

**Before the Independent Hearings Panel  
Upper Hutt City Council**

**In the matter of** the hearing of Submissions and Further Submissions  
on the Upper Hutt City Council Proposed  
Intensification Planning Instrument under Schedule 1  
of the Act

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**Memorandum of Counsel on behalf of Wellington Regional Council -  
Submitter 41**

**Date: 8 May 2023**

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**MAY IT PLEASE THE PANEL:**

- 1 The Wellington Regional Council (**GWRC**) is a submitter (submission 41) on Upper Hutt City Council's Intensification Planning Instrument (**IPI**). It provided evidence in support of its submission and appeared before the IHP on Friday 28 April 2023.
- 2 The purpose of this memorandum is to provide the IHP with the additional evidence requested at that hearing by the IHP, from Mr Richard Sheild and Ms Pam Guest.
- 3 Mr Sheild has addressed:
  - 3.1 The 'genealogy' of the changes he proposed to the IPI, specifically what part of the Whaitua Implementation Plan recommendations he was responding to and the relevant specific provisions from the Regional Policy Statement (including Plan Change 1), and
  - 3.2 In relation to new conditions or matters of discretion he proposed are inserted, amended wording to add clarity and certainty.
- 4 The IHP requested that Ms Guest consider whether the changes to the IPI that she proposed went far enough to achieve the outcomes sought, being 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.
- 5 She considers that further amendments would be appropriate and provides an amended word version of Appendix 3 to her evidence (which contained her suggested draft provisions) to provide further support for the above outcome.

6 In addition, as requested by the Panel, Ms Guest has provided examples of:

6.1 provisions from other plans (namely HCC Plan Change 12 and Auckland Unitary Plan Change 78) that provide for climate resilience and better stormwater management; and

6.2 News items that discuss the effectiveness of good stormwater management in Auckland City to manage runoff from extreme rainfall events.`

**Date:** 8 May 2023



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Kerry Anderson / Kate Rogers  
Counsel for Wellington Regional  
Council