

**BEFORE THE HEARING PANEL APPOINTED TO HEAR AND MAKE DECISIONS ON SUBMISSIONS  
AND FURTHER SUBMISSIONS ON THE PROPOSED WELLINGTON DISTRICT PLAN**

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

**AND**

**IN THE MATTER** of Hearing of Submissions and Further  
Submissions on the Proposed Wellington  
District Plan under Schedule 1 of the Act

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**SUBMITTER STATEMENT ON BEHALF OF GREATER WELLINGTON REGIONAL  
COUNCIL – HEARING STREAM 2**

**24 March 2023**

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## HEARING STATEMENT ON BEHALF OF GREATER WELLINGTON REGIONAL COUNCIL FOR HEARING STREAM 2 ON RESIDENTIAL ZONES

1. This Hearing Statement has been prepared on behalf of Greater Wellington Regional Council (Greater Wellington) and represents Greater Wellington's views. It is not expert evidence. Officers will be attending the hearing to speak to Greater Wellington's submission and this Hearing Statement.

### Background

2. Greater Wellington made several submission points on the residential zones, the design guides and the Proposed District Plan as a whole. These include 351.10, 351.11, 351.16, 351.19, 351.20, 351.21, 351.22, 351.23, 351.248, 351.249, 351.250, 351.251, 351.252, 351.253, 351.254, 351.255, 351.256, 351.257, 351.258, 351.259, 351.260, 351.261, 351.262, 351.263, 351.333, 351.334, 351.335 and 351.336.
3. Some matters raised in Greater Wellington's submission on the residential zones have been addressed in Hearing Stream 1; notably the classification of the Johnsonville Rail Line as rapid transit [submission point 351.50] and the need for Papakāinga to be enabled across the Plan, including the zone chapters [submission point 351.25]. Greater Wellington supports the Hearing Stream 1 Reporting Planners' Section 42A recommendation regarding the classification of the Johnsonville Rail Line as rapid transit. Greater Wellington supports the recommendation to work with Mana Whenua to develop options for addressing Papakāinga in the plan in a more in-depth manner. These matters are not addressed further in this Hearing Statement.
4. Greater Wellington submitted seeking for the whole Proposed District Plan to protect and provide for nature-based solutions to climate change more comprehensively, including a preference to implement nature-based solutions in all infrastructure planning and land use development [submission points 351.19 through 351.21]. As well as this, Greater Wellington sought for the District Plan provisions to require actions and initiatives that contribute to the broader climate resilience of the urban area [submission point 351.22 and 351.23], and that avoid, remedy or mitigate the adverse effects of urban development on the health and well-being of water bodies [submission point 351.16]. Submission

points 351.19 through 351.23 on climate resilience and nature-based solutions were addressed in Hearing Stream 1 in a very general way, saying that the Proposed District Plan has sufficient direction on these matters. This Hearing Statement addresses these submission points to the extent that they apply to the residential zones.

5. Greater Wellington sought [submission points 351.249, 351.257 and 351.261] for the Medium Density Residential Zone, the High Density Residential Zone and the Large Lot Residential Zone to have regard to Objective 22 of Proposed RPS Change 1. Objective 22 seeks for the residential zones to provide for development that demonstrates the qualities and characteristics of well-functioning urban environments, which include:

- (a) Are compact and well-designed,
- (b) Provide for sufficient development capacity to meet the needs of current and future generations,
- (c) Improve the overall health, wellbeing and quality of life of the people of the region,
- (d) Prioritise the protection and enhancement of the quality and quantity of freshwater,
- (f) Support the transition to a low-emission and climate-resilient region,
- (g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households,
- (h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga, and
- (k) Are well connected through multi-modal (private vehicles, public transport, walking, micromobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.

6. The Section 42A report for Hearing Stream 2 contends that the zone chapters currently give effect to Objective 22 in Proposed RPS Change 1.

7. Finally, Greater Wellington submitted regarding the strength of reference to the design guides, which often provide useful direction [submission points 351.10 and 351.11]. Submission points on the design guides are not addressed further in this Hearing Statement.

## **Relief sought regarding multi-unit housing in the MRZ and HRZ chapters**

8. Greater Wellington acknowledges existing direction in the Proposed District Plan to promote nature-based solutions to manage natural hazards, including coastal hazards, water sensitive urban design, vegetation retention and sustainable design. Greater Wellington commends the work done to date on this.
9. The intention with this Hearing Statement is to suggest specific amendments which would satisfy some of the relief sought in submission points relevant to the residential zones. Greater Wellington considers that the residential zone provisions could provide more comprehensive sustainable design direction to multi-unit housing to address the matters raised in Greater Wellington's submission. These amendments will better support the strategic objectives on Sustainability Resilience and Climate Change, Natural Environment, Capital City and Urban Form and Development.
10. Greater Wellington is generally supportive of the direction given in the Three Waters, Subdivision and Transport chapters. Direction on sustainable design is provided by SUB-P3 and related rules in the subdivision chapter. This provides some of the direction that Greater Wellington's submission has sought, however does not apply if subdivision is not occurring. Greater Wellington's understanding is that the Three Waters provisions require water sensitive urban design and hydraulic neutrality for four or more units, and hydraulic neutrality only for 1-3 units. Greater Wellington sought several amendments to the Three Waters chapter which are relevant to the residential zones, particularly seeking alignment with Proposed RPS Change 1. These submission points will not be considered until the District-Wide Matters hearing, and Greater Wellington will cover these points again at that time.
11. In particular, submission point 351.72 on the Three Waters chapter sought new direction on hydrological controls through Policy FW.3 of the Proposed RPS Change 1. Hydraulic neutrality is limited to managing the impacts of runoff volume on flooding. It does not manage the adverse effects of increasing impervious surfaces on the ecological health and wellbeing of freshwater bodies; the outcome sought by THW-O1 in the Proposed District Plan. Hydrological controls relate to managing the adverse effects of increasing

impervious surfaces such that natural stream flows are maintained to the extent practicable. Greater Wellington considers that hydrological controls, as well as hydraulic neutrality, should apply to both 1-3 units and multi-unit housing. Scope for seeking this in Hearing Stream 2 is provided through submission points 351.16, 351.19, 351.22, 351.23, 351.249 and 351.257.

12. The residential chapters include standards on landscaped area and permeable surfaces for 1-3 units (MRZ-S9, MRZ-S10, HRZ-S9, HRZ-S10), however they do not apply to multi-unit housing. Greater Wellington considers it is appropriate for the standards to apply to multi-unit housing. Greater Wellington's submission sought that the permeable surface requirements (both the policies and standards) in the residential zones be moved to the Three Waters Chapter and apply to four or more units [submission points 351.73 and 351.74]. This point will also be addressed in the District-Wide Matters hearing.
13. Greater Wellington considers that the proposed residential zone provisions provide appropriate direction to 1-3 units, given what is practical at that scale, with the exception of hydrological controls as outlined in paragraph 11. Multi-unit housing development is at a scale where a more holistic approach to the site can be taken, with more opportunities to consider the application of nature-based solutions and climate resilience strategies, as well as providing connectivity and accessibility. It is important for multi-unit housing to be designed well for it to positively contribute to the vitality and vibrancy of Wellington City, improve the health, wellbeing and quality of life for people, and protect and enhance the natural environment.
14. Greater Wellington acknowledges that the Residential Design Guide as notified provides integrated direction on several matters that align with Proposed RPS Change 1, including carbon reduction, management of stormwater and vegetation. However, the plan provisions themselves should also be stronger to provide a clear and holistic intention for residential development, as is the case with SUB-P3 in the subdivision chapter. It is therefore Greater Wellington's view that stronger direction to multi-unit housing on sustainable design is appropriate within the Proposed District Plan.
15. The residential zones are an important place to achieve good design outcomes by

providing **integrated direction to new development**. Strengthening the MRZ and HRZ provisions to complement the direction in the Three Waters, Subdivision and Transport chapters, as well as the residential design guide, would ensure that all multi-unit housing must consider sustainable design measures as part of demonstrating the characteristics and qualities of well-functioning urban environments.

16. In summary, the relief sought in submission points 351.19, 351.22, 351.23, 351.72, 351.249 and 351.257, as they relate to the residential zones, would be provided for with the following amendments:

<b>Amendment sought</b>	<b>Justification</b>
<p>Add clauses to MRZ-P6 and HRZ-P6 (specific drafting is provided in Attachment 1) on multi-unit housing to provide for:</p> <ul style="list-style-type: none"> <li>a. direction on sustainable design in SUB-P3,</li> <li>b. direction on climate resilience given by Policy CC.14 in Proposed Change 1 to the Regional Policy Statement,</li> <li>c. direction given by Objective 22 (particularly clauses (a), (c), (d), (f) and (k)) in Proposed Change 1 to the Regional Policy Statement,</li> <li>d. direction given regarding hydrological controls in Policy FW.3 in Proposed Change 1 to the Regional Policy Statement, and</li> <li>e. more explicit emphasis on urban greening to align with the recent report on urban green space by the Parliamentary Commissioner</li> </ul>	<p>MRZ-P6 and HRZ-P6 are matters of discretion for residential activities and construction over 3 units in both the Medium Density and High Density Residential zones. The current policies are limited in scope regarding multi-unit housing, and do not provide integrated direction on sustainable design to applicants. They present a good opportunity to better achieve the outcomes sought in objectives SRCC-O1, SRCC-O3, SRCC-O4, NE-O4, CC-O3, UFD-O2 and UFD-O7 in particular, as well as Proposed RPS Change 1.</p>

for the Environment <sup>1</sup> .	
Add permeable surfaces Policies MRZ-P9 and HRZ-P9 as matters of discretion for MRZ-R14(2) and HRZ-R14(2) respectively.	These policies do not currently apply to multi-unit housing as a matter of discretion but should apply in addition to the Three Waters chapter, to achieve appropriate stormwater management.
Add landscaped area standards (MRZ-S9 and HRZ-S9) and permeable surface area standards (MRZ-S10 and HRZ-S10) as matters of discretion to MRZ-R14(1) and HRZ-R14(1) respectively. Remove the multi-unit housing exclusion within these standards. Strengthen the direction for this landscaped area to be comprised of indigenous species and promote urban canopy cover, including through the assessment criteria.	These standards do not apply to multi-unit housing. Preference for indigenous planting aligns with the operative and proposed Regional Policy Statement, and emphasis on urban canopy cover aligns with recommendations regarding private green space in the recent Parliamentary Commissioner report on urban green space.
Apply direction for hydrologic controls to 1-3 units, either through Residential Zone provisions or Three Waters chapter provisions.	Hydrologic controls to maintain natural stream flows are necessary to manage the adverse effects of increases in impervious surfaces. They are therefore required in addition to hydraulic neutrality which manages peak runoff volumes for flooding purposes.

17. Clause 8 in the proposed additions to MRZ-P6 and HRZ-P6 reflects the need to apply hydrological controls for the ecological health of freshwater bodies in multi-unit housing, as well as hydraulic neutrality.

<sup>1</sup> [Are we building harder, hotter cities? The vital importance of urban green spaces | Parliamentary Commissioner of Environment \(pce.parliament.nz\)](https://www.parliament.nz/en/committees/parliamentary-commissioner-of-the-environment/2022-23/are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces)

18. Clause 9 in the proposed additions refers to the way that multi-unit housing is designed to maximise accessibility and connectivity, relating to clause (k) of Objective 22 in Proposed RPS Change 1. An example of this would be to arrange units so that they have direct walking and cycling access to footpaths which is not interrupted by carparking or driveways. It could also include connecting existing walking or cycling paths from units to green space or retail, and clustering vehicle parking or access away from the street front.
19. Clause 10 in the proposed additions reflects direction that is given to non-residential activities and buildings by MRZ-P15 and HRZ-P14, to reduce reliance on private motor vehicles. Greater Wellington considers that this direction should also apply to multi-unit housing; direction which is clearly provided by Proposed RPS Change 1.
20. Clause 14 in the proposed additions seeks increased urban greening to mitigate urban heat, increasing climate resilience, as well as providing broader benefits for urban populations. The recent report from the Parliamentary Commissioner for the Environment<sup>1</sup> highlights the importance of retaining existing, and promoting new, urban green space. The report recommends the inclusion of more explicit provisions for green space in statutory planning documents, and addresses the limited direction provided by the MDRS landscaped area standards to improve the quality of private green space. The report suggests that landscaped area standards should seek good outcomes such as minimum tree provision, which aligns with the relief sought by Greater Wellington to promote tree canopy cover for urban cooling.

## Attachment 1 – Specific drafting changes to MRZ-P6 and HRZ-P6 (additions underlined)

<p><b>MRZ-P6 and HRZ-P6</b></p>	<p><b>Multi-unit housing</b></p> <p>Provide for multi-unit housing where it can be demonstrated that the development:</p> <ol style="list-style-type: none"><li>1. Fulfils the intent of the Residential Design Guide;</li><li>2. Provides a minimum area of private or shared outdoor living space that is sufficient to cater for the needs of future occupants;</li><li>3. Provides an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development;<del>and</del></li><li>4. Is adequately serviced by three waters infrastructure or can address any constraints on the site;</li><li>5. <u>Is designed to maximise energy efficiency;</u></li><li>6. <u>Incorporates water sensitive urban design;</u></li><li>7. <u>Achieves hydraulic neutrality;</u></li><li>8. <u>Applies hydrological controls that avoid adverse effects of increased impervious surfaces and maintain, to the extent practicable, natural stream flows;</u></li><li>9. <u>Supports safe and accessible connections between units, street fronts, amenities and existing transport links;</u></li><li>10. <u>Reduces reliance on travel by private motor vehicle;</u></li><li>11. <u>Is designed to be resilient to the effects of climate change, including the impacts of future temperatures, intensity of rainfall and wind;</u></li><li>12. <u>Provides for the efficient use of water;</u></li><li>13. <u>Encourages the capturing, storing, and recycling of water; and</u></li><li>14. <u>Maintains, enhances, restores, or creates urban greening to provide urban cooling, including increasing tree canopy cover.</u></li></ol>
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<sup>i</sup> [Are we building harder, hotter cities? The vital importance of urban green spaces | Parliamentary Commissioner of Environment \(pce.parliament.nz\)](https://www.parliament.nz/en/committees/committee-on-the-environment/2018-2019/are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces)