

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT WELLINGTON**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE  
TE WHANGANUI-A-TARA**

<b>IN THE MATTER</b>	<b>of the Resource Management Act 1991</b>
<b>AND</b>	
<b>IN THE MATTER</b>	<b>of the hearing of submissions on the Greater Wellington Regional Council's Proposed Change 1 to the Regional Policy Statement</b>

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**LEGAL SUBMISSIONS ON BEHALF OF  
KĀINGA ORA – HOMES AND COMMUNITIES**

**HEARING STREAM 2**

**3 JULY 2023**

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**Instructing solicitor:**  
C E Kirman  
Special Counsel  
Kāinga Ora - Homes and Communities  
PO Box 14594  
Central Auckland 1051  
E: [claire.kirman@kaingaora.govt.nz](mailto:claire.kirman@kaingaora.govt.nz)

**Counsel Instructed:**  
N M H Whittington  
Hawkestone Chambers  
PO Box 12091  
Thorndon  
Wellington 6140  
E: [nick.whittington@hawkestone.co.nz](mailto:nick.whittington@hawkestone.co.nz)

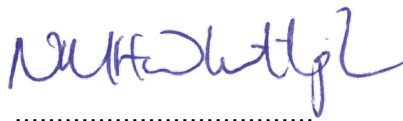
## 1. KĀINGA ORA – HOMES AND COMMUNITIES

- 1.1 This brief submission is lodged on behalf of Kāinga Ora – Homes and Communities (“Kāinga Ora”) in relation to one submission point, S158.003.
- 1.2 The Kāinga Ora submission sought that para (f) of Objective A, the overarching objective, be amended to read “(f) “is resilient to the likely current and future effects of climate change.”
- 1.3 The section 42A report writer has recommended instead that it be amended to read “(h) responds effectively to the current and future effects of climate change, and population growth and development pressures and opportunities.”
- 1.4 Kāinga Ora acknowledges that its submission has been accepted in part by the reporting officer and the term “effects” has been used, which Kāinga Ora considers to be more consistent with RMA terminology.
- 1.5 Nonetheless, Kāinga Ora does not consider this to be an appropriate or effective outcome. The objective’s structure and syntax is not assisted by the numerous “ands” which make it unclear which adjectives modify which nouns. I assume that the paragraph is intended to mean that the integrated management of the region’s natural and built environments is to respond to:
  - (a) The current and future effects of climate change; and
  - (b) Population growth; and
  - (c) Development pressures and opportunities.
- 1.6 If so, it needs a comma after “growth”. Otherwise it reads as if the opportunities are not related to development. It may be preferable to set the component parts out as a list in the form above.
- 1.7 Kāinga Ora acknowledges that population growth and development pressures are appropriate to respond to in an integrated manner, but

seeks a clearer structure to the objective to differentiate between climate change, and growth and development.

- 1.8 As such, Kāinga Ora considers and seeks that the most appropriate wording based on the understood intent of the objective is: “(h) responds effectively to the current and future effects of climate change, population growth, and development pressures.
- 1.9 Notwithstanding the relief sought above, Kāinga Ora wishes to note for the panels’ consideration, that “responds to” does not provide an effective objective. It does not provide any direction as to the nature of the response. The response could be positive or adverse. Arguably, not responding to something is a response. With respect, specifying “resilience” provides a more appropriate and effective objective.
- 1.10 Kāinga Ora does not seek to be heard orally.

Date: 3 July 2023



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Nick Whittington