

**BEFORE THE INDEPENDENT HEARINGS PANELS APPOINTED TO HEAR AND MAKE  
RECOMMENDATIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON PROPOSED CHANGE 1  
TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION**

**UNDER** Schedule 1 of the Resource Management  
Act 1991 (the Act)

**IN THE MATTER OF** Hearing Submissions and Further  
Submissions on Proposed Change 1 to the  
Regional Policy Statement for the  
Wellington Region

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**STATEMENT IN RESPONSE TO MINUTE 27 BY MIKA ZÖLLNER**

**ON BEHALF OF WELLINGTON REGIONAL COUNCIL**

**HEARING STREAM 7**

**30 May 2024**

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## INTRODUCTION

1 My full name is Mika Helena Zöllner. I am a Senior Policy Advisor in Policy at Greater Wellington Regional Council (the Council).

## QUALIFICATIONS, EXPERIENCE, CODE OF CONDUCT

2 My qualifications and experience are set out in paragraphs 10-12 of my Section 42A report for Hearing Stream 7, dated 11 March 2024<sup>1</sup>. I repeat the confirmation given in that report that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

## RESPONSE TO PANEL MINUTE 27

3 Question (e) of Panel Minute 27<sup>2</sup> relates to consequential amendments regarding the Future Development Strategy (FDS) and the Wellington Regional Growth Framework (WRGF).

4 Because this matter relates to provisions in Hearing Stream 4 (urban development), I am responding to these queries through Reply as reporting officer for that topic.

5 The Panel asked the following questions:

*The Introduction text to HS4 and Policy 55 refer to the Wellington Regional Growth Framework or the Future Development Strategy. We understand that the FDS was adopted in March 2024. Can Council please advise whether it recommends any consequential amendments to the HS4 Introduction text or to Policy 55 as a result of the adoption of the FDS? We are interested in advice on consequential changes, for example:*

- i. *Can the paragraph commencing “The Wellington Regional Growth Framework provides a spatial plan...” be deleted from the Introduction;*

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<sup>1</sup> <https://www.gw.govt.nz/assets/Documents/2024/03/S42A-Report-HS7-Omitted-Submission-Points-110324.pdf>

<sup>2</sup> <https://www.gw.govt.nz/assets/Documents/2024/04/Minute-27-HS7-Response-to-Submitter-Correspondence-Councils-reply-for-HS7-and-updated-Timetabling-Directions-V2.pdf>

- ii. *Can Policy 55(b) be amended to read “it has regard to the Future Development Strategy that describes where and how future urban development will occur in that district or region” (based on the wording supported by the Officer in their Reply evidence), and*
- iii. *Does the Council consider that any consequential amendments are needed to the definition of Future Development Strategy?*

6 The FDS was adopted by the Wellington Regional Leadership Committee on 19 March 2024. This is the first FDS for the Wellington Region. It builds off and replaces the WRGF which was the previous regional spatial plan.

7 Subpart 4 of the NPS-UD 2020 requires that a FDS is prepared by all tier 1 and tier 2 local authorities every 6 years, and in time to inform the next long-term plan of each local authority. A supporting implementation plan for the FDS must also be prepared and updated annually.

8 In the Wellington Region, the FDS was prepared for all local authorities in the Wellington Region, including the Wairarapa Councils and Horowhenua District Council. This aligns with the membership of the Wellington Regional Leadership Committee and the spatial extent of the WRGF. An implementation plan for the current Wellington Region FDS is expected to be approved and published in June 2024. It is also anticipated that the FDS will be reviewed and updated in late 2025.

9 When Change 1 was notified, the WRGF was the most recent spatial plan for the Wellington Region, and it was not known when the first FDS would be approved.

10 In principle I agree that some consequential amendments could be appropriate in light of there now being an approved FDS for the Wellington Region. Because the NPS-UD 2020 directs the regular reviewing and updating of all Future Development Strategies, I consider it is likely that there will continue to be a current FDS in place going forward.

11 In terms of submissions, I note that KCDC submitted [S16.094] seeking for all references to the WRGF in Change 1 to be removed, and replaced with placeholder references to the FDS. This submission point was accepted in part. They also sought specific amendments to clause (b) of Policy 55 to refer to the FDS only [S16.040].

Removing reference to Wellington Regional Growth Strategy from Chapter 3.9 introduction

12 If the Panels would prefer that references to the WRGF are removed, I don't have concerns with this. I agree that this would assist with clarity given the WRGF has now been replaced. The FDS clearly states that, "The Future Development Strategy builds on and replaces the Wellington Regional Growth Framework 2021"<sup>3</sup>. I consider it is still useful to refer to spatial planning in the chapter introduction, so I recommend that reference to the WRGF is replaced with reference to the FDS. However, I consider the existing wording can be shortened and simplified considerably. In my view this would also make the text less likely to become out of date in future iterations of the FDS.

13 I therefore recommend that the introduction is amended as follows to improve clarity for plan users:

~~The Wellington Regional Growth Framework<sup>3</sup> Future Development Strategy provides a 30-year regional spatial plan that has been developed by local government, central government, and iwi partners in the Wellington-Horowhenua region. It sets out the key issues identified for urban growth and development and provides a 30-year spatial plan that sets a long-term vision for changes and urban development in the Wellington Region. The Wellington Regional Growth Framework identifies the three key growth corridors within the Wellington Region being the western, eastern and Let's Get Wellington Moving growth corridors.~~

14 I also recommend that Figure 3 showing the WRGF growth corridors is removed from the chapter introduction.

#### Amending Policy 55(b) to refer only to the FDS

15 I agree that the current wording of this clause is clearly a placeholder for the interim period while there isn't an FDS in place. Now that there is an approved FDS, for certainty I agree it is best for the clause to refer to the FDS only. I therefore recommend that clause (b) of Policy 55 is amended as suggested by the Panels:

(b) ~~it the proposed urban development has regard to is consistent with any the Wellington Region Future Development Strategy or, if the Future Development Strategy has not been notified, the Council's regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should will occur in that district or region, should the Future Development Strategy be yet to be released; and/or~~

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<sup>3</sup> Page 55 of the Future Development Strategy, <https://wrlc.org.nz/wp-content/uploads/2024/03/1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf>

16 For consistency, similar consequential amendments are also required to the explanation of Policy 55 (amendments shown in Appendix 1) and clause (i) of Policy 56, which I recommend is amended as follows:

(i) ~~(d) for other development rural residential, the proposal:~~

- i. ~~has regard to is consistent with any the Future Development Strategy, or, if the Future Development Strategy has not been notified, the city or district Council's regional or local strategic growth and/or development framework or strategy that addresses future rural development in that district or region, should the Future Development Strategy be yet to be released;~~ or
- ii. ~~where inconsistent with the Future Development Strategy in the absence of a framework or strategy, the proposal would~~ increase pressure for public services and *infrastructure* beyond existing *infrastructure* capacity; ~~and~~

17 I note that Policy 67 contains a similar clause to those in Policies 55 and 56 which refers to the FDS and other growth strategies, which states:

(e) implementing ~~the non-regulatory~~ actions in the ~~Wellington Regional Strategy for the Regional Focus Areas~~ Wellington Region Future Development Strategy or, the regional and local strategic growth and/or development framework or strategy that describes where and how future urban development should will occur in that district or region; and

18 Policies 55 and 56 were both notified stating that growth plans and strategies can only be considered until an FDS was in place. Policy 67 is a non-regulatory policy, so clause (e) relates to implementing non-regulatory actions in these growth strategies. For this reason, this clause never contained an 'interim' provision for the period before the FDS was released, unlike those in Policies 55 and 56. I therefore do not consider that any amendments are necessary to clause (e) of Policy 67, because I still consider it might be appropriate to implement non-regulatory actions in local district growth plans or strategies in some situations.

#### Amending definition of Future Development Strategy

19 The definition of Future Development Strategy in Change 1 currently states:

#### **Future Development Strategy**

Means any Future Development Strategy prepared and published for local authorities in the Wellington Region in accordance with Subpart 4 of the National Policy Statement for *Urban Development 2020*.

20 I consider that no amendments to the definition are required in light of the FDS being adopted. In my view the definition still accurately reflects the requirements of NPS-UD sub-part 4. The definition is generic and does not mention a specific FDS. If it was updated to refer to a specific FDS, I consider this would unnecessarily make the definition out-of-date once the current FDS is replaced by future iterations. I therefore recommend no consequential amendments to this definition.

#### Further consequential amendments

21 I do not consider any amendments are necessary to Method UD.2, which relates to the preparation of an FDS. The method is high-level and does not require updating now that an FDS for the Wellington Region has been adopted.

22 Anticipated Environmental Result 7 under Objective 22 currently states, "Actions of the Wellington Regional Growth Framework are enabled and implemented." Given the other consequential amendments recommended in response to the Panel query, for consistency I recommend that the reference to the WRGF is replaced with a reference to the FDS. I also consider it is useful to refer specifically to the FDS priorities as well as its actions, given the way that the current FDS identifies priorities for urban development. I therefore recommend AER 7 under Objective 22 is amended as follows:

Actions and priorities of the Future Development Strategy Wellington Regional Growth Framework are enabled and implemented.

## **RECOMMENDATIONS**

23 I recommend that Change 1 is amended as detailed in **Appendix 1** (indicated with purple text).

## **SECTION 32AA EVALUATION**

24 In accordance with Section 32AA, I consider that my recommended amendments to the chapter introduction, Policy 55, Policy 56, and regional form AER 7 are most appropriate

because they improve consistency and therefore clarity for plan users. This will improve the efficiency and effectiveness of their implementation.

**DATE:**

**30 May 2024**

**Mika Helena Zöllner**

**Senior Policy Advisor**

**Greater Wellington Regional Council**