

Form 5

Submission on publicly notified proposal for policy statement or plan, change or variation  
Clause 6 of Schedule 1, Resource Management Act 1991

To: Greater Wellington Regional Council  
PO Box 11646  
Manners Street  
**Wellington 6142**

Attn: Environmental Policy

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

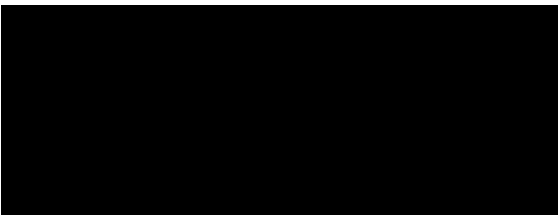
Name of submitter: Parkvale Road Limited  
200 Parkvale Road  
**Wellington 6012**

This is a submission on **Plan Change 1 to the Natural Resources Plan**.

Parkvale Road Ltd (PRL) could not gain an advantage in trade competition as a result of this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are set out in the attached table. PRL seeks that the decisions sought in the attached table are adopted, or any other such relief and/or consequential amendments are made that achieve an equivalent or similar outcome.

PRL wishes to be heard in support of its submission. PRL does not wish to present a joint case.



Signed: \_\_\_\_\_

Jon Thompson  
On behalf of Parkvale Road Limited

Date: 15 December 2023

**Address for Service:**

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**Contacts Details:**

Attention: Mitch Lewandowski

[REDACTED]

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## 200 Parkvale Road

200 Parkvale Road is a large rural block of some 335 hectares. It adjoins the urban edge of Karori as shown in Figure 1 below, with physical connection to Parkvale Road at the south-eastern edge of the site, and Montgomery Avenue at the south-western edge of the site.



Figure 1. 200 Parkvale Road

The entire site is zoned General Rural Zone under the Proposed Wellington City District Plan (PDP) with various overlays applying to portions of the site, including a Ridgelines and Hilltops overlay at the southern edge of the site, and a number of Significant Natural Areas located throughout the site. The Skyline Walkway also traverses through the site.

PRL lodged a submission with the Wellington City Council in September 2022 on the notified PDP. That submission sought to rezone two discrete areas of the site, one for Medium Density Residential zoning, and one for Large Lot Residential zoning. In the intervening time, PRL has decided to not pursue the area of Large Lot Residential zoning, but will pursue its submission in respect of the area of Medium Density Residential zoning. This area is shown in Figure 2 below.

Submissions relating to the rural zone provisions of the PDP will be heard in March 2024.

The area PRL is seeking to rezone measures approximately 38,860m<sup>2</sup> (3.88 hectares) as a result of utilising existing parcel boundaries along with existing roads within the site to reflect a logical zoning boundary. However, for topographical reasons and due to other constraints such as a proposed SNA in this area, in practice the area over which development could ultimately occur is significantly smaller than that.



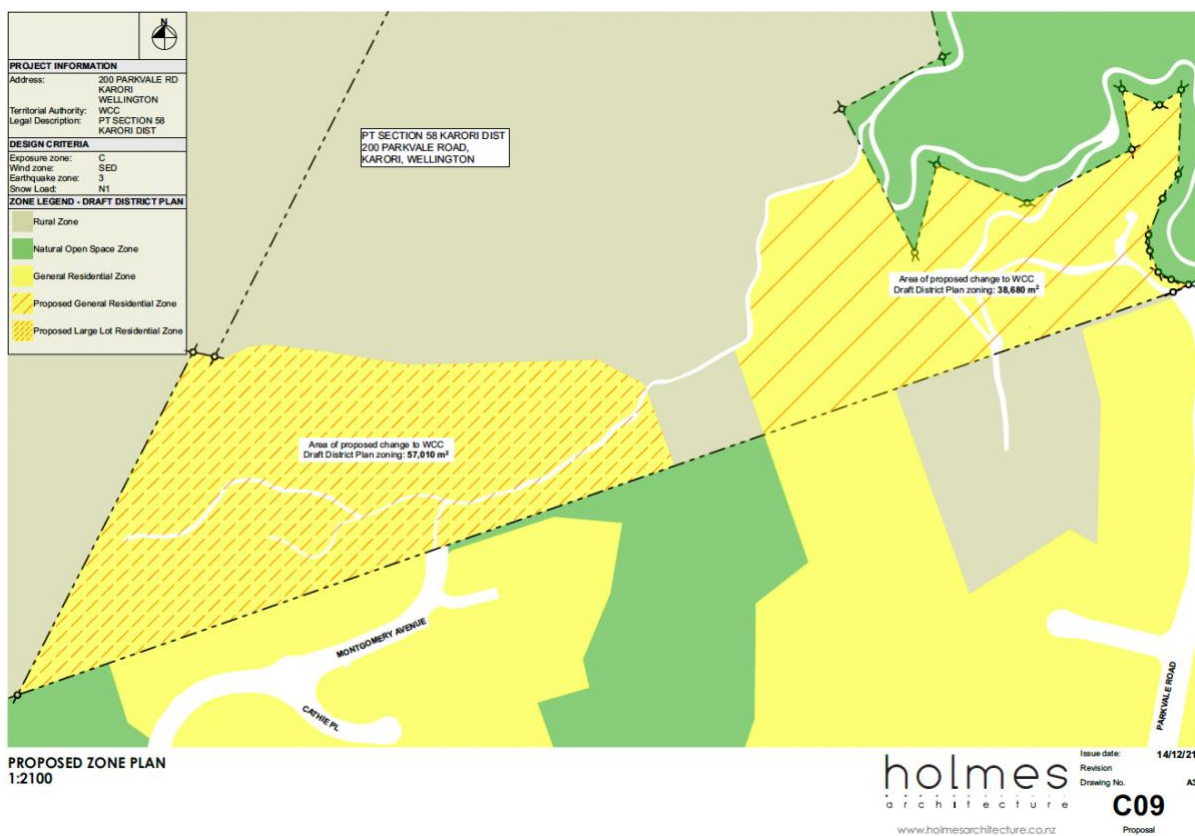


Figure 2. Rezoning sought at 200 Parkvale Road.

While not zoned residential, this area of the site already accommodates residential development, with three residential units being located in the area. The property also provides access to two other residential properties immediately to the south of the site. These are shown in Figure 3. While recently lapsed, resource consent has previously been granted for a further 5 residential dwellings on the site, immediately to the east of the existing development.

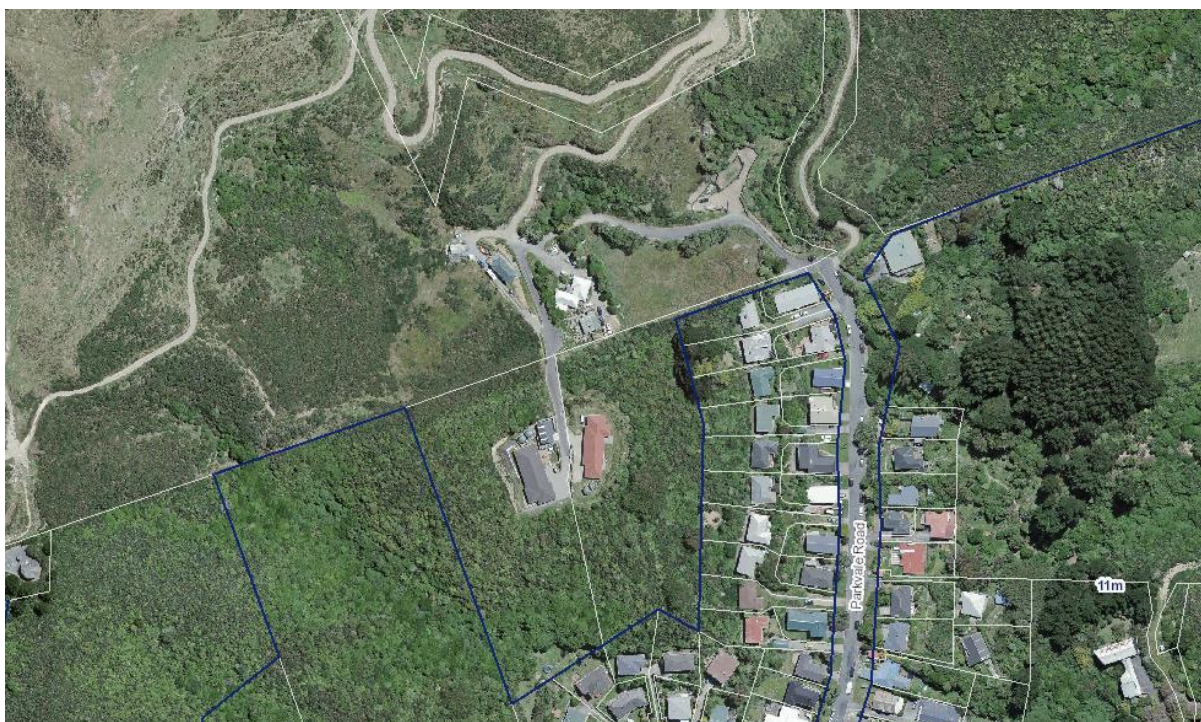


Figure 3. Existing residential development at 200 Parkvale Road and access to neighbouring properties.

PRL is concerned that the effect of Plan Change 1 (PC1) is to prohibit the residential rezoning of the site, and that given the scale of the potential residential development of this site, to require a further plan change to the

Natural Resources Plan (NRP) is a disproportionate response to the scale of rezoning being sought from the Wellington City Council, and the ultimate development yield that might be realised from this site.

It is also a disproportionate response given the already established residential activity on this site, and the additional residential development that was previously consented despite the rural zoning in this area. A zoning change of this site, as is presently being sought, would be reflective of the existing use of this portion of the site and provide for important residential development capacity immediately adjacent to the existing urban area.

The approach proposed by PC1 is contrary to the direction of the NPS-UD.

PRL is aware of and supports the need to address stormwater matters appropriately and comprehensively. PRL does not agree however that this needs to occur through a prohibited activity status, and therefore plan change process, and considers that the Section 32 evaluation for PC1 has not given due consideration to the appropriate activity status for the management of this activity, nor the associated costs.

PRL also notes the announcement by the Government on 14 December that the NPS-FM will be replaced. Given that PC1 is giving effect to the NPS-FM which is being replaced, it will very likely be out of step with higher order policy direction. PRL considers that this should give the Council pause for thought in progressing with PC1.

| Chapter                                  | Provision  | Support/Oppose/Amend | RMA Process       | Submission  | Relief Sought  |
|--|--|----------------------|-------------------|---|--|
| Definitions                              | Unplanned greenfield development   | Oppose               | Part 1 Schedule 1 | <p>PRL is opposed to the proposed approach towards unplanned greenfield development.</p> <p>PRL seeks the deletion of the definition which forms part of a package of provisions opposed by PRL.</p>  | Delete the definition of 'Unplanned Greenfield Development'.   |
| Chapter 8<br>Whaitua Te Whanganui-a-Tara | Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives. | Amend                | Part 1 Schedule 1 | <p>PRL is opposed to the proposed approach towards unplanned greenfield development.</p> <p>PRL requests an amendment to the Policy reflective of this opposition, that still provides for stormwater quality matters to be addressed appropriately.</p> <p>PRL also requests a further amendment that addresses the proposed financial contribution regime which is opposed.</p> | <p>Amend the policy as follows:</p> <p>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives</p> <p>Target attribute states and coastal water objectives will be achieved by regulating discharges and land-use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</p> <p>(a) <del>prohibiting unplanned greenfield development and for other greenfield developments</del> minimising the contaminants from greenfield developments <del>and requiring financial contributions as to offset adverse effects from residual stormwater contaminants,</del> and</p> <p>(b) encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</p> <p>(c) imposing hydrological controls on urban development and stormwater discharges to rivers, and</p> |

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|   |  |        |                   |   | <p>(d) requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</p> <p>(e) stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</p> <p>(f) requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</p> <p>(g) soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</p> <p>(h) requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</p> |
| Chapter 8<br>Whaitua Te<br>Whanganui-<br>a-Tara | Policy WH.P15<br>Stormwater<br>contaminant<br>offsetting for<br>new<br>greenfield<br>development | Oppose | Part 1 Schedule 1 | <p>PRL is opposed to the proposed financial contribution approach. PRL opposes the proposed approach as set out in proposed Schedule 30 and all associated provisions.</p> <p>The proposed approach will impact on housing affordability, and appears to be proposed on a flat fee basis regardless of catchment, scale of development, consideration of the existing environment, or consideration of how effective onsite stormwater treatment may be.</p> <p>PRL is also concerned that, aside from the definition of unplanned greenfield development, it is unclear from the PC1 provisions how greenfield development is defined for the purposes of the financial contribution provisions.</p> | Delete the policy.  |

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| Chapter 8<br>Whaitua Te<br>Whanganui-<br>a-Tara | Policy<br>WH.P16:<br>Stormwater<br>discharges<br>from new<br>unplanned<br>greenfield<br>development.              | Oppose | Part 1 Schedule 1 | <p>PRL is opposed to the proposed approach towards unplanned greenfield development.</p> <p>PRL considers that the proposed approach is contrary to the requirements of the NPS-UD, in particular Policies 1(d) and 8.</p> <p>PRL considers that a prohibited activity status is a disproportionate response that has been inadequately assessed in the section 32 evaluation. Requiring a plan change to both a district and regional plan will impose significant costs. In the PRL example, the stormwater effects of an area of land of less than 4ha can be appropriately considered and addressed through a resource consent process.</p> | Delete the policy.  |
| Chapter 8<br>Whaitua Te<br>Whanganui-<br>a-Tara | Rule WH.R11<br>Stormwater<br>from new and<br>redeveloped<br>impervious<br>surfaces –<br>discretionary<br>activity | Amend  | Part 1 Schedule 1 | <p>PRL is opposed to the proposed financial contribution approach. PRL opposes the proposed approach as set out in proposed Schedule 30 and all associated provisions.</p>  | Delete matter (b) of the Rule and make any other necessary consequential amendments in respect of the proposed financial contribution regime. |
| Chapter 8<br>Whaitua Te<br>Whanganui-<br>a-Tara | Rule WH.R13:<br>Stormwater<br>from new<br>unplanned<br>greenfield<br>development<br>– prohibited<br>activity.     | Oppose | Part 1 Schedule 1 | <p>PRL is opposed to the proposed approach towards unplanned greenfield development.</p> <p>PRL is opposed to Rule WH.R13 as a means to give effect to Policy WH.P16 and seeks its deletion.</p>  | Delete the rule.  |
| Chapter 12<br>- Schedules                       | Schedule 30:<br>Financial<br>Contributions  | Oppose | Part 1 Schedule 1 | <p>PRL is opposed to the proposed financial contribution approach. PRL opposes the proposed approach as set out in proposed Schedule 30 and all associated provisions.</p>  | Delete Schedule 30  |



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| Chapter 13<br>- Maps | Map 87:<br>Unplanned<br>greenfield<br>areas –<br>Wellington<br>City Council. | Oppose | Part 1 Schedule 1 | <p>PRL is opposed to the proposed approach towards unplanned greenfield development.</p> <p>PRL seeks the deletion of the map which forms part of a package of provisions opposed by PRL.</p> | Delete the map. |