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107B Westchester Drive  
Churton Park  
WELLINGTON 6037

13<sup>th</sup> October 2022

Greater Wellington Regional Council  
Environmental Policy  
PO Box 11646  
Manners Street  
WELLINGTON 6142

**Attention: Hearings Advisor**

**BY EMAIL: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)**

*Part 1 & 4 of the First Schedule, RMA*

**SUBMISSION TO PROPOSED PLAN CHANGE 1 to the  
REGIONAL POLICY STATEMENT.**

**Name of Submitter:** Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/  
Stebbings Farmlands Ltd

**Address for Service:** 107B Westchester Drive  
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Attn: Rod Halliday

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**Submission on:** PC1 to the Regional Policy Statement.

**The specific provisions of the plan change that the submission relates are as follows:**

- New Chapter 3.1A Climate Change
- Chapter 3.9 Regional Form, Design & Function to give effect to the NPS-2020
- Chapter 4.1 Regulatory Policies – Direction to DP & RLTP

**Our submissions are as follows:**

<b>Section/Clause</b>	<b>Chapter 3.1A: Climate Change</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	Amend the Chapter to achieve better alignment with Chapter 3.9
<b>Reasons for seeking this decision</b>	The new chapter is extensive and wide-reaching and introduces eight climate change objectives including a vision for net-zero emissions by 2050. This is an ambitious target that will place a huge burden on Regional and District Councils. The issue we have with the chapter is that we believe it will work against the objectives introduced into Chapter 3.9 to give effect to the National Policy Statement on Urban Development 2020 and RM (Enabling Housing Supply & other Matters) Amendment Act 2021. These seek to facilitate an additional 25,000 houses into the Region. However, all new urban development will inevitably increase greenhouse and carbon emissions and have an environmental impact.

<b>Section/Clause</b>	<b>Chapter 3.9: Regional Form, Design &amp; Function</b>
<b>Support/Oppose</b>	<b>Support</b>
<b>We seek the following decision</b>	Leave the amendments as proposed.
<b>Reasons for seeking this decision</b>	The amendments and new provisions are supported as they give effect to the National Policy Statement on Urban Development 2020 and RM (Enabling Housing Supply & other Matters) Amendment Act 2021 that seeks to increase housing capacity in the urban areas, in particular high density/heights around centres and rapid transport stops to improve housing affordability. It is noted in the chapter introduction under the ‘lack of housing’ heading that the Wellington Region has a projected shortfall of 25,000 houses. The Lincolnshire Farm East-West corridor is also supported as long as it is identified in a timely manner and does not inhibit planned development of the area as promoted by WCC in its operative and Proposed District Plan (where it is identified a future urban zone).

<b>Section/Clause</b>	<b>Chapter 4.1: Regulatory Policies – Direction to District and Regional Plans &amp; the RLTP</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	<ul style="list-style-type: none"> <li>▪ Delete New Policy CC.2 relating to Travel Demand Management Plans</li> </ul>
<b>Reasons for seeking this decision</b>	We consider this policy to be excessive and represents an additional cost to development and the achievement of other objectives set out under Chapter 3.9 that seek to provide for an increase in housing supply. It is unrealistic to expect a developer to implement a plan that is reliant on the purchasers of private property to minimise or reduce private vehicle use, and to

	<p>increase their use of public transport.</p> <p>The new policy is also very unclear as to what the ‘<i>specified development threshold</i>’ will be therefore the policy is ambiguous and confusing. The policy does note however... ‘<i>where there is a potential for a more than minor increase in private vehicles and/or freight travel movement and associated increase in greenhouse emissions</i>’. However, in reality this would mean <u>all</u> new development areas as all new urban development will have carbon emissions and vehicle use associated with it. There is no guidance on what a <u>more than minor increase</u> in vehicles would be, making it a subjective matter and placing an unfair burden on TA’s to determine this.</p> <p>Greenfield growth areas like Churton Park are already self-sufficient with the Village Centre containing a supermarket, medical centre, pharmacy, physio, café, hairdresser and community centre. Most of the residential areas are within walking distance or short drive of the Shopping/Service Centre. Combined with the advent of working from home, a large number of people don’t make the trip to the City anymore. When residents do need to travel to the City, the suburb is well served by public transport notably the Number 1 bus route, and on regional scale Churton Park is close to the CBD. Numerous residents also own electric or hybrid vehicles further reducing carbon emissions.</p> <p>Overall, we believe requiring Travel Demand Management Plans in District Plans will be ineffective and impossible to enforce; and that efforts to curb carbon in Wellington should focus on incentivising electric car and public transport use through subsidies.</p>
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<b>Section/Clause</b>	<b>Chapter 4.1: Regulatory Policies – Direction to District and Regional Plans &amp; the RLTP</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	Delete New Policy CC.3 enabling a shift to low and zero carbon emission transport – District Plans
<b>Reasons for seeking this decision</b>	We do not consider a specific policy in the RPS is necessary to support the uptake of zero and low-carbon multi-modal transport infrastructure such as cycle-ways and EV charging network. This is because the market is driving this change in any event and requiring district plans to include objectives, policies and rules is not considered necessary to enable this shift.

<b>Section/Clause</b>	<b>Chapter 4.1: Regulatory Policies – Direction to District and Regional Plans &amp; the RLTP</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	Delete New Policy CC.4 Climate resilient Urban Areas – District Plans
<b>Reasons for seeking this decision</b>	We are not convinced that this very high level policy and the outcomes described in the explanation will be able to be implemented at a local level i.e. through subdivisions. The requirement for TA's to have objectives/policies and rules to ensure urban environments that can withstand increased temperatures, increased flooding, more intense rainfall, droughts, water scarcity and increased wind, cold spells, landslides and fires is a very broad 'catch-all' wish-list for which no amount of conditions on a subdivision could achieve. It's simply not practical or achievable and whilst it is a noble attempt to solve the climate crisis, there is only some much resource and ability for TA's to implement and achieve the outcomes sought by this policy.

<b>Section/Clause</b>	<b>Chapter 4.1: Regulatory Policies – Direction to District and Regional Plans &amp; the RLTP</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	Delete New Policy FW.3 – Urban Development effects on Freshwater and the CMA – District Plans
<b>Reasons for seeking this decision</b>	This policy is very broad and seeks to give effects to the NPS-Freshwater Management but is unnecessary as the Natural Resources Plan already contains new rules about discharges of stormwater from new urban areas and is already effectively managed. An additional policy is over-kill and unnecessary to achieve outcomes already being achieved through other means. This policy is another example of the RPS trying to cover all new government policy and guidelines and require at-capacity Councils and District Planning Teams to add more layers of regulation.

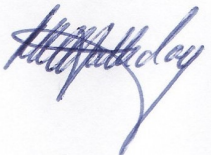
<b>Section/Clause</b>	<b>Chapter 4.1: Regulatory Policies – Direction to District and Regional Plans &amp; the RLTP</b>
<b>Support/Oppose</b>	<b>Oppose</b>
<b>We seek the following decision</b>	Delete New Policy FW.4 – Financial Contributions for Urban Development – District Plans
<b>Reasons for seeking this decision</b>	Developers are already providing stormwater neutrality for their developments and treatment in accordance with WWL guidelines and these are ensured through consent conditions. They are also paying development contributions for stormwater on a catchment and city-wide basis in Wellington and WWL also need to lead by example to attenuate and treat their stormwater within existing urban environments rather than single out new land developments. The policy is not clear about what constitutes <i>off-site</i> and is ambiguous.

We wish to speak at the hearing in support of our submission, and would consider presenting a joint case at the hearing with others who make a similar submission.

**Disclosures:** We confirm we could not gain an advantage in trade competition from making this submission. We confirm we have permission to provide this information and have read and understood the Privacy Statement.

Yours faithfully

**Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/  
Stebbing's Farmlands Ltd**

A handwritten signature in blue ink, appearing to read 'Rod Halliday', is written over a light blue rectangular background.

**Rod Halliday**  
Resource Management Planner

**Date: 13.10.2022**