

**Proposed Change 1 to the Wellington Regional Policy Statement
Hearing Stream 3 – Climate Change**

Speaking Notes – Rory Smeaton on behalf of Porirua City Council

2pm, Wednesday 30th August 2023

1. Thank you Chairs and members of the two hearing panels.
2. My name is Rory Smeaton. I am a Principal Policy Planner employed by Porirua City Council (PCC). I produced a statement of planning evidence in support of a number of submission points from PCC on the provisions in Change 1 being addressed in Hearing Stream 3 – Climate Change relating to the ‘Energy, waste and industry’ and ‘Transport’ topics.
3. As stated in my evidence, I generally agree with the recommendations made by Mr Wyeth in the Section 42A Report on the ‘Energy, waste and industry’ topic. However, I recommended additional amendments to further clarify those provisions. While Mr Wyeth has picked up some of those amendments in his rebuttal evidence, other amendments, which I consider to be important, have not been accepted. Those include, for example, the inclusion of the protection of regionally significant infrastructure in Policy 7. I continue to support those amendments for the reasons stated in my evidence.
4. In relation to the provisions in the ‘Transport’ topic, I also continue to support the changes I recommended in my evidence and generally disagree with the recommended amendments of Ms Allwood in her Section 42A Report and rebuttal evidence. Further, I consider that the recommendations of Ms Allwood, rather than improving the provisions, will in some cases result in additional confusion and potentially poor outcomes.
5. In relation to Policy CC.1 which addresses reducing greenhouse gas emissions associated with transport, Ms Allwood states in response to my recommendation that the reference to ‘altered’ should be replaced with ‘upgraded’ that she anticipates that smaller scale activities would likely be a permitted activity and therefore not require a resource consent. While this may be true, I consider that the wording of the policy needs to be clearer and as such continue to recommend that the policy refer to ‘upgraded’ infrastructure. This will be particularly important if there is no definition of ‘altered’ included in the RPS as is recommended by Ms Allwood, as ‘altered’ is a less commonly used term within RMA documents in relation to infrastructure compared to ‘upgraded’.
6. I also continue to consider that the inclusion of both a definition of ‘optimise transport demand’ as well as the three subclauses in Policy CC.1 results in duplication and confusion. I note that other submitter evidence also raised this point. I consider the wording of the policy should be rationalised and continue to support the wording I recommended in my evidence.
7. I strongly disagree with Ms Allwood’s recommendations on Policy CC.2 relating to ‘travel choice assessments’. In particular, I consider the addition of Policy CC.2A is unnecessary and only adds confusion. While the proposed policy wording states that, the ‘regional thresholds’ are to be used ‘as a minimum’ by territorial authorities ‘as the basis for developing their own local thresholds’, it also states that ‘district councils must develop their own travel choice thresholds that are locally specific’. These statements appear to be somewhat contradictory. Additionally, it says that the ‘regional thresholds’ will ‘cease to apply’ when Policy CC.2A is given effect to. It is not clear to me what those thresholds would

apply to prior to territorial authorities giving effect to Policy CC.2 in district plans, unless they are intended to also apply to resource consents during that period. For these reasons, and those stated in my evidence, I continue to support my recommended amendments to Policy CC.2.

8. I disagree with Ms Allwood's assessment of Policy CC.3 relating to reducing greenhouse gas emissions in her rebuttal evidence. I continue to support the amendments I recommended in my evidence. Similarly, I continue to support the amendments I recommended in my evidence for the reasons stated in relation to Policies CC.9 and CC.10.
9. Additionally, I note that I agree with the amendments to the definition of 'Carbon emission assessment' recommended in Mr Wyeth's rebuttal evidence for the 'Climate Change General' topic. Mr Wyeth recommends the term be amended to 'Whole-of-life greenhouse gas emissions assessment', which I agree with. Unfortunately, this has not been carried forward by Ms Allwood into the wording of the relevant policy (Policy CC.11). Along with the amendment of that term, I also consider that the policy should be non-regulatory as I recommended in my evidence.
10. Overall, I consider that further amendments are required to the provisions in Change 1 relating to the 'Energy, waste and industry' and 'Transport' topics to ensure PCC can continue to meet its statutory obligations.