

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED TO HEAR AND MAKE DECISIONS ON
SUBMISSIONS AND FURTHER SUBMISSIONS ON THE PROPOSED PORIRUA DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991 (the
Act)

AND

IN THE MATTER of Hearing of Submissions and Further
Submissions on Variation 1 to the Proposed
Porirua District Plan, and Plan Change 19 to
the Operative District Plan under Schedule 1
of the Act

STATEMENT OF EVIDENCE OF PAMELA ANNE GUEST

ON BEHALF OF WELLINGTON REGIONAL COUNCIL

24 February 2023

Executive Summary

- 1 Climate change presents a formidable challenge to the safety and well-being of our communities and natural environment.
- 2 The increase in housing density and development enabled by Variation 1 increases the exposure of communities to the adverse effects of climate change if development is not carried out in appropriate places and ways.
- 3 Nature-based solutions provide significant opportunities to increase the resilience of our communities and natural environment to the effects of climate change, while safeguarding biodiversity and improving human well-being.
- 4 Greater Wellington seeks amendments to embed nature-based solutions into the Porirua District Plan to support the Porirua community to transition to a low-emission and climate-resilient city.

Qualifications and experience

- 5 My full name is Pamela Anne Guest. I am a senior policy advisor in the Environmental Policy team at the Wellington Regional Council (Greater Wellington).
- 6 I hold a Bachelor of Science with 1st class Honours in geography and environmental sciences from the University of Otago, with post-graduate papers in environmental planning and law, and planning theory from the University of Waikato, and papers in landscape architecture from Lincoln University.
- 7 I have over 25 years of experience in resource management planning, working at both central and local government levels, with a focus on water and soil management, indigenous biodiversity, and climate change.
- 8 I have worked at Greater Wellington for 7 years, initially as topic lead for the Natural Resources Plan hearings for wetlands and biodiversity, beds of lakes and rivers, and significant sites. I led the development of proposed RPS Change 1 provisions for climate change and indigenous ecosystems.
- 9 I am a member of the Climate Group of Te Uru Kahika – Regional and Unitary Councils Aotearoa, which provides strategic co-ordination and support to increase the effectiveness and efficiency of the regional sector's response to climate change.

Code of conduct

10 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023 (Part 9). I have complied with the Code of Conduct in preparing this evidence. My experience and qualifications are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Scope of evidence

11 My evidence addresses Greater Wellington's submission points that seek amendments to Variation 1 to the Proposed Porirua District Plan (the Variation) to ensure that nature-based solutions for climate change are an integral part of new and intensified subdivision, use and development, to reduce greenhouse gases and increase the resilience of Porirua's communities and natural ecosystems to existing and future climate impacts.

12 Proposed Change 1 to the Regional Policy Statement for the Wellington Region (Proposed RPS Change 1) nature-based solutions provisions relevant to this submission are set out in Appendix 1. While I did not prepare the Greater Wellington submission on Variation 1, I led the team that drafted these provisions.

Background – Climate change and urban intensification

13 Proposed RPS Change 1 identifies four significant and urgent resource management issues for the region:

- the impacts of climate change
- loss and degradation of indigenous biodiversity
- degradation of freshwater
- lack of urban development capacity.

14 Proposed RPS Change 1 includes a suite of new objectives, policies and methods to respond to new national direction to address the impacts of climate change in managing freshwater, indigenous biodiversity and urban development as set out in:

- the Climate Change Response Act 2002

- the National Emissions Reduction Plan 2022
- the National Adaptation Plan, and
- the Aotearoa New Zealand Biodiversity Strategy

15 Amongst other matters, proposed RPS Change 1 provides new direction to district plans to ensure that urban intensification is not at the expense of indigenous biodiversity, freshwater, coastal environments, the region’s transition to being low-emission and climate resilient, and the ability of Māori to express their cultural and traditional norms.

16 The Porirua Long-Term Plan 2021-51 acknowledges that the impacts of climate change are already being felt in Porirua, with average temperatures and sea levels rising, and more frequent and severe flooding and slips.

17 Cyclone Gabrielle and the string of increasingly frequent and damaging weather events in New Zealand and across the world bring into sharp focus the need for a step-change in the adoption of climate change mitigation and adaption measures by all sectors.

18 In 2022 the Intergovernmental Panel on Climate Change AR6 summary report for policymakers¹ warned that any further delay in systemic and transformative change, particularly in the way in which we use and develop our natural and physical resources, will miss a brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all. The report also highlighted the global trend of increasing urban growth and intensification as providing a critical opportunity in the near-term to advance climate resilient development (“high confidence”).

19 The AR6 report concludes that “Integrated, inclusive planning and investment in everyday decision-making about urban infrastructure, including social, ecological and grey/physical infrastructures, can significantly increase the adaptive capacity of urban and rural settlements.”

20 As Porirua City is approaching a period of significant urban growth and housing intensification, the Variation provides a critical opportunity to ensure that appropriate locational constraints and design features are embedded into new subdivision, use and

¹ Intergovernmental Panel on Climate Change (2022): AR6 Summary for Policy makers
https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf

development decisions to both reduce greenhouse gas emissions and strengthen climate-resilience. This includes:

- avoiding further development in areas or in ways that will result in a significant natural hazard risk (addressed in the evidence of Dr Iain Dawe),
- integrating natural features into the built environment at a variety of scales, including by requiring good structure planning for greenfield development and as matters of assessment when enabling infill/brownfield development,
- avoiding damage to and, preferably, protecting, enhancing or restoring natural ecosystems that can provide significant mitigation and/or adaptation benefits.

Amendments sought by Greater Wellington

- 21 Greater Wellington has requested amendments to the Variation to ensure that nature-based solutions are an integral part of new subdivision, use and development to support climate change adaptation and mitigation and improve the health and resilience of people, biodiversity, and the natural environment.
- 22 As discussed in the evidence of Mr Stuart Farrant on behalf of Greater Wellington (dated 24 February 2023), the increase in density and development enabled by Variation 1 increases the exposure of communities to the adverse effects of climate change if development is not carried out in appropriate places and ways, therefore increasing the importance of good development design and design elements, including those provided by nature-based solutions. This aligns with direction given in the National Adaptation Plan to prioritise nature-based solutions in planning and regulations.
- 23 Greater Wellington seeks the following amendments to embed nature-based solutions into the Variation:
- i. Include policies seeking to improve the climate resilience of urban areas through measures identified in proposed RPS Change 1 Policy CC.14. [OS74.31, FS74.94]
 - ii. Include matters of control or discretion in relevant rules that consider the extent to which the development will improve climate resilience. [OS74.33]
 - iii. As a matter of control or discretion for subdivision and increases in density, the extent to which the development design protects, enhances, restores, or creates

nature-based solutions to manage the effects of climate change, or similar.

[OS74.36]

- iv. Provisions that recognise the functions of the ecosystems providing nature-based solutions to climate change and avoid adverse effects of subdivision, use and development on their functions, including before they are mapped. Policies should:
- v. direct the protection of areas that already perform a function as a nature-based solution, including the many wider benefits these can have.
- vi. encourage the restoration of areas that provide nature-based solutions. [OS74.37]
- vii. require water sensitive urban design and consideration of downstream effects on freshwater for activities that will increase density and aren't permitted. [OS74.10, OS74.11, OS74.7, OS74.8, OS74.14, FS74.169, FS74.135]
- viii. Provisions to reduce water demand by seeking efficient water use. [OS74.15]

24 Nature based solutions are actions to protect, enhance, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans to the effects of climate change, while having co-benefits for indigenous biodiversity and the natural environment.

25 Examples include using vegetation (such as street trees or green roofs) or water elements (e.g., rain gardens, porous surfaces) to help reduce heat in urban areas or support stormwater and flood management, restoring coastal dunelands to provide increased protection to communities from the effects of storms linked to sea level rise, and leaving space for estuarine ecosystems, such as salt marshes, to retreat inland in response to sea level rise.

26 The technical evidence of Mr Stu Farrant on behalf of Greater Wellington (dated 24 February 2023) discusses the risks of continuing with a “business as usual” approach to development planning and design, and describes, and provides examples of, good practice climate-resilient design which integrates nature-based solutions into development at a range of scales.

S42A Officer's Response

27 The officer's section 42A report has rejected all Greater Wellington's submission points that request amendments to incorporate nature-based solutions into the Variation,

because the relief sought is too vague, is out of scope, is not supported by a detailed s32AA assessment, and that the proposed RPS Change 1 provisions themselves are poorly drafted.

28 While there is room to fine-tune the proposed RPS Change 1 nature-based solutions provisions and provide some additional definitions, in my opinion their intent is clear, as is the importance of embedding them into the planning framework of the Variation now, rather than delaying this to a future plan change or review as recommended by the s42A reporting officer.

29 I acknowledge that while the use of “nature-based solutions” in development planning is a relatively novel approach for district plans, a number of territorial authorities already require the use of water sensitive urban design in some circumstances or pursue water sensitive urban design initiatives outside of their District Plan - this is a type of nature-based solution. The constructed wetland recently built to treat stormwater prior to discharge into Te Awarua-o-Porirua is an example.

30 I note that the Strategic Direction Chapter of the Porirua City Proposed District Plan includes specific objectives (REE-O3 and REE-O4) recognising the importance of avoiding any significant increase in risk from natural hazards, including the effects of climate change, and the need for Porirua to adapt to the effects of climate change. It is important that this strategic direction be given effect by an appropriately robust policy and rule structure, including in Variation 1.

31 Greater Wellington has identified a number of provisions across the Variation where amendments to provide for nature-based solutions would contribute to the relief being sought. These are set out in Appendix 1, along with examples of nature-based solution provisions from the Wellington City Proposed District Plan to provide clarity on the type of amendments being requested.

32 Amendments sought include adding rules to zone, future urban development, infrastructure and subdivision chapters to require the use and protection of nature-based solutions for development at a range of scales, including measures described in the technical evidence of Mr Farrant. Due to the restrictive nature of the Medium Density Residential Standards, Greater Wellington seeks for these requirements to apply to activities causing an increase in housing density, which aren't permitted.

- 33 I also consider that amendments to provisions in the Variation (particularly zone chapters) to mitigate the impacts of increased housing density on stormwater quality and quantity, as provided for by Section 80(e) and sought in Greater Wellington’s submission, would support a direction of travel toward nature-based solutions in the District Plan. For example, requiring water sensitive urban design to manage stormwater quality (beyond the existing hydraulic neutrality provisions) for activities that increase density and aren’t permitted, would address some relief sought in the submission [e.g., OS74.10, 14].
- 34 Greater Wellington also consider that amendments to provisions in the Variation (particularly zone chapters) to mitigate the impacts of increased housing density on stormwater quality and quantity, as provided for by Section 80(e) and sought in our submission, would support a direction of travel toward nature-based solutions in the District Plan. For example, requiring water sensitive urban design to manage stormwater quality (beyond the existing hydraulic neutrality provisions) for activities that increase density and aren’t permitted, would address some relief sought in our submission [e.g. OS74.10, 14].
- 35 Greater Wellington would be happy to work with council officers to develop these in further detail.

Conclusion

- 36 The challenges facing our communities and natural environment in the face of a changing climate are immense. In 2021, He Pou a Rangi the Climate Change Commission issued a call to all New Zealanders to “take climate action today, not the day after tomorrow”, concluding that New Zealand needs to be proactive and courageous as it tackles the challenges our country will face in the years ahead and that bold climate action is possible when we work together².
- 37 Both the Climate Change Commission and central government are clear that local government and the planning system have important roles to play in climate change mitigation and adaptation to complement national policy direction and initiatives.
- 38 Due to its statutory weight, the district plan provides a powerful tool to ensure that where and how development takes place, especially in relation to the intensification of housing,

² New Zealand Climate Change Commission, 2021: Ināia tonu nei: a low emissions future for Aotearoa

will support the Porirua community to transition to a low-emission and climate-resilient city. Variation 1 provides an important opportunity to ensure that the planning framework is fit for this purpose.