

**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 OF SUPPLEMENTARY EVIDENCE OF LOUISE RUTH  
ALLWOOD**

**ON BEHALF OF WELLINGTON REGIONAL COUNCIL**

**HEARING STREAM 3 - CLIMATE CHANGE – TRANSPORT**

**15 August 2023**

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## TABLE OF CONTENTS

INTRODUCTION.....	3
QUALIFICATIONS AND EXPERIENCE .....	3
RESPONSES TO EXPERT EVIDENCE .....	3
Policy CC.1.....	4
Optimise transport demand definition.....	10
Walkable catchment definition.....	11
Policy CC.2.....	12
Travel Choice Assessment Definition.....	18
Method CC.3 .....	19
Policy CC.9.....	19
Policy CC.3.....	22
Policy CC.10.....	23
Policy CC.11.....	26
Carbon emission assessment definition .....	29
Policy 9 .....	30
Policy EIW.1.....	30

## INTRODUCTION

- 1 My full name is Louise Ruth Allwood. I am a Planning Technical Lead at GHD Limited.
- 2 I have read all the evidence submitted in relation to Hearing Stream 3. The following evidence is relevant to Climate Change – Transport topic:
  - 2.1 Kāinga Ora – Homes and Communities (Kāinga Ora), Victoria Woodbridge (#158)
  - 2.2 Peka Peka Farm Limited (PPFL), Maciej (Mitch) Wiktor Lewandowski (#118)
  - 2.3 Wellington International Airport Limited (WIAL), Claire Hunter (#148)
  - 2.4 Porirua City Council (PCC), Rory Smeaton (#30)
  - 2.5 Waka Kotahi New Zealand Transport Agency (Waka Kotahi), Catherine Heppelthwaite (#129)
  - 2.6 Winstone Aggregates, Phillip Wayne Heffernan (#162)
  - 2.7 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council (UHCC), Suzanne Rushmere (#34)

## QUALIFICATIONS AND EXPERIENCE

- 3 My qualifications and experience are set out in paragraphs 18 – 20 of my s42A report for this topic, dated 31<sup>st</sup> July 2023. I repeat the confirmation given in that report that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

## RESPONSES TO EXPERT EVIDENCE

- 4 This rebuttal evidence responds to submitter evidence in relation to the provisions in this topic and associated definitions. The recommended amendments to the Change 1 provisions in my section 42A report are shown in ~~red underlined~~ below and further recommended amendments in this rebuttal evidence are shown in ~~blue underlined~~. All recommended amendments within this evidence are included as Appendix B to this evidence.
- 5 My s42a report has incorrect referencing throughout as all fields weren't updated prior to publishing. I have provided the correct reference in this report where needed.

## Policy CC.1

- 6 Policy CC.1 is addressed in the evidence of Kāinga Ora, WIAL, PCC, Waka Kotahi, UHCC and PPFL. A number of submitters have proposed further amendments to Policy CC.1 and these are set out in **Appendix A** of this evidence.

### Kāinga Ora (Submitter 158)

- 7 Ms Woodbridge states there are issues with Policy CC.1 in how it is drafted. This issue was not raised in Kāinga Ora's original submission. Ms Woodbridge raises the following issues, the direction it provides in relation to the location of development and the heading and chapeau i.e. reduction of greenhouse gas emissions associated with transport infrastructure<sup>1</sup>. Ms Woodbridge considers the policy as amended in response to submissions duplicates the definition of optimise transport demand and she is of the opinion the definition of 'optimise travel demand' could be deleted<sup>2</sup>.

### WIAL (Submitter 148)

- 8 Ms Hunter states it is not appropriate for this policy to apply to land-based activities at the airport which support aviation use (e.g. aircraft parking stands at the airport) and proposes amendments to explanatory text<sup>3</sup>.

### PCC (Submitter 30)

- 9 Mr Smeaton<sup>4</sup> considers three key changes should be made to Policy CC.1:
- 9.1 'Altered' is deleted and replaced with 'upgraded' due to the term 'altered' capturing a broad range of activities that would be inappropriate for the policy to be applied to e.g. maintenance and repair activities and other minor changes.
  - 9.2 The definition of optimise transport demand and the three additional clauses essentially say the same thing and so the definition over complicates the policy application. He suggests that clauses (a) to (c) of the policy are removed and the definition of optimise demand is relied upon instead.

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<sup>1</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.8

<sup>2</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.10

<sup>3</sup> HS3 S148, WIAL, Hunter, paragraph 68

<sup>4</sup> HS3 S30, PCC, Smeaton, paragraphs 33-39

- 9.3 The location of development is more appropriately addressed within the urban development provisions and recommends amendments to Policy CC.1 to remove reference to ‘providing for, and concentrating, development’.

Waka Kotahi (Submitter 129)

- 10 Ms Heppelthwaite considers further amendments are required to Policy CC.1 to modify the chapeau to remove duplication within the body of the policy, to refer to transport infrastructure supporting development (not delivering development) and amendments to part (c) to provide for the wide range of infrastructure and the nature of development it may address (e.g. rural/ urban)<sup>5</sup>. Subsequently the definition of optimise transport demand would then not be necessary as it is addressed within the body of Policy CC.1. If this definition is retained then Ms Heppelthwaite recommends amendments to the definition.

UHCC (Submitter 34)

- 11 Ms Rushmere considers the proposed amendments do not address the concerns in UHCC’s original submission (being no legislative support for this policy, scale and significance issues and the ability to implement the policy is wholly reliant on the provision of funding). Ms Rushmere raises the following concerns with the amendments to Policy CC.1:
- 11.1 the policy wording implies that all travel demand increases greenhouse gas emissions,
  - 11.2 it is inappropriate to include a hierarchical approach when many measures are complementary rather than hierarchical, and
  - 11.3 amendments are beyond the ability of the district plan to implement.
- 12 Ms Rushmere does not see a benefit in the addition of the definition of optimising transport demand and considers it is unclear how existing space could be utilised to remove the barriers to walking and cycling<sup>6</sup>.

PPFL (Submitter 118)

- 13 Mr Lewandowski considers further amendments are necessary to Policy CC.1 as the hierarchy approach as proposed is problematic, as it is included by reference as part of

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<sup>5</sup> HS3 S129, Waka Kotahi, paragraph 7.1

<sup>6</sup> HS3 S34, Waka Kotahi, Rushmere, paragraphs 169-174

Policy 55<sup>7</sup>. In his opinion Policy CC.1 duplicates some of the matters which Hearing Stream 4 will address in relation to the location of development, and the policy doesn't recognise the role of greenfield development in providing for capacity issues.

#### Analysis and recommendations

14 After considering the matters raised and amendments proposed by the submitters, I make the following assessment and conclusions.

15 I note the concerns raised by submitters that Policy CC.1 as redrafted within Appendix 2 of my section 42A report may be challenging to interpret. In their original submissions, a number of submitters advised that they did not understand what 'optimise transport demand', 'maximise mode shift' or 'efficient transport network' meant when applying Policy CC.1. In my view, these terms were difficult to articulate in a simple way. To that end Policy CC.1 was amended to articulate in a practical way what those terms mean, and in my view as drafted does this in a better way than the majority of alternative wording proposed in submitter evidence.

16 I do acknowledge the effort to assist in simplifying Policy CC.1 by Ms Woodbridge and Ms Heppelthwaite. In particular, I agree with some of the suggested amendments proposed by Ms Heppelthwaite<sup>8</sup>, i.e. simplifying the chapeau of Policy CC.1 is helpful to remove the reference to 'maximise mode shift' and 'efficient transport network', as optimising transport demand as articulated in (a) to (c) is maximising mode shift. I also agree with the removal of 'efficient transport network' for a similar reason, in addition to this being a legislated requirement through the Land Transport Management Act.

17 However, in my view the structure of the policy should remain with clauses (a) to (c) and I don't agree the reference to the hierarchy should be removed, as discussed below at paragraph 20. In my view, given the extent of confusion over the notified version of Policy CC.1 the definition of optimising transport demand is necessary to support the understanding of this term and concept. As a result I do not agree that the definition of optimise transport demand is redundant as Policy CC.1 now articulates 'optimise transport demand' in my view, in a clearer way.

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<sup>7</sup> HS3 S118, PPFL, Lewandowski, paragraph 5.24-5.26

<sup>8</sup> HS3 S129, Waka Kotahi, paragraph 7.1

- 18 Mr Smeaton<sup>9</sup> suggests replacing 'altered' with 'upgrade'. He states 'upgrade' would remove the focus on activities such as smaller repairs and maintenance activities. As discussed at paragraph 172 in my s42A report, I would anticipate smaller scale activities such those Mr Smeaton describes would likely be a permitted activity and therefore not require a resource consent. In saying that, there is a need for incremental change to occur to transport infrastructure as it will take the transport network time to respond and to be updated. I therefore don't agree 'altered' should be replaced with 'upgrade'.
- 19 I also do not agree definitions for 'transport infrastructure' or 'altered' are required. A definition for transport infrastructure is discussed in my s42A report at pages 13 and 14 and the reasons why I don't consider one necessary are discussed at paragraph 81. As I would anticipate definitions for terms such as 'altered' would be more appropriately defined within district plans, I don't consider it appropriate that it would sit within an RPS. With regards to Mr Smeaton's<sup>10</sup> suggestion of referring to 'land transport infrastructure' to reducing some of the uncertainty of the term, I agree this would be a useful addition to provide further clarification on the policy application and doing so further reduces the need for a definition. I note Mr Smeaton makes similar comments regarding Policy CC.11 which I discuss at paragraph 95 below.
- 20 With reference to the hierarchical approach and specifically the concerns raised regarding the location of development within clauses (a) to (c), I agree the location of development and transport infrastructure are intrinsically linked and interconnected, i.e. in simple terms you cannot undertake one without the other. I also agree where development is located spatially is more appropriately addressed within Hearing Stream 4. However, a link between the spatial location of development and the provision of transport infrastructure, in my view, is still necessary within Policy CC.1 as it reflects the need to reduce trip length or travelling distance. My understanding is this is the first fundamental principle of optimising transport demand. I therefore consider the hierarchy as expressed within Policy CC.1 necessary and it should remain.
- 21 I note that several submitters now seem to prefer the notified version of Policy CC.1 within PC1 with some additional amendments, and additionally they now appear to better understand the terms 'optimise transport demand' and 'maximise mode shift' and how this

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<sup>9</sup> Paragraphs 33 and 34

<sup>10</sup> Paragraph 95

is applied'<sup>11</sup>. They consider stripping back the policy is required to simplify the drafting so it better aligns with the notified version in PC1. In my view, the amendments proposed by Mr Lewandowski and Mr Smeaton over-simplify the policy and are therefore open to ambiguity in interpretation and application. In my opinion, the amendments proposed by Ms Rushmere misunderstand the purpose and intent of the policy in that its primary focus or starting point is on 'new and altered transport infrastructure' and not the 'management and use of land'.

22 The amendments proposed by Ms Hunter to the explanation of the policy are set out below.

*'This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities'.*

23 I agree this provides further clarification that this policy doesn't apply to those activities located on the ground which support aircraft/aviation use e.g. aircraft parking stands at the Airport. As previously stated in paragraph 174 of my s42A report, this would be consistent with Section 5R of the Climate Change Response Act 2002, which provides a deadline of 31 December 2024 for a decision about whether the 2050 target should be amended to include emissions from international shipping and aviation and if it is to be amended and how. In my view it would be beneficial to provide additional clarity by adding 'e.g. aircraft parking stands at the airport' to provide some context.

24 In conclusion, of the amendments proposed by submitters within **Appendix A** of this evidence, I consider the concerns raised by submitters regarding the reference to 'providing for, and concentrating, development' in the policy wording lean too much into directing the spatial location of development and are valid. I recommend these words are removed. The spatial location of development will be addressed in Hearing Stream 4 and by a separate suite of provisions. I also agree the chapeau of the policy can be simplified and I agree with WIAL that the policy explanation should be clarified. I set out my recommend amendments below. I address submitter evidence in relation to the associated definitions optimise transport demand and walkable catchment at paragraphs 26 to 33 of my rebuttal evidence. The amendments I propose to Policy CC.1 are:

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<sup>11</sup> Concerns were raised in original submission points from, for example, PCC [S30.025] and UHCC [S34.025], that these weren't clear.



**Policy CC.1: Reducing greenhouse gas emissions associated with transport demand and infrastructure – district and regional plans**

District and regional plans shall include objectives, policies, rules and/or methods that optimise transport demand by requiring all new and altered land transport infrastructure to be is designed, constructed, and operated in a way that contributes to an efficient transport network, maximises mode shift, and reduces greenhouse gas emissions by giving effect to a hierarchical approach (in order of priority), by:

(a) Optimising overall transport demand;

(b) Maximising mode shift from private vehicles to public transport or active modes; and

(c) Supporting the move towards low and zero carbon modes.

(a) Supporting Providing for, and concentrating, development in locations to minimise travel distances between residential, employment and the location of other essential services in combination with the delivery of multi-modal transport networks and infrastructure to serve developments; then

(b) Supporting Providing for and concentrating development within walkable catchments of public transport routes where practicable, and utilising existing space to remove barriers for access to walking, cycling and public transport; then

(c) Where Pproviding new infrastructure or capacity upgrades on the transport network to prioritise walking, cycling and public transport, such as improved or new bus and cycle lanes and measures to prioritise the need of pedestrians, cyclists and public transport above the car.

**Explanation**

This policy requires transport infrastructure planning (including design, construction and operation) to consider and choose solutions that will contribute to reducing greenhouse gas emissions: by applying a hierarchy to all new or altered transport infrastructure that supports an efficient transport network, influences travel demand through ensuring development occurs in locations that can be best served by public transport and other low and zero-carbon transport modes. The hierarchy supports behaviour change through mode shift from private vehicles to public transport or active modes. This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities e.g. aircraft parking stands.

## Section 32AA evaluation

- 25 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy CC.1 are the most appropriate as these are largely minor further amendments to better align with Objective CC.3 of Change 1. The amendments provide for greater clarity and simplify its readability. They also remove some of the duplication/tension with provisions e.g. 'Providing for, and concentrating' which are to be addressed within Hearing Stream 4. The outcomes sought by the policy remain the same. I consider the amendments to Policy CC.1 will not add additional environmental or economic cost to the community. The social benefits will remain the same.

### **Optimise transport demand definition**

#### PCC (Submitter 30)

- 26 Mr Smeaton generally agrees with the definition of optimise transport demand but considers it could be improved by minor amendments as set out below<sup>12</sup>.

*Optimise transport demand means:*

- (a) Influencing demand spatially and reducing trip length; then*
- (b) Creating choices to travel via sustainable modes and reduce emissions; then*
- (c) Design and deliver subdivision, use and development in a way that supports sustainable modes and an efficient transport network.*

#### Waka Kotahi (Submitter 129)

- 27 Ms Heppelthwaite suggests the definition for optimise transport demand is not necessary<sup>13</sup>. Suggested amendments are however provided to it as set out below.

*Optimise transport demand means:*

- (a) Influencing demand spatially and enabling reduced~~ing~~ trip length; ~~then~~*
- (b) Creating choices to travel via sustainable modes and reduce emissions; ~~then~~*
- (c) Design and deliver transport infrastructure ~~development~~ in a way that supports sustainable modes and an efficient transport network.*

#### Kāinga Ora (Submitter 158)

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<sup>12</sup> HS3 S30, PCC, Smeaton, paragraphs 96-97

<sup>13</sup> HS3 S129, Waka Kotahi, Heppelthwaite, paragraph 8.0(c)

28 Ms Woodbridge recommends the definition of optimise transport demand should be deleted due to the duplication between the definition of 'optimise transport demand' and Policy CC.1<sup>14</sup>.

#### Analysis and recommendations

29 Mr Tindall discusses the proposed amendments to the definition of optimise transport demand in paragraphs 50 to 54 of his rebuttal evidence, which I am relying on. I am of the opinion that a definition of 'optimise transport demand' is still useful to assist in the interpretation and application of Policy CC.1. With regard to the submitter recommended amendments to 'reduced' trip length in clause (a), I consider this improves readability. I do not agree with the removal of 'then' at the end of each clause as this word provides for the tiered approach in the hierarchy.

30 With regards to the proposed amendments to clause (c), as discussed in paragraph 20 of this rebuttal statement, transport infrastructure and development are intrinsically linked and as 'optimise transport demand' is referenced in both Policy CC.1 and Policy CC.9, I recommend clause (c) refers to both transport infrastructure and development. I therefore recommend the below amendments to the definition.

#### **Insert New Definition – Optimise transport demand**

##### Optimise transport demand means:

(a) Influencing demand spatially and reduceding trip length; then

(b) Creating choices to travel via sustainable modes and reduce emissions; then

(c) Design and deliver transport infrastructure and development in a way that supports sustainable modes and an efficient transport network.

#### **Walkable catchment definition**

##### PCC (Submitter 30)

31 Mr Smeaton notes the definition of walkable catchment may be problematic where a district plan has already been varied by the Intensification Planning Instrument and does not already define the term, and that this should be further addressed in Hearing Stream 4<sup>15</sup>.

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<sup>14</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.10

<sup>15</sup> HS3 S30, PCC, Smeaton, paragraph 99

### Kāinga Ora (Submitter 158)

32 Ms Woodbridge notes the definition of walkable catchment is more appropriately addressed within Hearing Stream 4<sup>16</sup>. I do not disagree with this, however because this term was introduced within the provisions of this topic and it is to be heard before Hearing Stream 4 it was subsequently defined as part of the proposed amendments to Policy CC.1 and Policy CC.2.

33 I agree with the issue raised by Mr Smeaton and recommend the proposed amendments below. Any further amendments to the definition of walkable catchment will be addressed collectively within Hearing Stream 4.

#### **Insert New Definition - Walkable Catchment**

A walkable catchment is an area that an average person could walk from a specific point to get to multiple destinations. A walkable catchment consists of a maximum 20 minute average walk, or as otherwise identified defined by territorial authorities in district plans.

### **Policy CC.2**

34 Policy CC.2 is addressed in the evidence of Kāinga Ora, WIAL, PCC, UHCC, Winstone Aggregates, Waka Kotahi, and PPFL. Further amendments are proposed to Policy CC.2 and these are set out in **Appendix A** of this statement.

### Kāinga Ora (Submitter 158)

35 Ms Woodbridge considers Policy CC.2 could be redrafted to provide greater clarity and direction for councils<sup>17</sup>. She considers there is duplication between the definition of travel choice assessment and clauses (a)-(c) of the policy and there are two different directions within the policy, and she considers these requirements can be more appropriately expressed as two separate policies.

### WIAL (Submitter 148)

36 Concerns are raised by Ms Hunter<sup>18</sup> in relation to activities such as rental car facilities and freight depots, for example which are located within proximity to the airport and may exceed the commercial threshold of 2,500m<sup>2</sup>. She notes these aren't necessarily owned or

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<sup>16</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.6

<sup>17</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.14

<sup>18</sup> HS3 S148, WIAL, Hunter, paragraph 71

operated by WIAL. Ms Hunter requests activities at the airport are exempt from Policy CC.2 and provides suggested amendments.

#### PCC (Submitter 30)

37 Mr Smeaton considers further amendments are required to Policy CC.2<sup>19</sup> as he considers, as drafted, it acts more as a method. Mr Smeaton has concerns about the additional resource consent requirements and the 'regional thresholds' and is of the opinion the policy directs applicants to provide travel choice assessments in resource consent applications before being given effect to in the respective district plan. Mr Smeaton considers Policy CC.2 essentially replicates the existing district plan methods in relation to 'high trip generating' activities. A definition is also proposed for high trip generating activity to support proposed amendments to Policy CC.2<sup>20</sup>.

38 The definition of travel demand management is sought to be deleted by Mr Smeaton.

#### UHCC (Submitter 34)

39 Ms Rushmere considers the recommended amendments to Policy CC.2 will result in a significantly worse outcome in comparison to the notified version within PC1<sup>21</sup>. Ms Rushmere considers there is a lack of understanding about the time and resources required to undertake a Schedule 1 process and the need to update associated documents and standards, such as design and engineering standard documents, there is no legislative basis for the policy and the timeframe to implement it is arbitrary. The measures identified in clauses (a) to (c) are beyond the control of district plans. Finally, Ms Rushmere raises that there is a lack of understanding of funding processes and road controlling responsibilities.

#### Winstone Aggregates (Submitter 162)

40 Mr Heffernan raises concerns there is a disconnect between the s42A report and the supporting expert traffic evidence and the intent of the policy and trip generation numbers. He raises concerns regarding the use of the terms 'freight' and 'other uses' and potential unintended consequences of Policy CC.2 applying to quarrying activities<sup>22</sup>. Mr Heffernan does not propose amendments to Policy CC.2.

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<sup>19</sup> HS3 S30, PCC, Smeaton, paragraphs 42-43

<sup>20</sup> HS3 S30, PCC, Smeaton, paragraphs 53

<sup>21</sup> HS3 S34, UHCC, Rushmere, paragraphs 177-181

<sup>22</sup> HS3 S162, Winstone Aggregates, Heffernan, paragraphs 6.3-6.5

### Waka Kotahi (Submitter 129)

41 Whilst Ms Heppelthwaite<sup>23</sup> supports the general approach in amended Policy CC.2, she considers further amendments are necessary in relation to threshold levels and where they apply. Amendments are also recommended to remove the reference to walkable catchment and the reference to greenfield within Table 1. Lower thresholds are recommended to provide more direction and support to city and district councils.

### PPFL (Submitter 118)

42 Whilst Mr Lewandowski acknowledges that the recommended amendments to Policy CC.2 in my s42A report remove some of PPFL's concerns, Mr Lewandowski is concerned about the enforceability, particularly in relation to clauses (a) and (b) as the use of these options depends on how a person wishes to travel<sup>24</sup>.

### Analysis and recommendations

43 With regards to the amendments proposed by Ms Woodbridge, I agree separating Policy CC.2 into two separate policies so they align with the two different outcomes sought will clarify the interpretation and application. However, I do not agree that clauses (a) to (c) within the body of the policy should be removed, as I consider these are critical to understanding the content and function of a travel choice assessment.

44 With regards to the perceived duplication between the definition of travel choice assessment and clauses (a)-(c) of Policy CC.2 as noted by Ms Woodbridge, I agree there is similarity. However, on balance I consider the definition is still useful to further clarify what a travel choice assessment is when read in conjunction with Policy CC.2.

45 With regard to Ms Hunter's<sup>25</sup> concerns about rental car facilities and freight depots, I disagree rental car facilities and freight depots that are not located on WIAL's site should be exempt from Policy CC.2. At paragraph 221 of my s42 report I consider Policy CC.2 would not be applicable to the airport as the majority of the site is designated (both land and air space). In my view, however it is important that car rental facilities and other freight depots demonstrate how they are contributing to and providing for a travel choice to and from the airport. Mr Tindall<sup>26</sup> discusses the importance of the airport being a

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<sup>23</sup> HS3 S129, Waka Kotahi, Heppelthwaite, paragraphs 7.5-7.8

<sup>24</sup> HS3 S118, PPFL, Lewandowski, paragraph 5.30

<sup>25</sup> Paragraph 71

<sup>26</sup> Paragraph 42

generator of trips and the contribution it makes to the movement of people and freight. He considers it is not appropriate to have a blanket exclusion of associated airport activities such as rental car facilities and freight depots. I am in agreement, particularly car rental facilities and freight depots which are operated by third parties and located in proximity to the airport.

46 With regards to the amendments proposed by Mr Smeaton and Ms Rushmere, in my opinion adopting these would result in the loss of the outcomes which Policy CC.2 seeks, i.e. an update to the district plans to require a travel choice assessment over a specified threshold in resource consent applications and that territorial authorities are to develop their own local thresholds. With regard to the inclusion of the timeframe within Policy CC.2, this is addressed in paragraph 211 of my s42a report on this topic and I maintain my opinion that a timeframe is required. I agree with the response provided in Mr Tindall's evidence at paragraphs 22 to 31 and at paragraph 57 to the matters raised by these submitters and do not repeat here. For clarity these matters relate to:

- a. 'high trip generating activities or network capacity' and a new definition for high trip generating activity (as in Policy CC.2 achieves more than this),
- b. the requirement for territorial authorities to develop their own local thresholds,
- c. the regional thresholds in Table 1 were deliberately set at a high level, and
- d. the thresholds in Table 1 do not trigger any resource consent requirements as these are provided as guidance for territorial authorities to develop their own local thresholds.

47 With regards to the use of existing thresholds within district plans that were developed to trigger a Traffic Impact Assessment, Mr Tindall discusses at paragraphs 30 and 31 of his evidence territorial authorities applying the same thresholds developed and in use for Traffic Impact Assessments. I agree with Mr Tindall that it is appropriate for Territorial Authorities to use the existing trip generation activity thresholds.

48 I don't consider Mr Heffernan's evidence further as he is not proposing any amendments to Policy CC.2.

- 49 Ms Heppelthwaite<sup>27</sup> considers the regional thresholds within Table 1 could be strengthened by proposed minor amendments to remove the reference to ‘walkable catchments’ and ‘greenfield’. I note the encouragement for GWRC to set lower thresholds. With regard to proposed amendments to Table 1 Mr Tindall discusses this at paragraph 32 to 34 of his evidence, noting there are broader linkages to walking and cycling infrastructure that should be provided outside of the areas considered as ‘walkable catchments’ or ‘greenfield’. I do not agree with the proposed amendments, by including ‘located within a walkable catchment’ and ‘greenfield’ enables a different criteria rather than any 100 units located anywhere or subdivision over 100 units also located anywhere. Territorial Authorities will then be able to expand on these differences as they develop their own local thresholds.
- 50 Regarding setting lower thresholds within Table 1, high thresholds were deliberately chosen to provide flexibility to territorial authorities when developing their local thresholds which are locally specific. When developing the thresholds in Table 1 we were cognisant of the resource and skill required to assess travel choice assessments by territorial authorities.
- 51 In relation to the requested amendments by Mr Lewandowski, I do not agree there is an enforceability issue in relation to clauses (a) to (c) within Policy CC.2 and that ‘will’ should be replaced with ‘can’. The travel choice assessment requires measures within the design of the subdivision, use and development. In my view, this is the same as any resource consent application. The subdivision, use and development should be constructed in accordance with the approved resource consent plans and its associated conditions of consent. In my view, clauses (a) to (c) would have the same level of enforceability as any other typical resource consent application.
- 52 In conclusion, of the amendments proposed by submitters within **Appendix A** of this evidence, I consider some of the amendments proposed by Kāinga Ora better simplify and clarify the outcomes sought by Policy CC.2, such as splitting it into two policies and a reshuffle of some of the text because of the split. I therefore set out my recommended amendments below. I address submitter evidence in relation to the associated definition of travel choice assessment at paragraphs 54 to 57 of this statement.

**Policy CC.2: ~~Travel choice assessment demand management plans~~ – district plans**

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<sup>27</sup> Paragraph 7.5



By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development to contribute to the reduction of greenhouse gas emissions by requiring consent applicants to provide a travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for choice assessment that:

- (a) demonstrates how the use of public transport and active modes will be maximised;
- (b) demonstrates how the use of private vehicles will be minimised; and
- (c) includes measures within the design of subdivision, use and development which achieves parts (a) and (b) above.

The requirement for a travel choice assessment must apply to all new subdivision, use and development over a specified travel choice development threshold as required by Policy CC.2A 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.

#### Policy CC.2A: Travel choice assessment local thresholds – district plans

By 30 June 2025, district plans shall include local thresholds for travel choice assessments as required by Policy CC.2. As a minimum, city and district councils must use the regional thresholds set out in Table 1 as the basis for developing their own local thresholds. The regional thresholds in Table 1 will cease to apply when Policy CC.2A is given effect through a district plan. To contribute to reducing greenhouse gas emissions city and district councils must develop their own travel choice thresholds that are locally specific.

Table 1: Regional Thresholds

<u>Activity and Threshold per application</u>
<u>100 residential units located within a walkable catchment.</u>
<u>Commercial development of 2,500m<sup>2</sup> gross floor area</u>
<u>Greenfield subdivision over 100 residential units</u>

#### Explanation

The regional travel choice thresholds have been developed as a minimum and as guidance to assist city and district councils in developing their local travel choice thresholds. Local travel choice thresholds are important to reflect the differences in connectivity and accessibility between rural and urban areas. In addition, local travel choice thresholds should reflect local

issues, challenges and opportunities. Local travel choice thresholds Location suitable development thresholds triggering a consent requirement for a travel demand management plan are to be developed by territorial authorities and should apply to residential, education, office, industrial, community, entertainment and other land use activities that could generate private vehicle trips and freight travel. Development thresholds should specify the trigger level (for example, number of dwellings, number of people accommodated or gross floor area) where the requirement for a travel choice assessment demand management plan requirement applies.

### Section 32AA evaluation

53 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy CC.2, including the recommended creation of new Policy CC.2A are the most appropriate as they are largely minor amendments to better align with Objective CC.3 of Change 1 and the new CC.2A is largely wording taking from CC.2 as amended in my section 42A report. The amendments separate the policy into two policies to provide greater clarity on the two separate outcomes sought by Policy CC.2. The outcomes sought by Policy CC.2 remain the same. I consider the amendments to Policy CC.2 by separating it into two separate policies will not add additional environmental or economic cost to the community as the timeframes for both policies are the same. I consider the social benefits will remain the same.

### **Travel Choice Assessment Definition**

54 The definition for Travel Choice Assessment is addressed in the evidence of Kāinga Ora and PCC.

### Kāinga Ora (Submitter 158)

55 Ms Woodbridge proposes amendments to the definition in response to proposed amendments to Policy CC.2. The amendments sought to the definition by Ms Woodbridge are to specifically include reference to public transport, and to require that accessibility and connectivity are 'maximised'<sup>28</sup>. The specific amendments are set out below.

*A travel choice assessment ~~demand management plan~~ demonstrates how the subdivision, use and development has considered, ~~and~~ incorporated and maximised accessibility and*

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<sup>28</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraph 6.15

*connectivity to public and active transport, sustainable transport modes and supports redistribution of demand from private car use to active and sustainable transport modes....*

#### PCC (Submitter 30)

56 Mr Smeaton proposes that the definition is deleted<sup>29</sup>.

#### Analysis and recommendation

57 As discussed in paragraph 44 of this statement, I consider the definition should be retained as it is needed to define what is meant by a travel choice assessment. With regards to the amendments proposed by Ms Woodbridge, as I have recommended retaining clauses (a) to (c) within Policy CC.2 I do not agree the definition needs amending.

#### **Method CC.3**

58 Method CC.3 is addressed in the evidence of Kāinga Ora.

#### Kāinga Ora (Submitter 158)

59 Whilst the Kāinga Ora submission sought that Method CC.3 was deleted, Ms Woodbridge is of the view it should be retained with amendments<sup>30</sup>. However, I note that there are no specific amendments proposed in Appendix A of Ms Woodbridge's evidence. Ms Woodbridge states that in her view, it is unclear what is meant by 'assist' and that this should be clearly articulated to confirm what level of guidance regional council will provide to territorial authorities through Method CC.3.

60 In my view the use of the word 'assist' is clear enough within the context of Method CC.3 and I do not consider it needs any further clarification.

#### **Policy CC.9**

61 Policy CC.9 are addressed in the evidence of WIAL, PCC, UHCC and PPFL, including further amendments to Policy CC.9 which are set out in **Appendix A** of this evidence.

#### WIAL (Submitter 148)

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<sup>29</sup> HS3 S30, PCC, Smeaton, appendix A

<sup>30</sup> HS3 S158, Kāinga Ora, Woodbridge, paragraphs 1.2(c) and 6.16

62 Ms Hunter seeks amendments to the explanation text for Policy CC.9. that specifically excludes the policy from applying to aircraft and excluding activities undertaken at Wellington Airport which support aircraft activities<sup>31</sup>.

PCC (Submitter 30)

63 Mr Smeaton considers the cross reference to Policy CC.1 can be removed and as discussed above at paragraph 9, disagrees with the proposed amendments to Policy CC.1. He further considers Policy CC.9 should be restricted to resource consents and notice of requirements rather than a review or change to a district or regional plan, and he incorporates reference to a 'well-functioning environment'<sup>32</sup>.

UHCC (Submitter 34)

64 Ms Rushmere considers Policy CC.9 should not apply to resource consents or notice of requirements and disagrees with the cross reference to Policy CC.1<sup>33</sup>. Amendments are proposed, which in Ms Rushmere's view would allow territorial authorities to include provisions in district plans which address scale and significance issues.

PPFL (Submitter 118)

Mr Lewandowski considers that by referencing Policy CC.1 within Policy CC.9, the policy wording focusses on increasing density in existing urban areas which is already directed by the NPS-UD and MDRS, and in doing so ignores the role of greenfield development<sup>34</sup>. Mr Lewandowski proposes amendments to address this concern.

Analysis and recommendations

65 With regard to the amendments proposed by PCC and UHCC which seek to restrict the application of policy whether just to resource consents, or just plan changes, variations and review, this matter is addressed in the s42A report for this topic at paragraphs 301 to 304. My view on this matter has not changed. It is appropriate Policy CC.9 apply to plan changes, variation or review and whether subdivision, use or development is planned in a way which optimises transport demand. This matter is not addressed through Policy CC.1.

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<sup>31</sup> HS3 S148, WIAL, Hunter, paragraph 73

<sup>32</sup> HS3 S30, PCC, Smeaton, paragraph 65

<sup>33</sup> HS3 S34, UHCC, Rushmere, paragraphs 187-190

<sup>34</sup> HS3 S118, PPFL, Lewandowski, paragraph 5.50

66 In terms of concerns regarding the hierarchy approach and cross referencing to Policy CC.1, amendments are proposed to Policy CC.1 which restrict the emphasis this policy has on directing the spatial location of development. I do agree the specific cross reference to Policy CC.1 within Policy CC.9 complicates the policy application and I therefore recommend it is removed. The definition of optimising overall transport demand, in my view, adequately directs the hierarchy approach. Therefore, I also recommend this is removed from the policy to simplify it.

67 Consistent with my conclusion in this statement for Policy CC.1 I agree with the amendments as proposed by Ms Hunter to the explanation of Policy CC.9 and recommend for clarification purposes the addition of 'e.g. aircraft parking stands at the airport', as set out below.

68 I therefore recommend the following amendments to Policy CC.9 below.

**Policy CC.9: Reducing greenhouse gas emissions associated with ~~transport infrastructure subdivision, use or development~~ – consideration**

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use ~~and-or~~ development ~~have~~ has been planned ~~in a way that contributes to reducing greenhouse gas emissions by to-optimise~~ optimising overall transport demand ~~by giving effect to its the~~ hierarchical approach ~~in-order-of-priority within Policy CC.1 (a) (c)~~, maximising mode shift from private vehicles to public transport or active modes, ~~and supporting the move towards low and zero-carbon modes in-a-way that contributes to reducing greenhouse gas emissions.~~

**Explanation**

This policy requires regional and district councils to consider whether subdivision, use and development proposals have fully considered all options to reduce *greenhouse gas emissions* as far as practicable. ~~For example, EV charging infrastructure, car share infrastructure, provision for bus stops and a transport network designed to support public transport or active modes.~~ This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities. e.g. aircraft parking stands at the airport.

### Section 32AA evaluation

69 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy CC.9 are the most appropriate as these are largely minor further amendments to better align with Objective CC.3 of Change 1. The amendments provide for greater clarity and simplify its application by removing the cross reference to Policy CC.1. The outcomes sought by the policy remain the same. I consider the amendments to Policy CC.9 will not add additional environmental or economic cost to the community. The social benefits will remain the same.

### **Policy CC.3**

70 Policy CC.3 is addressed in the evidence of PCC and UHCC.

#### PCC (Submitter 30)

71 Mr Smeaton considers Policy CC.3 should be reworded in order to provide greater clarity, to remove the need for a definition and remove the timeframe for implementation. Mr Smeaton also considers the terms 'enabling' should be replaced with 'provided for', on the basis that it would not be suitable to enable all infrastructure that supports zero and low carbon transport in all locations along with other amendments set out below<sup>35</sup>.

#### UHCC (Submitter 34)

72 Ms Rushmere disagrees that the timeframes in Policy CC.3 are appropriate and considers these don't reflect the resourcing required to implement the policy. Ms Rushmere also disagrees that the direction in the policy for EV charging can be achieved within the RMA framework<sup>36</sup>. Ms Rushmere recommends amendments to Policy CC.3 to address these matters, shown in Appendix 1 of her evidence), which include removing the timeframes and reference to EV charging.

### Analysis and recommendations

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<sup>35</sup> HS3 S30, PCC, Smeaton, paragraphs 58-62

<sup>36</sup> HS3 S34, UHCC, Rushmere, paragraphs 183-185

- 73 With regard to removal of the timeframe for implementation, I have addressed this concern within my s42a report at paragraphs 211 and 263. My position has not changed and I do not agree the timeframe should be removed.
- 74 I do not agree with the amendments proposed by Mr Smeaton and the associated rationale that enabling all infrastructure that supports zero and low carbon transport in all locations is appropriate and therefore amendments are necessary to the policy. At paragraph 264 of my s42a report I address the point that I consider it acceptable to enable ancillary infrastructure which supports transport modes such as EV charging point for E-bikes, E-buses, E-scooter. Ancillary adverse environmental effects would be addressed where relevant i.e. earthworks or vegetation clearance and set at appropriate scales by other provisions. If infrastructure is not necessarily appropriate in a particular location this would be addressed by other provisions i.e. indigenous biodiversity or heritage aspects, therefore I do not consider amending the policy to refer to 'by providing for' necessary. With regards to requiring a definition of 'zero and low carbon multi modal transport' this is addressed at paragraphs 72 and 73 of my s42a report. My view on this has not altered.
- 75 I disagree with Ms Rushmere that the outcomes sought by Policy CC.3 can't be achieved within the RMA framework. In my view Policy CC.3 can provide enabling direction for EV charging and this can be achieved within the RMA framework, including by providing for them as a permitted activity, which is the outcome sought by Policy CC.3. This is one of the mechanisms to support the reduction in greenhouse gasses which the National Emission Reduction Plan (NERP) directs and territorial authorities are required to have regard to it pursuant to s74(2)(b) of the RMA. In conclusion, I am not proposing any amendments to Policy CC.3.

#### **Policy CC.10**

- 76 Policy CC.10 is addressed in the evidence of WIAL, PCC and UHCC.

#### PCC (Submitter 30)

- 77 Mr Smeaton considers Policy CC.10 should address efficient and effective connections to transport networks rather than proximity of transport networks to freight distribution centres. Mr Smeaton considers 'similar activities with significant freight servicing requirements' will be captured by Policy CC.2, and therefore reference in Policy CC.10 is unnecessary duplication. The consideration of the policy through plan reviews, changes or variations is not supported by Mr Smeaton on the basis that other policies capture these

processes. Mr Smeaton seeks that a new definition of for 'freight depot' is included, that is consistent with the definition in the Porirua Proposed District Plan<sup>37</sup>.

#### WIAL (Submitter 148)

78 Consistent with her view on other policies within this topic, Ms Hunter considers the explanatory text for Policy CC.10 should be amended so it's explicit that the policy doesn't apply to activities undertaken at Wellington Airport which support aircraft activities<sup>38</sup>.

#### UHCC (Submitter 34)

79 Ms Rushmere disagrees with the amendments recommended in my S42A report and considers that significant freight activities are captured under Policy CC.2. Ms Rushmere also considers that the rezoning of industrial land can only be achieved through a plan change process<sup>39</sup>. Ms Rushmere recommends amendments to Policy CC.10 to address these points.

#### Analysis and recommendations

80 I do not agree with the amendments proposed by Mr Smeaton. As stated in the paragraphs above, I acknowledge the spatial location of land use and transport infrastructure are intrinsically linked. In my view Policy CC.10 is necessary as it provides emphasis on the efficient movement of freight at a regional level. I acknowledge connections to the transport network are also important, in addition to their location by proximity. Policy CC.2 focusses on travel choice assessments which are about providing options for how people travel. It is not focussed on trip generation and its impact on the road network and its efficiency of it. I therefore do not agree there is duplication with Policy CC.10 and Policy CC.2.

81 As stated within paragraph 343 of my s42A report greenhouse gas emissions from freight is one of the key matters addressed by the NERP. In my view it is necessary that Policy CC.10 maintains reference to 'a change, variation or review of a regional or district plan' to provide consistent regional direction regarding the location of zones or areas which provide for freight distribution activities and the efficiency of freight movement. I acknowledge there are other policies within the RPS and Change 1, such as Policy 32 which

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<sup>37</sup> HS3 S30, PCC, Smeaton, paragraphs 69-74

<sup>38</sup> HS3 S148, WIAL, Hunter, appendix A

<sup>39</sup> HS3 S34, UHCC, Rushmere, paragraph 192



address the spatial location of industrial areas and this is addressed within Hearing Stream 4.

82 As I do not recommend adopting the proposed wording of Policy CC.10, I do not agree a definition for freight depot is required. In addition, other plans may already have definitions for freight depots which may further complicate policy application.

83 I disagree with the amendments proposed to Policy CC.10 by Ms Rushmere. As addressed within paragraph 330 of my s42A report, this type of policy plugs a gap until the plans are updated. I addressed the matter of removing the references to notice of requirement or resource consents within paragraph 332 of my s42A report and my view hasn't changed. Freight distribution centres or freight depot can choose to establish at any location and apply for a resource consent and this eventuality needs to be addressed.

84 I also disagree that Policy CC.2 should address the efficient movement of freight in the same focussed way as Policy CC.10. Policy CC.2 directs district plans and it may take some time for the respective plans to be updated, so it's important that Policy CC.10 provides consistent regional direction until this time. Policy CC.2 focusses on travel choice assessments which is providing options for how people travel. It is not focussed on trip generation and its impact on the road network and its efficiency of it. I therefore do not agree there is duplication.

85 I agree with the amendments as proposed by Ms Hunter to the explanation of Policy CC.10 and recommend for clarification purposes that the addition of 'e.g. aircraft parking stands at the airport', as set out below.

86 In conclusion, I recommend adopting the relief sought by WIAL with additional wording to provide clarity to the explanation of Policy CC.10, as set out below.

[This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities. e.g. aircraft parking stands at the airport.](#)

#### Section 32AA evaluation

87 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy CC.10 are the most appropriate as these are largely minor further amendments to better align with Objective CC.3 of Change 1. The amendments provide for greater clarity in its application. The outcomes sought by the policy remain the same. I

consider the amendments to Policy CC.10 will not add additional environmental or economic cost to the community. The social benefits will remain the same.

### **Policy CC.11**

Policy CC.11 is addressed in the evidence of WIAL, PCC, UHCC, and PPFL. Of these WIAL and PCC propose amendments to Policy CC.11.

#### WIAL (Submitter 148)

88 Ms Hunter seeks amendments to the explanation text for Policy CC.11 to exclude activities undertaken at Wellington Airport which support aircraft activities<sup>40</sup>.

#### PCC (Submitter 30)

89 Mr Smeaton considers that the policy is more appropriate as a non-regulatory policy as it only seeks to 'encourage' whole of life carbon emissions assessments. Mr Smeaton considers that the policy should not be applied to a change, variation or review of a regional or district plan, as it is unclear how an assessment would relate to these processes. Mr Smeaton recommends further amendments that restrict the application of the policy to regional resource consents applications to the regional council, and that reference to guidance to be developed by Wellington Regional Council is included. To avoid specifically excluding the application of the policy to aircraft, Mr Smeaton recommends the policy only applies to 'land transport infrastructure'. Mr Smeaton also recommends that the term 'altered' be changed to 'upgraded'<sup>41</sup>.

#### UHCC (Submitter 34)

90 Ms Rushmere seeks that Policy CC.11 is deleted on the basis that the policy should be non-regulatory guidance, which is the relief sought through the submission by UHCC (S32.034). Ms Rushmere also states the proposed amendments to the policy impose a burden on road controlling and consenting authorities<sup>42</sup>.

#### PPFL (Submitter 118)

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<sup>40</sup> HS3 S148, WIAL, Hunter, appendix A

<sup>41</sup> HS3 S30, PCC, Smeaton, paragraphs 76-83

<sup>42</sup> HS3 S34, UHCC, Rushmere, paragraphs 195-196

91 Mr Lewandowski contends that it is not clear at what threshold Policy CC.11 should be applied, and that this could lead to varying interpretations and resulting disputes on the application of the policy direction<sup>43</sup>. As there are no proposed amendments to address this threshold and provide additional detail, Mr Lewandowski seeks that the policy is removed.

#### Analysis and recommendations

92 I have addressed the point regarding 'encourage' within a policy being non-regulatory in paragraph 358 of my s42A report. As I understand it, RPS policies which provide direction to resource consent processes and plan changes are labelled with the title consideration rather than non-regulatory and this is why it is labelled thus. As Policy CC.11 is directing a particular action for resource consents and plan changes and reviews it is appropriate therefore that it remains as a consideration policy rather than non-regulatory.

93 I addressed the matter of Policy CC.11 being a burden on road controlling authorities at paragraphs 355 and 356 of my s42a report. My view is there isn't an additional or unfair burden on road controlling authorities as embodied carbon will soon be included within the Building Act which will cover buildings. Policy CC.11 covers the components not covered by the Building Act i.e., roads. My understanding is Waka Kotahi already undertakes embodied carbon emission assessments. In addition, whole of life carbon emissions are supported by the NERP and territorial authorities are required to have regard to as per s74(2)(b) of the RMA.

94 In response to the amendments proposed by Mr Smeaton that Policy CC.11 should only apply to resource consents submitted to the regional council, this is addressed at paragraphs 360 and 361 of my s42A report. A regional resource consent application would likely be for large scale earthworks/vegetation clearance etc and not necessarily for a new road as this could be consented by a Notice of Requirement process to the Territorial Authority. I do consider the reference to a change or variation or review of a regional or district plan to be problematic in its current wording as I consider that 'consider' and 'encourage' are not directive enough. I do agree it's unclear to what extent this policy would be implemented in a plan change or review, if the goal is to provide assessments with resource consents. As noted above within paragraph 93, territorial authorities are

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<sup>43</sup> HS3 S118, PPFL, Lewandowski, paragraphs 5.56-5.58

required to give effect and have regard to the NERP and whole of life carbon assessments is one of the many areas it focusses on.

95 To assist with applying the policy, I do agree that amending the wording from 'altered' to 'upgraded' as its helpful in reducing the scale of its application to focus on larger works compared to activities such as maintenance and repair etc, as recommended by Mr Smeaton. I also agree including the phrase 'land transport infrastructure' is helpful. In my view, 'altered' in the context of this policy is too much of a burden and assists in reducing ambiguity in its application. I however do not agree the policy wording should be amended to specifically refer to assessment guidance. Table 1A of PC1 clearly links Policy CC.11 and new method CC.3A.

96 Mr Lewandowski contends that it is not clear at what threshold for engaging Policy CC.11 may be and that it could result in disputes as to when an assessment is to be provided. Policy CC.11 as drafted in my view is intended for application at a larger scale rather than smaller, and as previously noted plugs a gap until the plans are updated to give effect to the NERP. In my view, it would depend on the specific application being made as to whether an assessment would be needed or not to support their application. In my view, Policy CC.11 would not be grounds to reject an application for processing. This policy prepares the way for the NERP which territorial authorities need to give effect to. In the absence of the detail set out in Mr Lewandowski's evidence I do not agree Policy CC.11 should be deleted.

97 I agree with the amendments as proposed by Ms Hunter to the explanation of Policy CC.11 and recommend for clarification purposes the addition of 'e.g. aircraft parking stands at the airport'.

98 In conclusion, of the amendments proposed by submitters, I agree with proposed amendments by Ms Hunter, and I agree with some of the amendments proposed by Mr Smeaton as discussed above. I recommend the following amendments to Policy CC.11 below.

[Encourage When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessments is to be provided with resource consent applications to Wellington Regional Council and city and district councils for all new or upgraded altered land transport infrastructure. as part of the information submitted with the application.](#)

This information will assist with evaluating the potential *greenhouse gas emissions*, options for reducing direct and indirect *greenhouse gas emissions* and whether the infrastructure has been designed and will operate in a manner that contributes to the regional target for a reduction to transport-related greenhouse gas emissions.

#### Explanation

This policy encourages a whole of life *carbon emissions assessment* for new or [upgraded](#) [altered land](#) transport infrastructure. This assessment will provide information and evidence on predicted emissions to enable assessment of impacts and options in the context of regional targets to reduce *greenhouse gas emissions*. Waka Kotahi has a tool providing accepted assessment methodology. ~~This policy does not apply to aircraft~~ or [activities undertaken at Wellington Airport which support aircraft activities. e.g. aircraft parking stands at the airport.](#)

#### Section 32AA evaluation

99 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy CC.11 are the most appropriate as these reduce ambiguity and better align with Objective CC.3 of PC1. The amendments remove the application of the policy to a plan change, variation or review process as it is unclear to what extent this policy would apply to those processes. The outcomes of the policy have been reduced to apply to the resource consent and notice of require processes. I consider the amendments to Policy CC.11, by restricting its application to the resource consent and notice of requirement process and reducing its application to 'upgraded' will not add additional environmental or economic cost to the community as the scope in which Policy CC.11 applies is reduced. I consider the social benefits will remain the same.

#### **Carbon emission assessment definition**

100 The definition of 'carbon emission assessment' is addressed in the evidence of Mr Smeaton, who considers that the definition should be amended to refer to the measurement of 'carbon dioxide equivalent units' rather than measurement of

greenhouse gases by volume<sup>44</sup>. This recommended amendment will be addressed within the rebuttal evidence for the Climate Change General topic and so is not addressed in this evidence.

## **Policy 9**

101 Policy 9 is addressed in the evidence of WIAL. Ms Hunter seeks amendments to the explanation text for Policy 9, so that it specifically excludes the policy from applying to aircraft and excluding activities undertaken at Wellington Airport which support aircraft activities<sup>45</sup>.

102 I agree with the requested amendments as set out in Ms Hunter's evidence for the same reasons stated in paragraph 97 above, I recommend the following amendments to the explanation text of Policy 9.

103 [This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities. e.g. aircraft parking stands at the airport.](#)

### Section 32AA evaluation

104 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy 9 are the most appropriate as these are largely minor further amendments to better align with Objective CC.3 of Change 1. The amendments provide for greater clarity in its application. The outcomes sought by the policy remain the same. I consider the amendments to Policy 9 will not add additional environmental or economic cost to the community. The social benefits will remain the same.

## **Policy EIW.1**

105 Policy EIW.1 is addressed in the evidence of WIAL and UHCC and both seek amendments.

### WIAL (Submitter 148)

106 Ms Hunter agrees that that policy is seeking to promote alternative transport modes including public transport and that this could lead to assisting in reducing private vehicle

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<sup>44</sup> HS3 S30, PCC, Smeaton, paragraphs 87-91

<sup>45</sup> HS3 S148, WIAL, Hunter, appendix A

use, but Ms Hunter states that other factors will influence whether people will seek access to a private vehicle<sup>46</sup>. Therefore, Ms Hunter seeks that the policy is deleted, or amended.

#### UHCC (Submitter 34)

107 Whilst Ms Rushmere agrees with my recommendation that prioritising is not always possible, she considers that the use of ‘promote’ in the policy implies a marketing process, which is not aligned with the broader strategic role of the RLTP. Ms Rushmere also considers the explanation text is not consistent with the use of the term ‘promote’<sup>47</sup>. Ms Rushmere recommends amendments that in her opinion ensure the policy is consistent with the role of the RLTP in supporting mode shift, as set out below.

#### Analysis and recommendations

108 With regards the amendments proposed by Ms Hunter, I agree the amendments as proposed consider other factors will contribute to an individual decision about whether or not to use a car or have access to one. In my view the proposed amendments better describe the outcome. With regards to Ms Rushmere’s proposed amendments I do not consider ‘promoting’ should be replaced with ‘enabling’. The use of the term ‘enabling’ in my view is connected to a permitted activity status in a plan, I therefore do not consider it appropriate in reference to the RLTP. As the RPS needs to be consistent with the RLTP I consider the use of ‘promote’ more appropriate than ‘support’.

109 I recommend amendments to Policy EIW.1 below.

#### **Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan**

The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, to encourage a reduction in the dependency and use of private vehicles for everyday living. for people to live in urban areas without the need to have access to a private vehicle., by contributing to reducing greenhouse emissions.

Explanation

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<sup>46</sup> HS3 S148, WIAL, Hunter, paragraph 64

<sup>47</sup> HS3 S34, UHCC, Rushmere, paragraphs 164-166

This policy provides direction to the Regional Land Transport Plan, acknowledging the role of the objectives and policies in that plan, to promote mode shift from private vehicles to public transport and active modes by providing connected, accessible, affordable and extensive multi modal infrastructure and services.

Section 32AA evaluation

110 In accordance with section 32AA of the RMA, I consider that my recommended amendments to Policy EIW.1 are the most appropriate as these are largely minor further amendments to better align with Objective CC.2 of Change 1. The amendments provide for greater clarity in its outcome. The outcomes sought by the policy remain the same. I consider the amendments to Policy EIW.1 will not add additional environmental or economic cost to the community. The social benefits will remain the same.

All recommended amendments within this evidence are included as **Appendix B** to this evidence.

**DATE:**

**21 08 2023**

**Louise Ruth Allwood**

**Technical Lead – Planning, GHD Limited**