

18 September 2026

100 Cuba Street
Te Aro, Wellington 6011
PO Box 11646
Manners Street
Wellington 6142
T 04 384 5708
F 04 385 6960

Greater Wellington Regional Council
PO Box 11646
Wellington 6142

Attention: Saritha Shetty – Hearings Co-ordinator
Email: district.plan@huttcity.govt.nz

Proposed Lower Hutt District Plan: Letter to be tabled at Hearing Stream 6 – Infrastructure

Greater Wellington Regional Council (Greater Wellington) lodged a submission (S452, 2 May 2025) and a further submission (FS38, 24 July 2025) on the Proposed Lower Hutt District Plan (PDP).

Greater Wellington requests that this letter be tabled for the Hearing Panel's information and consideration.

Under Hearing Stream 6: Infrastructure, the submission points made by Greater Wellington are addressed within the following Section 42A reports:

- Infrastructure, prepared by Peter McDonald, dated 24 August 2026;
- Renewable Electricity Generation, prepared by Cristal Bennett, dated 24 August 2026;
- Three Waters, prepared by Cristal Bennett, dated 24 August 2026; and
- Transport, prepared by Peter McDonald, dated 24 August 2026.

The Section 42A reports make recommendations on the Greater Wellington submission points allocated to the Infrastructure hearing. Greater Wellington supports the recommendations made by the Section 42A reporting officers as set out in Appendix 1 to this letter.

Greater Wellington appreciates the opportunity to be involved in the PDP process. Should there be any queries raised in relation to the matters set out in this letter, please feel free to contact me at the below address.

Ngā mihi nui.

Nāku, nā,



Erica Wheatley

Senior Policy Advisor
Environmental Policy Team

Email: Erica.wheatley@gw.govt.nz

Email: regionalplan@gw.govt.nz

Mobile: 021 439 421

Enclosed: Appendix 1 – Greater Wellington Regional Council submission points addressed in
Hearing 6 – Infrastructure.

Appendix 1: Greater Wellington Regional Council submission points addressed in Hearing 6 – Infrastructure

Submitter	Submission point	Provision	Support / oppose	Requested relief	S42A recommendation	Greater Wellington response to S42A recommendation
Infrastructure						
Wellington Regional Council	452.9	New definition: "Maintain / maintenance and repair"	Amend	"Means any work or activity necessary including replacement or renewal where the effects remain the same or similar in character, intensity and scale, to continue the operation and/or functioning of the existing structure or infrastructure or renewable electricity generation activities or electricity transmission activities. This does not include upgrading."	Accept in part	Accept reporting officer's recommendation to adopt a definition that aligns with the Wellington District Plan 2024.
Wellington Regional Council	452.17	INFSD-O1	Support in part	"Land use and development is integrated with the provision of infrastructure, including transport and three waters services, <u>green infrastructure</u> and open space."	Reject	Accept the reporting officer's reasoning that RPS direction on green infrastructure is sufficiently implemented elsewhere in the PDP - consistent with the S42A reporting officer's recommendation and GW's tabled statement for Hearing Stream 1.
Wellington Regional Council	452.25	UDSD-O4	Support	Retain as notified	Accept in part	Support reporting officer's recommendation
Wellington Regional Council	452.31	Infrastructure Chapter Introduction	Support in part	Green infrastructure and flood mitigation works (Natural Hazards chapter)	Accept in part	Accept the reporting officer's reasoning that the INF chapter provides for green infrastructure to the extent it is part of a stormwater network and that this be clarified in the introduction.
Wellington Regional Council	452.33	INF-O1	Support in part	INF-O1 Benefits of infrastructure <u>and green infrastructure</u> : "The national, regional and local benefits of infrastructure <u>and green infrastructure</u> are recognised and provided for."	Reject	Accept the reporting officer's reasoning that the INF chapter provides for green infrastructure to the extent it is part of a stormwater network and mimics or incorporates natural features or processes and recommended amendments to INF-P1 to recognise this.
Wellington Regional Council	452.34	INF-O3	Support in part	Enable safe, resilient, sustainable, responsive and efficient infrastructure that is well integrated with, and able to meet the needs of, subdivision, use, and development., <u>prioritising the use of green infrastructure as far as practicable</u>	Reject	Accept this amendment is not necessary given the reporting officer's recommended relief on INF-P1.
Wellington Regional Council	452.35	INF-P1	Support in part	INF-P1 Recognise benefits of infrastructure <u>and green infrastructure</u> Recognise the social, economic, cultural and environmental benefits that infrastructure, <u>particularly green infrastructure</u> , provide, including: ... 5. Enabling growth, <u>access</u> and development, ...	Accept in part	Accept the reporting officer's reasoning that the INF chapter provides for green infrastructure to the extent it is part of a stormwater network and recommended amendments to INF-P1 to recognise this.

Submitter	Submission point	Provision	Support / oppose	Requested relief	S42A recommendation	Greater Wellington response to S42A recommendation
Wellington Regional Council	452.36	INF-P2	Support in part	INF-P2 Provide for infrastructure and green infrastructure: 1. Enabling safe, resilient, effective, and efficient operation, maintenance, repair, minor upgrade, or decommissioning of infrastructure and green infrastructure; 2. Providing for other upgrades to, and the development of new infrastructure and green infrastructure, and; 3. Enabling investigation and monitoring activities associated with infrastructure and green infrastructure operations	Reject	Accept the reporting officer's reasoning that the INF chapter provides for green infrastructure to the extent it is part of a stormwater network and the defined term "infrastructure" adequately covers the relevant considerations in INF-P2.
Wellington Regional Council	452.37	INF-P3	Support in part	INF-P3 Planning and delivery of infrastructure and green infrastructure: Add reference to green infrastructure to each clause alongside reference to infrastructure	Reject	Accept the reporting officer's reasoning that the INF chapter provides for green infrastructure to the extent it is part of a stormwater network and the defined term "infrastructure" adequately covers the relevant considerations in INF-P3.
Wellington Regional Council	452.38	New provision: "INF-PX"	Amend	INF-PX Promote the use of green infrastructure: Promote and support the integration of green infrastructure as part of subdivision, use and development to provide services for people and communities while improving ecosystem health, resilience and indigenous biodiversity	Reject	Accept this provision isn't necessary given the reporting officer's recommended relief on INF-P1.
Wellington Regional Council	452.39	INF-P7	Support in part	Amend clause 3b: Allocating adequate space in the road corridor for walking, cycling, public transport infrastructure, streetlighting and street trees as well as vehicles (including public transport vehicles) and on-street parking (where appropriate), and...	Accept in part	Support reporting officer's recommendation
Wellington Regional Council	452.40	INF-S15	Support	Retain as notified.	Accept in part	Support reporting officer's recommendation
Renewable Electricity Generation						
Wellington Regional Council	452.41	Whole chapter	Support in part	Seeks that the REG chapter including objectives, policies, rules, and standards are amended to implement RMA s6 and s31, the NZCPS, NPSFM, and RPS Change 1 requirements.	Reject	Accept the reporting officer's reasoning that these higher order documents are primarily addressed through other relevant chapters in the Plan insofar as possible within the context of the current Plan Stop provisions and the scope of the exemption granted to the Plan to proceed.
Three Waters						
Wellington Regional Council	452.43	THW-O1	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.44	THW-O2	Support	Retain as notified	Accept	Support reporting officer's recommendation

Submitter	Submission point	Provision	Support / oppose	Requested relief	S42A recommendation	Greater Wellington response to S42A recommendation
Wellington Regional Council	452.45	THW-P1	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.46	THW-P2	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.47	THW-P3	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.48	THW-P4	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.49	THW-P5	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.50	THW-R1	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.51	THW-R2	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.52	THW-R3	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.53	THW-R4	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.18	INFSD-O6	Support in part	INFSD-O5: Water Sensitive Design <u>Green Infrastructure</u> New development integrates green infrastructure, including water sensitive design, to protect or improve environmental freshwater quality and provide other benefits such as avoiding or mitigating the risks of flooding, increasing the resilience of people and infrastructure to the effects of climate change.	Reject	Accept the reporting officer's reasoning that this would be a significant reframing of the objective and water sensitive design is not always a form of green infrastructure, and that RPS direction on green infrastructure is sufficiently implemented elsewhere in the PDP.
Wellington Regional Council	452.8	Definition: "Hydraulic neutrality"	Support in part	Amend the definition of hydraulic neutrality to specifically refer to the "10% annual exceedance probability and 1% annual exceedance probability modelled design rainfall events including the predicted impacts of climate change"	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.15	New definition: "Undeveloped state"	Amend	<u>Means the modelled grassed (pastoral or urban open space) state of the site prior to urban development</u>	Reject	Note that the term "undeveloped state" is not used in the Plan and is therefore not a useful addition.

Transport						
Wellington Regional Council	452.13	Definition: "Travel choice assessment"	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.54	Transport chapter (whole)	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.55	Transport Chapter Introduction	Support in part	The safety and efficiency of transport facilities (such as cycle and motor vehicle parking facilities, <u>bus stops and shelters</u> , vehicle access, loading facilities, and on-site manoeuvring areas makes a significant contribution to the overall safety and efficiency of the transport network	Reject	Accept reporting officer's reasoning that the defined term "transport facilities" adequately captures bus stops and shelters and this amendment is not required.
Wellington Regional Council	452.56	TR-O1	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.57	TR-P1	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.58	TR-P2	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.59	TR-P3	Support in part	Amend clause 1c: For any shortfall in the provision of loading spaces, cycling parking or end-of-trip facilities, the projected demand for the facilities <u>can be demonstrated to will</u> be lower than that required to be provided in the standards, or can be accommodated by public, shared, or reciprocal arrangements...	Reject	Accept the reporting officer's reasoning that the current wording is appropriate at the policy level and is supported by the associated rule and standard, and where there is a cycle parking shortfall, the onus is on the applicants to demonstrate that effects are acceptable including through reference to policy direction.
Wellington Regional Council	452.60.	TR-P4	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.61	TR-P5	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.62	TR-P6	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.63	TR-P7	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.64	TR-R1	Support	Retain as notified	Accept	Support reporting officer's recommendation

Wellington Regional Council	452.65	TR-R2	Support	Retain as notified	Accept in part	Support reporting officer's recommendation
Wellington Regional Council	452.66	TR-R3	Support	Retain as notified	Accept in part	Support reporting officer's recommendation
Wellington Regional Council	452.67	TR-R4	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.68	TR-S2	Support	Retain as notified	Accept	Support reporting officer's recommendation
Wellington Regional Council	452.69	TR-S3	Support	Insert new clause 1.e. and 1.f. as follows: <u>e. Be well lit with an illuminance value of no less than 20 lux at floor level, and</u> <u>f. Be on level ground</u>	Reject	Accept the reporting officer's reasoning that the phrase "at ground level" could be misinterpreted to preclude wall-mounting and prevents other solutions that may be viable, and requiring specific lighting level may incur additional costs associated with higher design requirements that are better addressed as part of a CPTED urban design assessment that would generally support a consent application rather than being included as a transport standard.