

Submission on notified proposal for plan change



About preparing a submission on a proposed plan change

You must use the prescribed form

- [Clause 6](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires submissions to be on the prescribed form.
- The prescribed form is set out in [Form 5](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 5. While you do not have to use this template, your submission must be in accordance with Form 5.

Your submission and contact details will be made publicly available

- In accordance with [clause 7](#) of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under [clause 8A](#) of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).
- [Section 352](#) of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.

Reasons why a submission may be struck out

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

To Kāpiti Coast District Council

Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021

Submitter details

Full name of submitter: Greater Wellington Regional Council

Contact person (name and designation, if applicable): Mika Zollner

Postal address (or alternative method of service under section 352 of the RMA):

100 Cuba St, Te Aro, Te Whanganui-a-Tara 6011

Telephone: 0212267336

Electronic address for service of submitter (i.e. email): Mika.Zollner@gw.govt.nz

I would like my address for service to be my email *[select box if applicable]*



I have selected email as my address for service, and I would also like my postal address withheld from being publicly available *[select box if applicable]*



Scope of submission

The specific provisions of the proposed plan change that my submission relates to are:
[give details]

See Attachment 1 and Attachment 2.

Continue on a separate sheet if necessary

Submission

My submission is: *[include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]*

See Attachment 1 and Attachment 2.

Continue on a separate sheet if necessary

I seek the following decision from the Kāpiti Coast District Council: *[give precise details]*

See Attachment 1 and Attachment 2.

Continue on a separate sheet if necessary

Hearing Submissions [select appropriate box]

I wish to be heard in support of my submission.	<input checked="" type="checkbox"/>
I do not wish to be heard in support of my submission.	<input type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input checked="" type="checkbox"/>
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	<input type="checkbox"/>

15/09/2022

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

A signature is not required if you make your submission by electronic means.

Trade Competition [select the appropriate wording]

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / I could not ☒ gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission, please complete the following:

I am ☐ / I am not ☐ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Email your submission to district.planning@kapiticoast.govt.nz or post/deliver to:

Attn: District Planning Team
Kāpiti Coast District Council
175 Rimu Road
Paraparaumu 5032

For office use only

Submission No:

97



Attachment 1: Greater Wellington Regional Council Submission

To:	Kāpiti Coast District Council
Submission on:	Proposed Plan Change 2 to the Operative District Plan

REASON FOR SUBMISSION

1. The Greater Wellington Regional Council (**Greater Wellington**) wishes to make a submission on Proposed Plan Change 2 (**the Plan Change**) to the Kāpiti Coast Operative District Plan pursuant to Schedule 1 clause 6 of the Resource Management Act 1991 (**the Act**). This submission is from Greater Wellington officers.
2. Greater Wellington supports in part the Plan Change, and seeks some amendments. Of particular interest is ensuring consistency with the Regional Policy Statement for the Wellington Region (**RPS**) and Proposed RPS Change 1, which was notified on 19 August 2022.
3. The general and specific reasons for Greater Wellington's relief are set out in this submission and responses to specific provisions are included in Attachment 2, to be read alongside this submission. Greater Wellington could not gain an advantage in trade competition through this submission.

SCOPE TO GIVE EFFECT TO THE RPS AND HAVE REGARD TO PROPOSED RPS CHANGE 1

4. We understand that the Plan Change is an Intensification Planning Instrument (**IPI**) and Kāpiti Coast District Council (**KCDC**) is required to use the Intensification Streamlined Planning Process to give effect to Policies 3 and 4 of the NPS-UD and implement the Medium Density Residential Standards (**MDRS**). The focus and therefore scope of the IPI is constrained to those matters.
5. Attachment 2 contains detailed comments on the IPI, including specific direction from both the operative RPS and Proposed RPS Change 1. The IPI must give effect to the operative RPS and have regard to Proposed RPS Change 1. In many instances, the IPI or Operative District Plan is already consistent with Proposed RPS Change 1. Greater Wellington's submission seeks alignment with the direction and intent of regulatory policies that apply to district plans where necessary.
6. Greater Wellington considers there is sufficient scope to amend or introduce provisions as is necessary to manage the levels of intensification being enabled by the IPI.
7. Section 80E of the Act provides for an IPI to amend or include:
 - Provisions relating to financial contributions
 - Provisions to enable papakāinga housing in the district
 - Related provisions, including objectives, policies, rules, standards, and zones that support, or are consequential on the MDRS or policies 3,4 and 5 of the NPS-UD.

8. Section 80E(2) describes related provisions to include (without limitation):
- District-wide matters
 - Earthworks
 - Fencing
 - Infrastructure
 - Qualifying matters identified in accordance with sections 77I or 77O
 - Stormwater management (including permeability and hydraulic neutrality)
 - Subdivision of land.
9. Some relief sought by Greater Wellington is as “related provisions” that are generally considered consequential to the proposals for intensification, in order to manage the subsequent potential effects. This is consistent with the Environment Select Committee’s advice on the RMA Enabling Housing Supply and Other Matters Amendment Act to enable adjustments to other parts of the District Plan in an Intensification Streamlined Planning Process to manage issues and support the implementation of the MDRS. Greater Wellington considers there is therefore sufficient scope to amend or introduce the provisions as requested. The related provision relevant to each submission point is identified in Attachment 2.
10. In some instances, Greater Wellington seeks relief for new or amended provisions as qualifying matters to restrict the required density or MDRS. Where this is requested, the qualifying matter has been described and how it meets the requirements of section 77I or 77O.

POLICY FRAMEWORK

Regional Policy Statement for the Wellington Region

11. The RPS is a regional document that identifies significant resource management issues within the region and sets out the objectives, policies and methods to achieve integrated management of natural and physical resources for the Wellington region. The RPS was made operative on 24 April 2013.
12. District plans must give effect to the operative RPS. The RPS contains four types of policies: regulatory policies must be given effect to when making changes to district and regional plans (in accordance with section 75 of the Act). Consideration policies are to be considered when deciding on resource consents, notice of requirements, or a change, variation or replacement to a plan. Some of the consideration policies cease to have effect once the regulatory policies are given effect to through district or regional plans.

Proposed Change 1 to the Regional Policy Statement for the Wellington Region

13. Proposed RPS Change 1 addresses four significant and urgent resource management issues for the region:
- the impacts of climate change
 - loss and degradation of indigenous biodiversity

- degradation of freshwater
 - lack of urban development capacity.
14. Proposed RPS Change 1 provides new direction to district plans across several areas, to ensure that urban intensification occurring across the region is not at the expense of indigenous biodiversity, freshwater, coastal environments, the region's transition to being low-emission and climate resilient, and the ability for Māori to express their cultural and traditional norms.
 15. The NPS-FM requires Te Mana o te Wai to be articulated and long-term visions for freshwater in the region to be embedded in the RPS. Freshwater visions for each whaitua are being developed and will be added in future changes or through submissions. Statements of Te Mana o Te Wai expressions for Rangitāne o Wairarapa and Kahungunu ki Wairarapa are included in Proposed RPS Change 1. Our four other mana whenua / tangata whenua partners are developing expressions of Te Mana o Te Wai, which are intended to be added in future changes or submissions.
 16. KCDC must have regard to Proposed RPS Change 1 when preparing or changing a District Plan under section 74(2)(a) of the Act.

Proposed Natural Resources Plan

17. The Proposed Natural Resources Plan includes objectives, policies, methods and rules to manage the natural resources of fresh water, air, soil, and the coastal marine area. The Natural Resources Plan establishes rules for activities that discharge contaminants into water or to land where the contaminant might enter water, such as wastewater and stormwater discharges. It also restricts certain uses of land within natural wetlands and beds of lakes and rivers, such as structures, vegetation clearance and earthworks.
18. Under section 74(2)(a) of the Act, KCDC must have regard to the Natural Resources Plan for any matter of regional significance or for which the regional council has primary responsibility under Part 4 of the Act. By the time decisions are made on the IPI, the regional plan is likely to be operative, at which point the IPI must not be inconsistent with the Natural Resources Plan for any matter specified in section 30(1) of the Act.

The Wellington Regional Growth Framework

19. The Wellington Regional Growth Framework is a non-statutory document that describes a long-term vision for how the region will grow, change and respond to key urban development challenges and opportunities in a way that gets the best outcomes and maximises the benefits across the region. The current priorities are housing supply, affordability and choice; transport choice and access; Iwi/Māori housing, capacity and taonga; and climate change and resilience.

URBAN INTENSIFICATION TO CONTRIBUTE TO WELL-FUNCTIONING URBAN ENVIRONMENTS

20. Greater Wellington supports well-planned urban intensification which contributes to the qualities and characteristics of well-functioning urban environments. Intensification should occur in appropriate areas that are not subject to qualifying matters to ensure that intensification does not occur at the expense of the natural environment.
21. Growth within the existing urban footprint aligns with both operative and proposed RPS direction. Development located in and around centres and along public transport corridors supports a reduced need to travel by private motor vehicle and enhanced access to public transport, walking and cycling for more trips. This approach will contribute to reduced carbon emissions, mode shift and liveability outcomes. We support KCDC providing for intensification through implementation of the National Policy Statement for Urban Development and Housing Amendment Act.
22. Greater Wellington acknowledges the need for greenfield development, despite the significant increase in capacity provided for through the IPI. However, we want the IPI to ensure that any greenfield development proposed has sought to minimise the adverse effects of land use change.

RELIEF SOUGHT

23. Greater Wellington seeks the following decisions from KCDC:

- amendments to the IPI as sought in this submission;
- the relief as set out in Attachment 2;
- any other similar relief that would deal with Greater Wellington's concerns set out in this submission; and
- any consequential amendments necessary to the IPI arising from this submission.

FURTHER INVOLVEMENT

24. Greater Wellington wishes to be heard in support of its submission. We would also welcome the opportunity to clarify and further discuss the matters raised.

Yours sincerely



Matt Hickman
Manager, Environmental Policy

Address for service:

Mika Zollner

T 021 226 7336

E Mika.Zollner@gw.govt.nz

Attachment 2: Specific comments on Submission on Proposed Plan Change 2 to the Operative Kāpiti Coast District Plan

Note that these points are in addition to those made in Attachment 1 and both documents should be read together.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
Whole Plan Change	Intensification objectives and policies	Support	Greater Wellington supports the proposed amendments to give effect to the NPS-UD, specifically to enable a range of building heights and densities within the metropolitan centre zone and the walkable catchment of that zone and train stations at Paekākāriiri, Paraparaumu and Waikanae.	Retain as notified.
Whole Plan Change	Freshwater/Te Mana o Te Wai	Support with amendment	<p>Proposed RPS Change 1 seeks to begin to give effect to the NPS-FM by addressing the degradation of freshwater. The objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and ecosystems as a first priority, the health needs of people as a second priority; and the ability of people and communities to provide for their social, economic and cultural well-being as a third priority.</p> <p>Section 3.5 of the NPS-FM requires territorial authorities to include objectives, policies and methods in their district plans to promote positive effects and avoid, remedy or mitigate adverse effects of urban development on the health and well-being of freshwater bodies, freshwater ecosystems and receiving environments.</p> <p>Proposed RPS Change 1 (Policies FW.3 and 15 in particular) requires district plans to include provisions to manage the effects of urban development on freshwater and the coastal marine area, specifically requiring actions, including but not limited to:</p> <ul style="list-style-type: none"> • Adopting an integrated approach (ki uta ki tai) that recognises the interconnectedness of the whole environment to determine the location and form of development. • Consider the effects on freshwater and the coastal marine area of subdivision, use and development of land. • Consider the use and development of land in relation to target attribute states and any limits set in a regional plan. • Require that urban development is located and designed to protect freshwater bodies. <p>Any urban development may have direct impacts on freshwater bodies through potential effects such as increased stormwater runoff affecting both water quality and quantity, increased demand for potable and non-potable water supplies, or development adjacent to freshwater bodies affecting the form and function of those waterbodies and ecosystems. For these reasons, it is considered that having regard to PC2 with Proposed RPS Change 1 and giving effect to the NPS-FM is a related provision under Section 80E of the Act, which can be considered in this process.</p> <p>Greater Wellington supports the operative district plan's existing provisions that are consistent with Proposed RPS Change 1, including those that:</p> <ul style="list-style-type: none"> • Seek to avoid or mitigate offsite erosion and sediment losses • Avoid, remedy or mitigate effects on natural systems and • Require water use efficiency and non-potable alternative water sources. <p>However, we seek additional amendments to strengthen existing provisions or new provisions to have regard to Proposed RPS Change 1, specifically to provide for the health and well-being of waterbodies while enabling urban intensification.</p> <p>Amendments may be required across the plan to address the relief requested and it is considered scope is available to do this through this ISPP. This is because related provisions in an IPI can relate to district wide matters which include strategic direction, infrastructure, natural</p>	<p>Amendments are required to PC2 to have regard to Proposed RPS Change 1 and give effect to the operative RPS and NPS-FM. This includes, but is not limited to provisions that:</p> <ul style="list-style-type: none"> • Promote positive effects and avoid, remedy or mitigate adverse effects of urban development on freshwater. • Recognise and integrate Te Mana o Te Wai through the plan. • Require an integrated, holistic approach that recognises the interconnectedness of land, freshwater and the coast (ki uta ki tai). • Recognise and protect Māori freshwater values and relationship to sites of significance. • Require subdivision, use and development to be managed in a manner that avoids, remedies or mitigates effects on rivers, lakes, wetlands, springs and riparian margins. • Include consideration of the off-site effects of earthworks and land development, including on form and function of waterbodies. • Provide for protection and enhancement of water bodies and freshwater ecosystems, including wetlands, during structure planning and sub-division, such that water bodies must be identified and protected prior to any development occurring. <p>It is considered amendments would likely be required across the plan, but particularly the following chapters:</p> <ul style="list-style-type: none"> • Strategic direction. • Urban form and development. • Energy, infrastructure and transport. • Subdivision. • All zones.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			environment values, subdivision and earthworks in accordance 80E(2)(a) and stormwater management in accordance with section 80E(2)(f).	
Whole Plan Change	Stormwater Quality	Support with amendment	<p>Stormwater management is a significant factor that contributes towards the health and well-being of freshwater and coastal environments. The operative RPS and Proposed RPS Change 1 include direction regarding stormwater management to avoid, remedy and mitigate adverse effects on water quality arising from stormwater contaminant discharges associated with new developments. This direction includes:</p> <ul style="list-style-type: none"> Integrating planning and the design of stormwater management measures to achieve multiple improved outcomes. Considering the effects of development in relation to water quality target attribute states and relevant regional plan limits. Requiring water sensitive urban design principles in the control of stormwater infrastructure to improve water quality. Managing land use and development in way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces. Requiring financial contributions through conditions of consent where off site stormwater quality treatment is required as set out in a Stormwater Management Plan. <p>Urban intensification provided for by PC2 is likely to influence the generation of stormwater and its associated effects on water quality and quantity through the redevelopment of sites and increased impervious areas.</p> <p>Greater Wellington acknowledges and supports the provisions in the operative district plan and Land Development Minimum Requirements that already go some way to align with Proposed RPS Change 1 (Policy FW.3).</p> <p>However, further amendments are necessary to strengthen existing provisions or insert additional provisions, particularly with regards to managing development impacts on water quality and providing for multiple improved outcomes of nature-based solutions for stormwater management. Amendments may be required across the plan to address the relief requested and it is considered scope is available to do this through this ISPP. This is because related provisions in an IPI can relate to stormwater management in accordance with section 80E(2)(f) as being consequential to the MDRS and policies 3, 4 and 5 of the NPS-UD.</p>	<p>Amend PC2 to have regard to the direction on stormwater management set out in the operative RPS and Proposed RPS Change 1. This relief should consider objectives, policies, rules and matters of discretion that:</p> <ul style="list-style-type: none"> Require the application of water sensitive urban design principles, including sustainable stormwater design to minimises impacts on the natural environment and achieves outcomes additional to stormwater treatment such as providing amenity spaces, ecological habitat. Restrict the use of copper/zinc and other such building materials to manage contaminant generation. Manage effects of subdivision, use and development on water quality, waterway values including hydrological and ecosystem processes, riparian margins, water users and cultural values. <p>Amendments would be required in several plan chapters including, infrastructure, subdivision and zone chapters.</p>
Whole Plan Change	Stormwater – runoff flows and volumes	Support with amendment	<p>Stormwater runoff is likely to increase as a result of PC2 due to new growth areas and greater levels of impervious surfaces. Proposed RPS Change 1 includes direction regarding the management of stormwater:</p> <ul style="list-style-type: none"> Requiring water sensitive urban design principles in the control of stormwater infrastructure to reduce flooding. Managing land use and development in way that will minimise the extent of impervious surfaces. Requiring financial contributions through conditions of consent where off site stormwater quantity treatment is required as set out in a Stormwater Management Plan. Requiring <i>hydrological controls</i> to avoid adverse effects of runoff quantity (flows and volumes) and maintain to the extent practicable, natural stream flows. <p>Greater Wellington acknowledges and supports the provisions in the operative district plan and Land Development Minimum Requirements that already go some way to align with the direction set out in the operative RPS and Proposed RPS Change 1 (Policy FW.3). Additionally, Greater Wellington supports SUB-DW-Rx1 in PC2 and the requirement for hydraulic neutrality.</p> <p>However, it is considered the requirement for hydraulic neutrality should be extended beyond subdivision development to ensure that all new development is also required to achieve <i>hydrological controls</i> as specified in Proposed RPS Change 1 to manage potential increases in stormwater runoff quantity (flows and volumes).</p>	<p>Amend PC2 to have regard to the direction on stormwater runoff set out in the operative RPS and Proposed RPS Change 1. This relief should consider objectives, policies, rules and matters of discretion that:</p> <ul style="list-style-type: none"> Require hydrological controls for use, development and subdivision of land. Require sustainable stormwater design to minimises impacts on the natural environment and achieves outcomes additional to flood control such as providing amenity spaces, ecological habitat. <p>To achieve this relief, it is anticipated that amendments would be required in the infrastructure chapter, subdivision chapter and in zone chapters.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			Greater Wellington considers there is scope to make these amendments as related provisions in an IPI can relate to stormwater management in accordance with section 80E(2)(f).	
Whole Plan Change	Climate change, freshwater bodies – water supply	Support with amendment	<p>Urban development will increase demand for water supply for both potable and non-potable use. As the effects of climate change become more evident, changes in weather patterns may impact the availability of water sources and equally the demand for water. Water abstraction beyond sustainable limits adversely affects the health and wellbeing of freshwater bodies and together with the impacts of climate change, there are greater risks of further freshwater degradation.</p> <p>Proposed RPS Change 1 (Policies FW.2 and FW.3 in particular) seeks to manage pressures on existing water supplies and requires district plans to include provisions that improve the efficiency of end of use of water and require alternate water supplies for non-potable use in new developments. Additionally, Policy FW.5 requires consideration of how climate change may impact water supply, including water availability and water demand.</p> <p>Greater Wellington supports the operative district plan’s existing provisions that align with Proposed RPS Change 1, specifically those that require non-potable alternative water sources and provide for greywater reuse systems. However, Greater Wellington seeks for PC2 to go further.</p> <p>It is considered scope is available to make the necessary amendments as related provisions in an IPI can relate to infrastructure in accordance with section 80E(2)(d).</p>	<p>Amend PC2 to:</p> <ul style="list-style-type: none"> • Incorporate policies and rules to require improved water use efficiency for new developments. • Require new development to ensure adequate available water supply in a changing climate now and into the future. <p>It is anticipated that amendments would be incorporated into the infrastructure chapter.</p>
Whole Plan Change	Climate change – transport infrastructure	Support with amendment	<p>Proposed RPS Change 1 (Policies CC.1, CC.2, CC.3 and CC.9 in particular) seeks to manage enable changes to transport infrastructure to maximise the use of low or zero carbon transport modes, to contribute to a reduction in greenhouse gas emissions.</p> <p>Greater Wellington acknowledges the Operative District Plan has already taken steps to provide for efficient travel and maximise mode choices to enable people to act sustainably, and that further amendments to transport provisions are proposed in Plan Change 1A (accessible car parking) and 1C (cycle parking requirements). Greater Wellington supports this existing direction.</p> <p>Similarly, Greater Wellington recognise PC2 already aligns with Proposed RPS Change 1 and supports several amendments, including:</p> <ul style="list-style-type: none"> • DO-O3 which aims to deliver urban environments that support reductions in greenhouse gas emissions. • DO-O16 to reinforce a compact, well designed and sustainable District through promoting and reinforcing a close proximity and good accessibility between living, business and employment areas. • MCZ-P2 which requires subdivision, use and development in the Metropolitan Centre Zone to improve public transport networks including rail. • MCZ-P5, TCZ-P3, LCZ-P3, MUZ-P4 which requires subdivision, use and development activities in the Working Zones to promote opportunities to maximise transport choice and efficiency particularly with regards to public and community transport. • The Proposed Residential Design Guide. • TR-P2, TR-R10, GIZ-R11 which require travel plans for <i>major traffic activities</i>. <p>However, Greater Wellington considers further amendments are required to support a reduction of greenhouse gas emissions and increase opportunities for zero or low carbon public and active transport modes.</p> <p>Across the District Plan there appears to be a gap in explicit provision of EV or e-bike charging stations, and Greater Wellington considers rules and associated standards for residential</p>	<p>Amend PC2 to have regard to the direction on reducing greenhouse gas emissions set out in Proposed RPS Change 1. This relief should consider objectives, policies, rules and matters of discretion that:</p> <ul style="list-style-type: none"> • Require EV or e-bike charging stations for residential development. • Amend provisions to broaden the requirement for Travel Plans to comprehensive housing developments and subdivisions, and ensure the contents of Travel Plans is consistent with Proposed RPS Change 1 Policy CC.2. <p>To achieve this relief, it is considered amendments will likely be required to the transport chapter, infrastructure chapter and zone chapters.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<p>development should be a requirement.</p> <p>Travel Demand Management Plans, as sought by Policy CC.2, should be a requirement for any development or subdivision over a threshold specified in the District Plan. Requirements for Travel Demand Management Plans should be amended to have regard to Proposed RPS Change 1, specifically to ensure that there are measures set out to reduce reliance on private vehicles and encourage modal shift to low carbon, active or public transport options.</p> <p>Amendments may be required in several chapters across the plan. We consider scope is available to do this as related provisions in an IPI can relate to district-wide matters which would include climate change and transport in accordance with Section 80E(2)(a). Infrastructure is also a related provision under Section 80E(2)(d).</p>	
Whole Plan Change	Climate Change – Emissions Assessments	Support with amendment	<p>In managing the effects of emissions from transport, Proposed RPS Change 1 seeks to encourage a whole of life carbon emissions assessment to understand the impacts and options of any new or altered transport infrastructure (Policy CC.11). Greater Wellington seeks that PC2 has regard to this policy and suggests a new policy for the district plan. This policy should encourage carbon emissions assessment for certain types of development involving new or altered transport infrastructure and could also specify what these assessments must include.</p> <p>Scope is available through PC2 to include this additional policy direction as related provisions in an IPI can relate to district-wide matters which would include climate change and transport in accordance with Section 80E(2)(a). Infrastructure is also a related provision under Section 80E(2)(d).</p>	<p>Amend PC2 to have regard to Policy CC.11 of Proposed RPS Change 1 by:</p> <ul style="list-style-type: none"> Inserting a new policy in the transport chapter to encourage carbon emissions assessments for certain developments that include new or altered transport infrastructure.
Whole Plan Change	Climate change - resilient urban areas and nature-based solutions	Support with amendment	<p>Proposed RPS Change 1 includes direction to manage these adverse effects by supporting changes which provide for building the resilience of our urban areas particularly the use of nature-based solutions.</p> <p>Proposed RPS Change 1 seeks that district plans provide for climate-resilient urban areas, including:</p> <ul style="list-style-type: none"> Urban greening to provide urban cooling and carbon storage. The application of water sensitive urban design principles to reduce flooding, improve water quality and overall environmental quality. Capturing, storing and recycling water at a community-scale. Providing for the efficient use of water and energy in buildings and infrastructure. Providing for buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind. <p>Greater Wellington recognises and supports the provisions in the operative District Plan and PC2 which enable the erection of solar panels and roof mounted domestic scale turbines and promote energy efficiency in new development. Additionally, provisions requiring new development to provide non-potable water sources such as through roof rainwater collection and the use of low impact stormwater infrastructure are aligned with Proposed RPS Change 1.</p> <p>However, it is considered the requirement to provide for climate-resilient urban development should be strengthened to have regard to Proposed RPS Change 1 (Policies CC.4, CC.14, CC.7, CC.12 and FW.5) and consider the impacts of climate change now and into the future.</p> <p>As a district-wide matter, Greater Wellington considers climate-resilience is a matter within scope of PC2 under Section 80E(2)(a) because climate change is a district-wide matter.</p>	<p>Amend PC2 to have regard to the direction contributing to the climate resilience of the urban area as set out in Proposed RPS Change 1 Policies CC.4 and CC.14. This relief should consider objectives, policies, rules and matters of discretion that:</p> <ul style="list-style-type: none"> Seek to improve climate resilience of urban areas through measures identified in Policy CC.14. Clearly signal the Council's intent to improve the climate resilience of urban areas. Require new development to include actions and initiatives that improve broader climate resilience of the urban area Require new development to ensure adequate available water supply including consideration of how climate change may affect existing supplies and the need to develop further water supply sources. Consider the extent to which new development design will contribute to climate resilience as a matter of discretion.
Whole Plan Change	Climate change – promoting nature-based solutions in development and infrastructure	Support with amendment	<p>Proposed RPS Change 1 includes a number of provisions that recognise nature-based solutions are an integral part of the climate change mitigation and adaptation response required in the region, and also provide a number of other benefits for indigenous biodiversity and community well-being. Nature-based solutions are defined as <i>'actions to protect, enhance or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce</i></p>	<p>Amend PC2 to have regard to Policy CC.7 and</p> <ul style="list-style-type: none"> Include policy that seeks nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure. Permit the development of green infrastructure in appropriate locations and subject to

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<p><i>greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change....'</i></p> <p>Greater Wellington supports the operative district plan policy INF-MENU-P18 which considers the use of low impact design including soft engineering to manage stormwater quantity and quality. However, Greater Wellington seeks that PC2 has regard to Proposed Change 1 to the RPS and sets out a clear preference for nature-based solutions in all infrastructure and development, and provides a framework for their development. A number of actions are set out in Policy CC.14 as measures that should be considered and provided for.</p> <p>It is considered that there is scope to make the requested amendments as related provisions relating to climate change and stormwater can be included in an IPI under Section 80E(2).</p>	<p>necessary controls, i.e., planting works undertaken by regional council.</p> <p>It is anticipated that amendments would be incorporated into the infrastructure, subdivision and zone chapters.</p>
Whole Plan Change	Climate change – protecting ecosystems providing nature-based solutions	Support with amendment	<p>Natural nature-based solutions already exist and perform functions that support solutions to climate change. These areas are to be mapped by Greater Wellington by June 2024. District Plans should avoid adverse effects on ecosystems providing nature-based solutions to have regard to Policy CC.12 in Proposed RPS Change 1.</p> <p>PC2 should be amended to recognise these natural nature-based solutions and their role in managing the effects from development as part of the district's climate change response. These areas must be protected and enhanced where possible to ensure they continue to provide their functions.</p> <p>As climate change is a district-wide matter, Greater Wellington consider provisions relating to nature-based solutions are a matter within scope of PC2 under Section 80E(2)(a).</p>	<p>Amend PC2 to have regard to Proposed RPS Change 1 and include provisions for recognising the functions of the ecosystems providing nature-based solutions to climate change and avoid adverse effects of subdivision, use and development on their functions, including before they are mapped.</p> <p>Policies should:</p> <ul style="list-style-type: none"> • Direct the protection of areas that already perform a function as a nature-based solution, including the many wider benefits they can have. • Encourage the restoration of nature-based solutions.
Whole Plan Change	Biodiversity offsetting and biodiversity compensation	Support with amendment	<p>KCDC is not proposing any changes to the existing provisions for ecosystems and indigenous biodiversity protection. PC2 applies these existing provisions as qualifying matters. Greater Wellington considers this approach consistent with regional direction for indigenous biodiversity protection, except in relation to biodiversity offsetting and biodiversity compensation addressed below. We support KCDC's approach to accommodate existing qualifying matters relating to PC2 for the protection of ecosystems and indigenous biodiversity.</p> <p>Proposed RPS Change 1 sets out specific direction for the use of biodiversity offsetting and compensation, requiring that biodiversity offsets or compensations achieve an outcome of at least an overall 10% gain in biodiversity benefit. Additionally, limits to the use of biodiversity offsetting and compensation are included in Policy 24 and new Appendix 1A.</p> <p>The operative district plan includes some guidance on the principles of offsetting but does not yet have regard to the amendments set out in Proposed RPS Change 1. Development occurring as a result of PC2 may impact on significant indigenous biodiversity or habitats of significant indigenous species. In particular the application of the MDRS and Intensification Precincts overlaps with scheduled ecological sites and indigenous trees. Although it is noted the existing District Plan provisions for these matters will continue to apply as a qualifying matter, Greater Wellington consider the existing plan provisions are not sufficient as they currently exist.</p> <p>Amendments may be required across the plan to address the relief requested and it is considered scope is available to do this through this ISPP. These additional provisions or amendments would apply as existing qualifying matters and as related provisions as a district-wide matter under Section 80E(2)(a).</p>	<p>Amend PC2 to have regard to Proposed RPS Change 1 Policy 24, specifically in relation to biodiversity offsetting and compensation. Amendments to existing, or new policies, rules and appendices are expected to be necessary to achieve this relief in the Ecosystems and Indigenous Biodiversity chapter.</p>
Whole Plan Change	Mana whenua / tangata whenua values and managing indigenous biodiversity		<p>Proposed RPS Change 1 recognises the mana whenua / tangata whenua values associated with managing indigenous biodiversity in Policies IE.1 and IE.2 which seek:</p> <ul style="list-style-type: none"> • To identify and protect taonga species • To provide for mana whenua values including giving local effect to <i>Te Rito o te Harakeke</i> • Incorporate the use of mātauranga Māori in the management and monitoring of indigenous biodiversity 	<p>Amend PC2 to have regard to Policies IE.1 and IE.2 of Proposed Change 1 to the RPS, particularly to incorporate mātauranga Māori and include tangata whenua in biodiversity monitoring. Amendments are expected to be incorporated in the ecosystems and indigenous biodiversity chapter.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<ul style="list-style-type: none"> Support access to and customary use of indigenous biodiversity <p>Greater Wellington requests that PC2 has regard to these policies, specifically applying mātauranga Māori frameworks and supporting tangata whenua in managing and monitoring biodiversity. It is considered there is scope to make the necessary amendments as existing qualifying matters and as related provisions as a district-wide matter under Section 80E(2)(a).</p>	
Whole Plan Change	Integrated management and decision making	Support with amendment	<p>New provisions are required in the district plan to have regard to the Proposed RPS Change 1 direction on integrated management.</p> <p>These matters should be provided for as part of the strategic direction guiding the implementation of the District Plan, to ensure that urban intensification provided for by PC2 occurs in a holistic, integrated manner that realises the overarching objective in Proposed RPS Change 1. As a district-wide matter, Greater Wellington consider provisions regarding integrated management are within scope of PC2 under Section 80E(2)(a).</p>	Insert new strategic direction to have regard to Proposed RPS Change 1, specifically to require resource management decisions to be made using an integrated and holistic approach guided by Te Ao Māori.
Whole Plan	Earthworks	Support with amendment	<p>Intensification will result in the development or re-development of sites which will inevitably involve earthworks. Greater Wellington considers earthworks have the potential to have adverse effects on the water quality of any waterbody, wahi tapu, wahi taonga and habitat of indigenous species. Proposed RPS Change 1 includes direction to manage these adverse effects.</p> <p>We recognise and support the provisions in the operative District Plan which already align with the Operative RPS and Proposed RPS Change 1. We note specifically EW-P1, EW-R2, EW-R3, EW-R4 and EW-R7. Additionally, we support the provisions which manage earthworks which can threaten important landscape, historic heritage, archaeological and cultural values.</p> <p>However, Greater Wellington considers stronger direction is required to recognise the adverse effects of earthworks on water quality. We seek amendments which more clearly seek to minimise the potential for sediment to enter waterbodies and recognise the ecological and cultural impacts of this. Additionally, we wish to ensure this potential effect is assessed in any resource consent application involving disturbance works, including vegetation clearance which may require amendments to the matters of discretion for relevant restricted discretionary activities.</p> <p>Greater Wellington considers provisions regarding earthworks are within scope of PC2 under Section 80E(2)(b) as related provisions.</p>	Amend existing provisions, or insert new provisions, including matters of discretion to ensure that the sedimentation effects on water quality arising from earthworks associated with new development are minimised and assessed in resource consent applications. It is expected that amendments would be required in the earthworks chapter and zone chapters.
Whole Plan	Natural Hazards	Support with amendment	<p>Proposed RPS Change 1 amends policies setting out direction regarding the assessment and management of natural hazard risks and land use (Policies 29, 51 and 52).</p> <p>The operative district plan manages natural hazards adopting a risk-based approach and includes consideration of some matters outlined in the RPS. We also support PC2 including natural hazards as qualifying matters:</p> <ul style="list-style-type: none"> Flood hazard category areas and fault avoidance areas as existing qualifying matters given the overlap of the MDRS and application of Policy 3 with the flood hazard overlays. The new Coastal Qualifying Matter precinct to provide for the management of this area which is susceptible to coastal erosion hazard. <p>However, further policy direction and/or rules are requested to have regard to Proposed RPS Change 1.</p> <p>As a qualifying matter and district-wide matter, Greater Wellington considers provisions regarding natural hazard management are within scope of PC2 under Section 80E(2).</p>	<p>Amend existing provisions or insert new provisions in the Natural Hazards chapter to have regard to Proposed RPS Change 1 Policies 29, 51 and 52 and Objectives 19 and 20, including but not limited to:</p> <ul style="list-style-type: none"> Use 'minimise' instead of 'reduce' when referring to risks from natural hazards. Consider the exacerbating effects of climate change and sea level rise. Prioritise nature-based solutions, including soft engineering and, green infrastructure, room for the river, or mātauranga Māori options over hard engineering methods where possible. Minimise the impact of hard engineering methods on the natural environment where they are necessary. More clearly direct subdivision, use and development and hazard sensitive activities to be avoided in areas where hazards and risks are assessed as high to extreme. Provide guidance on the development of hazard mitigation measures, including considerations set out in Policy 52 of Change 1 to the RPS. <p>Further consequential amendments may be required in the subdivision and zones chapters.</p>
Qualifying Matters	Qualifying Matters	Support with amendment	<p>Greater Wellington supports the identification of existing qualifying matters as set out in the section 32 report for PC2.</p> <p>For these matters, Greater Wellington generally consider that the existing operative plan</p>	Amend as requested in other submission points.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			provisions notified through PC2 are appropriate. However, Greater Wellington seeks some amendments through this submission where those existing provisions may require revising, particularly to have regard to Proposed RPS Change 1.	
Marae Takiwā Precinct	Objectives, policies and rules	Support	Greater Wellington strongly supports the introduction of the Marae Takiwā precinct and associated provisions to provide for a lower level of development, to manage effects on adjacent marae. These provisions align with Proposed RPS Change 1 Policy UD.1, which seeks recognition of marae as taonga and make appropriate provision for them.	Retain as notified.
Waahi tapu And other places and areas of significance to Māori Residential Zones	Intensification adjacent to Sites and Areas of Significance to Māori	Support with amendment	<p>Greater Wellington supports existing protection of Waahi tapu and other places and areas of significance to Māori as a qualifying matter through PC2. However, Greater Wellington requests modification to the MDRS adjacent to Sites and Areas of Significance to Māori, to ensure the values of Sites and Areas of Significance to Māori are preserved as part of intensification activities.</p> <p>This request gives effect to the relevant Operative RPS Policies, namely:</p> <ul style="list-style-type: none"> (a) Policy 48 of the RPS, which directs that plans give particular regard to the principles of the Treaty of Waitangi and Waitangi Tribunal reports and settlement decisions relating to the Wellington region; and (b) Policy 49 of the RPS, which directs that plans recognise and provide for the exercise of kaitiakitanga; mauri, particularly in relation to fresh and coastal waters; mahinga kai and areas of natural resources used for customary purposes; and places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua. (c) Historic heritage policies 21, 22 and 46. <p>The extent of modification necessary will require a situation-specific impact analysis, and in some instances intensification adjacent to scheduled sites should be avoided.</p>	<p>Modify intensification levels through setbacks and reduced building heights for areas adjacent to Sites and Areas of Significance to Māori to the extent necessary following site-specific analysis, except where the associated buildings and structures will provide for tino rangatiratanga.</p> <p>This includes any necessary consequential amendments to provide this direction.</p>
Papakāinga	Whole chapter	Support	<p>Greater Wellington strongly supports the introduction of a new chapter into the district plan to address papakāinga and the amendments that provide for papakāinga development, including changes to the definition of papakāinga. We support enabling papakāinga across the district.</p> <p>The proposed provisions recognise that papakāinga is taonga and provide for tangata whenua to exercise their tino rangatiratanga with fewer restrictions. PC2 aligns with Proposed RPS Change 1 Policies UD.1 and UD.2, which also seeks provide for the relationship of mana whenua with their ancestral lands by:</p> <ul style="list-style-type: none"> • Enabling mana whenua to exercise their tino rangatiratanga • Recognising papakāinga are taonga and making appropriate provision for them • Recognising the historical, contemporary, cultural and social importance of papakāinga and • Providing for the development of land owned by mana whenua. 	Retain as notified.
Financial Contributions	Whole chapter	Support with amendment	<p>Greater Wellington supports the amendments made to the financial contributions chapter which align with Proposed RPS Change 1 Policies FW.3 and FW.4, particularly the clarity regarding how the contribution required is applied to stormwater disposal systems.</p> <p>However, it is currently unclear in the notified provisions whether financial contributions can be required to upgrade or provide new stormwater infrastructure necessary to treat increased contaminant discharges in stormwater runoff to meet water quality outcomes. PC2 makes it clear that a reason for a financial contribution is where an outfall is available but there is inadequate capacity with the cost being the value of connecting and upgrading the capacity of the network. It is not certain whether this extends to costs associated with upgrading the treatment capacity of the network rather than the volumetric capacity. Policy FW.4 in Proposed RPS Change 1 requires district plans to include policies and rules to require financial contributions to be applied for off-site stormwater quality and quantity treatment as set out in a stormwater management plan, unless a development contribution for the same purpose has already been collected. PC2 should be amended to have regard to Policy FW.4, by ensuring that</p>	Pending any review KCDC may make on a Development Contributions policy under the Local Government Act in the near future, amend PC2 to have regard to Proposed RPS Change 1 Policy FW.4 by clarifying that financial contributions for new subdivision and development can be collected to treat both stormwater quality and quantity.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			financial contributions can be collected for offsite stormwater treatment for both quality and quantity.	
Whole plan	Proposed General Residential Zone	Oppose in part	<p>Greater Wellington notes that some of the proposed new General Residential Zone in Waikanae is over existing stream corridors. Greater Wellington requests that the zone is removed from the stream corridors, and replaced with open space zone, with a setback of at least 5 m from the edge of the stream bed.</p> <p>Any intensification in flood hazard zones will impact Greater Wellington's ability to discharge its flood risk management functions. Greater Wellington will need to maintain schemes, and potentially invest more in flood defence infrastructure. There will also be a need to introduce more sophisticated flood forecasting and warning systems to the region.</p> <p>Intensification in any hazard zone is not in line with regional, national or international direction on hazards or climate change. Increasing densities within the Waikanae River flood plain will result in an increase to the vulnerability of people and property. An increase in vulnerability means an increase in risk.</p> <p>Greater Wellington notes that the KCDC policy and rule framework guiding development is generally consistent with Greater Wellington's recommended approach to managing flood hazard risk. The flood overlays are also consistent with the plan controls development within flood hazard zones and the Regional Exposure Assessment 1% AEP map.</p> <p>This request is sought by Greater Wellington to ensure the District Plan has regard to Proposed RPS Change 1 Policies 29 and 51.</p>	Remove river corridors from General Residential Zone, and amend to a more appropriate zoning, such as open space.
Flood Hazard Overlays	Flood Hazard Overlays	Support with amendment	Greater Wellington is aware that work is underway to update flood hazard maps in the District Plan. We request that the most up to date flood hazard information is used as a qualifying matter in the District Plan, to ensure that the intensification enabled by PC2 occurs in appropriate locations.	Ensure the most recent flood hazard maps are used as qualifying matters in the District Plan.
District Objectives	DO-O3	Support	Greater Wellington supports direction for developments to be centred around public transport rapid transit stops and encouraging people to live within Kapiti's existing urban environments, particularly where these are connected to transport. This will help Greater Wellington to meet goals set out in the Regional Public Transport Plan; such as the target of a 40% increase in mode shift to public transport by 2030; and improving customer experience through improving the accessibility of public transport for all. All new development should be designed with public transport and multi-modal travel in mind, to ensure residents and visitors are able to use modes other than private vehicles.	Retain as notified.
District Objectives	DO-O11	Support	Greater Wellington supports improved access to public and active modes of transport mentioned in the explanatory text. This will help Greater Wellington to meet goals set out in the Regional Public Transport Plan; such as the target of a 40% increase in mode shift to public transport by 2030; and improving customer experience through improving the accessibility of public transport for all.	Retain as notified.
Urban Form and Development	UFD-P1, UFD-P4	Support	<p>Greater Wellington supports UFD-P1 and its direction to integrate public services and infrastructure with growth.</p> <p>Greater Wellington supports increased housing densities within a walkable catchment of train stations, in that it supports an uptake of public transport use. This will help Greater Wellington to meet goals set out in the Regional Public Transport Plan; such as the target of a 40% increase in mode shift to public transport by 2030; and improving customer experience through improving the accessibility of public transport for all.</p>	Retain as notified.
Infrastructure and Subdivision chapters	Wastewater provisions	Support with amendment	Greater Wellington supports the existing direction in the infrastructure chapter of the Operative District Plan, particularly to allow for greywater reuse systems and for wastewater systems to avoid, remedy or mitigate adverse effects on the environment and maintain public safety. Greater Wellington also recognises that the Land Development Minimum Requirements have	Include direction in the District Plan, including infrastructure and subdivision provisions, to provide for de-centralised wastewater re-use and treatment (of grey and black water) and disposal using approved alternative wastewater systems (but not septic tanks, due to their existing issues with contamination and leaching) anywhere where there are constraints on the

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<p>additional direction to subdivision on infrastructure requirements.</p> <p>However, Greater Wellington considers that the District Plan should specifically provide for approved de-centralised alternative wastewater re-use and treatment (of both grey and black water) systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Septic tanks are excluded from this recommendation due to their known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained.</p> <p>Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.</p> <p>Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58. Regional plan rules would apply to discharges from all wastewater systems to manage potential impacts on groundwater and surface water quality, aquatic ecosystems and soil health. These requirements could feasibly be met by approved alternative wastewater systems in both brownfield and greenfield development.</p>	<p>existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network should still be required.</p> <p>This includes any necessary consequential amendments to provide this direction.</p>
Whole Plan	Greenhouse gas emission reduction – new provisions sought	Support with amendment	Policy CC.8 in Proposed RPS Change 1 seeks for activities regulated by the District Plan that relates to greenhouse gas emissions, to prioritise achieving a reduction in greenhouse gas emissions over offsetting emissions.	<p>Identify the type and scale of activities within the District Plan to which Policy CC.8 of Proposed RPS Change 1 applies.</p> <p>Include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions for the identified activities rather than applying emissions offsetting.</p>
Zones	Intensification in Paekakariki and other areas without reticulated infrastructure networks	Support with amendment	<p>Greater Wellington notes that PC2 proposes to intensify areas with limited existing infrastructure capacity; for example Paekakariki which does not currently have reticulated wastewater.</p> <p>Greater Wellington seeks reassurance that infrastructure capacity will be appropriately managed to support the intensification, to mitigate potential adverse effects. Ensuring adequate three waters capacity for intensification gives effect to Operative and Proposed RPS Change 1 Policy 58 and Policy FW.3 in Proposed RPS Change 1, particularly its direction on managing the effects of land use and development on drinking water and freshwater bodies.</p>	<p>Ensure that intensification is only enabled where it can be supported by sufficient three waters network capacity or alternative measures are available to mitigate potential adverse effects.</p> <p>See Greater Wellington’s submission point on provision for approved alternative wastewater systems where there are constraints on the existing network capacity.</p>
Zones	General residential zone, including precincts and residential design guide in Appendix x1	Support with amendment	<p>Greater Wellington supports well-planned intensification within the existing urban footprint in appropriate areas that are not subject to a qualifying matter. This approach is consistent with Policy 31 of Proposed RPS Change 1.</p> <p>Greater Wellington seeks for the provisions of the general residential zone and precincts to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1. This includes (but is not limited to) urban areas that are climate resilient, contribute to the protection of the natural environment and transition to a low-emission region, are compact and well connected, support housing affordability and choice, and enable Māori to express their cultural and traditional norms.</p>	Ensure the General Residential Zone provisions and residential design guide have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.
Zones	Rural zone provisions	Support with amendment	Greater Wellington seeks for the provisions of the zone to have regard to Proposed RPS Change 1 Policy 56.	Ensure the rural zone provisions have regard to Policy 56 of Proposed RPS Change 1.
Zones	Commercial and mixed-use zone provisions and Centres Design Guide in Appendix 2	Support with amendment	Greater Wellington seeks for the provisions across these zones to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1. This includes (but is not limited to) urban areas that are climate resilient, contribute to the protection of the natural environment and transition to a low-emission region, are compact and well connected, support housing affordability and choice, and enable Māori to express their cultural and traditional norms.	Ensure the Commercial and Mixed Use Zone provisions and design guide have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.
Residential Zones	Open Space Zones	Support with amendment	Greater Wellington seeks for the provisions of the Open Space Zones to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1.	Ensure the Open Space Zone provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
				qualities and characteristics.
Residential Zones	Special Purpose Zones	Support with amendment	Greater Wellington seeks for the provisions of the Special Purpose Zones to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1.	Ensure the Special Purpose Zone provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.
Residential Zones	Future Urban zone	Support with amendment	<p>Greater Wellington seeks for the provisions of the Future Urban Zone to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1.</p> <p>Greater Wellington seeks that the future urban zone gives effect to the NPS-FM by ensuring that freshwater bodies are required to be identified and protected during development planning.</p>	<p>Ensure the Future Urban Zone provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.</p> <p>Ensure future urban zone provisions have regard to Proposed RPS Change 1 policies 55, UD.3 57 and 58 as required.</p> <p>Give effect to the NPS-FM by ensuring that freshwater bodies are required to be identified and protected during development planning.</p>
Urban Form and Development	UFD-P11	Support	Greater Wellington supports amended Policy UFD-P11 retaining the consideration of natural character values, as it has regard to proposed RPS Policy 3.	Retain as notified.
General Residential Zone	GRZ-P5	Support with amendment	<p>Greater Wellington notes that natural character has not been retained in amended Policy GRZ-P5. In Greater Wellington's view, subdivision, use and development should seek to 'preserve' (rather than 'maintain') natural character in the Waikanae Beach Residential Precinct, to give effect to section 6(a) and NZCPS Policy 13.</p> <p>Further, given an overall (or component level) natural character rating is comprised of biotic, abiotic and experiential values, it is Greater Wellington's view that reinstating the deleted version of clause 3 (regarding maintaining the natural character of vegetation) would not give effect to the direction of the relevant higher order planning documents. It is requested that KCDC amend GRZ-P5 to include an additional clause, to ensure Policy GRZ-P5 also considers the preservation of natural character, as opposed to maintaining natural character of vegetation, in isolation.</p>	<p>Greater Wellington requests amendment to proposed Policy GRZ-P5, by adding a fourth clause to ensure that subdivision, use and development in the Waikanae Beach Residential Precinct also considers the protection of natural character.</p> <p>Greater Wellington also notes that recognition of the cultural context and history of the area has been removed from this policy through the PC2 amendments, and we want to ensure that these values are still recognised appropriately across the District Plan.</p>
Metropolitan Centre Zone	MCZ-R15 Matter of Discretion (2)	Support	Greater Wellington supports retaining matter of discretion (2) in amended Rule MCZ-R15, as it has regard to proposed RPS Policy 3.	Retain as notified.
Town Centre Zone	TCZ-R13 Matter of Discretion (7)	Support	Greater Wellington supports retaining matter of discretion (7) in amended Rule TCZ-R13, as it has regard to proposed RPS Policy 3.	Retain as notified.
Subdivision	SUB-resrx1 Matter of control (8)	Support	Greater Wellington supports areas of high natural character being provided for as a matter of control (8) in new Rule SUB-resrx1, as it has regard to proposed RPS Policy 3.	Retain as notified.
Subdivision	SUB-RESR27 Matter of control (8)	Support	Greater Wellington supports areas of high natural character being retained as a matter of control (8) in amended Rule SUB-RESR27, as it has regard to proposed RPS Policy 3.	Retain as notified.
Mixed Use Zone	MUZ-R12 Matter of Discretion (7)	Support	Greater Wellington supports retaining matter of discretion (7) in amended Rule MUZ-R12, as it has regard to proposed RPS Policy 3.	Retain as notified.
Hospital Zone	HOSZ-R9 Matter of Discretion (7)	Support	Greater Wellington supports retaining matter of discretion (7) in amended Rule HOSZ-R9, as it has regard to proposed RPS Policy 3.	Retain as notified.
Subdivision	SUB-RES-R25 Matters of Control (4)	Support	Greater Wellington supports areas of high natural character being retained as a matter of control (4) in amended Rule SUB-RES-R25, as it has regard to proposed RPS Policy 3.	Retain as notified.
Subdivision	SUB-RES-R26 Matters of Control (8)	Support	Greater Wellington supports areas of high natural character being retained as a matter of control (8) in amended Rule SUB-RES-R26, as it has regard to proposed RPS Policy 3.	Retain as notified.
Subdivision	SUB-RESR29 Matter of Discretion (5)	Support	Greater Wellington supports retaining matter of discretion (5) in amended Rule SUB-RESR29, as it has regard to proposed RPS Policy 3.	Retain as notified.
General Residential Zone, Urban Form and Development	Coastal Qualifying Matter Precinct and UFD-P13	Support	Greater Wellington supports the inclusion of a coastal qualifying matter precinct to manage intensification while the community process under the Takutai Kāpiti programme is underway, and that any decisions on future subdivision, use and development will be subject to the outcomes of this process.	Retain as notified.
General Residential Zone	GRZ-Px7	Support	This area is still under active discussion and consultation with the community under the Takutai Kāpiti programme and any decisions on future subdivision, use and development will be subject	Retain as notified.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			to the outcomes of this process. It is appropriate this area is exempt from the MDRS standards and NPS-UD P3.	
General Residential Zone	GRZ-R6	Support	It is acceptable that minor buildings, papakāinga and historic buildings are excluded from the rule governing development in the Coastal Qualifying Matter Precinct.	Retain as notified.
Town Centre Zone	TCZ-Px1	Support with amendment	It is acceptable that this area is exempt from the NPS-UD until the outcomes of the Takutai Kāpiti process are enacted, but it should also be excluded from the MDRS intensification standards.	Retain and include MDRS standards in point 2: “the level of subdivision and development otherwise required by <u>the MDRS standards and</u> policy 3 of the NPS-UD will not be enabled until the management of coastal hazards within the area is addressed through a future coastal environment plan change.”
Local Centre Zone	LCZ-Px1	Support with amendment	It is acceptable that this area is exempt from the NPS-UD until the outcomes of the Takutai Kāpiti process are enacted, but it should also be excluded from the MDRS intensification standards.	Retain and include MDRS standards in point 2: “the level of subdivision and development otherwise required by <u>the MDRS standards and</u> policy 3 of the NPS-UD will not be enabled until the management of coastal hazards within the area is addressed through a future coastal environment plan change.”
Local Centre Zone	LCZ-R20	Support	It is acceptable that this rule provides a non-complying status to buildings over 3 storeys until the outcomes of the Takutai Kāpiti process are enacted.	Retain as notified.
Subdivision	SUB-RES-R26	Support	Greater Wellington supports inclusion of the Coastal Qualifying Matter.	Retain as notified.
Subdivision	SUB-RES-Rx1	Support	Greater Wellington supports inclusion of the Coastal Qualifying Matter and hazards as a matter of control.	Retain as notified.
Subdivision	SUB-RES-R27	Support	Greater Wellington supports inclusion of the Coastal Qualifying Matter as a matter to exclude this area from the rule.	Retain as notified.

From: [Mika Zollner](#)
To: [Mailbox - District Planning](#)
Cc: [Matthew Hickman](#); [Fleur Matthews](#)
Subject: Greater Wellington Regional Council submission on Plan Change 2
Date: Thursday, 15 September 2022 2:08:42 pm
Attachments: [image001.png](#)
[Greater Wellington Submission Form.pdf](#)
[Attachment 1 of Greater Wellington Submission on Proposed Plan Change 2.pdf](#)
[Attachment 2 of Greater Wellington Submission on Proposed Plan Change 2.pdf](#)

Ahiahī mārie,

Please see attached Greater Wellington Regional Council's submission on Plan Change 2 and the completed Form 5. The submission consists of both Attachment 1 and Attachment 2.

Please get in touch if you have any questions.

Ngā mihi,

Mika



Mika Zöllner (she/her)

Kaitohutohu | Environmental Policy Advisor
Ph 0212267336

Greater Wellington Te Pane Matua Taiao

100 Cuba St, Te Aro, Te Whanganui-a-Tara 6011
PO Box 11646, Manners Street, Wellington 6142

Follow us online: [Facebook](#) | [Twitter](#) | [gw.govt.nz](#)

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.