

**Before the Hearings Panel
At Porirua City Council**

Under Schedule 1 of the Resource Management Act 1991

In the matter of the Proposed Porirua District Plan

Between **Various**

Submitters

And **Porirua City Council**

Respondent

**Statement of supplementary planning evidence of Gina Marie Sweetman on
behalf of Porirua City Council**

Date: 28 June 2022

INTRODUCTION:

1 My full name is Gina Marie Sweetman. I am a consultant planner, engaged by Porirua City Council (the Council) for the purpose of the Proposed Porirua District Plan (PDP).

2 I have read the respective evidence in support of Silverwood of:

- a. Ms Stephanie Blick, planning
- b. Mr Adam Thompson, economics
- c. Mr John Hudson, landscape

3 I have prepared this statement of evidence on behalf of the Council in respect of technical related matters arising from the submissions and further submissions on the PDP.

4 Specifically, this statement of evidence relates to the matters relating to the Silverwood submission which is addressed in Section 3.14 of my section 42A report on the Future Urban Zone. In preparing this evidence, I have considered the addendums prepared by:

- a. Ms Rose Armstrong, landscape
- b. Mr Phil Osborne, economics.

5 I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

6 Appendix C of my section 42A report sets out my qualifications and experience.

7 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2014.

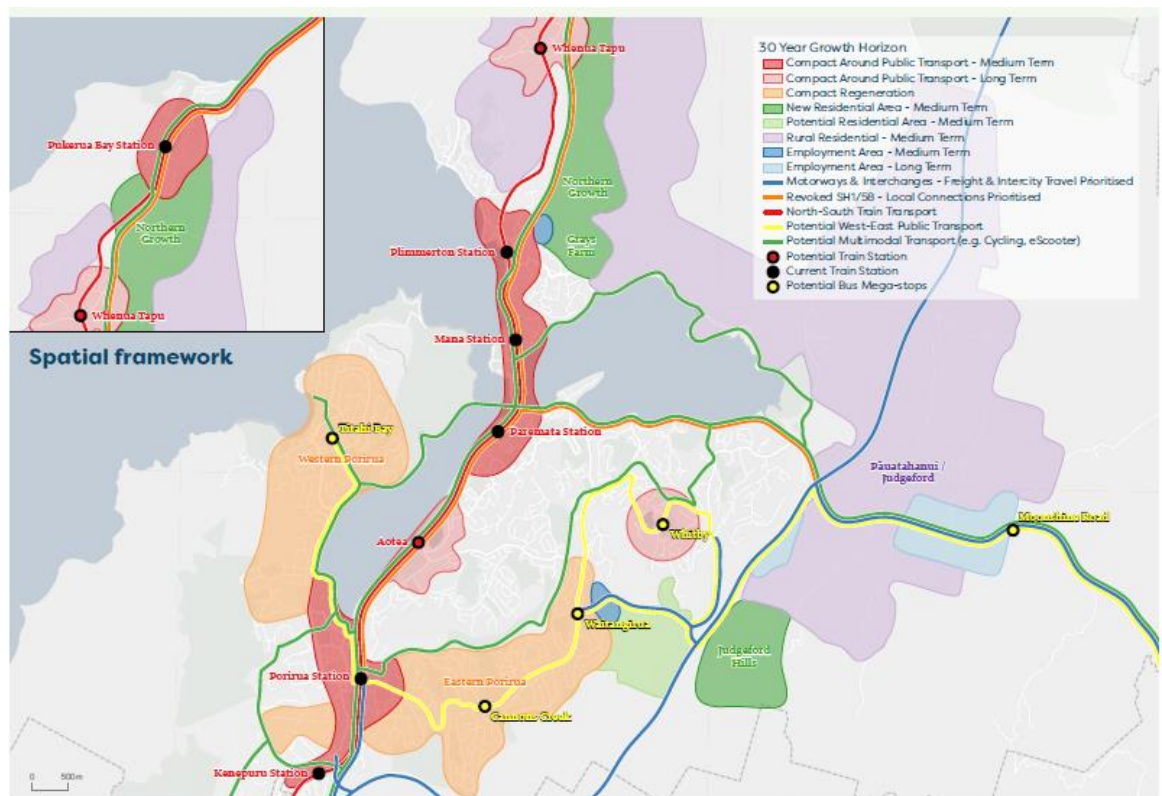
SCOPE OF EVIDENCE

8 My statement of evidence addresses the following matters:

- a. Whether the Silverwood site is “in” the Porirua Growth Strategy and meets the test under FUZ-P1-1, or needs to be considered under FUZ-P1-2.
- b. Whether the Plimmerton Farm Plan Change 18 to the Operative District Plan is an appropriate comparison to the Future Urban Zone sought by the Silverwood submission
- c. Whether rezoning the site to Future Urban now gives effect to NPS-UD and PDP direction

IS THE SILVERWOOD SITE “IN” THE PORIRUA GROWTH STRATEGY

9 I have included the plan shown in the Porirua Growth Strategy in my section 42A report and I have reproduced it below.



10 I agree with Ms Blick that the Silverwood land is shown as “Potential Residential Area – Medium Term”. I also agree with Ms Blick that the Growth Strategy includes the following statement:

*“Our urban boundary will be extended in the east from the Lanes Flat interchange in the north, to Kenepuru in the south and between Waitangirua/Cannons Creek to the Transmission Gully Motorway (TGM) (with the exception of Judgeford Hills). **This means land to the east of Whitby/Waitangirua and Cannons Creek up to Transmission Gully Motorway can be considered for residential zoning through the Proposed District Plan review.**”*

11 Where I disagree with Ms Blick is whether the Silverwood Site meets the criteria under FUZ-P1-1. The crux of this is in the use of the word “potential” in the Growth Strategy in respect to the Silverwood site and the content of the paragraph set out above.

12 I sourced two definitions of potential:

“the chance or possibility that something will develop and become real”¹

“possible when the necessary conditions exist”²

13 Both of these talk about possibility, rather than certainty. The paragraph quoted above from the Growth Strategy also talks of the consideration of the Silverwood land for rezoning through the PDP process.

14 As I have expressed in my section 42A report, I consider that Silverwood does not qualify for inclusion through FUZ-P1-1 in the same manner that Judgeford Hills, Judgeford Flat and the Northern Growth Area do. I remain of the view that Silverwood must be considered against FUZ-P1-2. The purpose of the FUZ-P1-1 was to bring over the sites that were confirmed for future urban development through the Growth Strategy, and FUZ-P1-2 is for the introduction of new sites for future urban development. The Growth Strategy was signalling that the Silverwood landowners may seek a rezoning through the PDP process, which they have done.

15 As is set out in the section 32 evaluation report, the Judgeford Flat, Judgeford Hills and Northern Growth Area Future Urban Zones have all been identified for future urban development since the mid to late 1990s. Economic modelling was amongst a number of

¹ Mirriam Webster Dictionary

² Cambridge Dictionary

different technical inputs that informed the Growth Strategy and their continued inclusion as growth areas within Porirua. To that end, there was not the same need to justify their identification as Future Urban Zone under FUZ-P1-1, as the need for these areas had already been determined through previous Local Government Act and National Policy Statement for Urban Development Capacity 2016 (NPS-UDC) processes.

- 16 As the PDP has yet to give full effect to the National Policy Statement on Urban Development 2020 (NPS-UD) and was largely developed under the NPS-UDC, I focussed my evaluation on the NPS-UD when evaluating the submission. Ms Blick has appeared to also focus on the subsequent rezoning and structure plan process for urban development to occur, rather than on the zoning of land to the Future Urban Zone. My focus has simply been on whether it is appropriate now, in the circumstances, to rezone the land from Rural to Future Urban, in accordance with FUZ-P1-2, the PDP's strategic objectives, and the NPS-UD.

IS THE PLIMMERTON FARMS PLAN CHANGE COMPARABLE TO REZONING THE SILVERWOOD SITE FUTURE URBAN

- 17 I do not agree with Ms Blick that the recent Plimmerton Farm Plan Change 18 to the Operative Porirua District Plan is a relevant comparison to what is being sought through the Silverwood submission to the PDP. Ms Armstrong also addresses this in her addendum.
- 18 Plan Change 18 was a rezoning of Rural zoned land to the "Plimmerton Farm Zone" through a plan change to the Operative District Plan. There was no Future Urban Zone in place, as this is not a zone in the Operative District Plan. I agree that the Plan Change considered the whole land, which was appropriate in terms of what was sought, and a comprehensive structure plan process was appropriate. The Plimmerton Farm Zone includes three distinct precincts A, B and C. Precincts A and B are "urban" zones while Precinct C can be better described as "Hillside" or rural lifestyle zones.
- 19 The Future Urban Zone is described in the National Planning Standards as "Areas suitable for urbanisation in the future and for activities that are compatible with and do not compromise potential future urban use". In contrast, the Rural Lifestyle Zone is described as "Areas used for predominantly for a residential lifestyle within a rural environment on

lots smaller than those of the General rural and Rural production zones, while still enabling primary production to occur”.

20 I agree that any future rezoning of the land needs to take an integrated structure planned approach. What I do not agree is appropriate, should the Panel consider it appropriate to rezone the land to Future Urban, is for all of the land to be zoned Future Urban. This is because quite simply, based on the evidence from both the submitter and Council experts, not all of the site is suitable for urbanisation in the future. My preference would be for a more nuanced approach where it is only those areas that are appropriate for urban development are zoned Future Urban.

21 This recommendation is consistent with my recommendations in respect of the Judgeford Flat Future Urban Zone. In response to evidence and submissions, I have recommended that some of the land shown as Future Urban in the PDP be rezoned as Rural Lifestyle, as it has been demonstrated that it is not appropriate for future urban development.

22 Another comparator are the Muri Block and Mount Welcome blocks which are to be the subject of a soon to be notified Variation to the PDP. These are two big blocks of land, side by side, which have a split zone across them. The western portion of the sites are zoned Future Urban and the eastern portion Rural Lifestyle. This is because through the previous Northern Growth Area Structure Plan 2014, the Porirua Growth Strategy and the PDP itself, it was identified that not all of either site was appropriate for future urban development.

WHETHER REZONING THE SITE TO FUTURE URBAN NOW GIVES EFFECT TO NPS-UD AND PDP DIRECTION

23 The primary reason I do not recommend that the Silverwood submission be accepted is articulated in paragraphs 328 to 338 of my s42A report, which I do not repeat. This assessment was informed by Mr Osborne’s evidence. This addendum is further informed by his addendum in which he provides commentary on Mr Thompson’s evidence.

24 I note that since my section 42A report was released, the Council has published its updated Housing Capacity Assessment (HBA) in conjunction with the other councils in the Wellington Region. This is appended as Appendix A.

- 25 I agree with Ms Blick that any plan variation or change to rezone land from FUZ to urban would require an evaluation of the future supply and projected demand to achieve an appropriate capacity to meet the requirements of the NPS-UD. And that is the crux of the issue. At this point, the evidence from Mr Osborne is that there is no requirement to provide any additional greenfield land for urban development within the short, medium or long term. Therefore, I see no point at this time to rezone the subject site to Future Urban. I also note Mr Osborne’s conclusion in paragraph 46 of his addendum that *“the PDP provides for significant levels of greenfield capacity. Additional capacity in this form will impact upon the markets willingness and ability to realise urban capacity”*.
- 26 I would also question the contribution of this site to meeting housing needs and delivering “affordable housing” given the likely cost constraints of a steep topography (which I would note is very different from the greenfield land in and around Greater Christchurch, as referenced by Mr Thompson in his evidence) and those imposed by the Wellington Region Natural Resources Plan and the National Environmental Standards for Freshwater. I note from Ms Blick’s evidence that she anticipates a yield of only 200 dwellings for the Silverwood land, and I assume an additional 300 more on the Landcorp land (based on the transport assessment with the submission). I am unclear as to whether 500 dwellings on this topographically challenged land would be able to make a material contribution to affordable housing, since according to Mr Thompson’s evidence, the PDP as a whole does not do this.
- 27 I affirm my opinion, that the effect being considered is that of the oversupply of housing land to meeting the objectives of the NPS-UD. The economic evidence is that there will be harm to meeting these objectives. I am also mindful that the MDRS and upcoming variation to the PDP to implement NPS-UD policy 3 will be material to the supply of housing land and the future shape of the Wellington urban environment. While the Variation has yet to be notified, it is a statutory obligation on the Council to do so, and the requirements of the Intensification Planning Instrument which will form Variation 1 are very directive. With the limited amount of submission and appeal rights to the Variation, the evaluation and conclusions in Mr Osborne’s evidence must be given significant weight. In my opinion, the Silverwood rezoning submission needs to be viewed in that context.

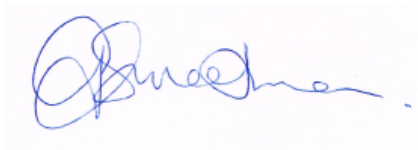
OVERALL RECOMMENDATION

28 My recommendation contained in 3.14.3 remains unchanged.

Date: 28 June 2022

Gina Sweetman

Consultant Planner

A handwritten signature in blue ink, appearing to read "Gina Sweetman", is centered on the page. The signature is fluid and cursive, with a distinct loop at the beginning and a trailing line ending in a period.