

**14 October 2022**

Attn: Environmental Policy Team  
Greater Wellington Regional Council  
100 Cuba Street  
Te Aro  
Wellington

*Submission lodged via email: regionalplan@gw.govt.nz*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED PROPOSAL FOR PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**This is a submission on Proposed Change 1 (“PC1”) on the Regional Policy Statement for the Wellington Region (“the Plan” or “RPS”) from Greater Wellington Regional Council (“the Council” or “GWRC”):**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

**The specific provisions of the proposal that this submission relates to:**

PC1 in its entirety.

**This document and the appendices attached is Kāinga Ora submission on PC1.**

## The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Wellington Region (“**the region**”).
3. Kāinga Ora therefore has an interest in PC1 and how it:
  - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
  - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission is supportive of the approach taken within PC1 in relation to the following topic areas:
  - a) Incorporates the NPS-UD requirements to provide for growth in the region, but most importantly, promoting compact and concentrated urban form and densification in the region.

- b) Incorporates the National Policy Statement for Freshwater Management 2020 (“**NPS-FM**”) to manage freshwater in a way that gives effect to Te Mana o te Wai.
  - c) The inclusion of housing bottom lines to steer the level of development required within the region.
  - d) Promotes for well-functioning and quality urban environments, based around transit-oriented development and connected centres, and a centre’s hierarchy; and
  - e) Incorporates Mātauranga Māori and Te Ao Māori in the management and monitoring of indigenous biodiversity and hazard mitigation measures.
5. The Kāinga Ora submission seeks amendments to PC1 in the following:
- i. **Whole PC1** – Whilst Kāinga Ora supports the intent of PC1, in general, Kāinga Ora seeks better clarity within the objectives and policies so that they are measureable and provide direction as to how the objectives or policy can be achieved. Amendments sought and required across all of PC1.
  - ii. **Chapter 4.2** – Kāinga Ora considers that a number of policies have been worded within the chapter to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Kāinga Ora notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Kāinga Ora seek that Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with amendments and relocated to Chapter 4.1.
  - iii. **Climate Change** – Whilst Kāinga Ora supports the intent to outline the key issues relating to climate change for the region and includes provisions to ensure the Plan and Council have a response in place to managing and mitigating the effects of climate change on the use and development of the environment, Kāinga Ora seeks that the objectives, policies and methods are re-written in some instances to provide clarity and be more directive to avoid ambiguity to District Councils and Plan users.
  - iv. **Giving effect to higher order documents** – Kāinga Ora notes that PC1 includes provisions to give effect to the NPS-FM and provisions related to indigenous biodiversity, in anticipation of a new National Policy Statement on Indigenous

Biodiversity coming out. Whilst Kāinga Ora supports this, it is noted that the NPS-FM is most likely subject to change through the exposure draft and that the National Policy Statement for Indigenous Biodiversity (NPS-IB) is yet to be gazetted. Both of these higher order documents will trigger and require the GWRC to make changes to the RPS to align with these higher order documents. In some instances, PC1 seeks requirements on landowners beyond the current NPS-FM that is considered to be more onerous and restrictive. Kāinga Ora seeks that amendments to PC1 are made to align and does not go beyond what is required under the NPS-FM and NPS-IB (once gazetted).

- v. **Urban form and function** – Whilst Kāinga Ora supports PC1 giving effect to the NPS-UD, Kāinga Ora seeks that the related objectives and policies are simplified and are more directive and applicable to the Wellington Region. In particular, Objective 22 is considered a ‘plan within a plan’ in that the sub-points within the objective refer to climate change resilience and freshwater management, when these issues are provided within separate, more comprehensive chapters. In addition, the associated policies link climate change and freshwater management appropriately to the objective.

Kāinga Ora also seeks that a defined centres hierarchy is included in line with the National Planning Standards and NPS-UD. Kāinga Ora seek to identify Wellington City centre as the City Centre Zone of the region and that additional centres are identified as Metropolitan and Town Centres. These changes are requested in line with the submissions made on the District Council IPI’s and Wellington City Council Proposed Plan by Kāinga Ora to achieve regional consistency. Kāinga Ora also seeks better direction for where high density development should occur and seeks to include prescribed minimum walkable catchments.

- 6. The changes sought by Kāinga Ora are made to:
  - i. Ensure that Kāinga Ora can carry out its statutory obligations;
  - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - iv. Provide clarity for all plan users; and

- v. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1 and Appendix 2** which forms the bulk of the submission.

**Kāinga Ora seeks the following decision from the Greater Wellington Regional Council:**

That the specific amendments, additions or retentions which are sought as specifically outlined in this document and **Appendix 1 and 2**, are accepted and adopted into PC1, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Kāinga Ora wishes to be heard in support of their submission.**

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC1 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.



**Brendon Liggett**  
**Manager – Development Planning**  
**Kāinga Ora – Homes and Communities**

**ADDRESS FOR SERVICE:** *Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)*

## Appendix 1: Decisions sought on PC1

The following table sets out the amendments sought from Kāinga Ora to PC1 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as ~~strike~~through for deletion and underlined for proposed additional text.*

Table 1

ID	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>strikethrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
1.	Chapter 4.2: Regulatory policies – matters to be considered	Oppose	Kāinga Ora considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Kāinga Ora notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Kāinga Ora seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.	<ol style="list-style-type: none"> <li>That Chapter 4.2 is deleted from the regional policy statement in full.</li> <li>In the alternative that this relief is not granted, Kāinga Ora seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.</li> </ol>
2.	Chapter 4.2: Regulatory policies – matters to be considered – Policy UD.3	Support in Part	Consequential to submission point 1, Kāinga Ora does seek that Policy UD.3 within Chapter 4.2 is retained and amended as sought by this submission and relocated to Chapter 4.1.	<ol style="list-style-type: none"> <li>Retain Policy UD.3 as amended within the relief sought in this submission and relocate to Chapter 4.1.</li> </ol>
3.	Objective A	Support in Part	Kāinga Ora seeks clarity on sub point (f) of this objective to either expand on what the future pressures on climate change are or whether this sub-point can be redrafted to be more directive as per the relief sought.	<p>Amend sub-point (f) as follows:</p> <p><del>(f) responds effectively to the current and future pressures of climate change, population growth and development.</del></p> <p><u>(f) is resilient to the likely current and future effects of climate change.</u></p>
4.	Objective CC.1	Support in Part	Kāinga Ora seeks a minor change to sub point (c) so that the objective includes all planned infrastructure. It is unclear to what ‘well-planned’ means, and considers it best to remove the quantification of ‘well’.	<p>Amend Objective CC.1 as follows:</p> <p>By 2050, <u>regional and district plans contribute to</u> the Wellington Region <del>being is</del> a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</p> <ol style="list-style-type: none"> <li>sustainable air, land, freshwater, and coastal management,</li> <li>well-functioning urban environments and rural areas, and</li> <li><del>well</del>-planned infrastructure.</li> </ol>
5.	Objective CC.3	Support in Part	<p>Whilst Kāinga Ora supports the intent of the objective, Kāinga Ora is concerned how this objective would be achievable under an RMA framework. The objective would be reliant on other factors at a national level to incentivise the goals of the objective.</p> <p>Regional and District Councils are limited to new land use, subdivision and development (or renewal of discharge permits) to be able to implement any change.</p>	<p>Amend the objective to be achievable within an RMA legislative framework. The objective could be amended as such:</p> <p><del>To support the global goal of limiting warming to 1.5 degrees Celsius, net</del> <u>Net</u> greenhouse gas emissions from transport, agriculture, stationary energy, waste and industry in the Wellington Region are reduced <u>by 2030 and achieves net zero emissions by 2050.</u> ÷</p>

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				<del>(a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:</del> <del>(i) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and</del> <del>(ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and</del> <del>(iii) 60 percent reduction in public transport emissions from 2018 levels, and</del> <del>(b) By 2050, to achieve net-zero emissions</del>
6.	Objective CC.4	Support in Part	<p>Kāinga Ora seeks clarity as to how the improvement of the health and resilience of people falls within this objective. The focus of the associated policies are limited to ecosystems and the natural environment. Kāinga Ora seeks amendments.</p> <p>Kāinga Ora seek that a definition or examples of nature-based solutions are included for provide clarity.</p>	<p>1. Amend the objective to focus on the health and well-being of people. It is unclear how it will improve resilience of people. Amend the objective as such:</p> <p>Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and <u>well-being, resilience</u> of people, biodiversity, and the natural environment.</p> <p>2. Include a policy to link the health and wellbeing of people within the related policies. Otherwise the objective should remove the reference to people and the focus should be on ecosystems and the natural environment – which in turn will support, enhance and improve people’s health and well-being.</p> <p>3. Include a definition and examples of nature-based solutions.</p>
7.	Objective CC.5	Support in Part	<p>Whilst Kāinga Ora supports this objective, the objective is not measurable as to what extent permanent forest in the region is increase by.</p> <p>A definition for carbon sequestration should also be provided.</p>	<p>1. Amend the objective to become measurable as follows:</p> <p>By 2030, there is an increase in the area of <i>permanent forest</i> in the Wellington Region <u>of 10%</u>, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well- being.</p> <p>2. Include a definition for carbon sequestration.</p> <p><u>Carbon sequestration is the process of capturing, securing and storing carbon dioxide from the atmosphere through means such as maintaining, protecting and planting forest areas.</u></p>
8.	Objective CC.6	Support in Part	<p>The objective is considered too broad and is not measurable. Kāinga Ora seeks clarity as to what degree of increase is considered appropriate.</p>	<p>Amend the objective to include measurable outcomes to define what an increase of the community’s resilience is over the short, medium and long term.</p> <p>The resilience of communities and the natural environment is increased <u>to avoid loss of life and damage to property to the short, medium, and long-term due to</u></p>



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				<del>the</del> effects of climate change. <del>Improved resource management and adaptation planning by regional and district councils, including increase</del>
9.	Objective CC.8	Support in Part	Kāinga Ora supports this objective but is unsure what the outcome of the objective is. The objective is also emotive and Kāinga Ora is unsure how the objective is achievable within a RPS framework.	Amend the objective as follows:  <del>Iwi and hapū are empowered to make decisions to achieve climate resilience in their communities.</del>  <u>Land use, development and subdivision on Māori land is resilient to the likely current and future effects of climate change.</u>
10.	Objective 20	Support in Part	Kāinga Ora supports the intent of the objective, however seeks that the objective is amended to provide clarity but also recognises that natural hazard and climate change mitigation and adaptation activities are not limited to mitigation measures.	Amend the objective as follows:  Natural hazard and climate change mitigation and adaptation activities <u>do not increase</u> <del>minimise</del> the risks from natural hazards and <u>do not have an adverse effect on impacts on</u> <del>Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.</del>
11.	Objective 21	Support in Part	Kāinga Ora seeks that the objective is amended to provide clarity to provide for measurable outcomes. The words strengthened and better prepared are ambiguous.	Amend the objective to provide measureable clarity.  The resilience of our communities and the natural environment <u>is strengthened to avoid loss of life and damage to property due to the</u> <del>to the short, medium, and long-term effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.</del>
12.	Proposed amendments to Chapter 3.9: Regional form, design and function, and Objective 22	Oppose in part	Kāinga Ora seeks that chapter focuses on the regional form, design and function of the urban and rural environments. The proposed amendments and inclusions in the chapter create a ‘plan within a plan’ setting, for example, Objective 22 requires 11 matters to be met for enabling an urban development.  Amendments are sought to the proposed amendments for simplification and implementation. The RPS should be read as a whole, and there is no need to include all matters that is covered across the various chapters of the RPS into one objective. The focus should be on enabling urban development, form and function, including housing and infrastructure.	Amendments sought as outlined in <b>Appendix 2.</b>
13.	Policy CC.2: Travel demand management plans – district plans	Oppose	Kāinga Ora opposes the requirements for subdivision, use and development consent applicants to provide travel demand management plans. Kāinga Ora considers that travel management is better undertaken at a neighbourhood scale and that they are prepared by councils rather than applicants.	Delete the policy in its entirety.  <del>By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and</del>

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				<del>development a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.</del>
14.	Policy CC.3: Enabling a shift to low and zero-carbon emission transport – district plans	Support in Part	Whilst Kāinga Ora supports the intent of the policy, Kāinga Ora is concerned that the policy places significant burden on district councils to enable a shift to low and zero-carbon emission transport infrastructure in a very short period. Whilst district plans can include enabling objectives, policies and rules to support the policy’s intent, there are a number of factors that would hinge on the development of such transport options, including that councils only have jurisdiction over new development, often other reasons of resource consent are triggered such as earthworks, vegetation clearance and structures.	Amend the policy and explanation as follows:  By 30 June 2025, district plans shall include objectives, policies, rules and methods that <u>promote the construction of multi modal transport enable</u> infrastructure that supports <del>the reduction in greenhouse gas emissions uptake of zero and low-carbon multi-modal transport that contribute to reducing greenhouse gas emissions.</del>  Explanation District plans must provide a supportive planning framework (for example, <u>supportive objectives and policies permitted activity status</u> ) <u>for the reduction in greenhouse gas emmissions zero and low-carbon for</u> multi modal transport infrastructure, such as public transport infrastructure, cycleways and public EV charging network.
15.	Policy CC.4: Climate resilient urban areas – district and regional plans	Support in Part	Kāinga Ora considers that this policy can be combined with Policy CC.14 rather than referring to Policy CC.14 within the policy itself.	Amend and combine Policy CC.4 with Policy CC.14.
16.	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional plans	Support in Part	Kāinga Ora seeks clarity as to why district plans are included within this policy as offsetting is limited to regional plans.	Amend policy as follows:  <u>Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional plans</u> <del>District and regional</del> <u>Regional</u> plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.
17.	Deletion of Policy 10	Support	Kāinga Ora supports the deletion of policy 10.	Support deletion.
18.	Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan	Support	Kāinga Ora supports this policy and in particular the requirement that the Regional Land Transport Plan includes provisions that promote equitable and accessible high quality active mode infrastructure.	Retain as notified.

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19.	Policy 14 - Urban development effects on freshwater and the coastal marine area – regional plans	Support in Part	Kāinga Ora notes the NPS-FM does not prohibit the piping of rivers, but rather implements the effects management hierarchy of avoid, mitigate and remedy.	Amend sub-point (i) as follows:  (i) Require riparian buffers for all waterbodies and avoid piping of rivers <u>where practicable and where the effects cannot be avoided, they are minimised or remedied. Aquatic offsetting or compensation may be used where the piping of the river cannot be avoided, minimised or remedied.</u>
20.	Policy 15: Managing the effects of earthworks and vegetation disturbance – district and regional plans	Support in Part	Kāinga Ora seeks that this policy is separated into regional plan functions and district plan functions. Kāinga Ora considers that the policy could also be redrafted to improve readability by cascading each requirement.	1. Amend and separate the policy into regional and district plan functions. New policies will need to be created.  2. Include cascading points under the chapeau of ‘the control of earthworks and vegetation’.
21.	Policy FW.2: Reducing water demand – district plans	Support in Part	Kāinga Ora seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Kāinga Ora seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more ‘nature-based’ could be used. e.g. community rain gardens, stormwater ponds.	Amend the policy as follows:  District plans shall include policies, rules and/or methods to reduce demand of water <del>from registered water suppliers and users</del> , including where practicable: (a) provisions improving the efficiency of the end use of water <del>on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and</del> (b) <u>provisions improving the efficiency of the end use of water at a community scale for large scale developments; and</u> (c) <u>provisions requiring alternate water supplies for non-potable use in new developments.</u>
22.	Policy FW.4: Financial contributions for urban development – district plans	Oppose in part	Whilst Kāinga Ora recognise the need for financial contributions, Kāinga Ora consider that financial contributions for stormwater mitigation should be limited to the effects at point of connection for a development allotment. In addition, alternative solutions for stormwater treatment should be provided for to manage quality and quantity of stormwater within a development, which would then offset the payment of financial contributions.	Amend Policy FW.4 as follows:  District plans <del>shall</del> <u>may</u> include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent <u>for effects associated with</u> stormwater quality and quantity treatment <u>at the point of connection to the development only where off site is required</u> , as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. <u>A financial contribution will not be required where on site stormwater quantity and quality mitigation is provided to an adequate level to reduce downstream effects.</u>  <i>Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence</i>

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				<b>Explanation</b>  Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that urban new urban development pays their fair share.
23.	Policy 23	Support in Part	Kāinga Ora seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.
24.	Policy 24 - Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans	Support in Part	Kāinga Ora seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.
25.	Policy 29 - Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans	Support	Kāinga Ora supports the inclusion of a hazard and management hierarchy to manage the effects of hazards on subdivision, use and development.	Retain as notified.
26.	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans	Support in Part	In line with the Kāinga Ora submissions on the IPI Plan Changes of the district councils of the Wellington Region, Kāinga Ora seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions and the national planning standards.	Amend the policy as follows:  District plans shall include policies, rules and/or methods that enable and manage a range of land use activities, <u>including high density residential living</u> that maintain and enhance the viability and vibrancy of: <ol style="list-style-type: none"> <li>1. the regionally significant <del>central business district of</del> Wellington City <u>centre</u>;</li> <li>2. <del>other regionally significant centres</del> <u>The Metropolitan Centres of:</u> <ol style="list-style-type: none"> <li>(i) <u>Johnsonville</u></li> <li>(ii) <u>Kilbirnie</u></li> <li>(iii) Upper Hutt <u>Centre</u></li> <li>(iv) Lower Hutt <u>Centre</u></li> <li>(v) <u>Petone</u></li> <li>(vi) Porirua</li> <li>(vii) Paraparaumu</li> <li>(viii) Masterton</li> </ol> </li> <li>3. The <u>Town Centres</u> <del>locally significant centres</del> of:               <ol style="list-style-type: none"> <li>(i) <del>Kilbirnie</del>;</li> <li>(ii) <u>Mirimar</u>;</li> <li>(iii) <u>Newtown</u>;</li> <li>(iv) <u>Tawa</u>;</li> <li>(v) <del>Petone</del>;</li> <li>(vi) <u>Naenae</u></li> <li>(vii) <u>Waterloo</u></li> <li>(viii) <u>Mana</u>;</li> <li>(ix) <del>Johnsonville</del></li> </ol> </li> </ol>

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				<p>(x) Ōtaki (<del>Township</del>);</p> <p>(xi) <u>Ōtaki (Main Road)</u>;</p> <p>(xii) <u>Paraparaumu Beach</u>;</p> <p>(xiii) <u>Raumati Town</u></p> <p>(xiv) Waikanae;</p> <p>(xv) Featherston;</p> <p>(xvi) Greytown</p> <p>(xvii) Carterton; and</p> <p>(xviii) Martinborough</p> <p><b>Explanation</b></p> <p>Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region <del>for which district plans must maintain and enhance their vibrancy and vitality</del>. The centres identified are of significance to the <u>Wellington</u> region's <u>to achieve a well-functioning urban environment and compact form that provides many employment opportunities, is well-served by public transport and has a high demand for housing and business activities for economic development, transport movement, civic or community investment</u>. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. <u>Development and intensification of these areas will achieve a regional form that will contribute to meeting the objectives and policies of the RPS associated with climate change and land-use and transportation integration. It is also important for their prosperity and resilience in the face of social and economic change</u>. Wellington City centre <del>The regional central business district</del> is the major centre in the Wellington region; the other key centres also provide significant business, retailing and community services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.</p>
27.	Policy 31: Identifying and enabling a range of building heights and density	Support in part	<p>In line with the Kāinga Ora submissions on the IPI Plan Changes of the district councils of the Wellington Region, Kāinga Ora seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions and the national planning standards.</p> <p>Kāinga Ora also considers that the policy as notified does not add any additional value than what is stated within the NPS-UD and therefore seeks better direction for where high density development should occur and within prescribed minimum walkable catchments.</p>	<p>Amend Policy 31 as follows:</p> <p>District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and <u>intensification density</u> within <i>urban areas</i> where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning <i>urban environments</i>, including as a minimum:</p> <p>(a) <i>For any tier 1 territorial authority, identify areas for high density development within:</i></p>

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				<p><u>i. As much capacity development capacity as possible to maximise the benefits of intensification within the Wellington City Centre and at least a 15-20 minute / 1200m-1600m walkable catchment from the edge of the City Centre Zone;</u></p> <p><u>ii. Building heights of at least 6 storeys and density of urban form to reflect demand for housing and business use within the Metropolitan Zones and at least 10-15min/800m-1200m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;</u></p> <p><u>iii. Within and adjacent to the town centres, building heights of at least 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least a 5-10 min/400-800m walkable catchment from the edge of the Town Centre Zones.</u></p> <p><del>(i) City centre zones and metropolitan centre zones; and</del></p> <p><del>(ii) any other locations, where there is with good access to:</del></p> <ol style="list-style-type: none"> <li><del>1. existing and planned rapid transit;</del></li> <li><del>2. edge of city centre zones and metropolitan centre zones; and/or</del></li> <li><del>3. areas with a range of commercial activities and community services.</del></li> </ol> <p><del>(b) For any tier 1 territorial authority, identify areas for medium density residential development within any relevant residential zone.</del></p> <p>(c) For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where:</p> <ol style="list-style-type: none"> <li>(i) there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/or</li> <li>(ii) there is relative demand for housing and business use in that location.</li> </ol>
28.	Policy 32	Support	Kāinga supports the amendments to Policy 32.	Retain Policy 32
29.	Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration	Support in Part	Kāinga Ora supports Policy UD.3 but seeks additions to strengthen unanticipated or out of sequence developments.	Amend Policy UD.3 as follows:  When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the



ID	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>strikethrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
			<p>In addition, Kāinga Ora seeks that the policy also includes the need to prioritise intensification within existing urban environments prior to considering urban expansion via greenfield development.</p>	<p>following criteria is met:</p> <ul style="list-style-type: none"> <li>a) <u>The development is not inconsistent with the Council’s strategic outcomes as set out in any Future Development Strategy, or development framework / strategy that describes where and how future urban development should occur, should the Future Development Strategy not yet be released. This includes the prioritisation of intensification of existing urban areas.</u></li> <li>b) the location, design and layout of the proposal: <ul style="list-style-type: none"> <li>i. contributes to establishing or maintaining the characteristics and qualities of a well-functioning <i>urban environment</i> identified in Policy 55(a)(ii) and Objective 22,</li> <li><del>ii. well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,</del></li> <li>ii. <u>is well connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors and/or have access to existing or planned rapid transit stops; and / or</u></li> <li>iii. <u>provides for resilience to the effects of climate change and support reductions in greenhouse gas emissions.</u></li> <li><del>iv. for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development;</del></li> </ul> </li> <li>c) <u>The development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as the proposal makes a significant contribution to meeting a need</u> identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for: <ul style="list-style-type: none"> <li>i. <del>a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format</del> <u>a variety of homes that meet the needs of different households in terms of type, configuration, price, and/or location;</u></li> <li>ii. <u>a variety of homes that enable Māori to express their cultural traditions and norms;</u></li> <li>iii. business space or land of a particular size or locational type, or</li> <li>iv. community, cultural, health, or educational facilities, and</li> <li>v. the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</li> </ul> </li> <li>d) when considering the significance of the proposal’s contribution to a matter in (b), this means that the proposal’s contribution:</li> </ul>

ID	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>struckthrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
				<ul style="list-style-type: none"> <li>i. is of high yield relative to either the forecast demand or the identified shortfall,</li> <li><del>ii. will be realised in a timely (i.e., rapid) manner,</del></li> <li><del>iii. is likely to be taken up, and</del></li> <li><del>iv. will facilitate a net increase in district-wide up-take in the short to medium term,</del></li> <li>ii. <u>will likely be realised in a manner earlier than the anticipated land release sequence; and /or</u></li> <li>iii. <u>supports, and limits as much as possible adverse impacts on, the competitive operation of land and development markets.</u></li> </ul> <p>e) required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.</p>
30.	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in Part	Kāinga Ora seeks that this policy is amended to be in line with the NPS-FM and NES-F.	<p>Amend policy to be in line with the NPS-FM and NES-F:</p> <p>(b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 100m <del>setback margin</del> of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream for the purpose of protecting wetlands</p>
31.	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments – non-regulatory	Support	Kāinga Ora supports the wording in this policy identifying urban design guidance as non-regulatory.	Retain as notified.
32.	Method 4: Consideration – resource consents, notices of requirement and when changing, varying or reviewing plans	Support in Part	Kāinga Ora considers that reference to resource consents and notices of requirement is moot within this method given that the implementation within a regional or district plan would then filter through to resource consents and notices of requirement.	<p>1. Amend method as follows:</p> <p>Method 4: Consideration – <del>resource consents, notices of requirement and when</del> changing, varying or reviewing plans</p> <p>Policies 35 to 60, IM.1, IM.2, CC.9, CC.10, CC.11, CC.12, CC.13, CC.14, FW.5, IE.2, UD.2 and UD.3 will be implemented, where relevant, <del>when considering a resource consent, notice of requirement, or</del> when changing, varying or reviewing a district or regional plan.</p> <p>2. Undertake any consequential changes as requires to reflect the amendment to the title of this method.</p>
33.	Method CC.3	Oppose	Kāinga Ora consider the method unnecessary to state within the context of the RPS	Delete the method in its entirety.




ID	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>struckthrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
34.	Methods 23 and 25	Support	Kāinga Ora supports the deletion of these methods.	Retain as deleted.
35.	Method UD.1: Development manuals and design guides	Support	Kāinga Ora support that design guidance is stipulated as a non-statutory method. Kāinga Ora seeks that development manuals and design guides should not be a requirement, but only implemented where considered appropriate by District Councils as non-statutory documents.	<p>Amend the method as follows:</p> <p>Prepare the following development manuals and design guidance <u>when considered appropriate by district councils as non-statutory documents</u>:</p> <ul style="list-style-type: none"> <li>(a) Urban design guidance to provide for best practice urban design and amenity outcomes in accordance with Policy 67(a);</li> <li>(b) Papakāinga design guidance that are underpinned by Kaupapa which is Māori in partnership with Mana Whenua in accordance with Policy 67(f); and</li> <li>(c) Urban design guidance and development manuals to assist developers in meeting Policy CC.14 and Policy FW.3.</li> </ul> <p><i>Implementation: Wellington Regional Council and city and district councils (via the Wellington Regional Leadership Committee)</i></p>
36.	Consequential amendments to monitoring Objective 22	Support in part	Consequential to the changes sought to Objective 22 (see <b>Appendix 2</b> ), Kāinga Ora seeks changes to the Anticipated environmental results (AER).	<p>Amend AER as follows:</p> <p>1. District plans:</p> <ul style="list-style-type: none"> <li>(a) contain policies, rules and/or other methods that encourage a range of land use activities to maintain and enhance the viability and vibrancy of <u>Wellington City Centre, the Metropolitan Centres and the Town Centres</u> <del>the regionally and locally significant centres, including the regional central business district;</del> and</li> <li><del>(b) identify and contain policies and methods to enable a range of building heights and density, including high and medium density development.</del></li> <li>(c) <u>identify and enable urban intensification, including building heights and built form density:</u> <ul style="list-style-type: none"> <li><u>i. As much capacity development capacity as possible to maximise the benefits of intensification within the Wellington City Centre and within at least a 15-20 minute / 1200m-1500m walkable catchment from the edge of the City Centre Zone;</u></li> <li><u>ii. Building heights of at least 6 storeys and density of urban form to reflect demand for housing and business use within the Metropolitan Zones and at least 15min/800m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;</u></li> <li><u>iii. Within and adjacent to the town centres, building heights of at least 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least within a 10 min/400-800m walkable catchment from the</u></li> </ul> </li> </ul>

ID	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>strikethrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
				<u>edge of the Town Centre Zones.</u>
37.	Definitions - General	Support in Part	Kāinga Ora seeks that definitions are aligned with any relevant National Policy Statements or the National Planning Standards where applicable.	Amend definitions so that they are aligned with any relevant National Policy Statements or the National Planning Standards where applicable.
38.	Definition – Carbon emissions assessment	Oppose	Consequential to the relief sought within this submission, Kāinga Ora seeks the deletion of this definition.	Delete the definition in its entirety.
39.	Definition – City centre zone	Oppose in Part	Consequential to the relief sought within this submission, Kāinga Ora seeks that the definition is amended to reflect the centres hierarchy proposed within Policy 30, recognising Wellington City as the only City Centre within the context of the RPS.	Amend the definition as follows:  <del>Has the same meaning as in Standard 8 of the National Planning Standards: Areas used predominantly for a broad range of commercial, community, recreational and residential activities. In the context of the Wellington Region, the City Centre Zone is that of Wellington City.</del> The zone is the main centre for the district or region.
40.	Definition – regionally significant centres	Oppose	Consequential to the relief sought within this submission, Kāinga Ora seeks that the definition is deleted to reflect the centres hierarchy proposed within Policy 30.	Delete definition in its entirety.
41.	Definition – Urban areas	Support in Part	Kāinga Ora seeks that the definition is amended to include open space zones.	Amend the definition as follows:  The region’s urban areas include residential zones, commercial, mixed use zones, <u>open space zones</u> and industrial zones <u>identified in the District Plans of the Wellington Region.</u> <del>city, Porirua city, Lower Hutt city, Upper Hutt city, Kāpiti coast and Wairarapa combined district plans.</del>

## **Appendix 2: Amendments sought to Chapter 3.9: Regional form, design and function**

*Proposed changes are shown as ~~strike~~through for deletion and underlined for proposed additional text.*

Amend the chapter introduction as follows:

Chapter introduction	
<p>Regional form is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces, and networks work well for <u>mana whenua / tangata whenua and communities</u>, and are environmentally responsive.</p> <p><u><i>Well-functioning urban environments</i></u></p> <p>The concept of well-functioning <i>urban environments</i> was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning <i>urban environment</i>. <del>A compact and well designed regional form</del> <u>Well-functioning urban environments</u> enhances the quality of life for residents as it is easier to get around, allows for a greater <u>supply and choice</u> of housing close to where people work or to public transport, <del>town centres are and provide vibrant, safe, and cohesive centres that enhance business activity. is enhanced. Energy consumption and carbon emissions are also reduced.</del> <u>Well-functioning urban environments enable</u> <del>Communities and businesses are to be</del> more resilient to <u>the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region.</u> <u>Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance.</u> Well-functioning <i>urban environments</i> are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS. <del>oil shortages or crisis, and there is reduced pressure for new infrastructure and more efficient use of existing infrastructure.</del></p> <p><u><i>Commercial Centres</i></u></p> <p><del>The</del> Central Wellington city contains the central business district for the <u>whole</u> region. Its continued viability, vibrancy and accessibility are important to the whole region. There are also a number of <del>other regionally significant centres that are</del> <u>metropolitan centres that are</u> an important part of the region's form <u>and centres distribution</u>. <del>These are the sub-regional city centres of Upper Hutt city centre, Lower Hutt city centre, Porirua city centre, Masterton town centre, Paraparaumu town centre, and the suburban centres in Petone, Johnsonville and Kilbirnie.</del> These centres are significant areas of transport movement and civic and community investment. They also <del>have the potential to</del> support new development and increase the range and diversity of activities <u>across the region</u>. Good quality <u>high and medium density housing in and around these centres, and existing and planned rapid transit stops, would provide increased housing choice and affordability.</u> <u>Further medium and high density development must be enabled within the fast-growing districts of the Region, being those identified in the National Policy Statement for Urban Development as tier 1 territorial authorities.</u> If this development occurs, it will further <u>improve housing affordability and provide for additional housing choice across the region.</u> <del>could increase housing choice and the use of services and public transport.</del></p>	

Encouraging use and development of existing centres of business activity can also lead to social and economic benefits. Additional local employment around these centres ~~could~~ also can provide people with greater choice about where they work and live in the region. The ~~physical arrangement~~ design of urban and rural communities/smaller centres, the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to well-functioning urban environments and ~~a compact and well designed~~ regional form.

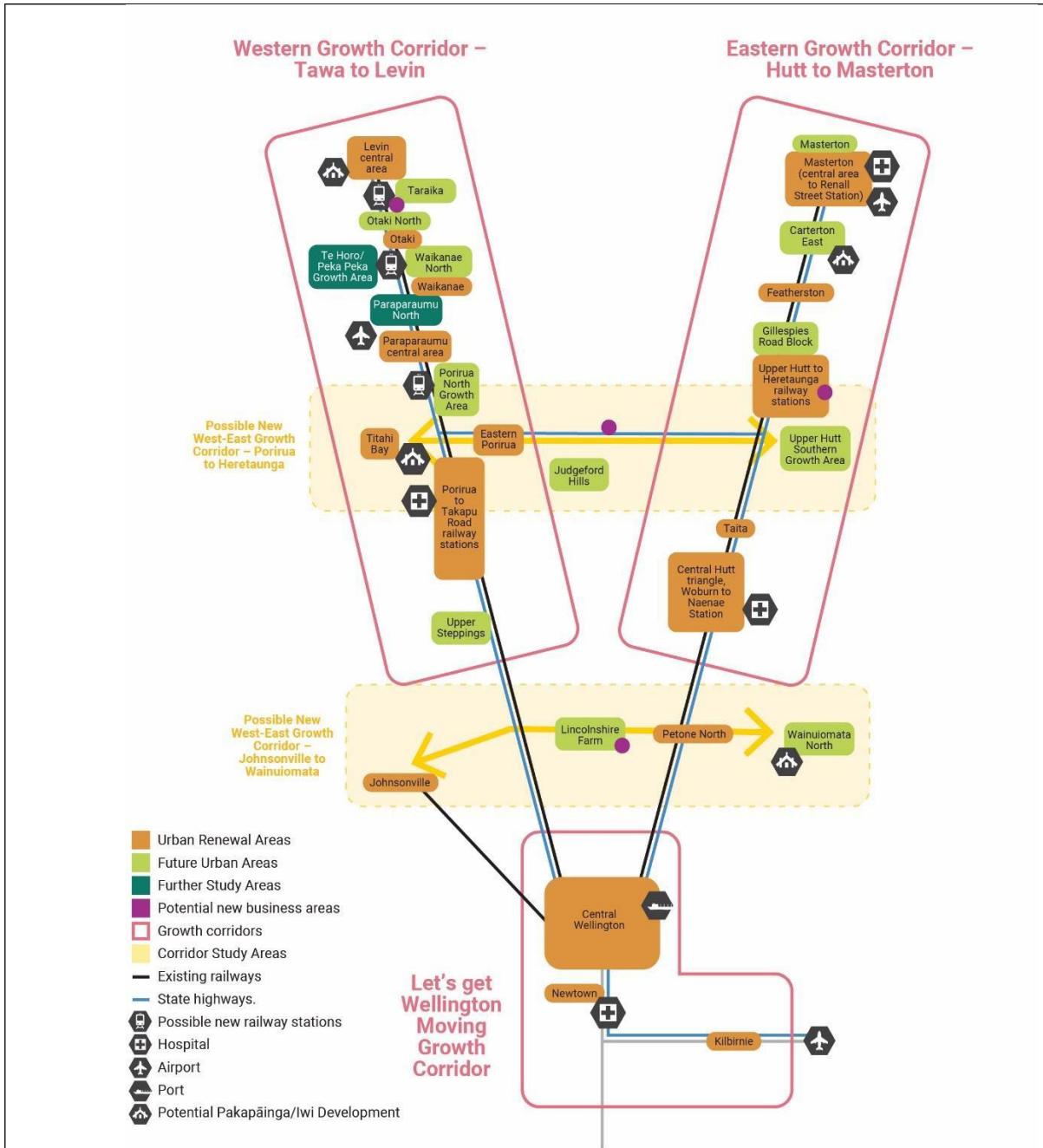
### *Regional growth and urban development*

The Wellington Regional Growth Framework<sup>3</sup> provides a 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 region has a strong corridor pattern, yet is generally compact. 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. Two additional potential west-east corridors are identified. The corridors are shown in Figure 3 below.

~~The transport corridor pattern includes State Highway 1 and the North Island Main Trunk rail line which enters the region near Ōtaki and extends southwards through Kāpiti Coast, Pukerua Bay, Porirua and northern Wellington and through to Wellington city central business district. State Highway 1 continues through to Wellington International Airport. State Highway 2 and the Wairarapa railway line enter the region north of Masterton and extend southwest through Wairarapa, the Hutt valley and on to merge with State Highway 1 and the North Island Main Trunk rail line at Ngauranga. State Highway 58 provides a vital the current east-west link between State Highways 1 and 2.~~

This corridor pattern is a strength for the region. It reinforces local centres, supports passenger transport, reduces energy use and makes services more accessible.



**Figure 3: Wellington Regional Growth Framework corridors**

The region is facing growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by around 195,000 people by 2051. As of May 2022, district plans within the Greater Wellington region, does not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.

In more and more areas of the region, housing is unaffordable for many people. Across the region the average rent per week increased by 24 percent between 2018 and 2021

and the average house price increased by 46 percent between 2018 and 2021<sup>4</sup>. The ratio of house values to annual average household income has been steadily increasing as house prices have risen without equivalent rises in incomes. For instance, the ratio for Wellington City as at March 2021 was 6.7<sup>5</sup>. Home ownership and access to affordable housing issues are exacerbated for Māori; 43 percent of Māori living in the Wellington region were living in owner occupied dwellings compared to 55 percent of the overall population<sup>6</sup>.

National direction provided through the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 supports increased supply of housing ~~that includes a range of housing typologies and sizes to assist in meeting the housing needs of the region. affordable housing.~~ Both legislative documents direct urban intensification and development in around the urban environments, centres and existing and planned rapid transit stops, subject that there are no qualifying matters limiting development.

~~However, high levels of development without suitable constraints risks undermining other characteristics and qualities of a well-functioning urban environment. We need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, values of significance to mana whenua/ tangata whenua and management of the coastal environment.~~ Most of the region, including its existing urban areas, has significant exposure to multiple natural hazards, and there is continuing demand to build in coastal and/or natural hazard-prone areas.

Medium and high-density development that is enabled through national direction has the potential to ~~be reduced by Councils' identifying qualifying matters in their District Plans that will result in less enabled development capacity and growth across the region result in poor urban design outcomes, in the absence of sufficient design guidance.~~ Development pressure can reduce transport efficiency and limit the ability of all centres to provide community services and employment.

There are, however, parts of the region where growth pressures exist and where the region's current compact form is beginning to fray at the edges, reducing transport efficiency and the ability of some centres to grow as community service and employment areas. The region also has limited east-west transport linkages, which means freight and commuter movements are focused along the north-south corridors, increasing congestion on some major routes.

In certain locations, the region's urban design has also been weakened by poorly designed developments which negatively affect the look, feel, health, safety, vitality and vibrancy of those areas. The region's form, design and function have been examined by the region's nine local authorities, in conjunction with the region's iwi authorities, central government and business, education, research and voluntary sector interests, as part of the development of the Wellington Regional Strategy (2007), a sustainable economic growth strategy for the Wellington region. The Wellington Regional Strategy focuses on leadership and partnership, growing the region's economy and good regional form. It is recognised that



the region's form is a key component to making the Wellington region 'internationally competitive'.

### Regionally significant issues

The regionally significant issues and the issues of significance to the Wellington region's territorial authorities and iwi authorities for regional form, design and function are:

~~A.~~

#### 1. Lack of housing supply and choice

The Wellington Region lacks sufficient, affordable, and quality (including healthy) housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. There is a lack of variety of housing types and sizes across the region, including papakāinga and medium and high density residential living in and around centres and existing and planned transit nodes. All of which impacts housing affordability in the region. Housing affordability has declined significantly over the last decade, causing severe financial difficulty for many lower-income households, leaving some with insufficient income to provide for their basic needs and well-being. There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments.

#### 2. Lack of infrastructure

There is a lack of supporting infrastructure and sufficient infrastructure to enable the development of housing and provision of quality urban environments. Enabling housing requires infrastructure, both physical and social infrastructure to support well-functioning urban environments. Physical infrastructure includes roading and three-waters infrastructure. Social infrastructure includes community facilities and services, and open spaces. Territorial Authorities, network utility operators and infrastructure providers are encouraged to continue providing the additional infrastructure needed to meet the needs of current and future communities.

~~B.~~

#### 3. Inappropriate land use, activities and development

Inappropriate and poorly managed urban land use and activities in parts of the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. This has also led to poor quality urban environments. Clear direction is needed to where land-use and development is appropriate and where it is not appropriate.

#### ~~1. ——— Poor quality urban design~~

~~Poor quality urban design can adversely affect public health, social equity, land values, the cultural practices and wellbeing of mana whenua / tangata whenua and communities, the vibrancy of local centres and economies, and the provision of, and access to, civic~~



~~services. It can also increase the use of non-renewable resources and vehicle emissions in the region.~~

~~2. Sporadic, uncontrolled and/or uncoordinated development~~

4. Out of sequence development

~~Out of sequence Sporadic, uncontrolled and/or uncoordinated,~~ development (including of infrastructure) can adversely affect the region's compact form and function. This can, among other things, result in:

- (a) new development that is poorly located in relation to existing infrastructure (such as roads, public transport, water supply, sewage and stormwater systems) and is costly or otherwise difficult to service
- (b) development in locations that restrict access to the significant physical resource in the region – such as *aggregate*
- (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities
- (d) insufficient population densities to support public transport and other public services
- (e) development in locations that undermine existing centres and industrial employment areas
- (f) loss of vitality and/or viability in the region's central business district and other centres of regional significance
- (g) displacement of industrial employment activities from established industrial areas
- (h) adverse effects on the management, use and operation of infrastructure from incompatible land uses under, over, on or adjacent.
- (i) adverse effects on mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.

~~3.~~

5. Lack of Integration of land use and transportation

A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in:


- (a) increased *emissions* to air from a variety of pollutants, including *greenhouse gases*
- (b) increased use of energy and reliance on non-renewable resources
- (c) reduced opportunities for alternate means of travel (such as walking and cycling), increased community severance, and increased costs associated with upgrading roads
- (d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient and safe

- operation of the transport network
- (e) inefficient use of existing infrastructure (including transport orientated infrastructure).

Amend Table 9 as follows:

Table 9: Regional form, design and function objective and titles of policies and methods to achieve the objective



Objective	Policy Titles	Page	Method Titles	Implementation (*lead authority)	Page
<p><b>Objective 22</b> </p> <p><u>Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well- functioning urban environments, which:</u></p> <p>(a) <u>Are compact and well designed; and</u></p> <p>(b) <u>Provide for sufficient development capacity to meet the needs of current and future generations; and</u></p> <p>(c) <u>Improve the overall health, well-being and quality of life of the people of the region. ;and</u></p> <p><del>(d) <u>Prioritise the protection and enhancement of the</u></del></p>			<p>Changes to these made through Appendix 1.</p>		

Objective	Policy Titles	Page	Method Titles	Implementation (*lead authority)	Page
<p>quality and quantity of freshwater; and</p> <p><del>(e) — Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and</del></p> <p><del>(f) — Support the transition to a low emission and climate resilient region; and</del></p> <p><del>(g) — Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and</del></p> <p><del>(h) — Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and</del></p>					

Objective	Policy Titles	Page	Method Titles	Implementation (*lead authority)	Page
<p>(i) <del>Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and</del></p> <p>(j) <del>Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and</del></p> <p>(k) <del>Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.</del></p> <p>A compact ...</p>					

