

Section 32 Evaluation Report

Part 2: Future Urban Zone, Upper Stebbings and Glenside West Development Area and Lincolnshire Farm Development Area

Contents

1.0	Overview and Purpose	5
1.1	Introduction to the resource management issues	5
2.0	Reference to other evaluation reports	7
3.0	Strategic Direction	9
4.0	Regulatory and policy direction	13
4.1	Section 6	13
4.2	Section 7	13
4.3	Section 8	14
4.4	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 14	
4.5	National Direction	15
4.5.1	National Policy Statements	15
4.5.2	Proposed National Policy Statements	19
4.5.3	National Environmental Standards	20
4.5.4	National Planning Standards	22
4.6	National Guidance Documents	23
4.7	Regional Policy and Plans	23
4.8	Iwi Management Plan(s).....	28
4.9	Relevant plans or strategies	28
4.10	Spatial Analysis	31
4.11	Other relevant legislation or regulations.....	35
5.0	Resource Management Issues Analysis	35
5.1	Background.....	35
5.2	Evidence Base - Research, Consultation, Information and Analysis undertaken.....	36
	Review of Lincolnshire Farm Structure Plan Employment Land – February 2021	37
5.2.1	Analysis of Operative Wellington District Plan provisions relevant to this topic.....	39
5.2.2	Analysis of other District Plan provisions relevant to this topic	42
5.2.3	Advice received from Taranaki Whānui and Ngāti Toa Rangatira	44
5.2.4	Consultation undertaken to date	45
5.3	Summary of Relevant Resource Management Issues.....	48
6.0	Evaluation of the Proposal	52
6.1	Scale and Significance	52
6.2	Quantification of Benefits and Costs	56
7.0	Zone Framework	58
8.0	Overview of Proposals	58
9.0	Qualifying Matters	63
10.0	Evaluation of Proposed Objectives	64
10.1	Introduction	64

10.2	Evaluation of Objectives FUZ-O1, FUZ-O2 and FUZ-O3	65
10.3	Evaluation of Objectives under Lincolnshire Farm Development Area and Upper Stebbings and Glenside West Development Area	69
11.0	Evaluation of Reasonably Practicable Options and Associated Provisions	73
11.1	Introduction	73
11.2	Evaluation method	73
11.3	Provisions to achieve Objectives in the Future Urban Zone, Lincolnshire Farm Development Area, and Upper Stebbings and Glenside West Development Area	73
12.0	Conclusion	96
	Appendix 1: Greenfield Monitoring Review	97
	Appendix 2: Topic relevant feedback on Draft District Plan 2021	117

Table of Figures

Figure 1.	Location of Wellington's Future Urban Zoned areas.....	6
Figure 2.	Opportunity Sites as identified in the Our City Tomorrow: A Spatial Plan for Wellington City 2021	32
Figure 3.	Upper Stebbings and Glenside West concept masterplan 2018	33
Figure 4.	Lincolnshire Farm masterplan 2022	34

Table of acronyms

Abbreviation	Full term
DEV2	Lincolnshire Farm Development Area.
DEV3	Upper Stebbings and Glenside West Development Area
FUZ	Future Urban Zone
HBA 2019	Wellington Regional Housing and Business Capacity Assessment 2019
NES	National Environmental Standards
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-ET	National Environmental Standards for Electricity Transmission Activities 2009
NES-FW	National Environmental Standards for Freshwater 2020
NES-PF	National Environmental Standards for Plantation Forestry 2017
NPS	National Policy Statements
NPS-ET	National Policy Statement for Electricity Transmission 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement for Urban Development 2020
ODP	Operative District Plan
ONFL	Outstanding Natural Features and Landscapes
PDP	Proposed District Plan
PNRP	Proposed Natural Resources Plan
RMA	Resource Management Act
RPS	Regional Policy Statement for the Wellington Region 2013
SALs	Special Amenity Landscapes
SNAs	Significant Natural Areas
UFD	Urban Form and Development

1.0 Overview and Purpose

1.1 Introduction to the resource management issues

This Section 32 evaluation report is focused on the:

- Future Urban Zone
- Upper Stebbings and Glenside West Development Area
- Lincolnshire Farm Development Area.

Wellington is facing significant population growth in the coming decades. It is expected that the city's population will grow by approximately 70,000 people in the next 30 years. To accommodate this population increase, an additional 36,621 new dwellings are required¹. The growth strategy set out in the *Our City Tomorrow: A Spatial Plan for Wellington City* directs growth around existing centres where there is good access to services and amenities and/or public transport.

This growth strategy is supported by the direction in the National Policy Statement for Urban Development 2020 (NPS-UD) which requires growth to be enabled within walking distance of metropolitan centres and mass rapid transit stations. This growth approach has a focus on infill and 'brownfield' development. However, to support the population and associated business growth, the *Wellington Regional Housing and Business Capacity Assessment 2019* (HBA 2019) has identified that 'greenfield' development (new urban development on rural land) also plays an important role.

Wellington City Council has identified two geographically separate greenfield sites where urban development will be facilitated to contribute to identified housing demand. These greenfield sites play a strategic role in allowing for urban development adjacent to existing urban extents and contributing to a compact urban form.

The two areas in Wellington that have been identified for greenfield development, are Lincolnshire Farm and Upper Stebbings/Glenside West. Both are located between Johnsonville and Tawa on either side of State Highway 1 (see Figure 1). Lincolnshire Farm is already zoned for urban development and has existing provisions in the Operative District Plan, including a Structure Plan that outlines the vision and principles for urban development in the area. City strategies have identified Upper Stebbings/Glenside West for future urban development for more than 50 years but the area is currently zoned rural in the Operative District Plan, so the proposed District Plan will result in a significant change for this area by making way for urban development.

¹ Wellington Regional Housing Assessment Capacity Update 2021



Figure 1. Location of Wellington's Future Urban Zoned areas

Wellington City Council has identified in their 2021 Housing Capacity Assessment Review that the greenfield areas have a feasible supply of 2,721 new residential sections, making up only a small capacity of the overall housing demand required but providing an opportunity to utilise these sites in an efficient manner that contribute to critical housing demand, as well as providing for additional business land at one of the greenfield areas to generate employment opportunities. Greenfield areas are therefore important for ensuring Council is meeting the requirement of the NPS-UD to ensure sufficient land is available for housing and business purposes.

There are some key issues that are common for greenfield development and have also been identified through the current Lincolnshire Farm provisions. The primary goal of greenfield development is to create a well-functioning new urban environment that is well serviced and connected. Given the long timeframes of greenfield development, there needs to be a certain amount of flexibility provided for in the District Plan provisions to enable responses to unforeseen challenges or a changing environment. In Wellington’s case, the steep undulating topography of the identified greenfield sites are a key challenge that creates a large amount of uncertainty in terms of where infrastructure and development can be located.

Recognising that these sites are not currently in a position to accommodate urban development, the two greenfield sites are zoned as Future Urban within the Proposed Plan. The Future Urban Zone (FUZ) acknowledge that these greenfield sites are suitable for urban development in time but are not currently ready to accommodate such development. Therefore, the Future Urban zoning restricts interim activities to rural, conservation and recreational uses which do not compromise the future urban use of the sites.

To ensure that the greenfield sites are developed to make efficient use of the land, a Development Area with an associated Development Plan is required before urban development is enabled which will manage growth and development at a site-specific level. The Proposed Plan contains two Development Plans, one for the Lincolnshire Farm Development Area and one for the Upper Stebbings and Glenside West Development Area. These Development Plans are responsive to site level constraints and opportunities that allow for consideration of how to utilise the greenfield sites for effective development.

Each Development Area also has a tailored provisions framework which manages activities within that area and is reflective of local environmental constraints. The Proposed Plan contains an appendix for each Development Area, within which are specific requirements for the delivery of social infrastructure, which includes timing, quantity, and quality expectations.

2.0 Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Table 1: Relationship of other evaluation reports to this topic

Report	Relationship to this topic
Subdivision	Any subdivision occurring in the Development Areas, or the FUZ itself will be required to comply with the relevant subdivision provisions including minimum number of allotments and minimum allotment sizes.
Earthworks	This chapter contains district-wide rules for the control of earthwork activities, and of particular relevance are the policies and rules which relate to earthworks within the identified Development Areas.

Three Waters Infrastructure	New development in the FUZ and Development Areas will be required to meet the relevant three waters infrastructure requirements (wastewater, stormwater, water supply) within this chapter.
Natural Hazards	The Natural Hazards provisions manage activities in light of identified hazards to life and property, with controls applying to the hazards identified within the FUZ and associated Development Areas.
Ecosystems and Indigenous Biodiversity	This topic manages activities within or affecting identified Significant Natural Areas (SNAs) to protect indigenous biodiversity. SNAs have been identified within the Development Areas and therefore any development or activities will be required to comply with these provisions.
Transport	The Transport provisions include controls on vehicle trip generations, parking and driveway design requirements, and parking space provision minimums for cycling and micro mobility. Relevant development in the FUZ and Development Areas will need to meet these requirements where applicable.
Infrastructure	This chapter contains the provisions relating to activities associated with the development, maintenance, upgrading and operation of the national grid, other regionally significant infrastructure and network utilities. Infrastructure planning and development of structure plans to enable urban development within FUZ areas will need to be in accordance with this chapter.
Residential Zones	These chapters contain provisions relating to the management of the Medium Density Residential zone. As both of the FUZ areas will ultimately be predominantly residential in nature, the provisions in the Development Areas controlling layout and built form of development mimics and sometimes references policies and standards in the Medium Density Residential Zone. The residential design guides will work with the Residential provisions to help achieve desired outcomes.
Commercial Zones	This chapter contains provisions relating to the management of the commercial and centres zones, of which the Local Centre is applicable for the Lincolnshire Farm Development Area. The layout and built form of local centre in Lincolnshire Farm will ultimately be enabled and regulated by these provisions, therefore the proposed provisions in the Lincolnshire Farm Development Area mimic those provisions in the centres zones. The Centres and Mixed-Use design guide will work with the centres provisions to help achieve desired outcomes for these areas.
Signs	Any signs erected within the FUZ or the proposed Development Areas will need to meet the requirements for signage size and location as detailed within this chapter.

Other chapters that may be of relevance are:

- Contaminated Land
- Light, Noise and Temporary Activities

3.0 Strategic Direction

The following objectives in the Strategic Direction chapter of the Proposed Plan that are relevant to this issue/topic are:

Table 2: Relevant objectives in the Strategic Direction chapter

AW-O4	Anga whakamua – Moving into the future
The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging	
CC-O3	Capital City
Development is consistent with and supports the achievement of the following strategic City goals:	
<ol style="list-style-type: none"> 1. Compact: Wellington builds on its existing urban form with quality development in the right locations. 2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design. 3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy. 4. Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets. 5. Greener: Wellington is sustainable and its natural environment is protected, enhanced and integrated into the urban environment. 6. Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership. 	
CEKP-O1	City Economy, Knowledge and Prosperity
A range of commercial and mixed-use environments are provided for in appropriate locations across the City to:	
<ol style="list-style-type: none"> 1. Promote a diverse economy 2. Support innovation and changes in technology 3. Facilitate alternative ways of working 	
CEKP-O2	City Economy, Knowledge and Prosperity
The City maintains a hierarchy of centres based on their role and function, as follows:	
<ol style="list-style-type: none"> 1. City Centre – the primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily accessible and easy to get around and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs. 2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential 	

<p>activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres are will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre.</p>	
<p>3. Local Centres – these centres service the surrounding residential catchment and neighbouring suburbs. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City’s public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more housing with enablers of growth such as walkable access to public transport, and community facilities and services.</p>	
<p>4. Neighbourhood Centres - these centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day needs. These centres are generally for small commercial clusters and community services. Neighbourhood Centres are accessible by public transport and active transport modes.</p>	
CEKP-O3	City Economy, Knowledge and Prosperity
<p>Mixed use and industrial areas outside of Centres:</p> <ol style="list-style-type: none"> 1. Complement the hierarchy of Centres 2. Provide for activities that are incompatible with other Centres-based activities; and 3. Support large scale industrial and service-based activities that serve the needs of the City and wider region. 	
NE-O1	Natural Environment
<p>The natural character, landscapes and features, and ecosystems that contribute to the City’s identity and have significance for mana whenua as kaitiaki are identified, recognised, protected, and, where possible, enhanced.</p>	
NE-O2	Natural Environment
<p>Future subdivision and development is designed to limit further degradation of the City’s water bodies, and recognises mana whenua and their relationship to water (Te Mana o Te Wai).</p>	
NE-O3	Natural Environment
<p>The City retains an extensive open space network that:</p> <ol style="list-style-type: none"> 1. Is easily accessible; 2. Connects the urban and natural environment; 3. Supports ecological, cultural, and landscape values; and 4. Meets the needs of anticipated future growth. 	
NE-O4	Natural Environment
<p>Mana whenua are able to exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori in the protection and management of the natural environment.</p>	

SCA-01	Strategic City Assets and Infrastructure
<p>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</p> <ol style="list-style-type: none"> 1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised; 2. The City is able to function efficiently and effectively; 3. The infrastructure network is resilient in the long term; and 4. Future growth and development is enabled and can be sufficiently serviced. 	
SCA-02	Strategic City Assets and Infrastructure
<p>New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:</p> <ol style="list-style-type: none"> 1. Can meet the development infrastructure costs associated with the development, and 2. Supports a significant increase in development capacity for the City. 	
SCA-03	Strategic City Assets and Infrastructure
<p>Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.</p>	
SCA-05	Strategic City Assets and Infrastructure
<p>The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.</p>	
SCA-06	Strategic City Assets and Infrastructure
<p>Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.</p>	
SRCC-01	Sustainability, Resilience and Climate Change
<p>The City's built environment supports:</p> <ol style="list-style-type: none"> 1. A net reduction in the City's carbon emissions by 2050; 2. More energy efficient buildings; 3. An increase in the use of renewable energy sources; and 4. Healthy functioning of native ecosystems and natural processes. 	
SRCC-02	Strategic City Assets and Infrastructure
<p>Risks from natural hazards are:</p> <ol style="list-style-type: none"> 1. Identified and understood; 2. Planned for through adaptation and mitigation measures to ensure the risks are low; and 3. Avoided where the risks are intolerable. 	

UFD-02	Urban Form and Development																						
<p>Urban development in identified greenfield areas:</p> <ol style="list-style-type: none"> 1. Is environmentally and ecologically sensitive 2. Makes efficient use of land 3. Is well-connected to the public transport network, and 4. Reinforces the City's compact urban form. 																							
UFD-03	Urban Form and Development																						
<p>Medium to high density and assisted housing developments are located in areas that are:</p> <ol style="list-style-type: none"> 1. Connected to the transport network and served by multi-modal transport options; or 2. Within or near a Centre Zone or other area with many employment opportunities; and 3. Served by public open space and other social infrastructure. 																							
UFD-04	Urban Form and Development																						
<p>In order to achieve sufficient, feasible land development capacity to meet expected housing demand, the following housing bottom lines below are to be met or exceeded in the short-medium and long term in Wellington City as contained in the Wellington Regional Housing and Business Capacity Assessment (Housing Update 2022).</p> <table border="1"> <thead> <tr> <th></th> <th>2021-2024</th> <th>2024-2031</th> <th>2031-2051</th> </tr> <tr> <th></th> <th>Short</th> <th>Medium</th> <th>Long</th> </tr> </thead> <tbody> <tr> <td><i>Demand figures</i></td> <td>4, 148</td> <td>8, 426</td> <td>18, 724</td> </tr> <tr> <td><i>Competitiveness margin</i></td> <td colspan="2">20%</td> <td>15%</td> </tr> <tr> <td>Housing bottom line</td> <td colspan="2">15, 089</td> <td>21, 532</td> </tr> </tbody> </table>					2021-2024	2024-2031	2031-2051		Short	Medium	Long	<i>Demand figures</i>	4, 148	8, 426	18, 724	<i>Competitiveness margin</i>	20%		15%	Housing bottom line	15, 089		21, 532
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UFD-06	Urban Form and Development																						
<p>A variety of housing types, sizes and tenures, including assisted housing and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.</p>																							
UFD-07	Urban Form and Development																						
<p>Development supports the creation of a liveable, well-functioning urban environment that enables all people and communities to provide for their social, economic, environmental, and cultural wellbeing, and:</p> <ol style="list-style-type: none"> 1. Is accessible and well-designed; 2. Supports sustainable travel choices, including active and micromobility modes; 3. Is serviced by the necessary infrastructure appropriate to the intensity, scale and function of the development and urban environment; 4. Is socially inclusive; 5. Is ecologically sensitive; 6. Is respectful of the City's historic heritage; 7. Provides for community well-being; and 8. Is adaptable over time and responsive to its evolving, more intensive surrounding context. 																							

An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management ‘means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment’.

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

4.1 Section 6

The s6 matters relevant to this topic are:

Table 3: Relevant Section 6 matters

Section	Relevant Matter
6 (c)	<p><i>The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</i></p> <p>The Proposed Plan identifies SNAs in the Development Areas, and development will need to be considered and located in response to these identified areas.</p>
6 (h)	<p><i>The management of significant risks from natural hazards</i></p> <p>Hazards identified within the Development Areas are restricted to flood overlays, but development will need to be responsive to local hazards.</p>

4.2 Section 7

The s7 matters that are relevant to this topic are:

Table 4: Relevant Section 7 matters

Section	Relevant Matter
7(b)	<i>The efficient use and development of natural and physical resources</i>

	Greenfield development is a response to the need for more housing in the region. It has associated negative impacts which can only be justified by using the natural and physical resources it impacts efficiently.
7 (b)(a)	<i>The efficiency of the end use of energy.</i> Development and built form are a major determinant of the efficiency and end use of energy and will be a key consideration for any new development.
7(c)	<i>the maintenance and enhancement of amenity values</i> The FUZ and Development Areas will enable residential areas and other complimentary land uses such as open space which typically feature amenity values that are appreciated by the community and contribute to their desirability as places to live.
7(f)	<i>Maintenance and enhancement of the quality of the environment</i> Greenfield development has associated impacts on the environment, these can be positive and negative. While greenfield development usually means a lot of change for the environment, it also offers opportunity for improvements.

4.3 Section 8

Partnership and participation are the key principles that have been taken into account in developing the topic provisions. An investigation by Raikura Consultants Ltd. of Upper Stebbings and Glenside West showed that the area had little historical or cultural significance for mana whenua. This was confirmed and the same was found for Lincolnshire Farm area by engagement with Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira.

Ngāti Toa Rangatira indicated interest in potentially using the FUZ for part of their land that is rented to the Department of Corrections, however this option was not chosen at this time.

The draft District Plan chapters were presented to mana whenua as part of the plan making process. No specific comments were received in relation to these future urban and Development Area chapters.

4.4 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act

The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021² has introduced new requirements for Councils in relation to the permitted scale and form of future residential development. The primary purpose of the amendment is to unlock the development of more housing within New Zealand's growing cities.

Section 77F of the Act requires that Councils amend their District Plans to insert a prescribed set of Medium Density Residential Standards (MDRS) in every relevant residential zone, and

² The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 was passed into law on 20 December 2021.

that the Council gives effect to Policy 3 of the NPS-UD within these areas. The Proposed Plan includes these requirements in the Medium Density and High Density Residential Zone chapters.

Section 77G of the Act allows Councils to impose fewer enabling standards in these zones where 'qualifying matters' apply. This is the same approach as that provided for under the NPS-UD (Subpart 6, clause 3.33). Section 77H of the Act then specifies the requirements for assessing qualifying matters.

As the FUZ is not considered a relevant residential zone the MDRS do not apply, however the relevant MDRS requirements have been incorporated into both Development Areas. Before this Act was passed medium density development was proposed in both Development Areas, with Lincolnshire Farm also containing general residential zoning.

As the Proposed Plan no longer contains any general residential zoning in response to the introduction of the Amendment Act, the Lincolnshire Farm Development Plan has been amended to only include Medium Density Residential Zoning and associated standards.

4.5 National Direction

4.5.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Freshwater Management 2020
- NPS on Urban Development 2020
- NPS for Renewable Electricity Generation 2011
- New Zealand Coastal Policy Statement 2010
- NPS for Electricity Transmission 2008

The instruments and associated provisions relevant to this topic are:

Table 5: Relevant NPS objectives and policies

NPS	Relevant Objectives / Policies
National Policy Statement for Freshwater Management 2020 (NPS-FM)	<p>The NPS-FM includes requirements for the management of freshwater resources. Whilst these requirements are largely targeted at Regional Authorities where the management of freshwater quality and quantity is directed under the RMA, the below policies are of relevant consideration through this topic as they include the consideration of land use and development on freshwater.</p> <ul style="list-style-type: none"> • Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments. • Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted. • Policy 7: The loss of river extent and values is avoided to the extent practicable.

	<ul style="list-style-type: none"> • Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.
<p>National Policy Statement Urban Development 2020 (NPS-UD)</p>	<p>The NPS-UD was gazetted in August 2020 and replaced the NPS-UDC (2016). The policy statement requires that territorial authorities assess their housing and business development capacity for the short, medium and long term. District Plans must be amended to provide for sufficient development capacity to meet the identified housing and business demand.</p> <p>The NPS-UD is of relevance for this chapter as it focuses on the delivery of well-functioning urban environments, which the development of greenfield land will seek to achieve. Enabling greenfield development will help Council meet its requirement under the NPS-UD to provide for sufficient development capacity.</p> <p>Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</p> <p>Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.</p> <p>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:</p> <ul style="list-style-type: none"> (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-serviced by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment <p>Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p> <p>Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p> <p>Objective 6: Local authority decisions on urban development that affect urban environments are:</p> <ul style="list-style-type: none"> (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and

	<p>(c) responsive, particularly in relation to proposals that would supply significant development capacity</p> <p>Objective 8: New Zealand’s urban environments:</p> <p>(a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.</p> <p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>a) have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and</p> <p>b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</p> <p>c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>e) support reductions in greenhouse gas emissions; and f) are resilient to the likely current and future effects of climate change.</p> <p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p> <p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and</p> <p>b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and building heights of least 6 storeys within at least a walkable catchment of the following:</p> <p>(i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and</p> <p>c) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:</p>
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- d) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- e) relative demand for housing and business use in that location.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and
- (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and
- (d) operate in a way that is consistent with iwi participation legislation

Policy 10: Tier 1, 2, and 3 local authorities:

- (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and

	<p>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</p> <p>(c) engage with the development sector to identify significant opportunities for urban development.</p>
<p>National Policy Statement for Electricity Transmission 2008 (NPS-ET)</p>	<p>The NPS-ET recognises the importance of the electricity transmission network and manages adverse effects to ensure the network can operate efficiently and effectively now and in the future. The presence of electricity transmission lines within the Development Areas means that the NPS-ET is a relevant consideration.</p> <p>Objective: To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:</p> <ul style="list-style-type: none"> • managing the adverse environmental effects of the network; and • managing the adverse effects of other activities on the network. <p>Policy 2: In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.</p> <p>Policy 10: In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.</p> <p>Policy 11: Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).</p>

4.5.2 Proposed National Policy Statements

In addition to the five NPSs currently in force, there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

4.5.3 National Environmental Standards

In addition to the NPSs, there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

The following NES and associated provisions relevant to this topic are:

Table 6: Relevant NES regulations

NES	Relevant Regulations
National Environmental Standard for Freshwater 2020 (NES-F)	<p>The NES-F is relevant due to its requirements around rivers, streams and natural wetlands. Specially, the prohibited activity status of earthworks in natural wetlands and the discretionary activity status of reclaiming rivers (including streams). This impacts the areas that can be developed across the Development Areas. The NES-F provisions in relation to culverts are also relevant for Development Areas.</p> <p>Drainage of natural wetlands</p> <p>Clause 52 - Non-complying activities</p> <p>(1) Earthworks outside, but within a 100 m setback from, a natural wetland is a non-complying activity if it—</p> <ul style="list-style-type: none"> (a) results, or is likely to result, in the complete or partial drainage of all or part of a natural wetland; and (b) does not have another status under any of regulations 38 to 51. <p>(2) The taking, use, damming, diversion, or discharge of water outside, but within a 100 m setback from, a natural wetland is a non-complying activity if it—</p> <ul style="list-style-type: none"> (a) results, or is likely to result, in the complete or partial drainage of all or part of a natural wetland; and (b) does not have another status under any of regulations 38 to 51. <p>53 Prohibited activities</p> <p>(1) Earthworks within a natural wetland is a prohibited activity if it—</p> <ul style="list-style-type: none"> (a) results, or is likely to result, in the complete or partial drainage of all or part of a natural wetland; and (b) does not have another status under any of regulations 38 to 51.

(2) The taking, use, damming, diversion, or discharge of water within a natural wetland is a prohibited activity if it—

- (a) results, or is likely to result, in the complete or partial drainage of all or part of a natural wetland; and
- (b) does not have another status under any of regulations 38 to 51.

Other Activities (wetlands)

Clause 54 - Non-complying activities

The following activities are non-complying activities if they do not have another status under this subpart:

- (a) vegetation clearance within, or within a 10 m setback from, a natural wetland;
- (b) earthworks within, or within a 10 m setback from, a natural wetland;
- (c) the taking, use, damming, diversion, or discharge of water within, or within a 100 m setback from, a natural wetland.

Reclamation of Rivers

Clause 57 - Discretionary activities

Reclamation of the bed of any river is a discretionary activity.

Culverts

Clause 70 – Permitted activities

(1) The placement, use, alteration, extension, or reconstruction of a culvert in, on, over, or under the bed of any river or connected area is a permitted activity if it complies with the conditions.

Conditions

(2) The conditions are that—

- (a) the culvert must provide for the same passage of fish upstream and downstream as would exist without the culvert, except as required to carry out the works to place, alter, extend, or reconstruct the culvert; and
- (b) the culvert must be laid parallel to the slope of the bed of the river or connected area; and
- (c) the mean cross-sectional water velocity in the culvert must be no greater than that in all immediately adjoining river reaches; and
- (d) the culvert's width where it intersects with the bed of the river or connected area (s) and the width of the bed at that location (w), both measured in metres, must compare as follows:

(i) where $w \leq 3$, $s \geq 1.3 \times w$:

(ii) where $w > 3$, $s \geq (1.2 \times w) + 0.6$; and

	<p>(e) the culvert must be open-bottomed or its invert must be placed so that at least 25% of the culvert’s diameter is below the level of the bed; and</p> <p>(f) the bed substrate must be present over the full length of the culvert and stable at the flow rate at or below which the water flows for 80% of the time; and</p> <p>(g) the culvert provides for continuity of geomorphic processes (such as the movement of sediment and debris).</p> <p>Clause 71 – Discretionary Activities</p> <p>(1) The placement, use, alteration, extension, or reconstruction of a culvert in, on, over, or under the bed of a river is a discretionary activity if it does not comply with any of the conditions in regulation 70(2).</p> <p>(2) A resource consent granted for the discretionary activity must impose the conditions required by—</p> <p>(a) regulations 62 and 63 (information about structures and passage of fish and about culverts), unless the activity is use; and</p> <p>(b) regulation 69 (monitoring and maintenance).</p>
National Environmental Standards for Electricity Transmission Activities 2009 (NES-ET)	<p>The NES-ET is relevant as present within Development Areas are electricity transmission infrastructure.</p> <p>All of the provisions within the NES-ET are relevant as they provide for the maintenance, upgrading and removal of electricity transmission infrastructure, and manage activities including earthworks and vegetation clearance.</p>

4.5.4 National Planning Standards

The National Planning Standards were introduced in 2019 and they provide a uniformed approach to the structure and format of Plans, as well as improving the consistency within the content of the plans. The National Planning Standards provide for a range of zone options to be included in Part 3 – Area Specific Matters of the District Plan. This includes the FUZ and Development Area overlay, the purpose of which are as follows:

Table 7: National Planning Standards zone options

Zone	Description
Future Urban Zone	Areas suitable for urbanisation in the future and for activities that are compatible with and do not compromise potential future urban use.
Development Area	A Development Area spatially identifies and manages areas where plans such as concept plans, structure plans, outline Development Plans, master plans or growth area plans apply to determine future land use or development. When the associated development is complete, the Development Areas spatial layer is generally removed

	from the plan either through a trigger in the Development Area provisions or at a later plan change.
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4.6 National Guidance Documents

There is no national guidance relevant to this topic.

4.7 Regional Policy and Plans

Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for Development Areas and the FUZ contained in the RPS.

Table 8: Relevant RPS objectives and policies

3.9 Regional form, design and function	
Section	Relevant matters
Objective 22:	<p>A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and:</p> <ul style="list-style-type: none"> • sufficient industrial-based employment locations or capacity to meet the region’s needs; • development and/or management of the Regional Focus Areas identified in the Wellington Regional Strategy; • urban development in existing urban areas, or when beyond urban areas, development that reinforces the region’s existing urban form; • a range of housing (including affordable housing); • integrated public open spaces; • integrated land use and transportation; • improved east-west transport linkages; • efficiently use existing infrastructure (including transport network infrastructure); and • (l) essential social services to meet the region’s needs
Policy 31: Identifying and promoting higher density and mixed use development – M	<p>Policy 31 requires that district plans shall:</p> <ol style="list-style-type: none"> (a) identify key centres suitable for higher density and/or mixed use development; (b) identify locations, with good access to the strategic public transport network, suitable for higher density and/or mixed use development; and (c) include policies, rules and/or methods that encourage higher density and/or mixed use development in and around these centres and locations, <p>so as to maintain and enhance a compact, well designed and sustainable regional form.</p> <p>This includes the Wellington City Northern Growth Management Framework.</p>

<p>Policy 42: Minimising contamination in stormwater from development - R</p>	<p>Policy 42 requires district plans to have particular regard to reducing the adverse effects of stormwater run-off from subdivision and development through limiting run-off and using filtration methods.</p>
<p>Policy 43: Protecting aquatic ecological function of water bodies - R</p>	<p>Policy 43 requires district plans to have particular regard to:</p> <ul style="list-style-type: none"> • maintaining or enhancing the functioning of ecosystems in the water body; • maintaining or enhancing the ecological functions of riparian margins; maintaining natural flow regimes required to support aquatic ecosystem health; • maintaining fish passage; • protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning.
<p>Policy 54: Achieving the region's urban design principles – R</p>	<p>Policy 54 requires district plans to have particular regard to achieving the region's urban design principles. The principles are set out in Appendix 2 to the RPS and include: context, character, choice, connections, creativity, custodianship, and collaboration.</p>
<p>Policy 55: Maintaining a compact, well designed and sustainable regional form – R</p>	<p>Policy 55 requires district plans to have particular regard to whether:</p> <p>(a) the proposed development is the most appropriate option to achieve Objective 22; and</p> <p>(b) the proposed development is consistent with the Council's growth and/or development framework or strategy that describes where and how future urban development should occur in that district; and/or</p> <p>(c) a structure plan has been prepared.</p>
<p>Policy 57: Integrating land use and transportation – R</p>	<p>Policy 57 requires district plans to have particular regard to achieving the key outcomes of the Wellington Regional Land Transport Strategy, including by ensuring new subdivision and development has regard to traffic generation, connectivity, safe and attractive environments, access to strategic public transport network, upgrades.</p>
<p>Policy 58: Co-ordinating land use with development and operation of infrastructure – R</p>	<p>Policy 58 requires district plans to have particular regard to the sequencing and location of new development and subdivision to ensure that it:</p> <p>(a) make efficient and safe use of existing infrastructure capacity; and/or</p> <p>(b) coordinate with the development and operation of new infrastructure</p>
<p>Policy 67: Maintaining and enhancing a compact, well designed and sustainable regional form – R</p>	<p>To maintain and enhance a compact, well designed and sustainable regional form by:</p> <p>(a) implementing the New Zealand Urban Design Protocol;</p> <p>(b) promoting best practice on the location and design of rural residential development;</p> <p>(c) recognising and enhancing the role of the region's open space network;</p>

	<p>(d) encouraging a range of housing types and developments to meet the community's social and economic needs, including affordable housing and improve the health, safety and well-being of the community;</p> <p>(e) implementing the actions in the Wellington Regional Strategy for the Regional Focus Areas; and</p> <p>(f) safeguarding the productive capability of the rural area.</p>
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M = policies which must be implemented in accordance with stated methods in the RPS
R = policies to which particular regard must be had when varying a district plan

Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2022

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative with the exception of those that are subject to unresolved appeal.

The table below identifies the relevant provisions for the FUZ and Development Areas contained in the Regional Freshwater Plan 1999 and the Proposed Natural Resources Plan 2021.

Table 9: Relevant Regional Plan provisions

Regional Freshwater Plan for the Wellington Region 1999	
Section	Relevant matters
4.1	Objectives and policies relate to the protection of the mauri of water bodies, riverbeds, natural character of wetlands, and rivers and their margins, the life supporting capacity of water and aquatic ecosystems, recreation and amenity values and public access. Particularly protection from inappropriate subdivision, use and development. Objectives also provide for people and communities to use and develop freshwater resources to provide for their social, economic, and cultural wellbeing.
Rule 47	Crossing of a stream or river including culverts and bridges is a controlled activity.
Rule 50	Reclamation of beds of rivers is a non-complying activity.
Proposed Natural Resources Plan, appeals version 2022	
Section	Relevant matters
Objectives 1, 2, 3, 4	Objectives to protect and enhance the mauri of freshwater and the intrinsic values of freshwater ecosystems.
3.2 Beneficial use and development	Objectives to ensure water quality and use are appropriate for human health needs and agricultural needs, and that social, economic, cultural and environmental benefits of taking and using water are recognised.
3.2b Natural hazards	Objectives to manage and avoid hazard risk. Hazard risk from natural hazards and adverse effects of climate change are managed to an acceptable level, while inappropriate use and development in high hazard areas is avoided.

Objectives 9, 10	Objectives to maintain recreational values and public access to rivers and natural wetlands.
Objective 15	Objective to recognise kaitiakitanga and have mana whenua actively participate in planning and decision-making in relation to use, development and protection of natural and physical resources.
Objective 17	Natural character of natural wetlands and rivers is preserved.
Policy P15	The use, maintenance and ongoing operation of existing catchment-based flood and erosion risk management activities to manage the hazard risk of flooding to people, property, infrastructure and communities are provided for.
Policies 17, 25, 31, 32, 34, 37	Mauri of fresh water to be sustained, preserve natural character from inappropriate use and development, manage adverse effects on aquatic ecosystem health. Policy 32 sets out process for managing adverse effects. Fish passage ensured. Natural wetland values to be managed to restore their condition and values.
Policies 73, 79	Minimising adverse effects of stormwater discharges, including by using good management practice, source control, water sensitive design, improving existing infrastructure and managing localised adverse effects.
Policy P98	<p>Earthworks, vegetation clearance and plantation forestry harvesting activities that have the potential to result in significant accelerated soil erosion, or to lead to off-site discharges of silt and sediment to surface water bodies, shall use measures, including good management practice, to:</p> <ul style="list-style-type: none"> (a) minimise the risk of accelerated soil erosion, and (b) control silt and sediment runoff, and (c) ensure the site is stabilised and vegetation cover is restored.
Policies 101, 102	Ensuring health of water quality in rivers and wetlands and reducing the loss of rivers and wetlands.
Rule R99	The use of land, and the associated discharge of sediment into water or onto or into land where it may enter water from earthworks up to a total area of 3,000m ² per property per 12 month period is a permitted activity, with conditions.
Rule R48A	<p>The discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority or state highway stormwater network, from:</p> <ul style="list-style-type: none"> (a) a new urban subdivision or new urban development associated with earthworks up to a total area of 3,000m² per property per 12 month period, or (b) a new or redeveloped state highway associated with earthworks up to a total area of 3,000 m², or (c) a new urban subdivision or new urban development, or new or redeveloped state highway in an area where a stormwater management strategy in accordance with Schedule N (stormwater strategy) applies is a permitted activity provided the following condition is met:

	(d) the discharge shall comply with the conditions of Rule R48 except condition R48(c).
Method M12A	<p>Sustainable urban development</p> <p>Wellington Regional Council will work with city and district councils and Kainga Ora – Homes and Communities when they are considering where to provide for future urban growth areas and how to manage development within these areas to provide better integration of functions through strategic spatial planning.</p> <p>As part of that process the Wellington Regional Council will provide input that considers the capacity for, and effects of development, in terms of the life supporting capacity of air, water, soil and ecosystems, and identified sites of significance, and that supports the strategic integration of infrastructure with land use.</p>
Method M19	<p>Water management</p> <p>The Wellington Regional Council will work with city and district councils, water users and industry groups to encourage the efficient use of water.</p>

4.8 Iwi Management Plan(s)

There are no Iwi Management Plans relevant to this topic.

4.9 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

Table 10: Summaries of the relevant plans and strategies to this topic

Plan / Strategy	Organisation	Relevant Provisions
Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021	Wellington City Council	<ul style="list-style-type: none"> The purpose of this document is to set out the strategic direction for integrated land use and transport in Wellington City and replaces the Wellington Urban Growth Plan 2015. The Spatial Plan includes influences for growth, the Visions and Goals for directing growth, and consideration of how proposed growth will be funded and serviced The Spatial Plan identifies opportunity areas for growth and development. Lincolnshire Farm and Upper Stebbings Glenside are identified as opportunity sites for greenfield development, where required infrastructure will be provided or funded by developers through development contributions alongside Council investment.
Te Atakura - First to Zero 2019	Wellington City Council	<ul style="list-style-type: none"> The purpose of this document is a blueprint to make Wellington City a zero-carbon capital (net zero emissions) by 2050.

		<ul style="list-style-type: none"> It identifies target areas for emissions reduction including urban form and transport.
Wellington Regional Growth Framework 2021	Greater Wellington Regional Council in conjunction with the Wellington region territorial authorities, Ministry of Housing and Urban Development	<ul style="list-style-type: none"> The purpose of this document is to describe the long-term vision for how the region will grow, change and respond to key urban development challenges and opportunities. It sets out opportunities and challenges at a regional level in relation to housing, infrastructure, natural hazards and climate change, natural environment, affordable housing choices for Māori, and access to social, education and economic opportunities. Both Lincolnshire Farm and Upper Stebbings are identified in the growth framework as future urban Development Areas.
Wellington Regional Land Transport Plan 2021	Greater Wellington Regional Council	<ul style="list-style-type: none"> This plan is an overarching directive for the whole of the Wellington regional transport network. The plan looks at the network for the next 10 to 30 years and identifies the priority transport projects for the region. The Land Transport Plan takes into account the Wellington Regional Growth Framework and is consistent with the Government Policy Statement on Land Transport. Public transport will be the key investment priority from GWRC for the Wellington district, along with a significant commitment to cycleways projects. The plan identifies a gap in public transport provision connecting Tawa to Johnsonville; also, that the rail network looks likely to reach capacity sooner than expected.
Wellington Regional Public Transport Plan 2021	Greater Wellington Regional Council	<ul style="list-style-type: none"> This plan guides the design and implementation of public transport for the Wellington region from 2021 to 2031. The Strategic Priority for the 2021 Regional Public Transport Plan is an efficient, accessible and low carbon public transport network. Service Delivery Thresholds, including appropriate density and sufficient demand, will be applied to FUZ and Development Areas as necessary to provide for future populations.
Wellington Housing Strategy and Action Plan	Wellington City Council	<ul style="list-style-type: none"> This Action Plan focuses on five key programmes: Planning for Growth, one-stop shop consenting improvements, Our City Housing service, Te Mahana & supporting

		<p>Housing First, and Proactive development for a variety of housing options.</p> <ul style="list-style-type: none"> • The Action Plan supports regulatory foundations for good quality housing, environmentally sustainable homes, and healthy homes standards.
Wellington Regional Housing and Business Development Capacity Assessment 2019	<p>GWRC, WCC, PCC, KCDC, HCC, UHDC</p>	<ul style="list-style-type: none"> • The purpose of this document is to calculate the development capacity in the region to ensure there is sufficient housing and business capacity. This assessment report is required by the NPS-UD 2020 (replacing the requirement by the NPS-UC 2016) • Capacity is assessed based on what is currently enabled within the District Plan, and then how much of that theoretical capacity is actually feasible and realisable. • The 2019 assessment report calculates that capacity in Lincolnshire Farm and Upper Stebbings Glenside is required to meet demand.
Wellington Regional Housing Capacity Assessment Update 2022 (HBA 2022)	<p>GWRC, WCC, PCC, KCDC, HCC, UHDC</p>	<ul style="list-style-type: none"> • This update was undertaken by the relevant territorial authorities in the region and focused exclusively on the housing component of the HBA. • The review included an update on the projected population change for Wellington City and a subsequent assessment on the subsequent housing requirements, and how feasible and realisable the plan enabled theoretical capacity was. • The assessment found that there is an undersupply of realisable residential capacity, and a particular shortage of terrace housing capacity in the long-term. • The greenfield sites are assessed as providing 2,721 additional dwellings, with an expected increase in yield from the sites compared to the 2019 HBA.
Te Whaitua te Whanganui-a-Tara Implementation Programme and Plan	<p>Whanganuia-Tara Whaitua Committee</p>	<ul style="list-style-type: none"> • The committee has put forward recommendations for aiding regional and local authorities in the Wellington region in implementing government regulations for improving water quality. • Significant direction is given to Greater Wellington Regional Council, the Wellington District Plan will need to give effect to the relevant requirements in the Regional Plan

		(for example for three waters management in development areas), once the changes to the Regional Plan are implemented.
Upper Stebbings & Glenside West Concept Masterplan 2020	Wellington City Council	<ul style="list-style-type: none"> • The purpose of this document was to provide an overview of the masterplan to the community for engagement purposes. • The concept masterplan outlines the key features and concepts that are important for the development of the area.
Lincolnshire Farm Structure Plan 2006	Wellington City Council	<ul style="list-style-type: none"> • The Lincolnshire Farm Structure Plan process was undertaken to identify where and how development should be accommodated within the Development Area. • The resulting Structure Plan was then incorporated into the Operative District Plan.

4.10 Spatial Analysis

Both areas, Upper Stebbings/Glenside West and Lincolnshire Farm, have been identified for urban development for over 50 years, in various city growth strategy documents. In 2003, they were identified in the Northern Growth Management Framework and most recently, they have been identified in the Our City Tomorrow: A Spatial Plan for Wellington City in 2021 (Figure 2), and the Wellington Regional Growth Framework 2021.

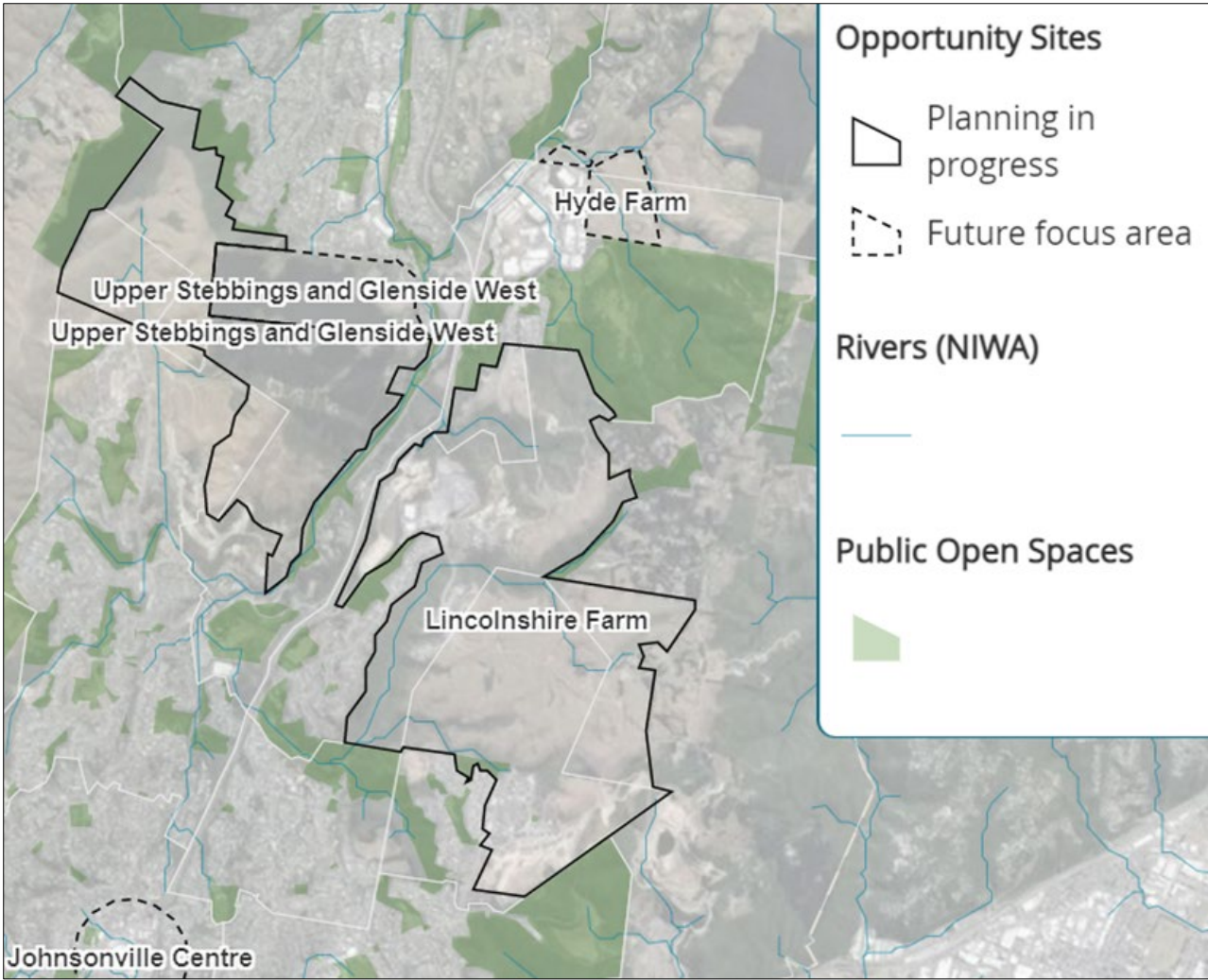


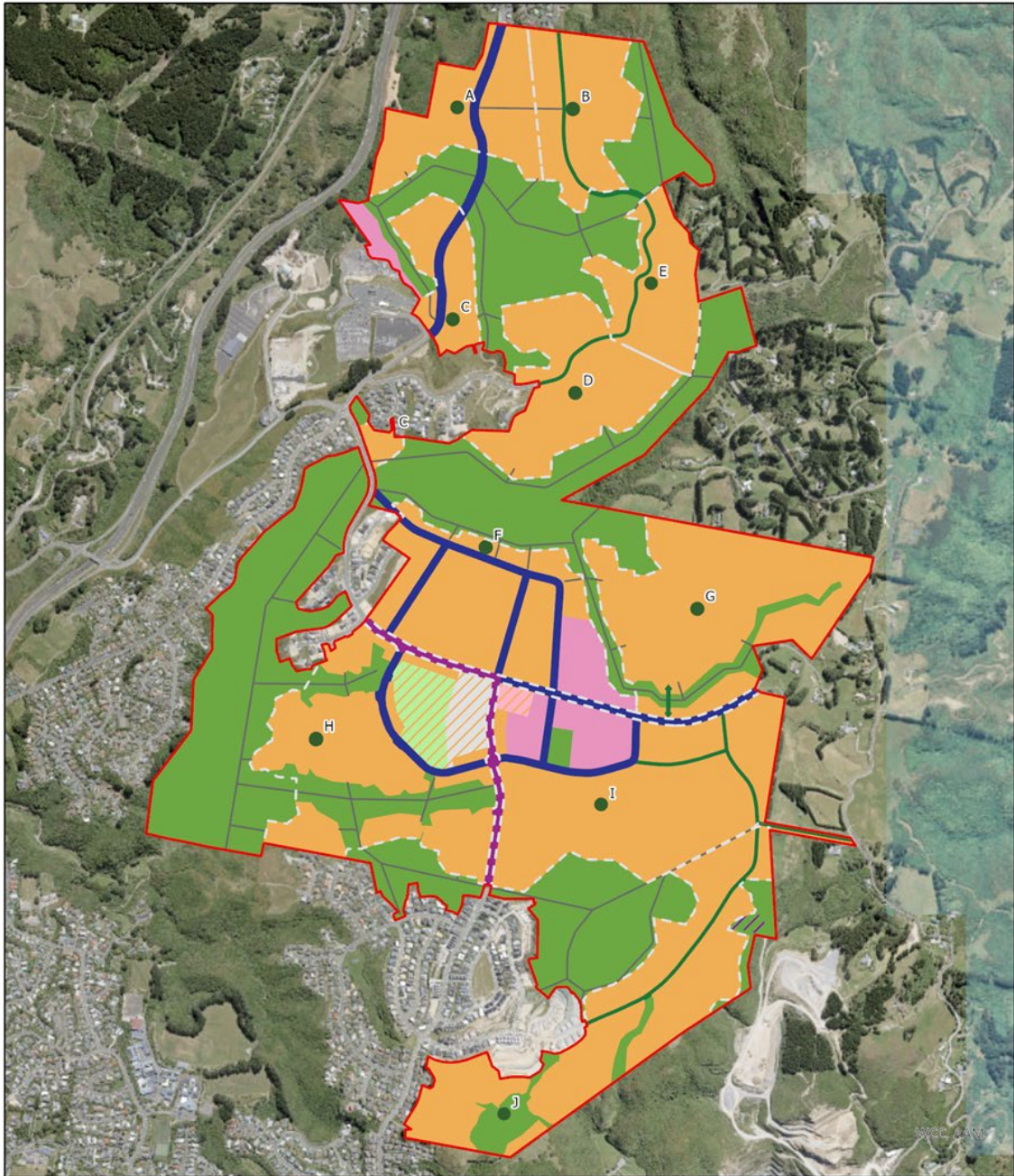
Figure 2. Opportunity Sites as identified in the *Our City Tomorrow: A Spatial Plan for Wellington City 2021*

Upper Stebbings/Glenside West concept engagement design consulted on in 2018 is shown in Figure 3.



Figure 3. Upper Stebbings and Glenside West concept masterplan 2018

A Structure Plan for the Lincolnshire Farm Development Area was developed in 2006 and included in the District Plan. A review of the Structure Plan was completed by The Property Group on behalf of Wellington City Council as part of the Council's Planning for Growth programme of work. In response to this the Masterplan was reviewed and changes made. Figure 4 shows the Development Plan as included in the Proposed Plan.



Lincolnshire Farm

- | | |
|--|--------------------------|
| Development area boundary | General industrial |
| Neighbourhood park catchment | Key local road |
| Potential connection | Natural open space |
| Walking track | Neighbourhood centre |
| Medium density residential | Neighbourhood park |
| Clean fill | Principal road |
| Collector road | School and community hub |
| Community sports and active recreation | |

Figure 4. Lincolnshire Farm masterplan 2022

4.11 Other relevant legislation or regulations

There is no other relevant legislation or regulations relevant to this topic.

5.0 Resource Management Issues Analysis

5.1 Background

Housing supply and housing choice

Council is required by the NPS-UD to identify housing and business demand and enable development to meet that demand through District Plan provisions and other regulatory and non-regulatory methods. The most recent assessment was the 2022 HBA update. This assessment identified that currently there is a shortfall of 10,222 dwellings to meet the projected population growth.

As well as capacity constraints there is currently a lack of housing diversity within suburbs in Wellington, creating limited choice of housing types. There is a lack of variety of dwelling types and sizes, particularly in outer suburbs and in recent greenfield Development Areas. This lack of diversity has subsequent social effects for people who are unable to acquire housing which meets their needs, as well as being ineffective at providing for affordable housing and addressing market inequalities.

Due to the constrained housing capacity and lack of housing diversity, new development needs to be efficient and effective at delivering on a range of housing typologies. The FUZ needs to supply a diverse range of housing to provide choice for people who move into the area.

Efficient Land Use

Greenfield development in Wellington has often followed a pattern of large lot sizes and large standalone houses. In line with the Wellington Regional Growth Framework, NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act, the Council is aiming to maximise the development potential of the land to help with the current and future demand for residential houses in the district. This means fitting more houses on less land.

Wellington has limited greenfield sites and therefore ensuring that existing land is used as efficiently as possible is a key priority. The greenfield areas have been modelled to understand how development can be accommodated whilst reflecting local constraints, and their capacity has been included in the HBA 2019 residential and business capacity findings. Future development in these areas needs to be suitably managed to ensure maximum efficiency is achieved whilst managing potential effects and creating well-functioning urban environments. Interim activities also need to be controlled to safeguard greenfield areas for future use.

Without suitable District Plan controls, development within greenfield sites is unlikely to be efficient and cohesive in nature and will not make the most effective use of available land. Interim land use could lead to land fragmentation or incompatible land uses which may also compromise future development capacity.

Provision and timing of social services and infrastructure

In greenfield developments, it is important that open spaces, community services and facilities are provided in a timely manner. These can include public open spaces, reserves, walking tracks, neighbourhood parks, sports fields, land for schools, shops and supermarkets.

Monitoring work has shown that these types of facilities and infrastructure can often be an afterthought in greenfield developments. It might be that land is set aside but not developed for years, leaving new residents without facilities in the interim, or that land is not set aside in the design stage and then is difficult and expensive to source later down the track.

There are also often mismatched expectations between developers, communities and Council about what is to be provided alongside new development. The Operative District Plan does not have certainty or details in the Lincolnshire Farm Structure Plan about the quality, timing or provision of many of these features.

These aspects need to be thought about and designed into the development from the very beginning to ensure that subdivision and earthworks stages accommodate them.

Protection of natural features and landscapes

Both Development Areas have natural features and landscapes such as SNAs and ridgetops to be appropriately incorporated into development. The ridgetops provide a backdrop to surrounding suburbs and contribute to Wellington's unique visual character and amenity, as well as recreation values.

These landscapes have been identified through a landscape study by Boffa Miskell Ltd, building off the existing ridgelines and hilltops overlay in the Operative District Plan. SNAs have been identified through a comprehensive process and are protected under the Ecosystems and Indigenous Biodiversity chapter. The identification and protection of SNAs is an RMA Section 6 and RPS requirement.

Connectivity

It is important that the new urban areas are well connected to surrounding suburbs, key transport routes and public transport options. It is also important that the connectivity within the new development enable people to move around easily without reliance on private vehicles. The connections with public transport and inclusion of active transport options are crucial to achieving the Council's Te Atakura First to Zero policy to reduce carbon emissions.

5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the Operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback (including on the draft District Plan consultation in 2021) to assist with setting the plan framework.

This work has been used to inform the identification and assessment of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Table 11: Summary of research undertaken on this topic

Title	Author	Brief synopsis
<p>Evaluation of the Lincolnshire Farm Structure Plan – 2020-2021</p> <p>Stage one and Stage two</p>	<p>The Property Group Ltd</p>	<p>The Property Group Limited (TPG) was engaged by the Council to undertake an evaluation of the existing Lincolnshire Farm Structure Plan (the Structure Plan) and Urban Development Area (UDA) chapters in Council's District Plan.</p> <p>In February 2020 the first report was completed, titled Stage One: Evaluation of the Structure Plan and UDA District Plan Chapters. It identifies the key issues that were found with the operative provisions. The findings were based on interviews with the resource consents team and the landowners, a review of past resource consents, and a review of the Operative District Plan provisions.</p> <p>In the following report, Stage Two: Opportunities and change, reviews the urban design outcomes in the Structure Plan area and evaluates completed developments. It also aimed to establish objectives and options for planning pathways to improve the District Plan provisions.</p>
<p>Review of Lincolnshire Farm Structure Plan Employment Land – February 2021</p>	<p>Colliers International Research</p>	<p>Colliers was engaged by the Council to investigate how much employment land would be suitable to include in the Lincolnshire Farm Development Area. The operative Structure Plan has 45 hectares set aside however the HBA 2019 indicates that this may no longer reflect the need for employment/industrial land in the city, especially compared with other land use needs such as housing.</p>
<p>Lincolnshire Farm Structure Plan Open Space and Recreation Planning – 26 March 2021</p>	<p>PAOS Ltd</p>	<p>PAOS was engaged by the Council to investigate open space requirements in Lincolnshire Farm.</p> <p>The report outlines why open space and recreation planning is included in the structure plan for Lincolnshire Farm and the key Council strategies, policy and plans that guide this planning. It also outlines existing open space provision and recreational activities, proposed housing types and the expected demographics of Lincolnshire Farm and what this means for future provision of parks and reserves. It identifies different types of parks and reserves and some of the physical features of Lincolnshire Farm that affect open space and recreation planning.</p> <p>It maps existing parks and reserves and reviews the existing reserve network. The final part proposes a Lincolnshire Farm reserve network, reserve distribution, size and indicative locations and connections.</p>

Title	Author	Brief synopsis
Lincolnshire Farm Transport Review – June 2021	Tonkin and Taylor Ltd	Tonkin and Taylor were engaged to review the operative provisions and structure planning in relation to transport. They investigated connectivity and functionality improvements, in particular to align with Council's carbon emission goals. The key suggestions include greater provisions for pedestrians, cyclists and public transport by increasing connectivity and making space in road widths.
Upper Stebbings and Glenside West Development Concept Transport Assessment – 29 October 2020	Tonkin and Taylor Ltd	Tonkin and Taylor were engaged to undertake a high-level review of potential transport impacts of Development Concept scenarios in Upper Stebbings and Glenside West. This report has been prepared to help inform the Council's structure planning process and identify, where appropriate, potential issues, opportunities and local transport infrastructure improvements for consideration prior to development of the area.
Cultural Values Report Upper Stebbings Valley and Marshall Ridge Structure Planning – May 2018	Raukura Consultants	Raukura Consultants in association with Port Nicholson Block Settlement Trust and Wellington Tenths Trust were engaged to provide information on cultural values and related iwi matters for the Upper Stebbings and Glenside west area. The conclusions of the report are that the area of Upper Stebbings Valley and Marshall Ridge (Glenside) has little cultural value to associated iwi however wider impacts such as water should be considered.
Historic Heritage Study for the Upper Stebbings and Marshall Ridge Structure Plan – April 2018	Bay Heritage Consultants	This report provides an analysis of the history of the Upper Stebbings and Glenside West area and provides recommendations regarding identification, protection and promotion of heritage resources.
Upper Stebbings Valley, Wellington Phase One: Landscape and ecology analysis – July 2018	Boffa Miskell	The Council commissioned Boffa Miskell to carry out landscape and ecology investigations and analysis. The focus of the first phase of 2017 work was to review and update the existing base information in relation to landscape, terrestrial ecology, and streams and waterways, and to identify key issues to provide a better understanding of characteristics and attributes of the site. Phase One has involved a review of published and unpublished information, interrogation of existing GIS datasets, and field work both within the project area and also in relation to the wider environs so as to provide an appropriate level of landscape and ecological context.

Title	Author	Brief synopsis
Upper Stebbings and Glenside West Concept Masterplan	Isthmus Group Ltd Orogen Ltd Morphum Environmental Ltd	The Concept Masterplan document summarises the opportunities, public feedback, design principles, water, ecological and landscape features, and masterplan vision for development.

In addition to the commissioned reports listed in the table above, the Council has undertaken the following actions and gathered the following information and advice that is relevant to this topic:

- Monitoring review of resource consents issued within identified greenfield areas (Appendix 1)
- Workshops with WCC resource consent team, urban design team, compliance, and transport team staff about issues and options in Development Areas
- Testing of workability and outcomes of draft provisions using actual subdivision scenarios (completed with GHD Ltd in 2022)
- Workshops with landowners
- Meetings with Greater Wellington Regional Council and Wellington Water
- Meetings/correspondence with Ministry for Education and Waka Kotahi (New Zealand Transport Agency).

5.2.1 *Analysis of Operative Wellington District Plan provisions relevant to this topic*

For the purposes of this report the key provisions in the Operative District Plan of relevance to this topic are summarised below.

Table 12: Analysis of relevant Operative District Plan provisions

Topic	Analysis of relevant provisions
Chapter 4: Residential Areas	<p>This zone chapter has objectives, policies and rules regarding residential activities in Wellington City. Included are provisions that are relevant to the FUZ, such as promoting the efficient use of natural and physical resources in residential areas and controlling greenfield subdivision to have a high amenity standard and integrate with existing and planned infrastructure.</p> <p>One of the methods in use to achieve the relevant provisions in this zone chapter is the Northern Growth Management Framework, which was replaced by the WCC Spatial Plan 2021. The Northern Growth Management Framework highlighted Upper Stebbings and Lincolnshire Farm as future residential areas among others.</p> <p>The approach to managing greenfield development is broad and not tailored at a site-specific level in this chapter.</p>
Chapter 14: Rural Area	<p>This zone chapter has objectives, policies and rules regarding rural activities in Wellington City. The introduction highlights new urban development in rural areas on the edge of the urban extent of the city as a particular resource management issue.</p>

Topic	Analysis of relevant provisions
	<p>The provisions include the management of greenfield subdivisions to ensure that adverse effects are avoided, remedied or mitigated, and that greenfield land development leads to neighbourhoods with high amenity.</p> <p>The Northern Growth Management Framework was the previous strategy for managing this development and is referenced within the chapter's provisions.</p> <p>These provisions are generally broad in their consideration and are not tailored to a site-specific level.</p>
<p>Chapter 27: Urban Development Area</p>	<p>This zone chapter has one objective:</p> <ul style="list-style-type: none"> • To provide for sustainable urban growth in the northern suburbs of the city consistent with the vision, objectives, themes and values of the Northern Growth Management Framework. <p>The objective is implemented by a framework of 14 supporting policies that:</p> <ul style="list-style-type: none"> • Provide for sustainable growth, in terms of residential and employment development. • Provide for rural activities in the transition to urban development. • Provide for rural residential activities. • Encourage diversity and increase density of housing close to neighbourhood and employment areas. • Ensure that neighbourhood centres and mixed use/commercial areas are well integrated. • Ensure that Structure Plans are responsive to physical and ecological context. <p>Rural activities are generally permitted provided they comply with associated standards in the Rural Zone chapter. Residential activities are permitted in limited location as identified on the Structure Plan map. Most areas within the Structure Plan require resource consent.</p> <p>Key activity and building and structure standards include:</p> <ul style="list-style-type: none"> • Being in accordance with the Structure Plan, this means activities must align with the activities outlined in the Structure Plan. • Construction of residential buildings require compliance with the standards in the Outer Residential Zone. • To comply with most rules in the chapter, a detailed Development Plan is required to be submitted with the resource consent application. <p>During the course of reviewing the operative provisions for the purposes of this report several key issues were identified:</p> <p>Review of the Development Area chapters necessary</p> <ul style="list-style-type: none"> • Chapter 27 provides the context, objectives and policies for greenfield development. It was expected that when new structure plans were adopted then there would need to be a plan change to incorporate the new rules into Chapter 28. Given the

Topic	Analysis of relevant provisions
	<p>Glenside/Upper Stebbings development is to be incorporated into the District Plan, the chapters require review.</p> <p>Balance between flexibility and certainty not achieved</p> <ul style="list-style-type: none"> • The balance between flexibility and certainty for urban Development Areas has not been achieved through the current District Plan. There is not enough flexibility for the developer to implement designs that might result in better design outcomes but that may be inconsistent with the maps of the Structure Plan. • The current Structure Plan is not striking the right balance between employment and residential land. Current size of 'employment area' in Lincolnshire Farm does not match anticipated needs for housing and business supply. <p>Rules resulting in non-complying activity status for consents</p> <ul style="list-style-type: none"> • 41 percent of resource consents are processed as non-complying. The rules in Chapter 28 require a "detailed Development Plan addressing the matters as specified by the structure plan" to be submitted with any application for subdivision or residential development. The intention behind this provision was to encourage applications for large scale developments. This would allow processing planners to assess the effects of the development as a whole and ensure it would be adequately serviced and achieve the outcomes specified in the Structure Plan. If a detailed Development Plan is not submitted with the application, it automatically makes it a non-complying activity. Given the broad nature of the objectives and policies, it is not difficult for applications to pass this test and subsequently be granted. <p>Gap in provisions for permitted activities resulting in onerous process</p> <ul style="list-style-type: none"> • The provisions do not provide for any permitted activities aside from in limited areas in the Woodridge area. As noted in the TPG report, Rule 28.1.2 appears to permit residential activities including construction and additions and alterations in a small part of the Structure Plan area (being RA09, RA10 and RA11), as long as they comply with Outer Residential zone standards. However, Rule 28.3.3 then requires resource consent as a restricted discretionary activity for any residential activities including the construction, alteration or addition to dwellings. This means that if a dwelling has been consented and constructed, no alterations or additions can be made without a resource consent. The result is a process more onerous than the rest of the plan. For example, additions and alterations and even construction of a dwelling are permitted activities in the current Outer Residential zone, as long as there is compliance with the related standards.

Topic	Analysis of relevant provisions
	<ul style="list-style-type: none"> • The onerous process has been compounded by the practice of adding consent notices to many residential resource consents. This means for many applications, they not only need to apply for resource consent under the District Plan rules but also need to apply for a change or cancellation of a consent notice. <p>Development completed in parts of Structure Plan area – boundary area review required</p> <ul style="list-style-type: none"> • Some parts of the structure plan area have been subdivided and dwellings constructed. These areas now have the same attributes as the surrounding Outer Residential zone (to be General Residential zone) and should be rezoned appropriately. In particular, there is the area around Woodridge, Grenada Drive, and Havana Rise where there are pockets of completed development. <p>Compliance with NPS-UD 2020 and MDRS 2021</p> <ul style="list-style-type: none"> • To give effect to the NPS-UD and the MDRS, a review of the rules and standards is required to ensure that they enable as much residential capacity as possible and are consistent with the buildings standards required in all residential zones.

5.2.2 Analysis of other District Plan provisions relevant to this topic

Current practice has been considered in respect of this topic, with a review undertaken of the following District Plans. Given the localised nature of this topic, there is a large variation in the way councils approach greenfield Development Planning. This is influenced by local environmental factors, key stakeholders involved, council processes, size, and timeframes. It is also noted that some councils have not implemented the National Planning Standards.

Table 13: Analysis of other District Plan provisions relevant to this topic

Plan	Local Authority	Description of approach
Porirua City Proposed District Plan – Future Urban Zone Proposed District Plan (poriruacity.govt.nz)	Porirua City Council	<p>The Porirua PDP uses the FUZ to regulate greenfield development using structure plans. Rural-lifestyle activities, ad hoc urban development, non-farming related, and commercial activities are discouraged in the FUZ. The provisions look to maintain the land’s character, amenity and productive capability prior to structure planning and development.</p> <ul style="list-style-type: none"> • Three objectives and six policies • Includes 27 rules, with more permitted activities than the Wellington chapter • Seven standards regarding height, scale, and other activities • Developed under the National Planning Standards, currently in hearings stage

Plan	Local Authority	Description of approach
		<ul style="list-style-type: none"> Zone applies to three areas at the edge of Porirua City.
New Plymouth Proposed District Plan – Future Urban Zone	New Plymouth District Council	<p>The New Plymouth PDP sets out that the FUZ is land that is suitable for urbanisation in future, at which time it will be appropriately rezoned. In the meantime, the primary use for the FUZ land is agricultural, pastoral and horticultural. Structure plans and Development Areas are also used to regulate more imminent areas of urbanisation. Overall, the provisions seek to ensure the activities occurring in the FUZ are compatible and do not compromise future urban uses.</p> <ul style="list-style-type: none"> Four objectives and seven policies Includes 31 rules, with 10 permitted or controlled activities, four discretionary or restricted discretionary activities, and 13 non-complying activities. Seven standards regarding height, setbacks, fencing and scale of activities. Developed under the National Planning Standards, currently in hearings stage. Zone applied at various scales at edge of New Plymouth City and in two satellite towns, Waitara and Ōakura.
Auckland Unitary Plan - Future Urban Zone	Auckland Council	<p>The Auckland Unitary Plan identifies land suitable for urbanisation as the FUZ, a 'transitional' zone that utilises Structure Plans and plan changes to facilitate new urbanisation sites. Land is used to achieve the objectives of Rural Production Zone until it is rezoned for urbanisation.</p> <ul style="list-style-type: none"> Four objectives and six policies Includes 69 rules FUZ areas are focused in the north and south of the city around existing local centres, including Papakura, Pukekohe, Hobsonville and Silverdale.
Hamilton City Operative District Plan - Future Urban Zone	Hamilton City Council	<p>For the Hamilton City Operative District Plan (HCODP), the FUZ controls land that could be potential urban Development Areas in the long-term. A key purpose for the FUZ is to protect the land from fragmentation. Structure Plans are identified in a separate chapter of the HCODP. Land use remains predominantly rural under the FUZ.</p> <ul style="list-style-type: none"> Three objectives and 16 corresponding policies

Plan	Local Authority	Description of approach
		<ul style="list-style-type: none"> • Includes 18 rules, 13 of which are Permitted activities, with Intensive farming being the only Non-Complying activity. • FUZ areas are focused in the north and south of the city around existing local centres, including Papakura, Pukekohe, Hobsonville and Silverdale.

A summary of the key findings follows:

- Some councils (such as Porirua and Auckland) use the FUZ (or similar) as a ‘holding zone’ to enable continued rural use but to restrict any activities or development until a plan change which would introduce zoning changes for the area after a structure plan or master plan is completed.
- New Plymouth, which has implemented the National Planning Standards, has used them in a similar way to what is proposed within this Wellington Proposed Plan. Using the Development Area overlay to house special provisions for each greenfield area, albeit in conjunction with a residential zone instead of the FUZ.
- Many councils use structure plans or master plans to provide comprehensive, coordinated direction for development. These can be located within the district plan or as supporting documents outside the district plan.
- Although some councils (such as Hamilton) leave the FUZ land for predominantly rural purposes prior to potential rezoning, intensive rural activities are more restricted, signifying an incompatible activity with the potential future use.

5.2.3 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA, local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this, s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.
-

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

No specific advice has been received from Taranaki Whānui and Ngāti Toa.

5.2.4 Consultation undertaken to date

The following is a summary of the primary consultation undertaken in respect of this topic:

Table 14: Summary of consultation undertaken to date relating to this topic

Who	What	When	Relevant Issues Raised
General Public	Feedback on Upper Stebbings Glenside West Concept Masterplan	November 2020	<ul style="list-style-type: none"> • Common themes included the need for more public transport services, specific concerns about local roading network, prioritisation of pedestrian and cyclists, concern about the development increasing car dependency.
Local community groups and boards	Meetings on Upper Stebbings Glenside West Draft Plan	Intermittent meetings mid-2020 to mid-2021	<ul style="list-style-type: none"> • Common themes included the need for more public transport services, specific concerns about local roading network, prioritisation of pedestrian and cyclists, concern about the development increasing car dependency, connections between Tawa and Upper Stebbings.
Councillors	Draft Plan workshops	July 2021	<ul style="list-style-type: none"> • The need for medium density to be enabled as much as possible.

Who	What	When	Relevant Issues Raised
			<ul style="list-style-type: none"> • Possibilities for greenfield growth elsewhere. • Opportunities for commercial activities in Upper Stebbings. • Need a cycleway connection between Tawa and Upper Stebbings.
Landowners	Draft Plan meetings	Intermittent meetings between October 2020 - November 2021	<ul style="list-style-type: none"> • Raised issues similar to those raised in TPG report. • Find Operative District Plan to be overly stringent, everything needs consent. • Has found the structure plan to be rigid and not interpreted flexibly. • Rules are complex and it takes new Council planners time to understand and approach rules. • Concern about the NPS-FM and Greater Wellington Regional Council's approach on consenting within the new framework. • Willing to build medium density development but doubts about market for developments that are not standalone. • Feedback on draft Development Plan to make some minor boundary adjustments.
Greater Wellington Regional Council	Meetings and feedback on Draft District Plan	30 July 2021 20 August 2021 13 September 2021 29 September 2021	<ul style="list-style-type: none"> • Tension between NPS-FM and NPS-UD • Shift in approach to developing around streams. • Approach to offsetting stream effects. • Importance of identifying a functional need.
Feedback on Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for	Submissions on Draft Spatial Plan	10 August to 5 October 2020	<ul style="list-style-type: none"> • Submitters on the draft Spatial Plan advocated for more greenfield developments, whilst some submitters opposed urban sprawl.

Who	What	When	Relevant Issues Raised
Wellington City 2021			<ul style="list-style-type: none"> • 62% of submitters supported developing the Upper Stebbings and Glenside West area. • 57% of submitters supported a review of the Lincolnshire Farm Structure Plan to allow for more housing typologies and greater density.
Feedback on Draft District Plan	Feedback on Draft District Plan, through submission points (2400+) and targeted discussions	2 November to 14 December 2021	<ul style="list-style-type: none"> • Concerns connections, access to adjacent suburbs. • Concerns about transport access and provision • Concerns about maintaining compact development • Want protection for ridgetops/topography • General support for Development Areas • Concern over effect from mass earthworks resulting from development • Minor fixes to Development Plans • Support for objectives

A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in Appendix 2, including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

In summary, the key findings arising from the consultation undertaken on this topic are:

- Enabling housing and business capacity to meet identified needs within Development Areas is supported by landowners and largely by the general public, with no strong objecting submissions received on the Draft District Plan in relation to the principle of greenfield development.
- How the tension between the NPS Freshwater and the NPS-UD will be addressed.
- The earthworks and subdivision stages are essential to get right for well-functioning urban neighbourhoods, as is the timing of the delivery of supporting community facilities such as open space.
- Connectivity for the Development Areas is very important, including to public transport and surrounding road network, with some submissions seeking improved connections for the Upper Stebbings and Glenside West Development Area.
- Protecting the ridgetops from development and inappropriate earthworks within the Upper Stebbings and Glenside West Development Area.

5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Table 15: Summary of relevant resource management issues

Issue	Comment	Response
<p>Issue 1: Constrained housing and business supply and development capacity in established urban areas to meet projected growth and to offer a choice of housing type, location and price point.</p>	<p>The HBA 2022 has taken into account greenfield development in the assessment of housing and business capacity in Wellington city for next 30 years. These Development Areas provide an important contribution to housing capacity.</p> <p>Greenfield development provides more opportunities for different types of housing to be provided, such as larger family homes. There is a need for a variety of housing types in every suburb so smaller units in these areas must also be encouraged.</p>	<ul style="list-style-type: none"> • Increase development capacity within the Lincolnshire Farm by 'upzoning' areas. Rezone Upper Stebbings/Glenside West area as FUZ with associated Development Area overlay. • Include policies that encourage mix of housing types and sizes and higher densities. Use of the FUZ to anticipate Development Areas. • Require a minimum density per hectare of site area for some parts of Lincolnshire Farm around the neighbourhood centre. • Use methods such as structure plans to ensure efficient use of greenfield land. • Retain business and employment opportunities in Lincolnshire Farm.
<p>Issue 2: Inefficient use of land in identified greenfield growth areas resulting in reduced residential and business development capacity.</p>	<p>Feedback from the public on the Draft Spatial Plan and the Draft District Plan noted the proposed urban opportunity areas (Lincolnshire Farm and Upper Stebbings/Glenside) should be used efficiently. That is, the greenfield area should not be developed at low housing densities as it would be an inefficient use of land and not worth the potential adverse ecological, visual and infrastructure effects.</p>	<ul style="list-style-type: none"> • Use the medium density residential standards to ensure a range of dwelling options across development sites. • Use different density standards for different areas to create 'medium density' and 'general residential' areas. • Include policies that promote efficient use of land. • Include a minimum density standard in identified

Issue	Comment	Response
	<p>With the current constrained housing market as discussed in Issue 1 above, there is a need to ensure greenfield land is developed at higher densities than is traditional.</p> <p>Efficient land use also relies on having sufficient infrastructure capacity to meet the of a certain number of dwellings and people. This includes roads, pipes, public transport, and community services such as parks and community hub viable.</p> <p>Employment land is required in the Lincolnshire Farm area because there is a regional need for more industrial type land. It will also provide local employment opportunities for the new community which will have economic and environmental benefits, e.g., by not having to commute across town to work.</p>	<p>residential areas to ensure adequate supply of housing.</p> <ul style="list-style-type: none"> Require Development Plans for Development Areas to ensure that greenfield sites are developed efficiently and cohesively.
<p>Issue 3: Excessively onerous process for new activities and buildings contradicts the objectives of the zone and Development Areas.</p>	<p>Operative provisions do not permit any activities (except rural and residential activities and buildings in small specific area). Resource consent is therefore required for any other activity or building. This has the effect of discouraging certain activities and development that are anticipated and encouraged in the Development Areas.</p> <p>The current provisions also make it difficult for new residents within the Development Areas to make alterations or additions to their property.</p>	<ul style="list-style-type: none"> Include objectives and policies that set out anticipated (and encouraged) activities within the Development Areas. Provide for a range of permitted activities, specifically residential activities and buildings in the identified residential areas.
<p>Issue 4: Topographically challenging landscape requiring earthworks that could result in:</p>	<p>Areas earmarked for greenfield development in Wellington City often require significant earthworks to create a suitable topography</p>	<ul style="list-style-type: none"> Continue to incorporate matters of discretion into earthworks rules that consider open spaces needs and urban design and amenity outcomes.

Issue	Comment	Response
<p>(a) Land instability</p> <p>(b) Erosion, sediment and dust.</p> <p>(c) Visual and landscape value reduction</p> <p>(d) Vegetation removal</p> <p>(e) Alteration to rivers, streams and stormwater runoff patterns.</p> <p>(f) Potential flooding</p>	<p>for roads and building platforms.</p> <p>These earthworks are potentially being undertaken prior to detailed design and consent has occurred for the subdivision and building stages. This results in poor allocation of space for open space and pedestrian access.</p> <p>Part of the cause of this issue is lack of specificity in requirements for neighbourhood parks and connectivity. These need to be considered at the earthworks stage of the development.</p> <p>Earthworks should accommodate the natural form as much as possible, to mitigate visual and ecological effects.</p> <p>It is also crucial that earthworks are undertaken to appropriate engineering standards to ensure stability.</p>	<ul style="list-style-type: none"> • Policies to direct key considerations for initial earthworks stages. • Include specifications for connectivity and provision of open space. • Identify areas of higher landscape or natural value and limit earthworks in these areas. • Code of Practice review.
<p>Issue 5:</p> <p>Rezoning at Development Area end of life</p>	<p>Special provisions regarding Development Area/FUZ requirements are no longer necessary after a certain point. This point is not currently specified.</p> <p>Land will need to be re-zoned to multiple different zones, which will be complicated and could compromise the flexibility for development as it occurs.</p>	<ul style="list-style-type: none"> • Use an RMA Schedule 1 process to undertake a full re-zoning plan change at the appropriate time (after development pattern is confirmed).
<p>Issue 6:</p> <p>Uncoordinated planning and development resulting in:</p> <p>(a) poor community cohesion</p> <p>(b) reduced internal physical and social connectedness</p>	<p>Without an overarching strategic vision for the new urban areas, it is difficult for the Council to ensure that positive outcomes are achieved at each stage of development.</p> <p>There is increased risk that important features and infrastructure will not be</p>	<ul style="list-style-type: none"> • Review of Lincolnshire Farm Structure Plan and introduction of Upper Stebbings Glenside West Development Area. • Targeted policies to establish what is expected within the Development Area.

Issue	Comment	Response
<p>within the Development Area and opportunities to connect with adjoining neighbourhoods and networks</p> <p>(c) random provision and sequencing of infrastructure, open space and community and recreational facilities</p> <p>(d) diminished location options to accommodate future community and business needs (e.g. school site/shops and services), including provision of local/regional employment opportunities on resilient business land</p> <p>(e) poor integration with key infrastructure (e.g. Transpower transmission lines)</p> <p>(f) unintended reverse sensitivity impacts (e.g. location of residential/business activities)</p> <p>(g) greater dependence on private motor vehicle usage and increased CO² emissions</p> <p>(h) poor integration with and potential deterioration of identified ecological and landscape features/ elements</p>	<p>delivered or that they will not be coordinated in an efficient and successful way.</p> <p>This can result in the creation of new neighbourhoods which do not meet the requirements for well-functioning urban environments and can have limited positive effects on social health and wellbeing for residents.</p>	<ul style="list-style-type: none"> • Rules, standards and requirements that are specific about the outcomes that need to be achieved and what outcomes are acceptable. • Some of these aspects will be covered by other chapters such as infrastructure and code of practice. • Restrict development until a Development Plan has been established which can ensure that cohesive development is achieved.

Issue	Comment	Response
(e.g. ridgelines and hilltops)		
Issue 7: Limited capacity of the wider road network to meet future demand.	Need to provide for public transport and alternative active transport modes, e.g., pedestrians and cyclists. This will provide for multi-modal opportunities with positive health and wellbeing effects for residents.	<ul style="list-style-type: none"> • Requirements included in appendices to Development Areas requiring bus stops to be put in when roads are built. • The Development Plans will enable effective spatial planning that can integrate alternative transport options.
Issue 8: Incoherent subdivision layout and urban design resulting in poor streetscape and townscape outcomes.	Subdivision is a key stage of greenfield development and sets out the quality of urban form, connectedness and liveability. If key objectives for the neighbourhood are not considered at the subdivision stage, then there is very little that can be done after to increase key aspects such as connectivity, mixed housing types, community cohesion, safe streets and successful transport modes.	<ul style="list-style-type: none"> • Include policies targeted at subdivision stage of development. • Require assessment of new subdivision against subdivision design guide.

6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e., objectives, policies and rules) relative to a series of key criteria.

Based on this, the scale and significance of anticipated effects associated with this proposal are identified below:

Table 16: Evaluation of scale and significance of the proposed chapter

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change		✓		<ul style="list-style-type: none"> • Change is needed to enable additional housing supply in the City. • The District Plan needs to manage greenfield sites to ensure efficient and cohesive development is integrated into the existing urban form. • This approach aligns with the National Planning Standards and NPS-UD 2020. • The change also implements the non-statutory <i>Our City Tomorrow: He Mahere Mokowā mō Pōneke, A Spatial Plan for Wellington City</i>, and the non-statutory <i>Wellington Regional Growth Framework</i>.
Addresses a resource management issue		✓		<ul style="list-style-type: none"> • The proposed approach for identified sites addresses resource management issues including efficient use of land, providing for a mix of housing typologies, and creating well connected urban environment. • This approach will facilitate the urbanisation of Upper Stebbings and Glenside West, which is consistent with the relevant land use and growth strategies. • The required adoption of Development Plans for the Development Areas also allows for specific consideration of relevant resource management issues at a greenfield site level, including earthworks, ecology, natural hazards, three waters and transport.
Lincolnshire Farm - degree of shift from the status quo		✓		<ul style="list-style-type: none"> • The Operative District Plan already identifies some greenfield areas for development, either directly or through reference to the Northern Growth Management Framework. • The Plan also includes policies to require a Structure Plan before development is undertaken in greenfield areas. As such the proposed approach is not a significant change from the current setting, although it is acknowledged that the inclusion of the Development Plans is a shift from the current status of the greenfield sites within the Operative District Plan.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				<ul style="list-style-type: none"> Direction of objectives and policies remains very similar to Operative District Plan.
Upper Stebbings and Glenside West - degree of shift from the status quo			✓	<ul style="list-style-type: none"> There is a significant shift from the status quo in terms of rezoning Upper Stebbings and Glenside West from rural to FUZ. The approach to enabling and managing development is similar to Lincolnshire Farm with an important requirement to give effect to a Development Plan.
Who and how many will be affected/ geographical scale of effect/s		✓		<ul style="list-style-type: none"> The FUZ and Development Plans are geographically localised, which will limit the extent of effects to a degree, and do not affect a significant number of private property owners as currently zoned. The enabled development will have a range of effects on surrounding communities, but in respect to the overall size of the Plan area this will still be well-contained Positive effects are also considered including providing for a mixed housing typology, providing local services, and promoting efficient land use. The Development Plans have been through community consultation phases during their development, and it is noted that limited feedback was received on the FUZ and Development Areas during the Draft Plan consultation.
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> The geographical area is not of special interest to iwi and does not have any strong ties to historic use. No feedback was received from iwi on these areas or topics during the consultation in preparing the Proposed Plan.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> Due to the scale of the development proposed in the Development Plans and the uncertainty on timescales for the realisation of the Development Plan schemes, the proposal is likely to have effects in the short, medium and long term. These effects are considered to shift from short term adverse effects during construction

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				to long term positive effects through the creation of well-functioning urban environments.
Type of effect/s		✓		<ul style="list-style-type: none"> • The development enabled through the Development Plans is considered to be wide-ranging but include both positive and negative effects. • Associated construction effects are expected in the short and medium term. Both identified Development Areas are considered to have the potential for negative effects in the short to medium term on visual amenity, transport, infrastructure, and ecosystems, with the potential for cumulative effects. These effects will decrease in the longer term when the construction phase has been completed. • It is noted that the Development Areas have tailored provision frameworks which will manage the effects of the development, and the Development Plan mapping has allowed for the spatial consideration of how development can be accommodated in response to site specific constraints. • The Development Plans will also result in positive effects. This includes providing for new housing development which will allow for a provision of a mix of housing typologies. • The Lincolnshire Farm Development Plan will provide for local employment opportunities through the inclusion of business land provision, which will have positive economic and social effects for the area. • As mentioned above, effects will shift from negative in the short term to positive in the long term.
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> • There is considered to be a low level of risk and uncertainty for the zone and Development Areas. The use of Development Plans to manage large scale development at greenfield sites, is an established practice, and the approach aligns with the National Planning Standards approach. • Furthermore, the Development Plans have been developed through community

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				consultation such that there is a well-established expectation for these areas.

Overall, the scale and significance of the proposed provisions are considered to be medium for the following reasons:

- The zoning approach and inclusion of Development Plans to control greenfield development is in line with the National Planning Standards approach and is not a significant change from the current approach to greenfield development in the Operative District Plan.
- The approach addresses resource management issues including housing and business land provision and efficient use of greenfield land.
- The geographical extent of effects is considered to be limited based on the FUZ and Development Areas comprising only a small area and affecting a limited number of people.
- The timescale of effects of delivery of the development proposed in the Development Plans is considered to be between short, medium and long term due to a level of uncertainty on timing for development to be progressed.
- The type of effects are considered to be wide due to the scale of development that could occur within the identified greenfield sites. However identified effects are both positive and negative effects, and effects are able to be managed at a site specific level through the integrated Development Plans and consenting processes.
- The approach is considered to be of low risk and low uncertainty.

Consequently, a high-level evaluation of these provisions has been identified as appropriate for the purposes of this report.

6.2 Quantification of Benefits and Costs

Section 32(2)(b) of the RMA requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Based on the assessment of the scale and significance of the proposed provisions in section 6.1, specific quantification of the benefits and costs in this report is considered neither necessary, beneficial nor practicable in relation to this topic for the following reasons:

- The approach to managing greenfield areas is well established in the Operative District Plan and the proposed approach is not significantly different but is expected to result in improved management for greenfield areas as they transition from rural to urban land use.
- The Development Plans for the Development Areas have undergone multiple stages of public consultation and engagement, as well as being supported by several relevant assessments such that the development of these greenfield areas is well supported, and the effects well understood.
- The Wellington City Council Housing Capacity Assessment Review has included assessments on the proposed greenfield area with a qualitative aspect that assessed the capacity, feasibility, and realisability of the identified greenfield areas.

- There is a low level of risk and uncertainty, and the proposal is not resulting in a significantly more restrictive regime than the status quo.
- The overall costs and benefits of developing greenfield areas are well understood.

A qualitative assessment of identifiable costs and benefits associated with this proposal is provided below and, where relevant, in the assessment of policies, rules and other methods contained in section 10 of this report.

Benefits:

- The use of the FUZ will ensure development and activities in identified greenfield areas are managed to prevent their fragmentation which would impact on the future development capacity of the sites, whilst allowing a suitable rural level of development and activity until such time as urban development will be ready to be undertaken.
- The requirement that a Development Plan must be developed for greenfield areas will ensure that urban development is suitably restricted until a cohesive and holistic approach to greenfield site development has been developed.
- The proposed Objectives, Policies and Rules for both Development Areas are tailored to manage effects at a site-specific level and are reflective of the Development Plans for both areas.
- The identified Development Areas are well located in relation to the existing urban area as well as the existing transport network. This will help integrate development areas into existing urban areas and the Wellington City and regional urban forms.
- The Development Plans ensure that the greenfield areas will result in efficient land use and maximise opportunities for development whilst responding to the local environment. They also allow for an improved integration of land use and transport for the areas.
- There will be social and economic benefits associated with the provision of housing and business land within the Development Areas, and additional social and wellbeing benefits with the provision of open space land, public transport connections, and community facilities.
- Greenfield development will provide for a mix of housing typologies which will support housing market growth and an anticipated higher housing yield compared to current greenfield and infill District Plan settings.

Costs:

- The change of land use from rural to urban will result in some associated environmental effects including effects on biodiversity, water quality, climate change.
- Short to medium term construction effects during the development phase are anticipated with potential effects on neighbouring communities.
- Investment in infrastructure is comparatively higher for greenfield areas due to the requirement to provide for the establishment of new three waters and transport infrastructure.
- Population growth located in these greenfield areas will increase pressure on the existing transport network without appropriate and timely investment in the network.
- The restrictions on land use in the FUZ will mean landowners have limited options for development in the interim period between the rural transitioning into new urban land uses.

7.0 Zone Framework

Based on the issues analysis in section 5.3 of this report and the National Planning Standards zone options set out in section 4.4.4, the following zone framework has been selected in relation to this topic:

Table 17: Explanation of proposed zone framework

Zone	Reasons
Future Urban Zone	<ul style="list-style-type: none"> • The National Planning Standards specifically identify this Special Purpose Zone to be applied to areas suitable for urbanisation in the future. • The FUZ ensures land will still be appropriate for future urbanisation, limiting incompatible uses. • Lincolnshire Farm is currently zoned Urban Development Area in the Operative District Plan, the purpose of which is to provide special provisions for the transition of the area from rural to urban use. • The FUZ is a natural fit for this continued purpose and to be applied to Upper Stebbings Glenside West which has been identified through a number of planning processes to undergo the same transition. • The extent of the FUZ aligns with the extent of the Development Areas and is shown in Figure 1.
Overlay	Reasons
Development Areas	<ul style="list-style-type: none"> • Development Areas are specifically identified under the National Planning Standards to be applied for areas to be spatially planned and managed using concept plans, structure plans, outline Development Plans, master plans or growth area plans. • The Development Area overlay is intended to spatially identify and manage areas where there are comprehensive plans for future land use or development. • A Development Area for each of the two greenfield areas is proposed. Each Development Area chapter will contain the individual objectives, policies, rules and standards for each spatial area.

8.0 Overview of Proposals

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report. The below tables provide high level summaries of the proposed objectives and policies.

Table 18: Summary overview of proposed provisions

Future Urban Zone	
Objectives	Four objectives that address:

	<ul style="list-style-type: none"> • The purpose of the zone. • The types of activities anticipated in the zone, being a range of rural activities until the land transitions into urban uses. • Ensuring that urban development within the zone is comprehensively designed. • Noting the need for Mana Whenua aspirations and values to be provided for in Development Areas.
Policies	<p>Four policies that:</p> <ul style="list-style-type: none"> • Link development to an associated Development Area. • Provide for rural activities during the transition to urban activities. • Avoid fragmented land parcels or activities that would compromise the purpose of developing new urban neighbourhoods. • Enable Mana Whenua values and aspirations.
Lincolnshire Farm Development Area	
Objectives	<p>Four objectives that address:</p> <ul style="list-style-type: none"> • Purpose of Development Area, being a successful new suburb of Wellington City. • Coordination and integrated form of development. • Creation of a well-functioning urban environment that has a high level of accessibility and amenity. • Natural features as an opportunity and important part of Development Areas.
Policies	<p>Six policies that:</p> <ul style="list-style-type: none"> • Provide a list of 'bottom-lines' for coordinated development, e.g., all dwellings are located within walking distance of a neighbourhood park. • Specify the type of residential development encouraged, i.e., mix of sizes, densities and types. • Outline criteria for activities that have not been anticipated or specifically provided for in the provisions. • Include requirements for the identified industrial area. • Provide a list of 'bottom-lines' for the local centre that is to be established. • Ensures a well-functioning urban environment.
Upper Stebbings and Glenside West Development Area	
Objectives	<p>Four objectives that address:</p> <ul style="list-style-type: none"> • Purpose of Development Area, being a successful new suburb of Wellington City. • Coordination and integrated form of development • Creation of a well-functioning urban environment that has a high level of accessibility and amenity.

	<ul style="list-style-type: none"> Natural features as an opportunity and important part of Development Areas.
Policies	<p>Five policies that:</p> <ul style="list-style-type: none"> Outline the activities provided for within Built Areas and no Build areas (as shown on the Development Plan). Specify the type of residential development encouraged, i.e., mix of sizes, densities and types. Provide a list of 'bottom-lines' for coordinated development, e.g., all dwellings are located within walking distance of a neighbourhood park. Outline criteria for activities that have not been anticipated or specifically provided for in the provisions. Ensures a well-functioning urban environment.

A rule framework that manages land use and building and structure activities as follows:

Activity	Future Urban Zone	Lincolnshire Farm Development Area	Upper Stebbings Glenside West Development Area
Land use activities			
Rural activities	P	NA	NA
Keeping of goats	C	NA	NA
Quarrying and Mining activities	NC	NA	NA
Rural Industry	NC	NA	NA
Intensive indoor primary production	NC	NA	NA
Pet animal boarding, breeding or day-care activities	NC	NA	NA
Residential activities	NA	P with conditions > RD	P with conditions > RD
Construction activities	NA	P	P
Recreation activities	NA	P	P
Informal recreation activities	NA	P	P
Organised sport and recreation activities	NA	P	P
Conservation activities	NA	P	P
Gardens, including community gardens	NA	P	P
Mobile commercial activities ancillary to permitted recreation and conservation activities	NA	P	P

Activity	Future Urban Zone	Lincolnshire Farm Development Area	Upper Stebbings Glenside West Development Area
Parks maintenance and repair	NA	P	P
Construction, maintenance, alternation of or addition to footpaths and tracks	NA	P	P
Construction, maintenance, alteration of, or addition to car parking areas and access drives	NA	P	P
Community facilities	NA	P	P
Educational facilities	NA	P	P
Emergency service facilities	NA	P	P
Public transport facilities	NA	P	P
Home business	NA	P with conditions > RD	P with conditions > RD
Supported residential care	NA	P with conditions > RD	P with conditions > RD
Boarding houses	NA	P with conditions > RD	P with conditions > RD
Visitor accommodation	NA	P with conditions > RD	P with conditions > RD
Childcare services	NA	P with conditions > RD	P with conditions > RD
Retirement Village	NA	RD	RD
Industrial Activities	NA	P with conditions > D	NA
Trade and industrial training facilities	NA	P	NA
Commercial activities	NA	P with conditions > NC	NA
Outdoor storage area	NA	P with conditions > D	NA
All other activities	D	D	D
Building and structure activities			
Construction, addition or alteration to buildings and structures	P with conditions > D	P with conditions > RD	P with conditions > RD
Maintenance and repair of buildings and structures	NA	P	P
Demolition or removal of buildings and structures	NA	P	P

Activity	Future Urban Zone	Lincolnshire Farm Development Area	Upper Stebbings Glenside West Development Area
Construction of buildings, accessory buildings or structures for multi-unit housing or a retirement village, and additions or alterations to multi-unit housing or a retirement village	NA	RD	RD
Fences and standalone walls	NA	P with conditions > RD	P with conditions > RD
Buildings and structures, including additions and alterations, accessory buildings, and fences and standalone walls, on or over a legal road	NA	RD	RD
Any other building or structure, including additions and alterations and accessory buildings not provided for as a permitted or restricted discretionary activity	NA	RD	RD

A complementary set of effects standards that address:

- Building bulk and location and shading; maximum height; height in relation to boundary; setback from boundaries; building coverage.
- Quality living environments; minimum outdoor living space; minimum daylight access; minimum residential unit size; privacy separation.
- Stormwater runoff controls through a minimum permeable surface standard.
- The control of building coverage in industrial areas and open spaces.

Supporting Design Guides:

- Residential Design Guide – contains guides to ensure best practice design approaches and encourage built outcomes that meet District Plan objectives and the Design Guide’s overarching principles and outcomes. All new residential development in Wellington should respond appropriately to the local natural environment, contribute to an effective public-private interface, shape a well-functioning site, and deliver a high-quality building or buildings.
- Centres and Mixed-Use Design Guide – contains guides to ensure best practice for effective public-private interface, well-functioning urban environments, and natural environment outcomes.
- Subdivision Design Guide – contains guidelines that apply to new ‘greenfield’ development as well as subdivisions within the existing urban footprint. The guidelines aim to ensure new subdivisions respond appropriately to the local natural environment, contribute to an effective public-private interface, shape a well-

functioning site and deliver a high-quality building or buildings. This includes guides such as shape and orientation of allotments, street hierarchy, and connectivity.

Both Development Areas have an accompanying appendix which contains specific requirements for the Development Areas. These additional requirements are primarily focused on the quality and quantity of open space provision, transport connections, and the requirements relating to the provision of the general industrial area and school site within the Lincolnshire Farm area.

9.0 Qualifying Matters

The FUZ is not a relevant residential zone under the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act, and therefore the medium density residential standards do not apply to the zone.

However, it is recognised that the FUZ is a transitional zone, and that in time the greenfield areas will be utilised for residential development that will apply the relevant medium density residential standards. The provisions frameworks for both Lincolnshire Farm and Upper Stebbings and Glenside West have adopted the medium density residential standards, consistent with existing residential areas in the Proposed District Plan.

Under Section 77I of the RMA, less permissible standards for development can be applied where qualifying matters have been identified and apply. As stated above, this is not a relevant consideration for the FUZ as medium density standards do not apply but is a consideration of future enabled development.

The relevant list of qualifying matters which have been applied within the Proposed District Plan can be found in the Part 1 Section 32 report. The relevant accompanying section 32 reports for those specific topics include the assessment of qualifying matters as required by Section 77J-77L of the RMA.

The Development Plans to be included within the Proposed District Plan for the two greenfield development areas do restrict development in these areas based on identified constraints, and have therefore considered relevant qualifying matters. The Development Plans were formed before the adoption of the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act, such that the assessment criteria for qualifying matters were not a relevant consideration.

For Lincolnshire Farm the Development Plan is already established in the Operative District Plan, and therefore the qualifying matters in this area can be considered as existing, meaning that the assessment requirements of Section 77k apply. The spatial extent of these qualifying matters is as shown in the Development Plan (refer to Figure 4), and the alternative density requirements are as contained within the provisions. The relevance of these qualifying matters is assessed in the associated section 32 reports, including the SNAs, Open Space, Natural Hazards, and Natural Character reports. Overall, the qualifying matters as shown in the Lincolnshire Farm Development Plan do not mean lower density standards have been applied for the medium density residential areas, but that areas with identified qualifying matters have been considered as natural open space and not identified in the Development Plan as residential areas.

The Upper Stebbings and Glenside West Development Plan is not in the Operative District Plan. The proposed Development Plan applies a 'build' or 'no-build' spatial approach to managing development. No-build areas have been identified based on existing environmental

constraints for the site, including the presence of SNAs, natural character, natural hazards and local topography. These qualifying matters are assessed in the corresponding topic section 32 reports. Where build areas have been identified then the medium density residential standards apply with no modifications to density standards as required by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act. Specific assessment of these spatial matters is contained within the relevant documents detailing the formation of the Development Plans, and as detailed in Table 11 of this report.

10.0 Evaluation of Proposed Objectives

10.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e., Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e., Will the objective guide decision-making? Does it meet sound principles for writing objectives? Does it clearly state the anticipated outcome?)
3. Reasonableness (i.e., What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e., Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed Plan, to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo.

The proposed objectives have been evaluated in two groupings, firstly the FUZ objectives, and secondly the Development Area objectives. The objectives of the two Development Areas have been considered collectively as they serve a similar purpose.

10.2 Evaluation of Objectives FUZ-O1, FUZ-O2 and FUZ-O3

Table 19: Evaluation of Objectives FUZ-O1, FUZ-O2, FUZ-O3

<p>Proposed objectives: FUZ-O1, FUZ-O2, FUZ-O3, FUZ-O4:</p> <p>FUZ-O1 – Purpose <i>The Future Urban Zone assists Wellington City to meet its residential and business growth needs through efficient greenfield developments.</i></p> <p>FUZ-O2 – Activities <i>The Future Urban Zone provides for a variety of rural activities that enable continued productive use of the rural land until such time as the land is urbanised.</i></p> <p>FUZ-O3 – Coordinated Planning and Development <i>Development within the Future Urban Zone is comprehensively designed.</i></p> <p>FUZ-O4 – Mana Whenua <i>Mana whenua values and aspirations are recognised and provided for in Development Areas controlling new urban development in the Future Urban Zone.</i></p>		
<p>General intent:</p> <p>The intent of this suite of objectives is to establish the zone’s purpose as a ‘holding zone’ and to provide a transition from rural to urban use and development.</p> <ul style="list-style-type: none"> • Objective FUZ-O1 sets out the overall purpose of the FUZ. It relates to the underlying need for the zone to provide for efficient future neighbourhood development. • Objective FUZ-O2 establishes that the primary set of activities that are to occur in the FUZ are rural. • Objective FUZ-O3 seeks to provide for the need for comprehensive and intentional design for Future Urban areas. • Objective FUZ-O4 intends to ensure integration of mana whenua perspective into provisions regarding future urban areas and development. 		
<p>Other potential objectives</p> <p>Status quo: The Operative District Plan contains a current Urban Development Area Objective that seeks to provide for sustainable urban growth in the northern suburbs of the city consistent with the vision, objectives, themes and values of the Northern Growth Management Framework. There is no objective in the Operative District Plan relating to mana whenua values and aspirations for future urban development.</p>		
	Preferred objectives	Status quo
<p>Relevance:</p>		
Addresses a relevant resource management issue	All objectives are clearly linked to the relevant resource management issues identified for the FUZ.	The status quo addresses a resource management issue at a very broad level (sustainable urban growth) which leaves the objective open for interpretation. It also references an outdated

	<p>The objectives seek to set out the purpose of the FUZ and the necessity to efficiently meet future urban growth needs in Wellington City. The area will be maintained as rural until development occurs and will be designed to efficiently meet future growth needs. FUZ-O4 seeks to improve outcomes of recognition and provision for mana whenua values and aspirations, addressing the lack of similar objective in the status quo.</p>	<p>external document which limits the relevance for the status-quo approach.</p>
<p>Assists the Council to undertake its functions under s31 RMA</p>	<p>The objectives work together to achieve an integrated management approach of greenfield use and development, relating to provision of development capacity and providing for Mana Whenua values and aspirations in the development of Development Areas.</p> <p>The proposed objectives establish the outcome sought for areas zoned as Future Urban, as well as aids the Council in achieving its functions under s31(1) of the RMA, specifically with regards to controlling any actual or potential effects of the use and development of land.</p>	<p>The status quo does not have detail in the objective, rather the detail is buried in the structure plan under the principles.</p> <p>Providing for ‘sustainable growth’ as noted in the objective, while aligning with the RMA, is broad and not as effective at assisting Council to achieve the functions under s31 of the RMA.</p>
<p>Gives effect to higher level documents</p>	<p>The objectives are consistent with Objective 22 of the Regional Policy Statement for the Wellington region, which relates to ‘Regional form, design and function’. Objective 22 is concerned with intentional and consistent urban development that offers a range of housing types and densities and takes considered management of development into rural areas.</p> <p>Under the Medium Density Residential Standards in Schedule 3A of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, clause 6 requires that a district plan must include objectives to ensure a well-functioning urban environment, for now and the future. The NPS-UD also has a focus of achieving well-functioning urban</p>	<p>The status quo objective does not give effect to the relevant higher order documents. The objective has not been updated since a number of relevant changes have been made at the national level, including the adoption of the NPS-UD, the NPS-FM, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act.</p> <p>The objective also references an outdated regional growth plan in the Northern Growth Management Framework, which has subsequently been replaced with the Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021.</p>

	<p>environments. The FUZ objectives O1, O2 and O3 give effect to this requirement.</p> <p>Objective FUZ-O4 provides for a Greater Wellington Regional Long-Term Plan strategic priority, 'Improving outcomes for mana whenua and Māori. FUZ-O4 strengthens the extent to which this priority can be met in relation to future urban development.</p> <p>The objective is also consistent with Objectives 23 to 28 of the Regional Policy Statement for the Wellington region. These six regional objectives seek the improved involvement of tangata whenua and principles of Te Ao Māori into resource management, including future urban development.</p>	As such the status quo objective fails to give effect to the relevant higher order documents.
<i>Usefulness:</i>		
Guides decision-making	<p>The objectives are succinct and clear, which will aid decision-makers when considering proposals regarding the zone.</p> <p>The objectives state clear outcomes that can be integrated to guide decision-making in the FUZ and the development of new Development Areas.</p>	<p>There is only one high level objective contained in the current Urban Development Area Chapter of the Operative District Plan. This means it is difficult for decision makers to know what outcomes it is intended to achieve. 'Sustainable growth' can be interpreted in many different ways.</p> <p>The absence of specific objectives relevant to mana whenua values and aspirations in this zone does not aid or guide decision-makers.</p>
Meets best practice for objectives	Proposed objectives are concise and are phrased as outcomes which is consistent with best practice and aligned with the Plan wide approach for the drafting of objectives.	The status quo does not meet best practice given it references an outdated external document and is very broad.
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	<p>The proposed objectives are strategic and have been assessed to not impose any unjustifiably high costs on the community.</p> <p>The objectives recognise that rural activities can continue until urban development is undertaken, which</p>	<p>The status quo has not been identified as imposing unjustifiably high costs on the community or parts of the community.</p> <p>Similarly, to the proposed approach the requirement for the inclusion of Structure Plans for</p>

	ensure short-term costs for landowners is appropriately managed. There will be a cost for developers who will be required to ensure that development meets FUZ-O3, but this is a reasonable cost to expect to ensure greenfield land is developed in an efficient manner.	greenfield development does put a cost on landowners, but this cost is not unjustified.
Acceptable level of uncertainty and risk	There is very low expected risk or uncertainty associated with the proposed objectives as they set clear outcomes which have been well established through higher-order direction.	There is a risk that applications are assessed against the status quo under s104D of the RMA for non-complying activities and cannot be declined given the broad scope of the objective, as has happened in the past.
Achievability:		
Consistent with identified tangata whenua and community outcomes	Proposed objectives are consistent with most of the feedback from the Planning for Growth programme indicating the community's support of developing the identified greenfield areas. Tangata whenua have not provided specific feedback on the proposals but discussions with tangata whenua in the drafting process indicated the potential use of the zone in the future for Māori-owned land.	Given the objective references outdated document, it is not consistent with current feedback.
Realistically able to be achieved within the Council's powers, skills and resources	Yes. The proposed approach is well understood and within Council's statutory powers.	Yes
Summary		
<p>The proposed objectives FUZ-O1, FUZ-O2 and FUZ-O3 establish the purpose and intended activities for the zone, as well as acknowledge the importance of comprehensive design processes for future urban Development Areas. The proposed objectives improve upon the status quo objective by being more dedicated to the needs of the FUZ, giving effect to current higher order documents and national direction, and continuing to assist the Council in fulfilling its functions under RMA s31.</p> <p>The proposed objective FUZ-O4 establishes that activities within and provisions for the FUZ shall take mana whenua values and aspirations in to account, where the Operative District Plan lacked a similar set of objectives(s). The proposed objective improves upon the status quo, which is silent on the recognition of mana whenua values and aspirations in the equivalent zone chapter. This objective will assist the Council in fulfilling its functions under the RMA s31 and the wider principles of the RMA.</p>		

Overall, the proposed objectives are considered to be the most appropriate way to manage the FUZ, reflecting the current higher order documents, national direction, and growth planning. It provides a transitional zone where rural activities can be undertaken whilst managing development in a way that will not compromise the ability for greenfield sites to deliver integrated and high quality housing and business developments.

10.3 Evaluation of Objectives under Lincolnshire Farm Development Area and Upper Stebbings and Glenside West Development Area

Table 20: Evaluation of Objectives for Development Areas

Proposed objectives for Lincolnshire Farm Development Area (DEV2) and Upper Stebbings and Glenside West (DEV3) Development Area

DEV2-01 - Purpose

Lincolnshire Farm is a well-connected suburb that accommodates new residential and business growth supported by a range of activity types.

DEV2-02 – Activities and development

Activities are carried out in an integrated and coordinated way.

DEV2-03 – Amenity and Design

Development in the Lincolnshire Farm Development Area creates an attractive and well-functioning urban environment that delivers compact urban form and a high level of accessibility and amenity.

DEV2-04 – Natural Environment

Access to and within natural open space is maintained and enhanced as part of the comprehensive urban development of the area.

DEV3-01 – Purpose

Upper Stebbings and Glenside West are well-connected neighbourhoods that accommodate new residential growth supported by community and open space activities.

DEV3-02 – Activities and development

Activities are carried out in an integrated and coordinated way.

DEV3-03 – Amenity and Design

Development in the Upper Stebbings and Glenside West Development Area creates an attractive and well-functioning urban environment that delivers compact urban form and a high level of accessibility and amenity.

DEV3-04 – Natural Environment

Access to and within natural open space is maintained and enhanced as part of the comprehensive urban development of the area.

General intent:

The general intent of this suite of objectives is to identify the key considerations and outcomes that should be achieved for the Lincolnshire Farm and Upper Stebbings and Glenside West Development Areas, including:

- what the identified greenfield area will be utilised for, in this case residential and business development
- ensuring a holistic and efficient approach is taken to development of the greenfield area
- ensuring that development in the Development Area creates a well-functioning urban environment
- ensuring that development within the greenfield area is integrated into the natural environment such that access is maintained and enhanced.

Other potential objectives

Status quo: One objective that broadly states the aim of providing for sustainable urban growth and which references back to the Northern Growth Management Framework. There are no objectives specific to either Development Area. The status quo has principles within the Lincolnshire Farm Structure Plan which are framed as overarching goals of the structure plan.

	Preferred objectives	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	<p>The objectives address the issue of efficiently using resources, in this case greenfield land, as well as the provision of housing and business land which can be provided in a holistic coordinated manner, which are relevant resource management issues.</p> <p>The objectives also consider the natural environment and amenity values with regards to development with the purpose of achieving a well-functioning urban environment.</p> <p>As such the objectives are well linked to the relevant resource management issues for Development Areas and seek outcomes that address these issues.</p>	<p>The current equivalent zone, Urban Development Area, has one objective, which focuses on the now-defunct Northern Growth Management Framework (replaced by Spatial Plan 2021).</p> <p>The single objective is also not sufficiently detailed to be considered effective at addressing the different resource management issues for Development Areas.</p>
Assists the Council to undertake its functions under s31 RMA	<p>The objectives enable Council to undertake the relevant functions as required under s31 of the RMA, including the requirement for reviewing objectives, policies and methods, ensuring that there is sufficient development capacity to meet identified housing and business demand, and manage the effects of development.</p>	<p>The status quo does not have detail in the objective, rather the detail is buried in the structure plan under the principles.</p>
Gives effect to higher level documents	<p>The objectives help give effect to the NPS-UD requirement to provide sufficient land for housing and</p>	<p>The status quo objective does not give effect to the relevant higher order documents. The objective has not</p>

	<p>business purposes, and to enable development that creates well-functioning urban environments, which can be achieved through cohesive development of greenfield areas.</p> <p>They also give effect to the RPS, in particular Objective 22, which is concerned with intentional and consistent urban development that offers a range of housing types and densities and takes considered management of development into rural areas.</p> <p>The objectives also implement the strategic objectives outlined in Section 3 of this report.</p>	<p>been updated since a number of relevant changes have been made at the national level, including the adoption of the NPS-UD, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill.</p> <p>The objective also references an outdated regional growth plan in the Northern Growth Management Framework, which has subsequently been replaced with the Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021.</p> <p>As such the status quo objective fails to give effect to the relevant higher order documents.</p>
<i>Usefulness:</i>		
Guides decision-making	The objectives provide a clear direction for decision making and follow a logical cascade based on the purpose, activities and outcomes for the Development Areas, such that decision makers can make clear decisions.	The high level of the objective means it is difficult for decision makers to know what outcomes it is intended to achieve.
Meets best practice for objectives	The objectives are written as clear and explicit outcome statements that are concise and easy to interpret, with review comments and draft plan submissions taking into account in the development of objectives.	The status quo does not meet best practice given it references an outdated external document and is very broad.
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	There may be some additional costs for developers being required to meet higher environmental standards for new development. This however will have wider community and environmental benefits, such as improved water quality, better access to alternative forms of transport, higher levels of amenity, and additional recreational resources.	Status quo does not impose unjustifiably high costs on the community or parts of the community
Acceptable level of uncertainty and risk	Overall, there is a low level of uncertainty and risk as substantial work has been undertaken to develop the proposed master-planning of the Development Area,	There is a risk that applications are assessed against the status quo under s104D of the RMA for non-complying

	which has been the subject of multiple assessments as well as consideration through the HBA 2022 and community consultation.	activities and cannot be declined given the broad scope of the objective, as has happened in the past.
Achievability:		
Consistent with identified tangata whenua and community outcomes	Aligns with the feedback from the community through the consultation processes undertaken in the development of the Development Plans, and the Draft District Plan feedback process. Tangata whenua have not provided specific feedback on the proposals but discussions with Tangata Whenua in the drafting process indicated there were no particular Tangata Whenua or mana whenua interests in these chapters.	Given the objective references outdated document, it is not consistent with current feedback and the outcomes sought by the community.
Realistically able to be achieved within the Council's powers, skills and resources	Yes, Council has the power to identify greenfield areas and introduce suitable objectives for managing development in these areas under its statutory powers.	The status quo objective is outdated as it references a superseded document, but is still achievable within the statutory powers of Council.
Summary		
<p>The proposed objectives are the most appropriate way to achieve the RMA as they provide concise, clear outcomes in a more detailed way than the status quo. This will result in clearer guidance for developers, the community, and decision makers. The objectives set clear purposes and outcomes for the greenfield Development Areas, with integrated development that achieves well-functioning urban environments. The objectives are aligned with higher level documents and address relevant resource management issues with regards to greenfield development and housing provision. The objectives also align with community outcomes.</p> <p>The current status quo is limited in its scope and is linked to a superseded document, such that it is not effective in managing greenfield areas and cannot be relied upon to suitably guide decision making.</p>		

11.0 Evaluation of Reasonably Practicable Options and Associated Provisions

11.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objectives associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objectives.

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering, and analysis undertaken in relation to this topic a reasonably practicable alternative option to achieve the objectives.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

11.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

11.3 Provisions to achieve Objectives in the Future Urban Zone, Lincolnshire Farm Development Area, and Upper Stebbings and Glenside West Development Area

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions (this includes the provisions for the FUZ and the tailored provisions frameworks for each Development Area)
2. The status quo approach to managing urban Development Areas
3. A residential zoning approach for the greenfield areas and a provisions framework that enables residential development.

The proposed provisions are evaluated separately for the FUZ and each Development Area. As the status quo for the FUZ and the Development Areas is largely identical the status quo is only assessed once, and one relevant alternative has been identified for all preferred options.

This reasonable alternative is the immediate zoning and enablement of residential and business commercial/industrial land use within the identified greenfield areas, with the subsequent removal of any requirement for the adoption of a Development Plan. The proposed provisions in this alternative will be enabling of residential and business land whilst managing subsequent effects and will be less prescriptive on the delivery of supporting community infrastructure than the proposed approach.

Table 21: Evaluation of provisions to achieve FUZ and Development Area objectives

Future Urban Zone Objectives:			
FUZ-O1 - Purpose			
FUZ-O2 - Activities			
FUZ-O3 - Coordinated Planning and Development			
FUZ-O4 - Manu Whenua			
Option 1a: Proposed provisions approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u> FUZ-P1: Accommodating Growth FUZ-P2: Rural Activities FUZ-P3: Incompatible Activities</p> <p><u>Rules:</u> <u>Land Use Activities</u> FUZ-R1 Rural Activities – Permitted FUZ-R2 Keeping of Goats – Controlled/Restricted Discretionary FUZ-R3 Quarrying and Mining activities – Non-complying FUZ-R4 Rural Industry – Non-complying</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • The provisions establish that this is a transitional zone from the existing rural land use and character to a future urban land use, with an associated loss of rural character once the enabled change from rural to urban has been completed. • In the long-term there will be a loss of land that could be utilised for primary production purposes as well as restricting those activities in the greenfield areas in the transition period. • As urban development is anticipated within the zone there will be associated environmental effects, however these are considered in more detail at the Development Area provision level and 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • Restricting development and activities in the FUZ will have positive effects for environmental values in the short term. • Rural character and amenity will be maintained until the transition between rural and urban land use takes place. • Land will be more effectively utilised by supporting comprehensive residential development and restricting land use and development that would prevent a more holistic and integrated approach to greenfield development. • Positive effects for biodiversity are anticipated through restricting primary production activities and introducing 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> • There is sufficient evidence that supports controlling activities in the FUZ to ensure greenfield land is able to be developed in an integrated way. • There is a proven need established through evidence to provide additional land for housing and industrial use. • This approach aligns with the relevant

<p>FUZ-R5 Intensive indoor primary production – Non-complying</p> <p>FUZ-R6 Pet animal boarding, breeding or day-care activities – Non-complying</p> <p>FUZ-R7 All other activities – Discretionary</p> <p><u>Building and Structure Activities</u></p> <p>FUZ-R8 Construction, addition or alteration to buildings and structures – Permitted/Discretionary</p> <p><u>Other Methods:</u></p> <p><u>Effects Standards</u></p> <p>FUZ-S1 Maximum height</p> <p>FUZ-S2 Maximum gross floor area</p> <p>FUZ-S3 Boundary setbacks</p> <p>FUZ-S4 Fences and standalone walls</p> <p>FUZ-S5 Fencing requirements</p>	<p>will not occur while the FUZ enabled activities continue.</p> <p><i>Economic</i></p> <ul style="list-style-type: none"> • There is the potential for economic costs for landowners within the zone in the short term as a result of a restrictive provisions framework, limiting the ability for change of use and development at a small scale. • Restricting development and land use activities through the FUZ provisions with no clear timeframe for when the transition between rural and urban land uses will take place will mean limited motivation for landowners to invest in land or building improvements. However, all landowners within the FUZ have the intent of using the land for urban development, which will be enabled in time. • The requirement for a Development Plan to be established before development can be undertaken is a higher cost for landowners, although this is largely mitigated by the fact that the land within the FUZ already has an associated Development Plan and has already been part of a community spatial planning / master planning process. 	<p>provision relating to the keeping of goats.</p> <ul style="list-style-type: none"> • The provisions restrict activities that may have permanent effects on the rural environment, such as intensive indoor primary production or quarrying and mining. The intention behind these restrictions is to ensure the land is ready for urban development. • Overall existing environmental constraints will be able to be considered in a more integrated manner when development is planned, designed and approved. • Environmental effects will still be managed through the resource consenting process. <p><i>Economic</i></p> <ul style="list-style-type: none"> • Significant economic positive effects are anticipated as a result of the future development of greenfield areas as supported through the FUZ provisions framework. • The delivery of housing and business land on greenfield sites will have positive economic effects through job creation and housing to address current identified shortfalls, with flow on positive economic effects into supply chains. 	<p>higher order direction for greenfield areas.</p> <ul style="list-style-type: none"> • There has been limited feedback on the FUZ provisions through community consultation which suggests the general public agree with the proposed approach • The transitional provisions for ongoing rural land use align with known approaches for these rural activities in other rural locations.
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	<p>Social</p> <ul style="list-style-type: none"> The eventual development of greenfield sites will have some short-term effects on neighbouring landowners during the construction phase and some long-term effects on some nearby communities for example in increased population and local traffic. <p>Cultural</p> <ul style="list-style-type: none"> There is unlikely to be a cultural cost to these provisions. There is no known Māori owned land or areas of significance to Māori in the FUZ areas. 	<ul style="list-style-type: none"> Enabling rural activities in the short term will have small scale economic benefits for landowners until urban development can be undertaken. <p>Social</p> <ul style="list-style-type: none"> Future positive social effects include greater access to different housing typologies and employment opportunities when the transition to urban land use is progressed. Integrated development through requiring Development Plans for greenfield areas will allow for better provision of social infrastructure to support housing and business development with associated wellbeing benefits. Certainty is being provided to the community on the location and quality of future urban development. <p>Cultural</p> <ul style="list-style-type: none"> Positive effects for cultural values are anticipated as there is a relevant objective that Mana whenua values will be recognised and provided for in Development Areas, such that future urban development in these areas are expected to align with mana whenua values. 	
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<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The provisions are considered to be highly effective at controlling development and activities in the FUZ with the purpose of ensuring greenfield sites are not fragmented before being utilised for urban development. This is through a suitably restrictive approach to activities which is supported by the outcome but allows suitable rural activities to continue in the interim period.</p> <p>The provisions are also effective at directing the intended outcome for the greenfield sites as being for urban development and will ensure greenfield sites are developed in a cohesive and efficient manner. As such the approach strikes an effective balance between current and future land use.</p>	<p><i>Efficiency</i></p> <p>The provisions are efficient based on the overall minimal costs which have been identified, and the varied and effective benefits which have been identified.</p> <p>Identified costs are overall limited and largely restricted to the ability for landowners to develop land and diversify land-use in the short term, but this is largely mitigated by the fact that landowners are seeking to transition to urban development.</p> <p>The application of Future Urban zoning in this circumstance is as anticipated by the National Planning Standards and therefore considered an efficient approach to managing areas that are transitioning to urban development.</p> <p>The benefits of using the FUZ to manage greenfield areas are notable, including short and long term environmental benefits, cultural benefits through the consideration of mana whenua values, and economic effects through future enablement of residential and business land uses.</p>
<p><u>Overall evaluation</u></p>	<p>The provisions framework is tailored to permitting suitable rural activities but establishes that this is a transition zone to manage land use activities until urban development is arranged for the greenfield site, such that this is a suitable approach to take. The approach has small scale costs largely associated with the ability for existing landowners to develop or use their land for activities restricted through these provisions, however as the current owners are supportive and seeking enablement of urban development, this effect is minor. There are substantial positive effects associated with the approach proposed in the provisions to managing greenfield areas until development can occur.</p>	

Lincolnshire Farm Development Area Objectives:			
DEV2-O1 – Purpose DEV2-O2 – Activities and development DEV2-O3 – Amenity and Design DEV2-O4 – Natural Environment			
Option 1b: Proposed provisions approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Policies:</u> DEV2-P1: Coordinated Development DEV2-P2: Residential Activities DEV2-P3: Potentially Compatible Activities DEV2-P4: Sensitive activities within the Industrial Area DEV2-P5: Amenity and Design DEV2-6: Local Centre</p> <p><u>Rules and requirements:</u> <i>DEV2-R1 to DEV2-R7:</i> Management of land use activities in the General Industrial area <i>DEV2-R8 to DEV2-R31:</i></p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • Through the development and urbanisation process there is potential for a range of temporary and permanent adverse effects to occur. Examples of potential adverse environmental effects include effects from earthworks, changes to landform, effects on surrounding streams, stormwater runoff, effects on SNAs, and natural landscape and rural character. • There are environmental costs that come with construction, particularly of new urban areas that require new infrastructure to support the development. • The existing rural character and landform will largely be altered and lost 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • The land at Lincolnshire Farm will be developed efficiently as guided by the provision’s framework, with development across the site delivered in a coordinated fashion. • Positive effects for the natural environment are anticipated through identification of SNAs and the subsequent Development Plan ensuring that natural features are maintained as open space areas, and access is maintained and enhanced. • The use of a Development Plan allows for a comprehensive consideration of environmental constraints across the site which can be managed in a holistic fashion, as well as relying on the district wide provisions for managing effects, for 	<p>There is sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> • Significant work has been undertaken in the preparation of the Development Plan for Lincolnshire Farm. • There is wider supporting evidence in the Spatial Plan, the Wellington Regional Growth Framework (WRGF), and the HBA 2022, that urbanisation of this land is required to meet city-wide and regional housing and business demand.

<p>Management of land use activities in all other areas. DEV2-R32 to DEV2-R40: Management of land use activities in the Natural open Space area DEV2-R41 to DEV2-49: Building and structure controls DEV2-S1 to DEV2-S24: Effects standards for all areas DEV2-APP-R1 to DEV2-APP-R6: Specific requirements for the delivery of community infrastructure and other relevant considerations</p> <p>Other Methods:</p> <ul style="list-style-type: none"> • Development Plan • Code of Practice for Land Development • Design Guides (Subdivision, Residential and Centres and Mixed Use) • Development Contributions 	<p>as a result of large-scale urban development.</p> <p>Economic</p> <ul style="list-style-type: none"> • Economic costs are considered limited since the framework allows for substantial development of both housing and employment land, which is supported by the landowners. • The continuation of current land uses until such time as the area is re-developed will minimise costs that can occur when land is transitioning between uses ('planning blight'). <p>Social</p> <ul style="list-style-type: none"> • There is the potential for some short to medium term direct and indirect effects for neighbouring residents during associated disruption caused by the construction phase of future development. • There is potential for some long-term effects on some nearby communities as a result of increased population, such as with increased local traffic. <p>Cultural</p> <ul style="list-style-type: none"> • There is unlikely to be a cultural cost to these provisions. There is no Māori owned land or identified areas of 	<p>example to protect streams and flood hazards.</p> <ul style="list-style-type: none"> • The urban environment for the Development Area will be well integrated to ensure development is well located and connected with transport routes and has good access to facilities such as parks and schools, creating a well-functioning urban environment in line with the NPS-UD objectives • Provisions that manage effects between industrial zoned areas and residential areas will ensure suitable amenity levels are achieved and maintained for residents. • Public transport and active travel mode infrastructure is required in the design and development of the Development Area to mitigate carbon emissions as a result of the new development, and aligning with the objective of the Te Atakura - First to Zero strategy. • The Design Guides encourage and advocate for environmental and sustainable design in the design and construction of new development. • The enablement of conservation activities can result in positive environmental effects. 	<ul style="list-style-type: none"> • This approach aligns with the relevant higher order direction for greenfield areas.
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	<p>significance to Māori in the Development Area.</p>	<p>Economic</p> <ul style="list-style-type: none"> • Significant economic benefits are anticipated through the delivery of housing which will help address the identified housing supply issue, including for current landowners who will be able to develop their land with economic advantages. • The enabled development will provide for the creation of short to medium term employment opportunities during the construction phase with trickle down benefits through the construction supply chain. • The Lincolnshire Farm Development Plan includes the provision of Industrial Land which will create a stable future for businesses within Wellington City, particularly given much of the current industrial land is vulnerable to natural hazards, sea level rise or conversion to residential uses. The industrial land will provide for employment opportunities in the local area, and provide for significant vacant business space as considered through the business aspect of the HBA 2019. • The Lincolnshire Farm Development Plan will also include the provision of a local centre, which recognises and 	
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		<p>provides space for commercial business use and provide additional employment opportunities.</p> <ul style="list-style-type: none"> • The minimum density requirement will ensure that housing delivery is maximised across the site. The provisions will allow for suitable permitted activities and development and therefore economic benefits are expected for landowners through less consenting costs. <p>Social</p> <ul style="list-style-type: none"> • The Development Area will provide for a mixed typology of housing that will improve the availability of housing for different needs, including improving accessibility to affordable housing, and providing for housing in line with the HBA 2022 capacity requirements. • The requirement for bus route servicing for the Development Area will have positive effects on people's ability to utilise public transport. • The required provision of both active community open space and natural open space areas in the Development Area will have positive effects for the mental and physical wellbeing of future residents, 	
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		<p>including supporting of community activities such as community gardens.</p> <ul style="list-style-type: none"> • The use of a Development Plan provides greater certainty to the community and landowners with regards to the scale and type of development anticipated within greenfield areas. <p>Cultural</p> <ul style="list-style-type: none"> • No significant cultural benefits are anticipated for the development based on the absence of Māori owned land or Māori interests. 	
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed approach is an effective way of managing greenfield development to make the most efficient use of the Lincolnshire Farm site whilst delivery a high-quality urban environment.</p> <p>The proposed provisions are assessed as being highly effective. They determine areas deemed suitable for future urbanisation based on a body of evidence; clearly set out the process for future development; enable residential development; require associated social and physical infrastructure; guide new urban development to be well-functioning with positive amenities; and enable industrial and commercial development.</p>	<p><i>Efficiency</i></p> <p>The benefits are assessed as outweighing the costs, and the efficiency of the proposed provisions are therefore considered to be high. The provisions create high economic and social benefits with the provision of more housing choice and employment opportunities. The Development Area suitably guides development of the new urban area to be high quality, well-functioning and well-serviced neighbourhoods that will bring long term benefits to the region.</p> <p>The proposed provisions create certainty for the landowners and developers that have a stake in the FUZ areas. Greater certainty means costs can be better planned for and development made more efficient. It also lowers the risk that development will not occur.</p>	

<u>Overall evaluation</u>	Overall, the provisions demonstrate a strong range of benefits and limited identified costs. They are effective and efficient at achieving the objectives for the Development Area, with the policy framework clearly linked to the sought outcomes in the objectives. The provisions are suitably detailed to guide decision making and are linked to land use areas in the Development Plan but also consider interactions between different land uses, provide some flexibility to facilitate good outcomes, and provide mechanisms to suitably manage effects.		
Provisions for Upper Stebbings and Glenside West Development Area Objectives: DEV3-O1 – Purpose DEV3-O2 – Activities and development DEV3-O3 – Amenity and Design DEV3-O4 – Natural Environment			
Option 1c: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<u>Policies:</u> DEV3-P1: Activities DEV2-P2: Residential Activities DEV2-P3: Potentially Compatible Activities DEV2-P4: Coordinated Development DEV2-P5: Amenity and Design <u>Rules and requirements:</u>	<i>Environmental</i> <ul style="list-style-type: none"> Through the development and urbanisation process there is potential for a wide range of temporary and permanent adverse effects to occur. Examples of potential adverse environmental effects include effects from earthworks, changes to landform, effects on surrounding streams, stormwater runoff, effects on SNAs, and natural landscape and rural character. There are environmental costs that come with construction, particularly of 	<i>Environmental</i> <ul style="list-style-type: none"> The Development Plan will enable the most efficient use of the site whilst reflecting the topographical and environmental constraints of the Development Area. Activities on identified ridgetops are restricted which will maintain rural amenity the natural ridgetops in the Upper Stebbings and Glenside West area. The creation of a reserves network can result in positive effects for biodiversity. 	There is sufficient information on which to base the proposed policies and methods as: <ul style="list-style-type: none"> Significant design and consultation work has been undertaken on the Development Plan for the Upper Stebbings and Glenside West area. There is wider supporting evidence, including in the Spatial Plan, the WRGF and the HBA 2022, that

<p>DEV3-R1 to DEV3-R15: Management of land use activities in identified build areas</p> <p>DEV3-R16 to DEV3-R24 Management of activities in all areas</p> <p>DEV3-R25 to DEV3-33: Rules relating to building and structures</p> <p>DEV3-S1 to DEV3-S19: Effects standards for all areas</p> <p><i>DEV3-APP-R1 to DEV3-APP-R5</i>: Specific requirements for the delivery of community infrastructure and other relevant considerations</p> <p><u>Other Methods:</u></p> <ul style="list-style-type: none"> • Development Plan • Code of Practice for Land Development • Design Guides (Subdivision, Residential and Centres and Mixed Use) • Development Contributions 	<p>new urban areas that require new infrastructure to support the development.</p> <ul style="list-style-type: none"> • The existing rural character will largely be altered and lost as a result of urban development. • The existing landform will be modified, however alterations to prominent ridgetops and natural features will be minimised through identification of these areas as 'no build' areas. <p><i>Economic</i></p> <ul style="list-style-type: none"> • Economic costs are considered limited based on the fact that the framework allows for substantial development of both housing and employment land, which is supported by the landowners. • The continuation of current land uses until such time as the area is re-developed will minimise costs that can occur when land is transitioning between uses ('planning blight'). <p><i>Social</i></p> <ul style="list-style-type: none"> • There is the potential for some short to medium term direct and indirect effects for neighbouring residents during associated disruption caused by the construction phase. 	<ul style="list-style-type: none"> • The character of identified landforms (areas of ridgetops and natural values) is expected to be maintained or enhanced through the identification of no build areas which will be characterised by natural open space. • Public transport and active travel mode infrastructure is required in the design and development of the FUZ areas to mitigate carbon emissions as a result of the new development, and aligning with the objective of the Te Atakura - First to Zero strategy. • The Design Guides encourage and advocate for environmental and sustainable design in the design and construction of new development. • The enablement of conservation activities can result in positive environmental effects. <p><i>Economic</i></p> <ul style="list-style-type: none"> • Significant economic benefits are anticipated through the delivery of housing which will have subsequent impacts on the wider housing stock for the City and region. • The enabled development will provide for the creation of short to medium term employment opportunities during the construction 	<p>housing is required, and greenfield areas can make a significant contribution to that need.</p> <ul style="list-style-type: none"> • This approach aligns with the relevant higher order direction for greenfield areas.
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	<ul style="list-style-type: none"> • There is potential for some long-term effects on some nearby communities as a result of increased population, such as with increased local traffic. <p>Cultural</p> <ul style="list-style-type: none"> • There is unlikely to be a cultural cost to these provisions. There is no Māori owned land or identified areas of significance to Māori in the Development Area. 	<p>phase with trickle down benefits to the construction supply chain.</p> <ul style="list-style-type: none"> • The minimum density requirement will ensure that housing delivery is maximised across the Development Area. <p>Social</p> <ul style="list-style-type: none"> • The Development Area will provide for a mix of housing typologies that will improve the availability of housing for different needs, including improving accessibility to affordable housing, and providing for housing in line with the HBA 2022 capacity requirements. • The requirement for bus route servicing for the Development Area will have positive effects on people's ability to utilise public transport. • The required provision of open space in the Development Area will have positive effects for the mental and physical wellbeing of future residents, including supporting of community activities such as community gardens. • The use of a Development Plan provides greater certainty to the community and landowners on the 	
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		<p>scale and type of development anticipated within greenfield areas.</p> <ul style="list-style-type: none"> Facilitating an integrated and coordinated approach to urban development will ensure that the resulting development is a well-functioning urban environment. <p>Cultural</p> <ul style="list-style-type: none"> No significant cultural benefits are anticipated for the development based on the absence of Māori owned land or Māori interests. 	
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed approach is considered to be an effective way of managing greenfield development to make the most efficient use of the site whilst delivery a high-quality urban environment.</p> <p>The proposed provisions are assessed as being highly effective. They determine areas deemed suitable for future urbanisation based on a body of evidence; clearly set out the process for future development; enable residential development; require associated social and physical infrastructure; guide new urban development to be well-functioning with positive amenities; and enable industrial and commercial development.</p>	<p><i>Efficiency</i></p> <p>The benefits are assessed as outweighing the costs, and the efficiency of the proposed provisions are therefore considered to be high. The provisions create high economic and social benefits with the provision of more housing choice and employment opportunities. The Development Area suitably guides development of the new urban area to be high quality, well-functioning and well-serviced neighbourhoods that will bring long term benefits to the region.</p> <p>The proposed provisions create certainty for the landowners and developers that have a stake in the FUZ areas. Greater certainty means costs can be better planned for and development made more efficient. It also lowers the risk that development will not occur.</p>	

Overall evaluation	Overall, this assessment demonstrates a strong range of benefits across limited identified costs. They are effective and efficient at achieving the objectives for the Development Area, with the policy framework clearly linked to the sought outcomes in the objectives. The provisions are detailed to guide decision making and are linked to land use areas in the Development Plan but also consider interactions between different land uses to suitably manage effects.		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>27.2.1.1 Identify existing rural land suitable for new urban development and progressively rezone this land to facilitate development in accordance with approved Structure Plans.</p> <p>27.2.1.2 Allow all permitted rural activities to continue until urban development occurs.</p> <p>27.2.1.3 Ensure that Structure Plans are responsive to the physical and ecological context of the area to which they apply, establish a sound public space structure, promote the coordinated and integrated provision of infrastructure and transport networks and</p>	<p>Environmental</p> <ul style="list-style-type: none"> The environmental costs of the status quo are similar to the proposed provisions. Both sets of provisions establish the areas as transitional zones and make way for a significant change in the environment from rural to urban, with a resulting loss of rural character. Environmental effects from construction activities and land use are to be expected. Examples of potential adverse environmental effects include effects from earthworks, changes to landform, effects on surrounding streams, stormwater runoff, effects on SNAs, and natural landscape and rural character. <p>Economic</p>	<p>Environmental</p> <ul style="list-style-type: none"> The environmental benefits of the status quo are similar to the proposed provisions, with the management of greenfield land in the interim ensuring that rural activities can occur but are appropriately controlled to ensure greenfield sites remain viable for urban development. The use of structure plans can ensure that environmental constraints can be considered site wide and cumulative effects from development and land use activities can be considered. While new provisions are proposed in regard to protecting SNAs, under the status quo structure plan for Lincolnshire Farm the SNAs are 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as the greenfield areas have been identified for urban development. The status-quo is also the established approach to managing greenfield growth and was implemented through the relevant plan development process.</p>

<p>otherwise reflect the vision, objectives, themes and values of the approved Northern Growth Management Framework.</p> <p>27.2.1.4 Require all development proposals, including subdivision, land use and associated earthworks to be assessed against approved Structure Plans.</p> <p>27.2.1.5 Ensure at the early design stages that developments proposed near high voltage transmission line corridors comply with all relevant regulations and codes of practice.</p> <p>27.2.1.6 Ensure the sound design, development and servicing of subdivisions.</p> <p>27.2.1.7 Promote a variety of residential densities and housing types including more intensive residential development, close to employment or neighbourhood centres.</p> <p>27.2.1.8 Encourage mixed use development but ensure that non-residential uses are appropriately integrated as part of the overall design of new developments.</p>	<ul style="list-style-type: none"> • The status quo creates undue restrictions on development within the Development Areas. Nearly all development requires resource consent, regardless of whether it is expected or not in that area. This approach makes it more onerous to develop within the Urban Development Area zone than anywhere else in the City. It results in increased resource consent fees and time to develop anything within the Development Area. • This in turn means Council is less able to enable development that will help address the identified housing shortfall. • The status quo does not provide for as much housing as the proposed provisions. Part of the identified residential areas in the Lincolnshire Farm Structure Plan are set aside as rural residential, meaning that it is restricted to low density development. • The standards under the status quo also limit the density of development, which is not consistent with the NPS-UD, and do not include the medium density residential standards. <p>Social</p> <ul style="list-style-type: none"> • The status quo does not have much certainty over the social infrastructure that is to be provided alongside residential and commercial 	<p>identified to be green spaces regardless and so are protected.</p> <p>Economic</p> <ul style="list-style-type: none"> • The status quo provides for the development of housing and commercial activity in the city and therefore has many of the significant benefits as described under the proposed provisions evaluation. • Benefits include the job opportunities in the new employment area and during design and construction; and the economic benefits of providing more housing to contribute to easing housing pressure in the region. <p>Social</p> <ul style="list-style-type: none"> • The status quo has policies and design guides that outline the new development should be well-connected, have access to recreation opportunities, and that development provided is coordinated. • Positive social effects are expected through the creation of neighbourhoods that will provide some social infrastructure. • Positive effects are anticipated through the delivery of housing and employment land. 	
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<p>27.2.1.9 Ensure that employment or neighbourhood centres are developed in a coordinated manner and are integrated with and protect the amenities of the surrounding neighbourhood.</p> <p>27.2.1.10 Ensure that neighbourhood centres are well designed, compact and well connected with a high level of amenity to provide facilities for local people as opposed to destination retailing.</p> <p>27.2.1.11 Ensure that most employment centres land is retained primarily for non-retail employment related uses and are well designed, compact and well connected with a high level of amenity.</p> <p>27.2.1.12 Ensure that large out-of-centre retail developments do not adversely impact on the efficiency and effectiveness of other town centres and do not;</p> <ul style="list-style-type: none"> • compromise Wellington’s compact urban form; • result in a loss of vibrancy and vitality of other Centres; 	<p>development. The recreational, education and social services are only generally articulated within the Structure Plan and the features, size, quantity of open space, schools, and community centres are not specified. This raises the risk that these services and social infrastructure will either not be provided at all, not be provided in a timely manner alongside the progress of development, or not be provided in the form necessary for a well-functioning neighbourhood.</p> <p>Cultural</p> <ul style="list-style-type: none"> • There are unlikely to be specific cultural costs associated with status quo. 	<p>Cultural</p> <ul style="list-style-type: none"> • There are unlikely to be specific cultural benefits associated with the status quo. 	
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<ul style="list-style-type: none"> • lead to an inefficient use of resources; • compromise the use and future development of sustainable transport options. <p>27.2.1.13 Provide for rural /residential development on steeper hillside areas while ensuring that subdivisions and building development are designed to fit the natural features and landscape of the site.</p> <p>27.2.1.14 Ensure that proposed land use and subdivision activity will not compromise the future development or subdivision of land for urban development purpose.</p> <p><u>Rules:</u></p> <p>28.1.1 Permitted Rural activities</p> <p>28.1.2 Permitted Residential activities</p> <p>28.2.1 Controlled Rural activities</p> <p>28.3.1 Restricted Discretionary rural activities and buildings</p> <p>28.3.2 Subdivision and associated earthworks</p>			
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<p>28.3.3 Restricted Discretionary Residential activities and buildings 28.3.3A Residential activities and buildings 28.3.4 Neighbourhood and Employment centres 28.3.5 Residential activities and buildings in rural residential areas 28.3.6 Cleanfills 28.4 Other activities</p> <p><u>Other Methods:</u></p> <ul style="list-style-type: none"> • Structure Plans • Design Guides (Subdivision and Multi-Unit Housing) • Code of Practice for Land Development • Northern Growth Management Framework • Operational activities (management of infrastructure) • Advocacy (Partnership for the North) 			
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>This option has higher risks than the proposed option in regard to the effectiveness of achieving the objectives. It does not have as much detail around the social services or infrastructure that needs to be delivered as part of the development, such as land for a school or community centre, neighbourhood parks,</p>	<p><i>Efficiency</i></p> <p>This option provides less certainty for the community, the developer and the Council than the proposed provisions. While the policies aim for similar outcomes and methods as the proposed provisions, the lack of direction creates uncertainty for the developer about whether proposals will</p>	

	<p>or community sports and recreation facilities. Nor does it have timeframes for delivery of these items.</p> <p>There is less certainty of how the objectives will be achieved. The status quo is also outdated in terms of the building standards. The status quo is not consistent with the NPS-UD as it does not allow for enough development capacity and does not include the medium density residential standards.</p>	<p>be approved by the Council and whether there will be unexpected costs along the way.</p> <p>The status quo policies and methods have been found to be difficult and confusing to use. There is often debate about whether proposals meet the policies and objectives. This has resulted in resource consent process taking longer and being more costly than it needs to be.</p>	
<u>Overall evaluation</u>	<p>This status-quo option is not appropriate. It is partially consistent with the regional and strategic objectives and policies but is not aligned with the NPS-UD and does not include the medium density residential standards, and as such is not currently consistent with all relevant direction. Whilst benefits and costs are broadly similar to the proposed approach, the approach is less efficient and effective in achieving the objectives and realising the benefits. This includes fewer social benefits due to less guidance on social infrastructure provision and potentially less housing provided as no medium density is provided for.</p> <p>The status-quo also results in higher costs for the developer due to the rule framework having more onerous consenting requirements than the proposed approach, and as such a higher cost for delivering housing and employment land within greenfield areas.</p> <p>The overall low effectiveness and efficiency of the status- quo results in it not being the preferred option to address the identified resource management issues.</p>		
Option 3: Alternative approach to provisions	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
Enable residential development across greenfield areas by zoning as medium density residential and some industrial/commercial zoning	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Land is less likely to be utilised in a cohesive and integrated manner which will result in inefficient use of greenfield land, which is a significant issue for the 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> Environmental effects will still be managed through other District Plan provisions, including in relation to SNAs and other overlays and these 	It is considered that there is certain and sufficient information on which to base the proposed policies and methods as the greenfield areas have

<p>at Lincolnshire Farm. Under this scenario there is no requirement for a Development Plan and no transitional FUZ.</p> <p><u>Policies:</u> Policy 1: Enable medium density residential development Policy 2: Enable business commercial and industrial activities at Lincolnshire Farm Policy 3: Appropriate use and development Policy 4: Manage inappropriate use and development</p> <p><u>Rules:</u> The rule framework will be largely similar to the proposed rule framework for the Development Areas in its consideration of development and land use, and will have similar bulk and location standards, including relevant medium density residential standards.</p> <p>The rules relating to proposed infrastructure</p>	<p>Wellington area due to limited greenfield sites</p> <ul style="list-style-type: none"> • No transition zone will mean that there is the potential for activities to occur within greenfield areas that would fragment them and limit their ability to provide suitable greenfield developments. • While areas protected by other District Plan provisions are still protected (for example SNAs), areas not otherwise protected may be lost during fragmented development. For example the ridgetops and natural gullies could be developed, rather than protected through identified open space areas as in the proposed provisions. • This approach provides less opportunity to consider how cumulative environmental effects will occur as a result of large-scale development and a reliance on other individual plan provisions to manage environmental effects rather than a comprehensive approach to the area. • Decision making at a consent level could be more disjointed and result in fewer benefits due to the absence of a guiding Development Plan. <p><i>Economic</i></p>	<p>can be considered through the consenting process.</p> <ul style="list-style-type: none"> • Greenfield sites will deliver additional housing and employment land. • Rural activities will not be supported in the interim, with less potential for development and land use that will fragment greenfield sites. <p><i>Economic</i></p> <ul style="list-style-type: none"> • Greater flexibility for landowners with regards to how they develop their land with no requirement for a Development Plan. • The enablement of residential and business land use activities and development within the zone will result in the delivery of housing, and subsequent employment opportunities. <p><i>Social</i></p> <ul style="list-style-type: none"> • The delivery of housing will have positive social effects, with the medium density residential zone enabling housing that could deliver a mix of typologies. • Within Lincolnshire Farm specifically there will be benefits through the enablement of business commercial and industrial activities, creating 	<p>been identified for urban development.</p> <p>However, there is a risk associated with implementing the proposed provisions in this option as they are not expected to result in efficient use of greenfield areas.</p>
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<p>provision as contained in the proposed appendices will not be included in this scenario.</p> <p>Other Methods:</p> <ul style="list-style-type: none"> • Code of Practice for Land Development • Design Guides (Subdivision, Residential and Centres and Mixed Use) • Development Contributions 	<ul style="list-style-type: none"> • Under this approach there is no requirement for a minimum density, which means fewer houses will likely be delivered with associated loss of economic realisability of land utilisation. • Whilst some employment will arise from construction phases, this could be less than the preferred option due to less control over the level of housing that will be required to be provided. <p>Social</p> <ul style="list-style-type: none"> • There is the potential that fewer houses will be delivered which will mean that identified housing needs may not be met. Similarly, this approach would likely yield less of a mix of housing typologies, which would mean potentially less affordable homes and less opportunity to provide housing for all. • With no provisions to direct the delivery of community infrastructure this approach means that there will be less cohesion between residential development and open spaces, with associated negatives for community health and wellbeing. There is risk that no community infrastructure is provided. 	<p>employment opportunities and a vibrant urban environment.</p> <p>Cultural</p> <ul style="list-style-type: none"> • No significant cultural benefits are expected to occur as a result of this approach. 	
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	<ul style="list-style-type: none"> Less certainty for community on the scale and type of development that will be delivered within greenfield areas. <p>Cultural</p> <ul style="list-style-type: none"> No specific mana whenua consideration is provided for in this approach. 		
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed alternatives are assessed to have a low effectiveness in achieving the sought outcomes. Immediately enabling urban development without any requirement for a Development Plan is expected to result in inefficient use of greenfield land. Uncoordinated development will result in the fragmentation of greenfield sites.</p> <p>It is considered that this alternative will not result in well-functioning urban environments as their will be less integration with regards to residential development, transport routes, and community facilities including open space areas. This approach also results in a reduced ability to manage cumulative environmental effects and less guided decision making.</p>	<p><i>Efficiency</i></p> <p>Overall, the approach is inefficient in achieving the greenfield development outcomes. The costs of this proposed approach outweigh the benefits, with high costs identified for the ineffective use of greenfield land, the inability to comprehensively manage environmental effects, economic costs through fewer houses delivered, and social costs due to the resulting development not meeting the sought outcome of a well-functioning urban environment.</p> <p>Identified benefits are predominantly restricted to greater flexibility for landowners on how they develop their sites. Residential and business land will still be provided under this approach, albeit less likely to be in a coordinated fashion</p>	
<p><u>Overall evaluation</u></p>	<p>This alternative approach is not an appropriate option. It does not achieve effective results in the management of greenfield areas and runs a high risk of land being developed in an ad-hoc fashion that doesn't result in high quality urban environments. Without using the FUZ and Development Plans there is limited control on the transition between rural and urban land uses, and less certainty for both the consent authority and the general public on how residential development will be delivered. The resulting consenting process will also be more lengthy and costly as there would have been no input from informative work to identify site level constraints through the Development Plan process. The resulting development, with no minimum density standard, will likely provide less residential development than the proposed approach, with subsequent reduced social and economic benefits.</p>		

12.0 Conclusion

This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

It is important that the District Plan effectively manages greenfield areas, with Wellington City having limited greenfield space to develop. As these sites can make a significant contribution to the provision of housing and business land, ensuring that high quality, integrated development is achieved across the sites and that interim land uses do not compromise their ability to provide urban development is important.

The evaluation demonstrates that the Future Urban zoning and Development Area approach is the most appropriate option as it:

- Gives effect to higher order documents, including the NPS-UD, NS-FM, and RPS, as well as other relevant National Policy Statements and National Environmental Standards.
- Incorporates and builds upon a relevant evidence base, including the analysis of the Operative District Plan and district planning practice used in exemplar and similar districts.
- Adequately assesses and responds to consultation undertaken on the draft provisions for the FUZ and Development Areas, as well as extensive processes in spatial planning and master planning.
- Addresses the identified resource management issues, in particular providing an increase in development capacity for housing and business, responding to population growth and medium-density requirements. Furthermore, it addresses the issue of housing supply as well as choice in housing type, and seeks the development of quality, well-serviced and well-connected urban neighbourhoods.
- Sets out a rule framework that ensures activities occur in accordance with objectives and policies to deliver on solutions to the identified resource management issues.
- Effectively and efficiently integrates the use of Development Areas and Development Plans for appropriate development and subdivision of future urban land.
- Identifies activity areas within Development Plans to facilitate coordinated development while providing some flexibility to achieve well-functioning urban environments.
- Establishes the most effective and efficient way to achieve the purpose of the Act and the strategic objectives of the Wellington City Spatial Plan 2021, the WRGF, and the Proposed District Plan.

This report has established that the proposed provisions have been evaluated and are the most appropriate set of provisions to achieve the proposed objectives. It is considered that the assessment of benefits and costs has sufficiently determined the satisfactory effectiveness and efficiency of the preferred provisions. Reasonable alternatives have been assessed to a similar level and have been found to be less efficient and less effective than the proposed approach.

Risks and potential alternatives have been identified, with the finding that there is low risk or uncertainty associated with the proposal. The proposed provisions set clear outcomes which have been well established through relevant higher-order directions analysed in this report.

Planning for Growth

District Plan Review

Lincolnshire Farm, Upper Stebbings and Glenside

Monitoring Report

Document Information

Version number	Author	Peer Reviewer	Date
Final and approved	Charlotta Heyd	Kate Pascall	December 2020

Executive Summary

This report provides a review of the Urban Development Areas identified in Wellington's District Plan. This is intended as an input into the review of the Urban Growth Plan and the District Plan.

The current Urban Development Area zone is to guide and manage greenfield development. There is currently only one structure plan under the Urban Development Area, being the Lincolnshire Farm Structure Plan. It is anticipated that the revised District Plan will have two greenfield Development Areas, Lincolnshire Farm and Upper Stebbings/Glenside. While this monitoring report focuses on the development and process that has so far occurred within Lincolnshire Farm, the lessons learned are also applicable to Upper Stebbings/Glenside.

The Lincolnshire Farm Structure Plan was adopted in 2006 and included in the District Plan via Plan Change 45. Resource consents since 2006 were analysed for activities and trends.

A number of internal and external meetings were held to discuss with key stakeholders what the resource management issues are in greenfield areas, how the provisions were achieving good outcomes and how they could be improved.

In summary:

- Development is slow, with only 383 dwellings built in the structure plan area since 2000.
- There are substantial physical constraints which influence where development can be located and yield of housing/development:
 - Topography – determines viability of development due to amount of earthworks needed.
 - Streams – particularly since the National Policy Statement for Freshwater 2020. Streams cannot be filled or piped without offsetting and demonstrating there are no other options.
- The current rule framework is complicated and difficult to navigate, being more onerous than other zones in the District Plan. In addition, the objectives and policies in the Urban Development Area are somewhat outdated and do not provide certainty for consent planners to understand the intended outcomes.
- There are gaps in the current provisions resulting in almost all activities within the area requiring resource consents and most dwellings being processed as a non-complying activity.
- Most of the residential lots created within the zone had consent notices placed on them for any further development to comply with the Outer Residential zone rules. Given there is already a rule in the Urban Development Chapter requiring compliance with the Outer Residential rules and a rule requiring consent under the Urban Development chapter, it has resulted in double ups that complicate the process and do not add any further value.
- Key challenge is to provide certainty through the provisions while still providing flexibility to respond to the environmental context and changing needs over time.

Purpose of this report

Wellington City Council is planning for substantial growth in the next 30 years. We are currently undertaking a review of our Urban Growth Plan and the District Plan in order to provide for this future growth as part of the Planning for Growth programme of work.

This report presents the findings of a review of resource consent data in relation to Chapter 27 (Urban Development Area Objectives and Policies) and Chapter 28 (Urban Development Area Rules) and the Lincolnshire Farm Structure Plan of the Operative Wellington City District Plan. The area to be included in the Upper Stebbings/Glenside Structure Plan is currently zoned Rural. This means there are currently no special provisions in the Operative District Plan for this area and no development has occurred here. As a result there are no consents or previous development to monitor or review for the Upper Stebbings/Glenside area.

While this monitoring report focuses on the development and process of Lincolnshire Farm, the lessons learnt will be applicable to Upper Stebbings/Glenside.

This monitoring data provides the Council with information in order to assess how the existing District Plan provisions are being implemented and how well they are achieving the intended outcomes.

Background

The purpose of the current Urban Development Area zone is to guide and manage greenfield development. It is intended that areas identified for greenfield development will also have an associated structure plan which provides a comprehensive and coordinated set of objectives and provisions for the specific area.

There is currently only one structure plan under the Urban Development Area, being Lincolnshire Farm. It is anticipated that the revised District Plan will have two greenfield Development Areas, Lincolnshire Farm and Upper Stebbings/Glenside. While this monitoring report focuses on the development and process of Lincolnshire Farm, the lessons learnt are also applicable to Upper Stebbings/Glenside. A review of the Lincolnshire Farm structure plan and implementation of the District Plan provisions was undertaken early 2020 by the Property Group Ltd. The findings of the resulting report are summarised below.

The Property Group - Evaluation of the Lincolnshire Farm Structure Plan - January 2020

The Property Group Limited (TPG) was engaged by the Council to undertake an evaluation of the existing Lincolnshire Farm Structure Plan (the Structure Plan) and Urban Development Area (UDA) chapters in Council's District Plan.

In January 2020 the first report was completed, titled Stage One: Evaluation of the Structure Plan and UDA District Plan Chapters. It identifies the following key issues:

- The rule framework is complicated and more onerous than provisions in other zones of the District Plan

- The UDA zone was intended as an interim zone, but no plan changes have yet been rolled through to rezone developed areas to standard District Plan zones, for example, to the Outer Residential Area zone
- Greater Wellington Regional Council (Greater Wellington) and Council's approaches to growth and planning provisions are not well aligned
- There is significant uncertainty over the Petone to Grenada link road, both in relation to its future, alignment and timing.

Resource consents review

Part of this report includes a review of 107 consent approvals in the Structure Plan area. The findings are recorded below:

- 107 resource consents were granted with attributes relating to non-compliance with rules under Chapter 28.
- Of the 107 resource consents granted, 17 were for changes or cancellations of conditions of previously granted resource consents
- With the exception of one resource consent for the establishment of a cleanfill, all resource consents were granted on a non-notified basis
- 22 out of 90 resource consents, excluding those for changes or cancellations of conditions of consent, had an extension under section 37 of the RMA to the standard processing timeframe
- 44 out of 90 resource consents, excluding those for changes or cancellations of conditions of consent, had a Non-Complying Activity status.

Resource consents were not notified

All but one of the consents processed under the rules in Chapter 28 of the District Plan (and correctly entered into Teamwork) were processed on a non-notified basis. This could be explained by the fact that the majority of Restricted Discretionary Activity rules under Rule 28.3 have non-notification clauses, which means that where resource consent is required under these rules, written approval and notification is not required.

It is noted that any presumption towards non-notification would not apply where resource consent was required as a Non-Complying Activity, and a significant proportion of consents (over 48%) were processed as Non-Complying Activities.

Rule framework

The wording of the rule framework in Chapter 28 of the District Plan is confusing and resource consent is required for almost any activity. In particular:

Rule 28.1.2 appears to permit residential activities including construction and additions and alterations in a small part of the Structure Plan area (being RA09, RA10 and RA11), as long as they comply with Outer Residential standards. However, Rule 28.3.3 then requires consent as a restricted discretionary activity for any residential activities including the construction, alteration or addition to dwellings. This means that if a dwelling has been consented and constructed, no alterations or

additions can be made without a resource consent. This is more onerous than in the Outer Residential Area where it is possible to construct a residential building without requiring resource consent, subject to compliance with the permitted standards

The wording of the standards and terms under Rule 28.3.3 indicate that developments in the Residential 1 zone must comply with the Outer Residential Area Standards 5.6.1 and 5.6.2 and if not, it will elevate to a Non-Complying Activity. Again, this is more onerous than in the Outer Residential Area where not meeting Standards 5.6.1 and 5.6.2 would make an activity a Restricted Discretionary Activity (subject to not exceeding the relevant standards and terms).

Consent notices

Many proposals, particularly around Mark Avenue, that required resource consent under Rule 28.3.3 or Rule 28.3.3A concurrently sought a variation or cancellation to a consent notice. This was because the original resource consent for the subdivision of the underlying site imposed a consent notice requiring compliance with the permitted bulk and location standards for the Outer Residential Area. Therefore, in some cases proposals are seeking Council permission for the same thing twice, once under the rules and once through a variation of the consent notice – both processes requiring the same thing, compliance with the relevant Outer Residential Area rules. In these cases, the consent notice does not achieve anything the rules do not already require, and the additional process adds greater consenting costs to the development.

It is noted that variation or cancellation of consent notices were seldom accurately captured in Teamwork. The implication of having consent notices on the allotment titles is that the applicant is required to seek both a land use consent for any breach of the permitted activity rules and also a variation or cancellation of a consent notice.

Unanticipated policy changes that impacted consents

The Housing Accords and Special Housing Areas Act 2013 (HASHAA) and an Environment Court decision affecting the interpretation of ground level are two discrete policy changes that had a significant impact on resource consents in the Structure Plan area. Neither of these factors could have been anticipated at the time Plan Change 45 was being prepared and are described in more detail below.

Housing Accords and Special Housing Areas Act 2013 (HASHAA)

The introduction of HASHAA and the creation of Special Housing Areas has enabled housing developments in the Structure Plan area to go through a streamlined resource consent process that is far more straight-forward than is provided for by the rules in UDA Chapter 28.

Obtaining status as a qualifying development under HASHAA means that the process for obtaining consent for land use or subdivision is under HASHAA and not the RMA. While such proposals must have regard to the purpose of the RMA and other provisions of that Act, the weight placed on those factors by decision-makers is expressly subservient to that placed on the achievement of the HASHAA's purpose. That is, the enhancement of housing supply is prioritised over the sustainable management of natural and physical resources and the anticipated outcomes of the District Plan.

Two consents have been lodged in the Special Housing Areas in the Lincolnshire Farm area:

- 133 Jamaica Drive (80 lot subdivision)

A HASHAA application for an 84-lot subdivision was received in 2016 (SR368826). The site is the 'northern gateway' to the Structure Plan area off Jamaica Drive. The consent was ready to be approved but the applicant did not agree to the draft conditions so the consent has not been issued. A new developer has now purchased this land with the intention of increasing the density to 150-175 lots, including a medium density component. The new application would not be processed under HASHAA.

- 61 Lincolnshire Road (406 lot subdivision)

An application was lodged in 2018 for bulk earthworks and 406 lot subdivision. This application has been on hold since 2018 waiting for further information from the applicant. Consent is also required from Greater Wellington Regional Council which has taken priority for the applicant. The application is ongoing.

All Special Housing Areas have now been disestablished and no new consents can be lodged under HASHAA. However, current applications with Council which can continue to be processed until September 2021 until the HASHAA Act is repealed in full.

Environment Court decision relating to ground level at the boundary

The Environment Court decision (NZEnvC163, ENV-2015-WLG-00031) changed the interpretation of the definition of ground level and where building recession planes are measured from. The result of this decision is that where a retaining wall is located on a boundary, the building recession plane is now measured from the bottom or toe of the wall. Before the decision, the interpretation was that it could be measured from the top of the wall.

The Environment Court decision was particularly relevant to sites in the Woodridge Development Area which were established through earthworks and retaining of cut and fill which had been based on the previous interpretation of the building recession plane. At least two retrospective land use consents were granted for non-compliances resulting from the change in interpretation.

Stakeholder meetings and workshops

In December 2019 and January 2020 TPG held a workshop and meetings with key stakeholders to understand how the Structure Plan and UDA chapters of the District Plan were being implemented.

Meetings were held with:

- Wellington City Council (with representatives from Place Planning, Resource Consents, Transport and Infrastructure, Transport Strategy and Open Space and Rec Planning)
- Greater Wellington Regional Council (Greater Wellington)
- The New Zealand Transport Agency (NZ Transport Agency)
- Landowners.

These discussions highlighted many issues with the Structure Plan and associated UDA chapters of the District Plan.

The issues have been grouped into seven key areas:

- Flexibility vs Certainty of the Structure Plan
- Resource consent required too often
- Earthworks

- Transport, roading and water infrastructure
- Reserves
- Alignment of Greater Wellington Regional Council and Wellington City Council
- Development contributions.

A summary of the key issues identified in these meetings is provided in the TPG Report.

Methodology

The data that was collated for the Property Group's reports in January 2020 was used for further analysis. This data includes all resource consents consented since the Lincolnshire Farm Structure Plan was adopted in 2006 until December 2019.

The data was broken down into:

- Type of consent – dwellings, adds and alts, subdivision, earthworks, etc.
- Year consented
- Activity status – discretionary, non-complying, etc.

A further desktop stocktake was undertaken to count the number of lots created and building/dwellings actually constructed.

There have also been two applications under the Housing Accords and Special Housing Areas Act 2013 (HASHAA). These are described in the Background Section above. The data has not been included in the analysis.

Further meetings with internal Council teams, the major landholder, and Greater Wellington Regional Council have also been undertaken and key points are included.

Data Analysis

A snapshot of the data is listed below:

- 111 resource consents were granted in the Lincolnshire Farm structure plan area between 2006 and 2020.
- 390 dwellings were consented over 38 resource consents.
- 607 lots were consented over 33 resource consents.
- 17 resource consents were for change or cancellation of conditions or consent notices.
- 41% (45) of consents were processed as non-complying, followed by 29% (31) processed as discretionary (restricted).
- In total, resource consent has been granted for **390 dwellings** within Lincolnshire Farm.
- Most resource consent applications are for one to two dwellings (21 for one dwelling, five for two dwellings). 13 applications were for three dwellings or more, with one application for 114 dwellings.

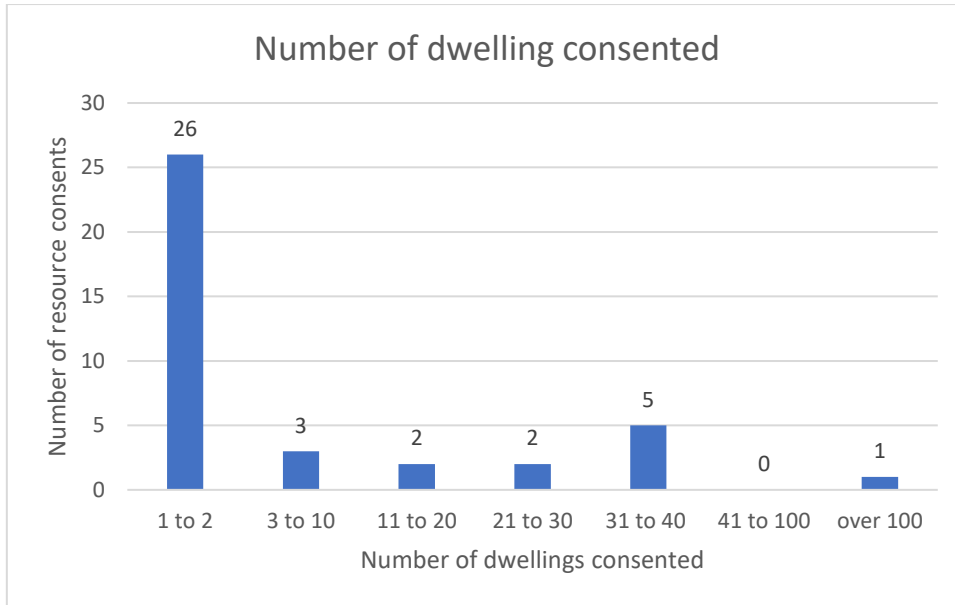


Figure 1. Number of dwellings consented by resource consents within Lincolnshire Farm

In total, resource consent has been granted for **607 allotments**. Note that this is the total number of lots, not the number of additional residential lots consented (as such, may include lots intended as roads, or balance lots). In addition, there have been a number of applications which supersede previously consented subdivisions as plans have changed.

Most resource consents were for less than five allotments, the most common being two-lot subdivisions.

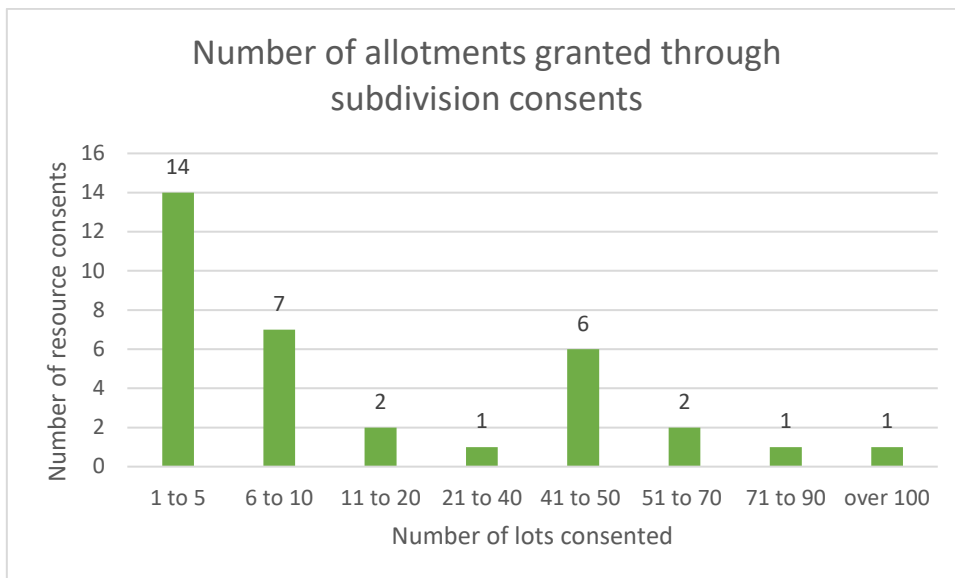


Figure 2. Number of lots consented by resource consents within Lincolnshire Farm

As shown in Figure 3, non-complying was the most common activity status, with 41 percent (44 consents) of resource consents being processed as non-complying. A relatively large proportion of consents (16 percent or 17 consents) were for changes or cancellations to conditions of resource consents or changes/cancellations to consent notices. Only two percent (two consents) were processed as controlled activities.

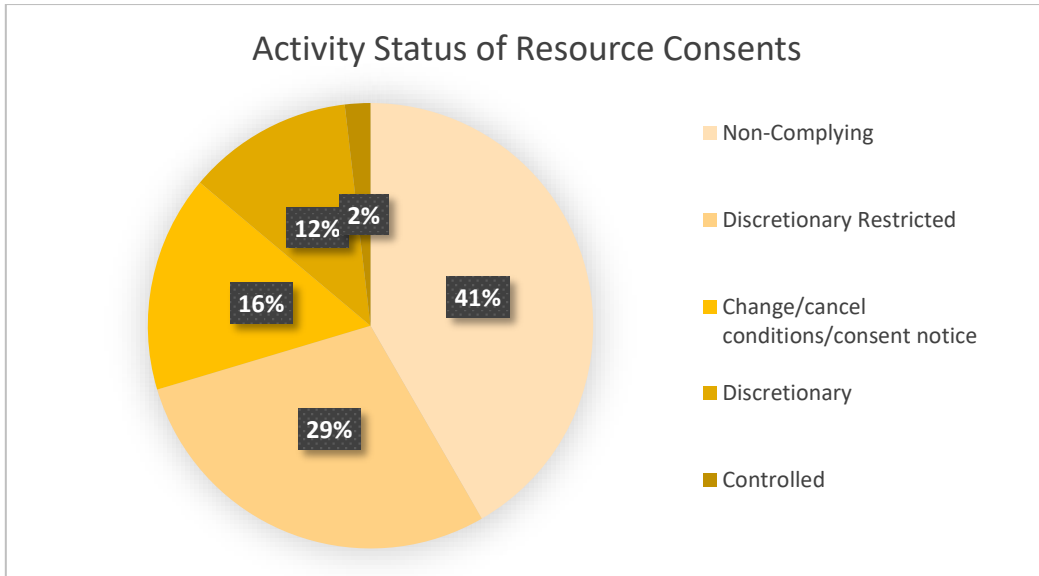


Figure 3. Breakdown of resource consents by activity status

Figure 4 shows the number of resource consents granted each year. There were a lot of applications between 2011 and 2014, after which the number has decreased, though still a steady number each year.

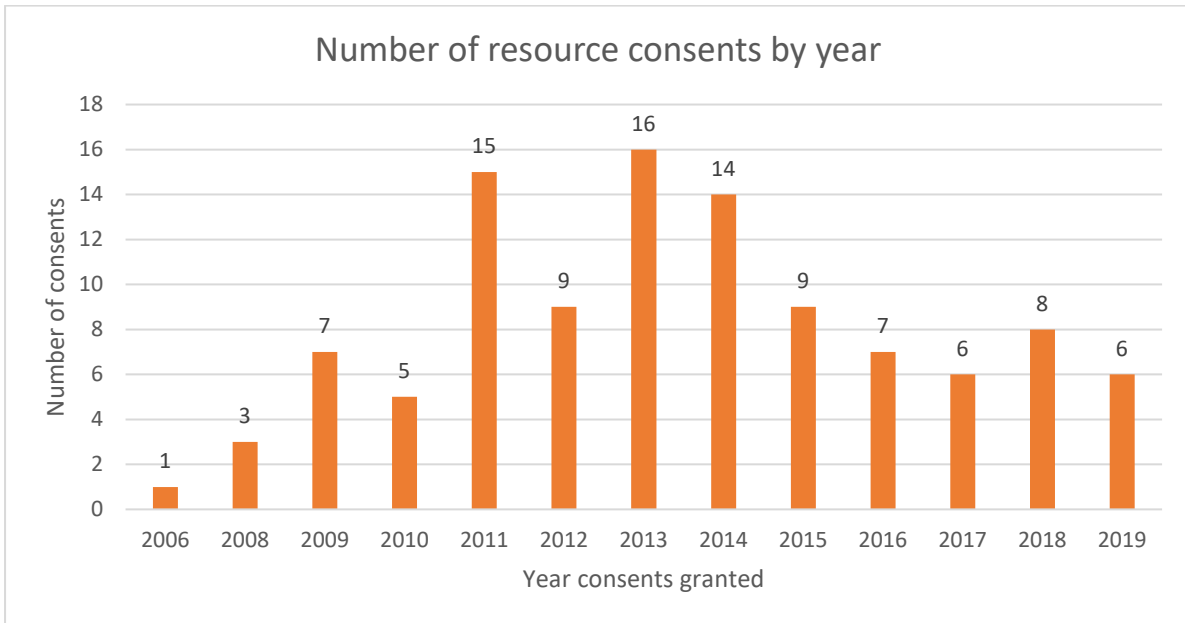


Figure 4. Resource consents by year granted

Figure 5 shows the total number of consents granted for each activity. Resource consents for dwellings were the most common consents granted. The total count of consents for the top three activities are:

- 50 resource consents for dwellings (including exclusively dwellings and dwellings combined with subdivision or other land uses).
- 34 subdivision consents (exclusive and combined consents)
- 23 consents with earthworks components.

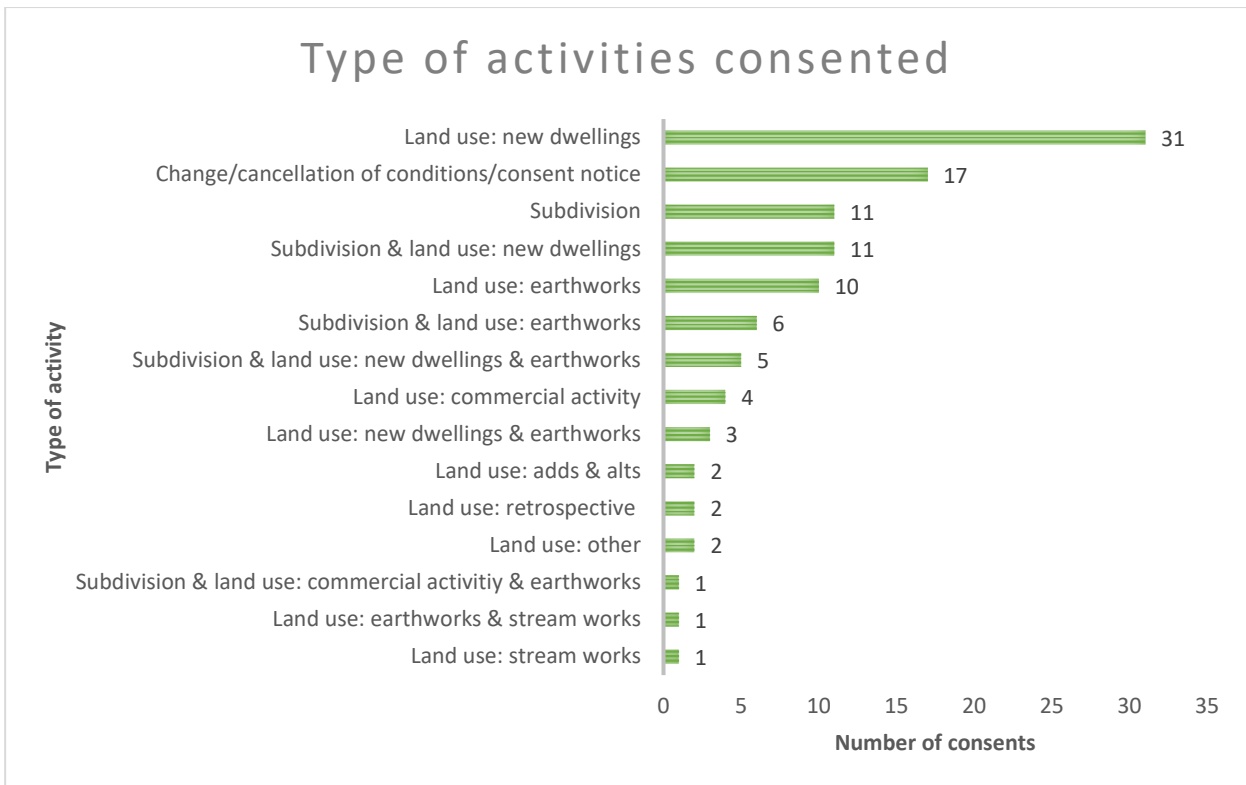


Figure 5. Breakdown of resource consents by activity type

Figure 6 and Figure 7 show the spread of resource consents over the years since 2006. The following trends have been identified:

- Most dwellings were consented between 2011 and 2014.
- The largest number of allotments approved through subdivision consents occurred between 2012 and 2015.
- A large number of changes to conditions and consent notices also occurred between 2011 and 2015.
- Since 2016 there have been fewer resource consents and fewer dwellings and subdivisions consented.

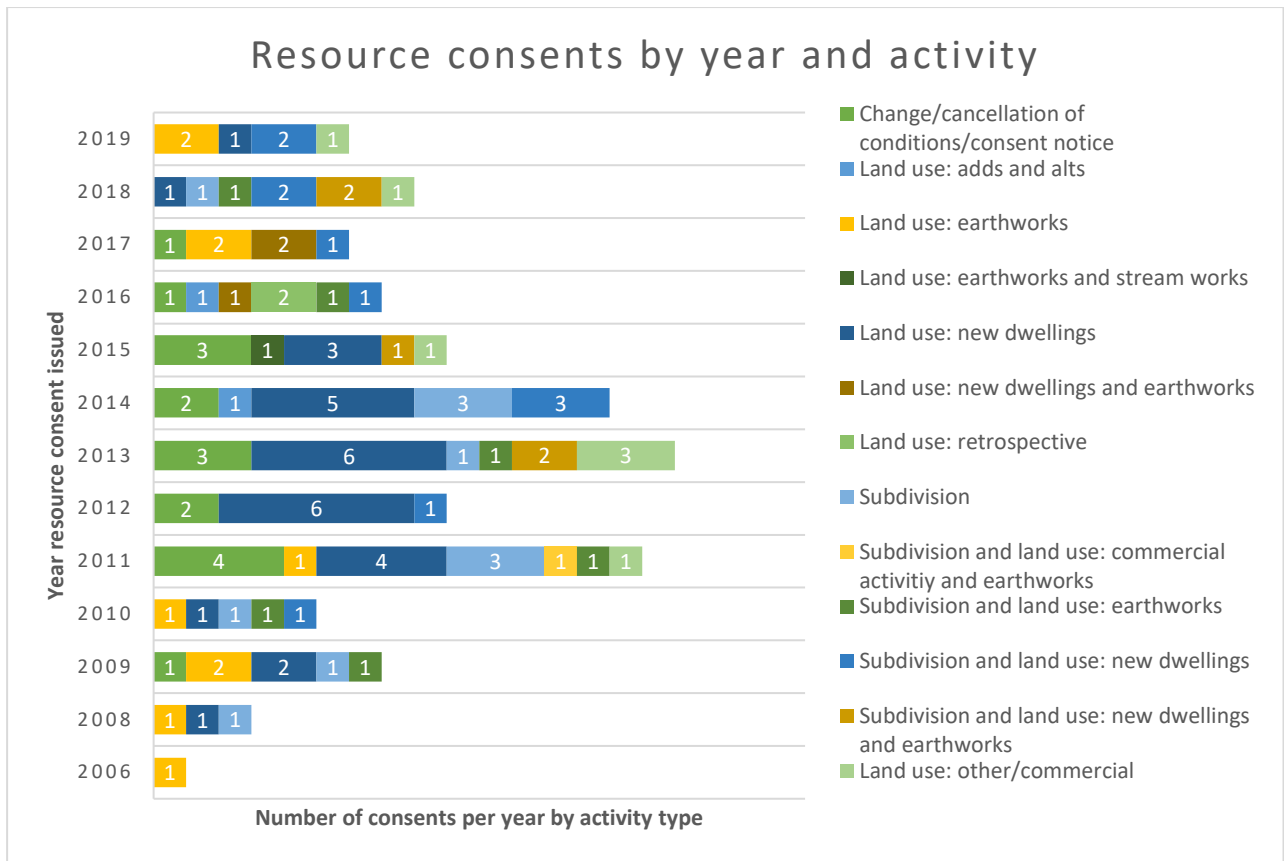


Figure 6. Breakdown of resource consents by year granted and activity type

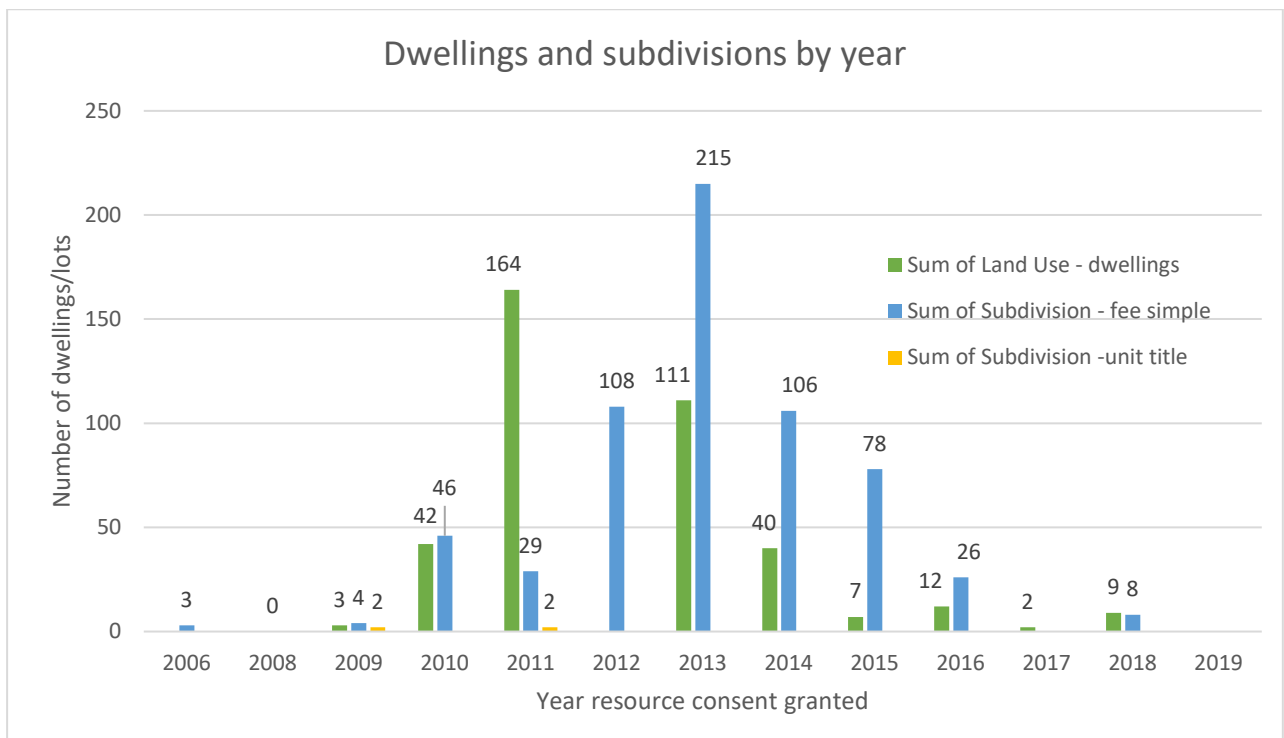


Figure 7. Breakdown of resource consents by dwellings and subdivision lots

Figure 8 shows that new dwellings are most often processed as a non-complying activity.

On the other hand, subdivision consents without a land-use component are more evenly spread across different activity status', though they are mostly processed as discretionary restricted.

Consents for solely earthworks activities are predominantly processed as discretionary.

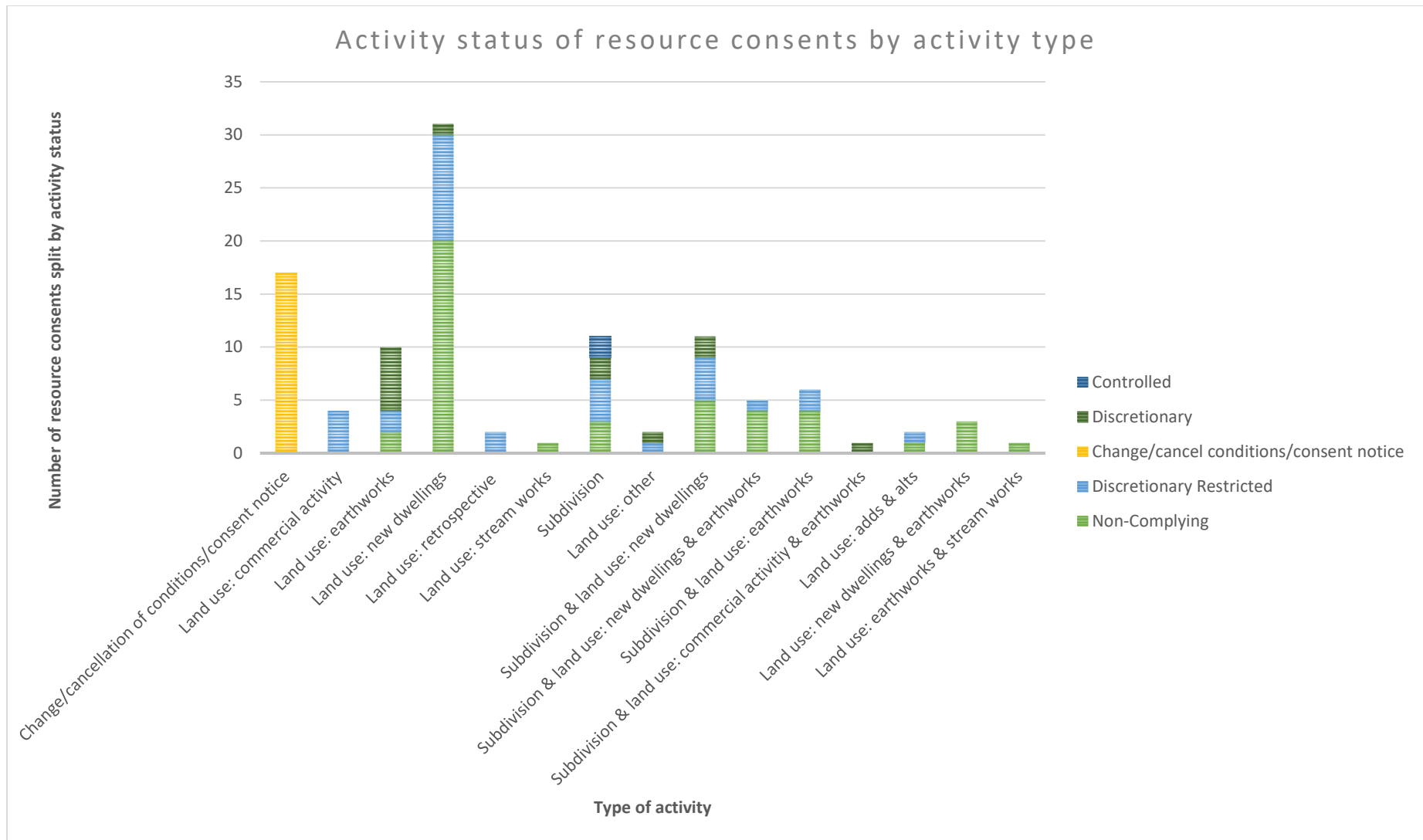


Figure 8. Activity status of resource consents by activity type

Actual development completed within Lincolnshire Farm

While many resource consents have been granted for land use and subdivision activities, not all of these have been implemented. This could be because a different plan has superseded the previously consented development, or because consents are not yet given effect to or have expired without being implemented. The map below (Figure 6) shows the current existing development on the site (as at August 2020).

The implemented development since around the year 2000 consists of:

- 383 dwellings
- 452 total parcels
- 371 contain dwellings

The built numbers show that nearly all dwellings consented have been built – 390 dwellings consented vs 383 built.

Most of the subdivisions consented have been created. There have been 623 lots consented and 546 parcels created. There has been no detailed analysis of the types of allotments consented, i.e. how many of the allotments were intended as residential lots versus roads or reserves, etc. There may also have been changes to original plans through a change of conditions which could alter the number of lots consented. As a result, the numbers should be taken as an indication.

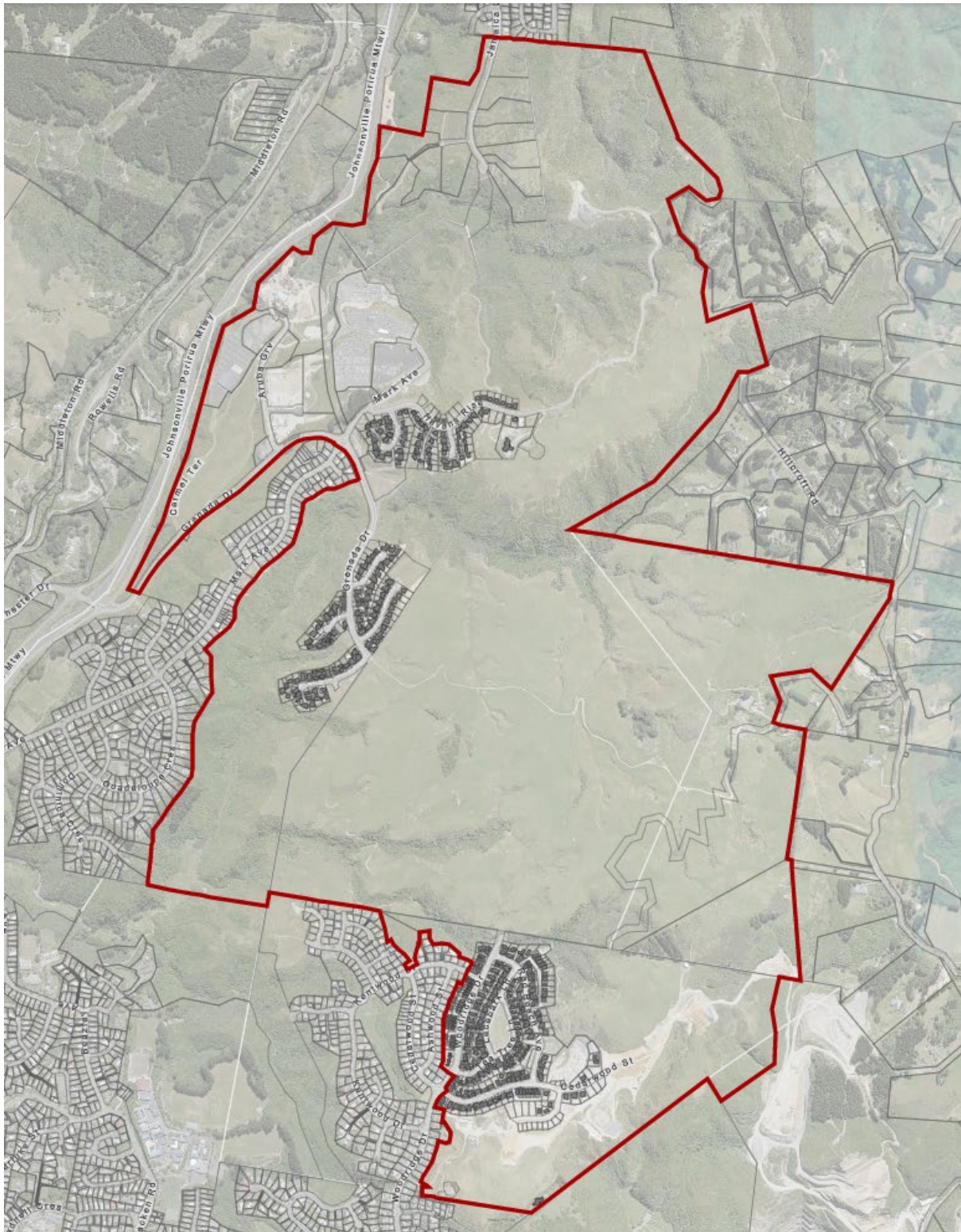


Figure 9. Map of existing development within Lincolnshire Farm (depicted by shaded building platforms and parcel outlines)

Meetings with resource consent team, developer, Greater Wellington

A number of meetings were held with interested parties, including:

- Meetings with staff from the WCC resource consents team to brainstorm resource management issues of the Lincolnshire Farm site, and to discuss potential chapter structure with consideration of the National Planning Standards and options for using different zones, Development Area overlays, and structure plans;
- Meetings with staff from urban design, parks, and resilience and building teams;
- Meetings with the Callender’s Planning consultant to discuss the resource management issues, physical planning issues comparing proposed development maps;
- Meetings with Greater Wellington.

The issues raised in these meetings are much the same as meetings undertaken by TPG in January. The main points are summarised in the table below.

Resource consents team
<i>Resource Management Issues</i>
<ul style="list-style-type: none"> • Current provisions in Chapters 27 and 28 have weak water quality provisions • NPS-FM conflicts with NPS-UD. What is the best way to give effect to both? Recent guidance from Plimmerton Farms Environment Court hearings as discussed in the Background Report. • The tension between the NPS-FM and the NPS-UD. The NPS-FM is very specific, requiring the avoidance of stream loss and protecting freshwater. It provides strong direction that traditional large cut and fill subdivision development will not be consented without incorporating protection measures for streams and waterways. • Developer will generally need to offset adverse effects of filling streams or crossing wetlands. Where and why there would be offset will be assessed carefully. There needs to be a whole ecological evaluation and calculation of the stream that is being lost/filled. • Poorly worded earthworks provisions – makes it difficult to know what is trying to be achieved. Earthworks effects can be scarring on the landscape but are necessary for major greenfield development on challenging topography.
<i>Structure Plan Issues</i>
<ul style="list-style-type: none"> • Is the size of the ‘employment/business’ area too large? • How will the District Plan ensure that development provides a mix of housing types when greenfield development in the area is predominantly a single size/style/type? • Community facilities such as schools, community centres, etc need to be provided for. • Council is trying to maximise the development potential of the land, i.e. as many houses as possible within the constraints. The economics of the development land means that developer that owns the northern end has moved to higher density. Should there be a requirement for increased density across the whole area? • The depiction of items on the structure plan appear to hold a level of certainty that perhaps was not intended and is resulting in poorer planning outcomes. For example, the areas mapped for residential activities is taken as a hard line with no residential activities (so far) being allowed outside the indicated residential areas. Whereas some residential activities might be better located outside of those boundaries given topography or connectivity to amenities. • Careful consideration of the detail provided on Structure Plan maps is required. Alongside maps, clear desired outcomes need to be specified either in objectives and policies or in the Structure Plan. • Need to update spatial planning of the Lincolnshire Farm Structure Plan as some parts do not make sense anymore, e.g. some roads will not be built where indicated due to impacts on streams.
<i>Mechanics/implementation Issues</i>

- The objectives and policies are not strong enough to turn down proposals or push for a better outcome.
- Improved subdivision guidelines are needed
 - Have serviceability written into the design guidelines and policies. For example, when a certain number of lots are created a principal/collector road to service them must be constructed.
 - Subdivision design guide is not directive enough. Needs to be strongly linked to the objectives and policies. Design guides need to be specific and strong and specify outcomes, e.g. four hours of daylight in winter.
- Maps and layout of rules is confusing given that many specific requirements sit within the Structure Plan, e.g. staging requirements.
- Most applications do not provide a detailed Development Plan which is a standard required under every rule in Chapter 29, making the application a non-complying activity. It is up to the applicant to run the risk of not providing an assessment.
- Issues with inconsistent approaches to implementation. Links to the complicated layers of the Chapters and Structure Plan and the lack of clarity and direction within them.
- Consent notices have been put on most consents, requiring compliance with outer residential rules. This has resulted in each noncompliance needing a change in variation of consent notice as well as a resource consent.

General Issues

- What kind of finance tools can be used for sequencing of infrastructure?
- Stricter rules from the NPS:FM and identified SNA areas excludes parts of the land from urban development, causing concern for developers about the viability of development.
- Hesitancy from some developers about higher densities due to perceived market demand.

Discussion and Evaluation

Review of the Development Area chapters necessary

Chapter 27 provides the context, objectives and policies for greenfield development. At the time it was introduced in 2013, only the Lincolnshire Farm Structure Plan had been developed and adopted by Council. Chapter 28 which contains the rules of the Urban Development Area zone therefore has rules specific to the Lincolnshire Farm Area. It was expected that when new structure plans were adopted then there would need to be a plan change to incorporate the new rules into Chapter 28. Given the Glenside/Upper Stebbings development is to be incorporated into the District Plan, the chapters require review regardless of the state of the provisions now.

Balance between flexibility and certainty not achieved

The balance between flexibility and certainty for Urban Development Areas has not been achieved through the current District Plan. There is not enough flexibility for the developer to implement designs that might result in better design outcomes but that may be inconsistent with the maps of the Structure Plan. With residential and employment areas being shown as well-defined areas on the Structure Plan maps – along with roads – it is difficult to apply for residential development within the employment area, even if this will work better with the overall design of the area.

There is also a question about whether the size and location of the employment area is still suitable. At the time the Structure Plan was developed, the Petone to Grenada link road (P2G) was planned by NZTA to cut through the site, which would enable easy access from the employment area to the motorway. The current uncertainty around the P2G road has pulled into question the viability of the location of the employment area. Without the access onto the P2G, service vehicles and trucks would have to drive through residential areas to access the motorway. This is an undesirable outcome.

In addition, there is a very high demand for housing in the district (and nation-wide). The current Structure Plan may not be striking the right balance between employment and residential area. An economic assessment has been commissioned to assess the demand for business land across the city in the short and long term.

Rules resulting in non-complying activity status for consents

The provisions are flawed in that resource consent applications are most commonly processed as non-complying. The rules in Chapter 28 require a “detailed Development Plan addressing the matters as specified by the structure plan” to be submitted with any application for subdivision or residential development. The intention behind this provision was to encourage applications for large scale developments. This would allow processing planners to assess the effects of the development as a whole and ensure it would be adequately serviced and achieve the outcomes specified in the Structure Plan. If a detailed Development Plan is not submitted with the application it automatically makes it a non-complying activity.

It has become normal practice for the developer to submit small-scale applications without a detailed Development Plan. These are then processed as non-complying activities and put through the RMA Section 104D gateway test (activity needs to be consistent with the objectives and policies or effects need to be less than minor). Given the broad nature of the objectives and policies, it is not difficult for applications to pass this test and subsequently be granted.

However, in processing consents without the detailed Development Plan, it has been difficult to assess the comprehensiveness and coordination of the development on site.

Gap in provisions for permitted activities resulting in onerous process

The provisions do not provide for any permitted activities. As noted in the TPG report, Rule 28.1.2 appears to permit residential activities including construction and additions and alterations in a small part of the Structure Plan area (being RA09, RA10 and RA11), as long as they comply with Outer Residential standards. However, Rule 28.3.3 then requires consent as a restricted discretionary activity for any residential activities including the construction, alteration or addition to dwellings. This means that if a dwelling has been consented and constructed, no alterations or additions can be made without a resource consent. The result is a process more onerous than the rest of the plan. For example, additions and alterations and even construction of a dwelling are permitted activities in the current Outer Residential zone, as long as there is compliance with the related standards.

The onerous process has been compounded by the practice of adding consent notices to many residential resource consents. This means for many applications, they not only need to apply for resource consent under the District Plan rules but also need to apply for a change or cancellation of a consent notice.

Development completed in parts of Structure Plan area – boundary area review required

Some parts of the structure plan area have been subdivided and dwellings constructed. These areas now have the same attributes as the surrounding Outer Residential zone (to be General Residential zone) and should be rezoned appropriately. In particular, there is the area around Woodridge, Grenada Drive, and Havana Rise where there are pockets of completed development.

Conclusions

The new chapter managing greenfield development (to be called Future Urban Zone (FUZ) under the National Planning Standards) should consider the following items:

- Where possible, locate desired outcomes in the rules and standards to ensure they are implemented.
- Provide clear performance standards for activities.
- Provide for permitted activities, taking into consideration that much of the areas will be developed prior to any Plan Change.
- Provide maps that indicate all anticipated features in approximate locations but make it clear that the locations are indicative and are subject to more detailed design work and future considerations.
- Condense the Structure Plan to simplify the content. Keep rules and standards in the chapter rather than in the structure plan. Include minimal written content in the Structure Plan.

Appendix 2: Topic relevant feedback on Draft District Plan 2021

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
2.1	Kirill Kirichai	Upper Stebbings and Glenside West Development Plan.	Seeks further elaboration of transportation networks for Upper Stebbings and Glenside West.	<p>No changes made for the following reason/s:</p> <p>The Development Plan for the area includes provisions for the inclusion of a bus route and associated bus stops, and guides the provision of walking and cycling routes through DEV3-P5.</p>
284.2	Briony Ellis	FUZ-S5 - Fencing requirements for the keeping of goats	Proposes a provision to control deer within Wellington.	<p>No changes made for the following reason/s:</p> <p>The existing provision relates to the keeping of goats within the Future Urban Zone, which the submitter seeks to be extended to include the management of deer within the zone. This is not considered to be necessary and this is addressed sufficiently in the rural chapter.</p>
494.1	John Morrison	Upper Stebbings and Glenside West-Introductory text	Seeks further elaboration on connections of Development Areas to adjacent suburbs, services and main vehicle routes. Concerned about access for public transport and active transport options. Proposes a connection from Tawa to Upper Stebbings from Greyfriars Crescent	<p>No changes made for the following reason/s:</p> <p>A connection between Upper Stebbings and Tawa was investigated during the initial scoping and investigation work in developing the Upper Stebbings and Glenside West masterplan. A road connecting the two was not feasible for a number of reasons including steep topography, insufficient Tawa connection (only local roads to connect to), impacts on SNA and ridgeline and hilltop.</p>
496.1	John Morrison	Upper Stebbings and Glenside West-Introductory text	Concerns about commitments being made about a connection for greenfield development	
496.2	John Morrison	Upper Stebbings and Glenside West-Introductory text	Seeks elaboration on connection between new development and existing suburbs to allow for quality transport systems.	
496.3	John Morrison	Upper Stebbings and Glenside West-Introductory text	Seeks an investigation into the feasibility of a connection from Greyfriars Crescent to Stebbings Valley.	

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
496.4	John Morrison	Upper Stebbings and Glenside West-Introductory text	Concerned about development in greenfield development in 'no-build' areas.	<p>No changes made for the following reason/s:</p> <p>There is clear explanation in the introductory text regarding the differences between built and no-build areas, and that there will not be houses in the no-build area. The introductory text has been improved to provide greater clarity on the purpose of these areas</p>
496.5	John Morrison	Upper Stebbings and Glenside West-Introductory text	Concerned about public transport connections in Churton Park being insufficient. Supports design guides and seeks that water sensitive design guides be followed.	<p>Changes made for the following reason/s:</p> <p>The first paragraph of the introduction provides commentary on this. However, the Development Area does not actually connect Tawa and Churton Park as stated in the paragraph.</p> <p>The paragraph has been reviewed to note the completion of Development Areas between Tawa and Churton Park (i.e., greenfield Development Areas within existing urban extent), and the area being well connected to Churton Park, SH1, the railway and nearby town centres.</p>
496.6	John Morrison	DEV3-O1: Purpose	Seeks elaboration on definition of 'well-connected'. Concerned about concentration of traffic passing through particular intersection to serve all of Upper Stebbings Valley.	<p>Changes made for the following reason/s:</p> <p>Clarification provided in the introductory paragraphs to ensure that the wording is accurate in its reflection of how the development will integrate into the existing urban areas, and it is acknowledged that there is mention within this paragraph of how the area is connected to transport links and amenities.</p>
496.7	John Morrison	DEV3-O3: Amenity and Design	Concerns that greenfield development does not support compact and accessible development.	
496.8	John Morrison	DEV3-P3: Potentially Compatible Activities	Seeks more definitive explanation and location of 'anticipated urban development'.	<p>Changes made for the following reason/s:</p> <p>Clarified the intention of this line in the policy by removing the word 'further'. Removed from both Development Area policies.</p>

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
496.9	John Morrison	DEV3-P5: Coordinated Development	<p>Concerned about concentration of traffic passing through particular intersection to serve all of Upper Stebbings Valley.</p> <p>Concerned about viability of open space recreational tracks indicated in DEV3 plan.</p> <p>Concerned about ridgelines affecting transport routes to Upper Stebbings.</p>	<p>No changes made for the following reason/s:</p> <p>Requirements in Appendix 13 mean there will two road connections to the new development. Walking network provides an indication, some of which will be expected to be provided by the developer alongside the development.</p>
496.10	John Morrison	DEV3-APP-R1: Open Spaces	<p>Concerned about the retention of open spaces, seeks early vestment to WCC to avoid loss of open space land.</p> <p>Concerned about transport connections across the Upper Stebbings Development Area.</p> <p>Seeks clarification of the size of reserves.</p> <p>Seeks acceleration of timing for neighbourhood parks.</p> <p>Land under transmission lines needs to be defined.</p>	<p>Changes made for the following reason/s:</p> <p>DEV3-APP-R1(c) amended to provide sought clarify "0.25 ha each must be provided".</p> <p>The transmission line area is in the 'unbuilt' but is acknowledged in the introduction commentary in the chapter to provide clarity.</p>
496.11	John Morrison	DEV3-APP-R2: Roads	<p>Seeks provision for connector road from Greyfriars Cres to Upper Stebbings Valley.</p>	<p>No changes made for the following reason/s:</p> <p>The policy has been amended for improved wording and clarity, but a connection between Upper Stebbings and Tawa was investigated during the initial scoping and investigation work in developing the Upper Stebbings and Glenside West masterplan and not incorporated. A road connecting the two was not feasible for a number of reasons including steep topography, insufficient Tawa connection (only local roads to connect to), impacts on SNA and ridgeline and hilltop.</p>
496.12	John Morrison	DEV3-APP-R3: Bus Services	<p>Seeks provisions for facilities to serve public transport workers and vehicles - toilets and electric charging stations.</p>	<p>No changes made for the following reason/s:</p> <p>The provisions of these facilities are not precluded, and GW were consulted in the development of the plan and did not seek to include such prescription.</p>

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
496.13	John Morrison	DEV3-APP-R5: Roads	Seeks that increased transport flows are provided for prior to DEV3 residential development.	Changes made for the following reason/s: Deletion of “being issued” from DEV3-APP-R5(a) to clarify this requirement.
496.14	John Morrison		Seeks better quality, up to date map for DEV3.	Changes made for the following reason/s: The maps have been removed from the appendices and all references updated throughout the relevant chapters. The maps are part of the District Plan planning maps
571.2	WCC Environmental Group - Lynn Cadenhead	General	Seeks addition of provisions to protect and enhance natural environment and waterways in DEV2. Opposes minimum net floor area, seeks increase.	Changes made for the following reason/s: Provision added to DEV2-P1 relate to providing protection for natural environment/ecology. SNAs have been identified in the plan and provisions drafted to protect these, but the addition in DEV2-P1 of biodiversity and natural environment being protected is considered acceptable and aligns with the outcomes for SNAs. MDRS standards have been included into the chapter, replacing the existing standards which have been deleted, along with rules linked with the general residential zone where appropriate.
571.3	WCC Environmental Group - Lynn Cadenhead	General	Opposes minimum net floor area, seeks increase.	Changes made for the following reason/s: MDRS standards have been included into the chapter, replacing the existing standards.
636.1	Heidi Snelson	General	Opposes FUZ at 395 Middleton Road (Glenside West). Concerned about public transport access to the Development Area. Concerned about noise and light spill from development and degradation of existing SNAs. Concerned about earthworks on the hilltops and ridgelines. Proposes increased protections for ridgetops and rezoning to large lot residential on the Glenside West side of the ridge.	No changes made for the following reason/s: Large lot residential and discretionary buildings are not considered consistent with the purpose of this Development Area and have not been adopted. The ridgetop area is based on the work to develop the build/no build area. General reconsideration is not considered necessary.

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
649.19	Fire and Emergency New Zealand - Beca Limited	UFD-O2	Seeks amendment of UFD-O2 to meet three waters infrastructure needs.	No changes made for the following reason/s: Development Plan areas have already been scoped for adequate servicing in general, and subdivision/Development Area requirements provide for these specific services. Three waters infrastructure is a requirement of new development.
686.1	Property Council New Zealand - Katherine Wilson	General	Supports Upper Stebbings/Glenside West as Future Urban Zone.	No changes made for the following reason/s: The submission addresses many aspects of draft district plan but in relation to greenfield areas the submitter supports the Development Areas.
722.1	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	Lincolnshire Farm: Introductory text	Opposes and seeks removal of link road from Petone to Grenada through Lincolnshire Farm.	Changes made for the following reason/s: Provisions relating to link road have been removed. The timing and commitment to the road are not certain enough to include in the District Plan.
722.2	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	Lincolnshire Farm effects standards	Seeks amendment to title banner as 'Effects Standards - Lincolnshire Farm'.	Changes made for the following reason/s: Title banner has been amended. Effects Standards relate to whole Development Area.
722.3	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV2-S15: Permeable surface area – General Residential and Medium Density Residential Activity Areas	Opposes minimum 30% permeable surface area. Seeks amendment to 20% permeable surface area in Medium Density Residential activity, given 50% site coverage.	No changes made for the following reason/s: The standards for the Development Areas are the relevant medium density residential standards.

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
722.4	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV2-S19: Outdoor Living Space for multi-unit housing – General Residential and Medium Density Residential Activity Areas	Seeks clarification for communal space minimum dimensions and how to apply them.	Changes made for the following reason/s: The medium density residential standards have now been adopted wholly for the Development Area.
724.1	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV2-APP-R2: School Site	Supports new school location in Lincolnshire Farm. Concerned about land ownership and changes to topography of the land. Seeks amendment for site to be flat 'as far as practicable'.	Changes made for the following reason/s: Reasonable to provide some flexibility given known landform. Provision amended to "a site that is flat as far as practicable, of approximately 3 ha ..."
724.2	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV2-APP-R3: Community Facilities	Supports land set aside for community facilities in Lincolnshire Farm. Concerned about land ownership and changes to topography of the land. Seeks amendment for site to be flat 'as far as practicable'.	Changes made for the following reason/s: Reasonable to provide some flexibility given known landform. Provision amended to "a site that is flat as far as practicable, of approximately 3 ha ..."
724.3	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV2-APP-R4: Open Spaces	Supports land set aside for neighbourhood park in Lincolnshire Farm. Concerned about land ownership and changes to topography of the land. Seeks amendment for site to be flat 'as far as practicable'.	No changes made for the following reason/s: The requirement is for 3 ha of the 4-6 ha to be flat field space. Sports field space does need to be flat. It is not required to be one continuous 3 ha flat area. Considered acceptable as drafted. Purchase/ownership is a matter separate to District Plan

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
724.4	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday		Generally supports Lincolnshire Farm Development Area. Suggests updates regarding road alignment and boundaries.	Changes made for the following reasons/s: The road layout has been updated to reflect consented road alignment
725.1	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday		Generally supports Upper Stebbings provisions. Seeks adjustments to extent of built areas and housing densities Concerned streams are incorrectly mapped and labelled. Proposes that the Development Area avoid dependency on connector road to Westchester Drive.	No changes made for the following reason/s: The built areas and streams identified are based on extensive investigations, analysis and ground-truthing. With the MDRS being applied, it is anticipated that the proposed density and residential standards will allow for a diverse housing typology in this area.
725.2	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	DEV3-APP-R5: Roads	Seeks requirements to construct intersection and seeks that safety audit to be removed.	No changes made for the following reason/s: While it is acknowledged that one design option has been approved, the requirement should remain in case the approved design is not the one which is implemented.
736.1	Lincolnshire Farm Ltd / Hunters Hill Ltd / Best Farm Ltd / Ohau Land and Cattle Ltd / Stebbings Farmlands Ltd - Rod Halliday	SUB-S4: Stormwater management	Seeks amendment of stormwater standards to have an exemption or permitted standard for sites upstream of the Stebbings Dam or Seton Nossitor Dam that are designed for the 1-in-100-year storm event.	No changes made for the following reason/s: Advice received from Wellington Water is that an exemption or permitted standard is not suitable.

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
1083.1	Glenside Progressive Association - Claire Bibby	General	Generally supports DEV3 but seeks major changes for Glenside West. Support SNAs for Glenside West but concerned they will not achieve appropriate protection.	<p>No changes made for the following reason/s:</p> <p>The mapping of the build area, no-build area, SNAs and open space areas are considered appropriate to reflect natural values. SNAs are protected through other chapters of the District Plan.</p> <p>Changes made for the following reason/s:</p> <p>Specific policy and rules for earthworks have been removed from the Development Area chapters and will be managed by the provisions of the earthworks chapter. The chapters explanatory text has been amended to clarify an expectation for minor earthworks only outside the build area.</p>
1083.2	Glenside Progressive Association - Claire Bibby	General	<p>Generally supports DEV3 area specific matters, particularly mixed housing approach, protection of waterways, access to open space. Upper Stebbings Valley Primary Road is well located. Opposes potential future infill in Development Area, cites effects on amenity values. Supports enforcement of principles in the proposed development layout - should not be changed by developers. Strongly supports connection to Tawa - favour graded road through upper half of Arohata Prison land. Proposes for Glenside West area to be zoned Large Lot Residential.</p> <p>Supports DEV3-APP-R4 and DEV3-APP-R5. Concerned height limits of DEV-S1 will have adverse impacts. Requests earthwork be limited in volume, so each house is required to be built on its own platform. Proposes Ridgetop Overlay be at least 20m vertically.</p>	<p>No changes made for the following reason/s:</p> <p>The standards for the Development Areas are the relevant medium density residential standards.</p> <p>A connection between Upper Stebbings and Tawa was investigated during the initial scoping and investigation work in developing the Upper Stebbings and Glenside West masterplan. A road connecting the two was not feasible for a number of reasons including steep topography, insufficient Tawa connection (only local roads to connect to), impacts on SNA and ridgeline and hilltop.</p> <p>The ridgeline and hilltop area has been removed from this location.</p>

Submission number	Submitter	Provision	Summary of Submission	Response/Changes to chapter
			Proposes amendment of Ridgelines and Hilltops Overlay.	
1083.5	Glenside Progressive Association - Claire Bibby	General	Proposes Code of Practice for developments above the Ridgelines and Hilltops Overlay.	No changes made for the following reason/s: The ridgeline and hilltop area has been removed from this location. The identified ridgetop area is within the no build area.
1088.1	Bruce White	General	Generally supports intensification growth approach. Proposes that urban boundary is relaxed, and more greenfield development allowed.	No changes made for the following reason/s: Broad submission supports relaxed regulations to increase housing competition and intensification options.
1092.5	Greater Wellington Regional Council - Matthew Hickman	General	Seeks further provision to limit effects of Lincolnshire Farms and Upper Stebbings on the surrounding areas. Proposes changing status of Development Areas to discretionary. Earthworks (R18 and R19), consider changing to discretionary for greenfield areas.	Changes made for the following reason/s: Rules R18 and R19 removed. All earthworks to be dealt with comprehensively within earthworks chapter of the District Plan. Earthworks status in Development Areas will be as for all areas.
1092.55	Greater Wellington Regional Council - Matthew Hickman	General	Seeks further provision for public transport for DEV3. Seeks amendment to map to show potential bus stops and connections.	Changes made for the following reason/s: Amendment to include the bus transport provisions in both Lincolnshire and Upper Stebbings requirements.
1092.56	Greater Wellington Regional Council - Matthew Hickman	General	Concerned about the extent to which walkable catchments ('15-minute neighbourhoods) have been considered, as well as links to public transport.	No changes made for the following reason/s: Walking catchments have been considered and are referenced in the chapter introduction. A consistent approach to walking catchments has been taken throughout the District Plan.

