

Section 32AA Evaluation of amendments to the Proposed Wellington District Plan (PDP) sought in submissions of Stride Investment Management Limited and Investore Property Limited (Hearing 5)

Amendments sought to THW-P5, THW-R6 and Hydraulic Neutrality Definition.

Effectiveness and efficiency	The recommended amendments to THW-P5, THW-R6 and <i>Hydraulic Neutrality</i> Definition as set out in my evidence remove the references to an “undeveloped state” and replace these with “pre-developed state”. These amendments are more efficient and effective in achieving the objectives, including THW-O3, of the District Plan as the amended provisions will provide greater clarity and avoid requiring a standard of stormwater runoff which would be overly onerous and difficult to assess. The recommended amendments would also achieve greater consistency with Wellington Water’s definition of hydraulic neutrality.
Costs/Benefits	<p>Environmental:</p> <ul style="list-style-type: none"> • There is an environmental cost in enabling greater stormwater flows in comparison to that of the undeveloped or modelled grass state of the site. However, this is not an increase in comparison to the state of the site prior to any proposed development. <p>Economic:</p> <ul style="list-style-type: none"> • There are economic benefits in providing greater clarity and consistency with Wellington Water guidance on hydraulic neutrality, and in removing an inappropriately onerous standard of hydraulic neutrality. These benefits include efficiency benefits as it would be more difficult to model the grass state of the site than the pre-developed state of the site. <p>The recommended amendments will not have any greater cultural or social effects than the notified or s42A provisions.</p>
Risk of activity or not acting	The risk of not acting is that the notified and s42a approach would apply overly onerous requirements around stormwater run-off, and would apply a standard of hydraulic neutrality that is difficult to assess, and inconsistent with Wellington Water’s guidance.
Decision about more appropriate action	The recommended amendments as set out in my evidence are therefore more appropriate in achieving the purpose of the RMA than the PDP or the proposed changes set out in the section 42A report.

Amendments sought to NH-R11

Effectiveness and efficiency	The recommended amendments to NH-R11 as set out in my evidence are more effective and efficient as they provide consistency with the Discretionary activity status under NH-R13, and a discretionary activity status is more appropriate than non-complying activity status to consider proposals that do not achieve floor levels above inundation levels, with allowance for freeboard.
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Costs/Benefits	<p>Economic:</p> <ul style="list-style-type: none"> • Achieves an appropriate balance while providing for development and addressing natural hazard risk. • The Discretionary activity status is not unnecessarily onerous and so does not unnecessarily limit development, but still allows consideration of objectives and policies and still gives Council the ability to decline an application based on the merits of the proposal. <p>The recommended amendments will not have any greater cultural, social or environmental effects than the notified provisions.</p>
Risk of activity or not acting	<p>The risk of not acting is that non-compliance with floor level requirements for new buildings containing hazard sensitive activities would be a non-complying activity and unnecessarily onerous, this would also result in inconsistency between the Natural Hazard rules.</p>
Decision about more appropriate action	<p>The recommended amendments as set out in my evidence are therefore considered to be more appropriate in achieving the purpose of the RMA than the PDP or the proposed changes set out in the section 42A report.</p>