

**BEFORE A PANEL OF INDEPENDENT HEARING COMMISSIONERS  
AT WELLINGTON**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHEKE  
O TE WHANGANUI-A-TARA**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions on the  
Greater Wellington Regional Council's  
Proposed Change 1 to the Regional Policy  
Statement

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**STATEMENT OF PRIMARY EVIDENCE OF VICTORIA WOODBRIDGE  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**HEARING STREAM 3 – CLIMATE CHANGE**

**(PLANNING)**

**14 AUGUST 2023**

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## 1. EXECUTIVE SUMMARY

1.1 My name is Victoria Emily Jane Woodbridge, and I am a Senior Planner at The Property Group Limited. I have been engaged by Kāinga Ora - Homes and Communities (**Kāinga Ora**) to provide evidence in support of its primary and further submissions to the Greater Wellington Regional Council's (**GWRC**) Proposed Change 1 to the Regional Policy Statement (**PC1**).

1.2 My evidence will address the following matters:

- (a) **Climate Change - General** – I recommend amendments to Policies CC.8 and CC.14 to ensure they provide appropriate guidance for matters under the control of district plans and the assessment of resource consents respectively. I also recommend a minor amendment to Objective CC.4 to strengthen the direction and align with the purpose of the Resource Management Act 1991 (**RMA**);
- (b) **Climate Change - Natural Hazards** – I recommend amendments to Policy 29 to remove the direction for district plans to include a hazard overlay as a means of managing the risks associated with natural hazards. I also recommend amendments to Method 22 to require regional councils to provide guidance on assessing hazard risk levels to ensure regional consistency; and
- (c) **Climate Change - Transport** – I recommend amendments to Policies CC.1 and CC.2 and Method CC.3 to ensure they are fit for purpose and provide appropriate direction for district plans. I also recommend amendments to the definitions of 'walkable catchment', 'travel choice assessment' and that the definition of 'optimise travel demand' is deleted.
- (d) I have recommended wording changes to the Objectives, Policies and Methods as set out in **Appendix A**; and

(e) Where appropriate I have prepared a Section 32AA assessment as set out in **Appendix B** of my evidence.

1.3 In my opinion, the underlying principles that have informed the proposed changes set out in the Kāinga Ora submissions and discussed in my evidence will better align the Regional Policy Statement (**RPS**) with the RMA as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) and other relevant national direction and higher order documents.

## 2. INTRODUCTION

2.1 My full name is Victoria Emily Jane Woodbridge. I am a Senior Planner at The Property Group Limited, based in Nelson.

2.2 I have a Bachelor of Arts (Honors) in Media Studies and English from the University of Glamorgan, UK and a Masters of Urban and Regional Planning from the University of Westminster, UK. I have over 16 years' experience working within resource management in the UK and New Zealand. I am an Associate member of the New Zealand Planning Institute.

2.3 In New Zealand I have worked for local government (Tasman District Council and Nelson City Council) and in private consultancy, undertaking work for private organisations, Government agencies and local authorities. My experience includes processing and preparation of large scale resource consent applications, private plan changes and submissions on proposed district plans. I have also been involved in full district plan reviews, Council initiated plan changes and have prepared evidence for local authority hearings and the Environment Court.

2.4 I am providing planning evidence on behalf of Kāinga Ora on PC1. I was not involved in the preparation of primary and further submissions by Kāinga Ora in relation to the PC1 but have been involved in providing evidence for Kāinga Ora on the Wellington City Council Proposed District Plan. I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within the Wellington

region. I am also familiar with the national, regional and district planning documents relevant to PC1.

### **Code of Conduct**

- 2.5 Although this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

### **Scope of Evidence**

- 2.6 Hearing Stream 3 (**HS3**) addresses submission points relating to Climate Change. In addition to general submission points on PC1 Climate Change topics, HS3 includes submission points which relate to climate change in respect of the following topics:

- (a) Agricultural Emissions
- (b) Climate Resilience and Nature Based Solutions
- (c) Energy, Waste and Industry
- (d) Natural Hazards
- (e) Transport

- 2.7 In preparing this evidence I have read and reviewed the following:

- (a) The PC1 provisions;
- (b) The Section 32 Evaluation report for PC1;
- (c) The Technical reports<sup>1</sup> referenced in the Section 32 Evaluation report;

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<sup>1</sup> Evaluation on the Preferred Regional Greenhouse Gas Reduction Target for the Wellington Region – Technical Memo from Jake Roos August 2022; Options for Setting Regional Greenhouse Gas Reduction Targets – Technical Memo from Jake Roos, July 2022; Review of GW's Internal Cost Carbon Values from Jake Roos and Darryl Jocyce, 7 October 2021.

- (d) The section 42A reports for HS3 Climate Change<sup>2</sup> and associated appendices;
- (e) The Supplementary Evidence of Gijsbertus Jacobus (Jake) Roos – Technical Evidence; and
- (f) The Statement of Evidence of Stuart Farrant – Technical Evidence – Climate Resilience and Nature Based Solutions.

### **3. AREAS OF AGREEMENT WITH SECTION 42A REPORT**

3.1 Having reviewed the relevant section 42A reports, I generally support the following recommendations by the reporting officer on various key submissions and further submissions by Kāinga Ora:

- (a) Kāinga Ora sought<sup>3</sup> deletion of Chapter 4.2 (Regulatory Policies – matters to be considered) or amendments to those policies to state more clearly the intended outcome. Council’s reporting officers recommend deletion of policies CC.12 and CC.13 and I support those deletions. I acknowledge amendments have been made to Policy CC.11 and Policies 39, 51 and 52. I agree with the reporting officers that the proposed amendments provide greater clarity and are more successfully express the intended outcomes;
- (b) Kāinga Ora sought<sup>4</sup> that Method 23, Policy 10 and Method 25 were retained as notified (i.e. deleted). Council’s reporting officer accepts these submissions and I agree that these Methods and Policy 10 are appropriately deleted through PC1;
- (c) Kāinga Ora sought<sup>5</sup> amendments to Objective CC.8. I acknowledge the amendments proposed by Council’s reporting

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<sup>2</sup> Section 42A report – Climate Change: General by Jerome Wyeth; Section 42A report – Climate Change: Agricultural Emissions by Jerome Wyeth; Section 42A report – Climate Change: Climate Resilience and Nature-Based Solutions by Pam Gues; Section 42A report – Climate Change: Energy, Waste and Industry by Jerome Wyeth; Section 42A report – Climate Change: Natural Hazards by Iain Dawes and James Beban; Section 42A report – Climate Change: Transport by Louise Allwood

<sup>3</sup> Submission point S158.001

<sup>4</sup> Submission points S158.034, S158.017, S158.035,

<sup>5</sup> Submission points S158.009

officer<sup>6</sup> and agree that the proposed amendments, whilst not addressing the relief sought by Kāinga Ora, do achieve appropriate outcomes and retains a broader scope. I agree with the reporting officer's proposed amendments; and

- (d) Kāinga Ora sought<sup>7</sup> amendments to Objective 20. I acknowledge the amendments proposed by Council's reporting officer<sup>8</sup> and agree that the proposed amendments, whilst not addressing the relief sought by Kāinga Ora, are appropriate. I agree with the reporting officer's proposed amendments.

3.2 The remainder of my evidence addresses key matters of particular interest to Kāinga Ora that remain of concern.

#### **4. CLIMATE CHANGE - GENERAL**

##### ***Objective CC.1***

4.1 The Kāinga Ora submission<sup>9</sup> supported in part the PC1 amendments to Objective CC.1. I acknowledge the amendments proposed by the reporting officer<sup>10</sup> and in particular note the amendment to refer to 'urban areas' as opposed to the notified text 'urban environments'.

4.2 However, the term 'urban environments' is consistent with the National Policy Statement on Urban Development (NPS-UD) and may, therefore, be more appropriate. I understand that the matter of this terminology will be addressed in more detail through Hearing Stream 4 (Urban Development) and whilst I consider 'urban environment' a more appropriate term this matter will be addressed in more detail in evidence provided by Kāinga Ora for Hearing Stream 4.

##### ***Policies CC.4 and CC.14***

4.3 The Kāinga Ora submission<sup>11</sup> on Policy CC.4 sought that the policy should be combined with Policy CC.14 rather than referring to CC.14

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<sup>6</sup> Section 42A report – Climate Change: General section 3.11

<sup>7</sup> Submission points S158.010

<sup>8</sup> Section 42A report – Climate Change: Natural Hazards section 3.10

<sup>9</sup> Submission point S158.004

<sup>10</sup> Section 42A report – Climate Change: General, section 3.7

<sup>11</sup> Submission point S158.015

within the policy wording. Kāinga Ora also supported<sup>12</sup> the Hutt City Council submission<sup>13</sup> on Policy CC.4 which opposed the policy on the basis of being unclear for users to understand what is required. The Section 42A reporting officer agrees<sup>14</sup> that Policy CC.4 lacks clarity due to its reliance on Policy CC.14.

- 4.4 I acknowledge the s42A report recommended<sup>15</sup> amendments to both policies and the splitting of each policy into two, one to address the responsibilities of the regional Council, and the other for district and city Councils.
- 4.5 Policy CC.4 now incorporates the notified clauses (a)-(f), with some recommended amendments, from Policy CC.14 and requires district plans to include objectives, policies, rules and methods relating to those matters.
- 4.6 A new policy CC.4A is recommended which incorporates clauses (b)-(d) of notified policy CC.14, with some recommended amendments. Policy CC.4A relates to regional plans.
- 4.7 Policy CC.14 and a new policy CC.14A in the section 42A report which is recommended, are consideration policies for district plans and regional plans respectively and generally duplicate Policies CC.4 and CC.4A.
- 4.8 In my view the amendments partly address the original submission point made by Kāinga Ora. However, given the duplication between the policies I question the necessity for both policies, although I acknowledge they are intended to serve a different purpose (consideration vs direction for district plans). The approach is also consistent with the general approach within the operative RPS to directional and 'consideration' policies.
- 4.9 In the s42A report the reporting officer acknowledges<sup>16</sup> the limitations of district councils to regulate some of the matters contained within the

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<sup>12</sup> Further Submission point FS12.007

<sup>13</sup> Hutt City Council Submission point S115.030

<sup>14</sup> Section 42A report – Climate Change: Climate Resilience and Natural Based Solutions, para 156

<sup>15</sup> Section 42A report – Climate Change: Climate Resilience and Natural Based Solutions, para 184

<sup>16</sup> Section 42A report Climate Change: Climate Resilience & Nature Based Solutions, paras 153-154

policy, in particular clauses (e) and (f). The wording of those clauses is therefore recommended to be amended to shift from a 'provide' direction in (e) to 'promote' and addition of a 'promote' direction in (f). Whilst I agree with the intent of this amendment in my opinion there are some challenges with the word 'promote' in a district plan context, and more specifically as part of consideration of a resource consent. I consider that an 'encourage' direction would be more appropriate, particularly in a resource consent process but also within a district or city plan context where policies can encourage consideration of those measures.

- 4.10 The reporting officer also recommends amendments for clauses (a)-(d). I agree with the intent of these clauses and the outcomes they seek, however, at a resource consent scale it is difficult to understand how some of these matters would practically be applied given the scale indicated.
- 4.11 For example, clause (a) requires urban green space and particularly tree canopy with a target of 10 percent tree canopy cover at a suburb scale. For a resource consent focused on a site specific development there may be equity issues with how this policy is addressed. For example, if the local context is devoid of landscaping, how would this policy be applied to a single development? What proportion of tree cover is reasonable to apportion to a single development?
- 4.12 Whilst the policy does appear to address the issue of scale through use of the wording 'as appropriate to the activity' in the chapeau and the use of 'and/or' in clause (c) for "domestic and / or community-scale" I consider the policy could be further strengthened to provide greater direction in this regard. I recommend amendments to Policy CC.14 in **Appendix A.**

### ***Policy CC.8***

- 4.13 The Kāinga Ora submission<sup>17</sup> supported in part Policy CC.8 but sought amendments to limit the policy to Regional Plans administered by

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<sup>17</sup> Submission point S158.016



GWRC. The Council's reporting officer has rejected<sup>18</sup> this submission but recommends significant amendments to the policy, however, the policy still applies to both district and regional plans.

- 4.14 The focus of the policy appears to be on both reducing greenhouse gas emissions and where that is not feasible or practical then requiring offsetting. This overarching outcome is to be achieved by applying a hierarchy of outcomes in clauses (a) to (c). The policy direction indicates that a reduction in emissions is achieved either through avoiding emissions in the first instance or reducing emissions. For existing activities, it is assumed that reducing emissions might involve installation of new technologies / features (for example) which reduce the point source discharge of greenhouse gas emissions.
- 4.15 I acknowledge that the amendments recommended by the reporting officer do provide greater directional outcomes than the notified policy. However, in my opinion the policy is still unclear as to how district plans would implement some outcomes sought through the policy. For example, CC.8(a) "*seeks that gross gas emissions are avoided or reduced where practicable*". A district plan can control the establishment of significant emitters through a non-complying or prohibited activity status, however, managing existing emitters and requiring a reduction in emissions is, in my opinion likely to be outside the legitimate control of the district plan.
- 4.16 The amended policy chapeau states that "*District and Regional Plans shall prioritise reducing greenhouse gas emissions by applying the following hierarchy in order:*"
- 4.17 The section 42A analysis<sup>19</sup> of the amendments does provide some useful insight into the officer's rationale for the amendments "*...the direction to avoid or reduce gross GHG emissions in clause a) means that the policy can be directed at new activities (avoid) and existing activities (reduce) respectively.*" This commentary provides clarity that the avoid direction is intended to apply to new activities, which could be appropriate in a district plan context as noted above. However, in

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<sup>18</sup> Section 42A report Climate Change: General, section 3.12

<sup>19</sup> Section 42A report Climate Change: General para 271

relation to existing activities, unless a further resource consent was required perhaps due to an expansion or similar, as long as the emitter is operating within the parameters of their consent or existing use rights the district plan would have no means of requiring a reduction in emissions. In my view to require a reduction in emissions would fall within the remit of the Regional Council when they assess air discharge permits. In effect, the explanation of the rationale is not consistent with the actual policy.

- 4.18 In relation to clause b) of the policy again it is practicable to direct that a district plan includes requirements for new activities in respect of offsetting requirements, but any offsetting for existing activities would again not be possible through a district plan. I note the reference to “*where practicable*” in all clauses, which does assist, but in my opinion this phrase alone does not go far enough to provide sufficient clarity as to how district plans would implement the ‘reduce’ direction.
- 4.19 I am also unclear as to why the reference to ‘objectives, policies, rules and/or methods’ has been deleted from the policy chapeau as this would seem inconsistent with other policies and the general drafting protocol within the RPS.
- 4.20 In my opinion there are several options which could improve Policy CC.8 to provide greater clarity and direction for Territorial Authorities when preparing or reviewing their district plans:
- a) The policy is split into two policies: one for district plans and one for regional plans; with an avoid direction for district plans in relation to new or expanded activities, and a reduce and avoid direction for regional plans under which air discharge permits are assessed; or
  - b) The explanation could include reference to the ‘avoid’ direction relating to new or expanded activities and the ‘reduce’ direction relating to existing facilities which would primarily be managed by the Regional Council through air discharge permits; or

- c) The policy is redrafted to provide greater directional outcomes for district plans, this may include reference to new activities in relation to the avoid direction.

- 4.21 In my opinion option (b) would be most appropriate given the wording of the policy. This option provides some further clarity and direction for district and city councils without weakening the outcomes sought through the policy. I have recommended proposed amendments in Appendix A. The proposed amendments also align the policy with other policies in the Climate Change chapter (policies CC.1 and CC.2) and assist the policy in giving effect to Objective CC.3.
- 4.22 Method CC.2 confirms that the Regional Council will provide guidance on how to prioritise reducing gross greenhouse gas emissions and when and how to allow for offsetting. This method therefore aligns with the proposed amendments to the explanation.

#### ***Objective CC.4***

- 4.23 The Kāinga Ora submission<sup>20</sup> supported in part Objective CC.4 and sought an amendment to replace 'resilience' with 'well-being'. I agree with the reporting officer that resilience does encompass well-being and I acknowledge the amendments proposed to Objective CC.4. Whilst I generally agree with the amendments proposed, I consider the Objective would be further strengthened through inclusion of the phrase 'well-being' which would be consistent with the purpose<sup>21</sup> of the Act.
- 4.24 I recommend that the objective is amended as follows (additional text in blue):

Nature-based solutions are an integral part of climate change mitigation and climate change adaptation, improving the health, well-being and resilience of people, indigenous biodiversity, and ~~the~~ natural and physical resources ~~natural environment~~.

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<sup>20</sup> Submission point S158.006

<sup>21</sup> Section 5(2) of the Resource Management Act 1991

## 5. NATURAL HAZARDS

### *Policy 29 (hazard overlay)*

- 5.1 The Kāinga Ora submission<sup>22</sup> supported Policy 29 as notified, however, Council's reporting officer has recommended<sup>23</sup> some significant amendments to this policy. In particular it is recommended that the policy direct District and City Councils to include hazard overlays within district plans.
- 5.2 The wording of clauses c) and d) indicates that hazard overlays are to be included to manage or avoid subdivision, use and development in areas identified as a hazard risk. I agree that objectives, policies and rules are necessary to manage or avoid development in those areas, however, the hazard overlays themselves do not actively contribute to the manage or avoid direction, instead they serve a spatial identification purpose. Spatially identifying hazard areas through an overlay in the Plan or through an external GIS viewer is necessary to inform the public about the hazard risk on their property, however, in my view the overlay itself is not an active part of the management or avoidance of the activity.
- 5.3 Kāinga Ora submitted on the Wellington PDP<sup>24</sup> and Plan Changes<sup>25</sup> notified by other councils within the Wellington region seeking that flood hazard overlays are located outside the district plan. The rationale for the submission is to ensure that mapping can be proactively managed outside of a district plan review or change process which, given the dynamic nature of flood hazard modelling and information, is considered a more efficient approach.
- 5.4 In my opinion, clause a) provides sufficient direction for Council's to identify areas affected by natural hazards and allows flexibility as to how this information is provided without the specific direction that an overlay is required.

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<sup>22</sup> Submission point S158.025

<sup>23</sup> Section 42A report Climate Change: Natural Hazards section 3.13

<sup>24</sup> [Plans, policies and bylaws - Hearing stream 5 - Wellington City Council](#) Statement of Evidence of Victoria Woodbridge on behalf of Kāinga Ora

<sup>25</sup> [District Plan Change 56: Enabling Intensification in Residential and Commercial Areas | Hutt City Council](#) Statement of Evidence of Karen Williams on behalf of Kāinga Ora; [Hearing stream 3 - pdportal \(poriruacity.govt.nz\)](#) Statement of Evidence of Karen Williams on behalf of Kāinga Ora

- 5.5 Flood hazard mapping in particular can be dynamic and subject to change following large weather events or updates to models and data. In my opinion Councils should have flexibility to provide spatial mapping outside their district plan rather than be directed to include hazard overlays in the Plan as this may not be the best-case scenario for all hazard mapping.
- 5.6 Having maps sitting outside of the Plan for information purposes is appropriate in the context of flood hazard information as this information is dynamic and subject to change over time. Changes may be due to improved understanding of the natural hazard, to interventions that change the location of natural hazard, or to changing real world conditions including climate change and advancements in modelling and data gathering. Therefore, it is difficult to map flood hazards within the planning maps in a way that ensures the information will stay accurate and relevant over time.
- 5.7 The reporting officer acknowledges that since the RPS became operative there has been further research and reports prepared. Given the continuing research in the field of natural hazards and the dynamic nature of flood events mapping has the potential to change in a manner which means the information in the district plan becomes out of date without a schedule 1 plan change process which has cost implications.
- 5.8 The Auckland Unitary Plan (AUP) provides an example of a Plan which adopts a set of flood hazard overlay maps which sit outside the plan and operate as interactive maps on the Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect.
- 5.9 A GIS viewer outside the Plan can assist plan users in determining whether a site may be subject to a particular flooding hazard. The fact that this GIS viewer can be updated as new information becomes available outside of a formal plan change process will make it a more reliable starting point for further assessments over time, particularly

when compared to a spatial layer within the Plan that is unable to be easily and quickly updated.

- 5.10 Through my primary evidence<sup>26</sup> on the Wellington City Council PDP I provided an opinion that allowing for alternative approaches the flood hazard mapping provides greater flexibility, while appropriately ensuring that natural hazard risks are adequately understood and managed.
- 5.11 I maintain this position and consider that the Policy 29 should be less directive in respect of how councils spatially identify natural hazard mapping to allow for opportunities to provide mapping outside the district plan. However, I acknowledge that there needs to be a correlation between the mapping and the plan provisions i.e. policies and rules. This can be achieved through the use of definitions with 'notes' which is consistent with the approach adopted by the AUP following Environment Court mediation.
- 5.12 In my opinion Policy 29, as notified and amended through the section 42A report (with the exception of including 'hazard overlays' in clauses (c) and (d)) would allow councils to progress mapping outside the district or city plan but requires provisions in the plans to manage the effects of natural hazard which is appropriate.

***Policy 29 and Method 22 (hazard risk level classification)***

- 5.13 Kāinga Ora opposed in part<sup>27</sup> the Toka Tu Ake Earthquake Commission (EQC) submission<sup>28</sup> on Policy 29. However, Kāinga Ora did agree with the EQC submission with regard to the request for additional guidance on what constitutes low, medium and high natural hazard risk to avoid inconsistent application of these terms in district plans.
- 5.14 The reporting officer accepts the submission in part<sup>29</sup> and considers that amendments recommended to Policy 29 address the issue.

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<sup>26</sup> [Plans, policies and bylaws - Hearing stream 5 - Wellington City Council](#) Statement of Evidence of Victoria Woodbridge on behalf of Kāinga Ora

<sup>27</sup> Further submission point FS12.013

<sup>28</sup> EQC Submission point S132.007

<sup>29</sup> Section 42A report Climate

However, I note that the Policy explanation note has simply included reference to documents which can be used to assist in incorporating a risk-based approach.

- 5.15 In my opinion this inclusion does not satisfactorily address the submission point and that more direct guidance within the Policy would be more appropriate to ensure regional consistency.
- 5.16 Method 22 gives effect to Policy 29. Kāinga Ora provided a further submission<sup>30</sup> in support of the Toka Tu Ake Earthquake Commission (EQC) submission<sup>31</sup> on Method 22. The submission sought to retain the phrase *“prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision-making”*.
- 5.17 Council’s reporting officer rejected<sup>32</sup> the EQC submission on the basis that Plan Change 1 already addresses the relief sought and that since the RPS became operative more research has been undertaken and incorporated into city and district plans. I agree that there will be more readily available research and information for district councils and the list provided in the explanation for 29 supports this. However, having central guidance at a regional level around identifying the level of risk (low, medium or high) could, as noted above, ensure regional consistency.
- 5.18 I agree that the deleted sentence in Method 22 is potentially inappropriate in the current context, however, I consider that the sentence could be amended to address the EQC submission and Kāinga Ora further submission. I would suggest the following amendment (additional text in blue):

**Method 22: Integrated hazard risk management and climate change adaptation planning ~~Information about areas at high risk from natural hazards~~**

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<sup>30</sup> Submission point FS12.019

<sup>31</sup> EQC Submission point S132.012

<sup>32</sup> Section 42A report Climate Change: Natural Hazards para 417

~~Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision making.~~ [Prepare and disseminate information about how to classify hazard risks as low, medium and high to ensure regional consistency.](#)

## 6. TRANSPORT

### ***Policies CC.1, CC.2, Method CC.3 and associated definitions***

- 6.1 The Kāinga Ora submission<sup>33</sup> opposed Policy CC.2 and requested the policy was deleted in its entirety. The submission was rejected<sup>34</sup> by Council's Reporting Officer in relation to deletion of the policy, however, the Officer recommends significant amendments to the Policy<sup>35</sup>.
- 6.2 The recommended amendments include a new definition of “*walkable catchment*” which is based on the Technical Transport Planning Report appended to the Transport section 42A report and intended to align with the NPS-UD direction<sup>36</sup>. The definition is intended to assist with identifying areas appropriate for intensification.
- 6.3 It is not clear whether the definition of walkable catchment will be further assessed through Hearing Stream 4 (**HS4**) in conjunction with urban development topics. However, in my view the definition of walkable catchment is intrinsically linked with the planning framework for urban development outcomes. Therefore, further planning evidence on the definition of walkable catchment may be appropriate as part of HS4 evidence.
- 6.4 I support the inclusion of a definition of walkable catchment but consider the definition could be refined to provide clearer direction. For example, the reference to walking ‘*from a specific point to get to multiple destinations*’ is vague and provides no real direction. In light of the NPS-UD Policy 3(c) I understand the intent of a walkable

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<sup>33</sup> Submission point S158.013

<sup>34</sup> Section 42A report Climate Change: Transport para 207

<sup>35</sup> Section 42A report Climate Change: Transport para 237

<sup>36</sup> National Policy Statement on Urban Development, Policy 3(c)



catchment is to provide a spatial extent for intensification around existing and planned rapid transit stops and centre zones.

- 6.5 The proposed definition, should therefore, correlate more closely with the NPS-UD Policy 3(c) because as worded currently a walkable catchment might exist anywhere in the greater Wellington region. For example, if I could get to a community hall, a river and a café (multiple destinations) within a 20 minute walk from one specific point (not necessarily my dwelling or place or work) that would constitute a walkable catchment but might actually be a relatively rural location.
- 6.6 I recommend that the definition is amended, however, I consider this is more appropriately assessed in relation to HS4, urban development where there will be wider consideration of urban intensification.
- 6.7 Walkable catchments are referred to in Policies CC.1 and CC.2.
- 6.8 In my opinion the amended Policy CC.1 has some issues with articulating what is sought to be achieved. The heading and chapeau indicate the outcomes sought are to the reduction of greenhouse gas emissions associated with use of new and altered transport infrastructure. However, the definition of 'optimise transport demand' and clauses (a) and (b) include direction where development should be located.
- 6.9 I appreciate the correlation between transport infrastructure and intensification / development to contribute to the reduction of greenhouse gases. I also understand the intent of the policy. However, I consider that the policy outcomes and policy chapeau do not fully align and the policy is generally challenging to interpret. In my opinion policies should be clear and succinct with the chapeau and any clauses closely aligning.
- 6.10 Furthermore, there seems to be a duplication between the definition of 'optimise transport demand' and clauses (a)-(c). The definition of 'optimise transport demand' is high level and clause (c) is more appropriately directed towards applicants and developers than Councils. In my opinion the definition of optimise transport demand

could be deleted as being superfluous given the direction in clauses (a)-(c).

- 6.11 Overall, I recommend that the policy is redrafted to provide greater clarity as to what outcomes are actually sought to aid plan user interpretation and the definition of 'optimise transport demand' is deleted.
- 6.12 While Kāinga Ora did not submit on Policy CC.1, I recommend amendments to better clarify Policy CC.1 within **Appendix A**. Alternatively, CC.1 should be retained as notified.
- 6.13 In relation to Policy CC.2 I acknowledge that the reporting officer has recommended significant changes to this policy and that the focus of the policy has shifted. In my opinion the amendments made do address, in part, some of the Kāinga Ora submission points in relation to Policy CC.2. I consider the amended policy is more outcome focused and achievable at a district plan level.
- 6.14 However, I consider that the policy could be redrafted to provide greater clarity and direction for councils as there appears to be duplication between the definition of 'travel choice assessment' and clauses (a)-(c) of the policy. Furthermore, there are two different directions within the policy, firstly the requirement for the travel choice assessment and secondly the requirement for district plans to include the threshold trigger. These requirements could be more clearly expressed either as two separate policies or by redrafting as recommended in **Appendix A**:
- 6.15 In light of the recommended amendments to Policy CC.2 above, I also recommend the following amendments (in blue text) to the 'travel choice assessment' definition:

**Definition - Travel Choice Assessment demand management plan**

A travel choice assessment demand management plan demonstrates how the subdivision, use and development has considered, and incorporated and maximised accessibility and connectivity to public and active transport, sustainable transport modes and supports redistribution of demand from private car use to active and sustainable

~~transport modes. sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that so that planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle, reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.~~

- 6.16 The Kāinga Ora submission<sup>37</sup> also opposed Method CC.3 which supports Policy CC.2 and sought that the method was deleted. In my opinion Policy CC.2 should be supported by Method CC.3 and so I recommend this Method should remain. However, in my view it is unclear what is meant by the word 'assist' and this should be more clearly articulated so district and city councils have an understanding of the level of guidance they can reasonable expect from the Regional Council.

## **7. CONCLUSION**

- 7.1 In conclusion I am of the opinion that the amendments sought by Kāinga Ora, as outlined and amended in my evidence, are appropriate and will assist in improving the consistency, usability and interpretation of the RPS provisions. This includes how the provisions are interpreted by both Plan users and Councils within the Wellington region.
- 7.2 Furthermore, I am of the opinion that the amendments will assist in ensuring Plan provisions align with national and regional direction.
- 7.3 In accordance with section 32AA of the RMA, I consider the amendments to the provisions are the most appropriate means of achieving the purpose of the RMA as outlined in Appendix 2.

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<sup>37</sup> Submission point S158.033

7.4 Overall, I consider the amended provisions will be efficient and effective in achieving the purpose of the RMA, relevant objectives of the RPS and other relevant statutory documents.

**Victoria Emily Jane Woodbridge**

14 August 2023



## Appendix A - Recommended Amendments to Provisions

Operative Regional Policy Statement – black text

PC1 – black text underlined or struck through

Section 42A – red text underlined or struck through

Planning Evidence –

Text convention	Description
<b>Plan Change 1 text</b>	
Black text	Operative Regional Policy Statement text
<u>Black text underlined</u>	PC1 text to be added as notified
<del>Black text struck through</del>	PC1 text to be deleted as notified
<b>Amendments recommended in the Council Officers' Section 42A report</b>	
<u>Red text underlined</u>	Text to be added
<del>Red text struck through</del>	Text to be deleted
<b>Changes sought by Kāinga Ora following review of s42A report. Consequential amendments may be required to numbering.</b>	
<u>Blue text underlined</u>	Text to be added
<del>Blue text struck through</del>	Text to be deleted

### Climate Change – General Provisions

#### **Policy CC.8: Prioritising the reduction of greenhouse gas emissions ~~reduction over offsetting~~ – district and regional plans**

District and regional plans shall include objectives, policies, rules and/or methods which to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply. ~~prioritise reducing greenhouse gas emissions by applying the following hierarchy in order:~~

- a) ~~in the first instance, gross greenhouse gas emissions are avoided or reduced where practicable; and~~
- b) ~~where gross greenhouse gas emissions cannot be avoided or reduced, a net reduction in greenhouse gas emissions is achieved where practicable, with any offsetting undertaken as close to the source of the greenhouse gas emissions as possible; and~~
- c) ~~increases in net greenhouse gas emissions are avoided to the extent practicable.~~

**Explanation:** This policy recognises the importance of reducing gross *greenhouse gas emissions* as the first priority, then reducing net greenhouse gas emissions, then avoiding increases in net greenhouse gas emissions to the extent practicable. and only using carbon removals to offset emissions from hard-to-abate sectors. ~~Relying heavily on net-emissions through offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.~~

It is anticipated that district plans will have a role in avoiding greenhouse gas emissions through controlling the establishment of new significant emitters which may increase greenhouse gas emissions and manage the extension or increase of existing facilities which are higher emitters. District plans will also contribute to reducing or avoiding greenhouse gas emissions through management of development in locations where there is greater reliance on private transport and

supporting alternative transport modes and a multi-modal shift for all development.

The intent is that Wellington Regional Council will work with city and district councils to provide coordination and guidance as to how to implement this policy, to ensure regional and district plan provisions to reduce greenhouse gas emissions from key emitting sectors in the region are co-ordinated and also complement national policy and initiatives. This work will consider issues such as scale, equity, and the type of activities to which offsetting should apply.

## **Climate Change – Climate-Resilience and Nature-Based Solutions Provisions**

**Objective CC.4:** Nature-based solutions are an integral part of climate change mitigation and climate change adaptation, improving the health, well-being and resilience of people, indigenous biodiversity, and the natural and physical resources environment.

### **Policy CC.14: Climate-resilient development urban areas – district and city council consideration**

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, seek that development and infrastructure is located, designed and constructed in ways that provide for climate-resilience, provide for actions and initiatives, particularly prioritising the use of nature-based solutions, that contribute to climate-resilient urban areas including by, as appropriate to the scale and context of the activity:

- (a) maintaining, enhancing, restoring, and/or creating urban green space at a range of spatial scales to provide urban cooling, including, providing urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: through the provision of landscaping which prioritises
  - i. prioritising the use of appropriate indigenous species, and
  - ii. working contributes towards achieving a wider target of 10 percent tree canopy cover at a suburb- scale by 2030, and 30 percent cover by 2050,
- (b) the application of water-sensitive urban design principles, hydrological controls, and other methods to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality, minimise flooding and maintain, to the extent practicable, natural stream flows,
- (c) methods to increase water resilience, including by requiring harvesting of water at a domestic and/or capturing, storing, and recycling water at a community-scale for non- potable uses (for example by requiring rain tanks, rainwater re-use tanks, and setting targets for urban roof area rainwater collection),
- (d) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change, avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem, and avoiding, minimising, or remedying other adverse effects on these functions and values,
- (e) providing for promoting encouraging the efficient use of water and energy in buildings and infrastructure, and
- (f) promoting encouraging appropriate design of buildings and infrastructure that so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall

and wind ~~over their anticipated life span.~~

#### Explanation

~~Climate change, combined with population growth and housing intensification, is increasingly challenging the resilience and well-being of urban communities and natural ecosystems, with increasing exposure to natural hazards, and increasing pressure on water supply, wastewater and stormwater infrastructure, and the health of natural ecosystems.~~

~~This policy identifies the key attributes required to ensure that development and infrastructure provides for develop climate-resilience in urban areas and requires district and regional councils to take all opportunities to provide for and encourage actions and initiatives, particularly nature-based solutions, that will prepare our urban communities for the changes to come.~~

## Climate Change – Transport Provisions

### **Policy CC.1: Reducing greenhouse gas emissions associated with transport demand and infrastructure – district and regional plans**

~~District and regional plans shall include objectives, policies, rules and/or methods that optimise transport demand by requiring all new and altered transport infrastructure to be is designed, constructed, and operated in a way that contributes to an efficient transport network, maximises mode shift, and reducinges greenhouse gas emissions by giving effect to a hierarchical approach (in order of priority), by: which ensure that greenhouse gas emissions are reduced by:~~

1. ~~requiring new and altered transport infrastructure to be designed, constructed and operated in a way that contributes to an efficient transport network and maximises mode shift; and~~
2. ~~giving effect to the following hierarchical approach (in order of priority):~~
  - I. ~~enabling development to be provided for and concentrated in locations where travel distances between residential, employment and the location of other essential services are minimized; and~~
  - II. ~~Requiring multi-modal transport networks and infrastructure to serve those developments; then~~
  - III. ~~Providing for and concentrating development within walkable catchments of public transport routes, and removing barriers for access to walking, cycling and public transport where practicable; then~~
  - IV. ~~Providing new infrastructure or capacity upgrades on the transport network to prioritise walking, cycling and public transport, such as improved or new bus and cycle lanes and measure to prioritise the need of pedestrians, cyclists and public transport above the car.~~



~~(a) Optimising overall transport demand;~~

~~(b) Maximising mode shift from private vehicles to public transport or active modes; and~~

~~(c) Supporting the move towards low and zero-carbon modes.~~

~~(a) Providing for, and concentrating, development in locations to minimise travel distances between residential, employment and the location of other essential services in combination with the delivery of multi-modal transport networks and infrastructure to serve developments; then~~

~~(b) Providing for and concentrating development within walkable catchments of public transport routes where practicable, and utilising existing space to remove barriers for access to walking, cycling and public transport; then~~

~~(c) Providing new infrastructure or capacity upgrades on the transport network to prioritise walking, cycling and public transport, such as improved or new bus and cycle lanes and measures to prioritise the need of pedestrians, cyclists and public transport above the car.~~

#### Explanation

This policy requires transport infrastructure planning (including design, construction and operation) to consider and choose solutions that will contribute to reducing *greenhouse gas emissions*; by applying a hierarchy to all new or altered transport infrastructure that supports an efficient transport network; and seeks to influence travel demand. The policy outcomes are further supported through the hierarchy which seeks to through ensuring development occurs in locations that can be best served by public transport and other low and zero-carbon transport modes. The hierarchy aims to encourage supports behaviour change through mode shift from private vehicles to public transport or active modes. This policy does not apply to aircraft.

#### **Optimise transport demand means:**

~~(a) Influencing demand spatially and reducing trip length; then~~

~~(b) Creating choices to travel via sustainable modes and reduce emissions; then~~

~~(c) Design and deliver development in a way that supports sustainable modes and an efficient transport network.~~

**Policy CC.2: Travel choice assessment demand-management plans – district plans**

~~By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development over the specified threshold to contribute to the reduction of greenhouse gas emissions by requiring consent applicants to provide a travel demand-management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for choice assessment that:~~

- ~~(a) demonstrates how the use of public transport and active modes will be maximised;~~
- ~~(b) demonstrates how the use of private vehicles will be minimised; and~~
- ~~(c) includes measures within the design of subdivision, use and development which achieves parts (a) and (b) above.~~

~~The requirement for a travel choice assessment must apply to all new subdivision, use and development over a specified travel choice development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.~~

~~As a minimum, city and district councils must use the regional thresholds set out in Table 1 as the basis for developing their own local thresholds. The regional thresholds in Table 1 will cease to apply when Policy CC.2 is given effect through a district plan. To contribute to reducing greenhouse gas emissions city and district councils must develop their own travel choice thresholds that are locally specific.~~

Table 1: Regional Thresholds

<del>Activity and Threshold per application</del>
<del>100 residential units located within a walkable catchment.</del>
<del>Commercial development of 2,500m<sup>2</sup> gross floor area</del>
<del>Greenfield subdivision over 100 residential units</del>

**Policy CC.2A: Travel Choice Assessment Thresholds – district plans**

By 30 June 2025, district plans shall include thresholds for travel choice assessments as required by Policy CC.2. As a minimum, city and district councils must use the regional thresholds set out in Table 1 as the basis for developing their own local thresholds. The regional thresholds in Table 1 will cease to apply when Policy CC.2 is given effect through a district plan. To contribute to reducing greenhouse gas emissions city and district councils must develop their own travel choice thresholds that are locally specific.

Table 1: Regional Thresholds

<u>Activity and Threshold per application</u>
<u>100 residential units located within a walkable catchment.</u>
<u>Commercial development of 2,500m<sup>2</sup> gross floor area</u>
<u>Greenfield subdivision over 100 residential units</u>

Explanation

~~The regional travel choice thresholds have been developed as a minimum and as guidance to assist city and district councils in developing their local travel choice thresholds. Local travel choice thresholds are important to reflect the differences in connectivity and accessibility between rural and urban areas. In addition, local travel choice thresholds should reflect local issues, challenges and opportunities. Local travel choice thresholds Location suitable development thresholds triggering a consent requirement for a travel demand management plan are to be developed by territorial authorities and should apply to residential, education, office, industrial, community, entertainment and other land use activities that could generate private vehicle trips and freight travel. Development thresholds should specify the trigger level (for example, number of dwellings, number of people accommodated or gross floor area) where the requirement for a travel choice assessment demand management plan requirement applies.~~

**Definition - Travel Choice Assessment demand management plan**

~~A travel choice assessment demand management plan demonstrates how the subdivision, use and development has considered, and incorporated and maximised accessibility and connectivity to public and active transport, sustainable transport modes and supports redistribution of demand from private car use to active and sustainable transport modes. sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that so that planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle, reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.~~

## Climate Change – Natural Hazard Provisions

<p><b>Policy 29</b> [Regulatory]</p>	<p><b>Policy 29: Avoiding inappropriate <u>Managing</u> subdivision, <u>use</u> and development in areas at risk from natural hazards – district and regional plans</b></p> <p>Regional and district plans shall:</p> <ul style="list-style-type: none"> <li>(a) identify areas <u>affected by</u> natural hazards; and</li> <li>(b) <u>use a risk-based approach to assess the consequences to</u> subdivision, <u>use and development from natural hazard and climate change impacts over a 100 year planning horizon;</u></li> <li>(c) include <u>objectives, polices and rules to manage</u> subdivision, <u>use and development in those areas where the hazards and risks are assessed as low to moderate;</u> and</li> <li>(d) <u>include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities</u> where the hazards and risks are assessed as high to extreme.</li> </ul> <p><b>Explanation</b></p> <p>Policy 29 establishes a framework to:</p> <ul style="list-style-type: none"> <li>1. <u>identify natural hazards that may affect the region or district; and then</u></li> <li>2. <u>apply a risk-based approach for assessing the potential consequences to new or existing subdivision, use and development in those areas; and then</u></li> <li>3. <u>develop provisions to manage subdivision, use and development in those areas.</u></li> </ul>	<p><b>Policy 29: Avoiding inappropriate <u>Managing</u> subdivision, <u>use</u> and development in areas at risk from natural hazards – district and regional plans</b></p> <p>Regional and district plans shall <u>manage subdivision, use and development in areas at risk from natural hazards as follows:</u></p> <p><del>Avoiding inappropriate <u>Managing</u> subdivision, <u>use</u> and development in areas at risk from natural hazards— district and regional plans</del></p> <p><del>Regional and district plans shall:</del></p> <ul style="list-style-type: none"> <li>a) identify areas <u>affected by</u> natural hazards; and</li> <li>b) use a risk-based approach to assess the consequences to <u>new or existing</u> subdivision, use and development from natural hazard and climate change impacts over <u>at least</u> a 100 year planning horizon <u>which identifies the hazards as being low, medium or high;</u></li> <li>c) include <u>hazard-overlays</u>, objectives, polices and rules to manage subdivision, use and development in those areas where the hazards <u>and or</u> risks are assessed as low to <u>medium moderate;</u> and</li> <li>d) include <u>hazard-overlays</u>, objectives, polices and rules to avoid subdivision, use <del>or</del> <u>and</u> development and <u>hazard sensitive activities</u> where the hazards and risks are assessed as high <del>to extreme, unless there is a functional or operational need to be located in these areas.</del></li> </ul>
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<p>areas at high risk from natural hazards, unless it is shown that the effects, including residual risk, will be managed appropriately.</p> <p>Hazard mitigation works can reduce the risk from natural hazards in high hazard areas.</p> <p>To give effect to this policy, district and regional plans should require assessments of the risks and consequential effects associated with any extensive structural or hard engineering mitigation works that are proposed. For a subdivision or development to be considered appropriate in areas at high risk of natural hazards, any hazard mitigation works should not:</p> <ul style="list-style-type: none"> <li>• Adversely modify natural processes to a more than minor extent,</li> <li>• Cause or exacerbate hazards in adjacent areas to a more than minor extent,</li> <li>• Generally result in significant alteration of the natural character of the landscape,</li> <li>• Have unaffordable establishment and maintenance costs to the community,</li> <li>• Leave a more than minor residual risk, and/or</li> <li>• Result in more than minor permanent or irreversible adverse effects.</li> </ul> <p>Examples of how this may be applied to identified high hazard areas include: fault rupture avoidance zones 20 metres either side of a fault trace; setback distances from an eroding coastline; design standards for floodplains; or, requirements for a geotechnical investigation before development proceeds on a hill slope identified as prone to failure.</p>	<p><b>Explanation</b></p> <p><u>Policy 29 establishes a framework to:</u></p> <ol style="list-style-type: none"> <li>1. <u>identify natural hazards that may affect the region or district; and then</u></li> <li>2. <u>apply a risk-based approach for assessing the potential consequences to new or existing subdivision, use and development in those areas; and then</u></li> <li>3. <u>develop provisions to manage subdivision, use and development in those areas.</u></li> </ol> <p><u>The factors listed in Policies 51 and 52 should be considered when implementing Policy 29 and when writing policies and rules to manage subdivision, use and development in areas identified as being affected by natural hazards.</u></p> <p><u>Guidance documents that can be used to assist in incorporating a risk-based approach to hazard risk management and planning include:</u></p> <ul style="list-style-type: none"> <li>• <u>Risk Tolerance Methodology: A risk tolerance methodology for central, regional, and local government agencies who manage natural hazard risks. Toka Tū Ake   EQC (2023);</u></li> <li>• <u>Planning for natural hazards in the Wellington region under the National Policy Statement on Urban Development, GNS Science Misc. Series 140 (2020);</u></li> <li>• <u>Coastal Hazards and Climate Change: Guidance for Local Government, Ministry for the Environment (2017);</u></li> <li>• <u>Risk Based Approach to Natural Hazards under the</u></li> </ul>
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		<p><u>RMA, Prepared for MfE by Tonkin &amp; Taylor (2016);</u></p> <ul style="list-style-type: none"> <li>• <u>Planning for Risk: Incorporating risk-based land use planning into a district plan, GNS Science (2013);</u></li> <li>• <u>Preparing for future flooding: a guide for local government in New Zealand, MfE (2010);</u></li> <li>• <u>Guidelines for assessing planning policy and consent requirements for landslide prone land, GNS Science (2008);</u></li> <li>• <u>Planning for development of land on or close to active faults, Ministry for the Environment (2003) and;</u></li> <li>• <u>Other regional documents and strategies relating to the management of natural hazards.</u></li> </ul>
	<p><del>This policy promotes a precautionary, risk based approach, taking into consideration the characteristics of the natural hazard, its magnitude and frequency, potential impacts and the vulnerability of development.</del></p>	

	<p>Guidance documents that could be used to assist in the process include:</p> <ul style="list-style-type: none"> <li>• Risk Management Standard AS/NZS 4360:2004</li> <li>• Guidelines for assessing planning policy and consent requirements for landslide prone land, GNS Science (2008)</li> <li>• Planning for development of land on or close to active faults, Ministry for the Environment (2003)</li> <li>• Coastal Hazards and Climate Change: A Guidance Manual for Local Government in New Zealand, Ministry for the Environment (2008)</li> <li>• Other regional documents relating to the management of natural hazards.</li> </ul> <p>This policy also recognises and supports the Civil Defence Emergency Management principles — risk reduction, readiness, response and recovery — in order to encourage more resilient communities that are better prepared for natural hazards, including climate change impacts.</p> <p>Policy 29 will act to reduce risk associated with natural hazards. The risks are to people and communities, including businesses, utilities and civic infrastructure.</p> <p>This policy and the Civil Defence Emergency Management framework recognise the need to involve communities in preparing for natural hazards. If people are prepared and able to cope, the impacts from a natural hazard event are effectively reduced.</p>	
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<p><b>Method 22</b></p>	<p>Method 22: Integrated hazard risk management and climate change adaptation planning <del>Information about areas at high risk from natural hazards</del></p> <p><u>Integrate hazard risk management and <i>climate change adaptation</i> planning in the Wellington region by:</u></p> <ul style="list-style-type: none"> <li>(a) <u>developing non-statutory strategies, where appropriate, for integrating hazard risk management and <i>climate change adaptation</i> approaches between local authorities in the region;</u></li> <li>(b) <u>developing consistency in natural hazard provisions in city, district and regional plans;</u></li> <li>(c) <u>assisting mana/tangata whenua in the development of iwi <i>climate change adaptation</i> plans.</u></li> </ul> <p><del>Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision-making.</del>  <i>Implementation: Wellington Regional Council* and city and district councils</i></p>	<p>Method 22: Integrated hazard risk management and climate change adaptation planning <del>Information about areas at high risk from natural hazards</del></p> <p><u>Integrate hazard risk management and <i>climate change adaptation</i> planning in the Wellington region by:</u></p> <ul style="list-style-type: none"> <li>(a) <u>developing non-statutory strategies, where appropriate, for integrating hazard risk management and <i>climate change adaptation</i> approaches between local authorities in the region;</u></li> <li>(b) <u>developing consistency in natural hazard provisions in <del>city,</del> district and regional plans;</u></li> <li>(c) <u>assisting mana <del>whenua</del>/tangata whenua in the development of iwi <i>climate change adaptation</i> plans.</u></li> </ul> <p><del>Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision-making.</del>  <u>Prepare and disseminate information about how to classify hazard risks as low, medium and high to ensure regional consistency.</u>  <i>Implementation: Wellington Regional Council* and city and district councils</i></p>
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## Appendix B – Section 32AA assessment

Having regard to section 32AA, the following is noted:

**Table 1: Amendments to Policy CC.14**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>• The changes ensure a more efficient and effective application of the policy by district councils.</li> <li>• The changes are effective at ensuring outcomes are achievable but continue to address the primary issue of prioritising nature based solutions to contribute to climate resilience.</li> <li>• The changes continue to align with higher order directions as they are mechanical in nature to ensure effective application of the policy.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>• There would be benefits from the changes due to clearer direction and therefore lower consenting costs as a result.</li> <li>• The implementation of the requirements would be appropriate at a site specific development level and therefore would minimise economic costs.</li> <li>• The outcomes will continue to achieve environmental benefits.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>• The risk of not acting is that there are inefficient consent consideration processes due to the scale of some requirements which cannot practically be achieved or assessed on a smaller scale.</li> <li>• There is sufficient information to ensure the risk of acting is limited.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>• The recommended amendments are considered appropriate to achieve the objectives (CC.1, CC.4, CC.6 and 22).</li> <li>• The recommended amendments also align with higher order documents and address the identified resource management issue, they are therefore appropriate to achieve the purpose of the RMA.</li> </ul>

**Table 2: Amedments to Policy CC.8**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>• The amendments proposed will ensure efficient application of the policy as they provide greater clarity for plan users and Councils.</li> <li>• The amendments are effective at achieving the objective the policy gives effect to and aligns with higher order direction.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>• The changes are consistent with the wider PDP approach, structure and framework.</li> <li>• There are no costs associated with the amendments recommended as they will improve implementation and Plan useability and interpretation.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>• I consider that the appropriateness of adopting the relief sought must be considered in the context of the format and structure of the entire PDP, inconsistency and a lack of clarity can lead to confusion and misinterpretation for Plan users.</li> </ul>

	<ul style="list-style-type: none"> <li>The risk of not acting in relation to inclusion of 'alterations' for Policy CE-P14 and Rule CE-R18 is a lack of consenting pathway for alterations and inconsistency with the approach to alterations in other Plan Chapters.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>The recommended amendment to the policy are considered to be more appropriate to give effect to the relevant objective CC.3.</li> <li>The recommended amendment to Policy CC.8 are appropriate to achieve the purpose of the RMA.</li> </ul>

**Table 3: Amendments to Objective CC.4**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>The amendment increases the effectiveness of the objective by strengthening the direction and outcomes sought and aligning the objective with the purpose of the Act.</li> <li>The amendment is efficient as it provides increased clarity and direction.</li> <li>The social, environmental and economic costs associated with the amendment would not outweigh the benefits.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>There are no costs associated with the amendments which seek only to strengthen the objective and align it with the purpose of the Act.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>The risk of not acting is that the provision, as proposed, does not fully give effect to the purpose of the Act.</li> <li>There is sufficient information to ensure the risk of acting is limited.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>The recommended amendments as set out in my evidence are therefore considered to be more appropriate in achieving the purpose of the RMA.</li> </ul>

**Table 4: Amendments to Policy 29**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>The amendments would allow Council flexibility to have flood hazard maps outside of the plan which could enable more responsive to up-to-date information and updated modelling, making it a more effective tool to ensure management of hazards is adequately addressed.</li> <li>The Policy as drafted currently provides sufficient direction to Councils to identify areas prone to hazards and the proposed s42A amendments are not considered to increase the effectiveness or efficiency of the policy.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>Allowing for flood hazard maps to be located outside of the Plan can ensure mapping is more responsive to managing effects from flood hazards as more information becomes available.</li> <li>Requiring mapping to be in the Plan has the potential to result in additional costs for the Council to undertake a Plan Change to reflect updated modelling information which may occur on a regular basis in response to updated national direction or new technical advice and data.</li> </ul>

Risk of acting or not acting	<ul style="list-style-type: none"> <li>The risk of not acting is that Councils who do not include flood hazard information in their Plans due to incomplete data, best practice or to provide for greater flexibility for updating mapping are inconsistent with the RPS.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>The recommended amendments as set out in my evidence are considered to be more appropriate in achieving the purpose of the RMA.</li> </ul>

**Table 5: Amendment to Method 22**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>The amendment to Method 22 will ensure efficient outcomes as there will be consistent guidance for district and city Councils to ensure consistent implantation of a hazard risk hierarchy.</li> <li>The amendments are effective at implementing the associated policies and objectives as they align with the outcomes sought through the policies and objectives.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>There would be an economic cost to the regional Council to assist Councils in determining hazard risk levels. However, as noted in the section 42A report much of the information has been prepared and is available and so the cost would be reduced lower as the work would involve articulating this information in a concise manner to ensure regional consistency.</li> <li>There would be economic and social benefits for district and city councils as they would have clear guidance from the regional Council and cross boundary consistency around levels of hazard risk.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>The risk of not acting is that different Councils interpret the information differently and there is regional inconsistency which would be particularly detrimental where boundaries adjoin.</li> <li>There is sufficient information to understand the risk of acting.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>The proposed amendments ensure the outcomes contained within policies and objectives would be consistently implemented with regional consistency.</li> <li>The proposed amendments will also align with the purpose of the Act.</li> </ul>

**Table 6: Amendment to Policies CC.1 and CC.2 and associated definitions**

Effectiveness and efficiency	<ul style="list-style-type: none"> <li>The definition of 'optimise travel demand' is not considered to be effective as it is very high level, duplicated by more directional outcomes within the policy, and creates confusion around the use of the words 'design and deliver' in clause (c). Deleting the definition and allowing the policy to express the outcomes is considered a more effective and efficient means of giving effect to the objective and achieving the relevant outcomes.</li> <li>The definition of 'walkable catchments' is too vague to be efficient or effective and should be redrafted to align with higher order documents (particularly the NPS-UD).</li> </ul>
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	<ul style="list-style-type: none"> <li>• The amendments proposed to Policy CC.1 ensure greater efficiency as they result in greater clarity and understanding about the intent and outcomes sought through the policy. Furthermore, the amendments ensure the policy is effective at giving effect to the relevant objective and higher documents.</li> <li>• The amendments proposed to Policy CC.2 will also ensure greater efficiency as they separate the aspects of the policy which are enduring and which will cease to apply. Whilst they are linked the separation will ensure efficient interpretation and effective outcomes.</li> <li>• The amendment to Policy CC.2 to rely on the definition of travel choice assessments rather than duplicating the outcomes in the policy ensures efficiency and effectiveness by ensuring the policy directions and outcomes are clear and directive.</li> </ul>
Costs/Benefits	<ul style="list-style-type: none"> <li>• There are limited costs associated with the proposed amendments which propose mechanical amendments to the policy wording rather than changes to the outcomes sought.</li> <li>• There are benefits associated with the proposed amendments which ensure greater clarity and direction for plan users.</li> </ul>
Risk of acting or not acting	<ul style="list-style-type: none"> <li>• The risk of not acting is a lack of clarity for plan users and confusion in the future once part of the policy is no longer applicable as district and city plans have given effect to that part of the policy.</li> <li>• There is sufficient information to understand the risks of acting.</li> </ul>
Decision about more appropriate action	<ul style="list-style-type: none"> <li>• The amendments will ensure a more effective and efficient implementation of the policies and align with the relevant objectives.</li> <li>• The recommended amendment to the policy are appropriate to achieve the purpose of the RMA.</li> </ul>