

Greater Wellington Regional Council

Submission on Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region

Clause 6 of First Schedule, Resource Management Act 1991
FORM 5

Correspondence to:

Attn: Environmental Policy
Greater Wellington Regional Council

Via email: regionalplan@gw.govt.nz

1. Submitter details:

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2. Scope of submission

- 2.1 This is a submission on Proposed Plan Change 1 (**PC1**) to the operative Regional Policy Statement for the Wellington Region 2013 (**RPS**) notified by the Greater Wellington Regional Council (**GWRC**) on 19 August 2022.
- 2.2 The submitter could not gain an advantage in trade competition through the submission.
- 2.3 The scope of this submission is detailed below and in Parts 3 and 4 of the submission.
- 2.4 The specific provisions that TKL's submission relates to are:
- (a) All proposed amendments to Chapter 3.9: Regional form, design and function, together with related amendments to Chapter 4.4: Non-regulatory policies and Chapter 5: Monitoring ... progress towards anticipated environmental results, in particular:
 - (i) amendments to the Chapter Introduction to Chapter 3.9;
 - (ii) amended Objective 22;
 - (iii) amendments to Policies 30 and 31;
 - (iv) amendments to Policy 67;
 - (v) amendments to anticipated environmental results arising from Objective 22;

(collectively referred to in this submission as the "**Urban Design Amendments**").

- (b) Proposed amendments relating to Freshwater generally (“**Freshwater Amendments**”).
- (c) Proposed amendments relating to Indigenous Biodiversity generally (“**Indigenous Biodiversity Amendments**”).
- (d) Appendix 3: Definitions – Definition of Regionally Significant Infrastructure (“**RSI Definition**”).

3. Summary of Submission

- 3.1 PC1 inserts, or amends, objectives, policies and methods intended to achieve well-functioning urban environments and to enable development to be implemented in an integrated and holistic manner which takes into account a range of considerations including freshwater and biodiversity values.
- 3.2 TKL owns most of the land located within the Airport Zone (**AZ**) of the Kāpiti Coast District Council (**KCDC**) Operative District Plan (**ODP**), which includes about 110ha of vacant land potentially suitable for development (**TKL Land**). The TKL Land contains all of Kāpiti Coast Airport (**KCA**), including land located on either side of the main runway of KCA which is zoned for a range of mixed use activities.
- 3.3 The TKL Land is ideally suited to development of a nature which would proactively help KCDC and GWRC to achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments in an integrated and holistic manner. In particular the TKL Land:
 - (a) is bounded on all four sides by urban (mostly residential) development, so that urban development of the TKL Land would be a logical infill;
 - (b) is vacant (except for airport infrastructure) and is readily able to be serviced by existing infrastructure (including upgrades if required) so it could reasonably be expected to be developed for urban purposes within short to medium term timeframes;
 - (c) is in a single ownership, which facilitates masterplanning leading to speedy and integrated development;
 - (d) contains freshwater and biodiversity values which could be maintained and enhanced as part of a holistic approach to integrated development.
- 3.4 PC1 includes the proposed RSI Definition which includes KCA. Retention of KCA in that RSI Definition will preclude the potential integrated and holistic development of the TKL Land in a manner which will help KCDC and GWRC to achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments.
- 3.5 Inclusion of KCA in the RSI Definition is not justified.
- 3.6 Deleting KCA from the RSI Definition would enable KCDC to determine the appropriate future zoning of the TKL Land and is therefore the most appropriate way to achieve the objectives and policies of the ODP (as informed by the RPS) in general and the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments in particular.
- 3.7 In this submission TKL does not suggest or request a determination about the appropriate future use and development of the TKL Land in general, or whether or not KCA and the existing AZ zoning provide for the most appropriate future use and development of the

TKL Land in particular. This submission merely seeks to enable KCDC to make that determination in the future, if and when required.

4. Reasons for Submission

4.1 The following extracts from the PC1 Section 32 Report are directly relevant to this submission:

- “6. *Change 1 is to implement the National Policy Statement on Urban Development (NPS-UD) and the National Policy Statement for Freshwater Management (NPS-FM) in the RPS. These NPS will also be implemented through regional plan and district plan changes.*
7. *The RPS integrates national direction in the regional context, and gives integrated direction to regional and district plans. We are changing the RPS because:*
- *There is recent national direction and support including national direction in urban development (NPS-UD required to be implemented by August 2022), fresh water, biodiversity (NPS-IB is at exposure draft stage) and climate change*
 - *Implementation of the NPS-UD and the NPS-FM needs to be done in an integrated management way. Urban development does not occur in isolation of managing cultural and physical resources*
 - *The current RPS does not give effect to recent national direction.*
8. *The NPS-UD is a primary driver for undertaking Change 1 now as it requires changes to the RPS by 20 August 2022 to enable more urban development and housing intensification. The driver for the scope of Change 1 is all relevant national direction both NPS-UD, NPS-FM and also other related national direction. It is important that inter-related issues are addressed at the same time.*
- ...
9. *The key topics being addressed in Change 1 are:*
- *Lack of urban development capacity in implementation of the NPS-UD in the RPS*
 - *Degradation of fresh water and implementation of the NPS-FM in the RPS*
 - *Loss and degradation of indigenous biodiversity including regional policy to implement central government strategy and draft RMA national policy direction.*
- ...”¹
- “20. *The NPS-UD is a primary driver for the timeframe and undertaking Change 1 in 2022 as it requires changes to the Regional Policy Statement and District Plans by 20 August 2022, to enable more urban development and housing intensification. While that timeframe is specific to the NPS-UD, the driver for the scope of Change 1 is all relevant national direction both NPS-UD, NPS-FM, and also other related national direction. It is important that inter-related issues are addressed at the same time. Hence the scope of this Change 1.”²*
- “45. *Change 1 is consistent with the WRGF [Wellington Regional Growth Framework], and provides regulatory weight to the Framework. Change 1 integrates climate*

¹ PC1 Section 32 Report at paragraphs 6-9 on pages 9-10.

² Ibid at paragraph 20 on page 11.

change, indigenous biodiversity and fresh water, all of which contribute to the direction of urban development.”³

- “46. *Change 1 updates the RPS to respond to updated information, current Greater Wellington Regional Council policy, new national direction, or other relevant changes since the development of the operative RPS, for the following:*
- *Lack of urban development capacity*
 - *Degradation of fresh water*
 - *Loss and degradation of indigenous biodiversity*
 - *The impacts of climate change.”⁴*
- “51. *A key focus in developing Change 1 and considering the resource management issues and responses to be included in Change 1, has been to take an integrated management approach. For Change 1, taking an integrated management approach means considering the connections between issues related to urban development and freshwater management, and a connected set of responses for the RPS direction for urban development, freshwater management, indigenous biodiversity and climate change.*
52. *The issues and topics in Change 1 are not independent of each other. Inappropriate use of natural resources, including both urban and rural activities, have damaged and continue to impact the natural environment, destroying ecosystems, degrading water, and leaving communities and nature increasingly exposed to the impacts of climate change. Projected population growth and economic development will place additional pressure on the natural environment. There are also significant pressures on the built environment in terms of the lack of urban development capacity and affordable housing ...”⁵*
- “58. *Change 1 applies the integrating frame to ensure that there is clear direction to territorial authorities to enable urban development that:*
- *Occurs in locations and uses approaches that prioritises the health of water bodies and freshwater ecosystems, and*
 - *Is resilient to the effects of climate change and accounts for a transition to a low/no carbon future, and*
 - *Protects areas of significant indigenous vegetation and significant habitats of indigenous fauna.”⁶*
- “62. *The HBA has confirmed that the Wellington Region lacks sufficient, affordable and quality housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. Housing affordability has declined considerably 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 also a lack of supporting infrastructure to enable the development of sufficient housing and ensure quality urban environments.*
63. *The 2022 HBA housing update report updates the 2019 baseline and finds that approximately 104,000 houses will be required by 2051 to meet demand. Based on current district plans, there will be a shortfall across the region at that time of more than 25,000 dwellings. The RPS and district plans implementing the NPS-UD with changes notified in 2022 will work together to address this critical shortfall over the next generation.*

³ Ibid at paragraph 45 on page 14.

⁴ Ibid at paragraph 46 on page 15.

⁵ Ibid at paragraphs 51-52 on page 15.

⁶ Ibid at paragraph 58 on page 17.

64. *Some urban land use and activities have damaged, and continue to impact, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change.”⁷*

4.2 The TKL Land is an excellent example of land with significant potential for development which could and (if it occurred) should be guided by the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments. In particular:

- (a) While parts of the land are zoned for mixed use development, that development would almost inevitably be carried out in a piecemeal manner because the existence of the airport effectively precludes a holistic and integrated approach.
- (b) The land contains freshwater values (Wharemauku Stream and a network of wetlands, ponding areas and drains), including freshwater fauna values (shortfin eel, common bully, and the ‘At Risk’ fish species inanga and longfin eel). These freshwater values are part of the Wharemauku Stream catchment which is listed in the PNRP⁸ as an ecosystem with significant indigenous biodiversity values.
- (c) Other indigenous values within the TKL Land include the ‘At Risk’ Ladies’ Tresses Orchid, native lizards and the ‘At Risk’ North Island fernbird.
- (d) These existing indigenous biodiversity values are not currently subject to any form of management protection. There is significant potential for maintenance and enhancement of those values through coordinated and integrated development.

4.3 The TKL Land could contribute immediately and meaningfully to accommodating projected population growth in fulfilling GWRC’s and KCDC’s obligations under the NPS-UD and KCDC’s *Te tupu pai / Growing Well – Our proposed approach for enabling sustainable growth in Kāpiti (Growing Well)* priorities and aspirations. In particular:

- (a) KCDC, along with GWRC and Wellington’s other constituent territorial authorities, are Tier 1 authorities under the NPS-UD. The Tier 1 authorities are required to improve housing affordability by supporting competitive land and development markets and enabling more people to live in, and more businesses and community services to be located in, areas of an urban environment where there is high demand for housing or for business land in the area, relative to other areas within the urban environment⁹. Tier 1 authorities must also provide, at all times, at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term¹⁰.
- (b) The Wellington-Horowhenua region is expected to accommodate an additional 200,000 people (above the existing population of around 580,000) and 100,000 jobs through to around 2050. Approximately two-thirds of the housing growth is expected to occur within existing urban areas, and approximately one-third will be in future urban areas, extending the current urban footprint of the region. Around 43% of the overall population growth is expected to be accommodated in the Region’s “western corridor” from Tawa to Levin¹¹.
- (c) In response to its NPS-UD obligations, in October 2021 KCDC released the community consultation document *Growing Well*, setting out the strategy to “grow well”

⁷ Ibid at paragraphs 62-64 on pages 17-18.

⁸ The Proposed Natural Resources Plan.

⁹ NPS-UD, Objectives 2 and 3

¹⁰ Ibid, Policy 2

¹¹ *Wellington Regional Growth Framework – 30-year spatial plan for the Wellington-Horowhenua region*, Wellington Regional Growth Framework, July 2021, p40

while accommodating the anticipated additional 32,000 in population in the District over the next 30 years¹².

- (d) This projected population will require, through to around 2048, an additional 8700 dwellings. Taking into account the NPS-UD's 20% buffer for competitive supply, around 10,500 dwellings will be needed over the next 30 years.
- (e) The *Growing Well* strategy's principles include supporting mana whenua aspirations; valuing the environment; fostering strong communities; encouraging low carbon living; enabling housing diversity and choice embracing the opportunities of growth (including "city thinking" that allows for the benefits that scale can bring in relation to jobs, education, training, and services while retaining community character)¹³.
- (f) The land is currently vacant (except for airport infrastructure) and has previously been identified as a Priority 1 candidate for urban development to help accommodate Kāpiti's projected population growth¹⁴.
- (g) The TKL Land could provide approximately 110ha of vacant land, centrally located within Paraparaumu's urban environment, available for a range of non-airport activities. The land presents a unique opportunity in its ability to contribute, immediately and meaningfully, to KCDC's and GWRC's aspirations and options for accommodating growth, fulfilling their obligations as NPS-UD Tier 1 authorities and meeting *Growing Well* principles.

4.4 The TKL Land could implement the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments by delivering:

- (a) around 3000 new homes, within distinct neighbourhoods;
- (b) a diversity of housing typologies including terrace housing, apartments, and detached units;
- (c) affordable price points;
- (d) retention, protection, enhancement and celebration of the TKL Land's taiao (natural environment), whenua (land), awa (waterways) and wai (water) habitats and values, taking into account Te Mana o te Wai, the NPS-FM, the Freshwater Amendments and the Indigenous Biodiversity Amendments;
- (e) sustainable urban and building design, recognising the challenges of climate change and supporting low-carbon living;
- (f) expansive, well located and connected open space areas, providing for active and passive recreation including walking and cycling networks;
- (g) the enablement of inclusive social amenities, including health, education and other community facilities and services;
- (h) retail to serve the local neighbourhoods and additional population to support Paraparaumu's existing retail centres;

¹² *Te tupu pai Growing Well – District Growth Strategy*, KCDC, page 4 (Attachment 1 to agenda item 10.2 for Council meeting held on 24 February 2022)

¹³ *Te tupu pai Growing Well – District Growth Strategy*, KCDC, page 31 Attachment 1 to agenda item 10.2 for Council meeting held on 24 February 2022)

¹⁴ Kāpiti Coast Urban Development Greenfield Assessment dated 7 July 2022, prepared for KCDC by Boffa Miskell.

- (i) employment opportunities, with emphasis on working closer to home, entrepreneurship, innovation, harnessing local talent networks and local supply chains;
- (j) an efficient roading network that integrates appropriately with the existing network and enables public and active transport to dominate over private vehicle trips, thereby internalising traffic as far as possible and minimising additional impacts on the existing roading network; and
- (k) infrastructural services that integrate with existing reticulated networks.

4.5 In providing for these features, the TKL Land could readily become, and could contribute to Paraparaumu's role as, a "well-functioning urban environment" under Policy 1 of the NPS-UD and amended Objective 22 of the RPS. Development within the TKL Land could be guided by a masterplan that sets out the intended layout of activities, roads, open spaces, ecological protection and enhancement, and development blocks, to achieve the overall vision of an integrated, connected, high quality urban neighbourhood with increased housing supply, variety and choice with a range of densities, typologies, and price options, all contributing to increased affordability of housing in Kāpiti Coast.

4.6 In delivering these features, the TKL Land could directly assist KCDC to achieve its *Growing Well* priorities and aspirations¹⁵ through implementation of the Urban Design Amendments. Such development could:

- (a) maintain, protect and enhance whakapapa and ancestral connections and the district's natural assets and connections between the natural environment and the values underpinning the Kāpiti lifestyle, while maintaining Paraparaumu's sense of place and identity;
- (b) provide a master-planned layout of urban spaces and variety of residential and non-residential activities providing equity of access within the new and existing communities, supporting active and healthy lifestyles, enabling positive interaction and connection, and building age-friendly, resilient and sustainable communities;
- (c) establish a sustainable community through active measures for carbon footprint reduction by intensification, reducing reliance on the private car, and sustainable building design and construction;
- (d) enable affordable and efficient urban form by intensifying and providing significantly more housing availability within the existing urban area, thereby increasing the captive market for, and efficiency of, public transport; taking advantage of the opportunities for attractive public spaces and green / blue networks from Wharemauku Stream; and contributing a fair share to the costs of infrastructure;
- (e) directly enable (by providing land and zoning) and otherwise contribute to expanding the District's diversification of business and employment opportunities to grow the skill base, attract healthcare and educational services, and promote Kāpiti as a lifestyle destination;
- (f) assist in preventing unnecessary outward expansion of urban growth onto, and fragmentation of, productive land outside existing urban areas; and

¹⁵ *Te tupu pai Growing Well – District Growth Strategy*, KCDC, pages 31-32 (Attachment 1 to agenda item 10.2 for Council meeting held on 24 February 2022)

- (g) contribute to the respectfulness, inclusivity and diversity of the population by promoting diversity in housing choices and affordability, and delivering vibrant, accessible and safe spaces and facilities for everyone to enjoy – both new and existing residents.

4.7 The physical existence of KCA, and in particular the main runway of KCA, significantly adversely affects the ability to develop the TKL Land in a holistic and integrated manner which recognises, maintains and enhances the existing and potential urban design, freshwater, indigenous biodiversity, social and economic values of the TKL Land and therefore adversely affects the extent to which development and use of the TKL Land can help to achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments. In particular:

- (a) The physical requirements of the KCA preclude use of a significant part of the TKL Land for any other purpose.
- (b) The runway effectively splits TKL Land in half, which precludes a coordinated and holistic approach to development of the TKL Land as a whole.
- (c) The airport operations give rise to noise and safety considerations which affect the potential proximity of urban development to the runway and the nature of urban development in close proximity to the runway.
- (d) The existence and use of the runway preclude transport connections connecting the eastern part of the TKL Land with the western part of the TKL Land.
- (e) Land either side of the KCA runway, which is zoned for a variety of mixed use developments enabled under the existing AZ zoning is able to be developed in a piecemeal and uncoordinated manner which precludes desirable urban environment outcomes.
- (f) Having to retain land required for KCA purposes would significantly adversely affect the urban design, environmental, ecological, social and economic outcomes of development of the TKL Land.

4.8 The term “*Regionally Significant Infrastructure*” is effectively defined by the list of infrastructure assets detailed in the RSI Definition. The RSI Definition does not include the basis upon which those infrastructure assets are identified as appropriate for inclusion in the RSI Definition. The only guide to the basis of that determination is contained within the explanation to Policy 8 of the RPS which states:

“Regionally significant infrastructure is an important physical resource that enables people and communities to provide for their social, economic and cultural wellbeing, and their health and safety.”

4.9 Policy 7 of the RPS seeks to ensure that regional and district plans recognise the benefits of RSI. Policy 7 (relevantly) reads:

“District and regional plans shall include policies and/or methods that recognise:

- (a) *The social, economic, cultural and environmental benefits of regionally significant infrastructure, including:*
 - (i) *people and goods can travel to, from and around the region efficiently and safely;*
 - (ii) *public health and safety is maintained through the provision of essential services: ... the provision of emergency services;”*

- 4.10 Policies 7 and 8 make it clear that in order to be considered as regionally significant infrastructure, the infrastructure should include benefits that contribute to the social, economic, cultural and environmental wellbeing, and the health and safety, of people and communities. Although not stated, it must be assumed that the relevant benefits of a particular infrastructure asset must be of such significance as to justify the inclusion of that infrastructure asset in the RSI Definition.
- 4.11 There are no other policies or methods in the RPS which establish or suggest that the benefits of KCA are of such significance as to warrant the inclusion of KCA in the RSI Definition.
- 4.12 In reference to the two relevant benefits ((i) and (ii)) identified in Policy 7(a), KCA does not:
- (a) significantly support efficient travel to and from the region. Only two minor airlines operate scheduled flights from KCA: Air Chathams operates a daily return flight service to Auckland on a turboprop plane designed to seat approximately 30 passengers; and Sounds Air operates a twice daily flight to Blenheim and a once daily flight to Nelson on a PC-12 or Cessna Caravan, seating 8-9 passengers. Given the relatively short distance to Wellington International Airport and the more efficient services that facility provides, KCA is not a regionally significant infrastructure asset that is necessary to ensure the safe and efficient movement of people and goods around the region;
 - (b) significantly support the maintenance of public health and safety through essential services. It is not specified as a “lifeline utility” under the Civil Defence Emergency Management Act 2002, and is therefore not considered to be a strategic infrastructure asset for civil defence purposes. This lack of strategic importance is supported by the fact that KCA is not relied upon in the Wellington Earthquake National Initial Response Plan¹⁶.
- 4.13 The Government’s decision in 1995 to sell the TKL Land into private ownership without conditions requiring KCA to be maintained as an aerodrome is further evidence that KCA is not a regionally significant infrastructure asset. Unlike virtually every other infrastructure asset listed in the RSI Definition, there is no basis for an assumption that KCA will remain as operational infrastructure. The TKL Land remains privately owned, and there is no legal obligation or expectation that the airport will remain an operational airport. Taking into account legal and practical considerations, KCA could be closed permanently on 1-3 months’ notice.
- 4.14 Given that KCA does not make a significant contribution to achievement of the identified relevant benefits of RSI as detailed in Policy 7(a), and given that there is no legal obligation for KCA to be maintained as an operational airport, KCA should not be included in the RSI Definition.
- 4.15 The inclusion of KCA in the RSI Definition effectively prevents a potentially more appropriate use and development of the TKL Land for other purposes that would better enable people and communities to provide for their social, economic and cultural wellbeing and would better achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments.
- 4.16 Section 32(1)(b) of the Resource Management Act 1991 (**the Act**) states:

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

¹⁶ Civil Defence New Zealand, Wellington Earthquake National Initial Response Plan: Supporting Plan [SP 02/18], December 2018 (“WENIRP”), page 82. Although identified as a “main hub for helicopter operations”, this is dependent on road access to Paraparaumu, which is expected to be isolated, and the Wellington Earthquake National Initial Response Plan does not become inoperable if this airport is not available.


- (a) ...
- (b) **examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—**
 - (i) **identifying other reasonably practicable options for achieving the objectives; and**
 - (ii) **assessing the efficiency and effectiveness of the provisions in achieving the objectives; and**
 - (iii) **summarising the reasons for deciding on the provisions; ...**

- 4.17 In examining whether the inclusion of KCA in the RSI Definition is the most appropriate way to achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments, it is necessary to consider the possible options. The only options available are:
- A. retain KCA in the RSI Definition in Appendix 3 – i.e. the status quo option; or
 - B. delete KCA from the RSI Definition.
- 4.18 The potential outcome of either option includes the possibilities that the use of the TKL Land for airport operations may continue, or operations may be discontinued and the airport decertified, as the inclusion of KCA in the RSI Definition does not prevent the owner of the TKL Land from closing and decertifying the airport.
- 4.19 The implications of Option A are that:
- (a) if the airport were to continue operating, the result would be the consequences detailed in paragraph 4.7 above;
 - (b) if the airport were to stop operating, lower-level documents that are required to give effect to the RPS (such as the ODP) will continue to be required to give effect to Policy 8 to protect the (non-operational) airport from incompatible subdivision, use and development, likely through continuation of the existing special zoning, resulting in the owner of the TKL Land being required to apply for resource consents for most non-airport related activities in order to make practical use of the TKL Land. This would have significant and ongoing transactional costs for parties, including the developer, purchasers within the development, local authorities, neighbours and the local community. It would also result in significant amounts of uncertainty in overall planning outcomes from the numerous resource consent processes.
- 4.20 Option B would enable lower-level documents, including the ODP, from considering alternative land uses, including developing the land for urban purposes (residential and a range of related activities and amenities). Developing the land for urban purposes would have the consequences detailed in paragraphs 4.3-4.6 above.
- 4.21 TKL submits that the analysis and assessment detailed in this submission leads to the conclusion that deleting KCA from the RSI Definition is the most appropriate way to achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments (together with all other objectives related or relevant to those amendments).
- 4.22 TKL emphasises that the purpose of this submission is not to seek any determination, or even any indication, about appropriate use and development of the TKL Land in general and whether or not KCA should remain an operational airport, or should be closed, in particular. Whether such a debate should be undertaken, and what the outcome of such a debate may be, are matters for future consideration. What TKL seeks is to enable that debate to potentially take place and for the outcome of such a debate to be determined by

KCDC as the local authority, rather than that debate being precluded from taking place by GWRC as the regional authority.

5. TKL seeks the following decision from the Greater Wellington Regional Council:

- 5.1 TKL **SUPPORTS** the Urban Design Amendments and requests that they be confirmed.
- 5.2 TKL **SUPPORTS** the Freshwater Amendments and requests that they be confirmed.
- 5.3 TKL **SUPPORTS** the Indigenous Biodiversity Amendments and requests that they be confirmed.
- 5.4 TKL **OPPOSES** the notified definition of Regionally Significant Infrastructure and requests that the definition be amended by deleting the reference to 'Kāpiti Coast Airport' (amendment shown in ~~bold strikethrough~~ text for deletions below):

| Regionally significant infrastructure |  |
|--|---|
| <p>Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • <u>pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment</u> • <u>a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001</u> • <u>a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989</u> • <u>the National grid</u> • <u>facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network</u> • <u>facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network</u> • <u>the local authority water supply network (including intake structures) and water treatments plants</u> • <u>the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities</u> • <u>the Strategic Transport Network (including ancillary structures required to operate, maintain, upgrade and develop that network)</u> • <u>The following local arterial routes: Masterton-Castlepoint Road, Blairlogie-Langdale/Homewood/Riversdale Road and Cape Palliser Road in Wairarapa, Tītahi Bay Road and Grays Road in Porirua, and Kāpiti Road, Marine Parade, Mazengarb Road, Te Moana Road, Akatārawa Road, Matatua Road, Rimu Road, Epiha Street, Paekakariki Hill Road, The Parade [Paekakariki] and The Esplanade [Raumati South] in Kāpiti</u> • <u>Wellington City bus terminal and Wellington Railway Station terminus</u> • <u>Wellington International Airport</u> • <u>Masterton Hood Aerodrome</u> • Kapiti Coast Airport • <u>Commercial Port Areas and infrastructure associated with Port related activities in the Lambton Harbour Area within Wellington Harbour (Port Nicholson) and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines</u> • <u>Silverstream, Spicer and Southern landfills</u> | |

- ~~pipelines for the distribution or transmission of natural or manufactured gas or petroleum~~
- ~~strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001~~
- ~~strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989~~
- ~~the national electricity grid, as defined by the Electricity Governance Rules 2003~~
- ~~facilities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003~~
- ~~the local authority water supply network and water treatment plants~~
- ~~the local authority wastewater and stormwater networks, systems and wastewater treatment plants~~
- ~~the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016~~
- ~~Wellington City bus terminal and Wellington Railway Station terminus~~
- ~~Wellington International Airport~~
- ~~Masterton Hood Aerodrome~~
- ~~Paraparaumu Airport~~
- ~~Commercial Port Areas within Wellington Harbour and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines~~

- 5.5 As a consequential change to the relief requested in paragraph 5.4 above, TKL requests that '*Figure 3: Wellington Regional Growth Framework corridors*', which is contained in the Chapter Introduction to Chapter 3.9: Regional Form, Design and Function, be amended by deleting the small aeroplane annotation just above the centre of the 'Western Growth Corridor – Tawa to Levin'.
- 5.6 TKL seeks such alternative, additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including modifications to any other provision or combination of provisions, provided that the intent of this submission is achieved.

TKL **DOES** wish to be heard in support of this submission.

If others make a similar submission, TKL will consider presenting a joint case with them at a hearing.

Signature of Submitter



M Familton

Authorised to sign on behalf of Templeton Kapiti Limited

14 October 2022

Telephone: 03 409 2258

Notes to person making submission:

If you make your submission by electronic means, the email address from which you send the submission will be treated as an address for service.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of Schedule 1 of the Resource Management Act 1991.

The submitter could NOT gain an advantage in trade competition through this submission.