement for the Wellington Region (the **proposal**):

- Proposed Plan Change 1 (PPC1)

The submitters could not gain an advantage in trade competition through this submission.

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

- New resource management issue for the Wellington Region relating to housing and infrastructure
- Introduction to Chapter 3.9
- Objective 22
- Objective 22B
- Policy 55
- Policy 56

We seek the following decision from the regional authority:

Refer to submission attached.

We wish to be heard in support of our submission.



Signature of submitters  
(or person authorised to sign  
on behalf of submitters)

Date: 14 October 2022

Electronic address for service of submitters: [chris@rmaexpert.co.nz](mailto:chris@rmaexpert.co.nz)

Telephone: 021 026 45108

Contact person: Chris Hansen, RMA Planning Consultant

## **Submission on notified Proposed Plan Change 1 (PPC1)**

### **Overview**

The following submission is on behalf of R P, A J and M R Mansell (the submitters) who own property in Otaihanga, Paraparaumu. The submitters have applied for subdivision (including earthworks and infrastructure) resource consent from the Kāpiti Coast District Council for part of their property severed by the Kāpiti Expressway.

### National Policy Statement – Urban Development (NPS-UD)

A key Objective of the NPS-UD is to ensure New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. The NPS-UD has directives for regional policy statements/plans and district plans to achieve this objective. PPC1 to the RPS for the Wellington Region intends to implement and support the NPS-UD by introducing (amongst other things) a new overarching resource management issue specific to urban development; new overarching objectives, and amendments to key policies.

### Te Tupu Pai – District Growth Strategy

The submitter's property is identified in the Kāpiti Coast District Council's Te Tupu Pai district growth strategy as a medium-priority future greenfields development area. Te Tupu Pai identifies the main elements of growth, and the emphasis of "*opening up some greenfields progressively over time, with our greenfield development also being denser and more connected into public transport*" (page 8 of Te Tupu Pai). The delivery approach includes how Council will work with (amongst others) developers and making sure the right infrastructure is available at the right time for achieving sustainable growth for Kāpiti. There is a clear direction in Te Tupu Pai that future growth in Kāpiti will be met through intensification of existing areas, and new greenfield developments. Te Tupu Pai is not a Future Development Strategy in terms of the NPS-UD.

The above context is important to understand the submission points being made below to PPC1.

### **Submission Points**

The submitters makes the following submission points on PPC1:

#### ***Submission Point #1 – New resource management issue for the Wellington Region relating to housing and infrastructure***

The submitters support the introduction of the *new overarching resource management Issue 2* into Chapter 3 of the RPS that recognises increasing pressure on housing and infrastructure

capacity in the Wellington Region. This issue is considered to be consistent with the intent and requirements of the NPS-UD.

#### Decision Sought

The submitters seek the intent of the new overarching resource management Issue 2 to be retained as currently written.

#### ***Submission Point #2 – Introduction to Chapter 3.9: Regional form, design and function***

The submitters note a number of amendments are proposed to the Introduction to Chapter 3.9 to recognise well-functioning urban environments, and reference to the Western Growth Corridor – Tawa to Levin (included in the Wellington Regional Growth Framework). The submitters generally support that amendments proposed to the introduction to Chapter 3.9 and consider they are consistent with the intent and requirements of the NPS-UD.

#### Decision Sought

The submitters seek the intent of the amendments to the introduction to Chapter 3.9 to be retained as currently written.

#### ***Submission Point #3 – Objective 22***

The submitters note Objective 22 is proposed to be re-written to enable urban development where it demonstrates the characteristics and qualities of well-functioning urban environments, which are defined in clauses (a) to (k) in the amended objective. Objective 22 is to be implemented through a number of policies, including Policy 55 (Providing for appropriate urban expansion).

The submitters generally support that amendments proposed to Objective 22 and the implementation of the objective through Policy 55, and consider they are consistent with the intent and requirements of the NPS-UD.

#### Decision Sought

The submitters seek the intent of the amendments to Objective 22 and implementation through Policy 55 to be retained as currently written.

#### ***Submission Point #4 – Objective 22B***

The submitters note the proposed new Objective 22B that reads:

*“Development in the Wellington Region’s rural area is strategically planned and impacts on significant values and features identified in this RPS are managed effectively.”*

Objective 22B is to be implemented through Policy FW.7 (Water attenuation and retention - non-regulatory) and Policy 56 (Managing development in rural areas – consideration).

The submitters generally support the proposed new Objective 22B and the implementation of this objective through Policy 56, and consider they are consistent with the intent and requirements of the NPS-UD.

#### Decision Sought

The submitters seek the intent of the proposed new Objective 22B and the implementation of this objective through Policy 56 to be retained as currently written.

#### ***Submission Point #7 – Policy 55: Providing for appropriate urban expansion - consideration***

The submitters note the following amendments are proposed to Policy 55:

- The policy is renamed to: “*Providing for appropriate urban expansion*”;
- Changing the region’s urban areas to be as at August 2022;
- Amending Clause (a) by requiring urban development to contribute to establishing or maintaining the qualities of a well-functioning urban environment, and listing the qualities in sub-clause (i) and (ii);
- Amending Clause (b) to require urban development consistent with any Future Development Strategy, or the regional or local strategic growth strategy and/or development framework should the Future Development Strategy be yet to be released;
- Adding a new Clause (d) providing for any urban development that would provide significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies.

The Explanation to Policy 55 is also amended to give guidance to how the policy is to be interpreted, including the intent of Clause (b) to provide an interim period where the Future Development Strategy is in development.

The submitter’s note in the explanation referring to Clause (b) that the intent is also to give consideration to the regional strategic growth and/or development framework. However, the actual wording of the proposed Clause (b) refers also to giving consideration to a local strategy and/or development framework, and the submitters would seek an amendment to the Explanation to accurately reflect the proposed new wording of Clause (b).

The submitters generally support the proposed amendments to Policy 55 and the proposed new Explanation, subject to an amendment to the reference to local strategies and/or development frameworks in the second paragraph of Clause (b) (as outlined above), and consider the amendments are consistent with the intent and requirements of the NPS-UD.

#### Decision Sought

The submitters seek the intent of the proposed amendments to Policy 55 and Explanation be retained as currently written, with an exception being an amendment to the second sentence in paragraph two of the Explanation to read (words sought to be added (or similar) are underlined):

*“To provide for the interim period where the Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth framework, or any local strategic growth and/or development framework or strategy that describes where or how future urban development should occur in a District.”*

***Submission Point #8 – Policy 56 – Managing development in rural areas - consideration***

The submitters note amendments to Clause (d) to provide for the interim period where the Future Development Strategy is in development, similar to Policy 55 above. The Explanation to Policy 56 is also proposed to be amended by deleting the previous wording and adding a new paragraph that recognises the tension that exists between urban and rural development on the fringe of urban areas.

The submitters generally support the amendments proposed to Policy 56 and the Explanation.

**Decision Sought**

The submitters seek intent of the proposed amendments to Policy 56 and the Explanation to be retained as currently written.