

## Speaking Notes for HS1 – Michael Rachlin – Porirua City Council (PCC)

Thank you Chairs and members of the two hearing panels.

My name is Michael Rachlin and I am a Principal Policy Planner employed by PCC. For HS1 I have produced a brief statement of planning evidence in support of a number of general submission points which was intended to provide an overview on some of the main thematic concerns of PCC in relation to Change 1.

Overall, I support the direction of travel being promoted by Change 1 but consider that further clarification is required within the proposed provisions to ensure that the outcomes sought by the Regional Council are achieved.

The matters I raised in my evidence were at a high level given my understanding of the matters that were to be considered to be included within the scope of HS1. Subsequent to filing my evidence, the s42A report for HS2 has been released. I have read that report and now understand that the status of Objective A relative to other topic based objectives will be addressed as part of HS2.

I would also note that the s42A report for HS2 additionally appears to deal with two other matters I discuss in my statement of evidence. These being:

- Whether any objective(s) are intended to have primacy over another. I have interpreted the s42A report for HS2 as confirming that all objectives are intended to be read together with primacy determined on a case by case basis as derived by context (para 115 of HS2 S42A report); and
- That general submission points will be considered by other s42A reports (para 129 and para 149 of HS2 S42A report).

Given those matters will be considered in later hearing streams, I consider that the remaining issue raised in my evidence relates to the general “workability” of the Change 1 provisions. In my evidence I have used two objectives and two policies as examples of where issues may arise with interpretation and application of some of the Change 1 provisions. At a high level, I consider that the proposed provisions raise issues relating to:

- the risk of regulatory duplication between district and regional plans,
- whether the objectives are achievable within the scope of the RMA,
- how district plans, will achieve the outcomes sought by Change 1. This includes a lack of clarity resulting from the introduction of new methods and concepts that have not previously been considered within RMA processes, and the requirements to implement a number of the policies by 30 June 2025.

Finally, I also consider that the approach Change 1 takes to urban development does not fully give effect to the National Policy Statement for Urban Development. In addition to the social, economic, and cultural wellbeing provided by urban development, I have also provided two examples of how I believe urban development can contribute to reducing emissions. Although I acknowledge the need to manage adverse effects of urban development (as indeed from any development) on physical and natural resources, I consider it important that the positive effects of urban development are recognised and enabled.

Thank you.

