

The closing date for submissions is 5pm Friday 14 October 2022.

### How to make a submission:

- Online at [www.gw.govt.nz/rpschange1](http://www.gw.govt.nz/rpschange1) using the *Spoken* submission portal.
- Email your submission and this form to us at: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)
- Post your submission and this form to us at: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser
- Drop your submission and this form to reception at one of Greater Wellington's offices.

**Privacy statement** – To read our Privacy Statement please visit:

<https://www.gw.govt.nz/assets/Documents/2022/08/Privacy-Statement-RPS-Change-2022.pdf>

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Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region.

## 1. Details of submitter: Name(s) and Address for service

Name (First and Last) OR  
Organisation / Company:

Phone:

Address for service:  
(Physical Address OR Email)

Contact person for submission:  
(If different to above)

I wish to be heard in support of my submission at a hearing:

Yes  No

I would consider presenting a joint case at the hearing with others who make a similar submission:

Yes  No

## 2. Disclosures:

I could gain an advantage in trade competition through this submission:

Yes  No

*Only answer this question if you ticked 'yes' above:*

Yes  No

I am directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

*Note: If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

**I confirm that I have permission to provide this information,  
and that I have read and understood the Privacy Statement:**

Signature



Date

### 3. Submission:

Multiple provisions can be commented on within the following section. Feel free to use additional pages if necessary.

The specific provisions of the proposal that my submission relates to are:

<b>Provision (i.e. issue, objective, policy, method, definition)</b>	<b>Support/Oppose</b>	<b>Decision Sought</b> <i>What changes you would like to see?</i>	<b>Reasons</b> <i>Please provide reasons for your views</i>

# Submission on Proposed Plan Change 1

## Regional Policy Statement for the Wellington Region

### INTRODUCTION

Winstone Aggregates (a division of Fletcher Concrete and Infrastructure) is the leader in aggregate products and services in New Zealand, operating eleven extractive quarries, two joint venture quarries, four managed fills/clean fills, six laboratories and a transportation fleet. In the Wellington Region, Belmont Quarry and Otaki Quarry are our largest operations, with smaller operations at Petone, Dry Creek, Kapiti and Waikanae.

Aggregates are generally recognised as regionally significant resources in regional policy statements across NZ. In many instances, this significance is then unfortunately diminished and diluted throughout regional and district plans, to a level that places the quarrying industry in a position of constantly battling through the consenting process.

The aggregates sector needs support from local government by designing a legislative environment that allows us to supply quarry materials for affordable housing and infrastructure both now and in the future. In order to do this, it is critical that the regional policy statement acknowledges the importance of aggregate to Greater Wellington's economy; that the consenting process is both enabling and streamlined; and quarry resources are protected from sterilisation and reverse sensitivity effects.

#### **Better Provision for Aggregates**

Proposed Plan Change 1 purports to give effect to the National Policy Statement on Urban Development (May 2022 update), noting a further 41,549 homes are required in the Region under the Wellington Region Housing bottom lines in the short-medium term 2021-2031 and 62,221 in the long term.

Winstone considers that Proposed Plan Change 1 (PPC1) should more clearly provide for the production and supply of aggregate and associated products as a vital ingredient to build and deliver those homes and infrastructure that will deliver a well-functioning urban environment.

Aggregate is essential in the creation of new and the on-going maintenance of housing, business, roads, cycleways and three waters infrastructure. Without strong recognition of the importance of Region's Significant Mineral Resources at an RPS level and the regional direction in the RPS as to how to enable/ allow for continued development and use of the Region's significant quarries, it will become impossible to obtain new consents required for aggregate extraction in the Region.

The need for local supply of aggregate has been recently felt as a result of supply issues due to the COVID-19 pandemic which has been widely recognised as contributing to housing unaffordability. As aggregate is a mineral, quarries do not have the choice of location. They must locate where the resource is located, and that resource under the ground needs to be accessible. Much of the accessible aggregate resource within western Wellington region (this side of the Remutaka Range) has been exhausted or sterilised, due to urban development of the land, the current use of the land or legal protections of natural features upon the land that make quarrying difficult/impossible.

The main source of aggregate for the western Wellington region is now at Belmont Quarry. There are smaller deposits at Horokiwi and Kiwi Point quarries. To get that aggregate to where it will be used, it must be transported, therefore there are both cost and transportation/climate change considerations to ensuring that quarries continue to operate local quarries in locations within close proximity to the end use of the aggregate.

Aggregate is also used as part of the region's approach to climate change, whether it is coastal protection or rebuilding as a result of slips, flooding, or building more resilient cycling/transport infrastructure. While Winstone support the direction of the plan towards climate adaptation, the importance of aggregate in that response, and increasing the region's resilience (or any earthquake response) should not be downplayed.

Ad-hoc/sporadic or uncontrolled development is one threat restricting access to significant physical resource. However, obtaining resource consents to access and extract aggregate, and dispose of the necessary overburden/cleanfill within or adjacent to quarry sites has become the single biggest barrier to aggregate production in the region, and represents the biggest risk to continued provision of aggregate to the region. Land set aside for quarrying is becoming sterilised as a result of planning protections placed on the land above, making it impossible to extract the resource below. Quarry sites may contain natural wetlands, streams, and indigenous vegetation which are increasingly protected on the surface of the site.

The proposed changes to the indigenous biodiversity provisions are entirely unworkable for aggregate extraction. Offsetting and compensation are important tools in the effects management hierarchy and restricting their use will result in unintended consequences, particularly for developments that provide the potential for significant ecological gains overall, via offsetting. These do not appear to have attempted to provide any recognition for the Exposure Draft of the NPS-FW (update) and draft NPS-IB both containing amendments that provide more viable pathways for mineral extraction.

Winstone request that the RPS via PPC1 contains an updated policy framework and clear policy directives that provide and support an appropriate enabling consenting pathway for aggregate extraction and associated quarrying activities such as overburden placement in a similar to that of Regionally Significant Infrastructure. It is considered that this approach would better give effect to the recognition and management of aggregate extraction activities as set out in the NPS-FW (including the anticipated 2022 update) and draft NPS-IB.

The Natural Resources Plan (NRP) includes a policy framework that specifically recognise the criticality of significant mineral and aggregate resources for the Wellington Region (including Objectives 9 and 11 of the NRP). However, the RPS does not currently provide consistent direction recognising the social, economic, cultural and environmental benefits of the utilisation of mineral and aggregates resources or the protection of land containing significant aggregate resources.

The plan provides very little guidance as to how local authorities plans should manage conflicting considerations where mineral and aggregate resources are involved, and so a framework recognising the benefits of mineral and aggregate resources is important.

**Relief sought:** Amend the RPS to provide recognition and protection for significant mineral resources in a way that is consistent with the policy framework in the NRP and consistent with the NPS-FW (update) and NPS-IB when those documents are confirmed. Winstone would be happy to work further with GWRC to accurately and appropriately reflect the NRP policy direction in the RPS.

### **The need for aggregate when implementing the NPS-UD**

Winstone is concerned that Plan Change 1 seeks to address issues such as housing supply and infrastructure pressures, as a result of the NPS-UD but that the provisions of the Plan Change will decrease our access and ability to supply the aggregate required to address these problems.

In the absence of policy recognition of the fundamental importance of mineral extraction and clean fill activities and contribution these materials make to construction and development, it will be difficult for housing and industry providers to meet the region's needs at a reasonable cost and for reducing waste to landfill.

***Relief sought:*** *Specific provision is made for aggregate and clean filling in PC1 to recognise the vital importance of these activities that underpin growth sought by the NPS-UD and provide Regional direction as to how the conflicts between NPS-FW and NPS-IB matters must be balanced.*

### **Implementation of the NPS-FM**

The Plan Change introduces a number of new policies aimed at implementing the NPS-FM, which in fact do not properly give effect to the NPS-FM and PC1 does not appear to have amended/added new definitions to implement the NPS-FM.

In particular it appears that the RPS does not implement section 3.22 of the NPS-FM, which relates to natural inland wetlands and which every Regional Council needs to 'give effect to' in their regional plan. The RPS should therefore provide consistent direction to what is required by the NPS-FM, and implemented in the Natural Resources Plan (NRP).

***Relief sought:*** *Winstone requests that:*

- *The RPS amendments are updated to accurately reflect the direction sought by the NPS-FM,*
- *The NPS-FM is given effect to in the NRP*
- *New definitions are inserted into the RPS that reflect and are consistent with the NPS-FM definitions and the expected NPS-FM Update (due for release in December 2022).*

### **Use of Freshwater Planning Process**

Winstone is concerned with the breadth of the Plan Change content that is subject to the Freshwater Planning Process (FPP), rather than the Schedule 1 process. The FPP process provides limited scope for future public input, and a large number of provisions are subject to the FPP where freshwater is not the primary issue, and is instead peripheral or only one of several issues to which the provision relates. Winstone is very concerned with this approach and considers that it is an inappropriate use of the FPP process.

***Relief sought:*** *Winstone requests that the scope of the FPP versus Schedule 1 processes is reviewed and that only those provisions where freshwater is the primary issue are subject to the FPP.*

### **Appropriate Recognition of the Draft NPS-IB**

The Draft NPS-IB Clause 3.11 lists the exceptions to clause 3.10(2)(a)(i) – one of those exceptions is mineral extraction – the RPS does not appear to refer to the exceptions and how effects coming within those exceptions should be managed a new objective and policy is required to do so.”

**Relief sought:** Winstone seeks that the RPS be amended to provide new objectives and policies and methods that provide for these exceptions in the Draft NPS-IB.

## PROPOSED CHANGE 1

Winstone Aggregates makes submissions on specific provisions in Plan Change 1 as per the table below.

Provision	Comments
Chapter I3.1A Introduction – Objective A	<p>There is a lack of recognition of mineral extraction activities in this important introductory objective. Continued access to mineral resources in close proximity to market is required to achieve the goals of increasing the housing supply, maintaining and improving infrastructure and minimising carbon emissions.</p> <p><b>Relief:</b> Propose a new bullet which reflects Objectives O9 and O11 in the NRP as follows –</p> <p><i>‘(f) recognises the benefits of protecting and utilising the regions significant mineral resources.’</i></p>
Policy 18: Protecting <del>and restoring aquatic</del> ecological <del>function</del> <u>health</u> of water bodies – regional plans	<p>Policies (e) and (n) are at odds – (e) requires avoidance of the loss of river extent, while (n) restricts reclamation, piping, straightening or concrete lining of rivers – each of which is a method for losing extent of rivers.</p> <p>An ‘avoid’ policy is a coarse tool and does not allow for consideration of potential broader ecological outcomes, where significant ecological benefits may be achieved from a project that might require loss of some extent of river. There is potential for significant unintended consequences from this policy, as previously explored during the mediation sessions of the NRP covering P102.</p> <p>The wording of Policy 7 (The loss of river extent and values is avoided to the extent practicable) in the NPS-FM has been incorrectly interpreted by (e) as a straight avoid policy, which it is not.</p> <p><b>Relief:</b> Amend the wording of (e) to the following –</p> <p><i>‘(e) <del>avoiding</del> the loss of river extent and values is avoided <u>where practicable</u>.’</i></p> <p>Amend the policy to more accurately reflect the requirements of the NPS-FM and NES-F.</p>
Policy 23: Identifying indigenous ecosystems and habitats with	<p>This policy requires identifications of ecosystems and habitats with significant indigenous biodiversity values by 2025. However, there is no policy that requires plans to manage effects on these areas in any way.</p>

<p>significant indigenous biodiversity values – district and regional plans</p>	<p>Policy 24 relates to the ecosystems in Appendix 1A, rather than linking with Policy 23.</p> <p>The RPS seeks to implement the Exposure Draft of the NPS-IB. Winstone is concerned about the extent that the RPS seeks to implement a draft version of the NPS-IB that will inevitably change before coming into force and questions the timing of these amendments.</p> <p>There is no requirement to give effect to a draft NPS-IB. Policy package 2 identified in the s32 Report would have been more appropriate, which maintained status quo until the NPS-IB content has been confirmed (s32 page 132), particularly given the high cost and complexity of assessment and impact on property owners and short timeframe that the RPS introduces (June 2025 which is 2.5 years less than the proposed NPS-IB) for Councils to map and identify these areas. Meeting “objectives” earlier is not a benefit when those objectives at a National level remain uncertain. It is unclear if Policy 23 gives effect to the Draft NPS-IB.</p> <p>There is often direct conflict between areas of land that contain regionally significant mineral deposits and land that contains significant indigenous biodiversity values due to this land being set aside for future aggregate extraction. The s32 evaluation fails to consider the costs of this.</p> <p>The s32 report (p191) states that the direction to local authorities to identify significant biodiversity values has been in the RPS since 1995, but this has not occurred. It also fails to mention that the RPS Method 52 currently provides for GWRC mapping of regionally significant minerals deposits, which also has not yet taken place. Winstone seek that this work be completed by GWRC and a better framework developed to recognise the importance of access to aggregate and role in growth.</p> <p>Policy 23 does not currently contain defined terms and no amendments are proposed to the wording of most of the policy. However it deals with concepts that are likely to be impacted by proposed new definitions in Appendix 3 terms for example Policy 23(d)(i) deals with ecological assessment of an area, including the extent the ecosystem ‘enhances connectivity.’ It is unclear how this relates to the new definition of <i>ecological connectivity</i>, same can be said for the proposed new definitions of <i>ecological integrity</i>, <i>ecological health</i>, <i>naturally uncommon ecosystems</i> it is unclear how these interact or impact on how policy 23 will be interpreted.</p>
	<p><b>Relief sought:</b> Reject the proposed changes to this policy.</p> <p>Undertake mineral mapping at the same time as the SNA mapping and ensure that a viable pathway being provided for quarrying and clean filling activities within those identified areas.</p>

Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans

There are significant issues with the proposed policy, including–

- It is worded as a method, not a policy and therefore it is inappropriate to include in the policy framework.
- It is unclear how this links with Policy 23 – are the ecosystems and habitats identified in Appendix 1A done so in accordance with Policy 23, or additional to that Policy? The reference to Policy 23 in the explanation fails to clarify this.
- The basis for limiting offsetting and compensation is unclear. There is no national direction requiring these limits and there is no justification provided in the s32 report.
- The language used in Policy 24 and the proposed method “no appropriate” “knowledge,” “proven methods,” species “known” is uncertain and introduces a subjective standard into a complex area which is inappropriate. It also removes the ability for even low risk adaptive management and new methodology/advances in ecological understanding.
- Policy 24(a)(i) could be interpreted to suggest that where a district council does not have the necessary ecological expertise, it should not provide for offsetting in its district plan–therefore making it unavailable to all applicants.
- The wording in the explanation is equally confusing and uncertain in terms of “same,” “or similar” calculation methodology. Implementation of these policies at a district level will result in provisions that will arguably prevent reasonable use of private land. Council has a duty to ensure that there is certainty as to when these limits are intended to apply.
- The list in Appendix 1A covers an enormous area of the region and limiting the use of offsetting and compensation in these areas has the potential to effectively halt any large-scale (and a lot of small-scale) development entirely, sterilising these sites. It would therefore appear that Policy 24 seeks the creation of a new raft of prohibited activities for activities where effects could not be avoided or mitigated, and would not allow for a site-specific consideration of effects, nor for consideration of other competing matters. The evidential basis for this approach is unclear and is not described in the s32 report.
- Taking an ‘species based’ blanket approach is entirely inappropriate.
- The explanation in Appendix 1A provides greater clarity as to how Policy 24 is intended to operate than the explanation to Policy 24 itself. If retained, the wording in Appendix 1A should be shifted into Policy 24.

The s32 report does not acknowledge the potential significant costs of the policy from the limits it would place on key developments, including infrastructure and mineral extraction. It describes Policy 24 (p191 s32) as a “regional interpretation”



	<p>for the limits to the use of biodiversity offsetting and compensation is entirely unwarranted. It is unclear what this means and why this has been applied.</p>
	<p><b>Relief sought:</b> Reject the proposed changes to this policy and delete any corresponding references to it.</p>
<p>Policy 39:</p>	<p>The benefits of recognising regionally significant mineral resources has been completely missed. Winstone Aggregates successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.)</p> <p>This policy is a good fit for including significant mineral resources (as reflected in Policy P15 of the NRP) and will guide good decision making in future plans.</p> <p><b>Relief:</b> Amend the title of Policy 39 to the following –</p> <p><i>‘Policy 39: Recognising the benefits from renewable energy, regionally significant infrastructure and mineral resource utilisation – consideration.’</i></p> <p>Amend (b) and (c) to the following –</p> <p><i>‘(b) protecting regionally significant infrastructure and significant mineral resources from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure <u>or mineral resource</u>; and</i></p> <p><i>(c) the need for renewable electricity generation facilities <u>and quarrying activities</u> to locate where the <del>renewable energy</del> resources exist; and...’</i></p> <p>That the explanation to this policy is amended to recognise the benefits of aggregate in and outside of the region to growth.</p>
<p>Policy 40:</p>	<p>There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing.</p> <p>Clause (h) is not very specific in that it does not provide clear guidance for what is considered ‘significant indigenous ecosystems and habitats’. It is not clear what other ecosystems and habitats might be captured by this policy, other than those listed in Appendix 16. The policy should either clearly link to the criteria in Policy 23 or provide</p>

	<p>another mechanism for clearly identifying ‘significant indigenous ecosystems and habitats’, until these are fully identified by regional and district councils as required by Policy 23.</p> <p>Clause (n) appears to adopt an avoid approach to the removal or destruction of natural indigenous plants in wetlands (despite there not being a strict avoid requirement in the NPS-FM/ NES.</p> <p>The explanation to this policy purports to give effect to the NPS-FM but doesn’t achieve that. Any wording (if retained or aligned with Policy 18) needs to be amended to reflect the NPS-FM 2020 NES and any update.</p>
	<p><b>Relief sought:</b> Align wording with Policy 18 or delete if it is repetitious.</p> <p>Amend wording to provide clear guidance on what constitutes significant indigenous ecosystems. This could be achieved by linking to the criteria in Policy 23.</p> <p>Amend the policy to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update.</p>
<p>Policy 41: <u>Controlling</u>  <del>Minimising</del> the effects of earthworks and vegetation disturbance</p>	<p>Winstone generally supports this policy and requests minor amendments for consistency between the heading and the policy text.</p>
	<p><b>Relief sought:</b> Policy 41: <del>Controlling</del> <u>Managing</u> the effects of earthworks and vegetation disturbance</p>
<p>Policy 47:</p>	<p>Winstone generally supports the changes to clause (g) of this policy.</p> <p>Request removal of (i) for the reasons described in Policy 24 summary.</p> <p>Winstone also queries whether there are changes to how this policy operates due to insertion of proposed new definitions.</p>
	<p><b>Relief sought:</b> Reject changes to clause (i)</p> <p>Remove reference in the explanation to Policy 24, ensure any proposed new definitions do not alter the original way in which Policy 47 applies.</p>
<p>Policy 55</p>	<p>The amendments to this policy fail to recognise the importance of protecting regionally significant quarries/mineral/aggregate resource as provided in Policy 60 and Objective 30 RPS.</p>
	<p><b>Relief sought:</b> add new criteria (9) to the policy:</p> <p><i>9) ‘Protecting Regionally Significant Mineral/Aggregate Resources from inappropriate development.’</i></p>
<p>Policy 64:</p>	<p>Winstone generally supports for Policy 64 with minor amendments to the policy heading.</p>

	<p><b>Relief sought:</b> Policy 64 – <u>Supporting and encouraging</u> Promoting efficient use and conservation of resources – non-regulatory.</p>
<p>Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation.</p>	<p>The introduction states that <i>‘the setting of limits to the use of offsetting is one of the ten internationally accepted principles of biodiversity offsetting...’</i>. The changes proposed via PPC1 incorrectly interpret this principle are at odds with RMA, case law and direction of the Draft NPS-IB (which may or may not become operative), Limiting the total offset to 10% of effects is a crude way to apply limits and in practice will limit and/or prevent opportunities for significant biodiversity gains from our quarrying projects.</p> <p>Limiting offset based entirely on presence of species is inappropriate. The costs and benefits of this approach coupled with Policy 24 have not been properly considered or evaluation in the s32 report. It is unclear what the evidential basis is for the species list inclusion or the information that fed into the cost and benefit evaluation.</p> <p>The proposed changes effectively mean that Winstone’s will be unable to use offsetting or compensation in the most common situations where they are most likely to be required, sterilising the aggregate resource and leaving no pathway for quarrying in these circumstances despite the need to occur where the resource is based.</p> <p><b>Relief sought:</b> Winstone opposes this appendix in its entirety and request that it is deleted, together with rejection of changes to Policy 24.</p>
<p>New definition: QUARRYING ACTIVITIES</p>	<p>Should the proposed relief for Policy 39 be accepted, the term quarrying activities can either be explicitly provided for in the RPS or otherwise be as defined in the National Planning Standards. This will address the concerns we have regarding the RPS being silent on clean filling activities and recognition that extraction requires associated activities.</p> <p><b>Relief sought:</b> Provide a new definition as follows –</p> <p><i>‘Quarrying activities means the extraction, processing (including crushing, screening, washing, and blending), transport, storage, sale and recycling of aggregates (clay, silt, rock, sand), the deposition of overburden material, rehabilitation, landscaping and clean filling of the quarry, and the use of land and accessory buildings for offices, workshops and car parking areas associated with the operation of the quarry.’</i></p>

<p><b>Appendix 3 New Definitions – general comment</b></p> <ul style="list-style-type: none"> <li>• <i>Biodiversity Compensation;</i></li> <li>• <i>Biodiversity Offsetting;</i></li> <li>• <i>Ecological connectivity;</i></li> <li>• <i>Ecological Integrity;</i></li> <li>• <i>Ecosystem Health ;</i></li> <li>• <i>Enhancement (in relation to indigenous biodiversity);</i></li> <li>• <i>Maintain/ Maintained/ Maintenance</i></li> <li>• <i>Naturally uncommon ecosystems;</i></li> <li>• <i>Nature Based Solutions;</i></li> <li>• <i>Organic Waste;</i></li> <li>• <i>Protect (in relation to Indigenous Biodiversity);</i></li> <li>• <i>Resilience (ecosystem)</i></li> <li>• <i>Restoration</i></li> <li>• <i>Threatened ecosystems or species</i></li> </ul> <p><b>Oppose/Neutral</b></p>	<p><b>Winstone is opposed/ neutral to the inclusion of the listed new definitions. It is unclear where some of these defined terms have come from or what the basis is for defining these terms in this way. Some do not appear to reflect up to date caselaw, the RMA or even the draft NPS-IB. Others appear to reflect NRP definitions but it is unclear how these change the interpretation of the RPS policies.</b></p> <p>Winstone is concerned about seeking to adopt the draft NPS-IB definitions in advance of these being settled. There is insufficient information contained in the s32 evaluation to understand how the impact of these definitions or how they will impact original wording and policies as well as proposed objectives, policies and methods. Further information and evidence as to how these have been developed is requested.</p> <p>Winstone is concerned that the definitions take an overly restrictive approach, may have unintended consequences and seeks amendments be made to ensure that the definitions are in line with the NPS and RMA caselaw and ensure that there is a viable and workable pathway to continue to undertake /consent quarrying activities.</p> <p><b>Relief sought:</b> any amendments required to address the submitters concerns set out above or consequential amendments required to the policies, objectives and methods than refer to these definitions.</p>
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<p><b>New definitions, including definitions required by the NPS-FM</b></p>	<p>Winstone notes that the new definitions appear to be focused on indigenous biodiversity and do not appear to introduce definitions required by NPS-FM. This appears to be inconsistent. The introduced policies and objectives in PPC1 do use terms referred to and defined in NPS-FM and therefore those terms should be included and defined in the RPS.</p> <p><b>Relief sought :</b> NPS-FM definitions and any updated definitions are added to the plan.</p>
<p>Policy 33</p>	<p>Winstone supports the intent of this Policy in that it aims to provide well-functioning urban environments and a reduction in transport related greenhouse gases.</p> <p>Winstone consider that a clearer link be provided between this policy and Objective 30, so seek amendment to better recognise that the demand for mineral resources is met with the resources located in close proximity to the areas of demand. Quarrying aggregate that is located near the product use point reduces transport cost and emissions is a key factor in enabling development within the region.</p> <p><b>Relief sought:</b> further amend Policy 33 and the accompanying explanation to provide for the benefits of use of local quarrying/local aggregate supply as an ingredient in well-functioning urban environments and reduction in transportation emissions in the Wellington Regional Land Transport Plan.</p>
<p>Policy CC.2: Travel demand management plans – district plans</p>	<p>Winstone is neutral on the intent of this policy, however suggests that these plans recognise that quarrying must locate where there is accessible resource, and that aggregate providers have very little control over where its customers seek to transport the aggregate to once it leaves the gate.</p> <p>Development/Construction activities seeking consent should be encouraged to source materials from local aggregate source in an effort to reduce their emissions.</p> <p><b>Relief sought:</b> Exclude quarrying activities from the requirement to provide travel demand management plans.</p>
<p>Policy 7</p>	<p>Winstone supports the intent of this policy but seeks an addition to recognise the benefits of regionally significant mineral resources and aggregate quarries. This is consistent with the outcome on appeal in the NRP Objectives 9 and 11.</p> <p><b>Relief sought:</b> Amend the policy as follows:</p>

	<p>(a) <u>The social, economic, cultural and environmental benefits of regionally significant infrastructure and significant mineral resources, and in particular low and zero carbon regionally significant infrastructure including:</u></p> <p>...</p> <p><u>(v) a secure supply of aggregate is available for development within the region.</u></p>
<p>Chapter 3.9 Regional Form Design and Function – Introduction and Issue 2</p>	<p>Winstone note that this chapter and section references all of the aspects of building, growth and construction apart from the supply of the material and where that comes from. Winstone seeks amendments to the Chapter Introduction to include reference to aggregates, providing a link to Objective 30 of the RPS and to make provision for the need to locally supply aggregate in order to minimise the cost of housing and road production.</p> <p>Winstone also seeks amendments to Issue 2 in the Introduction to specifically recognise the need to locally supply aggregate in order to minimise the cost of housing and infrastructure development.</p> <p>Winstone also notes that the chapters lists issues of significance to the Wellington region’s iwi authorities, and queries whether this should refer to <u>local and</u> iwi authorities.</p> <p>The issues statement in the Chapter Introduction has a single reference to aggregate, but it appears under the heading ‘<i>Sporadic, uncontrolled and/or uncoordinated development</i></p> <p>...</p> <p><i>‘development in locations that restrict access to the significant physical resource in the region -such as aggregate.’</i></p> <p>Winstone supports recognition of this issue and requests that the Regionally Significant Aggregate Deposits are identified along with the surrounding area as to not sterilise the resource. This includes recognition of the extraction of the resource itself but also activities that go hand in hand with quarrying such as overburden placement which needs to occur as part of the quarrying activity as it is necessary to remove and store the overburden to be able to access the aggregate below.</p> <p>Winstone request that land to be protected as regionally significant mineral deposits and should urgently be identified, mapped and set aside for that purpose in the plan so that the importance of these areas are fully recognised as such (as is anticipated by Method 52 RPS).</p> <p><b>Relief sought:</b></p> <p>Retain the text recognising that development in locations that restrict access to aggregate resource is a significant issue for the region.</p> <p>Clarify if the listed issues are for iwi authorities only, or if they are also for local authorities.</p>

	<p>Undertake mapping of Regionally Significant Aggregate Deposits to allow for their protection.</p>
<p>Chapter 3.6 Indigenous Biodiversity General comments</p>	<p>Provisions do not allow for consideration of ‘big picture’ biodiversity gains – requiring that all existing values are protected can result in perverse outcomes. E.g. where a small extent of biodiversity loss is required in one location to facilitate much greater biodiversity gains.</p> <p><b>Relief sought:</b>          Objective and Policy framework in this chapter be amended to allow offsetting taking into account “big picture” biodiversity gains.</p>